COUNTY OF SANTA BARBARA
PLANNING AND DEVELOPMENT
OFFICE OF LONG RANGE PLANNING
MEMORANDUM

TO: Board of Supervisors

FROM: Derek Johnson, Director
Staff Contact: Brian A. Tetley, Senior Planner

DATE: September 3, 2009

RE: Revisions to the Proposed Final Program EIR (08EIR-00000-00004): Finding that State CEQA Guidelines Section 15088.5(b) applies to the Santa Ynez Valley Community Plan, P&D case numbers 09GPA-00000-00001, 09GPA-00000-00002, 09RZN-00000-00007, 09ORD-00000-00010

INTRODUCTION

A Program Environmental Impact Report (08EIR-00000-00004) was prepared for the Santa Ynez Valley Community Plan (SYVCP) to assess potential impacts due to future buildout associated with the Plan and alternatives. There have been subsequent changes to the Plan as a result of public review and comments, and Planning Commission direction. This EIR revision document evaluates Program modifications recommended by the Planning Commission and Board of Supervisors. The EIR Revision also documents minor text changes, amplifications and clarifications to the original project description (08EIR-00000-00004), environmental setting, and impact analysis as a result of decision-maker review and public comment.

CEQA Guidelines Section 15088.5 describes the circumstances under which a lead agency is required to recirculate an EIR when new information is added to the EIR after public notice is given of the availability of the draft EIR for public review, but before EIR certification. According to the Guidelines Section 15088.5(a), "information" can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of meaningful opportunity to comment on new substantial adverse project impacts or feasible mitigation measures or alternatives which the project proponent declines to adopt. Section 15088.5(b) states, "recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications to an adequate EIR".

EIR Revision Findings: It is the finding of the Board of Supervisors that the proposed Final EIR (08EIR-00000-00004), as herein amended by the attached EIR Revision analysis, may be used to fulfill the environmental review requirements for the SYVCP. None of the changes recommended by the Planning Commission or Board of Supervisors would result in any new significant environmental impacts nor would they result in a *substantial increase* in the severity of any environmental impact originally analyzed in the Proposed Final EIR. Hence, pursuant to CEQA Guidelines Section 15088.5(b), the proposed revisions described in this document have not been recirculated. The proposed Final EIR for the SYVCP is hereby amended by this revision document, together identified as (08EIR-00000-00004 RV01).

SANTA YNEZ VALLEY COMMUNITY PLAN

PROPOSED FINAL ENVIRONMENTAL IMPACT REPORT

REVISION LETTER

08EIR-00000-00004

September 3, 2009

Case #09GPA-00000-00001&2/09RZN-00000-00007/09ORD-00000-00010
SCH #2007071093

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I. PROJECT DESCRIPTION

The proposed Santa Ynez Valley Community Plan (SYVCP) sets forth a plan for physical development within the Plan Area comprised of 3,901 assessor's parcels and a total area of approximately 46,933 acres. The SYVCP updates the Comprehensive Plan and provides policy direction for issues and development trends specific to the Plan Area. The SYVCP provides the general public, landowners and decision makers with a framework for planning future development in the region. To analyze the environmental impacts of the SYVCP, the 20-year buildout under the proposed plan was evaluated using standard buildout methodologies.

As reported in the March 2009 Final Environmental Impact Report (Final EIR), the 20-year buildout and rezoning actions under the proposed SYVCP would result in 516 new primary residential units, 132 new residential second units, 24 new agricultural employee units, and 149 new mixed-use residential units, as well as up to 115 additional primary residential units on four Affordable Housing Overlay District (AHOD) sites[1]. This would represent a total of 936 new residential units in the Plan Area. In addition, 20-year buildout conditions would result in 555,334 square feet (s.f.) of new commercial development.

II. BACKGROUND

A Draft Environmental Impact Report (08-EIR-00000-00004, SCH#2007071093) for the SYVCP was released for public review on June 9, 2008. A noticed public comment hearing on the Draft EIR was held on July 9, 2008. The comment period was originally scheduled to close on July 24, 2008 (45 days); however, the County extended the comment period until September 22, 2008 (105 days). In response to public comments, revisions were made and the Proposed Final EIR was released in March 2009, including written responses to comments received on the draft document. In addition to the proposed project, the Proposed Final EIR evaluated four project alternatives, as follows: Alternative 1: No Project Alternative, Alternative 2: Downzone Alternative to Heritage Sites, Alternative 3: Alternative to Design Control (D) Overlay, and Alternative 4: Alternative to Downtown Ballard Zoning.

The Santa Barbara County Planning Commission conducted five hearings on the SYVCP in May and June 2009, and directed staff to consider an alternative to the proposed SYVCP. This alternative is a modified version of the Downzone Alternative that excludes the Affordable Housing Overlay District (hereafter referred to as the Downzone without AHOD Alternative). At a sixth hearing of July 15, 2009, the Planning Commission directed additional changes to the SYVCP, including revisions to the Downzone without AHOD Alternative for two areas included in the downzone

[1] However, the maximum buildout of the AHOD sites was reduced to 76 units with the application of ALUC consistency mitigation measures LU-2.3, as discussed below. The impact analysis in the June 2008 DEIR and March 2009 FEIR conservatively considered a 115 maximum unit count for the AHOD sites.

alternative. The Planning Commission also directed minor changes to the policies, development standards, and item actions of the SYVCP. The impacts associated with the Downzone without AHOD Alternative, as revised by staff in response to Planning Commission direction on July 15, 2009, as well as the other minor Planning Commission-directed changes to the SYVCP are discussed in this EIR Revision Letter. The EIR Revision Letter also provides minor corrections within the Proposed Final EIR and provides clarification regarding certain analyses discussed in the Final EIR. As discussed below in more detail, the minor modifications documented in this EIR Revision Letter do not require recirculation of the EIR pursuant to CEQA Guidelines Section 15088.5(b), as they do not involve substantial increases in impacts or substantially new mitigation strategies and do not deprive the public of a meaningful opportunity to comment.

