



October 9, 2015

Chair Janet Wolf  
Board of Supervisors  
County of Santa Barbara  
105 East Anapamu Street  
Santa Barbara, CA 93101  
*allen@co.santa-barbara.ca.us*

**Re: Eastern Goleta Valley Community Plan – More Mesa**

Dear Chair Wolf and Honorable Supervisors:

On behalf of the More Mesa Preservation Coalition, the Environmental Defense Center respectfully requests that the Board of Supervisors require revisions to the Final Environmental Impact Report (“EIR”) and California Environmental Quality Act (“CEQA”) Findings for the Eastern Goleta Valley Community Plan (“EGVCP”) in order to fix an error and accurately reflect the potential impacts regarding development at More Mesa. Consistent with the prior EIR for the Goleta Community Plan, the Final EIR for the EGVCP must be revised to note that development of More Mesa would result in Class I impacts to Biology and Aesthetics. Similarly, the CEQA Findings must be revised to find that development of More Mesa would result in Class I impacts to Biology and Aesthetics.

According to the 1992 Goleta Community Plan Final EIR, development at More Mesa would result in Class I (significant and unavoidable) impacts to Biology and Aesthetics. (See GCP FEIR at VIII-3, Table VIII-1, attached hereto). Even a reduction to 50 units (Alternative A) was determined to result in Class I impacts to Biology (GCP FEIR at VIII-28, attached hereto). The approved Goleta Community Plan allowed up to 70 units which is retained in the proposed EGVCP. Despite the fact that the allowed development in the EGVCP clearly will result in Class I impacts to Biology (and possibly to Aesthetics; the GCP EIR did not analyze the impacts associated with development of 70 units, finding however that development of 106 clustered units would result in a Class I impact and a reduction to 50 units would result in a Class II impact), the Final EIR states that development at More Mesa will result in Class II (significant but mitigable) impacts to Biology and Aesthetics.

No changes are proposed for More Mesa in the EGVCP (EGVCP FEIR at 4.1-17). Nevertheless, the EGVCP FEIR states that *all* impacts from development at More Mesa would be less than significant (Class II), including Impacts to Biology and Aesthetics. (See EGVCP Final EIR Table S-1 at S-13, S-19; see also Final EIR at pp. 4.3-23, 4.3-30, 6-18, attached hereto.)

**There is no absolutely no evidence in the record that retaining potential development of 70 units would result in Class II impacts to Biology and Aesthetics.** The Goleta Community Plan FEIR found that a reduction to 50 units would still result in Class I impacts to Biology. Although a reduction to 30 or 50 units was predicted to result in Class II Aesthetic impacts, there has been no analysis of the impacts that would result from development of 70 units. Accordingly, there is no evidence in the record to support the conclusion in the EGVCP EIR that development at More Mesa would result in Class II (less than significant) impacts to Biology and Aesthetics.

County Planning and Development staff have confirmed that the change from a Class I impact to a Class II impact at More Mesa was inadvertent and a mistake. The correction requested herein is a technical correction and does not change anything in the EGVCP, which does not propose or analyze any changes at More Mesa. We do not believe that this correction would require recirculation of the EIR because this is not “new” information as contemplated by CEQA, but rather a correction and restatement of the determination in the Goleta Community Plan EIR which should be unchanged due to the fact that no changes are proposed to the development at More Mesa. Had the EGVCP proposed a change in the development allowed at More Mesa that would have necessitated a change to a Class I impact, recirculation may have been required but that is simply not the case here. There is no change in the plan, no change in the development potential at More Mesa, and no change in the significance of the impacts at that site. Hence, this correction does not require recirculation of the EIR.

On the other hand, retaining the Class II determination and findings would violate CEQA’s mandate that agency decisions must be supported by substantial evidence. (Pub. Res. Code sections 21168, 21168.5; see also *Topanga Association for a Scenic Community v. County of Los Angeles* (1974) 11 Cal.3d 506.) As stated above, there is ***no evidence*** supporting the Class II determination and finding.

