



COUNTY EXECUTIVE OFFICE

COMPREHENSIVE PLANNING DIVISION

MEMORANDUM

DATE: December 5, 2006

TO: Board of Supervisors

FROM: John McInnes, Director, Long Range and Strategic Planning

SUBJECT: Revisions to the Proposed Final EIR for the Uniform Rules for Agricultural Preserves and Farmland Security Zones, December 2006 **(04EIR-08-RV1)**

A Program Environmental Impact Report (04EIR-08) was prepared for the Uniform Rules Update Project to assess potential impacts resulting from amendments to the Uniform Rules for the County's Agricultural Preserve Program. This memorandum documents revisions to the proposed Final EIR, which have occurred subsequent to release of the proposed Final EIR on August 24, 2006, to reflect minor text changes, amplifications and clarifications.

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. According to the Guidelines Section 15088.5(a), "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 meaningful opportunity to comment on new substantial adverse project impacts or feasible mitigation measures or alternatives which the project proponent declines to adopt. 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 to an adequate EIR".

EIR Revision Findings:

It is the finding of the Board of Supervisors that the proposed Final EIR as herein amended may be used to fulfill the environmental review requirements for the Uniform Rules Update Project. None of the changes approved by the Board of Supervisors would result in any new significant environmental impacts nor would they result in a *substantial increase* in the severity (i.e. change in impact level classification) of any environmental impact originally analyzed in the Proposed Final EIR. Consequently, pursuant to CEQA Guidelines Section 15088.5(b), the proposed revisions described in this document have not been recirculated. The proposed Final EIR for the Uniform Rules Update Project is hereby amended by this revision document (04EIR-08-RV1), together identified as the *Final Environmental Impact Statement for the Uniform Rules for Agricultural Preserves and Farmland Security Zones, Santa Barbara County 2006 (04EIR-08)*.

I. MINOR TEXT CHANGES AND CLARIFICATIONS

This section identifies the changes in the proposed Final EIR since it was released to the public on August 24, 2006.

Copies of replacement EIR pages containing text changes are included in Attachment A for the following revisions:

Page	Section	Revision	Explanation
2-2	2.2	Amend text to explain Figure 1 (that follows on page 2-3) and revise Table 2-1 to add footnote.	To clarify that non contracted lands also include lands zoned for agriculture under Ord 661.
3-29	3.1.5	Identify changes to proposed mitigation measures since the DEIR.	Presentation of changes to the mitigation measures using strike-through and underline was inadvertently left out of Sec. 3.1 in the PFEIR.
3-62	3.4.3.A	Add paragraph about beneficial impacts on traffic associated with providing for additional winery processing capacity on contracted land.	This statement is in response to comments on the Draft EIR but was inadvertently left out of Sec. 3.4 of the PFEIR.
3-73	3.5.3	Add paragraph about beneficial impacts on air quality associated with providing for additional winery processing capacity on contracted land.	This statement is in response to comments on the Draft EIR but was inadvertently left out of Sec. 3.5 of the PFEIR.
5-2	5.1.3	Delete sentence: “The conversion of portions”	This statement is not further substantiated in the text and has been deleted.
6-3	6.1.2	Deletion of comments by DOC	Not considered pertinent to the EIR analysis or proposed amendments.

II. CHANGES IN ENVIRONMENTAL IMPACTS

The proposed changes do not result in any new significant impacts that cannot be mitigated (Class I) nor have any Class II or III impacts become more severe such that they have become Class I impacts as a result of the changes identified above.

III. MITIGATION MONITORING AND REPORTING PLAN

A Mitigation Monitoring and Reporting Plan for the Uniform Rules Update Project has been adopted pursuant to the requirements of Public Resources Code §21081.6 and is included as Attachment B.