III. REVISIONS TO THE EIR IMPACT ANALYSIS:

III.A. Analysis of Downzone without AHOD Alternative

The discussion of impacts of the Downzone without AHOD Alternative involves two main components: the elimination of the AHOD development, and changes and clarification to the effect of the Downzone. These components of this alternative are discussed below. The impact analysis for this alternative is provided in Section III.B below.

1. Elimination of the Affordable Housing Overlay District (AHOD)

On June 3, 2009, the Planning Commission directed staff to remove the Land Use and Development Code (LUDC) amendment that would establish an Affordable Housing Overlay Zone and apply this designation to four sites along Highway 246 in the township of Santa Ynez. Substantial public comment and testimony expressing concerns with development of high-density housing on the four AHOD sites was received by Staff and the Planning Commission in three previous hearings. The Affordable Housing Overlay District (AHOD) designates four specific candidate sites, upon which up to 115 units could be constructed as long as 30% of the units (35 units for the 115 unit full development) are developed designated as very low income units[2]. The EIR evaluated

[2] In response to input from staff from the Santa Barbara County Association of Governments Airport Land Use Commission (ALUC), the FEIR included mitigation measures (LU-2.1, LU-2.2, and LU-2.3) to reduce potential land use compatibilities of portions of AHOD Sites A and B that were in the Safety Area 2 (Approach Zone) of the Santa Ynez Valley Airport. Measure LU-2.1 required development proposals on AHOD Sites A and B to be subject to review and approval by the ALUC. Measure LU-2.2 required avigation easements. Measure LU-2.3 proposed a new development standard into the SYVCP that prohibited development of increased residential densities under the Affordable Housing Overlay from being located within the Approach Zone. With the application of LU-2.3, the potential buildout of AHOD Sites A and B was reduced from 65 units to 26 units, and the maximum buildout of all of the AHOD sites in the SYVCP was reduced from 115 units to 76 units. Environmental effects from full development of the AHOD sites would be incrementally reduced due to the lower number of housing units produced under the AHOD program. The ALUC conducted consistency review of the SVYCP on April 16, 2009, and

the impacts of developing these AHOD sites at a project level of detail with separate discussion of the impacts of the AHOD sites development for each issue area. With the removal of the AHOD, no environmental impacts associated with development of these AHOD sites (Sites A through D) would occur, therefore lessening total aggregate impact to environmental resources associated with the SYVCP. Each of the four AHOD sites are currently developed, and any further development or intensification of the sites would be included in the 20-year SYVCP buildout.

In addition, the removal of the AHOD would reduce impacts attributed to buildout in the Plan Area with the elimination of 115 total[3] potential future residential units on the AHOD sites. The residential buildout under the 20-year planning horizon for this alternative would be 690 units, or 26% less than the 936 total residential units for the Initiated Draft SYVCP. This is 14% less (690 units versus 805) residential development than in Alternative 2, the Downzone Alternative that is analyzed in Section 6.2 of the EIR. The amount of commercial development under 20-year buildout conditions would not change with the elimination of the AHOD. A more detailed discussion of the relative impacts of this alternative is provided in Section III.B below.

2. Revisions to the Downzone Alternative's Downzoning for the ETAM and Shepherd Properties

As a result of the Planning Commission's direction at the hearing of July 15, 2009, changes have been made to the proposed rezoning in this alternative to the ETAM and Shepherd properties, as summarized in Table A below. These changes alter the residential buildout calculations for the Downzone without AHOD Alternative. An additional 14 primarily residential units could be developed under this revised alternative due to increased potential land subdivision, and an additional 13 secondary units could be developed due to the change to AG-I zoning, which allows secondary residential units. Assuming conservatively that approximately half of these additional potential residential units are developed under 20-year buildout conditions, this represents a net change of 14 additional residential units (7 primary residential units, and 7 secondary residential units) under this revised alternative.

The residential buildout in the revised Downzone without AHOD Alternative would be 704 units, or 25% less than the 936 total residential units for the Initiated Draft SYVCP. This is 13% less (704 units versus 805) residential development than in Alternative 2, the Downzone Alternative. A summary of the effect of this revision to the Downzone with

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conditionally found the SYVCP consistent with the ALUP with the inclusion of Mitigation Measures LU-2.1, LU-2.2, and LU-2.3. With the consistency review and the finding of conditional consistency, Impact LU-2, Airport-Related Compatibility Conflicts is reduced from Class I (significant and unavoidable) to Class II (less than significant with mitigation) in the proposed project as well as in the four Alternatives presented in the March 2009 FEIR.

[3] As noted above, the total potential units on the AHOD sites is reduced to 76 units with the application of Mitigation Measure LU-2.3; however, the June 2008 DEIR and March 2008 FEIR evaluated a total of 115 units on the AHOD sites.

AHOD Alternative is provided in Table A. An analysis of the revised Downzone without AHOD Alternative is included in Section III B below.

