

ATTACHMENT 3



COUNTY OF SANTA BARBARA PLANNING AND DEVELOPMENT

MEMORANDUM

TO: Santa Barbara County Board of Supervisors

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

DATE: November 5, 2024

RE: **Agricultural Enterprise Ordinance
Revisions (RV01) to the Final Environmental Impact Report (23EIR-00003) –
Agricultural Enterprise Ordinance:
Planning and Development Case Numbers 23ORD-00005, 23ORD-00006,
24RZN-00004, & 24RZN-00005**

INTRODUCTION

The County of Santa Barbara prepared a Final Environmental Impact Report (Final EIR) for the Agricultural Enterprise Ordinance Project. There have been subsequent changes to the Agricultural Enterprise Ordinance Project as a result of public review, public comments, and County Planning Commission recommendations to: modify permit requirements, intensity levels, and setback requirements for campgrounds, farmstays, and small-scale events; to modify setback requirements for educational experiences and opportunities and composting; and to create a Limited Agricultural Enterprise Overlay Zone in geographic areas of historic food crop production, which would require a Conditional Use Permit or Minor Conditional Use Permit for select agricultural enterprise uses. This EIR revision document evaluates these changes as recommended by the County Planning Commission.

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

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

Based on the analysis, the Final EIR (23EIR-00003), as herein amended by the attached EIR Revision Document analysis, may be used to fulfill the environmental review requirements for the Agricultural Enterprise Ordinance. None of the changes would result in any new significant, environmental effects or a substantial increase in the severity of previously identified significant effects, or deprive the public of a meaningful opportunity to comment. Hence, pursuant to CEQA Guidelines Section 15088.5(b), the proposed revisions described in this document have not been recirculated. The Final EIR for the Agricultural Enterprise Ordinance is hereby amended by this revision document, together identified as 23EIR-00003 RV01.

Enclosure: Agricultural Enterprise Ordinance Project Final EIR 23EIR-00003 Revision Document
(RV 01)

Agricultural Enterprise Ordinance

Final Environmental Impact Report

23EIR-00003

SCH #2021110353

Revision Document (RV 01)

November 5, 2024

Prepared by:

County of Santa Barbara

Planning and Development Department

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

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Attachment A – WSP Analysis Memorandum, dated September 13, 2024

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I. BACKGROUND

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

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

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

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

II. REVISIONS TO THE EIR ANALYSIS

On August 28, 2024, the County Planning Commission recommended the Board of Supervisors adopt the Project, with modifications, including: modify use intensity allowances for campgrounds, farmstays, and small-scale events; modify setback requirements for campgrounds, farmstays, small-scale events, educational experiences and opportunities, and composting; modify the permit levels for various agricultural enterprise uses; and create a Limited Agricultural Enterprise (LAE) Overlay Zone.

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

Specifically, the County Planning Commission recommendation to the Board of Supervisors included the following:

- Modified Use Intensity Allowances:
 - Campgrounds:
 - Not allowed on premises of less than 40 acres;
 - On premises >320 acres, allow one additional campsite per each additional 200 acres above 320 acres, up to a maximum of 60 campsites;
 - Up to 60 percent of campsites may include landowner provided accommodations (e.g. trailers, yurts or tent cabins);
 - Allow low-impact camping areas with not more than nine campsites, with limited amenities;
 - Allow up to two campground development areas for premises up to 320 acres, and up to four campground development areas for premises above 320 acres;
 - The combined campground development areas shall not exceed five acres of total disturbance; and
 - Campground development areas are not required to be clustered.
 - Farmstays:
 - Maximum 15 guests accommodated in no more than six guest rooms; and
 - Maximum floor area for new guest cottages or park trailers for overnight farmstay accommodations shall not exceed 500 square feet.
 - Small-scale events:
 - Allow events without amplified music, with an Exemption: up to four event days per month and 12 event days per year, with;
 - 50 attendees max for a premises between 40 acres and 320 acres,
 - 100 attendees max for a premises between 320 acres and 1,000 acres, and
 - 200 attendees max for a premises larger than 1,000 acres
 - Allow events with amplified music with a Zoning Clearance: Up to four event days per month and 12 event days per year, with;
 - 50 attendees max for a premise between 40 acres and 320 acres,
 - 100 attendees max for a premise between 320 acres and 1,000 acres, and
 - 200 attendees max for a premise larger than 1,000 acres

