



**COUNTY OF SANTA BARBARA
PLANNING AND DEVELOPMENT**

MEMORANDUM

TO: Santa Barbara County Planning Commission

FROM: Mindy Fogg, Interim Deputy Director
Long Range Planning Division

DATE: September 7, 2016

RE: Gaviota Coast Plan
County Planning Commission Hearing of September 14, 2016
Case Nos. 13GPA-00000-00006, 13GPA-00000-00007, 13ORD-00000-00006,
13ORD-00000-00007, 13RZN-00000-00002, and 13RZN-00000-00003

At the August 31, 2016 hearing, the County Planning Commission considered of the Gaviota Coast Plan (GCP), received testimony from the public, asked additional questions of staff, and continued the hearing to September 14, 2016. This memo responds to the Planning Commission's questions of August 31, 2016. Staff recommends that the Planning Commission consider staff responses and new information, and follow the recommendations and procedures in Section V to recommend the Board of Supervisors approve the GCP and associated resolutions and ordinances and certify the EIR, including a Revision Letter to be drafted by staff.

I. Response to Ordinance Questions

At the August 31, 2016 hearing, the Planning Commission gave direction to staff regarding edits to the proposed ordinance amendments addressing small scale composting, small scale campgrounds, the height limit within the Critical Viewshed Corridor (CVC) Overlay, the ESH-GAV Overlay, farmstays, second dwellings allowed under the incentive program, and farmstands. This direction has been incorporated into revised ordinance amendments, which are attached to this memorandum (CLUDC Attachment D-2 and Article II Attachment D-5). The Planning Commission directed staff to address additional questions regarding the ordinance amendments. These are discussed below.

A. *Small Scale Campgrounds – Recreational Vehicle (RV) Size Limits*

The Planning Commission requested staff return with additional information regarding size limits for the allowance of RVs in a small scale campground and recommendations as to how to regulate RVs while still maintaining the purpose and intent of the small scale campground.

Staff researched camper/trailer size restrictions applied at California State Parks campgrounds, and size variables of small scale campers and trailers. As the campground envisioned by the GavPAC is limited and small in scale, staff recommends that campsite vehicle parking be limited to a length of 25 feet. This length would accommodate a standard size RV, a small camper trailer and its towing vehicle (car or pickup truck), or a small camper such as a camper shell mounted on a pickup truck.

B. Farmstay

The Planning Commission requested additional information regarding the draft ordinance provisions that require the cost of meals provided to guests of the farmstay be included in the total price of the overnight accommodations. Staff drafted the ordinance provisions for the farmstay to be consistent with the California Homestay Act of 1999, in particular Health and Safety Code Section 113893. Including the cost of food provided to guests in the cost of the overnight accommodations is one of the features that enables a farmstay to be exempt from Public Health Department requirements for a commercial kitchen, which would add significant costs to a farmstay applicant for both permitting (Public Health and Building Permits) and construction (kitchen remodel).

Staff recommends maintaining the current draft ordinance language. The language would not require a farmstay to provide food, only that the cost of any food that is provided be included in the total price of the accommodations and not charged separately. These provisions would further ensure that the farmstay remains a small operation in support of the primary agricultural use of the property.

C. Incentive Program Dwelling Units and Remote Siting

The Planning Commission directed staff to develop new ordinance provisions for dwelling units allowed under the incentive program and include the ordinance provisions in the Gaviota Coast Plan Overlay instead of the Residential Second Unit section. Following the Commission's direction, staff has prepared new ordinance language included in the County Land Use and Development Code (Attachment D-2 pp. 28-33) and Article II Coastal Zoning Ordinance (Attachment D-5, pp. 39-44), created a new term for the use, Incentive Dwelling Unit, and created specific development standards and findings.

The Commission also requested that staff research the expired Residential Agricultural Unit (RAU) Ordinance for guidance regarding remote siting of new detached units as an option for the Commission's consideration. The Board of Supervisors-initiated Action LU-6 states that detached units shall be clustered with the principal dwelling. In addition, the EIR did not analyze the potential impacts of new remotely sited dwellings under the incentive program, as new dwellings would be clustered with existing dwellings. However, the proposed ordinance amendments (Attachment D-2 p. 29, Attachment D-5 p. 41) would allow conversion of an existing legal guesthouse or agricultural employee dwelling to an incentive dwelling even if the dwelling unit was remotely sited from the principle dwelling. Consideration of new remotely

sited incentive dwelling units could be considered as a part of a work program to fully develop ordinances for the other actions envisioned under the incentive program, Action LU-5.

D. Small Scale Firewood Processing and Sales

The Planning Commission recommended that staff not allow the use of Coast live oaks and chaparral as source wood for small scale firewood processing and sales. Staff reviewed the draft ordinance provisions and recommends that the ordinance language be revised to require that firewood processing and sales comply with the provisions of the Environmentally Sensitive Habitat (ESH and ESH-GAV) Overlays. Complying with the ESH Overlays would limit firewood processing and sales to those sources that are not environmentally sensitive. Staff recommends the same ordinance provisions be incorporated into the new ordinance language for small scale lumber processing/milling.

E. Steep Slope Guidelines for New Agriculture on Steep Slopes

At the August 31, 2016 hearing, several public commenters requested the Steep Slope Guidelines be applied to new agriculture on slopes of 40% or greater instead of 30% or greater. The Planning Commission requested additional information to understand staff's recommendation that they apply on slopes of 30% or greater. In addition, the Planning Commission requested additional information regarding the application of the Mountainous Area land use (MA) and zoning (MT) designations in the GCP area and in other community plan areas.

In the staff memo dated August 24, 2016, at the Planning Commission's request, staff responded to a letter from the Environmental Defense Center (EDC), including a discussion regarding application of the MA designation. The main criteria for designation of land as MA include land with an average slope exceeding 40% and isolated table lands and valleys surrounded by slopes exceeding 40%. As noted in the previous memo, the Comprehensive Plan does not mandate that all lands meeting these criteria be designated MA and the County may use discretion in its application. In other community plan areas, such as Goleta, Eastern Goleta Valley (EGV), and Toro Canyon, the MA designation has been applied to both public and privately-owned lands that meet these criteria. However, in all three of these communities, privately-owned lands that meet these criteria have also been designated Agriculture. Each community's Planning Advisory Committee (PAC), the Planning Commission, and the Board of Supervisors deliberated these options and chose zone districts that best suited each community.

Similarly, during development of the proposed plan, the GavPAC considered its options for the Gaviota Coast. However, Gaviota topography differs from Goleta, EGV, and Toro Canyon. In Goleta, EGV, and Toro Canyon, the upper one-third of the watershed generally meets the MA criteria and has little commercial agriculture. The steep upper watersheds level out to a wide coastal plain before reaching the ocean. Active agriculture is located mostly in the middle and lower portions of the watershed. Along the Gaviota Coast, the topography is significantly different. There are 37 different watersheds. North-south ridges and valleys typically extend from the crest of the Santa Ynez Mountains to Highway 101, with a narrow coastal bluff. Active

agriculture is prevalent throughout. The initiated plan avoids spot zoning and a “patchwork” application of MA and AG based on location of existing agriculture and steep slopes.

With regard to agriculture, the primary difference between the Agriculture (AG) zone and the MT zone is that cultivated agriculture under the AG zone is exempt from any zoning permits. The MT zone requires a permit, typically a Minor Conditional Use Permit for new cultivated agriculture on slopes exceeding 40%. Much of the privately-owned agriculture land is located on land with slopes greater than 40%. One of the goals of the GCP is to continue and enhance the working agricultural landscape. A zoning change that would require discretionary permits for new cultivation over such a large area that has been used for agriculture for more than a century was not considered consistent with this goal.

Ultimately, the Planning Commission and Board of Supervisors initiation plan recommended maintaining the AG designation for the privately-owned lands as it would best suit the goals and objectives for the GCP area. To address concerns regarding new cultivated agriculture on steep slopes, the draft GCP proposed Action AG-3, which directs the County to develop steep slope development standards for agricultural development on slopes of 30 to 40% or greater on agriculturally-zoned land. The Planning Commission and the Board of Supervisors supported this proposal during plan initiation hearings; however, consensus was not reached as to whether to apply the new steep slope standards to slopes greater than 30% or greater than 40%.

During environmental review, the Steep Slope Guidelines developed by the Cachuma Resource Conservation District were determined to serve the purpose of Action AG-3. A permit is not required to use the Steep Slope Guidelines, nor do the Guidelines require a permit. Rather, the Steep Slope Guidelines provide direction to implement erosion control best management practices (BMPs) to avoid, minimize, and mitigate potential effects that could result from cultivation on slopes. These BMPs address a wide range of practices such as siting areas of new cultivation, avoiding slopes prone to landslides, water supply and irrigation, soil quality, land clearing, ag road construction, drainage, cover crops, etc. However, the Guidelines do not limit applicability to slopes greater than 40% and the recommended BMPs could be used on slopes less than 30%. The EIR also did not indicate whether they should apply to slopes greater than 30% or 40%. Given this absence of direction, staff considered other existing regulations for guidance.

The County’s Grading Ordinance exempts agricultural grading from the provisions of the Grading Ordinance to prepare a field for a crop or range improvement on slopes of less than 30% (Section 14-8(a)). On steeper slopes, the Grading Ordinance requires an Erosion Control Permit (Section 14-8(b)) issued by the Building Division. To provide the most consistency between regulations, staff recommends that the Steep Slope Guidelines apply to agricultural cultivation located on slopes of 30% or greater on agriculturally zoned lands to ensure slope stabilization, soil conservation, and water quality control.

II. Response to Comment Letters

The Planning Commission directed staff to consider and respond to two letters submitted on August 29, 2016 for the August 31, 2016 hearing. These letters were submitted by the Gaviota Neighbors Group and the County Riding and Hiking Advisory Committee (CRAHTAC).

A. *Gaviota Neighbors Group*

The Gaviota Neighbors Group letter identified 17 issues related to specific proposals within the GCP, the EIR analysis, and the proposed ordinance amendments. The following discussion responds to each comment in order and as presented in the letter.

1. *GCP Policy LU-1. The GavPlan should not designate natural resource protection as its over-arching goal.*

The new language added to GCP Policy LU-1 is a restatement of Coastal Land Use Plan (CLUP) Policy 1-2 and would only apply to the Coastal Zone of the GCP. Once certified by the Coastal Commission, the GCP becomes a part of the CLUP and Policy 1-2 would apply, whether or not the language is added to GCP Policy LU-1.

2. *Agricultural Tiered Permit Structure (Ordinance Amendments Section 35-460). The agricultural permit program should not have been ignored.*

The Gaviota Agricultural Tiered Permit Structure has been incorporated into the proposed ordinance amendments following the recommended ordinance amendments that were initiated by the Board of Supervisors in December 2013. The only difference is that staff recommended that certain uses proposed to be exempt in the Coastal Zone require a Coastal Development Permit (CDP) since they meet the Coastal Act's definition of development. The reasons for staff's recommendation are more fully discussed in the Staff Report dated July 20, 2016 and the Staff Memo dated August 24, 2016 (pp. 11-12), which summarizes the differences between CDP exemptions and the Coastal Commission's Categorical Exclusion Process for excluding certain categories of development from the CDP requirements of the Coastal Act. The Planning Commission may recommend adding an action item to the plan directing the County to pursue a Categorical Exclusion as a means of achieving these goals.

- 3-4. *Mountainous Zoning and Steep Slope Standards Retain the GavPAC's recommendation that Mountainous Zoning only be applied to public lands and only apply the steep slope guidelines to slopes greater than 40%.*

Staff continues to recommend maintaining Agriculture land use and zoning designations for private lands within the GCP area while applying Mountainous Area to public lands. This recommendation follows the proposed land use and zoning initiated by the Board of Supervisors in December 2013. Staff recommends that the Steep Slope Guidelines be

applied to new agricultural cultivation on slopes of 30% or greater for the reasons discussed under Section I.E of this Staff Memo, above.

5. *ESH Chaparral Designation. Remove the designation of chaparral and coastal scrub ESH; it will generate unnecessary impacts to agriculture.*

The designation of chaparral and coastal scrub as ESH does not apply to all chaparral and coastal scrub habitats. Rather it applies to specific types of chaparral and coastal scrub, listed in Policy NS-4 and ranked as rare according to the California Natural Diversity Database (CNDDDB) (see also pages 2-2 to 2-3 and Appendix B of the GCP for more information). As discussed in the EIR, the designation of these rare types of chaparral and coastal scrub will not significantly impact agriculture because the ESH-GAV Overlay proposes to exempt agricultural activities from the provisions of the overlay.

6. *ESHA Mapping Requirements. Regarding Dev Std NS-3, Dev Std NS-4, and Dev Std NS-5, any survey and mapping that may be necessary should focus exclusively on the project site and not the entire parcel.*

Dev Std NS-3, Dev Std NS-4, and Dev Std NS-5 were identified as required mitigation measures to mitigate impacts to biological resources that could result from new development. These development standards would apply to new development projects and any surveys and mapping, if required, would be limited to the footprint of ground disturbance associated with the new development. Surveys and mapping would not be required for entire parcels unless the entire parcel would be disturbed by the proposed development project.

7. *ESH Setbacks and Buffers. Regarding Dev Std NS-2, retain the edge of a buffer to be at the top-of-bank and not the edge of canopy.*

Dev Std NS-2 proposes a setback buffer of 100 feet from the top-of-bank or the edge of riparian vegetation, whichever is further. This buffer was initiated by the Board of Supervisors in December 2013.

8. *Public Recreation and Open Space Acquisition. Reject action REC-9 or restrict to voluntary discussions between a landowner who has initiated a discretionary permit and County staff.*

Action REC-9 was created by combining components of two actions proposed in Alternative 2 of the EIR. The EIR alternatives analysis therefore analyzed the impacts of this action. In addition, this is an action that the County would undertake at some unspecified time in the future, and as drafted, the action does not identify any property that could be affected.

9. Willing Seller or “No-Takings” Language should be restored under the Trails Map Definition and Standards.

The proposed edit to item 2 under the PRT Map Definitions and Standards (p. 4-9 of the GCP) is for clarity and grammatical purposes only and does not establish policy. The version of Policy REC-3 initiated by the Planning Commission and Board of Supervisors retains eminent domain, subject to state and federal law, as one of several options, including working with willing landowners, to establish public trails.

10. Incentives/Residential Second Units (RSUs). Restore the Plan’s designation of Alternative 3, which allows RSUs based on a range of incentives including conservation and agricultural easements.

The Land Use Incentive Program (GCP Action LU-4) is a program to support and increase agricultural viability, public access, enhance habitat preservation and restoration opportunities, and preserve rural character within the Plan area. The program is voluntary and Action LU-5 identifies landowner actions which warrant the ability to apply for an additional dwelling unit (i.e. eligible incentive) on AG-II zone lands within the Plan area.

The proposed GCP includes a revised Action LU-5 which incorporates the expanded land uses incentives from EIR Alternative 3. To implement the Land Use Incentive Program, staff drafted zoning ordinance requirements (Attachment D-2, LUDC Section 35.28.210.I) (Attachment D-5, Article II Section 35-470) for permitting an incentive dwelling unit on AG-II zone lands in the Plan area. If a landowner dedicates a trail easement for the Coastal Trail Primary Route Alignment, the landowner would be eligible to apply for one detached and one attached incentive dwelling unit (formerly referred to as a RSU). If a landowner dedicates a trail easement (non-Coastal Trail Primary Route) for a trail on the adopted PRT Map, or dedicates and/or constructs a public trailhead parking area, the landowner would be eligible to apply for one incentive dwelling unit (either detached or attached).

Staff has not drafted ordinance language for the additional landowner actions (e.g. perform habitat restoration; dedicate permanent agricultural, conservation, or scenic viewshed easement; and restore, maintain, and/or landmark a historic structure). To develop ordinance requirements for these landowner actions is a difficult and complex undertaking, requiring additional analysis and public input to establish the proportionality of proposed actions and demonstrated public benefit, and should be pursued as a future work program project.

11-12. Visual Resources Guidelines. Retain the Plan’s Site Design Hierarchy and Site Design Guidelines. Reject arbitrary caps on the size of private residences.

In response to Planning Commission questions, staff presented information regarding development trends for private residences in the GCP area on August 31, 2016. The Commission has not provided direction to require a maximum size limit for new residences. Neither the Planning Commission nor the Board of Supervisors included house size limits in the initiated plan.

13. Trail Siting Guidelines. Restore to the Guidelines the section that addressed privacy and security. Without these protections, there can be bridges and trails that scar the landscape.

The draft Trail Siting Guidelines were not developed during the public GavPAC process but were initially developed by an ad hoc group of interested community members, landowners, and trail advocates. A draft version of the guidelines was submitted by the ad hoc group to staff for consideration prior to release of the draft EIR. The Trail Siting Guidelines have been revised by Planning and Development and County Parks staff to greater align with similar guidelines adopted for other community and area plans. Staff edits remove elements that do not pertain to trail siting, and provide flexibility for future siting efforts. The guidelines are not intended to be a policy document and specific text creating policy within the Guidelines was removed. The Trail Siting Guidelines continue to provide siting direction to minimize conflicts with visual resources and protect geology (Section III.B), biological and natural resources (Section III.C), cultural resources, (Section III.D), and agriculture (Section IV). Design Guidelines apply to structures; therefore, it would be inappropriate to apply them to trails. However, based on the proposed ordinance amendments, buildings and structures would require design review and application of the Design Guidelines. Therefore, recreational structures such as a bridge or restroom building would undergo design review.

14. General Siting Principles (Goal REC-1, Policy REC-1 and Policy REC-2). The PRT Chapter and the environmental analysis does not analyze the reasonable worst case conditions of an expanded trail system and divulge the negative impacts to agricultural and natural resources.

The EIR analyzed the potential impacts of buildout of the proposed trail system in Chapter 4.13 (the worse-case scenario). The EIR concluded that impacts to agricultural resources, biological resources and cultural resources would be significant and unmitigable after applying feasible mitigation measures.

15. Fire Hazard Reduction Program (Policy AG-3.A). Allow range improvement (> 5,000 sq. ft. per year) to protect and enhance agricultural resources. Do not declare chaparral and coastal scrub as ESH.

As discussed in response to comment number 5 above, only rare types of chaparral and coastal scrub would be designated ESH and agricultural activities would be exempt from the provisions of the ESH-GAV Overlay.

16. *Fire Protection. Reject Dev Std LU-3 which allows the County further influence over the siting of future building sites.*

Proposed Dev Std LU-3 provides one additional tool to consider when siting new development, in this case providing for additional safety from wildfires. Implementation of this development standard would be considered to complement the Site Design Hierarchy and Design Guidelines for new development but with an emphasis on safety.

17. *Mitigation Banks (Action NS-6). Support mitigation banks or an in-lieu fee program as an alternative policy approach to mitigation.*

The commenter states support for Action NS-6. No response is necessary.

B. CRAHTAC

The CRAHTAC letter dated August 29, 2016 requests revisions to text and policy within the Parks, Recreation, and Trails (PRT) chapter of the GCP. The Planning Commission directed staff to review the letter and return with a recommendation as to whether any of the suggested revisions should be incorporated into the GCP.

Staff reviewed the letter and recommends incorporating some of the revisions, with certain modifications to language. Staff's recommended revisions are presented in Attachment A, with the newly proposed revisions highlighted in yellow. Staff recommends these revisions because they would clarify policy direction and reflect the intent of the PRT maps, but would not substantively change the policy direction of the initiated GCP. Staff does not recommend applying the Proposed Public or Private Park/Recreational Facility Overlay to the Las Flores/Coral Canyon and Gaviota Marine Terminal properties. Policy LU-9 (Gaviota Marine Terminal Reuse) and Policy REC-21 (Las Flores Canyon) provide policy consideration for recreational and open space uses as part of decommissioning and reuse plans for these properties. Application of the overlay to these private land holdings was not analyzed as part of the EIR.

III. Other Plan Policies Responses and Recommendations

On August 31st, the Planning Commission directed staff to incorporate the recommended edits to Cultural Resources and Wastewater Treatment as presented by staff at the hearing. These edits have been incorporated into the plan and are presented in Attachment A of this staff memo. The Planning Commission also directed staff to address several additional policy topics.

A. PRT – Trail Fencing

At the Planning Commission hearing of August 31, 2016, several members of the public commented that removal of language from the draft Trail Siting Guidelines addressing fencing and security of private property would result in landowners having no say in the type of fencing

that would be used to provide security, safety, or the prevention of trespass from new trails. As was discussed at the August 31st hearing, the Trail Siting Guidelines were revised to remove policy statements from the guidelines to maintain the purpose as a guidance document for trail siting and construction. At the hearing, County Parks staff clarified the process of consultation with landowners during trail planning and siting. Staff relies on landowners to express their needs to protect property and agriculture adjacent to trails so that Parks can develop a trail with proper fencing in a manner that serves both the landowner and the trail user. The proposed Trail Siting Guidelines (Section IV) include a guideline that addresses fencing to protect agriculture. To clarify this direction, staff recommends it be revised as follows (new revision highlighted):

During the planning process for specific trail segments, County Parks ~~would~~ shall assess the need for trail fencing. County Parks shall determine on a case-by-case basis appropriate fencing design and type, as necessary. The County ~~should~~ shall consider landowner input on fence design to ensure agriculture is not negatively affected. To the greatest extent feasible, fencing should not hinder the natural movement and migration of animals and should be aesthetically pleasing.

B. Action NS-7

The Planning Commission directed staff to revise Action NS-7 Vegetation Mapping to state that the County “shall” seek funding rather than “should” seek funding. This change has been made and is incorporated into Attachment A of this staff memo.

C. Visual Resources Policies

The Planning Commission directed staff to review the several visual resources policies that address public views from within the Critical Viewshed Corridor (CVC) Overlay (Policies VIS-12 and VIS-13) and elsewhere (Policies VIS-2 and VIS-3). At issue is whether the policies should protect public views from Highway 101 or from the Union Pacific Railroad and/or any other public viewsheds (such as other public roads and trails). Since releasing the staff memo for the August 31, 2016, staff conducted additional research into the genesis of the initiated plan policy language and recommends that the Planning Commission maintain the policy language as presented in the July 2016 Draft GCP (Attachment A of the Staff Report dated July 20, 2016).

Policy VIS-2 is intended to apply outside the CVC Overlay, where the rest of the GCP’s Visual Resources Policies, the Site Design Hierarchy, and the Design Guidelines will address protection of these public views. Revision of Policy VIS-2 is not necessary to make it apply within the CVC Overlay because the Overlay already would provide additional viewshed protection. In addition, Policies VIS-12 and VIS-13 direct the protection of views and screening of development as seen from Highway 101. These policies are intended to specifically address the public viewshed from Highway 101. As presented in Chapter 6 of the initiated GCP, “the near-field views on the south and portions on the north of the Highway 101 are visually critical and warrant additional protection from the potential impacts of development. Therefore, a Critical Viewshed Corridor Overlay as been created ...” The CVC Overlay is intended to place higher

standards of review on development seen from Highway 101. Therefore, Policies VIS-2, VIS-12, and VIS-13 do not need to be expanded to protect public views outside of the scope of the CVC Overlay because the rest of the GCP's Visual Resources Policies, the Site Design Hierarchy, and the Design Guidelines will address protection of these public views.

During the Planning Commission's initiation hearings, Policy VIS-3 Skyline Intrusion, was intentionally revised to state that development shall not intrude into the skyline from public viewing places "where feasible." A public comment requested that "where feasible" be stricken so that the policy would mirror CLUP Policy 4-3 or else be inconsistent. Staff believes the initiated language is consistent and does not recommend changing it. Although the coastal version of the policy does not provide apparent flexibility, practical application of CLUP Policy 4-3 requires consideration of feasibility depending on individual site constraints and the perspective of the viewer's location.

D. Wetland Mitigation Policies

The Planning Commission directed staff to respond to specific comments made by EDC in its letter dated August 29, 2016 regarding proposed GCP wetland policies. The EDC letter makes two comments regarding this issue: 1) the GCP policies are not consistent with Coastal Act Section 30233 and CLUP Policies 9-6 and 9-9 [which restate Section 30233]; and 2) the mitigation ratios suggested in GCP Dev Std NS-5 are inconsistent with Coastal Act standard practices.

First, the County's CLUP Policies 9-6 and 9-9, which reiterate Coastal Act Section 30233, describe uses allowed within wetlands and define wetland boundaries and buffers. These policies will still apply to wetlands within the Coastal Zone of the GCP. The GCP does not propose to replace these policies; rather, the GCP provides complementary and supplementary policies, which support the existing CLUP wetland protection policies. It is not necessary to restate these policies in the GCP.

Second, Dev Std NS-5 is a mitigation measure that requires wetland surveys and delineations where wetlands may potentially exist as part of a development proposal. The development standards identifies a range of appropriate mitigation ratios for impacted wetlands and riparian habitats, including 2:1 and 3:1 but which may be as high as 8:1 for especially rare or valuable wetland types. The intent of the development standard is to allow discretion to apply the most appropriate mitigation ratio depending on the type of wetland and extent of impact. Dev Std NS-5 would apply throughout the GCP area not just within the Coastal Zone; however, it allows flexibility to apply a higher standard when required by the Coastal Act.

E. Caltrans Recommendations

Caltrans submitted a letter dated August 29, 2016 expressing general support for the GCP's discussion of transportation planning issues. Caltrans also requests several minor edits for correct terminology use such as "interchange" and "intersection," and "bikeways" and "paths,"

and the correct reference to the *US 101 Transportation Concept Report*. Staff recommends making these edits and will forward them to the Board of Supervisors upon the Planning Commission's recommendation.

F. Highway 101 – Rural Expressway

The Planning Commission requested staff respond to public comment expressing interest in designating Highway 101 through the GCP area as a rural expressway. Figure 7-1 of the GCP depicts the Regional Transportation Network and reflects the current function of Highway 101 through the GCP area as both freeway and expressway. The Planning Commission and Board of Supervisors did not recommend a Circulation Element amendment to revise the Highway 101 roadway classification through the GCP area. The County's roadway classifications for state highways do not affect or limit Caltrans' ability to pursue transportation corridor planning.