**Based on the foregoing, the County must revise the Final EIR and CEQA Findings as follows:**

EGVCP Final EIR Revisions

- Table S-1: revise Table S-1 to state that development at More Mesa will result in Class I, not Class II, impacts to Biology and Aesthetics (Final EIR at S-13, S-19);
- Executive Summary: add Class I impacts to Biology and Aesthetics from development at More Mesa (Final EIR at pp. S-6, 7);

- Aesthetics/Visual Resources: revise the discussion regarding development at More Mesa to state that such development would result in Class I impacts to Aesthetics (Final EIR at pp. 4.3-23, 4.3-30); and
- Alternatives: revise the discussion regarding development at More Mesa to state that such development would result in Class I impacts to Aesthetics/Visual Resources (Final EIR at p. 6-18).

CEQA Findings

The County's adoption of the CEQA Findings must similarly be revised to state that impacts of development at More Mesa under the EGVCP would result in Class I impacts to Biology and Aesthetics.

Thank you for your consideration of these comments.

Sincerely,



Linda Krop  
Chief Counsel

Attachments

GCP Final EIR excerpts  
EGVCP Final EIR excerpts

cc: More Mesa Preservation Coalition

EDC

**VOLUME 1**  
**ENVIRONMENTAL**  
**IMPACT REPORT**

*Goleta Community Plan*

**FINAL ENVIRONMENTAL IMPACT REPORT**

91-EIR-13 (STATE CLEARINGHOUSE NO. 90010559)



**County of Santa Barbara**  
Resource Management Department  
123 East Anapamu Street  
Santa Barbara, CA 93101  
(805) 568-2020  
Contact Person: Barbara Shelton  
August 1992

**EIR Public Comment Period**

A 45-day public review and comment period is provided for this proposed Final Environmental Impact Report (EIR). Please submit written comments on this EIR to the address above.

A public hearing to take verbal comments on this EIR will be held by the Resource Management Department on September 10, 1992, 5:00-10:00 p.m., at the Goleta Valley Community Center, 5679 Hollister Avenue, Goleta.

The EIR public comment period closes September 23, 1992, 5:00 p.m. Comments and County responses will be added to the Final EIR prior to its consideration for certification by the County Board of Supervisors.

Table VIII-1 (Continued)

PARCEL-SPECIFIC IMPACTS  
 BY LEVEL OF SIGNIFICANCE (CLASS I, II, III)<sup>1</sup>  
 (See Figure III-6 for location of parcels)

Parcel #	Location	Potential Buildout Density	Biology	Cultural	Geology	Agriculture	Noise	Aesthetics	Risk	Fire Services
17	Mission Industries	Mobile Home Park	II	II	II	I	II	II	III	III
18	Warren and Adjoining	FAR 0.19	No Impact	II	II	No Impact	III	III	III	III
19	Patterson/Calle Real	10 du/ac	I	II	II	I	II	I	II	III
20	Patterson/Ward Ag. Area	Agriculture Greenhouse	III	II	II	III	III	III	III	II
21	Pozzato	Agriculture Recreation	III	II	III	III	III	III	III	III
22	More Mesa	106 du(PD)	I	II	II	II	II	I	II	II
23	NW San Marcos/Hollister	Agriculture	No Impact	II	III	II	III	III	III	III
24	San Marcos Growers	Agriculture	III	II	III	III	III	III	III	III
25	Fortie Ranch	5 ac/du & 12.3 du/ac	III	III	II	I	II	II	III	III
26	Pebble Hill	10 du/ac & 4.6 du/ac	II	II	II	III	II	II	III	II
27	Camino de Vida	10 du/ac	III	II	III	III	II	II	III	III
28	Hollipat	8 du/ac	II	II	II	III	II	II	III	II
29	Bartlett and Adjoining	FAR 0.19	No Impact	II	No Impact	No Impact	III	III	III	III
30	Hollister Trailer Park	16 du/ac	II	II	II	No Impact	II	III	II	III
31	Hollister Corridor	FAR 0.19	No Impact	III	II	No Impact	II	II	II	III
32	Trailer Park/School District	FAR 0.19	No Impact	II	III	No Impact	II	III	II	III

## Alt. A (50 units)

### Major Policy Alterations

Incorporation of the following new policies and/or alterations to proposed policies would assist in further reducing impacts of the proposed project.