- On premises larger than 5,000 acres, allow non-motorized bike races, trail runs, equestrian endurance rides, and other similar activities up to 10 days per month, 10 events per year, and 25 total event days per calendar year, with up to 500 attendees, through an Exemption.
- Setbacks:
 - Requiring setbacks of 100 feet from lot lines, 400 feet from an existing residence on an adjacent lot, and 200 feet from food crops, orchards, or vineyards cultivated within three of the previous 10 years, for campgrounds, educational experiences and opportunities, farmstays, small-scale events, and composting; and
 - Requiring a setback of 1,000 feet from lands zoned residential for small-scale events involving amplified sound.
- Limited Agricultural Enterprise Overlay Zone:
 - Apply the Limited Agricultural Enterprise Overlay Zone (LAE Overlay) to AG-II zoned lands located east and west of the cities of Santa Maria and Lompoc;
 - Allowed uses within the LAE Overlay include:
 - Aquaponics, Agricultural Processing (small-scale), Farm Stands, Horseback Riding (equestrian facility), Hunting, and Incidental Food Service at Wineries;
 - Existing uses currently allowed in the AG-II zone would continue to be allowed in the LAE Overlay;
 - AEO uses allowed with either a Minor Conditional Use Permit or Major Conditional Use Permit:
 - Minor CUP – Campgrounds and low-impact camping areas; educational experiences and opportunities; farmstays; composting facility (Inland Area) fishing operations; firewood processing and sales; lumber processing and milling (small scale); and, small-scale special events.
 - Major CUP – Composting (Coastal Zone).

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

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

The revised Project includes revised allowances for campgrounds, farmstays, and small-scale events as described in Section II, Revisions to the EIR Analysis, above. As discussed in the WSP Analysis Memorandum (Attachment A), the Project revisions are estimated to: increase the total number of campsites across all campgrounds and premises to 1,010 from the Final EIR estimate

of 900; maintain the number of farmstays, but allow all farmstays with up to six bedrooms, rather than a mix of four and six bedrooms; and increase the number of maximum daily event attendees to 9,750 from the Final EIR estimate of 8,750.

The revised intensity levels for campgrounds, farmstays, and small-scale events would also result in an estimated increase in vehicle miles traveled (VMT) of 12.3 percent, or 16,547 VMT, above the VMT estimate identified in the Final EIR to a total estimated 151,070 VMT resulting from the Agricultural Enterprise Ordinance. The Final EIR identified impacts associated with an increase in total VMT resulting from the Agricultural Enterprise Ordinance, Impact T-2 in Section 3.13, Transportation, of the Final EIR, as a significant and unavoidable impact. Based on the analysis provided in Attachment A, the total VMT resulting from the Agricultural Enterprise Ordinance, as revised, would continue to exceed the County's VMT threshold. Although the Project revisions would result in an increase in VMT over the amount analyzed in the Final EIR, the impact related to transportation would remain significant and unavoidable and similar to the impacts described under Impact T-2 of the Final EIR. No new significant impacts or substantive changes in the severity of the impacts would occur as a result of the proposed revisions to the intensity of campgrounds, farmstays, and small-scale events.

Additionally, operational mobile-source air pollutant emissions and operational greenhouse gas (GHG) emissions would proportionally increase by 12.3 percent across all pollutants, including nitrogen oxides (NO_x), reactive organic carbon (ROC), carbon dioxide equivalents (CO₂e), among others (Attachment A). The Final EIR identified impacts associated with new mobile-source air pollutant emissions, Impact AQ-2 in Section 3.3, Air Quality, of the Final EIR, and impacts associated with new GHG emissions, Impact GHG-1 in Section 3.7, Greenhouse Gas Emissions, resulting from the Agricultural Enterprise Ordinance. Impact AQ-2 and Impact GHG-1 are both identified as significant and unavoidable in the Final EIR. In the time since the Final EIR was completed, the County adopted new thresholds of significance for GHG emissions (non-stationary source emissions). Based on the analysis in Attachment A, the total operational mobile-source air pollutant emissions and operational GHG emissions resulting from the Agricultural Enterprise Ordinance, as amended by the Project revisions, would continue to exceed the County's thresholds, including the new GHG emissions thresholds. Although the Project revisions would result in increases in operational mobile-source air pollutant emissions and operational GHG emissions over the amounts analyzed in the Final EIR, the impacts related to air quality and GHG emissions would remain significant and unavoidable and similar to the impacts described under Impact AQ-2 and Impact GHG-1, respectively. No new significant impacts or substantive changes in the severity of the impacts would occur as a result of the proposed revisions to the intensity of campgrounds, farmstays, and small-scale events.