IV. Minor Edits and Errata

A. Comprehensive Plan Consistency

Staff has made minor revisions to the policy consistency analysis (Attachment C) to reflect the policy edits recommended by the Planning Commission. The GCP, as proposed with the Planning Commission's recommended changes, would be consistent with the Comprehensive Plan, including the CLUP.

B. Environmental Review

Staff has identified typographic errors and other errata since release of the Draft FEIR, several of which were discussed in the staff memo dated August 24, 2016. Should the Planning Commission recommend any or all of the changes to the GCP discussed in this memo, the memo dated August 24, 2016, and at any of the Planning Commission's hearings (July 27, August 31, and September 14, 2016), staff will prepare a revision letter to the Draft FEIR to address the recommended changes to the GCP. The revision letter will be added to the Draft FEIR when it is forwarded to the Board of Supervisors with the Planning Commission's recommendation. As discussed in the staff report dated July 20, 2016, the Phillips 66 Rail Spur project has been added to the list of cumulative projects, and revised responses provided to comment letters from the Environmental Defense Center and the Office of Marc Chytilo. These changes will be presented to the Board of Supervisors in the Draft FEIR.

C. Findings

Staff has made minor revisions to the findings and statement of overriding considerations to be consistent with the recommended minor changes to the GCP (Attachment B).

V. Recommendations and Procedures

Follow the procedures outlined below and recommend that the Board of Supervisors approve Case Nos. 13GPA-00000-00006, 13GPA-00000-00007, 13ORD-00000-00006, 13ORD-00000-00007, 13RZN-00000-00002, and 13RZN-00000-00003 based upon the project's consistency with the Comprehensive Plan, including the Local Coastal Program, and based on the ability to make the required findings, including CEQA findings. The County Planning Commission's motion should include the following:

1. Make the findings for approval, including CEQA findings, and recommend that the Board of Supervisors make the appropriate findings for approval of the proposed Comprehensive Plan amendments, ordinance amendments, and zoning map amendments (Attachment B).
2. Recommend that the Board of Supervisors certify the Gaviota Coast Plan Draft Final Environmental Impact Report (County Environmental Document No. 15EIR-00000-00003, State Clearinghouse No. 2014011027) (Attachment C of the Staff Report dated July 20, 2016), including an EIR Revision Letter to be drafted by staff. .
3. Approve and adopt a Resolution (Attachment D) to recommend that the Board of Supervisors adopt the Gaviota Coast Plan as revised by the Planning Commission on September 14, 2016 by taking the following actions:
 - A. Approve and adopt a Resolution amending the text and maps of the Land Use Element (Case No. 13GPA-00000-00006) of the Santa Barbara County Comprehensive Plan (Attachment D-1 of the Staff Report dated July 20, 2016), incorporating revisions to the Gaviota Coast Plan made by the Planning Commission on September 14, 2016;
 - B. Approve and adopt an Ordinance amending the zoning regulations of the County Land Use and Development Code (Case No. 13ORD-00000-00006), Section 35-1 of Chapter 35, Zoning, of the Santa Barbara County Code (Attachment D-2), incorporating revisions made by the Planning Commission on September 14, 2016;
 - C. Approve and adopt an Ordinance amending and adding new zones and overlay zones to the County Zoning Map (Case No. 13RZN-00000-00002) of the County Land Use and Development Code (Attachment D-3 of the Staff Report dated July 20, 2016);
 - D. Approve and adopt a Resolution amending the text and maps of the Coastal Land Use Plan (Case No. 13GPA-00000-00007) of the Santa Barbara County Local Coastal Program (Attachment D-4 of the Staff Report dated July 20, 2016), incorporating revisions to the Gaviota Coast Plan made by the Planning Commission on September 14, 2016;

- E. Approve and adopt an Ordinance amending the zoning regulations of the Article II Coastal Zoning Ordinance (Case No. 13ORD-00000-00007) of Chapter 35, Zoning, of the Santa Barbara County Code (Attachment D-5) , incorporating revisions made by the Planning Commission on September 14, 2016;

- F. Approve and adopt an Ordinance amending the Article II Coastal Zoning Ordinance of Chapter 35, Zoning, of the Santa Barbara County Code by repealing and retiring the Gaviota Coast Rural Region Zoning Map, the North Gaviota Coast Rural Region Zoning Map, the Gaviota Coast Coastal Plan Zoning Overlay Map, and the Point Conception Coastal Plan Zoning Overlay Map, and amending the Lompoc Valley Rural Region Zoning Map, and adopting new Gaviota Coast Plan Zoning Maps, new Gaviota Coast Plan Zoning Overlay Maps, and new Gaviota Coast Plan Environmentally Sensitive Habitat Overlay (Case No. 13RZN-00000-00003) (Attachment D-6 of the Staff Report dated July 20, 2016); and

- G. Approve and adopt a Resolution adopting the Gaviota Coast Plan Design Guidelines (Attachment D-7 of the Staff Report dated July 20, 2016).

Refer back to staff if the County Planning Commission takes other than the recommended action for appropriate findings.

ATTACHMENTS

- A. Recommended Edits to Gaviota Coast Plan
- B. Findings for Approval
- C. Policy Consistency Analysis
- D. Planning Commission Resolution
 - D-1. See Attachment D-1 of Staff Report dated July 20, 2016 Board of Supervisors Resolution Amending the Land Use Element (Case No. 13GPA-00000-00006)
 - D-2. Board of Supervisors Ordinance Amending the County Land Use and Development Code (Case No. 13ORD-00000-00006)
 - D-3. See Attachment D-3 of Staff Report dated July 20, 2016 Board of Supervisors Ordinance Amending the County Zoning Map (Case No. 13RZN-00000-00002)
 - D-4. See Attachment D-4 of Staff Report dated July 20, 2016 Board of Supervisors Resolution Amending the Coastal Land Use Plan (Case No. 13GPA-00000-00007)
 - D-5. Board of Supervisors Ordinance Amending the Article II Coastal Zoning Ordinance (Case No. 13ORD-00000-00007)
 - D-6. See Attachment D-6 of Staff Report dated July 20, 2016 Board of Supervisors Ordinance Amending the Article II Coastal Zoning Ordinance of Chapter 35, Zoning, of the Santa Barbara County Code by repealing and retiring the Gaviota Coast Rural Region Zoning Map, the North Gaviota Coast Rural Region Zoning Map, the Gaviota Coast Coastal Plan Zoning Overlay Map, and the Point

Gaviota Coast Plan

Case Nos.: 13GPA-00000-00006, 13GPA-00000-00007, 13ORD-00000-00006, 13ORD-00000-00007, 13RZN-00000-00002, and 13RZN-00000-00003

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Conception Coastal Plan Zoning Overlay Map, and amending the Lompoc Valley Rural Region Zoning Map, and adopting new Gaviota Coast Plan Zoning Maps, new Gaviota Coast Plan Zoning Overlay Maps, and new Gaviota Coast Plan Environmentally Sensitive Habitat Overlay Maps (Case No. 13RZN-00000-00003)

- D-7. See Attachment D-7 of Staff Report dated July 20, 2016 Board of Supervisors Resolution Adopting the Gaviota Coast Plan Design Guidelines

Gaviota Coast Plan

Case Nos.: 13GPA-00000-00006, 13GPA-00000-00007, 13ORD-00000-00006, 13ORD-00000-00007, 13RZN-00000-00002, and 13RZN-00000-00003

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ATTACHMENT A

Additional Recommended Edits to Gaviota Coast Plan

Attached herein are replacement pages for the Gaviota Coast Plan that reflect minor edits to text and revisions to policies and development standards as recommended by the Planning Commission at the adoption hearings of July 27, August 31, and September 14, 2016. These changes are presented in double strikethrough and double underline text and highlighted in yellow.

The recommended edits in this attachment include edits to Cultural Stewardship and Wastewater Treatment policies and development standards presented at the August 31, 2016 Planning Commission hearing, a new recommended edit to clarify Dev Std AG-3, and new recommended edits to the Parks, Recreation and Trails chapter presented in the Staff Memo to the Planning Commission dated September 7, 2016.

Edits depicted in single strikethrough and underline represent staff's previous recommended edits that were presented to the Planning Commission and the public in Attachment A to the Staff Report dated July 20, 2016.

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coastal lagoons, coastal watersheds, and removal of barriers along streams and creeks to restore fish passage and wildlife movement.

Action NS-6: Mitigation Banks. Within the Gaviota Coast Plan area, the County should consider developing mitigation banks or an in lieu fee program as alternative policy approaches.

Action NS-7: Vegetation Mapping. Within the Gaviota Coast Area, the County ~~should~~ **shall** seek funding to map biological habitats using Manual of California Vegetation or other ecologically accepted mapping criteria.

c. Natural Resources Stewardship Development Standards

Dev Std NS-1: Wildlife Corridors. Environmental review of development proposals shall evaluate and mitigate for the significant effects on wildlife movement caused by fencing, roads, lighting, and siting.

Dev Std NS-2: ESH Setbacks and Buffers. (INLAND) Mapped riparian ESH-GAV overlay areas shall have a development area setback buffer of 100 feet from the edge of either side of the top-of-bank of creeks or the existing edge of riparian vegetation, whichever is further. Development within other ESH areas shall be required, ~~subject to the list below,~~ to include setbacks or undeveloped buffer zones from these areas as part of the proposed development, except where setbacks or buffers would preclude reasonable use of the parcel. In determining the location, width and extent of setbacks and/or buffer areas, the County’s biological resources and/or vegetation maps and other available data shall be used (e.g., maps, studies, or observations). Appropriate public recreational trails may be allowed within setbacks or buffer areas.

Required buffers for ESH-GAV may be adjusted upward ~~and/or downward in both the Coastal Zone and Inland Area~~ on a case-by-case basis but shall not preclude reasonable use of a parcel. The buffer shall be established based on an investigation of the following factors and, when appropriate, after consultation with the Department of Fish and Wildlife and Regional Water Quality Control Board, if required, in order to protect the biological productivity and water quality of streams:

- Demonstration of a net environmental benefit;
- Existing vegetation, soil type and stability of stream corridors;
- How surface water filters into the ground;
- Slope of the land on either side of the stream;
- Location of the 100 year flood plain boundary; and
- Consistency with adopted Gaviota Coast Plan, ~~Coastal Land Use Plan,~~ and Comprehensive Plan policies.

Dev Std NS-2: ESH Setbacks and Buffers. (COASTAL) Mapped riparian ESH overlay areas shall have a development area setback buffer of 100 feet from the edge of either side of the top-of-bank of creeks or the existing edge of riparian vegetation, whichever is further. Wetland ESH areas shall include a minimum development area setback buffer of 100 feet from the edge the wetland. Monarch butterfly trees shall include a minimum development area setback buffer of 50 feet from the edge of the trees.

Development within other ESH areas shall be required to include setbacks or undeveloped buffer zones from these areas as part of the proposed development, except where setbacks or buffers would preclude reasonable use of the parcel consistent with applicable law. The buffers shall be determined on a case-by-case basis and be based upon site-specific conditions such as slopes, erosion potential,

c. Cultural Resources within the Plan Area.

The rich history of the Gaviota Coast Plan area has left behind a number of important cultural resources including buildings and structures, archaeological and historic sites, Traditional Cultural Properties, [Tribal Cultural Resources](#), and Rural Historic Landscapes.

The Santa Barbara County Coastal Plan cites the ca. 1850 Vicente Ortega Adobe, located between Goleta and Gaviota in Arroyo Hondo, as “probably the most important site within the coastal zone” (June 2009 Republished edition, p. 142). The Coastal Plan also identifies 10 other resources within the Plan Area. In order from west to east, these are:

- Point Conception Lighthouse
- Gaviota Landing
- Gaviota Pass
- Baron Adobe
- La Vigia
- Vincente Ortega Adobe
- Refugio Beach Park
- Erro Pepper Tree
- Ygnacio Ortega Adobe
- Bruno Orella Adobe
- El Capitan Beach Park
- Dos Pueblos (Historic Site, Cabrillo Anchorage)

Other historic resources in the Plan Area may qualify for historic designation. Examples include the prisoner of war branch camp and the Victorian House on the former Edwards Ranch; ‘Casa Grande’ on Dos Pueblos Ranch; and the ‘Western White House’ on the former Reagan Ranch.

The Plan Area contains one California State Historical Landmark, the Gaviota Pass. In addition, the Santa Barbara County Historical Landmarks Advisory Commission (HLAC) has designated two Plan Area resources as County Landmarks and two as Structures of Historical Merit. Designation as a Landmark recognizes the building or site at a high level of historic, aesthetic or cultural significance. A designated Landmark is preserved and protected by conditions restricting its demolition, removal, alteration or use. Plans for alterations to Landmarks are reviewed by the HLAC. Designation as a Structure or Place of Historic Merit officially recognizes the building or site as having historic, aesthetic or cultural value, but does not restrict demolition, removal, alteration or use. The designated County Landmarks are the Orella Adobe and the Las Cruces Adobe. The Vista del Mar School and the Point Conception Lighthouse are both Structures of Merit.



Artist: Chris Chapman

In addition to these historic resources, prehistoric archaeological sites are recorded in the Plan Area. These range from the remains of small, limited activity areas to large villages inhabited by hundreds of individuals over many years.

Other types of cultural resources that may be present within the Plan Area include **Tribal Cultural Resources**, Traditional Cultural Properties, and Rural Historic Landscapes. **Tribal Cultural Resources are those which have cultural value to a California Native American tribe and meet specific criteria defined in CEQA.** Traditional Cultural Properties are important due to their association with cultural practices or spiritual beliefs of a living community, including but not limited to Native American communities. A Rural Historic Landscape is a defined geographic area that historically has been used by people, or shaped or modified by human activity, and that possesses thematic linkage in areas such as land use, vegetation, buildings and structures, roads and waterways, and natural features.

Regulatory Setting

The treatment of cultural resources within the Plan Area is subject to a number of laws, regulations, guidelines and policies designed to protect significant cultural resources including Coastal Act Section 30244 which states: “Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.” Additional California statutes intended to protect significant cultural resources include: Codes Governing Human Remains, Santa Barbara County Code, and the County’s Comprehensive Plan. At a broad level, these all require resource inventory, resource evaluation, and avoidance or, if avoidance is not feasible, mitigation of impacts to significant cultural resources along with consultation with Native Americans where appropriate.

Local Regulation and Policies

At the local level, the County of Santa Barbara requires protection of archaeological and historical resources to the greatest extent feasible. The County Coastal Zoning Ordinances have the following standards for the Coastal Zone and the Inland Area:

- A. *Coastal Zone and Inland area requirements.*
 1. *Development proposed on a lot where archaeological or other cultural sites are located shall be designed to avoid impacts to the cultural sites if possible.*
 2. *When sufficient planning flexibility does not permit avoiding construction on an archaeological or other cultural site, adequate mitigation shall be required. Mitigation shall be designed in compliance with the guidelines of the State Office of Historic Preservation and the State of California Native American Heritage Commission.*
 3. *Native Americans shall be consulted when development proposals are submitted that impact significant archaeological or cultural sites.*

- B. *Inland area requirements. All available measures, including purchase of the site, tax relief, purchase of development rights, etc., shall be explored to avoid development on significant historic, prehistoric, archaeological and other classes of cultural sites.*

development sites and to ensure the protection of these non-renewable resources.

Policies and Implementation

a. Cultural Resources Stewardship Policies

Policy CS-1: Cultural Resources Preservation & Protection. Preserve and protect significant cultural, archaeological and historical resources to the maximum extent feasible.

Policy CS-2: Properties of Concern. Significant cultural resources including historic buildings, structures, Rural Historic Landscapes, archaeological sites, Traditional Cultural Properties (TCP), and Tribal Cultural Resources, and other traditional tribal cultural places and other places of concern to the Native Americans shall be protected and preserved to the maximum extent feasible.

Policy CS-3: Cultural Resources Education. The County shall encourage and support measures to educate residents and visitors about the Gaviota Coast's cultural resources.

b. Cultural Resources Stewardship Implementing Actions

Action CS-1: Landmarking Buildings, Structures & Places. The County and the community should continue to work with willing landowners to identify buildings, structures, and places, including Rural Historic Landscapes, Traditional Cultural Properties, and Tribal Cultural Resources, and other traditional tribal cultural places that qualify for nomination to Historic listing as a County Landmark or Place of Historical Merit Status and forward these requests, nominations to the County Historical Landmarks Advisory Commission (HLAC).

Action CS-2: New Development and Rehabilitation Projects. Development resulting in increased building size or demolition of buildings/structures included in the a list of historic resources, or buildings and structures over 50 years of age and evaluated as important/significant at the local, state, or national level, shall be reviewed by Planning & Development for consistency with historic resource preservation policies.

Action CS-32: Community Cultural Center. The County and Gaviota Coast residents shall investigate, consider and pursue options to develop a community cultural center and/or other community cultural research and education opportunities including Native American culture.

Action CS-43: Government To Government Native American Consultation. The County shall continue its government-to-government consultations with the tribes identified by the Native American Heritage Commission (NAHC) pursuant to Assembly Bill 52 and Senate Bill 18 to ensure that traditional cultural resources of concern to Chumash Native Americans are identified and taken into account in future development planning.

Action CS-54: Confidential Site Locations. The County shall maintain as confidential information about the location of prehistoric cultural resources, including Traditional Cultural Properties, and Tribal Cultural Resources, and other traditional tribal cultural places, historical, and spiritual areas as confidential.

Action CS-65: Tribal Access. The County, Chumash Native American representatives and willing landowners should work together to ensure appropriate tribal access to Traditional Cultural Properties

(TCP), and Tribal Cultural Resources, and other traditional tribal cultural places historical, and spiritual properties while still respecting the rights and privileges of property owners.

c. Cultural Resources Stewardship Development Standards

Dev Std CS-1: Phase 1 Archaeological Surveys. A Phase 1 archaeological survey shall be performed when identified as necessary by a County archaeologist or contract archaeologist. The survey shall include all areas of the project that would result in ground disturbance. The content, format, and length of the Phase 1 survey report shall be consistent with the nature and size of the project and findings of the survey.

Dev Std CS-2: Phase 2 and 3 Archaeological Studies. If archaeological remains are identified and cannot be avoided through project redesign, the proponent shall fund a Phase 2 study to determine the significance of the resource prior to issuance of any permit for development. All feasible mitigation recommendations resulting from the Phase 1 or Phase 2 work, including completion of additional archaeological analysis (Phase 3) and/or project redesign shall be incorporated into any permit issued for development.

Dev Std CS-3: Identification of Traditional Cultural, Historical, and Spiritual Sites. Native Americans shall be consulted when development proposals are submitted that impact significant archaeological or cultural sites. Cultural sites may include Traditional Cultural Properties (TCP), and Tribal Cultural Resources, and other traditional tribal cultural places and cultural landscapes as identified through consultation with ~~by~~ Native Americans.

Dev Std CS-4: Native American Contact List. When existing documentation or a Phase 1 survey indicates that significant prehistoric cultural resources may be affected by a proposed project, the County shall obtain a Native American Contact List from the NAHC and consult with ~~the Chumash~~ Native Americans in accordance with Assembly Bill 52 during each stage of cultural resources review.

Dev Std CS-5: Integrity of Historic Resources. No permits shall be issued for any development or activity that would adversely affect the integrity of officially designated Historic County Landmarks and Places of Historical Merit or those eligible for such designation, historical resources eligible for the California Register of Historical Resources, or identified historical resources ~~districts~~ unless a professional evaluation of the proposed ~~at~~ project has been performed by a qualified Architectural Historian pursuant to the County's most current Regulations Governing Archaeological and Historical Projects. All such professional studies shall be reviewed and approved by the HLAC and Planning and Development and all feasible mitigation measures shall be incorporated into any permit issued for development.

Dev Std CS-6: Historical Resources Studies. A Phase 1, and if required Phase 2, historical resources investigation and report shall be performed completed when identified as necessary by the Director of Planning and Development. The investigation shall include areas of the project that could result in direct or indirect impacts to historic-age buildings, structures, rural historic landscapes, or districts or that could change the integrity of the setting and context for such resources on adjacent parcels. The content, format, and length of the Phase 1, and if required Phase 2, historic report shall be consistent with the nature and size of the project and findings of the investigation. The investigation shall be performed by a qualified Architectural Historian pursuant to the County's most current regulations governing archaeological and historical projects. All such professional studies shall be reviewed by the HLAC and approved by the ~~HLAC and~~ HLAC and Planning and Development. All feasible recommendations resulting



from the Phase 1, and if required Phase 2, shall be incorporated into any permit approved for development.

Policy AG-5: Encouraging Pollinators. The County shall encourage projects on agricultural lands that encourage pollinators, including hedgerows, intercropping, and other forms of habitat buffers.

b. Agricultural Implementing Actions

Action AG-1: Agricultural Permit Streamlining Ordinance Amendments. Incorporate the County's Agricultural Permit Streamlining Ordinance Amendments (Ordinance No. 4750) into the Gaviota Coast Plan Area with appropriate changes to recognize the unique aspects of the Gaviota Coast.

Action AG-2: Cachuma Resources Conservation District (RCD) Partners in Restoration Permit Coordination Program. Incorporate the RCD Partners in Restoration Permit Coordination Program in the Gaviota Coast Plan Area with appropriate changes recommended by the GavPAC that reflect the unique aspects of the Gaviota Coast. The program shall be adopted concurrently with approval of the Gaviota Coast Plan.

~~**Action AG-3: Develop Steep Slopes Development Standards.** The County shall develop a set of ordinance amendments setting enhanced standards for agricultural development on slopes of 30 to 40% or greater on agriculturally zoned land. The standards may include preparation of an erosion control plan with site specific field verifiable best management practices to ensure slope stabilization, soil conservation, and water quality control, identify preferred land clearing methods, and create provisions for reclamation when the operation has been abandoned. The County shall work with the Cachuma RCD and consider the RCD's existing guidance for steep slope development or as amended. This should be accomplished within three years of adoption of the Plan. *Propose to delete as action accomplished with adoption of the plan.*~~

Action AG-4: Agricultural Processing. Develop permit and zoning requirements to allow for regional agricultural processing uses appropriate for the Gaviota Coast Plan Area. The zoning ordinance amendments should establish a framework for allowed uses, criteria for siting development and intensity of use, and limitations on the scale of development appropriate for the Gaviota Coast Plan Area.

Action AG-5: Agricultural Permit Tier Ordinance Amendments. Incorporate the Gaviota Agricultural Tiered Permit Structure Ordinance Amendments into the LUDC and Article II.

Action AG-6: Agricultural Tourism. The County shall develop necessary policies to enable and promote agricultural tourism where such activities will promote and support the primary use of the land as agriculture and minimize conflicts with on-site or adjacent agricultural production or significantly adverse impacts to the environment.

c. Agricultural Development Standards

Dev Std AG-1: Protection of Agricultural Resources. On land zoned for agriculture, non-agricultural development should be directed to those areas least suitable for agriculture. Non-agricultural structural development and associated hardscape shall be minimized on prime soils to the maximum extent feasible. Minimizing the covering of prime soils shall be accomplished through site selection, site and building design, and the use of pervious surfaces wherever feasible.

Dev Std AG-2: Notice to Property Owner. Consistent with the County's adopted Right to Farm Ordinance, a Notice to Property Owner (NTPO) shall be recorded with the final tract and/or parcel map for properties adjacent to agriculturally zoned land. The NTPO shall inform the buyer that: the

transferred property and/or adjacent or nearby property is zoned for agriculture and is located in an area that has been planned for agricultural uses, and that any inconvenience or discomfort from properly conducted agricultural operations shall be allowed consistent with the intent of the Right to Farm Ordinance.

Dev Std AG-3: Steep Slope Standards. Agricultural activities—cultivation, such as the installation of new areas of cultivated agriculture, orchards or vineyards, located on slopes 30% or greater on agriculturally zoned lands shall adhere to the best management practices in the Steep Slope Guidelines, Gaviota Coast Plan Appendix D, to ensure slope stabilization, soil conservation, and water quality control.

alignment narrative. ~~The existing adopted Parks, Recreation, and Trails map PRT 1 is reproduced as Appendix A for reference.~~

Trail Alignment Narratives

The following trail alignment narratives provide additional supporting information regarding proposed trail alignments and locations, alignment preferences and intent (where specified), opportunities and constraints, as well as resource, land use and ownership considerations to be addressed in conjunction with future trail planning efforts.

PRT Map – East Panel (See Figure 4-2)

1. One additional inland trail route shall be created between El Capitan State Park (north of Highway 101) and the eastern planning area boundary, to achieve one additional vertical trail from Highway 101 to West Camino Cielo. For this future trail alignment, the proposed trail alignment on Dos Pueblos Ranch or the proposed Farren Road trail (Goleta Community Plan PRT-3 map) shall be reviewed and one selected as the most suitable and achievable route.
2. The *proposed trail alignment* for the West Camino Cielo crest trail west of Refugio Road generally follows existing boundaries between APNs 081-040-037,-046,-042,-003 and adjacent southern properties, primarily following the existing private road and previously disturbed areas.
3. Planning and implementation of the proposed West Camino Cielo crest trail west of Refugio Road should consider the potential for alternative trails, including existing trail easements as an alternative alignment.

PRT Map – Central Panel (See Figure 4-3)

No specific trail alignment narrative.

PRT Map – West Panel (See Figure 4-4)

Gaviota State Park to Hollister Ranch western boundary

1. The *proposed trail alignment* from Gaviota State Park to the Hollister Ranch western boundary indicates a continuation of the coastal trail.
2. Encourage continued dialogue with willing landowners to explore managed public access and recreation options.

Hollister Ranch western boundary to Gaviota Coast Plan western boundary

1. The *proposed trail alignment* from the Hollister Ranch western boundary to the Gaviota Coast Plan western boundary indicates a continuation of the coastal trail.
2. Recognizing the unique value of the area, the County shall work with willing landowners and other agencies to explore options for future trails.