Table A. Changes to Downzoning for the ETAM and Shepherd Properties

APN	Current Zoning	Downzone Alt. Zoning	Revised DZ Alt. Zoning	Acreage	Change in Primary Residential Buildout	Change in Secondary Residential Buildout
ETAM Area						
141-010-009	AG-I-20	AG-II-100	AG-II-40	160.27	3	0
141-010-012	AG-I-20	AG-II-100	AG-II-40	38.55	0	0
141-010-013	AG-I-20	AG-II-100	AG-II-40	58.08	0	0
141-010-014	AG-I-20	AG-II-100	AG-II-40	50.23	0	0
141-041-034	AG-I-20	AG-II-40	AG-I-20	78.8	2	3
141-041-035	AG-I-20	AG-II-40	AG-I-20	20.23	0	1
141-041-037	AG-I-20	AG-II-40	AG-I-20	21.09	0	1
141-070-015	AG-I-20	AG-II-100	AG-I-20	35.48	0	1
141-070-001	AG-I-20	AG-II-100	AG-I-20	66.33	2	3
141-070-002	AG-I-20	AG-II-100	AG-II-40	176.14	3	0
141-070-007	AG-I-20	AG-II-100	AG-II-40	119.11	1	0
Shepherd Property						
141-121-050	AG-I-10	AG-II-100	AG-I-20	80	3	4
Total Change in Residential Unit Buildout Potential vs. Downzone without AHOD Alternative						
					14	**13**
Estimated 20-Year Buildout (50% of Total Buildout Potential)						
					7	**7**

3. Changes and Clarification with Respect to the Effect of Downzoning

The downzoning of properties that are nearest to the townships and other urban areas from AG-I to AG-II would reduce the buildout potential for the Plan Area in comparison to the SYVCP proposed zoning of these parcels. The buildout potential would be reduced through the limiting of further subdivision of certain parcels subject to the downzoning and because Residential Second Units (RSUs), which are allowed in most AG-I zoning districts (with the exception of AG-I-40), are prohibited in AG-II zoning districts. The change in potential for further residential development would result in a reduced number of residential units under 20-year buildout conditions, as the downzoning would be expected to have an effect on the production rate of housing. As depicted in Table C below, the downzoning component of this alternative would result in 104 fewer RSUs, and 13 fewer primary residential units over the 20-year planning horizon.

The downzoning would also create a higher potential for agricultural/urban conflicts in certain cases, as AG-II allows more agriculturally intense uses than AG-I. For example, while keeping of livestock or other large animals is limited to one animal/20,000 s.f. of land in AG-I zoning, there is no such limitation in AG-II. As another example, guest ranches are allowed in the AG-II zoning district with a Conditional Use Permit (CUP) but are not allowed in the AG-I zoning district. There are also differences in the permitting required for certain uses in the different zoning districts, with certain uses such as an equine facility, oil and gas development, and animal hospitals requiring a discretionary CUP in AG-I, whereas the same uses only require a ministerial Land Use Permit (LUP) in AG-II zoning districts[4]. For the permit downshifting presented by the downzoning of properties from AG-I to AG-II as well as for the Proposed Agricultural Permitting Ordinance Amendments, these would involve changes in process for considering certain new agriculturally-related uses, rather than change the type or intensity of the uses allowed. It should also be noted that the Proposed Agricultural Permitting Ordinance Amendments are subject to separate environmental review, such that any environmental effects of this separate program are being evaluated pursuant to CEQA.

The Alternatives discussion included a table comparing trip generation under 20-year buildout conditions in the Downzone Alternative to the Initiation Draft SYVCP (Table 6-13 in the EIR). Table 6-13 contained an error with respect to the number of average daily trips (ADTs) and peak-hour trips (PHTs) from secondary residential units under 20-year buildout conditions for the Initiation Draft SYVCP. Table B below provides the correct data with updated data shaded.

[4] Furthermore, the County is considering permit process changes that would affect AG-I and AG-II zoned properties and would reduce some agricultural-related permit requirements from requiring a Land Use Permit to a Zoning Clearance or exemption, or from a Minor Conditional Use Permit to a Land Use Permit. The proposed ordinance amendment would also increase the floor area threshold for requiring the approval of a Development Plan by the County Planning Commission when the combined floor area of all structures on a lot in an agricultural zone exceeds 20,000 square feet. The project title for these permit process changes is Proposed Agricultural Permitting Ordinance Amendments (Case #09ORD-00000-00009). A Draft Mitigated Negative Declaration for this project was released on May 13, 2009.

Table B. Trip Generation Comparison – Staff Recommended Downzone Alternative vs. Initiation Draft SYVCP – 20 Year Buildout

Scenario	Size	ADT	AM PHT	PM PHT
Down Zone Alternative				
Primary Residential Units	+ 496 Units	4,747	372	501
Secondary Residential Units	+194 Units	1,137	85	101
AH Overlay Sites	+115 Units	674	51	60
Commercial Uses	+555,334 s.f.	18,660	804	1,288
Total		**25,218**	**1,312**	**1,950**
Initiation Draft SYVCP				
Primary Residential Units	+ 516 Units	4,938	387	521
Secondary Residential Units	+ 305 Units	1,787	134	159
AH Overlay Sites	+115 Units	674	51	60
Commercial Uses	+ 555,334 s.f.	18,660	804	1,288
Total		**26,059**	**1,376**	**2,028**
Net Added	**--**	**-841**	**-64**	**-78**

This correction results in a higher number of ADTs and PHTs for the Initiation Draft SYVCP project. Accordingly, the Downzone Alternative would result in additional incremental reductions of traffic congestion, air contaminant emissions, and vehicle noise impacts. Compared to the proposed Initiation Draft SYVCP, the Downzone Alternative would result in 841 fewer ADTs and 78 fewer PM PHTs. This is a correction from the 191 fewer ADTs and 20 fewer PM PHTs that was reported in Section 6, *Alternatives*, of the EIR. The 841 fewer ADTs represent a reduction of about 3.2% fewer ADTs as compared to the 26,059 ADTs generated in the proposed Initiation Draft SYVCP. The 3.2% reduction in vehicle trips would result in: reduced traffic congestion and an associated 3.2% reduction in vehicle exhaust emissions (including GHG gases) and reduced vehicular noise. The incremental reduction in these impacts would further support the conclusion that the Downzone Alternative is environmentally superior to the Initiation Draft SYVCP. The corrections to this table present incremental changes in impacts with no change in the significance or level or impacts presented in the EIR and hence do not deprive the public of a meaningful opportunity to comment.