- Transfer of Development Rights.
- Service Industrial Zone District
- Affordable Housing Zone District

### Summary of Impacts

**Biology.** Overall impacts to biological resources would remain substantially the same under this alternative in that much of the valley's currently open spaces would be converted to urban uses, directly eliminating habitat areas and bringing increased urban and agricultural pressures on remaining habitats. In addition, increased impacts to biological resources would occur on the Couvillion, Winchester Common, Mountain View/Koart, and Bishop Ranch parcels. However, reduced development on the Santa Barbara Shores Park, Southwest Diversified, and West Devereux parcels would substantially decrease, but not fully mitigate impacts to the Devereux Slough ecosystem. The same reduced, but not eliminated impacts would hold true for density reductions on More Mesa. The benefits of these density reductions, along with those in the foothills, would make this alternative's impact on biology substantially lower than the proposed project in selected areas or ecological systems. However, potential impacts associated with foothill agricultural operations and expansion would remain.

**Cultural Resources.** Impacts to cultural resources would remain potentially significant, as characterized in the EIR. In addition, potential removal of the Bishop Ranch as a consequence of the TDR program may be considered a significant unavoidable impact due to the high sensitivity of the site for both historic and prehistoric resources.

**Geology.** Geologic impacts would be similar to those described in the EIR, with the exception that reducing the buildout in the foothills would potentially reduce grading created erosion hazards, foundation problems associated with high shrink-swell soils, and landslide potential.

**Noise.** The overall noise impact level from buildout of this alternative would be similar to that resulting from the plan. However, additional residential units designated along the Hollister and Patterson corridors within this alternative would have the potential for further increasing ambient noise levels along the corridors and increasing the number of noise-sensitive uses exposed to noise impacts. Significant unavoidable impacts would include airport noise impacts to sensitive uses; traffic noise along segments of Hollister and Patterson; and roadways with greater than 8,000 ADT.

**Agriculture.** Agricultural impacts would generally remain as characterized in the EIR, since the Mountain View and Couvillion parcels would be converted from agriculture to residential. However, impacts to NW San Marcos/Hollister parcel would be eliminated, and those to the San Marcos Road North area would be reduced by revising the designation to non-rural agriculture, A-I and A-I-10 respectively. The potential loss of the Bishop Ranch as an agricultural operation would also be a significant unavoidable impact.

**Aesthetics/Open Space.** Impacts to aesthetics/open space resources would be substantially reduced under this alternative through reduced density on the Santa Barbara Shores, Southwest Diversified, West Devereux, and More Mesa parcels. In addition, view corridors along east Hollister would be preserved through the retention of the NW San

**County of Santa Barbara**  
Eastern Goleta Valley Community Plan  
Draft Final Environmental Impact Report  
14EIR-00000-00005  
SCH #2012091048

