

**ATTACHMENT 17: COMPREHENSIVE PLAN POLICY CONSISTENCY ANALYSIS**

REQUIREMENT	DISCUSSION
<b>AESTHETICS AND VISUAL RESOURCES</b>	
<p><i>Coastal Land Use Plan Policy 4-4 / Land Use Element Visual Resource Policy 3: In areas designated as urban on the land use plan maps and in designated rural neighborhoods, new structures shall be in conformance with the scale and character of the existing community. Clustered development, varied circulation patterns, and diverse housing types shall be encouraged.</i></p>	<p><b>Consistent.</b> The 2023-2031 Housing Element Update (HEU) rezone amendments would facilitate new residential and mixed-use development with a range of multifamily housing types, sizes, and affordability levels. The visual impact from these developments is largely associated with higher density housing and mixed-use developments of 20 units per acre or more. These developments may be subject to a State-mandated ministerial review process (e.g., use by right per Government Code (GC) Section 65583.2(h) and (i)). However, such developments would be subject to adopted objective design standards (e.g., Santa Barbara County (County) Land Use and Development Code (LUDC) Chapter 35.33) and existing Design Residential (DR) zone development standards, including open space requirements, setbacks, and height limits. These standards would ensure that new developments are in conformance with scale and character of the community to the greatest extent feasible whilst complying with the rezoning and density requirements of State housing element law. Thus, projects would be consistent with the visual resource protection policies of the Comprehensive Plan.</p>
<p><i>Eastern Goleta Valley Community Plan Policy EGV-4.1: Land use and development shall complement existing neighborhoods and enhance aesthetics and viewsheds, where site suitability and layout, project scale, neighborhood land use characteristics, and urban design are factors considered in planning and design.</i></p>	<p><b>Consistent.</b> The Eastern Goleta Valley Community Plan Area contains a variety of existing urban uses that are often intermixed with residential uses. This is especially apparent in the neighborhoods near the intersection of Hollister Ave. and Patterson Ave., which contain residential, commercial, industrial, and agricultural uses within a roughly one-mile radius. Similarly, the neighborhoods along Hollister Ave. near San Marcos Rd. and Turnpike Rd. include residential, commercial, professional/institutional, and agricultural uses. Given the wide variety of urban uses in the plan area, new housing developments would complement existing neighborhoods, even at densities of 20 to 40 units per acre. Further, future developments must comply with adopted objective design standards (e.g., LUDC Chapter 35.33) and existing DR zone development standards. These standards would help to ensure new multifamily</p>

	<p>housing projects enhance aesthetics and, as a result, help to ensure consistency with visual resource policies, zoning code standards, and applicable regulations in the Urban Area.</p>
<p><b>Orcutt Community Plan Policy VIS-O-2:</b> <i>Prominent public view corridors (U.S. 101, State Routes 1 &amp; 135, Clark Ave., Santa Maria Way, and Union Valley Parkway) and public viewsheds (Orcutt/Solomon Hills, Casmalia Hills, and Orcutt Creek) should be protected.</i></p>	<p><b>Consistent.</b> The HEU rezone amendments would facilitate new residential and mixed-use development in Orcutt and Santa Ynez with a range of multifamily housing types, sizes, and affordability levels. However, adopted objective design standards (e.g., LUDC Chapter 35.33) and DR zone development standards would apply. These standards would help to ensure new multifamily housing projects enhance viewsheds, aesthetics, and existing neighborhoods and, as a result, help to ensure consistency with visual resource policies.</p>
<p><b>Santa Ynez Valley Community Plan GOAL LUT-SYV 2:</b> <i>New residential development should fit-in seamlessly with existing surrounding development.</i></p>	
<p><b>AGRICULTURAL RESOURCES</b></p>	
<p><i>Agriculture Element GOAL II: Agricultural lands shall be protected from adverse urban influence.</i></p> <p><b>Agriculture Element GOAL III:</b> <i>Where it is necessary for agricultural lands to be converted to other uses, this use shall not interfere with remaining agricultural operations.</i></p> <p><b>Policy III.A.</b> <i>Expansion of urban development into active agricultural areas outside of urban limits is to be discouraged, as long as infill development is available.</i></p>	<p><b>Consistent.</b> The proposed amendments would enable the conversion of up to approximately 38 acres of agriculturally designated lands in the North County and approximately 366 acres of land within the South Coast to non-agricultural uses. They include 20 acres in the North County and approximately 267 acres within the South Coast that are designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. That said, the Agricultural Element does anticipate instances where conversion to other uses is necessary, especially within Urban Areas of the county. Additionally, concentrating the future housing sites within the Urban Areas of the county helps to protect rural agricultural lands from adverse urban influence, consistent with Policy III.A of the Agricultural Element. Future development on sites adjacent to the Rural Area will also be subject to agricultural buffers, which will further protect agricultural lands from adverse urban influence.</p>
	<p>In the process of identifying potential rezone sites, the County identified all available urban infill sites that had a reasonable likelihood of developing within the eight-year planning period. However, these sites were not enough to satisfy the County’s Regional Housing Needs Allocation (RHNA) plus the 15 percent buffer for the lower- and moderate-</p>

	<p>income levels. As a result, the County was obligated under State housing element law to identify other available sites, including agriculturally-zoned sites. However, most of these sites are infill sites located within the Urban Area that are surrounded by existing residential, commercial, and institutional uses. By identifying these urban agricultural sites, the County can preserve Rural Area agriculture to the greatest extent feasible. The sites located in the rural area are adjacent to the Urban/Rural Boundary. The largest site is currently operating as a golf course and is not in active agriculture. The two sites in the Carpinteria Valley are bordered by the City of Carpinteria on at least two sides.</p>
<p><b><i>Coastal Land Use Plan Policy 8-3: If a parcel is designated for agricultural use and is located in a rural area contiguous with the urban/rural boundary, conversion shall not be permitted unless:</i></b></p> <p><i>a. The agricultural use of the land is severely impaired because of physical factors (e.g. high water table), topographical constraints, or urban conflicts (e.g., surrounded by urban uses which inhibit production or make it impossible to qualify for agricultural preserve status), and</i></p> <p><i>b. Conversion would contribute to the logical completion of an existing urban neighborhood, and</i></p> <p><i>c. There are no alternative areas appropriate for infilling within the urban area or there are no other parcels along the urban periphery where the agricultural potential is more severely restricted.</i></p>	<p><b>Consistent.</b> The HEU rezone amendments propose to convert two potential rezone sites at the urban/rural boundary from agricultural uses to residential – Van Wingerden 1 and Van Wingerden 2. Van Wingerden 1 adjoins the Urban Area to the east and it is bordered by the city of Carpinteria on three sides. Similarly, Van Wingerden 2 is bordered by the city on two sides. Both sites are adjoined by existing residential uses, which impact the long-term agricultural viability of both sites and also make them logical extensions of existing urban neighborhoods. There are no other parcels along the urban periphery where the agricultural potential is more severely restricted. The HEU identified all available infill sites that had a reasonable likelihood of developing within the eight-year planning period. However, all of these sites are located in Goleta Valley and Eastern Goleta Valley. Rezoning Van Wingerden 1 and 2 would help the County address the housing crisis in other areas of the South Coast and help meet the South Coast RHNA for the lower- and moderate-income levels. Additionally, the owner of these sites has indicated the possibility of partnering with a non-profit to provide affordable farmworker housing on these sites, which would benefit other agricultural operations in the vicinity by providing housing to support a more stable workforce.</p>
<p><b><i>Eastern Goleta Valley Community Plan Policy LUA-EGV-1: Agricultural resources, agricultural land uses and operations, and distinctive urban and</i></b></p>	<p><b>Consistent.</b> The HEU rezone amendments would not convert any agricultural land in the Rural Area in Eastern Goleta Valley, which ensures that the</p>