III.B. Impact Analysis for the Downzone Alternative without AHOD

1. Overview

Table C compares the 20-year buildout of the Plan Area under the Downzone without AHOD Alternative and the 20-year buildout under the Initiation Draft SYVCP. The commercial buildout is the same in both scenarios as the commercial development demand under 20-year buildout conditions would remain the same, but both primary and secondary residential buildout amounts are reduced in this alternative. The medium- to high-density housing on the four AHOD sites would not occur in this alternative. The 20-year buildout under the Downzone without AHOD Alternative would result in approximately 13 fewer primary residential units, approximately 104 fewer secondary

residential units, and 115 unrealized residential units no longer possible without the application of the AHOD, which corresponds to a 25% reduction in residential development under 20-year buildout conditions evaluated in the Initiation Draft SYVCP.

Table C. 20-Year Growth of Downzone without AHOD Alternative vs. the Initiation Draft SYVCP

Land Use	Downzone w/o AHOD Alternative	Initiation Draft SYVCP	Net Difference
Residential Uses			
Additional Primary Residential Units	503	516	-13
Additional Secondary Residential Units	201	305	-104
Additional AHOD Units	0	Up to 115[5]	-115
Total Residential Units	**704**	**936**	**-232**
Non-Residential Uses			
Additional Commercial (sq ft)	555,334	555,334	0

The elimination of the 115 residential units on the AHOD sites would reduce construction and operational impacts in the Santa Ynez township. For the Downzone component of this alternative, the majority of properties proposed for rezoning are in the inner-rural areas of the Plan Area and nearly all involve agriculturally zoned parcels. The reduction in 20-year buildout potential would yield lower future traffic volumes, and therefore also reduce traffic-related environmental impacts such as air emissions and noise. Solid waste demand would be incrementally lower under the Downzone without AHOD Alternative given the overall reduction in residential growth. There would also be a reduction in water and wastewater services demand, and for population-related public services such as police and fire services, school facilities, and parks and recreation.

Other than the change in residential buildout, no policy changes are presented by this alternative. There would be a difference in land use compatibility, as the Downzoning component would allow more intensive agricultural operations for properties where zoning would be changed from AG-I to AG-II. This is discussed in section III.B.5 below under Land Use. For this alternative, the mitigative effect of the proposed policies, development standards, and actions of the SYVCP would not be changed, and no substantial new environmental impacts would result from the Downzone without AHOD Alternative.

[5] As discussed above, the 115-unit count maximum evaluated in the June 2008 DEIR and March 2009 FEIR was decreased to a 76-unit maximum with the application of ALUC staff recommended Mitigation Measure LU-2.3.

As discussed below in more detail, the Downzone without AHOD Alternative avoids two Class I, *significant and unavoidable*, environmental impacts:

- Impact LU-2, Airport-Related Compatibility Conflicts, and
- Impact AQ-1, Clean Air Plan (CAP) Consistency.

These impacts are reduced to Class III, *less than significant without mitigation*, in the Downzone without AHOD Alternative. In addition, several AHOD-site specific, Class II impacts that were identified as resulting from the development of the AHOD sites would be eliminated. These eliminated AHOD-specific Class II impacts include those related to land use compatibility, biological resources, cultural resources, visual resources, traffic, noise, and air quality impacts. Furthermore, impacts in these environmental issue areas that were identified for Plan buildout would be incrementally reduced to the degree that the development of the AHOD sites contributed to these buildout effects. The incremental reduction of several Class I and II impacts in this alternative is due to the 25% reduction in residential development under 20-year buildout conditions. Table D compares the impacts of this alternative to those of the proposed project for each issue studied in the EIR and indicates the classification (I, II, III, and IV) of impacts for each environmental issue area.

Table D. Comparison of Impacts for the Downzone without AHOD Alternative and the Initiation Draft SYVCP Proposed Project

Impact	Comparative Effect on Listed Impact	
	Comparison to Initiated Draft SYVCP	**Impact Classification**
LAND USE		
Impact LU-1: Temporary Construction-Related Compatibility Conflicts	<	Class IV
Impact LU-2: Airport-Related Compatibility Conflicts	<<	Class III
Impact LU-3: Other Long-Term Compatibility Conflicts	>	Class III
Impact LU-4: Cumulative Temporary Construction-Related Compatibility Conflicts	<	Class III
Impact LU-5: Cumulative Airport-Related Compatibility Conflicts	=	Class III
Impact LU-6: Other Cumulative Long-Term Compatibility Conflicts	=	Class III
PARKS AND RECREATION		
Impact PR-1: Increased Demand for Recreational Facilities	<	Class III
Impact PR-2: Adverse Physical Environmental Effects Resulting from Additional Recreational Facilities	=	Class II
Impact PR-3: Cumulative Demand for Additional Recreational Facilities	<	Class III
Impact PR-4: Cumulative Impacts from Proposed Park and Recreation Facilities	=	Class II

Table D. Comparison of Impacts for the Downzone without AHOD Alternative and the Initiation Draft SYVCP Proposed Project