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May 2015

**Volume I:**  
EIR Analysis

Table S-1: Summary of Environmental Impacts, Mitigation Measures, and Significance after Mitigation		Impact	Land Use and Planning	Mitigation Measures	Significance After Mitigation	Impact Classification
<b>LU-1 Land Use Compatibility</b>						
Plan Buildout and Rezones						
Urban/Rural Boundary	The proposed changes to the Urban/Rural boundary would promote compact urban development and protect important agricultural lands and rural lands from encroachment and conversion to urban-style development.		None required.		Impacts would be beneficial without mitigation.	Class IV
Rural Area	Buildout of the Rural Area consistent with the Plan update would protect existing agricultural uses and open space from conversion to more intensive uses and would protect sensitive resources and steep slopes.		None required.		Impacts would be beneficial without mitigation.	Class IV
National Forest Interface	The placement of rural uses adjacent to National Forest Lands would not result in land use compatibility impacts. Additionally, Plan update policies relating to hydrology and biology would help alleviate potential adjacency issues and conflicts.		The Plan update includes Policies LUA-EGV-1.4 and EGV-3.2, which would reduce impacts associated with the National Forest Interface.		Impacts would be less than significant with implementation of the proposed policies and standards.	Class II
Urban Area	Proposed development of existing open parcels with residential uses adjacent to existing residential neighborhoods would not disrupt the physical arrangement of the existing community, but would contribute to incremental increases in noise and air emissions from increased activity and traffic.		Policies and mitigation measures referenced in Air Quality, GHG Emissions, and Noise below would apply to future development in the Urban Area, which would reduce impacts.		Impacts would be less than significant with implementation of the proposed policies and standards.	Class II
Hollister Commercial Corridor	Redevelopment with higher intensity uses adjacent to single-family residential or agricultural uses could, over time, change the character of an existing neighborhood.		The Plan update includes policies (such as Policy EGV-3.1, Policy EGV-3.3, and Policy EGV-4.1) and development standards (such as DevStd EGV-4A, DevStd EGV-4B, and DevStd LUR-EGV-1A), which would reduce impacts associated with neighborhood character.		Impacts would be less than significant with implementation of the proposed policies and standards.	Class II
More Mesa	The integration of residential and commercial uses would reduce local vehicle travel distances (vehicle miles traveled) and improve the viability of alternative modes of travel, and thereby, reduce localized air quality impacts. Also, the mixed-use zoning would contribute to the revitalization of an aging commercial corridor, provide for a complete transportation system, and implement aesthetic streetscape improvements. New businesses would provide employment and make more goods and services available locally, helping reduce regional automobile travel and resulting emissions of greenhouse gases.		None required.		Impacts would be beneficial without mitigation.	Class IV
St. Vincent's Site	Development of More Mesa could result in impacts to the site's biological resources and aesthetic character.		The Plan update contains development standards specific to buildout of More Mesa: DevStd LUDS-EGV-1A, DevStd LUDS-EGV-1G, DevStd LUDS-EGV-1J, and DevStd LUDS-EGV-1L, which would serve to reduce impacts related to biological resources and aesthetic character.		Impacts would be less than significant with implementation of the proposed policies and standards.	Class II
Urban Agriculture	Potential land use compatibility issues could arise from the placement of housing in proximity to the freeway.		The Plan update includes policies and standards relative to the buildout of residential land uses on-sites such as Policy LUDS-EGV-2.1, DevStd LUDS-EGV-2A, DevStd LUDS-EGV-2B, DevStd LUDS-EGV-2C, and DevStd LUDS-EGV-2D which would serve to reduce impacts related to land use compatibility.		Impacts would be less than significant with implementation of the proposed policies and standards.	Class II
Applicable Community Plan Update Policies, Programs, and Standards	The Plan update would result in the continuation of existing conflicts and potentially new conflicts between agricultural and surrounding sensitive uses, such as residences and schools.		The Plan update includes policies and standards that would apply to all properties with agricultural land use designations within the Plan area: DevStd LUA-EGV-1A, LUA-EGV-1.2, DevStd LUA-EGV-1B, DevStd LUA-EGV-1C, LUA-EGV-1.3, and LUA-EGV-2.4, which would serve to reduce impacts related to potential land use conflicts.		Impacts would be less than significant with implementation of the proposed policies and standards.	Class II
	The policies and standards proposed as part of the Plan update seek to preclude impacts associated with incompatible land uses that could occur as a result of buildout of the Plan update and rezones.		None required.		Impacts would be beneficial without mitigation.	Class IV



Table S-1: Summary of Environmental Impacts, Mitigation Measures, and Significance after Mitigation			
Issue	Impact	Mitigation Measures	Impact Classification
Coastal Area	The development of More Mesa has potential to result in significant but mitigable biological and aesthetic character impacts.	The Plan update includes policies and standards, referenced above, as well as development standards specific to buildout of More Mesa (see Section 4.1 Land Use). In addition, the adoption of a Specific Plan and associated site-specific development standards and design guidelines would ensure that development of More Mesa would be compatible with existing surrounding land uses and not result in a significant negative change to visual character.	Class II
Mountainous Area	The proposed changes to the Urban/Rural boundary would promote compact urban development and protect important agricultural lands and rural lands from encroachment and conversion to urban-style development. This would be a beneficial effect as the quiet or rural character of the northern portion of the Plan area would be relatively unimpacted.	None required.	Class IV
Applicable Community Plan Update Policies, Programs, and Standards	The plan update contains policies and standards, which would reduce impacts on visual character to less than significant.	None required.	Class III
Housing Opportunity Sites	Development of the housing opportunity sites would result in the same visual character impacts as described under the Urban Area, above.	The Plan update includes policies and standards, referenced under Urban Area above, that would reduce impacts of development of the housing opportunity sites on visual character.	Class II
<b>VS-2 Public Scenic Views, Routes and Gateways</b>			
Plan, Buildout and Rezones			
Urban Area	Much of the new development and redevelopment anticipated under the Plan update would occur within designated scenic corridors. Therefore, buildout of the Plan update within the urban area has the potential to impact scenic views, scenic routes and a community gateway.	The Plan update includes policies and standards that would reduce visual impacts of development in urban areas. Policy VIS-EGV-1.1, VIS-EGV-1.2, VIS-EGV-1.3, VIS-EGV-1.4, VIS-EGV-1.5, VIS-EGV-1.9, DevStd VIS-EGV-1A, DevStd VIS-EGV-1B, DevStd VIS-EGV-1C, DevStd VIS-EGV-1D, DevStd VIS-EGV-1E, DevStd VIS-EGV-1F, DevStd VIS-EGV-1G.  In addition, a number of existing regulations and review processes that serve to ensure that specific types of new development are designed, sited and landscaped to avoid or minimize obstruction or degradation of public scenic views and creation of offensive or inconsistent views or conditions.	Class II
Coastal Area	Scenic views would be maintained from the majority of More Mesa and from public trails that traverse the area.	The Plan update includes policies and standards, as identified above and in Section 4.1 Land Use relative to the development of More Mesa that would reduce visual impacts of development in the coastal areas. The Plan update specifies that the intensity of future development at More Mesa must be consistent with the long-term protection of the site's biological and aesthetic character. Much of the coastal area, therefore, would be retained as natural open space, including a 36-acre area owned by the County. Scenic views would be maintained from the majority of the site and from public trails that traverse the area.	Class II
Mountainous Area	The proposed changes to the Urban/Rural boundary would promote compact urban development and protect important agricultural lands and rural lands from encroachment and conversion to urban-style development.	None required.	Class III
Applicable Community Plan Update Policies, Programs, and Standards	The Plan update contains policies and standards, which seek to reduce impacts on scenic views. Proposed policies would maintain scenic views by requiring design review for development. In particular, the policies require design review of mixed use projects and provide guidance for development on hillsides, development impacting public vistas and development along scenic routes.	None required.	Class III