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

The Final EIR (Section 4.2) analyzed the effects of the Project on agricultural resources based on, among other impacts, the proximity of potential agricultural enterprise uses adjacent to row/food crop farming operations. The Project revisions include the following setbacks for

educational experiences and opportunities, small-scale events, composting facilities, farmstays, and campgrounds:

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

(c) Where the facilities or stationary activities are separated from an adjacent commercial farming operation by a four-lane highway, the setback from commercial farming operations shall not apply.

(d) Where residential development (e.g. an existing residence, farm employee dwelling, accessory dwelling unit, or similarly-occupied building) or other development which is existing as of [the effective date of this ordinance] is located on the proposed agricultural enterprise use premises within 200 feet of an adjacent premises with a commercial food crop, orchard, or vineyard farming operation, the setback from the adjacent commercial farming operation may be reduced by up to 50 percent, provided the agricultural enterprise use is located no closer than the aforementioned existing development.

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

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

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

These additional setbacks would ensure further protections for nearby agriculture and residential development. Application of these setbacks would provide more space between these agricultural enterprise uses and active farming operations to protect from potential contamination or disturbance of the farming operations. The setbacks also require space between potential noise generating uses and adjacent residences, resulting in greater noise attenuation. Therefore, impacts to agricultural resources and noise will remain potentially significant but mitigable, as originally concluded in the Final EIR, and this change does not constitute significant new information.

C. Analysis of the Elimination of Land Use Permit Level Permitting and Consolidation into Zoning Clearance Level Permitting for Certain Uses

The Final EIR discussed the different potential permit levels for educational experiences and opportunities, small-scale special events, incidental food service, agricultural processing, agricultural product sales and farm stands, composting facilities, fishing operations, and hunting operations, but did not identify Zoning Clearance or Land Use Permit requirements for specific levels of intensity or development for these uses.

In the County of Santa Barbara, a Zoning Clearance is a less procedurally intensive application process than a Land Use Permit. A Zoning Clearance does not require the surrounding property owners to be noticed and the decision to approve or deny a Zoning Clearance cannot be

appealed, whereas a Land Use Permit must be noticed and can be appealed. The Project revisions modify the permit levels for various agricultural enterprise uses. The consolidation of permit requirements for many agricultural enterprise uses into Zoning Clearance level permitting, as well as establishment of permit exemptions for certain uses, has the potential to increase instances of these uses within the County of Santa Barbara by reducing permit application and processing costs. Agricultural Enterprise Ordinance development standards would apply to all AEO permit tiers, including AEO uses that would be exempt from zoning permits.

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

D. Analysis of the Limited Agricultural Enterprise Overlay Zone

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

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

III. CONCLUSION

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

ATTACHMENT A

WSP Analysis Memorandum, dated September 13, 2024



MEMORANDUM

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

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

DATE: September 13, 2024

Re: *Analysis of Planning Commission Recommendations for Campground and Small-Scale Event Use Assumptions for the Agricultural Enterprise Ordinance Environmental Impact Report*

Per direction from County staff received on March 22, 2024, April 19, 2024, and September 6, 2024, WSP USA, Inc. (WSP) has prepared this memorandum presenting additional analysis in support of the County-prepared Environmental Impact Report (EIR) Revision Letter for the Agricultural Enterprise Ordinance. The purpose of this memorandum is to provide detailed explanation and analysis of potential changes in the severity or magnitude of impacts analyzed in the Final EIR that may occur with revisions to proposed uses identified in the Agricultural Enterprise Ordinance (refer to Table 2-2 in the Final EIR).