Segment 1: Eagle Canyon to Dos Pueblos Ranch (See Figure 4-5)

Planning for trails within PRT map Segment 1 shall take into consideration the following principles:

1. Provide coastal trail continuity south of the railroad with the Goleta Community Plan PRT-3 map proposed trail alignment.
2. Paradiso del Mare: The proposed coastal trail extends east to west and south of the railroad.
3. Makar (Naples township parcels): The alignment for the proposed coastal trail primary route (across the Makar property) should be on the bluff tops south of the Union Pacific Railroad as close to the ocean as possible. The proposed coastal trail should be located south of the highway as close to the shoreline as feasible. Alternate alignments may be considered depending on environmental and topographic constraints, building envelope location and railroad crossing location on Paradiso del Mare.
4. Construct a trailhead parking lot with restrooms south of the highway on Santa Barbara Ranch.
5. Construct a trailhead parking lot north of the highway on Santa Barbara Ranch in close proximity to the Dos Pueblos Ranch northbound highway exit.
6. Explore opportunity for one additional vertical beach access between Tomate Canyon and Dos Pueblos Creek. Tomate Canyon West or the existing canyon on the Santa Barbara Ranch are preferred locations for a coastal access trail. Vertical beach access shall avoid potential impacts to the Naples seal haul out area and Naples Reef.
7. Santa Barbara Ranch: The alignment for the proposed coastal trail primary route (across Santa Barbara Ranch) should be on the bluff tops south of the Union Pacific Railroad as close to the ocean as possible.
8. Dos Pueblos Ranch (south of Highway 101): For properties south of Highway 101, collectively known as Dos Pueblos Ranch, encourage the development of tools and incentives (e.g. clustering development, internal transfer of development rights, development agreements, specific plans, etc) to balance potential development rights with important coastal land use issues. Potential public objectives include:
 - Maintain, preserve, and enhance agricultural production
 - Provide opportunities for coastal trail and beach access south of the railroad where feasible
 - Provide public and/or private low intensity recreational opportunities
 - Protect important coastal visual, biological, archaeological, and historic resources
 - Protect bluff top open space

Segment 2: Las Varas Ranch to El Capitan (See Figure 4-6)

Planning for trails within PRT map Segment 2 shall take into consideration the following principles:

1. Construct a trailhead parking lot south of the highway on Las Varas Ranch.
2. Work with the landowner and Caltrans to facilitate potential future public trail access and/or improvements to the existing tunnel under Highway 101 near Gato Canyon, and potential future public trail access and parking at the Southbound Highway 101 / El Capitan Ranch Road interchange. Public trail access shall not conflict with agricultural operations.
3. Las Varas Ranch: The alignment for the proposed coastal trail primary route (across Las Varas Ranch) should be on the bluff tops as close to the ocean as possible.



4. Las Varas Ranch (south of Highway 101): For properties south of Highway 101, collectively known as Las Varas Ranch, encourage the development of tools and incentives (e.g. clustering development, internal transfer of development rights, development agreements, specific plans, etc.) to balance potential development rights with important coastal land use issues. Potential public objectives include:

- Maintain, preserve, and enhance agricultural production
- Provide opportunities for coastal trail and beach access south of the railroad where feasible
- Provide public and/or private low intensity recreational opportunities
- Protect important coastal visual, biological, archaeological, and historic resources
- Protect bluff top open space

Segment 3: El Capitan State Beach to Tajiguas (See Figure 4-7)

Planning for trails within PRT map Segment 3 shall take into consideration the following principles:

- Segment 3a:
1. The County shall work with El Capitan Canyon Campground, Caltrans, and State Parks to address safety concerns regarding cyclist and pedestrian use of the El Capitan State Beach undercrossing.
 2. The County shall work with State Parks to prioritize development of a feasible, long-term solution to repair and then maintain the damaged Refugio State Beach to El Capitan State Beach bike path.
 3. The County shall work with El Capitan Canyon Campground and State Parks to improve/formalize a trailhead with parking lot for the Bill Wallace Trail and the potential realignment and expansion of the Bill Wallace Trail System.
 4. The County shall work with Caltrans and State Parks to establish viable parking options, including potential trailhead parking area, for recreational uses in the vicinity of the Refugio State Beach interchange. Options should address safety concerns and consider installing directional signage for trailhead.
 5. The County shall work with Caltrans, Union Pacific Railroad, and State Parks to consider the long-term potential for realignment of the railroad to allow for more public access while ensuring viability of the railroad bed in the future.
- Segment 3b:
1. Apply the *Coastal Trail Alignment* general principles.
 2. The *coastal trail alignment* from Refugio State Beach to Tajiguas indicates a continuation of the coastal trail with a preferred alignment between Highway 101 and the railroad. The *Alternate Alignment* south of the railroad should be a foot path only.
 3. Explore alternate alignment north of Highway 101 from Refugio Road West to Mariposa Reina interchange.
 4. Explore vertical access opportunities where feasible.
 5. Work with State Parks and private landowners to explore opportunities for acquisition of private landholdings south of Highway 101, between Refugio State Beach and Tajiguas Creek, for potential future public access.

Segment 4: Tajiguas to San Onofre (See Figure 4-8)

Planning for trails within PRT map Segment 4 shall take into consideration the following principles:

- Segment 4a:
1. Apply the *Coastal Trail Alignment* general principles.
 2. The *coastal trail alignment* from Tajiguas to Arroyo Hondo indicates a continuation of the coastal trail between the railroad and Highway 101, recognizing the need for coordination between regional agencies as required.
 3. Construct trailhead parking near the frontage road west of Tajiguas Creek.



4. Explore alternate alignment north of Highway 101 from Refugio Road West to Mariposa Reina interchange.

5. The County recognizes the importance of that portion of Arroyo Quemada Lane located within public right-of-way (a frontage road) for public parking and a potential off highway location for the coastal trail alignment.

6. The County recognizes the importance of the Caltrans vista point at Arroyo Hondo for potential coastal access and parking, with improvements to formalize any existing informal access below the Union Pacific Railroad trestle.

- Segment 4b:
1. Apply the *Coastal Trail Alignment* general principles.
 2. The *coastal trail alignment* from Arroyo Hondo to San Onofre indicates a continuation of the coastal trail between Highway 101 and the railroad.
 3. Explore alternate alignment north of Highway 101 from Refugio Road West to Mariposa Reina interchange.

Segment 5: San Onofre to Gaviota State Park (See Figure 4-9)

The proposed trails on PRT map Segment 5 support a vision of providing an enhanced network of trails from “Sea to Cielo” by linking the existing recreation, coastal access and trail amenities within Gaviota State Park with the proposed coastal trail and inland trail opportunities extending into the Los Padres National Forest (LPNF). The proposed trail alignments are primarily located on public lands and seek to utilize the existing infrastructure at the Mariposa Reina interchange with Highway 101 for enhanced trailhead access and to facilitate north/south trail connectivity.

North of the Gaviota Tunnel, two existing trailhead parking areas (east and west of Highway 101) are located within Gaviota State Park near Las Cruces. The eastern trailhead provides access to a network of loop trails within the state park, and access to the Trespass Trail and the popular Gaviota Peak Trail which extends into the LPNF and West Camino Cielo Crest Trail. Opportunities for additional trail connectivity include providing a loop trail between Squat Camp and Trespass Trail.

The Brinkman Property is bordered by Gaviota State Park to the west, the LPNF to the north, and Arroyo Hondo Preserve to the east. Due to its proximity to public lands and diversity of unspoiled natural resources, there may be interest in the future to work with the private landowners to explore land conservation opportunities and/or potential public acquisition.

Future land conservation efforts involving the Brinkman Property shall explore opportunities for enhanced public trail access through the westernmost portion of the property. The PRT map (Segment 5) identifies a potential *Primary Route* which could provide trail connectivity between the proposed trail alignment near Mariposa Reina/Gaviota Village and other proposed inland trails to the north within the LPNF. Additional trails in this area shall be supported and subject to trail feasibility studies and assessment of trail carrying capacity and potential resource and land use impacts.

Planning for trails within PRT map Segment 5 shall take into consideration the trail narrative above and the following principles:

1. Apply the *Coastal Trail Alignment* general principles.



2. Re-use plans for the Gaviota Marine Terminal property, the PXP property, and adjoining State Parks lands should be planned cohesively with respect to recreation, trails, and coastal access.
3. Explore vertical access opportunities to the beach where feasible.
4. Use of the Mariposa Reina overpass is an important component of the proposed trail network. The County shall coordinate with Caltrans and State Parks to address cyclist and pedestrian use of the Mariposa Reina overcrossing to access potential trails north and south of the interchange. Trailhead parking should be provided in close proximity to the Mariposa Reina interchange.
5. Explore alternate alignment north of Highway 101 from Refugio Road West to Mariposa Reina interchange.
6. The alignment for the proposed coastal trail primary route from San Onofre Canyon to the Gaviota State Park campground should be on the bluff tops as close to the ocean as possible.

e. Trails and Coastal Access Goals and Policies

Goal REC-1: Protect existing public access and actively promote expansion of recreation, open space, coastal access, lower cost recreational overnight accommodations, and trails within the Gaviota Coast.

Policy REC-1: Gaviota Coast Plan Area Trails and Open Space. Substantially increase opportunities for provision of public trails and open space within the Gaviota Coast Plan Area, including completion of the California Coastal Trail, provision of well-planned coastal vertical access points and foothill trails located on both public and private lands.

Policy REC-2: Promote Expansion of Trails, Coastal Access and Recreational Opportunities. The County shall actively promote expansion of public trails, coastal access and recreational opportunities within the Gaviota Coast Plan Area, using its regulatory authority, incentives and other tools to acquire and develop trails, coastal access and recreational facilities, and to encourage provision of lower cost recreational overnight accommodations. For all pending private and public development projects with planned or existing recreational uses, the County shall fully explore options for new trails, coastal access and parking, lower cost overnight accommodations, and ways to promote their acquisition and development through the environmental and planning review processes.

Policy REC-3: Trail Opportunity Preferences. Opportunities to establish and enhance public trails, access, and recreational opportunities shall be pursued as they arise on: 1) public lands, 2) private lands of willing landowners, and 3) lands exacted as a result of the discretionary development process or eminent domain, subject to state and federal law.

Policy REC-4: Protect and Preserve Trail Alignments. All opportunities for public trails within the general alignments and locations identified on the Parks, Recreation and Trails (PRT) map shall be protected, preserved, provided for, and sited and designed using the considerations in Policy REC-5 and Policy REC-6 during review and approval of development and/or permits requiring discretionary approval.

Policy REC-5: Siting and Design Considerations. Trail siting, design and/or maintenance should be low impact and foster sustainability. Planning for the location and intensity of use of public trails, access, and recreational opportunities within the Gaviota Coast Plan Area shall be conducted in accordance with the following:

1. Trail alignments as indicated on the PRT map(s) represent suggested alignments that provide connectivity to the planned trails system. These suggested alignments should not be construed as final trail alignments for construction due to the coarse scale of the mapping, and the lack of detailed, site-specific information. Precise trail alignments require detailed site review, balancing of public access requirements with protection and preservation of sensitive resources, the rights and privacy of private property owners, and agricultural viability, and analysis and approval in accordance with the principles and policies of this Plan.
2. All trails shall address sensitive agricultural, cultural and natural resources including wildlife corridors and both public projects and trails and physical aspects of trails, carrying capacity study of the impacts of public uses with regard to supporting infrastructure, and impacts anticipated from climate change, including sea level rise and bluff erosion.
3. Planning for the location and intensity of use of public trails shall consider siting and design features to keep hikers, bicyclists and equestrians on the designated cleared pathways and to minimize impacts to sensitive habitat areas and environmental resources.

4. Planning for trails within the Gaviota Coast Plan Area shall consider trail user safety by discouraging at grade crossings of the railroad, and utilizing existing Highway 101 interchange crossings to provide north/south trail connectivity.
5. Planning for trails within the Gaviota Coast Plan Area shall consider the potential impacts of trail development from the landowner perspective, and seek to avoid or minimize conflicts with surrounding land uses.
6. Proposed trail alignments shall seek to avoid areas that are highly geologically unstable or especially prone to erosion. Trails along the coastal bluff should be established as easements with adequate width to provide for landward movement of permanent trail access in response to bluff retreat.
7. When new trails or segments are established, determine for each new trail or segment the appropriate uses to allow under the County’s multiple use policy. The appropriate use determination will depend on the trail setting, whether the trail is a primary trail or provides a loop or connection to other trails in the system, the terrain over ~~that~~ which the trail crosses, and the potential effect of the trail upon agriculture and sensitive resources. Trail design shall reflect the uses determined to be appropriate for the particular trail or segment.
8. Community and non-profit organization involvement in the maintenance and interpretation of public trails and access areas should be actively encouraged.
9. Trail maintenance crews shall consult with Santa Barbara County Fire Department and/or Los Padres National Forest Service ~~shall be notified~~ prior to beginning any trail maintenance within the Plan Area so that ~~agencies may determine~~ the appropriate timing, methods and tools to be used may be determined.

Policy REC-6: Coastal Trail Siting and Design Considerations. Siting, design and maintenance of the coastal trail and associated public access facilities should emphasize low impact designs and foster sustainability. In addition to the standards set forth in Policy Rec-3, the following shall be followed with respect to the specific siting and design of the trails within the Coastal Zone:

1. The coastal trail shall be as close to or on the beach as feasible consistent with all other planning and resource constraints. Vertical connector trails shall provide reasonably spaced and periodic connections between the bike trail and the beach/bluff trail.
2. Trails shall be located to minimize the impacts on fragile coastal resources, agricultural operations, and historic and cultural resources, and should account for any sea level rise and/or associated bluff retreat.
3. The carrying capacity of the land traversed by the coast trail should be considered in order to protect existing resources as required by the Coastal Act.
4. Vertical beach access should utilize natural topography as much as possible to avoid engineered structures. However, where necessary and appropriate, engineered solutions should be sensitive to the viewshed and existing resources, and should minimize the need for maintenance.
5. Establishment and enhancement of coastal access and trails shall recognize the multiple uses served, use intensity, and level of infrastructure along the coastline. Consider locating high intensity trail activities, such as cycling, in close proximity to the highway. Lateral and vertical hiking trails are low intensity uses that can generally be accommodated near the coastal bluff or on the beach, where appropriate.
6. Trailhead parking facilities should be located as close as possible to Highway 101, and sanitation and trash facilities should be considered at major trailheads.

Action REC-2: Managed Access. The County shall explore managed access as a potential concept to address public trail carrying capacity or resources concerns.

Action REC-3: Coastal Trail Planning Coordination. The County shall actively seek funding to identify issues and constraints related to coastal trail development, planning, and construction in addition to identifying preferred methods to achieve inter-jurisdictional coordination, planning, and implementation.

1. Seek funding for coastal trail development, planning, and construction and identify related issues and constraints
2. Promote and achieve inter-jurisdictional coordination, planning, and implementation
3. Work with private non-profit trail organizations to acquire funding

Action REC-4: Trail Siting Guidelines. The County shall develop trail siting guidelines to assist in the siting, design, construction and implementation of proposed trail alignments. The guidelines will address general siting characteristics; biological, agricultural, visual, and historic/cultural resources; access control; trail construction and maintenance, as well as specific State and local guidelines as appropriate. The trail siting guidelines shall be adopted concurrently with the Gaviota Coast Plan.

Action REC-5: Memorandum of Understanding. The County should establish a Memorandum of Understanding (MOU) with the California Department of Parks and Recreation, Caltrans, and the US Forest Service to coordinate planning and funding of future trail implementation, managed access, environmental review, construction, and long-term maintenance.

Action REC-6: Trails Funding. The county shall work with the County Riding and Hiking Trails Advisory Committee, Santa Barbara County Trails Council, and other organizations to identify and secure a dedicated funding source for the establishment and maintenance of trails within the Plan Area.

Action REC-7: Trail and Access Completion. The County shall work with the County Riding and Hiking Trails Advisory Committee to strive to complete public access improvements including, but not limited to, the following:

1. Acquire near shore bluff top easements for the California Coastal Trail from the Bacara Hotel to El Capitan State Beach, and develop and open the California Coastal Trail throughout this reach.
2. Work with California State Parks and the California Coastal Commission to reopen the closed segment of the existing Class I bikeway that links El Capitan and Refugio State Beaches.
3. Acquire and develop at least two coastal access points along the east end of the Plan Area at Dos Pueblos Ranch, Edwards Point, Santa Barbara Ranch, Makar/Tomate Canyon West, or Paradiso del Mare.
4. Work with California State Parks to develop and open a three-mile-long bluff top segment of the California Coastal Trail, south of U. S. Highway 101, from Gaviota State Park east to the Gaviota Marine Terminal.
5. Develop at least one major coastal access point and associated public improvements along the west end of the coast at Arroyo Hondo or Gaviota Marine Terminal.

g. Infrastructure Implementing Actions

Action TEI-8: Nonpotable Water Reuse Systems. The County should consider adopting the State updates to Title 24, Part 5, Chapter 16A, Part I – Nonpotable Water Reuse Systems.

Action TEI-9: Water Conservation. The County should consider alternative waste disposal and water conservation systems.

Action TEI-10: Agricultural Water Well Testing. Amend County Coastal Zoning Ordinance to create an exemption for agricultural water well testing.

Action TEI-11: Septic System Upgrades. The County should encourage individuals with older or failing septic systems to modernize or upgrade through fee reductions or other incentives and consider hardship provisions.

h. Infrastructure Development Standards

Dev Std TEI-2: ~~Septic Onsite Wastewater Treatment Systems.~~ Onsite wastewater treatment systems (OWTS) shall comply with the Santa Barbara County Local Agency Management Program (LAMP), Chapter 18C of the County Code and where applicable, Regional Water Quality Control Board standards. Adherence to ~~these standards and Regional Water Quality Control Board and other applicable state standards,~~ applicable zoning regulations ~~and the County Wastewater Ordinances~~ shall constitute a finding of consistency with Land Use Development Policy 4 and Coastal Land Use Policy 2-6.

~~Dev Std TEI-3: Private Sewage Disposal.~~ To the maximum extent feasible, development requiring private sewage disposal shall utilize gravity flow of wastewater to the septic tank and disposal field to minimize mechanical failure, which may cause surfacing of effluent. For lots of record where gravity flow of effluent is unavailable, pumping may be allowed. For new subdivisions where gravity flow to the public sewer is unavailable, the lift station shall be owned and/or maintained by a public agency such as a community services district. Private operation and maintenance of a shared or community lift station shall be prohibited. This standard applies unless supplanted by Environmental Health Services Standards.

~~Dev Std TEI-4: Effluent Daylighting.~~ To reduce the possibility of prolonged effluent daylighting, two disposal fields shall be built to serve each septic system as required by Environmental Health Services so that when one field begins to fail, the other field can immediately be put into use. An additional third expansion area shall be set aside where no development can occur, except for driveways on constrained sites as provided in Dev Std TEI-6 Groundwater Effluence. In the expansion area, a disposal field should be constructed when any other disposal field is in a state of failure. This standard applies unless supplanted by Environmental Health Services Standards.

~~Dev Std TEI-5: Existing Septic Systems.~~ For remodels of plumbed structures where the existing septic system must be enlarged, or where septic system repairs are required due to failure, in addition to the enlargement and/or repair of the existing septic system, an additional disposal field shall be installed to the maximum extent feasible. This standard applies unless supplanted by Environmental Health Services Standards.

Dev Std TEI-6: Groundwater Effluence. Measures to decrease the amount of nitrates filtering through soil to groundwater shall be required, such as the following:

1. Shallow-rooted non-invasive plants (maximum root depth of four feet) shall be planted above all leach fields to encourage evapotranspiration of effluent and uptake of nitrates. Impervious surfaces, such as paved driveways, shall not be constructed above leach fields. If site constraints require a driveway to be located above a leach field in order to ensure reasonable use of the property, turf block or other suitable pervious surface shall be used.
- ~~2. For properties of 5 acres or less and in areas with insufficient separation to groundwater, advanced treatment for the removal of nitrates shall be required on septic systems utilizing drywells as the disposal field. Existing septic systems that utilize drywells that have failed, or that need to be modified, must also install advanced treatment.~~

Dev Std TEI-7: ~~Septic Onsite Wastewater Treatment~~ System Locations. ~~Septic Onsite wastewater treatment~~ systems and other potential sources of water pollution shall be a minimum of 100 feet from the edge of either side of top-of-bank or existing edge of riparian vegetation, whichever is further. Modifications to existing and new sources of potential water pollution shall meet this buffer to the maximum extent feasible. This standard applies unless supplanted by Environmental Health Services Standards.

Dev Std TEI-8: New ~~Septic Onsite Wastewater Treatment~~ Systems. Development shall not be approved where individual or documented cumulative impacts of ~~septic onsite wastewater treatment~~ systems for new development would cause pollution of creeks.

ATTACHMENT B

Findings for Approval and Statement of Overriding Considerations Gaviota Coast Plan

Case Nos. 13GPA-00000-00006, 13GPA-00000-00007, 13ORD-00000-00006,
13ORD-00000-00007, 13RZN-00000-00002, 13RZN-00000-00003 and 15EIR-00000-00003

1.0 CEQA FINDINGS

1.1 FINDINGS PURSUANT TO PUBLIC RESOURCES CODE SECTION 21081 AND THE CALIFORNIA ENVIRONMENTAL QUALITY ACT GUIDELINES SECTIONS 15090 AND 15091:

1.1.1 CONSIDERATION OF THE ENVIRONMENTAL IMPACT REPORT

The Final Environmental Impact Report (Final EIR) (15EIR-00000-00003) was presented to the Planning Commission and all voting members of the Planning Commission have reviewed and considered the information contained in the Final EIR and its appendices prior to approving the project. In addition, all voting members of the Planning Commission have reviewed and considered testimony and additional information presented at, or prior to, its public hearings. The Final EIR reflects the independent judgment and analysis of the Planning Commission and, with a Revision Letter to be drafted by staff, is adequate for this project.

1.1.2 FULL DISCLOSURE

The Planning Commission finds and certifies that the Final EIR (15EIR-00000-00003) and its appendices, along with a Revision Letter to be drafted by staff, constitute a complete, accurate, adequate, and good faith effort at full disclosure under CEQA. The Planning Commission further finds and certifies that the Final EIR has been completed in compliance with CEQA.

1.1.3 LOCATION OF RECORD OF PROCEEDINGS

The documents and other materials which constitute the record of proceedings upon which this decision is based are in the custody of the Secretary of the Planning Commission of the Planning and Development Department located at 123 East Anapamu Street, Santa Barbara, CA 93101.

1.1.4 FINDINGS THAT CERTAIN UNAVOIDABLE IMPACTS ARE MITIGATED TO THE MAXIMUM EXTENT FEASIBLE

The Final EIR (15EIR-00000-00003) and its appendices for the Gaviota Coast Plan identify thirteen environmental impacts under three impact areas which cannot be fully mitigated and are therefore considered unavoidable (Class I). Those impact areas are: Biological Resources; Cultural and Historical Resources; and Parks, Recreation, and Trails. To the extent the impacts remain significant and unavoidable, such impacts are acceptable when

weighed against the overriding social, economic, legal, technical, and other considerations set forth in the Statement of Overriding Considerations included herein. For each of these Class I impacts identified by the Final EIR, feasible changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects to the maximum extent feasible, as discussed below.

Biological Resources

Impacts: The Final EIR identified significant project specific and cumulative impacts related to sensitive vegetation communities (Impact BIO-1), sensitive plant species (Impact BIO-2), sensitive wildlife species (Impact BIO-3), and jurisdictional wetlands and waters (Impact BIO-4). The Final EIR also identified a cumulative impact to wildlife movement corridors.

Mitigation: In addition to policies, actions, and development standards included in the Gaviota Coast Plan that reduce impacts to Biological Resources, the Final EIR identifies four mitigation measures (MM BIO-1, MM BIO-2, MM BIO-3, and MM BIO-4), which revise one policy and one development standard and add three new development standards to the Plan.

Impacts to sensitive vegetation communities (Impact BIO-1) are further reduced in the Coastal Zone by MM BIO-1, which requires revisions to Gaviota Coast Plan Policy LU-2. The revised policy requires that the policy or provision of the Gaviota Coast Plan or the Local Coastal Program that is most protective of coastal resources take precedence. MM BIO-1.1 revises development standard Dev Std NS-2 by splitting it into two standards, one applicable to the Inland Area, one applicable to the Coastal Zone. The Coastal Zone version adds buffers from wetlands and butterfly trees consistent with Coastal Land Use Plan (CLUP) policies and does not allow downward adjustment of these buffers. In addition, a recommended mitigation measures, MM SERV-1, also mitigates impacts to sensitive vegetation communities because it requires siting of new development in locations that minimize the need for fuel management and clearance of native vegetation. These mitigation measures were incorporated into the Gaviota Coast Plan. No other feasible mitigation measures are known that will further reduce impacts. Under a reasonable 20-year buildout scenario of the Gaviota Coast Plan, impacts to sensitive vegetation communities will not be fully mitigated and will remain significant and unavoidable.

Impacts to sensitive plant species (Impact BIO-2) are reduced as follows: (1) MM BIO-1 requires policy and development standard revisions and additions to the Gaviota Coast Plan as discussed above; and (2) MM BIO-2 requires a new development standard (Dev Std NS-3) that requires focused surveys for sensitive plant species if potentially suitable habitat exists on a project site. This mitigation measure was incorporated into the Gaviota Coast Plan. No other feasible mitigation measures are known which will further reduce impacts. Under a reasonable 20-year buildout scenario of the Gaviota Coast Plan, impacts to sensitive plant species will not be fully mitigated and will remain significant and unavoidable.

Impacts to sensitive wildlife species (Impact BIO-3) are reduced as follows: (1) MM BIO-1 requires policy and development standard revisions and additions to the Gaviota Coast Plan as

discussed above; and (2) MM BIO-3 requires a new development standard (Dev Std NS-4) that requires focused presence/absence surveys for sensitive wildlife species if potentially suitable habitat or critical habitat exists on or adjacent to a project site. This mitigation measure was incorporated into the Gaviota Coast Plan. No other feasible mitigation measures are known which will further reduce impacts. Under a reasonable 20-year buildout scenario of the Gaviota Coast Plan, impacts to sensitive wildlife species will not be fully mitigated and will remain significant and unavoidable.