Impact	Comparative Effect on Listed Impact	
	Comparison to Initiated Draft SYVCP	Impact Classification
PUBLIC SERVICES		
Impact PS-1: Fire Protection	<	Class I
Impact PS-2: Police Protection	<	Class III
Impact PS-3: Schools	<	Class III
Impact PS-4: Solid Waste	<	Class I
Impact PS-5: Cumulative Fire Protection Service Impacts	<	Class I
Impact PS-6: Cumulative Police Protection Service Impacts	<	Class III
Impact PS-7: Cumulative Public School Impacts	<	Class III
Impact PS-8: Cumulative Solid Waste Impacts	<	Class I
TRAFFIC AND CIRCULATION		
Impact T-1: 10-Year Buildout Traffic Conditions	<	Class II
Impact T-2: 20-Year Buildout Traffic Conditions	<	Class II
BIOLOGICAL RESOURCES		
Impact BIO-1: Sensitive Habitats	<	Class I
Impact BIO-2: Special-Status Plants	<	Class I
Impact BIO-3: Special-Status Animals	<	Class I
Impact BIO-4: Wildlife Corridors	<	Class I
Impact BIO-5: Cumulative Impacts to Biological Resources	<	Class I
AIR QUALITY		
Impact AQ-1: Clean Air Plan Consistency	<<	Class III
Impact AQ-2: Odor Impacts	=	Class II
Impact AQ-3: Temporary Construction Emissions	<	Class II
Impact AQ-4: Operational Emissions	<	Class I
Impact AQ-5: Cumulative Odor Impacts	=	Class II
Impact AQ-6: Cumulative Temporary Construction Emissions	<	Class II
Impact AQ-7: Greenhouse Gas Emissions/Global Climate Change	<	Not applicable[1]
FIRE HAZARDS		
Impact FH-1: Development within Wildland Fire Hazard Areas	=	Class II
Impact FH-2: Cumulative Impacts from Development within Wildland Fire Hazard Areas	=	Class II
NOISE		
Impact N-1: Temporary Construction Noise	<	Class III
Impact N-2: Exposure to Noise Exceeding County Standards	<	Class II
Impact N-3: Increased Traffic Noise	<	Class I
Impact N-4: Cumulative Temporary Construction Noise	<	Class III
Impact N-5: Cumulative Impacts from Exposure to Unacceptable	<	Class II

Table D. Comparison of Impacts for the Downzone without AHOD Alternative and the Initiation Draft SYVCP Proposed Project

Impact	Comparative Effect on Listed Impact	
	Comparison to Initiated Draft SYVCP	**Impact Classification**
Noise Levels		
Impact N-6: Cumulative Impacts from Increased Traffic Noise	<	Class I
WATER RESOURCES AND WASTEWATER SERVICES		
Impact W/WW-1: Increased Demand from Existing Water Sources	<	Class I
Impact W/WW-2: Increased Wastewater Flows	<	Class I
Impact W/WW-3: Cumulative Water Demand Impacts	<	Class I
Impact W/WW-4: Cumulative Wastewater Impacts	<	Class I
SEISMIC, SOIL, AND LANDSLIDE HAZARDS		
Impact GEO-1: Fault Hazards: Ground Rupture	=	Class IV
Impact GEO-2: Seismically Induced Ground Shaking	<	Class III
Impact GEO-3: Liquefaction, Subsidence, and Other Soil- and Seismic-Related Hazards	<	Class II
Impact GEO-4: Landslides and Slope-Stability Hazards	=	Class III
Impact GEO-5: Cumulative Geologic Hazard Impacts	<	Class III
HYDROLOGY AND WATER QUALITY		
Impact HWQ-1: Temporary Water Quality Impacts	<	Class II
Impact HWQ-2: Long-Term Hydrological Impacts	<	Class III
Impact HWQ-3: Long-Term Water Quality Impacts	<	Class III
Impact HWQ-4: Flood Hazard Impacts	=	Class III
Impact HWQ-5: Dam Inundation Hazards	=	Class III
Impact HWQ-6: Cumulative Temporary Water Quality Impacts	<	Class II
Impact HWQ-7 Cumulative Long-Term Hydrological Impacts	<	Class III
Impact HWQ-8 Cumulative Flood Hazard Impacts	=	Class III
HAZARDS AND HAZARDOUS MATERIALS		
Impact HAZ-1: Hazardous Materials	=	Class III
Impact HAZ-2: Highway-Related Safety Hazards	<	Class III
Impact HAZ-3: Cumulative Hazardous Material Impacts	=	Class III
Impact HAZ-4: Cumulative Highway-Related Safety Hazards Impacts	<	Class III
CULTURAL RESOURCES		
Impact CR-1: Impacts on Significant Historical and Archaeological Resources	<	Class I
Impact CR-2: Cumulative Impacts on Historical and Archaeological Resources	=	Class I
VISUAL AND AESTHETIC RESOURCES		
Impact VIS-1: Visual Character Changes	<	Class I

Table D. Comparison of Impacts for the Downzone without AHOD Alternative and the Initiation Draft SYVCP Proposed Project

Impact	Comparative Effect on Listed Impact	
	Comparison to Initiated Draft SYVCP	**Impact Classification**
Impact VIS-2: Alteration of Scenic Views	<	Class II
Impact VIS-3: Increased Light and Glare	<	Class II
Impact VIS-4: Cumulative Visual Character Impacts	<	Class I
Impact VIS-5: Cumulative Impacts to Scenic Views	<	Class II
Impact VIS-6: Cumulative Light and Glare Impacts	<	Class III
AGRICULTURAL RESOURCES AND OPEN SPACE		
Impact AG-1: Conversion of Agricultural Lands	<	Class I
Impact AG-2: Agricultural/Urban Conflicts	<	Class III
Impact AG-3: Cumulative Conversion of Agricultural Lands	<	Class I
Impact AG-4: Cumulative Agricultural/Urban Conflicts	<	Class III

1 Quantitative GHG-emission related CEQA thresholds have not been established.

= Similar level of effect
< Incrementally reduced level of impact
> Incrementally increased level of impact
<< Substantially reduced level of impact

Class I = Significant and unavoidable
Class II = Significant but mitigable
Class III = Less than significant without mitigation
Class IV = No impact or beneficial

The above table identifies all significant and unavoidable (Class I) impacts, as well as all significant impacts that can be mitigated (Class II) that would occur as a result of adoption of the Downzone without AHOD Alternative. The EIR identified a number of mitigation measures that aim to reduce, avoid, minimize, rectify, eliminate, or compensate for the impacts identified in the EIR to the extent feasible, and these would apply to the Downzone without AHOD Alternative for all impacts that would remain Class II or Class I.