<p><i>rural agricultural characteristics shall be preserved to the greatest extent feasible.</i></p>	<p>vast majority of agricultural resources, agricultural land uses and operations, and rural agricultural characteristics would be preserved. The future potential residential and mixed-use development enabled under the amendments would potentially convert existing agricultural lands in the Urban Area only, including potentially all of the San Marcos Agricultural Area and a majority of the South Patterson Agricultural Area, which are the two remaining agricultural blocks in the Urban Area within Eastern Goleta Valley. While conversion of urban agricultural land would have a physical impact on agricultural resources, the amendments would preserve urban agricultural resources to the greatest extent feasible because the list of potential rezone sites from which the Board of Supervisors (Board) will select includes the minimum number of agriculturally-zoned housing sites to accommodate the County’s RHNA plus 15 percent buffer for lower- and moderate-income levels. As a result, even though the conversion of urban agriculture will be necessary to meet the RHNA, the HEU rezone amendments preserve urban agriculture in Eastern Goleta Valley to the greatest extent feasible.</p>
<p><b><i>Eastern Goleta Valley Community Plan Policy LUA-EGV-1.5: Urban Agricultural Land Uses: Agricultural land within the Urban Area shall be preserved for urban agricultural uses to the greatest extent feasible.</i></b></p>	
<p><b><i>Eastern Goleta Valley Community Plan Policy LUA-EGV-1.6: Urban Agricultural Land Use Conversion: To the greatest extent feasible, any general plan amendment and/or rezone proposal in the Urban Area which results in a change of land use designation from agricultural to non-agricultural shall:</i></b></p> <p><i>1. Require a factual and substantive finding by the County that (a) the land is no longer appropriate for urban agricultural land uses following due consideration consistent with all policies of the Plan, or (b) there is an overriding public need for conversion to other uses. As part of the finding the County will:</i></p> <p><i>a. Evaluate and document factually and substantively the quality and extent of agricultural resources onsite and adjacent to the property, including, but not limited to, prime agricultural land, land in existing agricultural use, lands with</i></p>	<p><b>Consistent.</b> County decision-makers can make finding 1(b) of Policy LUA-EGV-1.6 that there is an overriding public need for conversion to other uses as the State of California has declared that “the availability of housing is of vital statewide importance, and the early attainment of decent housing and a suitable living environment for every Californian, including farmworkers, is a priority of the highest order” (GC Section 65580(a)). State housing element law mandates that the County identify sufficient land zoned to accommodate its RHNA (GC Section 65583.2(c)) and rezone sites if existing zoned capacity is insufficient. Thus, given the acute housing shortage and the County’s RHNA shortfall of lower- and moderate-income units in the South Coast, the County must rezone sites in Urban Areas such as the Eastern Goleta Valley. As mentioned above, the County exhausted all other available infill options before identifying urban agricultural lands as potential rezone sites, and selected these urban agricultural lands to avoid</p>

<p><i>prime soils, grazing land, land with agricultural potential, and lands under Williamson Act contracts.</i></p> <p><i>2. Require proposed land uses that:</i></p> <p><i>a. Are consistent with all policies of this Plan.</i></p> <p><i>b. Are compatible with each other and with neighboring land uses—whether agricultural or non-agricultural.</i></p> <p><i>c. Avoid partitioning or interrupting contiguous blocks of agriculturally-designated lands.</i></p> <p><i>d. Preserve and enhance environmental resources, including, but not limited to coastal bluff geology, habitat areas, visual resources, and watershed resources, and community characteristics, particularly with regard to agricultural heritage and natural environmental resources, and/or minimize environmental impacts.</i></p> <p><i>e. Include provisions for the community's social, economic and cultural well-being, and health and safety, such as public parks, open spaces, trails, habitat protection or restoration, and/or community gardens.</i></p> <p><i>f. Dedicate public open space for habitat preservation and/or public recreation and indicate the amount and extent.</i></p> <p><i>g. Provide public coastal access, parking, recreational trails, bike paths, and/or pedestrian routes.</i></p> <p><i>h. Confine and cluster non-agricultural development adjacent to existing developed areas and transportation facilities to maximize preservation of open space, with the exception of passive public recreation improvements such as trails, signs and park facilities.</i></p>	<p>converting lands in the Rural Area to the maximum extent feasible.</p> <p>As envisioned under Part 2 of this policy, future residential development enabled by the rezones would be required to be consistent with policies of the Eastern Goleta Valley Community Plan, including those pertaining to resource protection such as creek setbacks and buffers from environmentally sensitive habitat. These areas of Eastern Goleta Valley are currently characterized by a mix of uses, including residential, institutional, commercial, and agricultural. As such, new residential development on these sites would be compatible with other neighboring uses and continue this existing pattern of mixed urban development. Future development would be subject to the development standards of the DR zone, including the provision of open space and clustering development to maximize the protection of resources. They will also be subject to Objective Design Standards that will help to ensure the future development will complement the existing community. Development of these sites will also provide opportunities to enhance neighborhood connectivity to existing bike paths and pedestrian routes.</p>
<p><b>Orcutt Community Plan Policy LUA-O-3:</b> <i>In consideration of conversion of any agricultural land within the urban boundary to urban uses, the County shall first consider smaller, more isolated parcels with greater urban/agricultural conflicts</i></p>	<p><b>Consistent.</b> The HEU rezone amendments do not propose to rezone existing agricultural land within the Orcutt Community Plan Area. Future development would be generally compatible with adjacent agricultural lands given the distance and</p>