Based on our conversations with County staff, we understand that the County has revised the Agricultural Enterprise Ordinance to address Planning Commission recommendations for campgrounds, farmstays, and small-scale events. Specifically, the Planning Commission has recommended that for proposed campground uses on large agricultural parcels, one additional campsite would be allowed for each 200 acres over 320 acres. This would increase the maximum number of campsites allowed on parcels 320 acres in size or larger from 30 campsites, up to a maximum to 60 campsites on sites 6,320 acres or larger. The Planning Commission also recommended that all farmstays up to 6 bedrooms could be permitted with a Zoning Clearance or Land Use Permit, rather than farmstays of only 4 bedrooms or less. This revision would adjust the assumptions regarding the number of new farmstays enabled under the Project to a total of 60 new 6-bedroom farmstays, rather than 30 new 4-bedroom farmstays and 30 new 6-bedroom farmstays. The Planning Commission also recommended revisions to the maximum number of attendees for small-scale events. Lastly, the Planning Commission has proposed a new category of small-scale events that would allow for non-motorized bike races, trail runs, equestrian rides, and similar gatherings. While this use is listed under "Small-Scale Events," it is a new use/concept that was not envisioned or analyzed in the Draft EIR. The use would be limited to premises greater than or equal to 5,000 acres. As such, County staff assumed only 2 new sites, similar to revised assumptions for "50 campsites" on premises greater than 4,320 acres.

These revisions represent minor changes to the Project Description that, while not substantive, require additional quantitative and qualitative analyses.

Specific assumptions for the potential buildout and the number of new uses enabled under the Agricultural Enterprise Ordinance were developed for the purposes of calculating estimated increases in countywide vehicle miles traveled (VMT) under the

proposed Project. The assumptions for potential buildout and the number of new uses enabled under the Agricultural Enterprise Ordinance utilized for analysis of impacts in the Final EIR are presented Table 3.13-10 of Section 3.13, *Transportation*. **Table 1** below summarizes the initial buildout and use assumptions presented therein by activity, as well as the revisions recommended by the Planning Commission on March 13, 2024, June 12, 2024, and July 24, 2024. The Planning Commission did not propose any revisions to the frequency or number of events allowed per year for proposed educational experiences, tours, recreational activities, and events.

Table 1. Agricultural Enterprise Ordinance Use Assumptions and Buildout Projections

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

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

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

Project VMT Impacts

Summary of Project VMT Impacts Presented in the Final EIR

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

Change in VMT Calculations under Planning Commission Revisions

As described above, the Planning Commission proposes revisions to the size and number of larger rural campgrounds, the size of farmstays permitted with a Zoning Clearance or Land Use Permit/Coastal Development Permit, the number of attendees allowed per small-scale event, and the addition of a new category of small-scale events that would allow for non-motorized bike races, trail runs, equestrian rides, and similar gatherings. Utilizing the same assumptions for daily use, ADT rates, and trip lengths as presented in the Final EIR, the Planning Commission's revisions to the Project Description would result in an estimated 151,070 VMT with the addition of new visitor-oriented uses in rural agricultural areas throughout the county. This represents an estimated increase of 16,547 VMT, or 12.3 percent in total new VMT compared to the proposed Project in the Final EIR. Updated calculations for the increase in VMT generated under the revised Project Description and comparison to the VMT calculations presented in the Final EIR are presented in **Table 2**.

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

Project Mobile-Source Air Pollutant Impacts

Summary of Project Air Pollutant Impacts Presented in the Final EIR

Impacts associated with Project-related increases in new mobile-source emissions within the county are described in detail under Impact AQ-2 in Section 3.3, *Air Quality* of the Final EIR. As described therein, utilizing the broad buildout/use assumptions and VMT estimates detailed in Section 3.13, *Transportation*, the Final EIR estimated that the proposed Project has the potential to exceed the County's and Santa Barbara County Air Pollution Control District's (SBCAPCD's) vehicle source emissions threshold of 25 lbs/day for nitrogen oxides (NO_x) and Reactive Organic Compounds (ROC). Therefore, under Impact AQ-2, the Final EIR concluded that based on the established thresholds and the inability to effectively reduce VMT and associated mobile-source

emissions associated with the proposed Project, the increase in operational mobile-source air pollutant emissions would be *significant and unavoidable*.

Change in Air Pollutant Emissions Calculations under Planning Commission Revisions

As described above, the Planning Commission's proposed revisions to the size and number of larger rural campgrounds, along with the number of attendees allowed per small-scale event, would increase total roadway VMT. Based on the above analysis of VMT impacts, implementation of the Planning Commission's proposed revisions would increase estimated VMT by roughly 12.3 percent from that estimated for the Project in the Final EIR.