Impacts to jurisdictional wetlands and waters (Impact BIO-4) are reduced by MM BIO-4, which requires the incorporation of an additional development standard in the Gaviota Coast Plan. The new development standard (Dev Std NS-5) requires a formal wetlands delineation of the project site, a determination of presence/absence and boundaries of any Waters of the U.S. and Waters of the State, and limits of any riparian habitats under the sole jurisdiction of the California Department of Fish and Wildlife, if potentially jurisdictional wetlands or waters are found on or adjacent to a project site. Mitigation shall be based on the type of wetland impacted and should prevent any net loss of wetland functions and values. The new development standard also states that mitigation replacement ratios may be higher depending on the type and quality of the resource impacts. In addition, MM BIO-1.1 revised Dev Std NS-2 such that in the Coastal Zone, a minimum buffer of 100 feet would apply to wetlands. These mitigation measures were incorporated into the Gaviota Coast Plan. No other feasible mitigation measures are known which will further reduce impacts. Under a reasonable 20-year buildout scenario of the Gaviota Coast Plan, impacts to jurisdictional wetlands and waters will not be fully mitigated and will remain significant and unavoidable.

Cumulative impacts to biological resources, including wildlife movement corridors, are mitigated to the maximum extent feasible with measures MM BIO-1 through MM BIO-4. Impacts to biological resources occurring in areas outside the Gaviota Coast Plan Area as a result of cumulative growth and buildout of adjacent cities' general plans and the County's Comprehensive Plan are added to impacts expected in the Gaviota Coast Plan Area. The combined effect of cumulative development is anticipated to result in significant and unavoidable cumulative impacts to biological resources.

Findings: The Planning Commission finds that feasible mitigation measures (MM BIO-1, MM BIO-1.1, MM BIO-2, MM BIO-3 and MM BIO-4) have been incorporated into the Gaviota Coast Plan to reduce the significant environmental effects identified in the Final EIR to the maximum extent feasible. These mitigation measures are implemented during project review to mitigate project specific and cumulative impacts to biological resources to the maximum extent feasible. However, even with mitigation measures, impacts to biological resources will remain significant and unavoidable. Therefore, the Planning Commission finds the Gaviota Coast Plan's residual impacts to biological resources are acceptable due to the overriding considerations discussed in the Statement of Overriding Considerations.

Cultural and Historical Resources

Impacts: The Final EIR identified significant project-specific and cumulative impacts to historic, archaeological, and traditional resources (Impact CR-1).

Mitigation: In addition to policies, actions, and development standards included in the Gaviota Coast Plan that reduce impacts to historic, archaeological, and traditional resources, the Final EIR identifies one mitigation measure (MM CR-1). CR-1 revises one policy, four actions, and three development standards of the Plan, and adds one new action and one new development standard to the Plan. The revisions primarily expand language to ensure that impacts to tribal cultural resources are also addressed appropriately. Other revisions and the new action and development standard add additional measures to protect historical resources from potential impacts of Plan buildout. This mitigation measure was incorporated into the Gaviota Coast Plan. No other feasible mitigation measures are known which will further reduce impacts. Under a reasonable 20-year buildout scenario of the Gaviota Coast Plan, impacts to historic, archaeological, and traditional resources will not be fully mitigated and will remain significant and unavoidable.

Findings: The Planning Commission finds that feasible mitigation measures (MM CR-1) have been incorporated into the Gaviota Coast Plan to reduce the significant environmental effects identified in the Final EIR to the maximum extent feasible. These mitigation measures are implemented during project review to mitigate project specific and cumulative impacts to cultural and historical resources to the maximum extent feasible. However, even with mitigation measures, residual impacts to historic resources, prehistoric and archaeological resources, and tribal cultural resources remain significant and unavoidable. Therefore, the Planning Commission finds the Gaviota Coast Plan's residual impacts to historic, archaeological, and traditional resources are acceptable due to the overriding considerations discussed in the Statement of Overriding Considerations.

Parks, Recreation, and Trails Impacts to Biological, Cultural, and Agricultural Resources

Impacts: The Final EIR identified significant project-specific impacts related to adverse physical environmental effects resulting from the construction of additional recreational facilities, primarily the California Coastal Trail, primary trail routes to connect with existing trails, and associated facilities (e.g., trailhead parking, restrooms, etc.) (Impact PR-1). The adverse effects resulting from this development include five potential impacts to biological resources (BIO-1: sensitive vegetation communities, BIO-2: sensitive plant species, BIO-3: sensitive wildlife species, BIO-4: jurisdictional wetlands and waters, and BIO-5: wildlife movement corridors), one potential impact to cultural and historical resources (CR-1: historical and archaeological resources), and two potential impacts to agricultural resources (AG-1: direct conversion of prime agricultural land to non-agricultural use and AG-2: land use compatibility/agricultural interface (indirect impacts)).

Mitigation: The Gaviota Coast Plan includes a number of programmatic policies and development standards that reduce the environmental effects of constructing new trails and associated facilities, including the application of the *Coastal Trail Alignment General*

Principles, Policies REC-5 and REC-6 (trail siting and design considerations), and the use of trail siting guidelines. MM PR-1 requires adoption and implementation of Gaviota Coast Plan Trail Siting Guidelines that provide further direction to plan, site, and design trails in ways to reduce impacts to agricultural, biological and cultural resources. The Gaviota Coast Plan Trail Siting Guidelines were adopted concurrently with the Gaviota Coast Plan. In addition, Sections 4.1 through 4.12 of the Final EIR identify other mitigation measures to mitigate buildout of the Gaviota Coast Plan (and/or construction of said buildout), which will also mitigate impacts related to the construction of trails and associated facilities, especially MM BIO-1 through MM BIO-4 and MM CR-1. In addition, the Final EIR identifies one measure to further mitigate Impact PR-1 to agricultural resources, biological resources and cultural resources. Combined, these measures will reduce project-specific impacts but not to a level of insignificance due to uncertainty regarding ultimate trail location and because implementation of trails and associated facilities would occur over the life of the Plan. In addition, it is unknown whether avoidance or feasible on-site or off-site mitigation opportunities will be available at the time each trail segment is implemented. No other feasible mitigation measures are known which will further reduce impacts. Therefore, adverse impacts to biological, cultural, and agricultural resources resulting from construction of trails and associated facilities will not be fully mitigated and will remain significant and unavoidable.

Findings: The Planning Commission finds that feasible mitigation measures (MM PR-1) have been incorporated into the Gaviota Coast Plan to reduce the significant environmental effects identified in the Final EIR to the maximum extent feasible. These mitigation measures are implemented during project review to mitigate project specific and cumulative impacts to agricultural, biological and cultural resources, as a result of Impact PR-1, to the maximum extent feasible. However, even with mitigation measures, impacts resulting from construction of trails and associated facilities will remain significant and unavoidable. Therefore, the Planning Commission finds the Gaviota Coast Plan's residual impacts of parks, recreation, and trails are acceptable due to the overriding considerations discussed in the Statement of Overriding Considerations.

1.1.5 FINDINGS THAT CERTAIN IMPACTS ARE MITIGATED TO INSIGNIFICANCE BY MITIGATION MEASURES

The Final EIR (15EIR-00000-00003) identified several subject areas for which the project is considered to cause or contribute to significant, but mitigable environmental impacts (Class II). For each of these Class II impacts identified by the Final EIR, feasible changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect, as discussed below.

Transportation and Circulation

Impacts: The Final EIR identified potentially significant but mitigable project-specific and cumulative impacts due to: (1) limited plan direction for a coordinated approach for comprehensively planning for a transportation corridor plan (Impact TC-1); and (2) the potential for projects that take primary access through at-grade crossings of Highway 1 or

Highway 101 to create potential design feature safety hazards at highway at-grade crossings (Impact TC-2).

Mitigation: In addition to policies, actions, and development standards included in the Gaviota Coast Plan that reduce impacts to Transportation and Circulation, the Final EIR identifies one mitigation measure (MM TC-1) that will further reduce potentially significant impacts to a less than significant level. MM TC-1 requires revision of Action TEI-2 of the Plan to strengthen the action to provide a coordinated and comprehensive approach with Caltrans, Santa Barbara County Association of Governments, California Department of Parks, and Union Pacific Railroad for future corridor planning. The strengthened action will address operational and safety improvements as well as expanded opportunities for alternative (non-vehicular) modes of transportation. The Final EIR identifies one mitigation measure (MM TC-2) that will reduce design feature safety hazards impacts to less than significant levels. The mitigation requires the revision of Plan Policy TEI-7 to require submittal of any projects for which primary ingress or egress would be through an at-grade crossing of Highway 1 or Highway 101 to Caltrans for review and comment regarding safety issues and requirements for at-grade crossings.

Findings: The Planning Commission finds that MM TC-1 and MM TC-2 will reduce the identified significant effects on transportation and circulation to a level of insignificance. The strengthened action will address operational and safety improvements as well as expanded opportunities for alternative (non-vehicular) modes of transportation.

Aesthetics/Visual Resources

Impacts: The Final EIR identified potentially significant but mitigable project-specific and cumulative impacts resulting from buildout of the Gaviota Coast Plan that could: (1) potentially change the visual character of Plan Area (Impact VIS-1); (2) impact public scenic views, routes and gateways (Impact VIS-2); and increase light and glare (Impact VIS-3).

Mitigation: In addition to the existing policies in the Land Use Element and CLUP of the Comprehensive Plan, and the Ridgeline and Hillside Development Guidelines in the Land Use and Development Code (LUDC) and Coastal Zoning Ordinance (CZO), the Gaviota Coast Plan incorporates numerous programmatic policies, actions, and development standards, including a new Critical Viewshed Corridor Overlay, that mitigate potentially significant impacts to aesthetic/visual resources. The Critical Viewshed Corridor Overlay was incorporated into the LUDC, CZO, and zoning overlay maps concurrently with adoption of the Gaviota Coast Plan. In addition, the Final EIR identifies one measure to further mitigate the three identified potentially significant impacts. MM VIS-1 requires adoption and implementation of Gaviota Coast Plan Design Guidelines that will preserve the region's natural, agricultural, and scenic resources. The Gaviota Coast Plan Design Guidelines were adopted concurrently with the Gaviota Coast Plan. Impacts to aesthetics/visual resources will be less than significant with implementation of this mitigation measure and implementation of the Design Guidelines with future development.

Findings: The Planning Commission finds that MM VIS-1 will reduce significant effects on aesthetics/visual resources to a level of insignificance. This mitigation measure is implemented during project review to mitigate project specific and cumulative impacts to aesthetics/visual resources to the maximum extent feasible.

Biological Resources

Impacts: The Final EIR identified a potentially significant but mitigable project-specific impact to adopted conservation plans due to potential conflict with coastal biological resource protection policies of the CLUP of the County's Local Coastal Program (Impact BIO-6).

Mitigation: In addition to policies, actions, and development standards included in the Gaviota Coast Plan that reduce impacts to Biological Resources, the Final EIR identifies one mitigation measure (MM BIO-1) that will further reduce potentially significant impacts to a less than significant level. MM BIO-1 requires a revision to Policy LU-1 stating that the policy or provision of the Gaviota Coast Plan or the Local Coastal Program that is most protective of coastal resources take precedence. This mitigation measure was incorporated into the Gaviota Coast Plan.

Findings: The Planning Commission finds that MM BIO-1 will reduce the identified significant effects on conservation plans to a level of insignificance. This mitigation measure is implemented during project review to mitigate project specific and cumulative impacts to biological resources to the maximum extent feasible.

Geologic Hazards/Soils/Mineral Resources

Impacts: The Final EIR identified potentially significant but mitigable project-specific and cumulative impacts due to: (1) soil erosion resulting from expansion of agricultural operations, especially on steeper slopes (Impact GEO-2); and (2) exposure of development to radon gas (Impact GEO-3).

Mitigation: In addition to programmatic policies and development standards in the Gaviota Coast Plan, the Final EIR identified two mitigation measures to further reduce potentially significant impacts to less than significant levels. MM GEO-1 requires the County adopt Steep Slope Guidelines into the LUDC and Article II Coastal Zoning Ordinance to minimize soil erosion associated with agricultural expansion on steep slopes. Steep Slope Guidelines developed by the Cachuma Resource Conservation District were incorporated into the Gaviota Coast Plan as Appendix D. Amendments to the LUDC and CZO incorporate provisions to implement the Steep Slope Guidelines with applicable agricultural expansion. MM GEO-2 requires incorporation of a new development standard Dev Std LU-4 into the Plan that requires new development avoid state-mapped elevated radon hazard zones, or if avoidance is infeasible, to conduct an evaluation of conformance to EPA radon gas exposure standards and apply construction standards mitigating radon concentrations to acceptable levels be required. This development standard was incorporated into the Gaviota Coast Plan.

Findings: The Planning Commission finds that MM GEO-1 and MM GEO-2, the programmatic policies and development standards of the Gaviota Coast Plan, and established engineering standards and codes (including the County Grading Ordinance and the California Building Code) will reduce impacts to a level of insignificance. This mitigation measure is implemented during project review to mitigate project specific and cumulative impacts to geologic hazards/soils/mineral resources to the maximum extent feasible.

1.1.6 FINDINGS THAT IDENTIFIED PROJECT ALTERNATIVES ARE NOT FEASIBLE

The Final EIR (15EIR-00000-00003) evaluated a no project alternative and three additional alternatives (one that identifies new and revised Plan policies to provide greater protection of resources in the Coastal Zone, one that prioritizes conservation of the Plan area’s resources and character when considering development proposals, and one that identifies additional voluntary landowner actions that provide demonstrated public benefit in exchange for incentive) as methods of reducing or eliminating potentially significant environmental impacts. The Planning Commission finds that the identified alternatives are infeasible for the reasons stated.

1. No Project Alternative

The No Project Alternative assumes that the Gaviota Coast Plan is not adopted. Under the No Project Alternative, the existing land use designations of the 1980 Land Use Element and 1982 CLUP would continue, along with implementation of the policies of these plans. None of the new policies, actions, and development standards of the Gaviota Coast Plan, which enhance protection of biological, cultural, visual, and agricultural resources, would be implemented and amendments to the LUDC and CZO would not be adopted. The Parks, Recreation, and Trails (PRT) map would not be updated with proposed new trail corridors and coastal access points. New proposed long-term actions that would protect agricultural, rural, and open space lands would not be considered or developed, such as clustered residential housing and a transfer of development rights ordinance, nor would certain agricultural permit streamlining processes and additional uses be developed to support the continuation of agriculture over the long term.

The No Project Alternative would result in greater impacts on the following resources relative to the Gaviota Coast Plan, primarily due to the absence of the new policies, actions, and development standards provided in the Gaviota Coast Plan that would provide additional resource protection:

- Land Use and Development
- Transportation and Circulation
- Aesthetics/Visual Resources
- Agricultural Resources
- Biological Resources
- Flooding and Water Resources

- Cultural and Historical Resources
- Public Services: Wildland Fires, Fire Protection, Solid Waste, Water and Wastewater Facilities
- Parks, Recreation, and Trails: Adverse Physical Environmental Effects Resulting from Additional Recreational Facilities

The No Project Alternative would result in similar impacts on the following resources relative to the Gaviota Coast Plan:

- Air Quality
- Public Services: Emergency Response Plans, Law Enforcement, Schools, Water Supplies
- Noise
- Geologic Hazards/Soils/Mineral Resources
- Hazardous Materials/Risk of Upset
- Parks, Recreation, and Trails: Increased Demand for Recreational Facilities

The No Project Alternative would not result in any reduced impacts relative to the Gaviota Coast Plan.

The No Project Alternative fails to achieve several of the basic objectives of the project. It would not meet the objective of continuing and enhancing viable, working agriculture while balancing it with the protection and enhancement of environmentally sensitive habitats. It would not enhance public access to the coast or include a robust interconnected coastal and inland trail system. It would not provide greater protection and enhancement of habitat areas and watersheds through new and enhanced policies and development standards protecting biological resources and the rezone of significant acreage in the Los Padres National Forest from outdated Ordinance 661 agricultural zones to Mountainous-Gaviota. It would not protect visual resources, cultural resources, or agricultural lands to the maximum extent feasible. In addition, the No Project Alternative could result in greater impacts to Gaviota resources, especially to visual, biological, cultural, agricultural, and recreational resources. Therefore, the Planning Commission finds that the project (as modified by incorporation of EIR mitigation measures and several components of Alternatives 1, 2 and 3) is preferable to the No Project Alternative.

2. Alternative 1: Additional Resource Protection – Coastal Zone

Alternative 1 is similar in most respects to the Gaviota Coast Plan, and includes the same rezones of public lands, new allowed uses on agricultural lands, the Critical Viewshed Corridor Overlay, and policies, actions, and development standards. The difference is that Alternative 1 would revise policies, actions, and development standards applicable to the Coastal Zone to enhance protection of riparian habitat, other habitats, and visual resources. It would also develop a new and separate permit process for the Coastal Zone, identifying

Principally Permitted Uses (not appealable to the Coastal Commission) and Permitted Uses (appealable to the Coastal Commission).

Alternative 1 would not result in greater impacts on any resources relative to the Gaviota Coast Plan.

Alternative 1 would result in similar impacts on the following resources relative to the Gaviota Coast Plan:

- Transportation and Circulation
- Agricultural Resources
- Air Quality
- Flooding and Water Resources
- Cultural and Historic Resources
- Public Services
- Noise
- Geologic Hazards/Soils/Mineral Resources
- Hazardous Materials/Risk of Upset
- Parks, Recreation, and Trails

Alternative 1 would result in reduced impacts on the following resources relative to the Gaviota Coast Plan:

- Land Use and Development
- Aesthetics/Visual Resources
- Biological Resources

Alternative 1 primarily results in similar environmental impacts and reduces some impacts to land use, aesthetics, and biological resources relative to the project by enhancing resource protection policies in the Coastal Zone. However, the reduction would not be substantial enough to eliminate Class I impacts. In response to comments received regarding the Draft EIR, the proposed project was modified to incorporate a policy component of Alternative 1. This includes Policy AG-1H to encourage land improvement programs, and Policy AG-1H (Coastal) to implement land improvement programs consistent with the CLUP. However, the remaining components of Alternative 1 would result in substantially different standards for the Coastal Zone along with a complicated permitting process. This would conflict other components of the project, such as Action AG-1 and Action AG-5.

Since this alternative would result in a less efficient permitting process without substantially reducing significant impacts, it has been deemed infeasible for social, economic and other reasons. As such, the Planning Commission finds that the project (as modified by incorporation of EIR mitigation measures and several components of Alternatives 1, 2 and 3) is preferable to Alternative 1.

3. Alternative 2: Prioritize Resource Conservation when Considering Development Proposals

Alternative 2 is similar in most respects to the Gaviota Coast Plan, and includes the same rezones of public lands, new allowed uses on agricultural lands, the Critical Viewshed Corridor Overlay, and policies, actions, and development standards. The difference is that Alternative 2 would revise four policies, actions, development standards and include 11 new development standards to afford the highest level of protection of natural, agricultural, and recreational resources, whether inland or coastal.

Alternative 2 would not result in greater impacts on any resources relative to the Gaviota Coast Plan.

Alternative 2 would result in similar impacts on the following resources relative to the Gaviota Coast Plan:

- Agricultural Resources: Land Use Compatibility/Agricultural Interface
- Air Quality
- Cultural and Historical Resources
- Public Services
- Noise
- Geologic Hazards/Soils/Mineral Resources
- Hazardous Materials/Risk of Upset

Alternative 2 would result in reduced impacts on the following resources relative to the Gaviota Coast Plan:

- Land Use and Development
- Transportation and Circulation
- Aesthetics/Visual Resources
- Agricultural Resources: Direct Conversion of Prime Agricultural Land to Non-Agricultural Use
- Biological Resources
- Flooding and Water Resources
- Parks, Recreation, and Trails

Alternative 2 primarily results in similar environmental impacts to half the resource issue areas analyzed and reduces some impacts to the other half relative to the project through the revised and new policies, actions, and development standards. However, the reduction would not be substantial enough to eliminate Class I impacts. In response to comments received regarding the Draft EIR, the project was modified to incorporate several components of Alternative 2. These include a revised Policy NS-6 as described in Alternative 2, and four proposed recreation policies and actions revised into two new actions addressing 1) coastal

land, public recreation, and open space acquisition and protection, and 2) railroad crossings and potential right-of-way use (Action REC-8 and Action REC-9).

The remaining components of Alternative 2 were found to be infeasible or unnecessary. For example, policies addressing sea level rise and bluff retreat are premature since the County is working with the Coastal Commission on coastal resiliency planning that will inform policy decisions in a future CLUP amendment. Similarly, the transportation planning policies evaluated in Alternative 2 are redundant with county-wide measures that were adopted as part of the County's Energy and Climate Action Plan.

Since all feasible components of Alternative 2 that would reduce potentially significant impacts have been incorporated into the project, the remaining components of this alternative have been deemed infeasible for social, economic and other reasons. As such, the Planning Commission finds that the project (as modified by incorporation of EIR mitigation measures and several components of Alternatives 1, 2 and 3) is preferable to Alternative 2.

4. Alternative 3: Revised Land Use Incentives Program

Alternative 3 is similar in most respects to the Gaviota Coast Plan, and includes the same rezones of public lands, new allowed uses on agricultural lands, the Critical Viewshed Corridor Overlay, and policies, actions, and development standards. The difference is that Alternative 3 would expand the incentive program described in Actions LU-4 and LU-5. Alternative 3 expands the types of actions a landowner may propose under the Residential Second Unit (RSU) incentive to include habitat restoration and restoration, maintenance, and/or landmarking an history structure. Alternative 3 includes an additional incentive for dedicating an easement for the California Coastal Trail Primary Route: an attached RSU in addition to a detached or attached RSU that could be obtained through one of the other landowner actions. In the final zoning ordinance amendments, the incentive program RSU is replaced with a new term, the "incentive dwelling unit." The new term provides full separation and distinction between standard RSUs and second dwelling units allowed under the incentive program.

Alternative 3 would not result in greater impacts on any resources relative to the Gaviota Coast Plan.

Alternative 3 would result in similar impacts on the following resources relative to the Gaviota Coast Plan:

- Transportation and Circulation
- Aesthetics/Visual Resources
- Air Quality
- Flooding and Water Resources
- Cultural and Historical Resources
- Public Services

- Noise
- Geologic Hazards/Soils/Mineral Resources
- Hazardous Materials/Risk of Upset

Alternative 3 would result in reduced impacts on the following resources relative to the Gaviota Coast Plan:

- Land Use and Development
- Agricultural Resources
- Biological Resources
- Parks, Recreation, and Trails

Alternative 3 primarily results in similar environmental impacts overall but reduces some impacts to land use, agricultural and biological resources, and parks, recreation, and trails relative to the project by expanding the types of public benefit actions that could result from the incentives program. However, the reduction would not be substantial enough to eliminate Class I impacts. The Gaviota Coast Plan was modified to incorporate Alternative 3. Therefore, the Planning Commission finds that the project (as modified by incorporation of EIR mitigation measures and several components of Alternatives 1, 2 and 3) is preferable to Alternative 3 alone.

2.0 STATEMENT OF OVERRIDING CONSIDERATIONS

The Gaviota Coast Plan, incorporated herein by reference, contains a set of goals, policies, development standards, and actions that apply to the Gaviota Coast Plan area. The Gaviota Coast Plan is part of, and consistent with, the County Comprehensive Plan, including the Coastal Land Use Plan. However, the Gaviota Coast Plan is tailored to a smaller geographical area and provides greater environmental and other benefits to the Gaviota Coast Plan area as compared to the County Comprehensive Plan and Coastal Land Use Plan.

The Final EIR (15EIR-00000-00003) and its appendices for the Gaviota Coast Plan, incorporating certain elements of Alternatives 1, 2 and 3, identify project impacts to Biological Resources and Cultural Resources in general, and to Biological, Cultural and Agricultural Resources specifically from the Parks, Recreation, and Trails component of the Plan, as significant environmental effects which are considered unavoidable. The Planning Commission therefore makes the following Statement of Overriding Considerations which warrants approval of the project notwithstanding that all identified effects on the environment are not fully avoided or substantially lessened. With respect to each of the environmental effects of the project, the Planning Commission finds that the stated overriding benefits of the project outweigh the significant effects on the environment and that there is no feasible way to lessen or avoid the significant effects. Pursuant to Public Resources Code Section 21081(b) and CEQA Guidelines Sections 15043, 15092 and 15093, any remaining significant effects on the environment are acceptable due to these overriding considerations:

- A. The Gaviota Coast Plan provides for necessary and orderly development to accommodate population growth within the 20-year planning horizon consistent with Government Code Section 65060.1 and the goals and policies of the County of Santa Barbara Comprehensive Plan.
- B. The Gaviota Coast Plan (GCP) provides for orderly economic and population growth within a reasonable 20-year time horizon in accordance with the Gaviota Coast Plan Area's available public and private services (GCP Purpose and Intent, Policy LU-10); protects agriculture (GCP Policies AG-1.A and AG-1.B); provides recreation and open space areas, including provisions for public trails and coastal access points in general, and the California Coastal Trail in particular (GCP Policies REC-1, REC-2, and REC-6); protects natural resources (GCP Policies NS-2, NS-4, and NS-6 through NS-11); preserves the area's character and scenic views (GCP Policies VIS-1 through VIS-17); and balances the needs of future residents with the needs of existing residents.
- C. The Gaviota Coast Plan has the potential to limit adverse impacts and contribute to the long-term protection of the Gaviota Coast's environment by reducing potential impacts to biological resources through the application of the Environmentally Sensitive Habitat Overlay in the Inland Area, the Mountainous-Gaviota zone in the Los Padres National Forest, and the Recreation zone on California State Parks land; continuance of the Environmentally Sensitive Habitat Overlay in the Coastal Zone; and by preserving viable agriculture in Rural Areas.
- D. The Gaviota Coast Plan incorporates a new Parks, Recreation, and Trails (PRT) map identifying a robust interconnected coastal and inland trail system. The Plan also incorporates numerous policies, actions, and development standards that promote the acquisition of easements and construction of trails, trailheads, and coastal access points depicted on the PRT map. This includes the California Coastal Trail, which is a high priority at both the state and local levels.
- E. The Gaviota Coast Plan incorporates numerous policies, development standards, and actions that avoid or minimize significant environmental effects of actions proposed or allowed under the Gaviota Coast Plan (e.g., Natural Resources Stewardship, Cultural Resources Stewardship, and Land Use policies, actions, and development standards). Thus, the Gaviota Coast Plan is "self-mitigating" to a large degree.
- F. The Gaviota Coast Plan protects valuable, actively-farmed, prime and non-prime agricultural lands by maintaining large minimum parcel sizes and adopting policies and development standards to ensure continued viability of agriculture, including Agricultural Element policies modified to apply within the Coastal Zone of the Gaviota Coast Plan Area.
- G. The Gaviota Coast Plan protects important biological resources of the various habitats found within the Gaviota Coast Plan area through its biological resources protection policies, actions, and development standards ("Natural Resources Stewardship") and by rezoning National Forest mountainous lands to Mountainous - Goleta. The Gaviota Coast Plan preserves the value of these lands for their important biologic, hydrologic, and aesthetic qualities in accordance with the Conservation Element, Preservation of Natural Systems.