Attachment A

FINAL EIR REPLACEMENT PAGES

land within the Los Padres National Forest. Approximately 555,400 acres of agricultural land is enrolled in the Agricultural Preserve Program, which represents roughly 74% of the total private land in the County zoned for agriculture- (Figure 1)- [identifies contracted land and other land zoned for agriculture or mountainous or resource management that could become eligible for contracts. The agriculturally-zoned lands also include land zoned for agriculture under Ordinance 661. Those lands, comprising 150,000 acres*, require a zoning amendment to either AG-I or AG-II at the time of application to enroll in the Agricultural Preserve program.](#)

Table 2-1 provides an overview of agricultural land currently [eligible for or](#) enrolled in the Agricultural Preserve Program, broken down by agricultural region within the County and demonstrates that the Santa Maria and Santa Ynez valleys have the most land enrolled in the Program. Roughly two-thirds of the contracts within the County are preserves of 100 acres or greater in size.

Table 2-1
Summary of Agricultural Lands and Lands Enrolled in the Agricultural Preserve Program.

Rural Region	Total No. of Contracts	Contracts < 100 acres	Contracts ≥ 100 acres	Total No. of Parcels	Total Contracted Acreage	Total Land Zoned Agriculture*
South Coast	166	149	17	301	11,035	24,186
Gaviota Coast	195	17	178	279	56,108	68,143
Santa Ynez Valley	238	54	184	459	141,426	173,868
Lompoc Valley	230	66	164	382	89,048	116,814
San Antonio Creek	82	16	66	128	63,723	77,637
Santa Maria Valley	255	83	172	485	134,584	186,094
Cuyama Valley	52	11	41	161	58,671	102,323
Los Padres (private)	4	0	4	5	800	1,453
Total	1,222	396	826	2,200	555,394	750,521

* Includes all privately-owned, agriculture-zoned land. As of October 2006, AG-I/II total 608,000 ac; Ord. 661 totals 150,000 ac. **Source:** Agricultural Preserve Program Statistics from County Assessor’s Office, as of [January 4, September 2005](#); zoning statistics provided by Santa Barbara County Planning & Development.

2.3 PROJECT OBJECTIVES AND OVERVIEW

The Uniform Rules Update proposes changes to several aspects of the Uniform Rules in order to meet the following objectives: 1) bring the Uniform Rules into conformance with recent legislative amendments to the Williamson Act; 2) address discrepancies in the Uniform Rules that were identified in a 2001 audit of the County’s Agricultural Preserve Program by the California Department of Conservation ([refer to Appendix 10](#)); 3) ensure the continued integrity of the Agricultural Preserve Program; and 4) increase the clarity and flexibility of the Uniform Rules to ensure continued and expanded participation in the County’s Agricultural Preserve Program. Additionally, the Update proposes reformatting the Uniform Rules to make them more user-friendly. Below is a general description of some of the major changes being proposed as part of the project description. The complete draft of proposed Uniform Rule changes is provided as Appendix 2.

* [Source: Santa Barbara County Planning & Development GIS, September 2006.](#)

Primary additions to bring the Rules into conformance with the Williamson Act include incorporating principles of compatibility from the Act (Gov. Code §51238.1) that provide criteria to be considered when evaluating the compatibility of ~~non-agricultural~~ [uses such as dwelling units or agricultural support uses including AIO, preparation and processing facilities and wineries](#) (Rule 2-1.1); updating the definition of recreational use to require that land be in its “agricultural or natural state” (Rule 2-5); incorporating the required findings to allow a lot line adjustment on contracted land (Rule 1-3); and adding the appropriate findings and procedures required for contract cancellations (Rule 6-1.2).

Cumulative Projects on Agriculturally Zoned Land in the County). In consideration of all the aforementioned uses and potential buildout, the cumulative impacts are considered to be *significant*.