<p><i>prior to considering conversion of larger blocks of agricultural lands.</i></p>	<p>intervening uses between potential housing sites and agricultural areas outside the Urban Areas of the community.</p>
<p><b>Orcutt Community Plan Policy LUA-O-2:</b> <i>Development in Orcutt shall be compatible with adjacent or nearby agricultural lands.</i></p>	
<p><b>Santa Ynez Valley Community Plan Policy LUA-SYV-3:</b> <i>New development shall be compatible with adjacent agricultural lands.</i></p>	<p><b>Consistent.</b> The HEU rezone amendments do not propose to rezone existing agricultural land in the Santa Ynez Valley. The Chumash LLC site lies within the Urban Area at the existing edge of the developed footprint of the Santa Ynez Valley, adjacent to rural agriculture. Similar to existing development in this area, the future infill of this site would not infringe on adjacent agricultural land and all urban uses would be contained within the site.</p>
<p><b>BIOLOGICAL RESOURCES</b></p>	
<p><b>Coastal Land Use Plan Policy 9-37:</b> <i>The minimum buffer strip for major streams in rural areas, as defined by the land use plan, shall be presumptively 100 feet, and for streams in urban areas, 50 feet. These minimum buffers may be adjusted upward or downward on a case-by-case basis. The buffer shall be established based on an investigation of the following factors and after consultation with the Department of Fish and Game and Regional Water Quality Control Board in order to protect the biological productivity and water quality of streams:</i></p> <ol style="list-style-type: none"> <li>1) soil type and stability of stream corridors;</li> <li>2) how surface water filters into the ground;</li> <li>3) slope of the land on either side of the stream; and</li> <li>4) location of the 100-year flood plain boundary.</li> </ol> <p><i>Riparian vegetation shall be protected and shall be included in the buffer. Where riparian vegetation has previously been removed, except for channelization, the buffer shall allow for the reestablishment of riparian vegetation to its prior extent to the greatest degree possible.</i></p>	<p><b>Consistent.</b> The HEU rezone amendments facilitate future development that could cause impacts to streams and associated environmentally sensitive habitat (ESH). However, all future development must comply with applicable stream and ESH setback requirements of the Comprehensive Plan, including the zoning ordinances, Coastal Land Use Plan, and community plans. Thus, the amendments would be consistent with these stream and ESH protection policies.</p>
<p><b>Coastal Land Use Plan Policy 9-38:</b> <i>No structures shall be located within the stream corridor except: public trails, dams for necessary water supply projects, flood control projects where no other</i></p>	

<p><i>method for protecting existing structures in the flood plain is feasible and where such protection is necessary for public safety or to protect existing development; and other development where the primary function is for the improvement of fish and wildlife habitat. Culverts, fences, pipelines, and bridges (when support structures are located outside the critical habitat) may be permitted when no alternative route/location is feasible. All development shall incorporate the best mitigation measures feasible.</i></p>	
<p><b>Eastern Goleta Valley Community Plan Policy HYD-EGV-2.2:</b> <i>Setbacks of a minimum of 50 feet from top of bank but adjusted upward as needed to adequately protect life and property from potential flood hazards shall be required as determined by County Flood Control.</i></p>	
<p><b>Goleta Community Plan Policy BIO-GV-8:</b> <i>The minimum buffer strip and setbacks from streams and creeks for new development and actions within the ESH overlay that are regulated by the County Zoning Ordinances shall be as follows, except on parcels designated for agriculture in inner rural areas where Policy BIO-GV-9 shall apply:</i></p> <p><i>a. ESH areas within urban, inner rural and existing developed rural neighborhoods: a setback of 50 feet from either side of top of bank of creeks or existing edge of riparian vegetation, whichever is further, minimizing all ground disturbance and vegetation removal, shall be indicated on all grading plans;</i></p> <p><i>b. ESH areas within the Mountainous-GOL zone district: a buffer of 200 feet from the edge of existing riparian vegetation. Grading and vegetation removal within these buffers shall be limited consistent with the purpose and intent of the ESH overlay district, while not precluding reasonable use of a parcel.</i></p>	
<p><b>Eastern Goleta Valley Community Plan Policy ECO-EGV-2.3:</b> <i>Where sensitive plant species and sensitive animal species are found pursuant to the review of a discretionary project, the habitat in which the sensitive species is located shall be</i></p>	<p><b>Consistent.</b> Future development facilitated by the HEU rezone amendments could cause impacts to sensitive natural communities and habitats. However, MM BIO-1 and MM BIO-2 of the HEU Program Environmental Impact Report (Program</p>

<p><i>preserved to the maximum extent feasible. For the purposes of this policy, sensitive plant species are those species that appear on the County’s list of locally rare, generally rare, or endangered plants, and the California Native Plant Society’s Inventory of Endangered Vascular Plants of California. Sensitive animal species are defined as those animal species identified by the California Department of Fish and Wildlife, the U.S. Fish and Wildlife Service and/or are listed in Tate’s The Audubon Blue List (birds).</i></p>	<p>EIR) require standard setbacks from native habitats and the location of new development outside the canopy dripline of native trees, respectively. MM BIO-1 would also require a tree protection plan to avoid impacts on oak trees. MM BIO-3 would require a wildlife movement plan to address the protection of wildlife linkages on a site-by-site basis. These mitigation measures would ensure consistency with the applicable Comprehensive Plan policies.</p>
<p><b>Eastern Goleta Valley Community Plan Policy EGV-3.2:</b> <i>Clustering or relocation of development to less sensitive areas or parcels to conserve open land and environmental resources shall be strongly encouraged without resulting in urban development patterns in the Rural Area.</i></p>	<p><b>Consistent.</b> The HEU rezone amendments are primarily concentrated in urban infill areas in order to conserve open land and avoid disruption of significant natural resources. Where resources are present, the rezone amendments mostly involve Design Residential (DR) zoning, which requires open space preservation and clustering of residential development in the Eastern Goleta Valley, Orcutt, and the Santa Ynez Valley to the maximum extent feasible, consistent with these policies.</p>
<p><b>Eastern Goleta Valley Community Plan Policy ECO-EGV-2.4:</b> <i>Where sites proposed for development contain sensitive or important habitats and areas to be preserved over the long-term, degradation of these habitats shall be avoided to the maximum extent feasible, and demonstrated unavoidable impacts minimized as a component of a project, including, but not limited to, one or more of the following conditions: Dedication of onsite open space easements covering habitat areas. Onsite habitat restoration programs utilizing appropriate native, drought-tolerant, and/or fire-resistant species. Monetary contributions toward habitat acquisition and management. Offsite easement and/or restoration of comparable habitat/area when onsite preservation is infeasible.</i></p>	
<p><b>Orcutt Community Plan Policy BIO-O-5:</b> <i>New facilities in Orcutt, including roads, bikepaths/trails, sewer lines and retention basins, shall to the maximum extent feasible be sited and designed to avoid disruption of significant natural resources within designated natural undeveloped open space areas, minimize removal of significant native vegetation and trees and provide for reasonable levels of habitat restoration for significant habitats disrupted by construction.</i></p>	
<p><b>Santa Ynez Valley Community Plan Policy BIO-SYV-1:</b> <i>Environmentally sensitive biological</i></p>	