- H. The Gaviota Coast Plan policies, actions, and development standards protect and preserve historical, archaeological, and tribal cultural resources to the maximum extent feasible in accordance with the Land Use Element Historical and Archaeological Sites Policies 1 through 5; the Conservation Element Archaeological Sites Conclusions and Recommendations; the Coastal Land Use Plan Policies 10-1 through 10-5; and recent State law (Assembly Bill 52).
- I. The Gaviota Coast Plan protects coastal bluffs, hillsides, watersheds, and creeks through a Site Design Hierarchy and Design Guidelines for new development, and Trail Siting Guidelines for new trail easement acquisition and development, all of which direct development and trails to be sited where grading and erosion can be minimized, and avoid bluffs and creeks, etc. The Plan also accomplishes this through the Steep Slope Guidelines that reduce potential water quality degradation and erosion associated with installation of new agriculture on steep slopes ($\geq 30\%$), and development limitations on extreme slopes ($> 40\%$) through application of the Mountainous Area land use and zoning designations. The Plan also protects creeks through GCP Policies NS-4, NS-7, NS-9, and NS-11, and Dev Std NS-2 (Inland and Coastal).
- J. The Gaviota Coast Plan provides clarity for future developers and land use regulators. The plan's clear and updated policies and development standards will streamline the project-review process for individual applications for future development by providing a framework that can reduce the amount of future project-specific review, environmental review, time, uncertainty, and cost in the permit process.

3.0 ENVIRONMENTAL REPORTING AND MONITORING PROGRAM

Public Resources Code Section 21081.6 and CEQA Guidelines Section 15091(d) require the County to adopt a reporting or monitoring program for the changes to the project that it has adopted or made a condition of approval in order to avoid or substantially lessen significant effects on the environment. The project is an area plan, prepared as a component of the County's Comprehensive Plan and the Local Coastal Program. The EIR has been prepared as a Program EIR pursuant to CEQA Guidelines Section 15168. The degree of specificity in the EIR corresponds to the specificity of the general or program level policies of the Project and to the effects that may be expected to follow from the adoption of the Project. The EIR is not as detailed as an EIR on specific development projects or implementation programs that might follow.

All mitigation measures identified in the Final EIR (15EIR-00000-00003) have been incorporated directly into the Gaviota Coast Plan as shown in Attachment A of the staff report to the Planning Commission dated July 20, 2016, as modified by the Planning Commission on September 14, 2016, with the exception of MM VIS-1, adoption of the Gaviota Coast Plan Design Guidelines. The Design Guidelines are adopted by separate resolution (Attachment D-7 of staff report dated July 20, 2016) as a standalone implementation document. To ensure compliance with mitigation measures during implementation of future development under the Gaviota Coast Plan, the County LUDC and CZO ordinance amendments (Attachment D-2 13ORD-00000-00006 and Attachment D-5 13ORD-00000-00007, respectively, to the staff memo dated September 7, 2016) include requirements that development in the Plan Area comply with each policy, action or development standard required by each adopted mitigation measure, as applicable to the type of proposed development. Therefore, a

separate mitigation monitoring and reporting program is not necessary, and the Planning Commission finds the Gaviota Coast Plan and amendments to the County LUDC and CZO sufficient for a monitoring and reporting program.

4.0 ADMINISTRATIVE FINDINGS

4.1 AMENDMENTS TO THE COMPREHENSIVE PLAN, DEVELOPMENT CODE AND COUNTY ZONING MAP (REZONE) FINDINGS

Findings required for all amendments to the Comprehensive Plan, Development Code, and the County Zoning Map. In compliance with Section 35.104.060 of the County Land Use and Development Code (LUDC), prior to the approval or conditional approval of an Amendment to the Comprehensive Plan, Development Code, or Zoning Map, the review authority shall first make all of the following findings, as applicable:

4.1.1 The request is in the interests of the general community welfare.

As discussed in Attachment C (a thorough review of the Gaviota Coast Plan's consistency with applicable Comprehensive Plan policies) of the staff memo to the Planning Commission, dated September 7, 2016, herein incorporated by reference, the project is in the interests of the general community welfare. As it pertains to the Gaviota Coast, the County Land Use Element is outdated (adopted in 1980) and does not fully address current community and stakeholder concerns. The Gaviota Coast Plan strengthens the goals of protecting the important resources of the Plan Area, including productive agriculture, mountainous areas, sensitive biological and cultural resources, aesthetics and visual resources, and avoids and mitigates adverse effects where feasible. In doing so, the project accommodates development to a degree and in a manner which provides the greatest community welfare without compromising community values, environmental quality, or the public health and safety. Moreover, it provides the framework for a more efficient permit process. Overall, the Gaviota Coast Plan, the LUDC amendments, and revisions to the zoning maps, which would enhance protection of agricultural resources, sensitive biological resources, cultural resources, and aesthetics, are in the interests of the general community welfare.

4.1.2 The request is consistent with the Comprehensive Plan, the requirements of State planning and zoning laws, and this Development Code.

As discussed in Attachment C (a thorough review of the Gaviota Coast Plan's consistency with applicable Comprehensive Plan policies) of the staff memo to the Planning Commission, dated September 7, 2016, herein incorporated by reference, the project is consistent with the Comprehensive Plan and the LUDC. The Gaviota Coast Plan is broad and comprehensive in scope, covering issues important to the community including but not limited to those in the Land Use, Energy, Scenic Highways, Conservation, Agricultural, and Open Space elements of the Comprehensive Plan. Adoption of the Gaviota Coast Plan and associated amendments to the County LUDC and zoning maps will provide more effective consistency with State planning and zoning laws by providing a clearer and more efficient permit process that will benefit the public. The LUDC is amended to be consistent with the Gaviota Coast Plan, and

the proposed project is consistent with the remaining portions of the LUDC that would not be revised by the LUDC ordinance amendment. In the future, individual projects developed in compliance with the Gaviota Coast Plan will also be assessed for consistency with all applicable requirements of the LUDC. Therefore, the Gaviota Coast Plan is consistent with the Comprehensive Plan, State planning and zoning laws, and the County LUDC.

4.1.3 The request is consistent with good zoning and planning practices.

As discussed in Attachment C (a thorough review of the Gaviota Coast Plan’s consistency with applicable Comprehensive Plan policies) of the staff memo to the Planning Commission, dated September 7, 2016, herein incorporated by reference, the project is consistent with good zoning and planning practices. The Gaviota Coast Plan incorporates sustainable zoning and planning practices into the Plan and the LUDC amendments. For example, the project enhances protection of sensitive biological, cultural, agricultural, and aesthetic/visual resources. The LUDC amendments incorporate other successful regulations used elsewhere in the unincorporated Santa Barbara County, such as ESH permit requirements comparable to the existing LUDC regulations for the unincorporated Toro Canyon Plan and Eastern Goleta Valley Community Plan areas, and outdoor lighting regulations comparable to those adopted for the Santa Ynez Valley, Mission Canyon, Summerland, and Eastern Goleta Valley community plans. Adoption of the Gaviota Coast Plan and associated amendments to the County LUDC and zoning maps will also provide a clearer and more efficient permit process. Therefore, the project is consistent with good zoning and planning practices.

4.1.4 The request is deemed to be in the public interest.

As discussed in Attachment C (a thorough review of the Gaviota Coast Plan’s consistency with applicable Comprehensive Plan policies) of the staff memo to the Planning Commission, dated September 7, 2016, herein incorporated by reference, the project is deemed to be in the public interest. The general plan amendment is in the public interest for the following reasons. The Gaviota Coast Plan addresses future development in the Gaviota Coast Plan area. It proposes new, policies, actions, and development standards to protect rural agricultural resources, to protect biological resources and water quality, and to preserve community character while allowing for a clearer and more efficient permitting process. The primary intent of the Gaviota Coast Plan is to articulate the community’s expressed desire to preserve agricultural and the natural resources that make the Gaviota Coast a unique area, and enhance the quality of life enjoyed by residents and visitors. Overall, it is in the public interest to address future development in the Gaviota Coast Plan area by adopting the goals, policies, actions, and development standards of the Gaviota Coast Plan.

4.2 AMENDMENT TO ARTICLE II, LCP, OR ZONING MAP AMENDMENT (REZONE) FINDINGS

Findings required for All Amendments to the Article II Zoning Ordinance, the Local Coastal Program, and the County Zoning Map. In compliance with Section 35-180.6 of the Article II Zoning Ordinance, prior to the approval or conditional approval of an Amendment to the Article II

Zoning Ordinance, the Local Coastal Program or the County Zoning Map, the decision-maker shall first make all of the following findings:

4.2.1 The request is in the interests of the general community welfare.

As discussed in Attachment C (a thorough review of the Gaviota Coast Plan’s consistency with applicable Comprehensive Plan policies, including the Coastal Land Use Plan) of the staff memo to the Planning Commission, dated September 7, 2016, herein incorporated by reference, the project is in the interests of the general community welfare. As it pertains to the Gaviota Coast, the Coastal Land Use Plan is outdated (adopted in 1982) and does not fully address current community and stakeholder concerns. The Gaviota Coast Plan strengthens the goals of protecting the important resources of the Plan Area, including productive agriculture, mountainous areas, sensitive biological and cultural resources, aesthetics and visual resources, and avoids and mitigates adverse effects where feasible. No significant land use and zoning changes are proposed in the Coastal Zone and potential residential development density would not increase. The project accommodates development to a degree and in a manner which provides the greatest community welfare without compromising community values, environmental quality, or the public health and safety. Moreover, it provides the framework for a more efficient permit process. Overall, the Gaviota Coast Plan, the Article II amendments, and revisions to the zoning maps are in the interests of the general community welfare.

4.2.2 The request is consistent with the Comprehensive Plan, the Coastal Land Use Plan, the requirements of the State planning and zoning laws, and this Article.

As discussed in Attachment C (a thorough review of the Gaviota Coast Plan’s consistency with applicable Comprehensive Plan policies, including the Coastal Land Use Plan) of the staff memo to the Planning Commission, dated September 7, 2016, herein incorporated by reference, the project is consistent with the Comprehensive Plan, the Coastal Land Use Plan, and the Article II Coastal Zoning Ordinance. The Gaviota Coast Plan is broad and comprehensive in scope, covering issues important to the community including but not limited to those in the Land Use, Energy, Scenic Highways, Conservation, Agricultural, and Open Space elements of the Comprehensive Plan. Adoption of the Gaviota Coast Plan and associated amendments to the Article II Coastal Zoning Ordinance and zoning maps will provide more effective consistency with State planning and zoning laws by providing a clearer and more efficient permit process that will benefit the public. The Article II Coastal Zoning Ordinance is amended to be consistent with the Gaviota Coast Plan. In addition, the proposed project is consistent with the remaining portions of Article II that would not be revised by the Article II Coastal Zoning Ordinance Amendment. In the future, individual projects developed in compliance with the Gaviota Coast Plan will also be assessed for consistency with all applicable requirements of Article II. Therefore, the Gaviota Coast Plan is consistent with the Comprehensive Plan, including the Coastal Land Use Plan, State planning and zoning laws, and Article II.

4.2.3 The request is consistent with good zoning and planning practices.

As discussed in Attachment C (a thorough review of the Gaviota Coast Plan’s consistency with applicable Comprehensive Plan policies, including the Coastal Land Use Plan) of the staff memo to the Planning Commission, dated September 7, 2016, herein incorporated by reference, the project is in the interests of the general community welfare. The Gaviota Coast Plan incorporates sustainable zoning and planning practices into the Plan and the Article II Coastal Zoning Ordinance amendments. For example, the project enhances protection of sensitive biological, cultural, agricultural, and aesthetic/visual resources. The Article II amendments include successful regulations used elsewhere in the unincorporated Santa Barbara County, for example, agricultural permit streamlining. The Article II amendments also include outdoor lighting regulations comparable to those adopted for the Santa Ynez Valley, Mission Canyon, Summerland, and Eastern Goleta Valley community plans. Adoption of the Gaviota Coast Plan and associated amendments to the Article II Coastal Zoning Ordinance and zoning maps will also provide a clearer and more efficient permit process. Therefore, the project is consistent with zoning and planning practices.

4.1.4 The request is deemed to be in the public interest.

As discussed in Attachment C (a thorough review of the Gaviota Coast Plan’s consistency with applicable Comprehensive Plan policies, including the Coastal Land Use Plan) of the staff memo to the Planning Commission, dated September 7, 2016, herein incorporated by reference, the project is deemed to be in the public interest. The general plan amendment is in the public interest for the following reasons. The Gaviota Coast Plan addresses future development in the Gaviota Coast Plan area. It proposes new, policies, actions, and development standards to protect rural agricultural resources, to protect biological resources and water quality, and to preserve community character while allowing for a clearer and more efficient permitting process. The primary intent of the Gaviota Coast Plan is to articulate the community’s expressed desire to preserve agricultural and the natural resources that make the Gaviota Coast a unique area, and enhance the quality of life enjoyed by residents and visitors. Overall, it is in the public interest to address future development in the Gaviota Coast Plan area by adopting the goals, policies, actions, and development standards of the Gaviota Coast Plan.

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ATTACHMENT C

Policy Consistency Analysis

Policy Requirement	Discussion
Land Use Element (LUE)	
<p>LUE Land Use Development Policy #3: No urban development shall be permitted beyond boundaries of land designated for urban uses except in neighborhoods in rural areas.</p>	<p>Consistent. The Gaviota Coast Plan Area is located entirely within a rural area of the County and does not abut the Urban-Rural Boundary. One existing rural neighborhood at Arroyo Quemado is being designated as a Rural Neighborhood, as defined in the Coastal Land Use Plan (CLUP), such that these higher density residential developments do not expand into the surrounding Rural Area. The Plan includes Policy LU-1, which incorporates all pertinent Comprehensive Plan policies and prohibits alteration of the Plan boundary except as part of a County-initiated update of the proposed Plan. Limiting alteration of the Plan boundary except as part of a County-initiated update of the proposed Plan would prevent potential encroachment of urban uses within the Plan Area.</p>
<p>LUE Land Use Development Policy #4: 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.</p> <p>Affordable housing projects proposed pursuant to the Affordable Housing Overlay regulations, ...</p>	<p>Consistent. The Plan incorporates Policy TEI-17, which restricts annexations to water or sanitary districts or extensions of sewer lines unless required to prevent adverse impacts on an environmentally sensitive habitat, or to protect public health. Existing policies would continue to be implemented upon review of site-specific development. A finding that adequate services are available for each future project must be made on a case-by-case basis, especially as most development within the Plan Area will rely on private services. The Plan also includes several development standards (Dev Std TEI-2, TEI-6, TEI-7 and TEI-8) that ensure private sewage disposal systems (septic systems) are adequate. There are no Affordable Housing Overlays within the Gaviota Coast Program. Due to its rural location and lack of adequate services for high density, urban, residential development, affordable housing programs are not considered for the Plan Area.</p>
<p>LUE Hillside and Watershed Protection Policy #1: 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.</p> <p>LUE Hillside and Watershed Protection Policy #2: 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</p>	<p>Consistent. The Plan's Natural Resource and Stewardship policies call for a watershed-based approach for land use and development and contain policies intended to minimize environmental impacts of land development. Existing LUE Hillside and Watershed Protection policies would continue to be implemented upon review of site-specific development. Additional Plan policies and actions will also ensure that future development be located, designed and constructed in a manner that would ensure consistency with these Hillside and Watershed Protection policies, as provided below.</p> <p>The Plan incorporates a systematic hierarchy of site</p>

Policy Requirement	Discussion
<p>feasible. Areas of the site which are not suited to development because of known soil, geologic, flood, erosion or other hazards shall remain in open space.</p> <p>LUE Hillside and Watershed Protection Policy #3: For necessary grading operations on hillsides, the smallest practical area of land shall be exposed at any one time during 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.</p> <p>LUE Hillside and Watershed Protection Policy #4: 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 through the development process to remove sediment from runoff waters. All sediment shall be retained on-site unless removed to an appropriate dumping location.</p> <p>LUE Hillside and Watershed Protection Policy #5: Temporary vegetation, seeding, mulching, or other suitable stabilization methods shall be used to protect soils subject to erosion that have been distributed during grading or development. All cut and fill slopes shall be stabilized as rapidly as possible with planting of native grasses and shrubs, appropriate non-native plants, or with accepted landscaping practices.</p> <p>LUE Hillside and Watershed Protection Policy #6: 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 onsite whenever possible to facilitate groundwater recharge.</p>	<p>design and treatment issues to ensure a consistent approach to implementing visual resources protection on the Gaviota Coast. The Site Design Hierarchy establishes a priority ranking of preferred site design components to avoid or lessen visual impacts; siting development to minimize grading as it relates to visual impacts is consistent with policies to minimize grading in general. Policy VIS-2 requires adherence to the Site Design Hierarchy.</p> <p>Policy AG-3.B requires that grading and brush clearing for new agricultural improvements on hillsides shall not cause excessive erosion or downslope damage.</p> <p>Action AG-3 directs the County to prepare steep slopes development standards for agricultural development on slopes of 30 to 40 percent or greater on agriculturally-zoned land. The standards may include preparation of an erosion control plan with best management practices to ensure slope stabilization, soil conservation, and water quality control, preferred land clearing methods, and provisions for reclamation when the operation has been abandoned. To fulfill this requirement, the Gaviota Coast Plan incorporates Steep Slope Guidelines, developed by the Cachuma Resource Conservation District, which are consistent with the requirements of Action AG-3, as Appendix D to the Plan and zoning ordinance amendments require implementation of the guidelines for applicable projects. In the final Plan, Action AG-3 is replaced by new Dev Std AG-3, which requires adherence to the Steep Slope Guidelines on slopes of 30% or greater.</p> <p>Policy REC-5 provides siting and design considerations applicable to future trails siting including a provision that proposed trail alignments avoid areas that are highly geologically unstable or especially prone to erosion.</p> <p>Policy REC-6 provides coastal trail siting and design considerations applicable to future trail siting and provides that vertical beach access should utilize natural topography.</p> <p>Policy LU-4 provides guidelines for development siting of non-agricultural development, including respect for site constraints such as steep slopes.</p> <p>Policy AG-2.A: Prevention of Flooding and Sedimentation, requires measures designed for the prevention of flooding and sedimentation resulting from urbanization, especially as such damage relates to new non-agricultural development.</p> <p>Action TEI-5 is intended to minimize private road and driveway impacts and requires appropriate planting of</p>

Policy Requirement	Discussion
	slopes and submittal of detailed drainage and erosion control plans and requires certification from a qualified engineer that erosion impacts from road construction are adequately mitigated.
<p>LUE Hillside and Watershed Protection Policy #7: Degradation of the water 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.</p> <p>LUE Streams and Creeks Policy #1: All permitted construction and grading within stream corridors shall be carried out in such a manner as to minimize impacts from increased runoff, sedimentation, biochemical degradation, or thermal pollution.</p>	<p>Consistent. Policy TEI-14 requires minimization of surface and groundwater pollution to the maximum extent practicable. The Plan includes several development standards (Dev Std TEI-2, TEI-6 and TEI-7) that protect surface and ground water quality through compliance with the County’s Local Agency Management Program (LAMP, approved by the Regional Water Quality Control Board) and Chapter 18c of the County Code, which require leach fields to decrease the amount of nitrates filtering through soil to groundwater by requiring specified measures, locate septic systems and other sources of water pollution a minimum of 100 feet from riparian corridors, among requirements. Dev Std TEI-8 prohibits approval of septic systems where impacts to creek water quality would occur. In addition the Plan includes policies and development standards that limit development within stream corridors. Development standard Dev Std NS-2 requires mapped riparian ESH overlay areas to have a development area setback buffer of 100 feet from the edge of either side of top-of-bank of creeks or existing edge of riparian vegetation, whichever is further.</p>
<p>LUE Flood Hazard Area Policy #1: 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.</p> <p>LUE Flood Hazard Area Policy #2: Permitted development shall not cause or contribute to flood hazards or lead to expenditure of public funds for flood control works, i.e., dams, stream channelization’s, etc.</p>	<p>Consistent. Policy AG-2.A requires measures for prevention of flooding and sedimentation resulting from urbanization. The Flood Hazard Overlay is a land use and zoning overlay and is depicted on the land use overlay maps of the Plan (Figures 5-1, 5-3, and 5-5) and the land use and overlay maps attached to the LUE general plan amendment and the County Land Use and Development Code (LUDC) rezone ordinance amendment.</p>
<p>LUE Historic and Archaeological Sites Policy #1: All available measures, including purchase, tax relief, purchase of development rights, etc., shall be explored to avoid development on significant historic, prehistoric, archaeological, and other classes of cultural sites.</p> <p>LUE Historic and Archaeological Sites Policy #2: When developments are proposed for parcels where</p>	<p>Consistent. The Plan includes a policy framework (cultural resource stewardship policies) to preserve significant cultural, archaeological, and historical resources to the maximum extent feasible. Of note, the Plan includes policies that address the importance of cultural resources and the need for avoidance, protection, or other mitigation (Policies CS-1 and CS-2),</p>

Policy Requirement	Discussion
<p>archaeological or other cultural sites are located, project design shall be required which avoids impacts to such cultural sites if possible.</p> <p>LUE Historic and Archaeological Sites Policy #3: When sufficient planning flexibility does not permit avoiding construction on archaeological or other types of cultural sites, adequate mitigation shall be required. Mitigation shall be designed to accord with guidelines of the State Office of Historic Preservation and the California Native American Heritage Commission.</p> <p>LUE Historic and Archaeological Sites Policy #4: Off-road vehicle use, unauthorized collection of artifacts, and other activities other than development which could destroy or damage archaeological or cultural sites shall be prohibited.</p>	<p>and require preparation of archaeological surveys and studies (Dev Stds CS-1 and CS-2). Implementing actions and development standards support Native American (government-to-government) consultation (Action CS-4), tribal access (Action CS-6), and protecting the confidentiality of traditional cultural, historical, and spiritual areas (Action CS-5). The Plan policy framework supports and helps to implement compliance with the Historic and Archaeological Sites policies, which will continue to apply after adoption of the Plan.</p>
<p>LUE Historic and Archaeological Sites Policy #5: Native Americans shall be consulted when development proposals are submitted which impact significant archaeological or cultural sites.</p>	<p>Consistent. The Plan includes Action CS-4 which requires the County to continue its government-to-government consultations with the tribes identified by the Native American Heritage Commission (NAHC) pursuant to AB 52 and SB 18 to ensure that traditional resources of concern to the Chumash are identified and taken into account in future development planning. Dev Stds CS-3 and CS-4 similarly require consultation with Native Americans when development proposals could impact significant archaeological or cultural sites and requires consultation with Chumash during each stage of cultural resources review.</p>
<p>LUE Parks/Recreation Policy #1: Bikeways shall be provided where appropriate for recreational and commuting use.</p> <p>LUE Parks/Recreation Policy #3: Future development of parks should emphasize meeting the needs of the local residents.</p> <p>LUE Parks/Recreation Policy #4: Opportunities for hiking and equestrian trails should be preserved, improved, and expanded wherever compatible with surrounding uses.</p> <p>LUE Parks/Recreation Policy #5: Schools and other public-owned lands should be utilized for joint use recreational activities whenever possible.</p>	<p>Consistent. The Plan includes a goal to protect existing public access and actively promote expansion of recreation, open space, coastal access, and trails within the Gaviota Coast (Goal REC-1). Action REC-7 would require the County to work with affected agencies to reopen the closed segment of the existing Class I bikeway that links El Capitan and Refugio State Beaches. Numerous other policies, implementing actions and development standards are proposed to support provision of trails, including for equestrian use where appropriate (e.g., Policies REC-1 through REC-4, REC-7 through REC-11). Trail siting and design considerations (Policy REC-5) would include consideration of the potential impacts of trail development from the landowner perspective, and seek to avoid or minimize conflicts with surrounding land uses.</p>
<p>LUE Visual Resource Policy #1: All commercial, industrial, and planned developments shall be required to submit a landscaping plan to the County for approval.</p>	<p>Consistent. The Plan includes a Site Design Hierarchy (Chapter 6: Visual Resources), which provides the framework for siting and design criteria under the visual resource policies. Policy VIS-2 requires adherence to the</p>