3.1.5 Mitigation Measures

Existing Policies and Development Standards that May Reduce Impacts

Existing policies in the County's Comprehensive Plan, Local Coastal Plan (LCP), and applicable Community plans address agricultural resource protection and land use compatibility issues. Any future development on contracted land would need to be found consistent with these policies through the permit process. The most relevant policies include policies I.A, II.D and III.A of the Agricultural Element, Land Use Development Policy 4 of the Land Use Element, and Development policies 2-6 and 2-10 of the Local Coastal Plan. These policies are discussed throughout Section 4, Policy Consistency Analysis. The policies in the Agricultural Element call for the protection of agricultural soils from premature urban development or other land conversion. The policies in the Land Use Element and Local Coastal Plan help to protect the rural character of the area by minimizing growth inducing effects of development.

In addressing facilities developed under an Agricultural Industry Overlay, the Land Use Element (page 174) requires the following criteria to be met:

- ◆ The project site should not include prime soils, or environmentally sensitive areas where development would result in significant adverse impacts;
- ◆ The placement of the designation will not represent a significant cumulative loss of agricultural land in the planning area.

Development standards applied to wineries permitted under the Winery Permit Processing Ordinance (Article III §35-292j) will help to reduce the likelihood of introducing land uses associated with wineries that create conflicts by making all new winery buildings and structures subject to approval by the Board of Architectural Review and by requiring that the design, scale, and character of the winery be consistent with existing development in the vicinity. Similar standards are applied to other preparation and processing facilities as well under standard permitting requirements.

Development standards would be applied to special events for which a permit is required in order to protect the public health, safety and welfare; these standards would include measures to minimize the land use incompatibility of structures, such as regulation of the number, height, and size of temporary structures, equipment and signs. For wineries with tasting rooms, which are those most likely to have special events, a development plan would be required which would assess the impacts of the project on population increases to ensure that the project will be compatible with the existing surrounding land uses. For non-winery special events, a conditional use permit would be required for ongoing commercial events, such as weddings and receptions, approval of which would require that any significant

environmental impacts are mitigated to the maximum extent feasible. Growth inducement and population increases would be considered in this evaluation on a project-specific basis.

Guest ranches and commercial composting facilities would require a conditional use permit, approval of which requires a planning finding that the project will be compatible with the surrounding existing land uses and subordinate to the rural character of the area. In addition, conditional use permits are subject to CEQA and require that adverse environmental impacts are mitigated to the maximum extent feasible. Potential nuisance issues associated with commercial composting facilities (i.e. noise, dust, and odor) would also be addressed through the conditional use permit process.

Mitigation Measures

Mitigation AG-1: Amend Uniform Rule 2-6 as follows: Uniform Rule 2-6.D. Agricultural facilities developed within an Agricultural Industry Overlay (AIO) ~~shall not exceed 15 acres and~~ shall only be approved if the Board of Supervisors finds that the AIO ~~is necessary to address an unmet regional need and will not result in the concentration of agricultural industry facilities on contracted land within any particular region~~ will not significantly compromise the long-term productivity ~~nor displace (per §51238.1 of the Williamson Act) agricultural use~~ of adjoining and surrounding agricultural land. (*Addresses Impacts AG-1, AG-2, and AG-3*).

Mitigation AG-2: Amend Uniform Rule 2-7 as follows: Uniform Rule 2-7.B.6. The footprint of the commercial composting facility occupies no more than 10% of the premises, or 35 acres, whichever is less; that composting is ~~not enclosed and that any associated composting enclosure on a particular site~~ appropriately sited and scaled; and that it is incidental to the primary agricultural use of the premises. Commercial composting facilities shall only occur on premises at least 40 acres in size within the AG-II zone district, in order to ensure compatibility with surrounding agricultural lands. (*Addresses Impacts AG-1, AG-2 and AG-3*).

Mitigation AG-3: Amend Uniform Rule 2-2.1 as follows: Uniform Rule 2-2.1.A.1. Premises greater than 500 acres are permitted 1 additional acre for a preparation or processing facility site for each additional 100 acres above 500 under contract, not to exceed 15 acres. (*Addresses Impacts AG-1, AG-2, and AG-3*).