<p><i>resources and habitat areas shall be protected and, where appropriate, enhanced.</i></p>	
<p><b>GEOLOGY AND SOILS</b></p>	
<p><b><i>Coastal Land Use Plan Policy 3-13 / Land Use Element Hillside and Watershed Protection Policy 1:</i></b> <i>Plans for development shall minimize cut and fill operations. Plans requiring excessive cutting and filling may be denied if it is determined that the development could be carried out with less alteration of the natural terrain.</i></p>	<p><b>Consistent.</b> Residential and mixed use development occurring as a result of the HEU rezone amendments would require, to varying extents, grading, cutting, and filling activities. However, most of the potential rezone sites are located in Urban Areas that would not require excessive alteration of the natural terrain. Additionally, all development would be required to comply with California Building Code Chapter 70 standards, which include certification of grading plans, cut and fill, and erosion control by a professional geotechnical engineer and professional engineering geologist. Further, the County requires conformance with County Grading and Building Codes (Chapters 14 and 10, respectively, of the County Code) to address potential geologic hazards.</p>
<p><b><i>Coastal Land Use Plan Policy 3-14 / Land Use Element Hillside and Watershed Protection Policy 2:</i></b> <i>All development shall be designed to fit the site topography, soils, geology, hydrology, and any other existing conditions and be oriented so that grading and other site preparation is kept to an absolute minimum. Natural features, landforms, and native vegetation, such as trees, shall be preserved to the maximum extent feasible. Areas of the site which are not suited for development because of known soil, geologic, flood, erosion or other hazards shall remain in open space.</i></p>	<p><b>Consistent.</b> Residential and mixed use development occurring as a result of the HEU rezone amendments would generally be sited within the existing Urban Area such that it would be consistent with existing site topography, soils, geology, and hydrology to the maximum extent feasible while accommodating the proposed residential densities. In addition, all future development would be required to comply with California Building Code Chapter 70 standards, which include certification of grading plans, cut and fill, and erosion control by a professional geotechnical engineer and professional engineering geologist. Further, the County requires conformance with County Grading and Building Codes (Chapters 14 and 10, respectively, of the County Code) to address potential geologic hazards. Also, MM BIO-1 and MM BIO-2 of the Program EIR require standard setbacks from native habitats and the location of new development outside the canopy dripline of native trees, respectively.</p>
<p><b><i>Land Use Element Hillside and Watershed Protection Policy 3:</i></b> <i>For necessary grading operations on hillsides, the smallest practical area of land shall be exposed at any one time during</i></p>	<p><b>Consistent.</b> Residential and mixed-use development occurring as a result of the HEU rezone amendments that would involve substantial grading or clearing of land would be subject to</p>

<p><i>development, and the length of exposure shall be kept to the shortest practicable amount of time. The clearing of land should be avoided during the winter rainy season and all measures for removing sediments and stabilizing slopes should be in place before the beginning of the rainy season.</i></p>	<p>relevant plans and practices, including the County’s Grading Ordinance, Building Code, and adopted construction best management practices (BMPs), such as the California Stormwater Quality Association’s Construction Handbook. These would include measures to minimize exposure and erosion and ensure appropriate slope stability, soil protection, and sediment control measures, as necessary.</p>
<p><b>Hillside and Watershed Protection Policy 5:</b> <i>Temporary vegetation, seeding, mulching, or other suitable stabilization method shall be used to protect soils subject to erosion that have been disturbed during grading or development. All cut and fill slopes shall be stabilized immediately with planting of native grasses and shrubs, appropriate nonnative plants, or with accepted landscaping practices.</i></p>	
<p><b>Seismic Safety and Safety Element Geologic and Seismic Protection Policy 1:</b> <i>The County shall minimize the potential effects of geologic, soil, and seismic hazards through the development review process.</i></p>	<p><b>Consistent.</b> Construction of future residential development resulting from the HEU rezone amendments must comply with the California Building Code to ensure that new development minimizes risks to life and property and that stability and structural integrity are sufficient to protect against seismic hazards and avoid contributions to erosion or alterations to natural landforms. In addition, all future development requiring substantial grading, cut, and fill activities would need to comply with the County’s Grading Ordinance (Chapter 14 of the County Code), which contains measures that aim to minimize erosion and ensure soil stability and sediment control during construction.</p>
<b>HAZARDS</b>	
<p><b>Seismic Safety and Safety Element Fire Policy 9:</b> <i>The County shall minimize the potential effects of fire hazards through the development review process pursuant to State law.</i></p>	<p><b>Consistent.</b> The HEU rezone amendments would result in the development of housing within or adjacent to Very High Fire Hazard Severity Zones (FHSZ) and the designated Wildland-Urban Interface (WUI), particularly within the Eastern Goleta Valley, Carpinteria, Orcutt, Mission Hills, and Vandenberg Village. New residential development in these wildfire hazard areas could result in increased wildfire hazards due to steep slopes, substantial natural vegetation fuel sources, and “sundowner” winds. However, all projects would be required to comply with applicable SBCFD development standards and Building Code requirements for high fire hazard areas, which would help to minimize the effects of fire hazards</p>

	<p>on new development. Additionally, existing County Fire Code standards would help to ensure adequate defensible space is provided around future development to reduce wildfire risks.</p>
<p><b>HYDROLOGY AND WATER QUALITY</b></p>	
<p><b>Land Use Element Flood Hazard Area Policy 1:</b> <i>All development, including construction, excavation, and grading, except for flood control projects and non-structural agricultural uses, shall be prohibited in the floodway unless off-setting improvements in accordance with HUD regulations are provided. If the proposed development falls within the floodway fringe, development may be permitted, provided creek setback requirements are met and finish floor elevations are above the projected 100-year flood elevation, as specified in the Flood Plain Management Ordinance.</i></p>	<p><b>Consistent.</b> The HEU rezone amendments could result in the development of housing within or adjacent to flood hazard areas. MM HWR-1 of the Program EIR would require that all new development on sites affected by special flood hazards comply with the design requirements listed in the most recently adopted Flood Control District’s Standard Conditions for Project Plan Approval. These standard conditions would require that all development complies with applicable requirements of Chapters 15A, 15B, and 24-7 of the County Code, prepare site plans showing existing mapped special flood hazards, and as applicable, mitigate flood risks, site runoff, and onsite and offsite flooding through modification of the site and implementation of special improvements. With implementation of MM HWR-1, the HEU rezone amendments would be consistent with these policies.</p>
<p><b>Seismic Safety and Safety Element Flood Policy 2:</b> <i>The County shall evaluate whether development should be located in flood hazard zones, and identify construction methods or other methods to minimize damage if development is located in flood hazard zones pursuant to Government Code §65302(3)(g)(2)(ii).</i></p>	<p><b>Consistent.</b> Future housing development and changes in land use associated with the HEU rezone amendments would result in increases in impervious surfaces, which in turn would increase stormwater runoff and discharges to drainage systems and the potential to cause flooding in areas without sufficient drainage facilities. The introduction of sediment or pollutants could occur from spills and leaks of petroleum products or other chemicals associated with construction equipment, vehicles, and pumps. However, all future development would be required to comply with the National Pollutant Discharge Elimination System (NPDES) MS4 permit, the County’s Stormwater Management Plan (SWMP), the County’s Grading Ordinance (County Code Chapter 14), and the Regional Water Quality Control Board (RWQCB) Resolution R3-2013-0032. Compliance with these regulations would minimize impervious surfaces at a site, capture stormwater onsite, decrease surface water flows, and slow runoff rates, all of which</p>
<p><b>Land Use Element Hillside and Watershed Protection Policy 4:</b> <i>Sediment basins (including debris basins, desilting basins, or silt traps) shall be installed on the project site in conjunction with the initial grading operations and maintained throughout the development process to remove sediment from runoff waters. All sediment shall be retained on site unless removed to an appropriate dumping location.</i></p>	
<p><b>Land Use Element Hillside and Watershed Protection Policy 6:</b> <i>Provisions shall be made to conduct surface water to storm drains or suitable watercourses to prevent erosion. Drainage devices shall be designed to accommodate increased runoff resulting from modified soil and surface conditions as a result of development. Water runoff shall be retained on-site whenever possible to facilitate groundwater recharge.</i></p>	
<p><b>Land Use Element Hillside and Watershed Protection Policy 7:</b> <i>Degradation of the water</i></p>	