Policy Requirement	Discussion
	Site Design Hierarchy and Gaviota Coast Plan Design Guidelines, which include landscaping requirements to provide visual softening and screening.
<p>LUE Visual Resource Policy #2: In areas designated as rural on the land use plan maps, the height, scale, and design of structures shall be compatible with the character of the surrounding natural environment, except where technical requirements dictate otherwise. Structures shall be subordinate in appearance to natural landforms; shall be designed to follow the natural contours of the landscape; and shall be sited so as not to intrude into the skyline as seen from public viewing places.</p>	<p>Consistent. Plan Policy VIS-2 requires visually subordinate development as seen from public viewing places. Visually subordinate development would be achieved through adherence to the Site Design Hierarchy and Gaviota Coast Plan Design Guidelines. Existing policies would continue to be implemented upon review of site-specific development. Policy VIS-3 requires development avoid intrusion into the skyline and Policy VIS-4 prohibits development from being sited on ridgelines to the maximum extent feasible. The Plan also includes the Critical Viewshed Corridor Overlay that applies to development within primary public views from Highway 101. These requirements further support and enhance LUE Visual Resource Policy #2.</p>
<p>LUE Visual Resource Policy #4: Signs shall be of size, location, and appearance so as not to detract from scenic areas of views from public roads and other viewing points.</p>	<p>Consistent. The Plan includes Action TEI-1 which encourages Caltrans to prepare Highway 101 Design Guidelines in coordination with the County, Coastal Commission, Santa Barbara County Association of Governments, State Department of Parks and Recreation, and local citizens. Design criteria would address signs and other highway related improvements and would ensure improvements are inconspicuous and are in harmony with the rustic natural setting of the Gaviota Coast.</p>
<p>LUE Visual Resource Policy #5: Utilities, including television, shall be placed underground in new developments in accordance with the rules and regulations of the California Public Utilities Commission, except where cost of undergrounding would be so high as to deny service.</p>	<p>Consistent. The Site Design Hierarchy and Gaviota Coast Plan Design Guidelines included in the proposed Plan require the visibility of utilities to be eliminated or minimized from public viewing places.</p>
Coastal Land Use Plan (CLUP)	
<p>CLUP Policy 2-1: In order to obtain approval for a division of land, the applicant shall demonstrate that adequate water is available to serve the newly created parcels except for parcels designated as “Not a Building Site” on the recorded final or parcel map.</p> <p>CLUP Policy 2-6: 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.</p>	<p>Consistent. The Plan incorporates Policy TEI-17, which restricts annexations to water or sanitary districts or extensions of sewer lines unless required to prevent adverse impacts on an environmentally sensitive habitat, or to protect public health. Existing policies would continue to be implemented upon review of site-specific development and land divisions. A finding that adequate services are available for each future project, including land divisions, must be made on a case-by-case basis, especially as most development within the Plan Area will rely on private services. The Plan also includes several development standards (Dev Std TEI-2, TEI-6,</p>

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<p>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. Where an affordable housing project is proposed pursuant to the Affordable Housing Overlay regulations, ...</p>	<p>TEI-7 and) that ensure private sewage disposal systems (septic systems) are adequate. There are no Affordable Housing Overlays within the Gaviota Coast Program. Due to its rural location and lack of adequate services for high density, urban, residential development, affordable housing programs are not considered for the Plan Area.</p>
<p>CLUP Policy 2-2: The long term integrity of groundwater basins or sub-basins located wholly within the coastal zone shall be protected. To this end, the safe yield as determined by competent hydrologic evidence of such a groundwater basin or sub-basin shall not be exceeded except on a temporary basis as part of a conjunctive use or other program managed by the appropriate water district. If the safe yield of a groundwater basin or sub-basin is found to be exceeded for reasons other than a conjunctive use program, new development, including land division and other use dependent upon private wells, shall not be permitted if the net increase in water demand for the development causes basin safe yield to be exceeded, but in no case shall any existing lawful parcel be denied development of one single family residence. This policy shall not apply to appropriators or overlying property owners who wish to develop their property using water to which they are legally entitled pursuant to an adjudication of their water rights.</p>	<p>Consistent. A portion of the eastern area of the Gaviota Coast Plan Area (i.e., east of El Capitan State Beach) is located within, and served by the Goleta Water District. The remainder of the Plan Area is served by several small private water companies or individual private wells that rely on groundwater. No policies of the Plan would conflict with this policy or lead to increases in water use beyond safe yields. In any case, this policy would continue to apply to any future development.</p>
<p>CLUP Policy 2-3: In the furtherance of better water management, the County may require applicants to install meters on private wells and to maintain records of well extractions for use by the appropriate water district.</p> <p>CLUP Policy 2-5: Water-conserving devices shall be used in all new development.</p>	<p>Consistent. The Plan’s Site Design Hierarchy requires identification of water availability, including quality and quantity. The Plan also includes Action TEI-8 which requires the County to consider adopting the State’s Nonpotable Water Reuse Systems regulations. These policies would continue to be implemented upon review of site-specific development. In addition, The Gaviota Coast Plan Design Guidelines prioritize the use of native plant materials in landscaping followed by drought-tolerant, non-natives.</p>
<p>CLUP Policy 2-10: Annexation of a rural area(s) to a sanitary district or extensions of sewer lines into rural area(s) as defined on the land use plan maps shall not be permitted unless required to prevent adverse impacts on an environmentally sensitive habitat, to protect public health, or as a logical extension of services.</p>	<p>Consistent. No new rural annexation requests in the Coastal Zone will occur as a result of the Plan. In addition, the Plan includes Policy TEI-17, which restricts annexation to water or sanitary districts or extensions of sewer lines unless required to prevent adverse impacts on an environmentally sensitive habitat, or to protect public health, consistent with CLUP Policy 2-10.</p>
<p>CLUP Policy 2-11: All development, including agriculture, adjacent to areas designated on the land use</p>	<p>Consistent. The Plan includes various policies intended to ensure that agriculture is conducted in an</p>

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<p>plan or resource maps as environmentally sensitive habitat areas, shall be regulated to avoid adverse impacts on habitat resources. Regulatory measures include, but are not limited to, setbacks, buffer zones, grading controls, noise restrictions, maintenance of natural vegetation, and control of runoff.</p>	<p>environmentally sensitive manner. Policy NS-2 requires protection of ESH areas and states that ESH shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas. Policy NS-4 provides criteria for habitat designation as ESH and identifies those sensitive biological resources that qualify and are designated ESH by the Plan. Policy NS-10 calls for habitat buffers and Dev Std NS-2 (COASTAL) establishes buffers for identified ESH areas consistent with other CLUP policies. Policy LU-1 reiterates CLUP Policy 1-2 that requires the policy or provision that is most protective of coastal resources shall take precedence. Finally, Goal AG-3 would encourage agricultural operations to incorporate techniques such as soil conservation and Policy AG-3.B would ensure grading and brush clearing does not cause excessive erosion or downslope damage.</p>
<p>CLUP Policy 2-13: The existing townsite of Naples is within a designated rural area and is remote from urban services. The County shall discourage residential development of existing lots. The County shall encourage and assist the property owner(s) in transferring development rights from the Naples townsite to an appropriate site within a designated urban area which is suitable for residential development. If the County determines that transferring development rights is not feasible, the land use designation of AG-II-100 should be re-evaluated.</p>	<p>Consistent. These policies apply uniquely to the Naples Townsite. The Plan does not change any land uses or policies associated with the Naples Townsite. In addition, the Plan includes a future action item, Action LU-2, to develop a transfer of development rights ordinance.</p>
<p>CLUP Policy 2-15: The County shall not issue permits for non-exempt development on the Hollister Ranch unless the Coastal Commission certifies that the requirements of PRC Section 30610.3 have been met by each applicant or that the Commission finds that access is otherwise provided in a manner consistent with the access policies of the Coastal Act.</p>	<p>Consistent. The Plan includes goals and policies to encourage and promote public coastal access. Policy REC-2 requires the County to actively promote expansion of public trails, coastal access and recreational opportunities within the Plan Area, using its regulatory authority, incentives and other tools to acquire and develop trails, coastal access and recreational facilities. For all pending private and public development projects with planned or existing recreational uses, the County shall fully explore options for new trails, coastal access and parking, and ways to promote their acquisition and development through the environmental and planning review processes. The Plan does not include revisions to the existing land use or zoning within Hollister Ranch. Existing policies will continue to be implemented upon review of site-specific development</p>
<p>CLUP Naples Townsite Policies 2-25 through 2-33</p>	<p>Consistent. These policies apply uniquely to the Naples Townsite. The Plan does not change any land uses or policies associated with the Naples Townsite and</p>

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	<p>specific development proposals are not part of the Plan. These policies would be implemented upon review of site-specific development.</p>
<p>CLUP Policy 3-1: Seawalls shall not be permitted unless the County has determined that there are no other less environmentally damaging alternatives reasonably available for protection of existing principal structures. ...</p> <p>CLUP Policy 3-2: Revetments, groins, cliff retaining walls, pipelines and outfalls, and other such construction that may alter natural shoreline processes shall be permitted when designed to eliminate or mitigate adverse impacts on local shoreline sand supply and so as not to block lateral beach access.</p> <p>CLUP Policy 3-3: To avoid the need for future protective devices that could impact sand movement and supply, no permanent above-ground structures shall be permitted on the dry sandy beach except facilities necessary for public health and safety, such as lifeguard towers, or where such restriction would cause the inverse condemnation of the parcel by the County.</p>	<p>Consistent. The Plan does not include any new policies addressing seawalls and shoreline structures; and therefore, would not conflict with these CLUP policies. These policies would be implemented upon review of site-specific development.</p>
<p>CLUP Policy 3-4: In areas of new development, above-ground structures shall be set back a sufficient distance from the bluff edge to be safe from the threat of bluff erosion for a minimum of 75 years, unless such standard will make a lot unbuildable, in which case a standard of 50 years shall be used. The County shall determine the required setback. A geologic report shall be required by the County in order to make this determination. At a minimum, such geologic report shall be prepared in conformance with the Coastal Commission’s adopted Statewide Interpretive Guidelines regarding “Geologic Stability of Bluff top Development.”</p> <p>CLUP Policy 3-5: Within the required bluff top setback, drought-tolerant vegetation shall be maintained. Grading, as may be required to establish proper drainage or to install landscaping, and minor improvements, i.e., patios and fences that do not impact bluff stability, may be permitted. Surface water shall be directed away from the top of the bluff or be handled in a manner satisfactory to prevent damage to the bluff by surface and percolating water.</p> <p>CLUP Policy 3-6: Development and activity of any kind beyond the required bluff-top setback shall be constructed to insure that all surface and subsurface drainage shall not contribute to the erosion of the bluff face or the stability of the bluff itself.</p>	<p>Consistent. The proposed Plan includes Policy REC-5 which provides siting and design considerations for trails and includes consideration of bluff erosion as a siting criterion. The Plan does not encourage residential development potential near bluffs, and Dev Std LU-2 requires sea level rise and coastal hazard analyses for near-shore development, including development proposed on bluffs. Existing policies would continue to be implemented upon review of site-specific development.</p>

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<p>CLUP Policy 3-7: No development shall be permitted on the bluff face, except for engineered staircases or accessways to provide beach access, and pipelines for scientific research or coastal dependent industry. Drainpipes shall be allowed only where no other less environmentally damaging drain system is feasible and the drainpipes are designed and placed to minimize impacts to the bluff face, toe, and beach. Drainage devices extending over the bluff face shall not be permitted if the property can be drained away from the bluff face.</p>	
<p>CLUP Policy 3-8: Applications for grading and building permits, and applications for subdivision shall be reviewed for adjacency to, threats from, and impacts on geologic hazards arising from seismic events, tsunami runup, landslides, beach erosion, or other geologic hazards such as expansive soils and subsidence areas. In areas of known geologic hazards, a geologic report shall be required. Mitigation measures shall be required where necessary.</p> <p>CLUP Policy 3-10: Major structures, i.e., residential, commercial, and industrial, shall be sited a minimum of 50 feet from a potentially active, historically active, or active fault. Greater setbacks may be required if local geologic conditions warrant.</p>	<p>Consistent. Plan Dev Std LU-2 requires sea level rise and coastal hazard analyses for near-shore development, which would address hazards listed in CLUP Policy 3-8. Action TEI-5 requires submittal of detailed drainage and erosion control plans prior to issuance of a permit for private roads or driveways serving residential development. Existing policies would continue to be implemented upon review of site-specific development.</p>
<p>CLUP Policy 3-11: 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.</p> <p>CLUP Policy 3-12: Permitted development shall not cause or contribute to flood hazards or lead to expenditure of public funds for flood control works, i.e., dams, stream channelizations, etc.</p>	<p>Consistent. Policy AG-2.A requires measures for prevention of flooding and sedimentation resulting from urbanization. The Flood Hazard Overlay is a land use and zoning overlay and is depicted on the land use overlay maps of the Plan (Figures 5-1, 5-3, and 5-5) and the land use and overlay maps attached to the CLUP general plan amendment and the Article II Coastal Zoning Ordinance rezone ordinance amendment. Existing policies would continue to be implemented upon review of site-specific development.</p>
<p>CLUP Policy 3-13: 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.</p> <p>CLUP Policy 3-14: All development shall be designed to fit the site topography, soils, geology, hydrology, and</p>	<p>Consistent. The Plan's Natural Resource and Stewardship policies call for a watershed-based approach for land use and development and contain policies intended to minimize environmental impacts of land development. Existing LUE Hillside and Watershed Protection policies would continue to be implemented upon review of site-specific development. Additional Plan policies and actions will also ensure that</p>

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<p>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.</p> <p>CLUP Policy 3-15: For necessary grading operations on hillsides, the smallest practical area of land shall be exposed at any one time during 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.</p> <p>CLUP Policy 3-16: 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</p> <p>CLUP Policy 3-17: 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.</p> <p>CLUP Policy 3-18: 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.</p>	<p>future development be located, designed and constructed in a manner that would ensure consistency with these Hillside and Watershed Protection policies, as provided below.</p> <p>The Plan incorporates a systematic hierarchy of site design and treatment issues to ensure a consistent approach to implementing visual resources protection on the Gaviota Coast. The Site Design Hierarchy establishes a priority ranking of preferred site design components to avoid or lessen visual impacts; siting development to minimize grading as it relates to visual impacts is consistent with policies to minimize grading in general. Policy VIS-2 requires adherence to the Site Design Hierarchy.</p> <p>Policy AG-3.B requires that grading and brush clearing for new agricultural improvements on hillsides shall not cause excessive erosion or downslope damage.</p> <p>Action AG-3 directs the County to prepare steep slopes development standards for agricultural development on slopes of 30 to 40 percent or greater on agriculturally-zoned land. The standards may include preparation of an erosion control plan with best management practices to ensure slope stabilization, soil conservation, and water quality control, preferred land clearing methods, and provisions for reclamation when the operation has been abandoned. To fulfill this requirement, the Gaviota Coast Plan incorporates Steep Slope Guidelines, developed by the Cachuma Resource Conservation District, which are consistent with the requirements of Action AG-3, as Appendix D to the Plan and zoning ordinance amendments require implementation of the guidelines for applicable projects. In the final Plan, Action AG-3 is replaced by new Dev Std AG-3, which requires adherence to the Steep Slope Guidelines on slopes of 30% or greater.</p> <p>Policy REC-5 provides siting and design considerations applicable to future trails siting including a provision that proposed trail alignments avoid areas that are highly geologically unstable or especially prone to erosion.</p> <p>Policy REC-6 provides coastal trail siting and design considerations applicable to future trail siting and provides that vertical beach access should utilize natural topography.</p> <p>Policy LU-4 provides guidelines for development siting of non-agricultural development, including respect for site constraints such as steep slopes.</p> <p>Policy AG-2.A: Prevention of Flooding and Sedimentation, requires measures designed for the</p>

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	<p>prevention of flooding and sedimentation resulting from urbanization, especially as such damage relates to new non-agricultural development.</p> <p>Action TEI-5 is intended to minimize private road and driveway impacts and requires appropriate planting of slopes and submittal of detailed drainage and erosion control plans and requires certification from a qualified engineer that erosion impacts from road construction are adequately mitigated.</p>
<p>CLUP Hillside and Watershed Protection Policy 3-19: Degradation of the water 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.</p>	<p>Consistent. Policy TEI-14 requires minimization of surface and groundwater pollution to the maximum extent practicable. The Plan includes several development standards (Dev Std TEI-2, TEI-6 and TEI-7) that protect surface and ground water quality through compliance with the County’s Local Agency Management Program (LAMP, approved by the Regional Water Quality Control Board) and Chapter 18c of the County Code, which require leach fields to decrease the amount of nitrates filtering through soil to groundwater by requiring specified measures, locate septic systems and other sources of water pollution a minimum of 100 feet from riparian corridors, among requirements. Dev Std TEI-8 prohibits approval of septic systems where impacts to creek water quality would occur. In addition the Plan includes policies and development standards that limit development within stream corridors. Development standard Dev Std NS-2 requires mapped riparian ESH overlay areas to have a development area setback buffer of 100 feet from the edge of either side of top-of-bank of creeks or existing edge of riparian vegetation, whichever is further.</p>
<p>CLUP Policy 3-21: Where agricultural development will involve the construction of service roads and/or the clearance of natural vegetation for orchard development, a brush removal permit shall be required.</p> <p>CLUP Policy 3-22: Where agricultural development will involve the construction of service roads and the clearance of major vegetation for orchard development, cover cropping or any other comparable means of soil protection shall be utilized to minimize erosion until orchards are mature enough to form a vegetative canopy over the exposed earth.</p>	<p>Consistent. The Plan includes various policies intended to ensure that agriculture is conducted in an environmentally sensitive manner including Goal AG-3, Policy AG-3.B, and Policy NS-2. Existing CLUP policies would continue to be implemented upon review of site-specific development.</p> <p>In addition, Steep Slope Guidelines for orchards are incorporated into the Plan as Appendix D and ordinance amendments to the County LUDC and Article II Coastal Zoning Ordinance require compliance of new agricultural cultivation on steep slopes. These guidelines are designed to minimize and reduce erosion impacts associated with agricultural development and orchard expansion on steep slopes.</p>
<p>CLUP Policy 4-2: All commercial, industrial, planned development, and greenhouse projects shall be required</p>	<p>Consistent. The Plan includes a Site Design Hierarchy which provides the framework for siting and design criteria under the visual resource policies. Policy VIS-2</p>

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to submit a landscaping plan to the County for approval.	requires adherence to the Site Design Hierarchy and Gaviota Coast Plan Design Guidelines, which include landscaping requirements to provide visual softening and screening.
<p>CLUP Visual Resource Policy 4-3: In areas designated as rural on the land use plan maps, the height, scale, and design of structures shall be compatible with the character of the surrounding natural environment, except where technical requirements dictate otherwise. Structures shall be subordinate in appearance to natural landforms; shall be designed to follow the natural contours of the landscape; and shall be sited so as not to intrude into the skyline as seen from public viewing places.</p>	<p>Consistent. Plan Policy VIS-2 requires visually subordinate development as seen from public viewing places. Visually subordinate development would be achieved through adherence to the Site Design Hierarchy and Gaviota Coast Plan Design Guidelines. Existing policies would continue to be implemented upon review of site-specific development. Policy VIS-3 requires development avoid intrusion into the skyline and Policy VIS-4 prohibits development from being sited on ridgelines to the maximum extent feasible. The Plan also includes the Critical Viewshed Corridor Overlay that applies to development within primary public views from Highway 101. These requirements further support and enhance LUE Visual Resource Policy #2.</p>
<p>CLUP Visual Resource Policy 4-4: 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.</p> <p>CLUP Visual Resource Policy 4-5: In addition to that required for safety (see Policy 3-4), further bluff setbacks may be required for oceanfront structures to minimize or avoid impacts on public views from the beach. Bluff top structures shall be set back from the bluff edge sufficiently far to insure that the structure does not infringe on views from the beach except in areas where existing structures on both sides of the proposed structure already impact public views from the beach. In such cases, the new structure shall be located no closer to the bluff's edge than the adjacent structures.</p>	<p>Consistent. The Plan includes a Site Design Hierarchy which provides the framework for siting and design criteria under the visual resource policies. Policy VIS-2 requires adherence to the Site Design Hierarchy and Gaviota Coast Plan Design Guidelines, which address site selection, architecture, grading and landscaping to ensure development is compatible with the rural character, natural environment and scale and character of the existing community, and does not adversely affect views.</p>
<p>CLUP Policy 4-6: Signs shall be of size, location, and appearance so as not to detract from scenic areas or views from public roads and other viewing points.</p>	<p>Consistent. The Plan includes Action TEI-1 which encourages Caltrans to prepare Highway 101 Design Guidelines in coordination with the County, Coastal Commission, Santa Barbara County Association of Governments, State Department of Parks and Recreation, and local citizens. Design criteria would address signs and other highway related improvements and would ensure improvements are inconspicuous and are in harmony with the rustic natural setting of the Gaviota Coast.</p>
<p>CLUP Policy 4-7: Utilities, including television, shall be placed underground in new developments in accordance</p>	<p>Consistent. The Site Design Hierarchy and Gaviota Coast Plan Design Guidelines included in the proposed</p>

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with the rules and regulations of the California Public Utilities Commission, except where cost of undergrounding would be so high as to deny service.	Plan require the visibility of utilities to be eliminated or minimized from public viewing places.
<p>CLUP Policy 4-8: The County shall request the State of California to designate that portion of Highway 101 between Winchester Canyon and Gaviota State Park as a “Scenic Highway.”</p>	<p>Consistent. The Gaviota Coast Plan includes Action VIS-3, which directs the County to apply to Caltrans for a scenic highway designation for Highway 101, from the City of Goleta to Highway 1. The County is currently moving forward with an application to Caltrans to designate Highway 101 as a Scenic Highway from the City of Goleta’s western limit to Highway 1.</p>
<p>CLUP Policy 4-9: Structures shall be sited and designed to preserve unobstructed broad views of the ocean from Highway 101, and shall be clustered to the maximum extent feasible.</p> <p>CLUP Policy 4-10: A landscaping plan shall be submitted to the County for approval. Landscaping when mature, shall not impede public views.</p>	<p>Consistent. The Plan includes a Site Design Hierarchy which provides the framework for siting and design criteria under the visual resource policies. Policy VIS-2 requires adherence to the Site Design Hierarchy and Gaviota Coast Plan Design Guidelines, which address site selection, architecture, grading and landscaping to ensure development is compatible with the rural character, natural environment, and does not adversely affect views. The Plan includes additional standards for the highly scenic view corridor along Highway 101 from Goleta to the Gaviota Tunnel via the adoption of the new Critical Viewshed Corridor Overlay. The new overlay provides enhanced protection to ensure that development is sited and/or screened to reduce impacts to the Highway 101 viewshed.</p>
<p>CLUP Policy 4-11: Building height shall not exceed one story or 15 feet above average finished grade, unless an increase in height would facilitate clustering of development and result in greater view protection, or a height in excess of 15 feet would not impact public views to the ocean.</p>	<p>Consistent. Plan Policy VIS-16 establishes a height limit of one story or 15 feet above existing grade for new buildings south of Highway 101 unless an increase would facilitate clustering of development and result in greater view protection, or a height in excess of 15 feet would not impact public views to the ocean.</p>
<p>Policy 7-1: The County shall take all necessary steps to protect and defend the public’s constitutionally guaranteed rights of access to and along the shoreline. At a minimum, County actions shall include:</p> <p>Initiating legal action to acquire easements to beaches and access corridors for which prescriptive rights exist consistent with the availability of staff and funds.</p> <p>Accepting offers of dedication which will increase opportunities for public access and recreation consistent with the County’s ability to assume liability and maintenance costs.</p> <p>Actively seeking other public or private agencies to accept offers of dedications, having them assume liability and maintenance responsibilities, and allowing such agencies to initiate legal action to pursue beach</p>	<p>Consistent. These policies of the CLUP will continue to apply to new coastal development in the Plan Area, and will be implemented upon review of site-specific development. The Plan includes many policies and actions, all of which are focused on improving recreational opportunities in the Plan Area and support and enhance the direction of these policies to protect and defend the public’s right of access to and along the shore and obtain both vertical and lateral access to and along the beach. Of note and relevant to these policies are Policies REC-1 through REC-4, REC-7 through REC-10, and REC-19, and Dev Std REC-1.</p>

Policy Requirement	Discussion
<p>access.</p> <p>Policy 7-2: For all development between the first public road and the ocean granting of an easement to allow vertical access to the mean high tide line shall be mandatory unless:</p> <p>Another more suitable public access corridor is available or proposed by the land use plan within a reasonable distance of the site measured along the shoreline, or</p> <p>Access at the site would result in unmitigable adverse impacts on areas designated as “Habitat Areas” by the land use plan, or</p> <p>Findings are made, consistent with Section 30212 of the Act, that access is inconsistent with public safety, military security needs, or that agriculture would be adversely affected, or</p> <p>The parcel is too narrow to allow for an adequate vertical access corridor without adversely affecting the privacy of the property owner. In no case, however, shall development interfere with the public’s right of access to the sea where acquired through use unless an equivalent access to the same beach area is guaranteed.</p> <p>The County may also require the applicant to improve the access corridor and provide bike racks, signs, parking, etc.</p> <p>CLUP Policy 7-3: For all new development between the first public road and the ocean, granting of lateral easements to allow for public access along the shoreline shall be mandatory. In coastal areas, where the bluffs exceed five feet in height, all beach seaward of the base of the bluff shall be dedicated. ...</p>	
<p>CLUP Policy 7-5: For areas controlled by Federal, State, County, or District agencies, in a zone extending approximately 250 feet inland from the mean high tide line, priority shall be given to coastal dependent and related recreational activities and support facilities. However, camping facilities should be set back from the beach and bluffs and near-shore areas reserved for day use activities. Recreational activities that are not coastal dependent may be located within this 250-foot zone if the less desirable coastal dependent support facilities (parking, restrooms, etc.) are located inland. ...</p> <p>CLUP Policy 7-6: Recreational uses on oceanfront lands, both public and private, that do not require extensive alteration of the natural environment (i.e., tent campgrounds) shall have priority over uses requiring substantial alteration (i.e., recreational vehicle</p>	<p>Consistent. The Plan includes policies that prioritize recreational uses and locations as directed by Policies 7-5 and 7-6. For example, just a few of the many Plan policies include the following. Policy REC-6 directs parking be located as close as possible to Highway 101. Policy REC-7 states the California Coastal Trail should be sited as close to the ocean as possible. Policy REC-15 directs siting of campgrounds as far from the beach as feasible to reserve near-shore areas for day use while Policy REC-18 directs future campground development prioritize low intensity camping rather than additional recreational vehicle facilities.</p>