~~**Mitigation AG-4:** Amend Uniform Rule 1-4 for superprime contracts as follows: Uniform Rule 1-4.C. In no case shall land be taken out of agricultural production in order to accommodate a residential development envelope larger than 10,000 square feet. (*Addresses Impact AG-1*)~~

~~**Mitigation AG-5:** Amend Uniform Rule 2-11 as follows: Uniform Rule 2-11. Special events on non-winery contracted land shall be limited to no more than 4 event days per year and no more than 200 guests per event. (*Addresses Impacts AG-2 and AG-3*).~~

~~**Mitigation AG-6:** Amend Uniform Rule 1-4 as follows: Uniform Rule 1.4.1.B.5. In the case of two or more principal dwellings on the premises, the total area occupied by all of the dwellings and all accessory structures (including Residential Agricultural Units), landscaping, and non-agricultural roads serving the dwellings shall be no more than 3 acres. (Addresses Impact AG-1).~~

Mitigation AG-7: Amend Uniform Rule 2-2.1 as follows: Add a new requirement as subsection 2-2.1.A. ~~54 Preparation and Processing, that t~~The parcel with the preparation facility has at least 50% of the parcel or 50 acres in commercial agricultural production, whichever is less, unless it can be demonstrated to the Agricultural Preserve Advisory Committee that it is unreasonable due to terrain, sensitive habitat and/or resources or other similar constraints. Where constraints are determined to exist, the Agricultural Preserve Advisory Committee will recommend the minimum productive acreage particular to the premises. Notwithstanding the commercial production eligibility requirements in Rule 1-2.3, the Board of Supervisors may establish different minimum production acreage requirements particular to the parcel and/or premises if the Board finds that a substantial benefit to the agricultural community and public can be demonstrated. (Addresses Impacts AG-1, AG-2, and AG-3).

3.1.6 Residual Impacts

With the application of the above mitigation measures and consideration of the existing County policies addressing agricultural resources and land use, residual impacts of the amended Uniform Rules to these resources are as follows:

Impact AG-1: Mitigations AG-2, and 3 would limit or reduce the cap for large-scale agricultural support facilities and commercial composting facilities. These measures are not expected to reduce the overall amount of agricultural land converted; though they may reduce the percentage of agricultural land lost on a particular premises or in an agricultural region.

Despite these mitigation measures and Uniform Rules provisions to minimize the impacts of agricultural support facilities on agricultural soils, impacts associated with expanding the opportunities and acreage envelopes for these uses could still result in the loss of up to 237 acres of productive agricultural land as discussed in Section 3.1.3 Project Impacts, A. Conversion of Soil and Loss/Impairment of Agricultural Productivity. The possibility also remains that much of the new growth of wineries and other small-scale boutique type processing facilities may be concentrated in certain areas of the County thereby having potentially a relatively larger impact in a more concentrated area. Residual impacts to agricultural resources in terms of the conversion of agricultural soils or loss of agricultural productivity (Impact AG-1) are considered *significant and unavoidable (Class I)*.

Impact AG-2: Mitigation AG-2 would help to facilitate the development of appropriately sited and scaled commercial composting facilities and reduce the potential nuisance issues by ensuring they are located away from residential uses. Mitigation AG-5 places restrictions on the size and frequency of special events to help ensure they are compatible with existing rural land uses and do not interfere with

commercial agricultural operations on the premises or in the vicinity. The land use conflicts identified in Impact AG-2 associated with special events and commercial composting facilities will become *significant but mitigable (Class II)* upon implementation of the recommended mitigation measures,

an agricultural support industry located within a 15-acre AIO site, a 20-acre large-scale winery, and a 35-acre commercial composting facility. Almost 75% of the estimated traffic would be generated by an AIO and large-scale winery development. An AIO facility could possibly contribute 840 ADT and a large-scale winery could generate 557 ADT. Additional residential dwellings and small-scale processing facilities could contribute a combined 410 ADT, however these trips would likely be disbursed throughout the region. The San Antonio Creek region is one of two assumed locations for a commercial composting facility which would generate an estimated 30 ADT. As would be the case for other regions depending on location, the industrial facilities in an AIO or a large-scale winery have the potential to impact the capacity of local roads in this rural region.