Operational mobile-source air pollutant emissions would increase proportional to the increase in VMT. Updated calculations for the proportional increase in operational mobile-source air pollutant emissions under the revised use assumptions and comparison to the emissions calculations presented in the Final EIR are presented in **Table 3**.

Table 2. Project Daily Trip and VMT Estimates (Proposed Planning Commission Revisions)

PROPOSED LODGING																
Use	Size	New Sites ¹	Total Campsites/Bedrooms	Daily Use %	Daily Use	ADT Rate	ADT	Day Trip %	Day Trip Length ²	Local VMT	Regional %	Regional Length	Regional VMT	Total Roadway VMT	Final EIR Total VMT Calculation	% Change
Campgrounds (<100 ac) ⁶	15 Campsites	10	150	85%	128	2.03	259	50%	10	1,300	50%	64	8,344	9,644	57,681	11.9
Campgrounds (100-320 ac) ⁶	20 Campsites	15	300	85%	255	2.03	518	50%	10	2,590	50%	64	16,625	19,215		
Campgrounds (≥320 ac) ⁶	30 Campsites	8	240	85%	204	2.03	414	50%	10	2,071	50%	64	13,252	15,323		
Campgrounds (>2,320 ac) ¹³	40 Campsites	4	160	85%	136	2.03	276	50%	10	1,380	50%	64	8,835	10,215		
Campgrounds (>4,320 ac) ¹³	50 Campsites	2	100	85%	85	2.03	173	50%	10	863	50%	64	5,522	6,385		
Campgrounds (≥6,320 ac) ¹³	60 Campsites	1	60	85%	51	2.03	104	50%	10	518	50%	64	3,313	3,831		
Farmstay ⁷	4 Bedrooms	0	0	85%	0	3.35	0	50%	10	0	50%	64	0	0	31,715	19.6
Farmstay ⁷	6 Bedrooms	60	360	85%	306	3.35	1,025	50%	10	5,126	50%	64	32,803	37,929		
Subtotal		100	1,370				2,769			13,846			88,610	102,456	89,396	14.6
PROPOSED EDUCATIONAL TOURS, RECREATIONAL ACTIVITIES, AND EVENTS																
Use	Size	New Sites	Max per Year	Annual Total	ADT Rate	ADT	AADT	Local %	Within County Length ⁴	Local VMT	Regional %	Out of County Length ⁵	Regional VMT	Total VMT	Final EIR Total VMT Calculation	% Change
Small Tour ⁸	15 Attendees	30	128	57,600	1	57,600	158	75%	26	3,122	25%	77	3,034	6,156	6,156	0.0
Other Education (≤100 ac) ⁹	80 Attendees	20	24	38,400	1	38,400	105	75%	26	2,075	25%	77	2,016	4,091	4,091	0.0
Other Education (100-320 ac) ⁹	120 Attendees	20	24	57,600	1	57,600	158	75%	26	3,122	25%	77	3,034	6,156	6,156	0.0
Other Education (≥320 ac) ⁹	150 Attendees	20	24	72,000	1	72,000	197	75%	26	3,893	25%	77	3,782	7,675	7,675	0.0
Fishing/Hunting ¹⁰	20 Participants	5	100	10,000	1	10,000	27	75%	26	534	25%	77	518	1,052	1,052	0.0
Horseback Riding ¹¹	24 Participants	20	100	48,000	1	48,000	132	75%	26	2,609	25%	77	2,534	5,143	5,143	0.0
Small-Scale Events ¹²	50 Attendees	25	12	15,000	1	15,000	41	50%	26	534	50%	77	1,582	2,116	3,404	-37.8
Small-Scale Events ¹²	100 Attendees	25	12	30,000	1	30,000	82	50%	26	1,068	50%	77	3,164	4,232	5,106	-17.1
Small-Scale Events ¹²	200 Attendees	25	12	60,000	1	60,000	164	50%	26	2,137	50%	77	6,329	8,466	6,344	33.4
Small-Scale Events (large Premises) ¹⁴	500 Attendees	2	25	25,000	1	25,000	68	50%	26	890	50%	77	10,548	14,110	0	--
Subtotal		192		413,600			1,133			19,984			28,630	48,614	45,127	7.7
TOTALS		292					3,902			33,830			117,240	151,070	134,523	12.3

Notes:

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

² Day trips assume 10 miles per trip to local area.