2. Traffic, Air Quality, and Noise

As discussed above and shown below in Table E, fewer vehicle trips would be expected in the Downzone without AHOD Alternative due to the reduced level of residential development. The Downzone without AHOD Alternative would generate 1,407 fewer ADTs than the Initiated Draft SYVCP, which represents a reduction of about 5.4% fewer ADTs as compared to the 26,059 ADTs generated by the Initiation Draft SYVCP. Thus, traffic levels would be incrementally lower under this Alternative. Although the loss of potential future affordable housing development implies a cumulative increase of commuter traffic, this would be a speculative conclusion based on the removal of the AHOD sites. Affordable housing overlays are voluntary: landowners have the option to take advantage of the overly for affordable development. There is only one instance in the County that a landowner has taken advantage of an affordable housing overlay and

actually developed an affordable project. Moreover, based on the "core approach" to housing in the SYVCP, there is adequate stock available for affordable development through the development of residential second units, agricultural employee housing and mixed-use residential units. With the elimination of potential high- and medium-density development on the AHOD sites, there would be less potential traffic generated at the intersections closest to these sites, including the intersections of SR 246/Quail Valley-Marcelino, SR 246/Sienna Way, and SR 246/Refugio Road over the 20-year planning horizon. As with the Initiation Draft SYVCP, impacts to the Los Olivos, Ballard, and Santa Ynez roadway systems, weekend traffic impacts, and impacts associated with buildout of AHOD sites A-D would remain less than significant. In addition, although impacts to the backbone roadway systems would be incrementally lower than under the Initiation Draft SYVCP, all of the significant impacts to the SR 154 and SR 246 corridors that were identified for the proposed project would still occur under the Downzone without AHOD Alternative. All of the mitigation measures recommended for the Initiation Draft SYVCP would apply and, as with the proposed project, implementation of recommended mitigation measures would reduce backbone system impacts to a less than significant level. These impacts would therefore be similar to those of the No Project Alternative, but would remain Class II, *significant but mitigable*.

Table E. Trip Generation Comparison – Downzone without AHOD Alternative

Scenario	Size	ADT	AM PHT	PM PHT
Downzone w/o AHOD Alternative				
Primary Residential Units	+ 503 units	4,814	377	508
Secondary Residential Units	+ 201 units	1,178	88	105
AHOD Sites	0 units	0	0	0
Commercial Uses	+ 555,334 s.f.	18,660	804	1,288
Total		**24,652**	**1,269**	**1,901**
SYVCP				
Primary Residential Units	+ 516 units	4,938	387	521
Secondary Residential Units	+ 305 units	1,787	134	159
AHOD Sites	+ 115 units	674	51	60
Commercial Uses	+ 555,334 s.f.	18,660	804	1,288
Total		**26,059**	**1,376**	**2,028**
Net Reduction in Downzone without AHOD Alternative		**- 1,407**	**- 107**	**- 127**

Based on 20-Year Buildout conditions

Air pollutant emissions, including GHG emissions, associated with the Downzone without AHOD Alternative would be reduced commensurately with the reduction in vehicular traffic. The 25% reduction in new residences (from 936 to 704 new residences) under 20-year buildout conditions, and the resultant 5.4% reduction in traffic volumes (ADTs), would result in an approximately 5.4% reduction in GHG emissions. This represents a decrease of approximately 4,198 metric tons per year in carbon dioxide equivalency units under 20-year buildout conditions. The Downzone without AHOD Alternative would also include the energy efficiency and GHG emission reduction policies, development standards, and mitigation measures geared towards compliance

with AB 32 and SB 375 that are in the proposed SYVCP. Therefore, this alternative would provide similar mechanisms to reduce GHG emissions and impacts on global climate change. Overall, given that mobile source emissions comprise the majority (88%) of GHG emissions, the reduction in ADTs in the Downzone without AHOD Alternative would result in decreased GHG emissions and global climate change impacts in comparison with the Initiation Draft SYVCP.

Construction and odor impacts would also be similar to those of the Initiation Draft SYVCP and, with mitigation recommended for the Initiation Draft SYVCP, would be significant, but mitigable (Class II). While the Class II temporary construction impacts with respect to the development of the AHOD sites would be avoided, as these sites would not be developed with medium- and high-density housing, mitigation would still be required for other future development associated with 20-year buildout.

With respect to CAP consistency, the 25% reduction in new residences would address the inconsistency with CAP population forecasts identified for the proposed project. Impact AQ-1, the significant and unavoidable (Class I) Air Quality impact related to CAP Consistency, would be eliminated, as the reduction in residential growth in this alternative would result in a population increase that is less than the 1,988 person increase projected for the 20-year buildout under the existing Comprehensive Plan. The Downzone without AHOD Alternative has a 20-year population growth forecast of 1,984 residents, which is within existing forecasts. Hence, there would be no impact with respect to consistency of this alternative with the CAP, and impacts would be less than significant without mitigation. Retention of Mitigation Measure AQ-1.1, however, is recommended as a greenhouse gas reduction measure.

It should be noted that the AHOD sites were selected along a transit corridor in part to reduce per unit trip generation rates and reduce ADTs and vehicle miles traveled (VMT) because of the sites' proximity to transit services and other alternative transportation modes. However, the elimination of the opportunity for development of the AHOD sites for medium- and high-density development is not expected to result in an associated increase in numbers of new residential units (primary and more affordable secondary units) elsewhere in the Plan Area. The projected 20-year residential buildout of the Plan Area is based on historical residential housing projection rates and did not assume that a certain portion of the 20-year buildout would be accommodated by the development of AHOD sites. The EIR evaluated the full 115-unit buildout of these sites as a reasonable worst case development scenario, while recognizing that all four sites may not seek the application of the AHOD overlay. Hence the elimination of the AHOD sites for up to 115 medium- to high-density housing units does not result in the need to accommodate these 115 units elsewhere in the Plan Area. On the other hand, the reduction in primary and secondary residential development projected to result from the downzoning component of this alternative would be expected to lead to a reduction in the 20-year residential buildout (as reported in Table C), since the rate of housing production would be expected to decrease in proportion to the decrease in residential potential of the downzoned parcels.