development may occur within the proposed mixed-use areas, overall aesthetics may improve with revitalization and cohesion of design on undeveloped and underdeveloped sites.

The Plan update would retain the South Patterson Agricultural Area and the San Marcos Agricultural Area, both located within the urban fabric of the Plan area. Preservation of existing urban agricultural areas would help preserve the existing semi-rural character of the Plan area, and in the case of the San Marcos Agricultural Area, it would also help preserve and protect mountain views. Urban agricultural areas also provide a visual transition between urban uses and rural lands at the urban fringe. The Plan update includes several policies cited in 4.1, Land Use, which would help ensure the compatibility of urban agriculture relative to surrounding land uses. Overall, significant but mitigable impacts associated with changes in visual character in the Urban Area may result from buildout of the Plan update (Class II impact).

### **Coastal Area**

More Mesa is currently a vacant site located within the Coastal Zone. The Plan update would allow potential development of up to 40 acres with up to 70 units at More Mesa. Development standards, cited in Section 4.1, Land Use, call for the long-term protection of the site's biological and aesthetic character. Implementation of the proposed standards, including the adoption of a Specific Plan, which would include site-specific development standards and design guidelines, would ensure that development of More Mesa would be compatible with existing surrounding land uses and not result in a significant negative change to visual character. Impacts would be significant but mitigable (Class II impact).

### **Mountainous Area**

The Plan update includes the proposed realignment of the Urban/Rural boundary, which would entail re-designating more than 6,000 acres of land from the Urban Area to the Rural Area. Thus, the Plan update largely shifts new development away from the rural areas in the northern portion of the Plan area, and accommodates new growth primarily within the existing urban fabric. The proposed changes to the Urban/Rural boundary would promote compact urban development and protect important agricultural lands and rural lands from encroachment and conversion to urban-style development. This would be a beneficial effect as the quaint or rural character of the northern portion of the Plan area would be relatively unimpacted (Class IV impact).

### ***Applicable Community Plan Update Policies, Programs, and Standards***

The Plan update contains policies and development standards, which seek to minimize impacts on visual character that could occur as a result of buildout of the Plan update and rezones. The Plan update's policies relative to visual character are similar to those addressing land use incompatibility, as stated in Section 4.1 and include the following. In addition, the Plan update recommends the development of multi-family and mixed-use/commercial design guidelines as part of future implementation of the Plan update.

viewsheds and/or routes. For example, development in proximity to a scenic viewpoint could, by its location, obstruct, impair, or alter scenic views from the vicinity. Policies contained within the Plan update are intended to reduce this potential impact and are described below.