<p><i>quality of groundwater basins, nearby streams, or wetlands shall not result from development of the site. Pollutants, such as chemicals, fuels, lubricants, raw sewage, and other harmful waste, shall not be discharged into or alongside coastal streams or wetlands either during or after construction.</i></p>	<p>would mitigate the potential for onsite and offsite flood flows associated with housing development. Further, future development in a flood hazard area would be required to comply with County Code Chapter 15A, Floodplain Management and 15B, Development Along Watercourses. These regulatory standards are designed to ensure future development of a site reduces or addresses flood hazards and prevents or regulates the construction of barriers that might unnaturally divert floodwaters or increase flood hazards in other areas.</p>
<p><b>LAND USE AND PLANNING</b></p>	
<p><b><i>Land Use Element Land Use Development Policy 3:</i></b> <i>No urban development shall be permitted beyond boundaries of land designated for urban uses except in neighborhoods in rural areas.</i></p>	<p><b>Consistent.</b> The HEU rezone amendments would primarily create the potential for new housing on infill sites in the existing Urban Area. However, the amendments would facilitate some new housing development on sites currently located within the Rural Area. For example, the Glen Annie site is located in the Rural Area and would transform a golf course surrounded by natural areas and agricultural uses into an urban residential neighborhood with up to 40 units per acre in some areas on the site. Rezoning of this site and others in the Rural Area require an expansion of the Urban Area boundary. As such, the proposed Land Use Element and Coastal Land Use Plan amendments (Attachments 3 and 7 to the Board letter dated April 30, 2024, respectively) include amendments to the South Coast Rural Region Land Use Designation Maps and Goleta Land Use Designation Map to expand existing or create new Urban Areas to encompass these rezone sites. As mentioned above, the County identified all available urban infill rezone sites that had a reasonable likelihood of developing within the eight-year planning period. However, these sites were not enough to satisfy the County’s RHNA plus the 15 percent buffer for the lower- and moderate-income levels. As a result, the County was obligated under State housing element law to identify other available sites outside the Urban Area, such as Glen Annie. Though these sites are located in the Rural Area, they would create logical extensions of existing urban areas and neighborhoods as they are adjoined by existing residential uses and city boundaries.</p>
<p><b><i>Goleta Community Plan Policy LU-GV-1:</i></b> <i>The Urban/Rural Boundary around the Goleta community shall separate principally urban land uses and those which are rural and/or agricultural in nature. This boundary shall represent the maximum extent of the Goleta urban area and the Urban/Rural Boundary shall not be extended prior to the development of existing inventories of vacant land within the urban area. This Boundary shall not be moved except as part of an update of the Community Plan.</i></p>	

<p><b><i>Eastern Goleta Valley Community Plan Policy LUR-EGV-1.4: Multifamily or mixed use development plans shall be designed to include a range of unit sizes and designs to maximize the affordability, flexibility, and appeal of the residential properties to meet local housing needs.</i></b></p>	<p><b>Consistent.</b> A substantial portion of the future housing development enabled by the HEU rezone amendments would be located in the Eastern Goleta Valley. Based on the sites inventory prepared for the HEU, a range of multifamily housing types, sizes, and affordability levels would be possible on potential rezone sites and County-owned sites. Thus, these sites can meet local housing needs as defined by the 6th Cycle RHNA.</p>
<p><b><i>Eastern Goleta Valley Community Plan Policy LUR-EGV-2.2: Residential Neighborhood Development: Residential Neighborhood Developments are defined as residential subdivisions for ten (10) or more lots, and/or development plans for ten (10) or more units on residentially designated properties. Residential Neighborhood Development proposals shall be considered only when: the development is in the Urban Area or EDRN, and the resulting Residential Neighborhood Development comprehensively considers the features, resources, and constraints of the property onsite and adjacent to the development area to assess the cumulative effect of the development, and the scale, height, architectural style, design, and concentration of structures/density of structures proposed for the development are compatible with surrounding neighborhoods to the greatest extent feasible, and the development is designed to be energy- and resource efficient, and the development is designed in accordance with the County’s applicable design guidelines, and the development includes provisions for the community’s social, economic and cultural well-being, and health and safety, such as public and private open spaces, habitat preservation or restoration, multimodal transportation improvements, visual resource enhancements, community parkland (active and/or passive), and/or community gardens.</i></b></p>	<p><b>Consistent.</b> As described above, many future housing developments enabled by the HEU rezone amendments would be located in the Eastern Goleta Valley. Potential rezone sites in the plan area would be located in the Urban Area as a result of the amendments. Development of these sites would be subject to compliance with adopted development and objective standards of the County’s zoning ordinances, requirements to ensure adequate services (e.g., water, wastewater) are provided to serve proposed development, County Public Works engineering and design standards, and Fire Department standards, as well as the requirements of the California Building Code. Compliance with these standards is required for all development enabled under the HEU rezone amendments, which would help to ensure adequate design of future development to address issues such as scale, height, architectural style, design, sustainability, safety, resource protection, and multi-modal connectivity. They will also be subject to Objective Design Standards that will help to ensure the future development will complement surrounding neighborhoods. Additionally, the County incorporated MM LU-1 into the proposed zoning ordinance amendments (Attachments 6 and 9 to the Board letter dated April 30, 2024). These amendments allow public open space (i.e., public parks and recreation), commercial recreation, and neighborhood-serving commercial uses as a component of housing projects on sites zoned DR. As such, the changes to the County’s DR zone district will support the needs of future residents and the community as a whole consistent with the Comprehensive Plan.</p>
<p><b><i>Eastern Goleta Valley Community Plan Policy LUR-EGV-2.4: Residential and Mixed use</i></b></p>	<p><b>Consistent.</b> The HEU rezone amendments propose a countywide land use pattern for residential and</p>

<p><i>Neighborhood Development should be considered ideally located: 1. Within walking distance (0.25 miles maximum) of commercial/service nodes and employment centers, schools, and/or parks and recreation facilities. 2. When connected to multimodal transportation corridors, Community Corridors, and public transit routes and stops.</i></p>	<p>mixed-use development that supports sustainable community planning. The amendments bring new residential development to communities currently served by active transportation infrastructure, including sidewalks, bike lanes, and transit services, to support more sustainable, active pedestrian-friendly development that decreases reliance on the automobile and increases transit use, bicycling, and walking. This is especially true for residential and mixed-use development projects located within the South Coast (i.e., Eastern Goleta Valley), which support reduced vehicle miles travelled (VMT) relative to other Housing Market Areas. Further, in Eastern Goleta Valley, Hollister Avenue, Calle Real, and Turnpike Road are defined as Complete Street Community Corridors and prioritized for multi-modal improvements in County transportation project planning. Most of the potential South Coast rezone sites are located along these corridors and would be well-served by ongoing multi-modal improvements to these roadways. As such, the amendments promote more sustainable land use patterns countywide and create opportunities for alternative transportation. Additionally, amendments to the County’s zoning ordinances (Attachments 6 and 9 to the Board letter dated April 30, 2024) effectuate MM LU-1, which would allow public open space (i.e., public parks and recreation), commercial recreation, and neighborhood-serving commercial uses as a component of housing projects on sites zoned DR. These amendments would change the County’s DR zone district to support the needs of future residents and the community as a whole consistent with the Comprehensive Plan.</p>
<p><b><i>Eastern Goleta Valley Community Plan Policy ENV-EGV-1.1: Restrict urban-style development to the Urban Area, prioritizing infill and redevelopment strategies, to protect coastal and rural area environmental resources.</i></b></p>	<p><b>Consistent.</b> The HEU rezone amendments do not facilitate new housing development in the Rural Area of Eastern Goleta Valley.</p>
<p><b><i>Orcutt Community Plan Policy LUR-O-1: Consistent with the Housing Element, the County shall encourage the provision of a mix of affordable units on parcels within the Orcutt Planning Area.</i></b></p>	<p><b>Consistent.</b> Potential rezone sites within Orcutt include a range of multifamily housing types, sizes, and affordability levels. Based on the HEU, these sites can meet local housing needs as defined by the 6th Cycle RHNA.</p>