Santa Maria Valley: The Proposed Rules changes could result in an estimated increase of ~~2,378~~ 4,063 ADT within the Santa Maria Valley Rural Region. Principal traffic generators include potential development of ~~a 15- and 30-acre AIO facilities,~~ a 15-acre preparation facility, a 13-acre large-scale winery and a 35-acre commercial composting facility. Facilities in ~~an the two~~ AIO could contribute ~~840 a combined 2,525~~ ADT (840 + 1,685), a large-scale winery could contribute 508 ADT and an additional large-scale preparation facility could contribute 280 ADT for a total of 1,628 ADT. The traffic generated by these developments could affect roads in the immediate vicinity of such facilities. Residential, boutique processing and guest ranch development could increase traffic by a combined 720 ADT, but would be disbursed throughout the region.

The individual or cumulative impacts of these potential large industrial facilities have the potential to affect the acceptable capacity of some County roads in the Santa Maria Valley.

Cuyama: The maximum buildout scenario for the Cuyama Valley suggests that residential development would contribute the majority of vehicle trips (300 ADT). The estimated total ADT of 364 for residential, small-scale guest ranch and small-scale processing combined would not affect road capacity in this rural region.

For those regions likely to attract a large-scale winery there may also be a beneficial traffic impact. The current 2.85 million case deficit for wine production from grapes grown on contracted land implies that a large portion of the grapes grown in the County are being trucked to either urban areas or outside of the county for processing. Allowances in Rule 2-2 for larger scale wineries relative to vineyard production will increase processing of wine grapes locally thereby reducing the truck trips transporting the grapes to wineries elsewhere. However, since the reasons for hauling grapes may be the result of business decisions as well as lack of processing capacity, the magnitude of this benefit is unknown.

Increased ADTs not only affect roadway capacities. They can also contribute to conflicts where rural roads are constrained by narrow pavement, sharp curves or other design features or where roads are used by different types of vehicles such as passenger cars, trucks and farm equipment. Increased traffic can also hasten structural degradation of rural roads.

B. Traffic Operations and Safety

Acceptable capacities listed in Table 3.4-2 do not take into consideration the special roadway condition factors identified in the Thresholds of Significance (Table 3.4-4). When applied at the project level of environmental analysis, these special roadway conditions can further reduce a particular roadway's acceptable capacity to as little as 53% of design capacity. The special roadway conditions generally relate to issues of safety and roadway hazards, and several of these conditions would apply to rural roads throughout the rural areas of the County.

emissions expected from the large scale wineries and preparation/processing facilities proposed in the Uniform Rules update (Table 3.5-1)

Table 3.5-1
Projects Likely to Exceed the APCD Threshold of Significance for NO_x or ROC Emissions Due to Increased Vehicles and Trips.

Project Type	Size Specific Trip Rate	Approximate Project Size
Warehouse	5.2/1000 sq. ft.	230,000 sq. ft. or +/- 5.28 acres
Light Industry	58.17/acre	16.5 acres 140,000 sq. ft. or 325 employees
Manufacturing	3.8/1000 sq. ft.	250,000 sq. ft. or +/- 5.7 acres

Source: Scope and Content of Air Quality Sections in Environmental Documents, SBCAPCD