Policy Requirement	Discussion
campgrounds).	
<p>CLUP Policy 7-13: In order to protect natural and visual resources of the coastal zone between Ellwood and Gaviota, development of recreational facilities shall not impede views between U.S. 101 and the ocean, shall minimize grading, removal of vegetation, and paving, and be compatible with the rural character of the area. Existing natural features shall remain undisturbed to the maximum extent possible, and landscaping shall consist of drought-tolerant species.</p>	<p>Consistent. Plan Policy REC-15 replaces 7-13 and has been adapted to require conformance with the Plan’s visual resource policies and minimize grading, removal of vegetation, and paving, and shall be compatible with the rural character of the area. Existing natural features shall remain undisturbed to the maximum extent possible, and landscaping shall consist of native drought-tolerant species.</p>
<p>CLUP Policy 7-14: Campgrounds and ancillary facilities sited south of U.S. 101 between Ellwood and Gaviota shall be set back as far as feasible from the beach in order to reserve near-shore areas for day use. Where feasible, new recreational facility development, particularly campgrounds and parking lots, shall be located north of U.S. 101.</p>	<p>Consistent. Plan Policy REC-16a replaces 7-14 with only a minor adaptation to allow trailhead parking lots south of U.S. Highway 101.</p>
<p>CLUP Policy 7-15: The vegetation in the small canyons at the mouths of Canada San Onofre and Canada del Molino streams shall not be disturbed by recreational development or use.</p>	<p>Consistent. Plan Policy REC-16b replaces 7-15 without any changes.</p>
<p>CLUP Policy 7-16: All new development on State-owned lands shall be in conformance with a recreational master plan approved by the County and the Coastal Commission. The master plan shall include maps showing locations of proposed facilities and a text describing the entire scope of the State’s long-range plans for the Ellwood to Gaviota area, i.e., numbers of campsites, restrooms, parking lots, kinds of recreational activities to be accommodated, etc. In addition, the master plan shall conform to the following criteria:</p> <p>Facilities for overnight use by out-of-County visitors shall be balanced with those for day use by local residents.</p> <p>Intensities and kinds of recreational uses shall be controlled so as not to exceed the environmental carrying capacity of the area.</p> <p>Alternative transportation systems to provide access to State parks (i.e., shuttle buses) shall be used where feasible.</p>	<p>Consistent. Plan Policy REC-17 replaces 7-16 with only minor, non-substantive changes.</p>
<p>CLUP Policy 7-17: Since existing parks in the Ellwood to Gaviota area already provide extensive facilities for recreational vehicle camping, priority in future development shall be for campgrounds that would be accessible by bicycle and pedestrian trails only and for</p>	<p>Consistent. Plan Policy REC-18 replaces 7-17 with only minor, non-substantive changes.</p>

Policy Requirement	Discussion
hostels.	
<p>CLUP Policy 7-18: Expanded opportunities for access and recreation shall be provided in the Gaviota Coast planning area. ...</p>	<p>Consistent. Plan Policy REC-19 replaces 7-18 with only minor, changes including the removal of references outside of the Plan Area (such as Haskell’s Beach, which is now located in the City of Goleta), and addition of new locations for maximizing access within the Plan Area.</p>
<p>CLUP Policy 7-19: In order to protect the marine resources of Naples Reef and the adjacent beach as a hauling out area for harbor seals, intensive recreational use shall not be encouraged. Access to the site should continue to be by way of boats.</p>	<p>Consistent. Plan Policy REC-20 replaces 7-19 without any changes.</p>
<p>CLUP Policy 7-21: Jalama Road shall be maintained as a two-lane road with only minor realignment from the summit to the park. All improvements shall be designed and constructed to minimize adverse impacts on Jalama Creek. Improvements shall result in a minimum removal of any riparian vegetation along the creek.</p>	<p>Consistent. Plan Policy TEI-8 replaces 7-21 without any changes.</p>
<p>CLUP Policy 7-25: Easements for trails shall be required as a condition of project approval for that portion of the trail crossing the parcel upon which the project is proposed.</p>	<p>Consistent. Plan Dev Std REC-1 requires dedication of a lateral and/or vertical accessway, as a condition of development, where a nexus and rough proportionality exist between impacts of proposed development and provision of public access.</p> <p>Policy REC-1 provides additional opportunities for public trails and open space on both public and private lands. Policy REC-3 provides that public trails, access, and recreational opportunities shall be pursued as they arise on: 1) public lands, 2) private lands of willing landowners, and 3) lands exacted as a result of the discretionary development process or eminent domain, subject to state and federal law.</p> <p>Policy REC-2 promotes expansion of trails and requires that for all pending private and public development projects with planned or existing recreational uses, the County shall fully explore options for new trails, coastal access and parking, and ways to promote their acquisition and development through the environmental and planning review processes.</p>
<p>CLUP Policy 7-26: All proposed trails for the coastal zone shall be incorporated into the County’s Master Plans for hiking, biking, and equestrian trails.</p>	<p>Consistent. The Plan includes a Parks, Recreation, and Trails (PRT) map that depicts all existing and proposed locations of coastal access points and trails, including the California Coastal Trail.</p>
<p>CLUP Policy 8-1: An agricultural land use designation shall be given to any parcel in rural areas that meets one</p>	<p>Consistent. The Plan designates a majority of the Plan Area with an agricultural land use designation except for</p>

Policy Requirement	Discussion
<p>or more of the following criteria:</p> <p>Prime agricultural soils (Capability Classes I and II as determined by the U.S. Soil Conservation Service).</p> <p>Other prime agricultural lands as defined in Section 51201 of the Public Resources Code (Appendix A).</p> <p>Lands in existing agricultural use.</p> <p>Lands with agricultural potential (e.g., soil, topography, and location that will support long term agricultural use).</p>	<p>Federal and State Park lands, conserved lands, and other areas with existing development such as rural residential, coastal dependent industry, transportation corridor, etc.). The Naples Townsite designation is retained to recognize historic development rights.</p>
<p>CLUP Policy 8-2: If a parcel is designated for agricultural use and is located in a rural area not contiguous with the urban/rural boundary, conversion to non-agricultural use shall not be permitted unless such conversion of the entire parcel would allow for another priority use under the Coastal Act, ...</p>	<p>Consistent. In the Coastal Zone, the Plan does not change any land use designations from agriculture to any other uses except for the Arroyo Hondo Preserve (to Resource Management) and small portions of State Park owned land south of Highway 101 near Refugio Road (to Recreation). Plan policies would not result in conversion of an agricultural use to non-agricultural use. This policy would continue to be implemented upon review of site-specific development.</p>
<p>CLUP Policy 8-5: All greenhouse projects of 20,000 or more square feet and all additions to existing greenhouse development, i.e., greenhouse expansion, packing sheds, or other development for a total of existing and additions of 20,000 or more square feet, shall be subject to County discretionary approval and, therefore, subject to environmental review under County CEQA guidelines.</p>	<p>Consistent. This policy would continue to be implemented upon review of site-specific development. The Plan includes the Critical Viewshed Corridor Overlay for property within the primary viewshed of Highway 101. Within the Critical Viewshed Corridor Overlay greenhouse development would be limited to 4,000 square feet per parcel.</p>
<p>CLUP Policy 8-8: The existing and future viability of large, non-prime agricultural operations of 10,000 acres or more for which the County of Santa Barbara has not approved land divisions in the Gaviota Coast and North Coast Planning Areas shall be protected. In order to preserve non-prime agricultural operations and avoid subdivision of large ranches down to the minimum parcel sizes specified in the land use plan, residential development at a density greater than that allowed under the specified minimum parcel size may be permitted only if clustered on no more than two percent of the gross acreage with the remaining acreage to be left in agricultural production and/or open space. The maximum density allowable under a clustered residential development shall be calculated at the rate of one dwelling unit per two acres for each acre included in the two percent area. Residential development to exceed one dwelling unit (du) per two acres in the two percent area up to a maximum of one du per acre may be permitted, provided that the County can make the finding that there is no potential for significant adverse environmental effects with respect to the findings listed below. An additional one percent of the gross area shall be</p>	<p>Not Applicable: Plan Action LU-8 deletes CLUP Policy 8-8 and its companion Agriculture Residential Cluster (ARC) Overlay Zone in Article II, Section 35-99.</p> <p>In lieu of CLUP Policy 8-8 and the ARC Overlay Zone the Plan includes Action LU-3, which provides direction for a future Rural Clustering Ordinance including incentives to encourage clustering of development to balance potential development rights with important coastal and inland land use issues.</p> <p>A policy consistency determination to delete CLUP Policy 8-8 is not applicable since this represents a policy choice by the Board of Supervisors to develop a rural clustering tool appropriate for the Gaviota Coast Plan area. The ARC Overlay and Policy 8-8 has been in existence since the Santa Barbara County Local Coastal Program was certified in 1982. While the ARC Overlay is a voluntary tool a landowner could pursue, there has never been a development application request to apply the overlay since its inception more than 40 years ago. Since the LCP was certified, the County has adopted additional tools for the protection of agricultural resources including the County of Santa Barbara</p>

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<p>dedicated for public recreation and reserved for commercial visitor-serving uses. Such developments may be considered subject to the following findings which shall be based on data contained in an Environmental Impact Report on each project.</p>	<p>Environmental Thresholds and Guidelines Manual, Agricultural Resource Guidelines. The Agricultural Resource Guidelines are applicable during the CEQA environmental review process, and establish an agricultural viability threshold to assess impacts associated with parcelization of agricultural lands.</p>
<p>CLUP Policy 9-1: Prior to the issuance of a development permit, all projects on parcels shown on the land use plan and/or resource maps with a Habitat Area overlay designation or within 250 feet of such designation or projects affecting an environmentally sensitive habitat area shall be found to be in conformity with the applicable habitat protection policies of the land use plan. All development plans, grading plans, etc., shall show the precise location of the habitat(s) potentially affected by the proposed project. Projects which could adversely impact an environmentally sensitive habitat area may be subject to a site inspection by a qualified biologist to be selected jointly by the County and the applicant.</p>	<p>Consistent. This policy would continue to be implemented upon review of site-specific development. Plan Policy NS-4 establishes criteria for ESH habitat designation and designates identified habitats as ESH.</p>
<p>CLUP Policy 9-2: Because of their State-wide significance, coastal dune habitats shall be preserved and protected ...</p> <p>CLUP Policy 9-3: All non-authorized motor vehicles shall be banned from beach and dune areas.</p> <p>CLUP Policy 9-4: All permitted industrial and recreational uses shall be regulated both during construction and operation to protect critical bird habitats during breeding and nesting seasons. ...</p> <p>CLUP Policy 9-5: For all permitted uses, including recreation, foot traffic on vegetated dunes shall be minimized. ...</p>	<p>Consistent. These policies would continue to be implemented upon review of site-specific development. Plan Policy NS-4 identifies dunes as ESH.</p>
<p>CLUP Policy 9-6: All diking, dredging, and filling activities shall conform to the provisions of Sections 30233 and 30607.1 of the Coastal Act. ...</p> <p>CLUP Policy 9-7: Dredge spoils shall not be deposited permanently in areas subject to tidal influence or in areas where public access would be significantly adversely affected. ...</p> <p>CLUP Policy 9-8: Boating shall be prohibited in all wetland areas except for research or maintenance purposes.</p> <p>CLUP Policy 9-9: A buffer strip, a minimum of 100 feet in width, shall be maintained in natural condition along the periphery of all wetlands. ...</p>	<p>Consistent. These policies would continue to be implemented upon review of site-specific development. Plan Policy NS-4 identifies wetlands as ESH. Dev Std NS-2 (COASTAL) establishes a minimum buffer of 100 feet from wetlands, consistent with Policy 9-9.</p>

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<p>CLUP Policy 9-10: Light recreation such as birdwatching or nature study and scientific and educational uses shall be permitted with appropriate controls to prevent adverse impacts.</p> <p>CLUP Policy 9-11: Wastewater shall not be discharged into any wetland without a permit from the Regional Water Quality Control Board finding that such discharge improves the quality of the receiving water.</p> <p>CLUP Policy 9-12: Wetland sandbars may be dredged, when permitted pursuant to Policy 9-6 above, ...</p> <p>CLUP Policy 9-13: No unauthorized vehicle traffic shall be permitted in wetlands and pedestrian traffic shall be regulated and incidental to the permitted uses.</p> <p>CLUP Policy 9-14: New development adjacent to or in close proximity to wetlands shall be compatible with the continuance of the habitat area and shall not result in a reduction in the biological productivity or water quality of the wetland due to runoff (carrying additional sediment or contaminants), noise, thermal pollution, or other disturbances.</p> <p>CLUP Policy 9-15: Mosquito abatement practices shall be limited to the minimum necessary to protect health and prevent damage to natural resources. ...</p> <p>CLUP Policy 9-16a: No grazing or other agricultural uses shall be permitted in coastal wetlands.</p>	
<p>CLUP Policy 9-18: Development shall be sited and designed to protect native grassland areas.</p> <p>CLUP Policy 9-21: Development shall be sited and designed to avoid vernal pool sites as depicted on the resource maps.</p> <p>CLUP Policy 9-22: Butterfly trees shall not be removed except where they pose a serious threat to life or property, and shall not be pruned during roosting and nesting season.</p> <p>CLUP Policy 9-23: Adjacent development shall be set back a minimum of 50 feet from the trees.</p>	<p>Consistent. Plan Policy NS-4 identifies native grasslands and butterfly trees as ESH. Dev Std NS-2 (COASTAL) establishes a minimum buffer of 100 feet from wetlands, consistent with Policy 9-23. The development contemplated in the proposed Plan would be subject to CLUP Policies 9-18 and 9-21 through 9-23. Site-specific review of development proposals would be required to be consistent with these policies and these policies would continue to be implemented upon review of site-specific development.</p>
<p>CLUP Policy 9-24: Recreational activities near or on areas used for marine mammal hauling grounds shall be carefully monitored to ensure continued viability of these habitats.</p> <p>CLUP Policy 9-25: Marine mammal rookeries shall not be altered or disturbed by recreational, industrial, or any other uses during the times of the year when such areas are in use for reproductive activities, i.e., mating,</p>	<p>Consistent. Plan Policy NS-4 identifies marine mammal haulouts as ESH. Policy NS-20 discourages intensive recreational uses near Naples Reef and the nearby hauling ground. These policies would continue to be implemented upon review of site-specific development.</p>

Policy Requirement	Discussion
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<p>CLUP Policies 9-33: Naples reef shall be maintained primarily as a site for scientific research and education. Recreational and commercial uses shall be permitted as long as such uses do not result in depletion of marine resources. If evidence of depletion is found, the County shall work with the Department of Fish and Game and sport and commercial fishing groups to assess the extent of damage and implement mitigating measures.</p>	<p>Consistent: The Plan includes Policy REC-20 which intends to protect the marine resources of Naples Reef and the adjacent beach as a hauling out area for harbor seals by not encouraging intensive recreational uses. This policy would continue to be implemented upon review of site-specific development.</p>
<p>CLUP Policy 9-35: Oak trees shall be protected during land use activities, including cultivated agriculture and grazing. Regeneration of oak trees on grazing lands should be encouraged.</p> <p>CLUP Policy 9-36: When sites are graded or developed, areas with significant amounts of native vegetation shall be preserved. All development shall be sited, designed, and constructed to minimize impacts of grading, paving, construction of roads or structures, runoff, and erosion on native vegetation. In particular, grading and paving shall not adversely affect root zone aeration and stability of native trees.</p>	<p>Consistent. The Plan includes Policy NS-2, which protects biological and natural resources to the maximum extent feasible. In addition, Policy NS-4 establishes criteria for ESH habitat designation and includes coast live oak, Valley oak woodlands and other rare native plant communities and vegetation. Policy LU-4 requires siting of non-agricultural development to be scaled, sited, and designed to reduce impacts to resources such as environmentally sensitive habitat.</p>
<p>CLUP Policy 9-37: 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:</p> <ul style="list-style-type: none"> soil type and stability of stream corridors; how surface water filters into the ground; slope of the land on either side of the stream; and location of the 100-year flood plain boundary. <p>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.</p> <p>CLUP Policy 9-38: No structures shall be located within the stream corridor except: public trails, dams for necessary water supply projects, flood control projects where no other method for protecting existing structures</p>	<p>Consistent. CLUP Policies 9-37 through 9-43 would continue to be implemented upon review of site-specific development. However, the Plan includes policies that supplement these policies and enhance protection of streams and riparian ESH. First, Policy NS-4 identifies streams and riparian habitats as ESH. Dev Std NS-2 (COASTAL) establishes a buffer of 100 feet but allows the buffer to be adjusted upward or downward case-by-case, relying upon the same criteria but also requiring a demonstration of net environmental benefit and findings of consistency with the Gaviota Coast Plan and the CLUP. Policy NS-7 requires that riparian vegetation shall be protected to the maximum extent feasible and prohibits its removal except where clearing is necessary for the maintenance of existing roads and/or free flowing channel conditions, the removal of invasive exotic species, stream/creek restoration, or the provision of essential public services. The policy also directs that any necessary removal be conducted in compliance with ESH protection policies and provisions. Policy NS-9 supports natural stream channels and conditions to be maintained in an undisturbed state to the maximum extent feasible in order to protect banks from erosion, enhance wildlife passage, and provide natural greenbelts. As noted in Policy LU-1, the policies most protective of coastal resources would take precedence and ensure consistency with the CLUP.</p>

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<p>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.</p> <p>CLUP Policy 9-39: Dams or other structures that would prevent upstream migration of anadromous fish shall not be allowed in streams targeted by the California Department of Fish and Game unless other measures are used to allow fish to bypass obstacles. These streams include: San Antonio Creek (Los Alamos area), Santa Ynez River, Jalama Creek, Santa Anita Creek, Gaviota Creek, and Tecolote Creek.</p> <p>CLUP Policy 9-40: All development, including dredging, filling, and grading within stream corridors, shall be limited to activities necessary for the construction of uses specified in Policy 9-38. When such activities require removal of riparian plant species, revegetation with local native plants shall be required except where undesirable for flood control purposes. Minor clearing of vegetation for hiking, biking, and equestrian trails shall be permitted.</p> <p>CLUP Policy 9-41: All permitted construction and grading within stream corridors shall be carried out in such a manner as to minimize impacts from increased runoff, sedimentation, biochemical degradation, or thermal pollution.</p> <p>CLUP Policy 9-42: The following activities shall be prohibited within stream corridors: cultivated agriculture, pesticide applications, except by a mosquito abatement or flood control district, and installation of septic tanks.</p> <p>CLUP Policy 9-43: Other than projects that are currently approved and/or funded, no further concrete channelization or other major alterations of streams in the coastal zone shall be permitted unless consistent with the provisions of Section 30236 of the Coastal Act.</p>	
<p>CLUP Policy 10-1: All available measures, including purchase, tax relief, purchase of development rights, etc., shall be explored to avoid development on significant historic, prehistoric, archaeological, and other classes of cultural sites.</p> <p>CLUP Policy 10-2: When developments are proposed for parcels where archaeological or other cultural sites</p>	<p>Consistent. The Plan includes a policy framework (cultural resource stewardship policies) to preserve significant cultural, archaeological, and historical resources to the maximum extent feasible. Of note, the Plan includes policies that address the importance of cultural resources and the need for avoidance, protection, or other mitigation (Policies CS-1 and CS-2), and require preparation of archaeological surveys and</p>

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<p>are located, project design shall be required which avoids impacts to such cultural sites if possible.</p> <p>CLUP Policy 10-3: When sufficient planning flexibility does not permit avoiding construction on archaeological or other types of cultural sites, adequate mitigation shall be required. Mitigation shall be designed in accord with guidelines of the State Office of Historic Preservation and the State of California Native American Heritage Commission.</p> <p>CLUP Policy 10-4: Off-road vehicle use, unauthorized collecting of artifacts, and other activities other than development which could destroy or damage archaeological or cultural sites shall be prohibited.</p>	<p>studies (Dev Stds CS-1 and CS-2). Implementing actions and development standards support Native American (government-to-government) consultation (Action CS-4), tribal access (Action CS-6), and protecting the confidentiality of traditional cultural, historical, and spiritual areas (Action CS-5). The Plan policy framework supports and helps to implement compliance with the Historic and Archaeological Sites policies, which will continue to apply after adoption of the Plan.</p>
<p>CLUP Policy 10-5: Native Americans shall be consulted when development proposals are submitted which impact significant archaeological or cultural sites.</p>	<p>Consistent. The Plan includes Action CS-4 which requires the County to continue its Native American (government-to-government) consultations with the tribes identified by the Native American Heritage Commission (NAHC) pursuant to AB 52 and SB 18 to ensure that traditional resources of concern to the Chumash are identified and taken into account in future development planning. Dev Stds CS-3 and CS-4 similarly require consultation with Native Americans when development proposals could impact significant archaeological or cultural sites and requires consultation with Chumash during each stage of cultural resources review.</p>
Energy Element	
<p>Energy Element Policy 3.1: Enhance opportunities for alternative transportation.</p> <p>Energy Element Policy 3.5: The County shall consider the completion of an integrated bikeway system, linking residences with commercial centers, work locations, schools, parks and mass transit facilities to be a high priority for promoting the use of the bicycle as an alternative mode of transportation.</p>	<p>Consistent. The Plan Area is rural without a significant commuting population. However, the Plan includes Action REC-5 to work with California State Parks and the California Coastal Commission to reopen the closed segment of the existing Class I bikeway that links El Capitan and Refugio State Beaches. In addition, Policy TEI-3 encourages safety enhancements of the Pacific Coast Bike Route by: (1) establishing paths, completely separated from roadways, for the exclusive use of bicycles with cross flow by motorists minimized; (2) connecting existing bicycle paths, including linkages to and between communities and recreation areas; and (3) allowing for flexible, site specific design and routing to minimize impacts on adjacent development and fragile habitat.</p>
<p>Energy Element Goal 4: Water Use and Solid Waste: Increase the efficiency of water and resource use to reduce energy consumption associated with various phases of using resources (pumping, distribution,</p>	<p>Consistent. The proposed Plan includes Policy TEI-16 regarding the Tajiguas Landfill which requires the County to pursue additional resource recovery projects/programs prior to, or concurrent with, any plan to expand municipal solid waste disposal capacity</p>

Policy Requirement	Discussion
treatment, heating, etc.).	through landfilling. In addition, the proposed Plan includes Action TEI-8, which states that the County should consider adopting the State updates to Title 24, Part 5, Chapter 16A, Part I – Non-potable Water Reuse Systems and Action TEI-9 which states the County should consider alternative waste disposal and water conservation systems.
Circulation Element	
<p>Circulation Element Policy A. 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 or 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.</p>	<p>Consistent. The proposed Plan does not include update roadway classifications, intersection levels of service, or capacity levels. As a result, the standards of the Circulation Element would continue to apply within the Plan Area.</p>
<p>Circulation Element Policy B. Individual community and area plans adopted subsequent to this Element shall strive to achieve a balance between designated land uses and roadway and intersection capacity. These community and area plans shall identify areas where increased traffic may create noise levels that could potentially exceed the policies and standards of the Noise Element of the Comprehensive Plan and to the extent feasible, include policies, land use changes and other mitigations to reduce these impacts to insignificance.</p>	<p>Consistent. Traffic noise levels associated with the proposed Plan land use changes would be negligible, as the Plan Area does not accommodate a significant population and would not result in significant impacts from traffic noise, as specified in Section 4.10.3.2.</p>
<p>Circulation Element Policy C. The County shall continue to develop programs that encourage the use of alternative modes of transportation, including, but not limited to, an updated bicycle route plan, park and ride facilities, and transportation demand management ordinances.</p>	<p>Consistent. The proposed Plan would encourage construction of additional bicycle routes within the Plan Area. Under Action REC-7, the County would work with California State Parks and the California Coastal Commission to reopen the closed segment of the existing Class I bikeway that links El Capitan and Refugio State Beaches. Policy TEI-3 would encourage safety enhancements of the Pacific Coast Bike Route.</p>
<p>Circulation Element Policy E. 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.</p>	<p>Consistent. Future discretionary projects within the Plan Area would be subject to the Circulation Element standards and policies and the LUE’s Land Use Development Policy #4 with regard to roadway and intersection capacity.</p>
Environmental Resources Management Element	
<p>ERME is a compendium and synthesis of the Seismic</p>	<p>Consistent. The proposed Plan includes policies</p>

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<p>Safety and Safety, Conservation, Open Space, and Scenic Highways Elements and identifies specific factors that mitigate against urban development, such as prime agricultural lands, steep slopes, biological habitat areas, floodplains and floodways, and geologic hazards.</p>	<p>standards to maximize compatibility with open space, agricultural resources and biological resources, and to protect agricultural lands, steep slopes, floodplains, floodways, and geologic hazards. These include Policies LU-3 through LU-5, LU-7, LU-10, and LU-11; Dev Stds LU-1, LU-2, and LU-4; all of the agricultural goals and policies, Action AG-3, and Dev Std AG-3; and all of the natural resources stewardship policies, actions and development standards. In addition, floodways and floodways are mapped on the land use and overlay maps and the LUDC and Article II Coastal Zoning Ordinances include regulations under the Flood Hazard Overlay. There are no urban areas within the Plan Area.</p>
Conservation Element	
<p>The Conservation Element contains numerous recommendations relating to various topics, including water resources, ecological systems, mineral resources, agricultural resources, historic sites, archaeological sites, and conservation and energy. The recommendations in the text of this Element relating to ecological systems and water resources are addressed in this discussion. Recommendations of this Element related to other subjects listed above are not cited, as policy consistency is addressed in other elements of the Comprehensive Plan.</p> <p>Stream Buffers: All streams of the County are delicate habitats because even a cursory survey indicates that their character is changed greatly, generally to a less desirable condition, by any development of the riparian land. We estimate that as little as 100 feet on either side of a stream could provide a good deal of protection to the stream, although this width would have to be increased where the slope of the land is significant. The discussion of stream setbacks also states that within the buffer strips, communities of native vegetation should be kept intact and no pesticide usage should occur on the buffer strips.</p>	<p>Consistent. The Plan includes various Natural Resources Stewardship Policies, Actions, and Development Standards that would protect natural and cultural resources of the Gaviota Coast, including environmentally sensitive habitat (Policies NS-2, NS-4, NS-11 and Dev Std NS-2), wetlands (Policy NS-5), wildlife corridors (Policy NS-6, Action NS-2, Dev Std NS-1), riparian vegetation (Policy NS-7, Action NS-3), and natural stream channels (Policy NS-9). The proposed Plan also promotes watershed protection and restoration of habitat (Policies NS-1, NS-3, NS-8, NS-11 and Actions NS-1, NS-4, NS-5). Policies CS-1 through CS-3, Actions CS-1 through CS-6 and Dev Stds CS-1 through CS-6</p>
Noise Element	
<p>Noise 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.</p> <p>Noise Policy #4: Residential use should be avoided within the 65 dB CNEL contour of any airport and under airport traffic patterns.</p>	<p>Consistent. The Plan Area includes areas located along Highway 101 and the Union Pacific Railroad that could exceed the maximum noise level allowed for sensitive land uses. However, the Plan would not increase development potential in these areas and any future discretionary development would be subject to County noise policies including the Noise Element and Noise Ordinance. Future residential development adjacent to Highway 101 and the Union Pacific Railroad would</p>