<p><b><i>Orcutt Community Plan Policy LUR-O-2: Future growth and development shall occur in a manner which minimizes construction related impacts on the community.</i></b></p>	<p><b>Consistent.</b> Temporary impacts to the traffic safety environment can occur during construction when heavy haul trucks, cement trucks, materials and equipment delivery trucks, construction worker vehicles, and other construction-related vehicles travel along freeways and the local transportation network. MM T-2 requires the preparation of individual Construction Traffic and Access Management Plans for residential and mixed-use development involving encroachment into the public right of way to address construction-related impacts. Further, temporary noise would be generated from construction activities, including the modification or potential demolition of existing uses, construction of new residential or mixed-use developments, and other similar types of construction related to housing development. MM NOI-1 and MM NOI-2 would apply to all residential and mixed-use projects to control construction noise generated from specific equipment and phases of development, as well as limit the duration and timing of construction to minimize adverse impacts on sensitive receptors to address construction-related impacts.</p>
<p><b><i>Orcutt Community Plan Action LUR-O-4.1: The County shall encourage development which preserves the character of existing neighborhoods, particularly as to key natural undeveloped open space preservation, traffic safety on local roads and preservation of important natural features. Where a proposed development project requires redesignating the property to a density exceeding that of all contiguous residential parcels by more than 50%, the County may consider reducing the proposed density or denying the project in order to prevent a substantial deterioration of these factors.</i></b></p>	<p><b>Consistent.</b> The HEU rezone amendments increase the maximum allowed density for residential land use designations and zoning districts from 30 to 40 units per acre. The amendments also set minimum densities. However, the zoning ordinance amendments (Attachments 6 and 9 to the Board letter dated April 30, 2024) include a provision to allow for lower densities than the minimum if site constraints, such as topography, geologic or flood hazards, habitat areas, or steep slopes, would preclude the development of a rezoned site at the required minimum density. By establishing higher densities and rezoning sites in the Orcutt area that are most suitable to residential development, key undeveloped open space and important natural features within the community can be more readily preserved. Additionally, when future development is proposed on any rezone sites, existing State law (i.e., the Housing Accountability Act) may limit local jurisdictions’ ability to reduce densities. For example, a local jurisdiction may reduce the density of a project where there is a potential health</p>

	and safety impact (i.e., lack of water or sewer services).
<i>Orcutt Community Plan Policy LUC-O-3: Mixed use development on land designated for commercial use shall be encouraged where appropriate.</i>	<b>Consistent.</b> The HEU rezone amendments support mixed-use development in existing Urban Areas as a key strategy to meet the County’s RHNA and reduce VMT. Mixed-use developments on potential commercial rezone sites in Orcutt (e.g., Key Site 11) could provide housing consistent with this policy.
<i>Santa Ynez Community Plan Policy LUT-SYV-1.1: Consistent with the Housing Element, the County shall encourage the provision of a mix of affordable units on parcels within the Santa Ynez Community Plan Area.</i>	<b>Consistent.</b> As described above, a relatively small portion of the housing enabled by the HEU rezone amendments would be located in Santa Ynez Valley, largely because housing needs in this region are not as great as other, more urbanized areas. The Chumash site would include a range of multifamily housing types, sizes, and affordability levels. Based on the HEU, this site would help meet local housing needs as defined by the 6th Cycle RHNA.
<b>NOISE</b>	
<i>Noise Element Policy 1: In the planning of land use, 65 dB Day-Night Average Sound Level should be regarded as the maximum exterior noise exposure compatible with noise-sensitive uses unless noise mitigation features are included in project designs.</i>	<b>Consistent.</b> The HEU rezone amendments could result in residential uses in existing or future noise environments that exceed the County’s noise thresholds established by the Noise Element. MM NOI-1 and MM NOI-2 would apply to all residential and mixed-use projects to control construction noise generated from specific equipment and phases of development, as well as limit the duration and timing of construction to minimize adverse impacts on sensitive receptors. MM NOI-2 would also require housing projects under the Housing Element Update that are proposed in areas where existing or future transportation noise levels exceed the County’s threshold of 65 dBA to include a noise study to assess existing and future noise conditions and identify site-specific noise attenuation techniques to ensure interior noise levels are maintained below 45 dB day-night average sound level (Ldn). Further, rezoning sites within high quality transit corridors and facilitating residential development in areas of the County to reduce the jobs-housing imbalance, combined with the implementation of MM T-1, would reduce the Annual average daily trips (ADT) to help ensure its contribution to
<i>Noise Element Policy 5: Noise-sensitive uses proposed in areas where the Day-Night Average Sound Level is 65 dB or more should be designed so that interior noise levels attributable to exterior sources do not exceed 45 dB LDN when doors and windows are closed. An analysis of the noise insulation effectiveness of proposed construction should be required, showing that the building design and construction specifications are adequate to meet the prescribed interior noise standard.</i>	
<i>Noise Element Policy 6: Residential uses proposed in areas where the Day-Night Average Sound Level is 65 dB or more should be designed so that noise levels in exterior living spaces will be less than 65 dB LDN. An analysis of proposed projects should be required, indicating the feasibility of noise barriers, site design, building orientation, etc., to meet the prescribed exterior noise standard.</i>	