The Uniform Rules update will increase allowable development envelopes for preparation facilities and wineries on larger parcels of contracted land (600 acres or greater) such that for every 100 acres above 500 acres, the premises may add one additional acre to the development envelope up to a maximum of a 20 acres. While development envelopes represent the entire area potentially allowed for development, acreage devoted to the type of facilities within the envelope may differ based on the project. Certain projects will require more space for parking, landscaping and non-emission generating uses. Since APCD vehicle emission generation rates are based on building/facility size, acreages devoted to facilities have been estimated below (Table 3.5-2). Using the information provided in Table 3.4-5 Estimated Average Daily Trips (ADTs) for Specific Proposed Rules by Rural Regions (see Section 3.4 Transportation/Circulation) vehicular emissions associated potential projects have been calculated on a regional basis using URBEMIS 2002 version 8.7¹. As the vehicular emissions associated with projects proposed under the amended Uniform Rules are comparable to the vehicular emissions associated with General Light Industry and Manufacturing uses categorized in URBEMIS, these project types have been applied in the analysis. Table 3.5-1, on the following page, summarizes operational vehicular emissions associated with total potential project build-out resulting from the amended Uniform Rules. The Santa Ynez Valley region is the only region which will potentially exceed the 25 lbs/day ROC or NO_x threshold. Countywide, however, potential cumulative impacts greatly exceed the 25 lbs/day ROC or NO_x threshold.

For those regions likely to attract a large-scale winery there may also be a beneficial impact to air quality. The current 2.85 million case deficit for wine production from grapes grown on contracted land implies that a large portion of the grapes grown in the County are being trucked to either urban areas or outside of the county for processing. Allowances in Rule 2-2 for larger scale wineries relative to vineyard production will increase processing of wine grapes locally thereby reducing the truck trips transporting the grapes to wineries elsewhere resulting in reduced emissions. However, since the reasons for hauling grapes may be the result of business decisions as well as lack of processing capacity, the magnitude of this benefit is unknown.

¹ Data generated by URBEMIS is attached as Appendix 5

from nearby urban areas to rural areas in order to be closer to their place of employment. As set out in Section 2.4.1, this growth would be dispersed throughout the agricultural regions of the County, and would not concentrate in any one rural region. On a County-wide basis this amount of growth would not be significant.

5.1.3 Economic Growth

The amended Uniform Rules would potentially result in economic growth to the rural areas of the County by providing opportunities for greater use of contracted land for preparation and processing facilities, small-scale guest ranches, agricultural support facilities, and commercial composting facilities, among others. These economic opportunities would afford agriculturists with additional income streams increasing the economic stability and viability of existing agricultural operations. In addition, such uses would result in both short-term and long-term job opportunities associated with construction-related activities and operating the commercial/industrial facilities. ~~The conversion of portions of contracted land to various non-agricultural activities, whether it is residential or agricultural-commercial/industrial, could potentially increase pressure to develop adjacent agricultural parcels.~~ Any development proposed must be consistent with existing land use regulations and where applicable, with the Uniform Rules. Given these factors, the amended Uniform Rules would contribute to economic growth in the agricultural areas of the County.

5.1.4 Precedent Setting Action

While the amended Uniform Rules would allow for greater residential development of contracted land, it would not be at densities greater than what is currently allowed in rural agricultural areas of the County. Other changes to the Rules allowing for small-scale guest ranches, agricultural support facilities and commercial composting operations are also currently allowed by zoning and the Comprehensive Plan. Thus the Proposed Uniform Rules would not set any precedents for growth.

5.1.5 Development of Open Space/Vacant Land

Development of open space² is considered growth-inducing when it occurs outside urban boundaries or in isolated locations instead of infill areas. Since the amended Uniform Rules will increase opportunities for development of agricultural support facilities ~~land enrolled in the Agricultural Preserve Program, which is outside of urban areas and most often not contiguous with urban development, the Rules would by this definition allow growth through development of open space on contracted lands, these~~ ~~The development of agricultural support~~ uses are allowed by the Comprehensive Plan and the zoning ordinance and are necessary for supporting and sustaining the County's major production industry which has a gross production value of \$902,891,898. Therefore, no impacts with respect to development of open space/vacant lands are associated with the Uniform Rules amendments.