### **Urban Area**

The Plan update encourages infill development in areas already developed within the urban portions of the Plan area. The Plan update includes eight housing opportunity sites to accommodate new and affordable housing within the Plan area. (These are discussed in detail below). The Plan update also includes the new MU zone, which would increase opportunities for centrally located, residential infill development and retail commercial. The new MU zone would be located along the Hollister Avenue–State Street commercial corridor. Commercial buildout in the Plan area would be focused in the existing commercial corridors and along U.S. 101. Infill development can reduce the pressure to develop on the edge of the Urban Area, which could otherwise have impacts on surrounding scenic resources.

Several key public viewpoints of the mountains and foothills are located in proximity to U.S. 101, Hollister Avenue and Turnpike Road. Portions of Hollister Avenue and Turnpike Road also are identified as local scenic routes in the Plan update (refer to Table 4.3-1). A designated community gateway is located along Hollister Avenue at the Plan area boundary with the City of Santa Barbara. Much of the new development and redevelopment anticipated under the Plan update would occur within the aforementioned corridors. Therefore, buildout of the Plan update within the urban area has the potential to impact public scenic views, scenic routes and a community gateway. Future development would be subject to Plan update polices detailed below. Therefore, impacts on public scenic views, routes and gateways would be significant, but mitigable (Class II impact).

### **Coastal Area**

More Mesa is a 300-acre vacant site located within the Coastal Zone. One key public “360 degree” viewpoint is identified within More Mesa. The site also contains numerous trails, which receive extensive passive recreational use from hikers, cyclists, equestrians, and beach users and provide opportunities for scenic views.

The Plan update would allow potential development of up to 40 acres of the site with up to 70 units. Constraints limit the development potential of the site to areas primarily located outside of designated environmentally sensitive habitat areas. Further, the Plan update specifies that the intensity of such development must be consistent with the long-term protection of the site's biological and aesthetic character. Much of the site, therefore, would be retained as natural open space, including a 36-acre area owned by the County. Scenic views would be maintained from the majority of the site and from public trails that traverse the area. Impacts would be significant but mitigable (Class II impact).

during the A.M. peak hour period, which meets the LOS C standard. Therefore, the No Project Alternative would avoid this Plan update intersection impact.

### ***Applicable Community Plan Update Policies, Programs, and Standards***

The 1993 GCP contains policies addressing transportation, circulation, and parking (see Table 5.2-1). As discussed in Section 4.2 of this EIR, the Plan update contains new policies for the implementation of complete streets. Policy TC-EGV-1.6 specifically identifies the community corridors that have been prioritized for the multi-modal improvements. The Plan update also incorporates new policies to encourage a variety of parking options, address speed limit enforcement, promote the use of recycled water in public landscaping, and address environmental considerations in transportation planning. Other policies from the GCP have been revised and updated in the Plan update while maintaining the intent of the existing policy. Compared to the Plan update, the No Project Alternative would not implement these new policies aimed at improving circulation and prioritizing multi-modal improvements in the Plan area. As a result, the No Project Alternative would have slightly greater impacts in relation to Plan update policies, programs and standards that support circulation and multi-modal improvements.

### ***Housing Opportunity Sites***

Under the No Project Alternative, the housing opportunity sites would yield substantially fewer units, and limited mixed-use development would occur within the Hollister Avenue–State Street commercial corridor. Thus, traffic generated by development at the housing opportunity sites would be less under the No Project Alternative when compared to the Plan update. Impacts TC-1 and TC-2, discussed above, would still occur under the No Project Alternative. However, the impacts would be slightly reduced due to reduced trips on the affected segment and intersection, resulting in part from lower densities on the housing opportunity sites and elimination of the mixed use (MU) zone. While traffic generated from the housing opportunity sites would be less, overall vehicle trip lengths would be greater under the existing GCP compared to the Plan update due to the distance of existing and potential housing development from job centers and commercial services.

### ***Aesthetics/Visual Resources***

The analysis completed for the Plan update found that visual character would change in the urban and coastal areas, resulting in potentially significant but mitigable impacts (Class II) due to development on More Mesa, higher density land uses on housing opportunity sites and implementation of the MU zone, particularly in areas with existing urban agricultural use (VIS-1). However, Plan update policies discussed in Land Use Section 4.1 and in Aesthetics/Visual Resources Section 4.3 would reduce visual character impacts in these areas to less than significant. In addition, the Plan update would result in a beneficial impact to the Mountainous Area by shifting the Urban/Rural boundary and protecting important agricultural lands and rural lands from encroachment and conversion to urban-style development.