	ambient roadway noise is substantially reduced on local roadways.
<p><b>Noise Element Policy 3:</b> <i>For protection of sensitive activities, as well as the airports, noise-sensitive land uses, other than hotels and motels insulated to the level prescribed in the State Noise Insulation Standards, should not be permitted within the 65 dB CNEL contour of any airport as projected in the County Airport Land Use Plan. In no case shall institutional land uses, such as schools, hospitals, convalescent homes, and other in-patient health care facilities, be permitted within the boundaries of such 65 dB CNEL contour.</i></p>	<p><b>Consistent.</b> Due to the limited inventory of suitable rezone sites, up to 41.1 acres of potential new housing would be subject to airport noise levels of 60-65 dB Ldn generated by either Santa Barbara Airport or Santa Maria Airport. The effects of this noise are significant but mitigatable through implementation of MM NOI-2. This measure requires that an application for multifamily housing development include a site-specific noise study that documents the existing noise conditions on site and recommends attenuation strategies and techniques to address sensitive receptors and achieve acceptable noise levels under County standards. As a result of this measure, noise control techniques (e.g., modern construction standards and design) would be incorporated into the project to reduce exterior noise to at or below 65 dBA and interior noise to at or below 45 dBA, thus making developments consistent with this policy.</p>
<p><b>Noise Element Policy 4:</b> <i>Residential use should be avoided within the 65 dB CNEL contour of any airport and under airport traffic patterns.</i></p>	
<p><b>Noise Element Policy 13:</b> <i>The Board of Supervisors should recommend to the City of Santa Barbara that measures be taken to assure compliance of the Santa Barbara Municipal Airport with California Airport Noise Standards. Approximately 280 housing units are located within the 65 dB CNEL contour established for the Airport. California Airport Noise Standards require that, by January 1, 1986, no residential dwellings (except acoustically treated units) exist within the Airport's 65 dB CNEL contour. The City of Santa Barbara should begin planning now to meet these requirements.</i></p>	
<b>PUBLIC SERVICES, UTILITIES, AND RECREATION</b>	
<p><b>Land Use Element Land Use Development Policy 4:</b> <i>Prior to issuance of a development permit, the County shall make the finding, based on information provided by environmental documents, staff analysis, and the applicant, that adequate public or private services and resources (i.e., water, sewer, roads, etc.) are available to serve the proposed development. The applicant shall assume full responsibility for costs incurred in service extensions or improvements that are required as a result of the proposed project. Lack of available public or private services or resources shall be grounds for denial of the project or reduction in the density otherwise indicated in the land use plan.</i></p>	<p><b>Consistent.</b> Prior to final approval and issuance of building permits for any housing project, adequate public or private services and resources (i.e., water, sewer, roads) must be demonstrated to serve the proposed development, which would ensure future growth and development occurs only as resources and services are available.</p>

<p><b>Land Use Element Land Use Development Policy 5:</b> <i>Within designated urban areas, new development other than that for agricultural purposes shall be serviced by the appropriate public sewer and water district or an existing mutual water company, if such service is available.</i></p>	
<p><b>Land Use Element Parks/Recreation Policy 1:</b> <i>Bikeways shall be provided where appropriate for recreational and commuting use.</i></p>	<p><b>Consistent.</b> No development is approved as part of this project. Several of the potential rezone sites are situated adjacent to or in close proximity to existing bikeways. MM T-1 requires the provision of bikeways and pedestrian routes where appropriate to enhance recreational and commuting use and reduce the reliance on automobiles, consistent with this policy. Staff is proposing an additional policy be added to the Land Use Element (Parks/Recreation Policy 6, see Attachment 3, Exhibit A to the Board letter dated April 30, 2024) to further encourage and guide the construction of bikeways, pedestrian routes, and trail connections through and between housing sites in order to promote healthy communities by increasing walkability, multi-modal transportation, neighborhood connectivity to and between commercial services, and enhance public recreational opportunities. Future development would be subject to consistency with this proposed policy where applicable.</p>
<p><b>Eastern Goleta Valley Community Plan Policy SF-EGV-1.1:</b> <i>The County shall ensure that required public services and facilities to meet the needs of development are constructed and operational concurrently with, or in advance of, the construction and operation of development.</i></p>	<p><b>Consistent.</b> Prior to final approval and issuance of building permits for housing projects enabled by the HEU rezone amendments, adequate services to service proposed development must be demonstrated, which would ensure future growth and development occurs only as resources and services are available. In addition, future development would be subject to the County’s existing development impact fee requirements to help mitigate public service impacts and fund necessary improvements. MM UWS-1 would further help to ensure consistency with this policy by requiring applicants to secure adequate utilities.</p>
<p><b>Eastern Goleta Valley Community Plan Policy SF-EGV-1.2:</b> <i>The County shall encourage developers to use innovative measures to mitigate the public service impacts from their developments in addition to standard in-lieu fees, including, but not limited, to payment of development impact fees; direct public service facility improvements; creation of public service facility benefit assessment districts etc.</i></p>	
<p><b>Eastern Goleta Valley Community Plan Policy WAT-EGV-1.1:</b> <i>For projects that would result in a net increase in water use, there shall be a sufficient</i></p>	

<p><i>supply of water to serve existing commitments plus the proposed project.</i></p>	
<p><b><i>Eastern Goleta Valley Community Plan Policy WAT-EGV-1.7:</i></b> <i>Subdivisions or projects that result in increased residential density shall be analyzed to ensure that sufficient supply of water exists to serve existing commitments and the proposed project.</i></p>	
<p><b><i>Orcutt Community Plan Policy WW-O-2:</i></b> <i>Prior to discretionary approval of new development, the County shall make a finding that there will be adequate capacity and availability for Laguna County Sanitary District (LCSD) to serve the new development.</i></p>	
<p><b><i>Orcutt Community Plan Policy WAT-O-2:</i></b> <i>In order to be found consistent with Land Use Development Policy No. 4 (LUDP#4), the water demand of new discretionary development must be offset by long-term supplemental water supplies that do not result in further overdraft of the local groundwater basin and that are adequate to meet the project’s net water demand as determined by the County considering appropriate reliability factors as determined by County Water Agency. To demonstrate an adequate long-term supplemental water supply, projects must comply with the following development standards:</i></p>	
<p><b><i>Orcutt Community Plan DevStd Wat-O-2.1:</i></b> <i>Prior to discretionary action by any County decision-maker on new development, the applicant shall provide one of the following:</i></p> <ol style="list-style-type: none"> <li><i>1. A "Can and Will Serve" letter from California Cities Water Company dated before July 1997</i></li> </ol> <p><i>An "Intent to Serve" letter from California Cities Water Company or other water purveyor(s) including draft contract(s), if any, demonstrating to the County’s satisfaction that the development’s net water demand will be offset by a long-term supplemental water supply and that the development will have a continuing right to obtain water equal to that of the water purveyor’s other customers. Contract(s), if any, must include terms consistent with the requirements of DevStd WAT-O-2.2</i></p>	

<p><b><i>Orcutt Community Plan DevDtd Wat-O-2.2:</i></b> <i>Prior to discretionary action on new development, the applicant must demonstrate adequacy of the water supply proposed to serve the project, unless the applicant has satisfied DevStd WAT-O-2.1 #1 above. This demonstration shall be based on the following information, which must be provided prior to application completeness:</i></p>	
<p><b><i>Santa Ynez Valley Community Plan Policy WW-SYV-1:</i></b> <i>Development and infrastructure shall achieve a high level of wastewater treatment, in order to best serve the public health and welfare.</i></p>	<p><b>Consistent.</b> If rezoned, future development on the Chumash site in Santa Ynez Valley would not generate additional wastewater that would exceed the available permitted and design treatment capacity of Los Alamos Community Services District (CSD) and Santa Ynez CSD. Based on this buildout, development enabled by the HEU rezone amendments may generate an additional 0.06 million gallons per day (MGD), which would be within the remaining treatment and discharge capacity of Santa Ynez CSD’s wastewater treatment system. Nevertheless, MM UWS-1 would also help to ensure consistency with this policy by requiring applicants to secure adequate utilities.</p>
<p><b><i>Santa Ynez Valley Community Plan Policy WAT-SYV-2:</i></b> <i>Existing and future water supply and quality shall continue to be periodically evaluated with specific measures identified to maintain adequate supply levels and quality, if deemed necessary.</i></p>	<p>Given the existing surplus supply of municipal water for water agencies in the Santa Ynez Valley, the HEU rezone amendments would not be anticipated to result in a substantial adverse increase in demand for municipal water supplies, such that future increases in water demand could not be reliably met or such that expansion or improvement of the current water supply infrastructure would be required. Nevertheless, MM UWS-1 would also help to ensure consistency with this policy by requiring applicants to secure adequate utilities.</p>
<p><b><i>Orcutt Community Plan Policy OS-O-1:</i></b> <i>When considering approval of development projects within or adjacent to areas identified for potential public open space (see Table 21 of the Orcutt Community Plan), the County shall review the appropriate mix of public and/or private open space, and to the maximum extent feasible require dedication of contiguous areas identified as a</i></p>	<p><b>Consistent.</b> The potential increase in population within Orcutt under the HEU rezone amendments would substantially increase the number of people that use existing parks and potentially degrade areas such as the ballfields and playgrounds, either physically or through overcrowding. Each housing project enabled under the amendments would be evaluated for consistency with these policies and be</p>