² Agricultural land is defined by the state as open space land (Government Code 65560.(b)(2)).

While the “No Project” Alternative would have fewer physical impacts as compared to the project description, many of the beneficial impacts (Section 3.1.3.D and Section 5.5) associated with the proposed Rule amendments would not be realized.

6.1.2 Impact Analysis

Agricultural Resources and Land Use

Development under the existing Uniform Rules is much more limited in terms of residential opportunities and agricultural support facilities than the project description. Expansion of agricultural support facilities allowed under the Proposed Uniform Rule amendments, including large-scale wineries, preparation and processing facilities, commercial composting facilities, and facilities in the Agricultural Industry Overlay would result in the combined conversion of 237 acres of agricultural soils to developed uses (Table 3.1-6). The conversion of agricultural soils associated with these uses would not occur under the “No Project” Alternative; therefore, impacts to agricultural resources would be *less significant* as compared to the proposed project.~~Compared to the proposed project, less land will be taken out of agricultural production and converted to a non-agricultural use under the No Project alternative; the 396 acres of agricultural land that could be converted to non-agricultural use would not occur under the “No Project” Alternative.~~ However, production requirements especially on superprime land will be less than the proposed project and could therefore result in fewer acres devoted to agricultural production in these areas.

Land use is likely to remain more rural in character and compatible with surrounding land uses and the intensity of existing development under this alternative, since residential development ~~will~~would likely remain at very low densities and agricultural support facilities will be restricted to smaller sizes (maximum of 5 acres) than what is proposed under the project description. In terms of growth inducement and population increases, this alternative would result in a lower potential for population increases in the agricultural areas, since residential development would be more limited and large numbers of employees would not be needed to support large-scale agricultural support facilities. In addition, the scale of facilities under this alternative would be less likely to require the extension of services that could be growth inducing. While the lack of production requirements will temper the overall impact differential between the existing and amended Uniform Rules, adverse impacts to agricultural resources and land use are expected to be *less significant* under this alternative as compared to the project description. Under this alternative, the wine grape processing deficit would continue and it would not meet the objectives of the project in terms of providing flexibility to landowners to ensure continued participation in the Agricultural Preserve Program. This would potentially result in an increase in nonrenewals and the eventual loss of vast amounts of land under the protection of the Williamson Act.

It is possible that by not providing additional housing opportunities, ~~under this the No Project A~~alternative ~~it~~could encourage contract holders to ~~break up large multiple parcel premises and non-renew their contracts or~~ seek replacement contracts in order to meet their residential needs. ~~This could be detrimental to agriculture in the long run since smaller landholdings are more susceptible to development. It is,~~

~~however, impossible to predict the future actions of contract holders in response to this issue due to the uncertainty and numerous factors involved. Impacts associated with this possible outcome are unknown and thus not incorporated into this analysis as they are too speculative. This could result in fragmentation of larger ranches and farms that historically have been managed as a single agricultural operation. Overtime, this trend could result in individual parcels being sold-off to become smaller agricultural operations managed independently under separate ownerships; leading to a potential reduction in agricultural viability. However, the Department of Conservation (DOC) has strongly expressed their position that use of replacement contracts to facilitate additional residential development is potentially inconsistent with the Williamson Act. According to DOC, development rights are statutorily attributed to existing Williamson Act contracts and cannot be replicated or expanded through use of replacement contracts. This important issue will require additional legal research and will be forwarded to the County Board of Supervisors for their policy considerations.~~