Policy Requirement	Discussion
	continue to be subject to these policies. The Plan Area is not located near an airport or under any airport traffic patterns.
Housing Element	
<p>Housing Element Goal I: Enhance the Affordability, Diversity, Quantity, and Quality of the Housing Supply.</p> <p>Housing Element Policy 1.1: Promote new housing opportunities adjacent to employment centers and the revitalization of existing housing to meet the needs of all economic segments of the community, including extremely low-income households, while bolstering the County’s rural heritage and supporting each unincorporated community’s unique character.</p> <p>Housing Element Goal 2: Promote, Encourage, and Facilitate Housing for Special Needs Groups</p> <p>Housing Element Program 2.4: Farmworker Housing. The County shall continue to evaluate and approve as appropriate applications from agricultural operators, housing authorities, non-profit organizations, and other housing developers for funds to supplement funds from federal, state, and local funding sources for farmworker housing projects. Past and/or potential funding sources for farmworker housing projects include County Housing Trust Funds (in-lieu fees collected through the County Inclusionary Housing Ordinance), County Successor Agency (repayments from past loans by the former County of Santa Barbara Redevelopment Agency in Isla Vista), and HOME Investment Partnerships (U.S. Department of Housing and Urban Development, administered by the County of Santa Barbara, Community Services Department, Housing and Community Development Division). In addition, the County shall continue to evaluate and revise as appropriate permit process procedures which streamline the permit process for farmworker housing. The County shall also provide opportunities for stakeholder input from growers, ranch owners, and other agricultural operators regarding the need and opportunities for additional farmworker housing.</p>	<p>Consistent. The proposed Plan provides for a range of housing types appropriate to a rural area, including farm employee dwellings. Higher urban densities are not proposed by the Plan, nor appropriate given the area’s rural character and substantial constraints, including high fire hazards in the area and policies prioritizing the preservation of agriculture.</p>
Agricultural Element	
<p>Agricultural Element Goal I: The County shall ensure and enhance the continuation of agriculture as a major viable production industry in the County. Agriculture shall be encouraged. Where conditions allow (taking into account environmental impacts) expansion and</p>	<p>Consistent. The Plan includes an equivalent goal. Goal AG-1.A states, “Santa Barbara County shall protect and enhance the vitality of agricultural operations and resources as part of a major viable production industry. Where conditions allow, taking into account environmental impacts, expansion and intensification</p>

Policy Requirement	Discussion
Intensification shall be supported.	shall be supported.”
<p>Agricultural Element Policy I.A: The integrity of agricultural operations shall not be violated by recreational or other non-compatible uses.</p> <p>Imposition of any condition requiring an offer of dedication of a recreational trail or other recreational easement shall be discretionary (determined on a case-by-case basis), and in exercising its discretion, the County shall consider the impact of such an easement upon agricultural production of all lands affected by and adjacent to said trail or other easement.</p>	<p>Consistent. The Plan includes Policy AG-I.A, which states that land designated for agriculture shall be preserved and protected for agricultural use and the integrity of agricultural operations shall not be violated by non-compatible uses. Policy AG-1.D.1 would ensure trails are sited to minimize the impacts to prime soils, agricultural operations, public safety, and environmentally sensitive areas. Policy AG-1.D states that requirements for trail dedications shall be made on a case-by-case basis and shall consider the impact of such an easement upon agricultural production of all lands affected by and adjacent to said trail or other easement.</p>
<p>Agricultural Element Policy I.B. The County shall recognize the rights of operation, freedom of choice as to the methods of cultivation, choice of crops or types of livestock, rotation of crops and all other functions within the traditional scope of agricultural management decisions. These rights and freedoms shall be conducted in a manner which is consistent with: (1) sound agricultural practices that promote the long-term viability of agriculture and (2) applicable resource protection policies and regulations.</p>	<p>Consistent. The Plan includes the equivalent Policy AG-1.E.</p>
<p>Agricultural Element Policy I.C. To increase agricultural productivity, the County shall encourage land improvement programs.</p>	<p>Consistent. The Plan includes the equivalent Policy AG-1.H.</p>
<p>Agricultural Element Policy I.D. The use of the Williamson Act (Agricultural Preserve Program) shall be strongly encouraged and supported. The County shall also explore and support other agricultural land protection programs.</p>	<p>Consistent. The Plan includes the equivalent Policy AG-1.I.</p>
<p>Agricultural Element Policy I.E. The County shall recognize that the generation of noise, smoke, odor, and dust is a natural consequence of the normal agricultural practices provided that agriculturalists exercise reasonable measures to minimize such effects.</p>	<p>Consistent. The Plan includes Dev Std AG-2, which requires a Notice to Property Owner, consistent with the County’s adopted Right to Farm Ordinance which provides notice that any inconvenience or discomfort from properly conducted agricultural operations shall be allowed consistent with the intent of the Right to Farm Ordinance. The Plan also includes Policy AG-1.E, which recognizes the rights of operation, freedom of choice as to the methods of cultivation, choice of crops or types of livestock, rotation of crops and all other functions within the traditional scope of agricultural management decisions.</p>
<p>Agricultural Element Policy I.F: The quality and availability of water, air, and soil resources shall be protected through provisions including but not limited to,</p>	<p>Consistent. The Plan includes the equivalent Policy AG-1.J.</p>

Policy Requirement	Discussion
the stability of Urban/Rural Boundary Lines, maintenance of buffer areas around agricultural areas, and the promotion of conservation practices.	
Agricultural Element Policy I.G. Sustainable agricultural practices on agriculturally designated land should be encouraged in order to preserve the long-term health and viability of the soil.	Consistent. The Plan includes the equivalent Policy AG-1.K.
Agricultural Element Goal II: Agricultural lands shall be protected from adverse urban influence.	Consistent. The Plan includes the equivalent Goal AG-2.
Agricultural Element Policy II.A: The County shall require measures designed for the prevention of flooding and silting from urbanization, especially as such damage relates to approved development.	Consistent. The Plan includes the equivalent Policy AG-2.A.
Agricultural Element Policy II.B. Santa Barbara County shall recognize, and give high priority to, the need for protection from trespass, thievery, vandalism, roaming dogs, etc., on all agricultural lands.	Consistent. The Plan includes the equivalent Policy AG-2.B.
Agricultural Element Policy II.C. Santa Barbara County shall discourage the extension by the Local Agency Formation Commission (LAFCO) of urban spheres of influence into productive agricultural lands designated Agriculture II (A-II) or Commercial Agriculture (AC) under the Comprehensive Plan.	Consistent. The Plan includes the equivalent Policy AG-2.C.
<p>Agricultural Element Policy II.D: Conversion of highly productive agricultural lands whether urban or rural, shall be discouraged. The County shall support programs which encourage the retention of highly productive agricultural lands.</p> <p>Agricultural Element Goal III: Where it is necessary for agricultural lands to be converted to other uses, this use shall not interfere with remaining agricultural operations</p> <p>Agricultural Element Policy III.A: Expansion of urban development into active agricultural areas outside of urban limits is to be discouraged, as long as infill development is available.</p>	Consistent. The Plan includes Policy AG-1.C, which requires the County to develop and promote programs to preserve agriculture in the Plan Area. Policy AG-1.A would protect land designated for agriculture for agricultural use and ensure the integrity of agricultural operations is not violated by non-compatible uses. Policy AG-1.B requires the County to protect agricultural land, to the extent feasible, for continued agricultural uses would discourage conversions or other uses that are incompatible with long-term agricultural production.
Agricultural Element Goal IV. Recognizing that agriculture can enhance and protect natural resources, agricultural operations should be encouraged to incorporate such techniques as soil conservation and sound fire risk reduction practices.	Consistent. The Plan includes the equivalent Goal AG-3.
Agricultural Element Policy IV.A. Major wildfires cause severe erosion, property damage, and safety hazards. The County shall encourage range improvement	Consistent. The Plan includes the equivalent Policy AG-3.A.

Policy Requirement	Discussion
<p>and fire hazard reduction programs, including prescribed burning of brush and alternative non-burning techniques. Such programs shall be designed and conducted to avoid excessive erosion and other significant adverse effects on the environment for the purpose of increasing water yields, improving wildlife habitat, wildlife protection, and increasing agricultural productivity.</p>	
<p>Agricultural Element Policy IV.B. Because of fire-risk reduction or soil instability, the use of certain slopes for agricultural production may be preferable to leaving the land in its natural state, or allowing non-agricultural development provided that adverse effects are minimized.</p> <p>Agricultural Element Policy IV.C. Grading and brush clearing for new agricultural improvements on hillsides shall not cause excessive erosion or downslope damage.</p>	<p>Consistent. The Plan includes Policy AG-3.B, which requires grading and brush clearing for new agricultural improvements on hillsides to not cause excessive erosion or downslope damage. Action AG-3 requires the County to develop Steep Slopes Development Standards setting enhanced standards for agricultural development on slopes of 30 to 40 percent or greater on agriculturally-zoned land. The standards may include preparation of an erosion control plan with best management practices to ensure slope stabilization, soil conservation, water quality control, and preferred land clearing methods. Steep Slope Guidelines developed by the Cachuma Resource Conservation District are incorporated into the Plan as Appendix D and zoning ordinance amendments require compliance with these standards for applicable agricultural development. In the final Plan, Action AG-3 is replaced by new Dev Std AG-3, which requires adherence to the Steep Slope Guidelines on slopes of 30% or greater.</p>
<p>Agricultural Element Goal V. Santa Barbara County shall allow areas and installations for those supportive activities needed as an integral part of the production and marketing process on and/or off the farm.</p> <p>Agricultural Element Policy V.A. Santa Barbara County shall permit on-farm supportive installations for product handling and selling as prescribed in the Uniform Rules of the County’s Agricultural Preserve Program.</p> <p>Agricultural Element Policy V.B. Santa Barbara County should allow areas for supportive agricultural services within reasonable distance and access to the farm user.</p>	<p>Consistent. The Plan includes Goal AG-1.B, which allows areas and installations for those supportive activities needed as an integral part of the production and marketing process on and/or off the farm. Action AG-4, AG-5 and AG-6 would develop permit and zoning requirements to allow for agricultural processing appropriate for the Plan Area, would implement the Gaviota Agricultural Tiered Permit Structure Amendments into the LUDC and Article II, and would support agricultural tourism.</p>
<p>Agricultural Element Goal VI: The County should make effective-provision for access to agricultural areas and for the necessary movement of agricultural crops and equipment.</p>	<p>Consistent. The Plan includes the equivalent Goal AG-4.</p>
<p>Agricultural Element Policy VI.A. To the maximum extent feasible, the County Public Works Department shall design roads with the type and size of vehicles and/or equipment in mind which are used in the</p>	<p>Consistent. The Plan includes the equivalent Policy AG-4.A.</p>

Policy Requirement	Discussion
agricultural operations of the area.	
Open Space Element	
<p>The Open Space Element addresses open space for public health and safety, the managed production of resources, outdoor recreation and the preservation of natural resources. This Element relates closely to the Seismic/Safety Element and the Conservation Element, and they are all synthesized in the Environmental Resources Management Element. Consistency with these elements is discussed elsewhere in this section. Specific resources along the Gaviota Coast are discussed in the Element, generally addressing the undisturbed nature of the many biological and cultural resources present at many of the remote bluffs and natural open space areas.</p>	<p>Consistent. The Plan Area has substantial open space areas, including agricultural and recreational lands that are addressed in the Plan, including various natural resources stewardship policies (Policies NS-1 through NS-11, Actions NS-1 through NS-7, and Dev Stds NS1 through NS-5), recreation policies (Policies REC-1 through REC-21, Dev Std REC-1, and Actions REC-1 through REC-9), and Agricultural Goals and Policies, as discussed under the Agricultural Element consistency analysis above.</p>
Scenic Highways Element	
<p>The Scenic Highways Element contains several preservation measures for scenic highways and their designation to assist in preserving and enhancing the most scenic areas along designated roadways within the County. The preservation measures within this Element include the regulation of land use to ensure that development in the scenic corridor will not conflict with the scenic objectives, a requirement for development plans for urban areas within the scenic corridors and overlays in rural areas, control of outdoor advertising, regulation of grading and landscaping, and design of structures and equipment.</p>	<p>Consistent. The coastal view corridor along Highway 101 from Goleta to the Gaviota Tunnel provides high quality views of ocean and inland public views. The Plan includes a site design hierarchy to ensure a consistent approach to implement visual resources protection on the Gaviota Coast. A Critical Viewshed Corridor Overlay is incorporated into the Plan and zoning ordinances and would require visual screening according to the site design hierarchy. Numerous visual resources policies are included in the Plan to achieve Plan Goal VIS-1: To protect and enhance the rural, scenic, and visual qualities of the Gaviota Coast. Policy VIS-3 requires development to be sited so as not to intrude into the skyline as seen from public viewing places.</p>
Seismic Safety and Safety Element	
<p>The Seismic Safety and Safety Element contains policies intended to minimize or eliminate potential fire, geological, soil or seismic hazards related to land use planning and development. The Element includes recommendations to avoid locating development in high hazard area and includes recommendations to reduce potential geological and flood hazards.</p>	<p>Consistent. The Plan includes Action AG-3, which would require the County to develop steep slopes development standards to ensure slope stabilization, soil conservation, and water quality control to minimize erosion due to agricultural development on steep slopes. In the final Plan, Action AG-3 is replaced by new Dev Std AG-3, which requires adherence to the Steep Slope Guidelines, incorporated into the Plan as Appendix D, on slopes of 30% or greater. Policy AG-1.A intends to prevent flooding and sedimentation. Policy AG-3.A promotes development of fire hazard reduction programs within the Inland Area of the Plan. Action LU-7 requires the County to research and respond to the impacts of climate change related hazards on the</p>

Policy Requirement	Discussion
	Gaviota Coast
Safety Element Supplement	
<p>The Safety Element Supplement focuses on the role of land-use planning in reducing the risk of exposure to hazardous materials.</p>	<p>Consistent. Policy TEI-12 discourages the use of enhanced oil and gas recovery techniques such as hydraulic fracturing and steam injection in the Plan Area. In addition, a site design hierarchy provides a framework for siting and design criteria and considers hazards, such as fire and oil and gas pipelines.</p>

ATTACHMENT D: PLANNING COMMISSION RESOLUTION

**RESOLUTION OF THE SANTA BARBARA COUNTY PLANNING COMMISSION
COUNTY OF SANTA BARBARA, STATE OF CALIFORNIA**

IN THE MATTER OF RECOMMENDING TO THE)
BOARD OF SUPERVISORS THE ADOPTION OF)
AMENDMENTS TO THE COASTAL LAND USE)
PLAN OF THE SANTA BARBARA COUNTY LOCAL) RESOLUTION NO. 16- _____
COASTAL PROGRAM, THE LAND USE ELEMENT)
OF THE SANTA BARBARA COUNTY) CASE NOS: 13GPA-00000-00006
COMPREHENSIVE PLAN, THE ARTICLE II COASTAL) 13GPA-00000-00007
ZONING ORDINANCE, THE COUNTY LAND USE) 13ORD-00000-00006
AND DEVELOPMENT CODE, AND THE COASTAL) 13ORD-00000-00007
LAND USE PLAN MAPS, THE LAND USE ELEMENT) 13RZN-00000-00002
MAPS, THE ARTICLE II MAPS, AND THE COUNTY) 13RZN-00000-00003
ZONING MAP, THAT DELINEATE LAND USE AND)
ZONING DESIGNATIONS WITHIN THE GAVIOTA)
COAST PLAN AREA, TO IMPLEMENT THE GOALS,)
POLICIES, AND DEVELOPMENT STANDARDS OF)
THE GAVIOTA COAST PLAN.)

WITH REFERENCE TO THE FOLLOWING:

- A. On January 7, 1980, by Resolution No. 80-12, the Board of Supervisors of the County of Santa Barbara adopted the Santa Barbara County Coastal Land Use Plan.
- B. On December 20, 1980, by Resolution No. 80-566, the Board of Supervisors adopted the Land Use Element of the Comprehensive Plan for the County of Santa Barbara.
- C. On July 19, 1982, by Ordinance No. 3312, the Board of Supervisors adopted the Santa Barbara County Coastal Zoning Ordinance, Article II of Chapter 35, Zoning, of the Santa Barbara County Code, which included, by reference, a series of maps that delineate the zone and overlay zone designations that apply to property located within the unincorporated area of the County of Santa Barbara located within the Coastal Zone.
- D. On November 27, 2007, by Ordinance 4660, the Board of Supervisors adopted the Santa Barbara County Land Use and Development Code, Section 35-1 of Chapter 35 of the Santa Barbara County Code, which included, by reference, the County Zoning Map that delineates the zone and overlay zone designations that apply to property located within the unincorporated area of the County of Santa Barbara located outside the Coastal Zone.
- E. The proposed amendments are consistent with the Santa Barbara County Comprehensive Plan, including the Community and Area Plans, the Santa Barbara County Local Coastal Program, and the requirements of California planning, zoning, and development laws.
- F. Citizens, California Native American Indian tribes, public agencies, public utility companies, and civic, education, and other community groups have been provided the opportunity for involvement in compliance with Government Code.

- G. The County contacted and offered to conduct consultations with California Native American tribes in compliance with Government Code Sections 65352.3 and 65352.4.
- H. This County Planning Commission has held a duly noticed hearing in compliance with Government Code Sections 65353 and 65854 on the proposed amendments and ordinances, at which hearing the amendments and ordinances were explained and comments invited from the persons in attendance.
- G. In compliance with Government Code Section 65855, which requires the County Planning Commission's written recommendation on the proposed amendments and ordinances to include the reasons for the recommendation and the relationship of the proposed ordinances and amendments to applicable general and specific plans, the County Planning Commission has determined that the proposed amendments and ordinances are consistent with the Comprehensive Plan, including the Gaviota Coast Plan, and provide the greatest community welfare without compromising community values, environmental quality, or the public health and safety, as included in the findings in Attachment B of the County Planning Commission staff report dated July 20, 2016, which is included by reference. The County Planning Commission has also determined that the Gaviota Coast Plan and associated amendments to the Land Use Element and Coastal Land Use Plan of the Comprehensive Plan make it consistent with the Comprehensive Plan.

NOW, THEREFORE, IT IS HEREBY RESOLVED as follows:

- 1. The above recitations are true and correct.
- 2. The County Planning Commission now finds that it is in the interest of the orderly development of the County and important to the preservation of the health, safety and general welfare of the residents of the County to recommend that the Board of Supervisors adopt the following Resolutions and Ordinances that would implement the goals, policies and development standards of the Gaviota Coast Plan:
 - a. A Resolution amending the Land Use Element (Case No. 13GPA-00000-00006) of the Santa Barbara County Comprehensive Plan (Attachment 1);
 - b. An Ordinance amending the County Land Use and Development Code (Case No. 13ORD-00000-00006), Section 35-1 of Chapter 35, Zoning, of the Santa Barbara County Code (Attachment 2);
 - c. An Ordinance amending the County Zoning Map (Case No. 13RZN-00000-00002) (Attachment 3);
 - d. A Resolution amending the Coastal Land Use Plan (Case No. 13GPA-00000-00007) of the Santa Barbara County Local Coastal Plan (Attachment 4);
 - e. An Ordinance amending the Article II Coastal Zoning Ordinance (Case No. 13ORD-00000-00007) of Chapter 35, Zoning, of the Santa Barbara County Code (Attachment 5);
 - f. An Ordinance amending the Article II Coastal Zoning Ordinance of Chapter 35, Zoning, of the Santa Barbara County Code by repealing and retiring the Gaviota Coast Rural Region Zoning Map, the North Gaviota Coast Rural Region Zoning Map, the Gaviota Coast Coastal Plan Zoning Overlay Map, and the Point Conception Coastal Plan Zoning Overlay

Map, and amending the Lompoc Valley Rural Region Zoning Map, and adopting new Gaviota Coast Plan Zoning Maps, new Gaviota Coast Plan Zoning Overlay Maps, and new Gaviota Coast Plan Environmentally Sensitive Habitat Overlay (Case No. 13RZN-00000-00003) (Attachment 6); and

- h. A Resolution adopting the Gaviota Coast Design Guidelines (Attachment 7).
3. This County Planning Commission recommends that the Board of Supervisors of the County of Santa Barbara, State of California, following the required noticed public hearing, approve and adopt the above mentioned recommendation of this County Planning Commission, based on the findings included as Attachment B of the County Planning Commission staff memo dated September 7, 2016.
4. This County Planning Commission endorses and transmits a certified copy of this Resolution to the Board of Supervisors in compliance with Government Code Section 65354 and Section 65855.
5. The Chair of this County Planning Commission is hereby authorized and directed to sign and certify all maps, documents, and other materials in accordance with this Resolution to show the above mentioned action by the County Planning Commission.

PASSED, APPROVED AND ADOPTED this _____, 2016 by the following vote:

AYES:

NOES:

ABSTAIN:

ABSENT:

LARRY FERINI, Chair
Santa Barbara County Planning Commission

ATTEST:

DIANNE BLACK
Secretary to the Commission

APPROVED AS TO FORM:

MICHAEL C. GHIZZONI
COUNTY COUNSEL

By _____
Deputy County Counsel

ATTACHMENTS:

1. Board of Supervisors Resolution Amending the Land Use Element (Case No. 13GPA-00000-00006)
2. Board of Supervisors Ordinance Amending the County Land Use and Development Code (Case No. 13ORD-00000-00006)
3. Board of Supervisors Ordinance Amending the County Zoning Map (Case No. 13RZN-00000-00002)
4. Board of Supervisors Resolution Amending the Coastal Land Use Plan (Case No. 13GPA-00000-00007)
5. Board of Supervisors Ordinance Amending the Article II Coastal Zoning Ordinance (Case No. 13ORD-00000-00007)
6. Board of Supervisors Ordinance Amending the Article II Coastal Zoning Ordinance of Chapter 35, Zoning, of the Santa Barbara County Code by repealing and retiring the Gaviota Coast Rural Region Zoning Map, the North Gaviota Coast Rural Region Zoning Map, the Gaviota Coast Coastal Plan Zoning Overlay Map, and the Point Conception Coastal Plan Zoning Overlay Map, and amending the Lompoc Valley Rural Region Zoning Map, and adopting new Gaviota Coast Plan Zoning Maps, new Gaviota Coast Plan Zoning Overlay Maps, and new Gaviota Coast Plan Environmentally Sensitive Habitat Overlay Maps (Case No. 13RZN-00000-00003)
7. Board of Supervisors Resolution Adopting Gaviota Coast Plan Design Guidelines

ATTACHMENT D-1: LAND USE ELEMENT RESOLUTION

Board of Supervisors Resolution
Amending the Land Use Element
(Case No. 13GPA-00000-00006)

See Attachment D-1 of Staff Report dated July 20, 2016

<http://sbcountyplanning.org/PDF/boards/CntyPC/07-27-2016/13GPA-00000-00006/Attachment%20D-1%20BOS%20Resolution%20Land%20Use%20Element.pdf>

ATTACHMENT D-3: COUNTY LUDC REZONE ORDINANCE AMENDMENT

Board of Supervisors Ordinance
Amending the County Zoning Map
(Case No. 13RZN-00000-00002)

See Attachment D-3 of Staff Report dated July 20, 2016

<http://sbcountyplanning.org/PDF/boards/CntyPC/07-27-2016/13GPA-00000-00006/Attachment%20D-3%20BOS%20InlandMapAmendment.pdf>

ATTACHMENT D-4: COASTAL LAND USE PLAN RESOLUTION

Board of Supervisors Resolution
Amending the Coastal Land Use Plan
(Case No. 13GPA-00000-00007)

See Attachment D-4 of Staff Report dated July 20, 2016

<http://sbcountyplanning.org/PDF/boards/CntyPC/07-27-2016/13GPA-00000-00006/Attachment%20D-4%20BOS%20Resolution%20Coastal%20Plan.pdf>

ATTACHMENT D-6: COASTAL ZONING ORDINANCE REZONE ORDINANCE

Board of Supervisors Ordinance Amending
the Article II Coastal Zoning Ordinance of Chapter 35, Zoning, of the Santa Barbara County Code by
repealing and retiring the Gaviota Coast Rural Region Zoning Map, the North Gaviota Coast Rural
Region Zoning Map, the Gaviota Coast Coastal Plan Zoning Overlay Map, and the Point Conception
Coastal Plan Zoning Overlay Map, and amending the Lompoc Valley Rural Region Zoning Map, and
adopting new Gaviota Coast Plan Zoning Maps, new Gaviota Coast Plan Zoning Overlay Maps, and
new Gaviota Coast Plan Environmentally Sensitive Habitat Overlay Maps
(Case No. 13RZN-00000-00003)

See Attachment D-6 of Staff Report dated July 20, 2016

<http://sbcountyplanning.org/PDF/boards/CntyPC/07-27-2016/13GPA-00000-00006/Attachment%20D-6%20BOS.pdf>

ATTACHMENT D-7: DESIGN GUIDELINES RESOLUTION

Board of Supervisors Resolution
Adopting the Gaviota Coast Plan Design Guidelines

See Attachment D-7 of Staff Report dated July 20, 2016

<http://sbcountyplanning.org/PDF/boards/CntyPC/07-27-2016/13GPA-00000-00006/Attachment%20D-7%20BOS%20Resolution%20Design%20Guidelines.pdf>