The 25% reduction in new residences under the Downzone without AHOD Alternative and associated 5.4% reduction in overall traffic generation would incrementally reduce potential exposure to excessive noise as well as the increase in temporary construction noise and long-term traffic noise. While the removal of the AHOD would avoid the AHOD development-specific Class II noise exposure impacts, additional residences in areas subject to higher noise levels would still potentially be exposed to noise exceeding County standards. In addition, traffic noise increases would remain significant along portions of SR 154 and SR 246 as the reduction in noise level change would be less than 0.1 dB as compared to what would occur under the proposed project. Therefore, all of the segments that would experience an increase of greater than 1.5 dB would also experience an increase of greater than 1.5 dB under this alternative. Similar to the proposed project, construction-related noise impacts would be less than significant (Class III). Mitigation measures recommended for the proposed project to address exposure to excessive noise would apply and would reduce impacts to a less than significant level. These measures would also address impacts relating to traffic noise increases to the degree feasible. However, as with the proposed project, the increase in traffic noise along SR 154 and SR 246 would remain significant and unavoidable (Class I) and would be similar to the No Project Alternative.

3. Water, Wastewater, and Solid Waste

Overall, this alternative would generate slightly less solid waste, water demand, and wastewater than the proposed project, given the slightly lower residential buildout amounts. Tables F through H show estimated solid waste generation, water demand, and wastewater generation at buildout of the Downzone without AHOD Alternative. Solid waste generation would be about 304 tons/year (18%) lower under this alternative than under the proposed project. With the elimination of the AHOD medium- and high-density housing, overall Plan Area water demand would be reduced by 12.1 acre-feet per year (AFY) (refer to Table 4.9-15), in addition to the reduction of 20 AFY calculated for the downzoning component of this alternative. Overall, as compared to the Initiation Draft SYVCP, Plan Area water demand would be reduced by approximately 32 AFY (0.46%).

Wastewater generation would be reduced by about 47,000 gallons per day (gpd) (1.2%). As such, impacts relating to water demand, and solid waste and wastewater generation would be incrementally lower than those of the proposed project.

Table F. Solid Waste Generation at 20-Year Buildout of the Downzone without AHOD Alternative

Land Use	Solid Waste Generation Rate	Solid Waste Generated Per Land Use	Total Solid Waste Generation Increase at 20-Year Buildout	Solid Waste Generation With 50% Reduction	County Threshold Exceedance with Solid Waste Reduction?
Residential Units 704	2.76 Persons/ unit[1] X .95 tons/ person/ year[2]	1,846 tons/ year	2,776 Tons/ year	1,388 Tons/ year	Yes
Commercial Sq/Ft. 520,003	1 Employee/ 585 sq/ft.[3] and 5.4 lbs/ person/ day[4]	930 tons/ year			

1 California Department of Finance, 2007
2 County of Santa Barbara Environmental Thresholds and Guidelines Manual, Section 15-1
3 Southern California Association of Governments, "Median and Average Employment Density Factors", 2002
4 California Integrated Waste Management Board, 2008. http://www.ciwmb.ca.gov/Profiles/Juris/JurProfile1.asp?RG=R&JURID=620&JUR=Santa+Barbara+Regional+Integrated+ Waste+Mgmgt%2E+Reporting+Authority

Table G. Estimated Water Demand at Buildout of Downzone without AHOD Alternative

Land Use	SYVCP Buildout Units	WDF (AFY/Unit)	Estimated Demand (AFY)
Ag Employee	7,264(1)	0.14	1,017
Primary Residential	4,587 (1, 4)	0.98	4,495
Residential Second Unit	3,202 (1, 4)	0.14	448
C2/MU Residential	586(1)	0.14	82
Commercial	4,288,088(2) ft^2 (197 ac) (3)	1.64 (AFY/acre)	323
Estimated Total Water Demand (AFY)			**6,365**

Notes:
(1) Per SB County Buildout Table 3 (Residential Buildout Under the Proposed SYVCP) transmitted via email on March 21, 2008 minus the unit reductions shown in Table 6-11 adjusted for the elimination of the AHOD sites.
(2) Per SB County Buildout Table 4 (Commercial Buildout Under the Proposed SYVCP) transmitted via email on March 21, 2008. Figure does not include C-2 residential component.
(3) Assumes 50% of each site is developed.
(4) Buildout as further revised per Planning Commission direction on July 15, 2009.

Table H. Estimated Wastewater Flows at Buildout of Downzone without AHOD Alternative

Source	Units	Duty Factor	Wastewater Flow (gpd)
Residential	15,524 Units	215 gpd/unit	3,338,000
Commercial	4,288,088 SF	0.056 gpd/SF	240,000
Total			**3,578,000**

Wastewater impacts would also be incrementally decreased with the lower amount of potential residential development on the sites proposed for downzoning that are also designated Special Problem Areas. In particular, this condition would result for the area west of Santa Ynez township north of Highway 246 and west of Highway 154 and also for the area north of Highway 154 north of Los Olivos. However, other areas of the Plan Area that have septic system constraints would not be affected by this overlay. Buildout in these other areas would remain similar in this alternative such that significant impacts related to increased wastewater flows to substandard onsite sewage treatment systems would remain for this alternative.