<p><i>priority for public acquisition as public open space based on the following criteria:</i></p> <ul style="list-style-type: none"> <li><i>location within designated open space corridors and proximity of adjacent open space;</i></li> </ul> <p><i>the criteria and intent of the PRD zone district; and demonstration of rough proportionality between the level of permitted development, its associated impact, and the open space dedication, consistent with applicable laws.</i></p>	<p>required to comply with applicable open space requirements and/or in-lieu fee payment under the County’s existing Quimby Fee or Development Impact Mitigation Fee program. Further, MM LU-1 would require the County to amend the County’s zoning ordinances to allow public open space (i.e., public parks and recreation), commercial recreation, and neighborhood-serving commercial uses as a component of housing projects on sites zoned DR, similar to current provisions in the PRD zone. This measure would change the County’s DR zone district to support the needs of future residents and the community as a whole consistent with the Comprehensive Plan.</p>
<p><b><i>Orcutt Community Plan Policy OS-O-2:</i></b> <i>The County's priority for acquisition of public open space is on PRD sites within and adjacent to areas identified for potential public open space (see Table 21 of the Orcutt Community Plan). The County should consider acceptance or acquisition of public open space in other zone districts based on the criteria in Policy OS-O-1, the importance of the site's natural resources and recreation potential, and the level of public and property owner interest.</i></p>	

**TRANSPORTATION**

<p><b><i>Circulation Element Policy A:</i></b> <i>The roadway classifications, intersection levels of service, and capacity levels adopted in this Element shall apply to all roadways and intersections within the unincorporated area of the County, with the exception of those roadways and intersections located within an area included in an adopted community area plan. Roadway classifications, intersection levels of service, and capacity levels adopted as part of any community or area plan subsequent to the adoption of this Element shall supersede any standards included as part of this Element.</i></p>	<p><b>Consistent.</b> The HEU rezone amendments address regional housing needs consistent with State law. The Circulation Element and various community plans identify capacities, or levels of service (LOS), that are considered acceptable for normal operations for different roadway classifications and intersections. The County anticipates that approval of some housing projects enabled by the rezones would result in some roadways and/or intersections operating below current LOS standards based on current traffic levels combined with future development, and improvements necessary to fully offset a project’s impacts to a roadway or intersection may be infeasible. As stated throughout this staff report, State law mandates that the County meet its RHNA, including rezoning certain sites to meet the identified shortfall of lower- and moderate-income units. The current LOS standards could represent a significant constraint to the development of needed housing and the County is required to remove such barriers. The objective of the Circulation Element is to “provide clear traffic capacity guidelines that are</p>
<p><b><i>Circulation Element Policy E:</i></b> <i>A determination of project consistency with the standards and policies of this Element shall constitute a determination of project consistency with the Land Use Element's Land Use Development Policy #4 with regard to roadway and intersection capacity.</i></p>	

intended to maintain acceptable levels of service on the County's roadways and intersections, while allowing reasonable growth within the communities of the unincorporated area” (Circulation Element, Santa Barbara County, Republished April 2014). Thus, in accordance with the objective of the Circulation Element and State mandate to accommodate reasonable and needed growth, staff proposes amendments to the Circulation Element that would exempt future housing projects that help the County meet its RHNA numbers during the 6<sup>th</sup> cycle from complying with these standards (See Attachment 4 to the Board letter dated April 30, 2024). With this proposed amendment, the rezone amendments would be consistent with these policies.

Individual housing projects enabled by the rezone amendments will still be required to comply with the County Transportation Impact Study Requirements (Public Works Department, 2007), including completion of traffic studies to inform requirements to improve roadways and intersections directly serving the project. These improvements commonly include sidewalks and bicycle lanes, additional travel and turning lanes, intersection signalization and timing changes, pedestrian crossings, street lighting, and signage. These improvements have the potential to mitigate impacts to the operations of area roadways and intersections from new housing projects. Additionally, individual project applicants would be required to pay transportation impact mitigation fees under County Code Chapter 23C, which contribute fair-share funding to offsite transportation improvements needed to serve regional growth. However, the existing Circulation Element and transportation impact mitigation fees do not account for the additional traffic and multi-modal needs of the rezone amendments and resulting housing projects. MM T-3 requires that the County update its capital improvement (CIP), transportation impact programs (TIP), and transportation impact mitigation fees to fully fund and implement required improvements, which could include bikeways and other improvements

	<p>for recreational and commuting use. The County has begun the process to update its transportation impact mitigation fees according to Assembly Bill 1600.</p>
<p><b><i>Eastern Goleta Valley Community Plan Policy TC-EGV-1.9:</i></b> All feasible measures to fully mitigate the transportation impacts associated with development projects, including new and innovative measures as may become available, shall be considered and encouraged.</p>	<p><b>Consistent.</b> Many of the potential rezone sites are infill sites located in the Urban Area. As infill sites, many residential and mixed-use projects may have a beneficial effect of connecting existing neighborhoods to other neighborhoods, schools, parks, and commercial services, thereby improving the cohesiveness and continuity of the urban environment. Further, MM T-1 would require site-specific mitigation requirements that ensure each future housing project design provides facilities and programs to support residents’ use of transit and active transportation modes. Requirements would include filling in gaps in the sidewalk network, expanding bike infrastructure, subsidizing transit fares if transit service nearby is available, and providing bike parking. Additionally, staff is proposing a new Parks/Recreation policy (see Attachment 3, Exhibit A to the Board letter dated April 30 , 2024) to complement this mitigation measure and to further encourage and guide the construction of bikeways, pedestrian routes, and trail connections through and between housing sites in order to increase walkability and multi-modal transportation services. MM T-3 requires an update to the County’s CIP, TIPs, and transportation impact mitigation fees to fully fund and implement required improvements, which could include bikeways and other improvements appropriate for recreational and commuting use.</p>
<p><b><i>Orcutt Community Plan Policy LUR-O-6:</i></b> In order to provide community cohesiveness, new neighborhoods should be designed to provide circulation, pedestrian, bicycle and public transportation linkage to existing neighborhoods, schools, parks, and commercial areas.</p>	
<p><b><i>Santa Ynez Valley Community Plan Policy LUT-SYV-2.1:</i></b> In order to provide community cohesiveness, new neighborhoods should be designed to provide circulation, pedestrian, bicycle and public transportation linkage to existing neighborhoods, schools, parks, and commercial areas.</p>	