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

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

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

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

⁷ Trip Generation based on ITE Code #320 (Motel).

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

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

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

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

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

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

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

Source: ATE 2023; Final EIR Appendix E.

Table 3. Estimated Maximum Daily Operational Emissions (Proposed Planning Commission Revisions) (lbs/day)

Category	Pollutant					
	ROC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Area	0.00	0.00	0.00	0.00	0.00	0.00
Energy	0.00	0.00	0.00	0.00	0.00	0.00
Mobile	28.57	57.49	390.30	0.91	104.73	28.45
Project Total	28.57	57.49	390.30	0.91	104.73	28.45
Project Total with 12.3% Increase	32.08	64.56	438.31	1.02	117.61	31.95
<i>SBCAPCD and County Vehicle Source Emissions Threshold</i>	25	25	--	--	--	--
Threshold Exceeded?	Yes	Yes	--	--	--	--
<i>SBCAPCD and County Area + Vehicle Source Emissions Thresholds</i>	55	55	--	--	80	--
Threshold Exceeded?	No	Yes	--	--	Yes	--

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

Project Mobile-Source GHG Impacts

Summary of Project GHG Impacts Presented in the Final EIR

Impacts associated with Project-related increases in GHG emissions within the county are described in detail under Impact GHG-1 in Section 3.7, *Greenhouse Gas Emissions* of the Final EIR. As described therein, utilizing the broad buildout/use assumptions and VMT estimates detailed in Section 3.13, *Transportation*, the Final EIR estimated that the proposed Project would generate an estimated 15,477 metric tons of carbon dioxide equivalent (MT CO₂e) per year, with an estimated daily service population of 2,118, and resulting in approximately 7.31 MT CO₂e per service population per year. These GHG emissions estimates would exceed the County’s adopted threshold of 3.8 MT CO₂e per service population per. Therefore, under Impact GHG-1, the Final EIR concluded that based on the established thresholds and the inability to effectively reduce VMT and associated mobile-source emissions associated with the proposed Project, the increase in GHG emissions per capita would be *significant and unavoidable*.

Change in GHG Calculations under Planning Commission Revisions

Based on the analysis of VMT impacts provided above, implementation of the Planning Commission’s proposed revisions would increase estimated VMT by roughly 12.3 percent from that estimated for the proposed Project in the Final EIR. In addition, the increase in the size of campgrounds allowed under the program for larger agricultural parcels would result in an increase in daily service population. The daily service population resulting from implementation of the proposed Project, as revised by the Planning Commission, is presented in **Table 4**.

Table 4. Project Service Population Assumptions (Proposed Planning Commission Revisions)

Use	Size	New Sites	Total	Occupancy Rate	Daily Service Population	Final EIR Daily Service Population Calculation	% Change
Proposed Lodging							
Campgrounds (<100 ac)	15 Campsites	10	150	85%	128	766	12.1
Campgrounds (100-320 ac)	20 Campsites	15	300		255		
Campgrounds (>320 ac)	30 Campsites	8	240		204		
Campgrounds (>2,320 ac)	40 Campsites	4	160		136		
Campgrounds (>4,320 ac)	50 Campsites	2	100		85		
Campgrounds (≥6,320 ac)	60 Campsites	1	60		51		
Farmstay	4 Bedrooms	0	0	0	255	20.0	
Farmstay	6 Bedrooms	60	360	306			
Total	--	100	--	--	1,165	1,021	14.2
Use	Size	New Sites	Max Per Year	Annual Attendance	Average Daily Service Population	Final EIR Calculation	% Change
Proposed Educational Tours, Recreational Activities, and Events							
Small Tour	15 Attendees	30	128	57,600	158	158	0.0
Other Education (≤100 ac)	80 Attendees	20	24	38,400	105	105	0.0
Other Education (100-320 ac)	120 Attendees	20	24	57,600	158	158	0.0
Other Education (≥320 ac)	150 Attendees	20	24	72,000	197	197	0.0
Fishing/Hunting	20 Participants	5	100	10,000	27	27	0.0
Horseback Riding	24 Participants	20	100	48,000	132	132	0.0
Small-Scale Events	50 Attendees	25	12	15,000	41	66	-37.9
Small-Scale Events	100 Attendees	25	12	30,000	82	99	-17.2
Small-Scale Events	200 Attendees	25	12	60,000	164	123	33.3
Small-Scale Events (Large Premises)	500 Attendees	2	25	25,000	68	0	--
Total	--	192	--	413,600	1,133	1,098	3.2
Project Total Service Population					2,298	2,118	8.5

Similar to criteria air pollutants, operational GHG emissions would increase proportional to the increase in VMT. Updated calculations for the proportional increase in operational GHG emissions, including calculation of GHG emissions per service population, under the revised use assumptions and comparison to the emissions calculations presented in the Final EIR are presented in **Table 5**.