Visual Resources

Impacts to visual resources under the amended Uniform Rules stem primarily from the introduction of structures and uses that are visually incompatible with the rural character of the County's contracted lands and by the potential for large-scale preparation facilities and wineries and other facilities built under the AIO designation to obstruct or degrade public viewsheds. By limiting the opportunities for additional residential development, small-scale guest ranches, and larger-scale agricultural support facilities, the No Project alternative would help to maintain the low density and small-scale nature of development in the rural agricultural areas of the County. This would reduce the likelihood of development which ~~is~~ could be out of character with the existing visual setting that could or obstructs or degrades public or private viewsheds. In addition, visual impacts associated with the introduction of light and glare would be reduced under this alternative since development opportunities are more limited. Therefore, impacts to visual resources are expected to be *less significant* under this alternative relative to the project description

Noise

Under the existing Uniform Rules, there would be less residential development, fewer opportunities for agricultural processing facilities, and no large-scale facilities developed under an AIO. Fewer noise-sensitive receptors (i.e. residential development and guest ranches), and fewer and smaller-scale agricultural support facilities would result in reduced traffic volumes and a smaller rural area population as compared to the project description. For these reasons, noise impacts are expected to be *less significant* under the No Project alternative relative to the project description.

Traffic

Under the project description, the most significant impacts to traffic are sustained as a result of large-scale wineries and agricultural-industry overlay facilities. As the current Uniform Rules do not include provisions for large-scale preparation facilities, AIO and commercial composting facilities, impacts under the 'No Project' scenario would be *less significant*, relative to the project description.

Attachment B

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Monitoring & Reporting Program (04-EIR-08)

Update to the Uniform Rules for Agricultural Preserves and Farmland Security Zones: December 5, 2006

When making findings required for project approval, Public Resources Code 21081.6 requires public agencies to "adopt a reporting or monitoring program for the changes made to the project [which] mitigate or avoid significant effects on the environment." The following table comprises the Mitigation Monitoring and Reporting Plan for the Uniform Rules amendments. Mitigation measures are cited by title as they appear in the EIR; the Uniform Rule provisions that reflect these mitigation measures are cited and explained in the adopted legislative Findings.

Mitigation Measure	Uniform Rule	Monitoring Action	Timing	Party Responsible for Implementation	Monitoring/Reporting Schedule	Party Responsible for Verification
AG-1: Board of Supervisors shall find that the AIO will not significantly compromise the long-term productivity of adjoining and surrounding agricultural land.	Uniform Rule 2-6.F	N/A	Upon adoption of the Uniform Rules	Comprehensive Planning	N/A	Comprehensive Planning
AG-2: Commercial composting facilities shall occupy no more than 10% of the premises, or 35 acres, be appropriately sited and scaled and incidental to the primary agricultural use of the premises.	Uniform Rule 2-7.B.6.	N/A	Upon adoption of the Uniform Rules	Comprehensive Planning	N/A	Comprehensive Planning
AG-3: Preparation facilities not to exceed 30 acres and wineries not to exceed 20 acres.	Uniform Rule 2-2.1.A & B	N/A	Upon adoption of the Uniform Rules	Comprehensive Planning	N/A	Comprehensive Planning
AG-7: Parcels with a preparation facility shall have at least 50% of the parcel or 50 acres in commercial agricultural production	Uniform Rule 2-2.1.A.4	N/A	Upon adoption of the Uniform Rules	Comprehensive Planning	N/A	Comprehensive Planning
VIS-1: Agricultural preparation & processing facilities visible from a State-designated scenic highway should be sited, screened, & designed to be compatible with the scenic & rural character of the area	Uniform Rule 2-1.1.A.4	N/A	Upon adoption of the Uniform Rules	Comprehensive Planning	N/A	Comprehensive Planning
VIS-2: Facilities within an AIO on contracted land visible from a State-designated scenic highway should be sited, screened and designed to be compatible with the scenic and rural character of the area.	Uniform Rule Rule 2-6.E	N/A	Upon adoption of the Uniform Rules	Comprehensive Planning	N/A	Comprehensive Planning