Table 5. Estimated Operational GHG Emissions (Proposed Planning Commission Revisions)

Category	Revised Project	Final EIR Calculation	% Change
	MT CO ₂ e/year	MT CO ₂ e/year	
Total Annual GHG Emissions	17,381	15,477	20.2
Project Service Population	2,298	2,118	18.2
Annual GHG Emissions/Service Population	7.56	7.31	3.5
Interim GHG Significance Threshold	3.8	3.8	--
Santa Barbara 2024 GHG Significance Threshold (Residential / Non-residential / Mixed-use)	2.68 / 2.63 / 2.67	2.68 / 2.63 / 2.67	--
Threshold Exceeded?	Yes	Yes	--

Based on this analysis, the calculated increase in estimated per service population GHG emissions resulting from the Agricultural Enterprise Ordinance, as revised by the Planning Commission, would continue to exceed the County's threshold of 3.8 MT CO₂e per service population per year. Impacts associated with the Planning Commission's proposed revisions would remain *significant and unavoidable* and similar to those impacts described under Impact GHG-1 of the Final EIR. No new significant impacts or substantial changes in the severity of impacts would occur as a result of the proposed revisions.

Consideration of New Santa Barbara County GHG Significance Thresholds

As discussed in Section 3.7, *Greenhouse Gas Emissions*, after the County did not meet the 2020 GHG emission reduction goals contained within the Energy and Climate Action Plan (ECAP), the County began work updated the ECAP, GHG emissions forecasts, reduction targets, and GHG emissions reduction programs and policies as part of the SB County 2030 Climate Action Plan. At the time of preparation of the Draft and Final EIR, the County had not yet finalized the 2030 Climate Action Plan. As such, the EIR evaluated GHG impacts of the proposed Project by utilizing the County's interim GHG significance threshold of 3.8 MT CO₂e per service population, per year of GHG. However, following completion of the Final EIR, on August 28, 2024, the County staff finalized and the Board of Supervisors adopted the 2030 Climate Action Plan, along with amendments to the County's *Environmental Thresholds and Guidelines Manual* to replace the interim GHG significance threshold with new GHG thresholds of significance that are based upon the new GHG reduction targets. The newly adopted GHG thresholds replace the interim significance threshold with three new GHG efficiency thresholds, as follows:

- Residential Projects: 2.68 MT CO₂e per resident
- Non-residential Projects: 2.63 MT CO₂e per employee
- Mixed-use Projects: 2.67 MT CO₂e per service population

While the proposed Project involves a land use program that does not propose any new residential or employment-generating uses, the estimated per capita GHG emissions presented in **Table 5** have also been compared against each of these new GHG efficiency thresholds. As presented therein, both the proposed Project described in Final EIR and revised Project described in this memorandum would exceed these newly adopted thresholds, and impacts would remain *significant and unavoidable* and similar to those impacts described under Impact GHG-1 of the Final EIR. No new significant impacts or substantial changes in the severity of impacts would occur as a result of the proposed revisions or adoption of the 2030 Climate Action Plan and updated GHG significance thresholds.

Conclusions

Incorporation of the Planning Commission's recommended changes to the Agricultural Enterprise Ordinance would result in an increase in service population, vehicle trips, VMT, and mobile-source emissions. The proposed changes to the Project Description regarding allowed levels of use would result in an estimated 12.3 percent increase over the VMT and mobile-source criteria pollutant emissions, as well as a 3.5 percent increase in per service population GHG emissions over what was presented in the Final EIR. The Planning Commission's revisions would result in an increase in related impacts; however, the revisions would not substantially change the significance findings presented in the Final EIR. Impacts related to increases in total county VMT, mobile-source criteria air pollutant emissions, and per capita GHG emissions would remain significant and unavoidable due largely to the rural visitor-serving nature of the Project and the inability to effectively reduce or mitigate VMT.

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