All of the solid waste, water, and wastewater mitigation measures recommended for the Initiation Draft SYVCP would also apply to the Downzone without AHOD Alternative and would reduce impacts to the degree feasible. However, as with the Initiation Draft SYVCP, the increase in Plan Area solid waste generation would remain above the County's threshold. In addition, as discussed in Section 4.9, *Water Resources and Wastewater Services* of the EIR, the development of needed water and wastewater infrastructure upgrades may be infeasible. Therefore, although both water and wastewater impacts would be incrementally reduced in this alternative in comparison to the proposed Initiation Draft SYVCP, they would remain significant and unavoidable (Class I) (see Table D).

4. Other Public Services

Due to the 25% reduction in new residential development and associated reduction in student generation and demand for parkland and police and fire protection, this alternative would result in reduced impacts to schools, parks/recreation, and police/fire when compared to the proposed project. The 232-unit reduction under 20-year buildout conditions would result in a reduction in buildout population of 640 persons. School, parks/recreation, and police protection demand impacts were not found to be significant for the SYVCP and would also be less than significant (Class III) for the Downzone without AHOD Alternative. Impacts relating to demand for fire protection were determined to be Class I due to the need for a new fire station serving the Los Olivos area. The lower 20-year buildout population in the Downzone without AHOD Alternative would incrementally reduce the severity of this impact and mitigation recommended for the Initiation Draft SYVCP would apply. However, as with the

Initiation Draft SYVCP, available feasible mitigation measures would not reduce the impact relating to fire protection to a less than significant level. This impact would remain significant and unavoidable (Class I) under the Downzone without AHOD Alternative (see Table D).

5. Land Use, Agricultural Resources, Biological Resources, Cultural Resources, and Aesthetics

Potential impacts to aesthetics, biological resources, cultural resources, and certain land use compatibility issues would be incrementally reduced under this alternative due to the reduction in ground disturbance and structural development associated with the 232-unit (25%) reduction in new residential development within the Plan Area. In addition, all of the impacts identified for the development of the AHOD sites would be eliminated, as the medium- and high-density housing associated with the AHOD would not be developed.

Notably, the Class I Land Use impact related to Airport-Related Compatibility Conflicts (LU-2) would be eliminated as high-density housing on portions of AHOD Sites A and B that are within the Flight Hazard Approach Zone would no longer be proposed. Mitigation Measures LU-2.1, LU-2.2, and LU-2.3 would no longer be required with this alternative, as impacts would be less than significant without mitigation with the elimination of the AHOD. In addition, temporary construction-related land use compatibility conflicts would be incrementally reduced, with the reduction in overall residential development.

Potential long-term land use conflicts with surrounding development would be reduced for the AHOD sites with the elimination of the AHOD. However, agricultural/urban conflicts would be incrementally increased for properties subject to downzoning from AG-I to AG-II. The downzoning of properties that are nearest the townships and other urban areas from AG-I to AG-II would create a higher potential for agricultural/urban conflicts in certain cases, as AG-II allows more agriculturally intense uses than AG-I. Adherence to all applicable zoning ordinance development standards and the mitigative policies, standards, and actions of the SYVCP would serve to reduce these potential programmatic agricultural/urban land use conflicts, and such conflicts would not constitute significant environmental impacts. Development projects in the urban/rural interface are analyzed for potential conflicts and are conditioned to include appropriate buffers and other methods to minimize land use conflicts on an individual basis. There are also practical agricultural considerations such as potential for neighbor complaints, livestock harassment, and crop yield reductions from theft that would be expected to limit intensive agricultural operations near urban areas and would encourage the implementation of buffers and vegetative or other physical screening and security measures to help avoid or minimize land use conflicts.

As noted above, the AHOD-site specific impacts would be eliminated in this alternative. Several Class II, *significant but mitigable*, impacts would be avoided. Impact BIO-1(D), Impacts to Sensitive Habitats: Site D, which identified Class II impacts on a natural

drainage crossing the site would be avoided, and mitigation measure BIO-1.2 would not be needed. Impacts BIO-2(C) and BIO-2(D), which pertain to potential impacts to special status plant species on AHOD sites C and D, would similarly be avoided. Impacts BIO-3(A) through BIO-3(D), which pertain to potential impacts to protected bat and bird species, would be avoided, as the residential development anticipated under the AHOD would not occur. The associated mitigation measure for this impact, Measure BIO-3.2, would no longer be necessary.

The potential impacts to significant historical and archaeological resources identified for the development of the AHOD sites [Impacts CR-1(A) through CR-1(D)] would be avoided in this alternative, and Mitigation Measure CR-1.5 would not be required. The Class II impacts related to Visual Character Changes on AHOD Sites A through D [Impacts VIS-1(A) through VIS-1(D)] would be avoided in this alternative, and Mitigation Measures VIS-1.4 through VIS-1.7 would not be required.

All of the other mitigation measures recommended for the Initiation Draft SYVCP to address impacts relating to visual and aesthetic resources, agricultural resources, biological resources, and cultural resources would apply to this alternative. While impacts associated with the 20-year buildout of the SYVCP would be incrementally reduced, none of these impacts that were determined to be significant and unavoidable (Class I) would be reduced to a less than significant level under this alternative (see Table D).

6. Fire, Flooding, Seismic, and Geologic Hazards and Hazardous Materials Issues

Potential impacts related to exposure to fire, flooding, seismic, geologic, and hazards materials would be incrementally reduced in this alternative, since about 25% fewer new residents would be exposed to such hazards. However, no changes to the level of significance of impacts identified in the analysis of the Initiation Draft SYVCP would be expected. Similar to the Initiation Draft SYVCP, potentially significant impacts would occur with respect to fire hazards, seismic and geologic hazards, and hydrology/water quality. All of the mitigation measures recommended for the Initiation Draft SYVCP would apply and would reduce impacts for each of these issues to a less than significant level (see Table D).

7. Achievement of Proposed Objectives

This alternative meets several but not all of the basic objectives of the proposed SYVCP, notably: direction of growth including mixed use growth into the townships and refinement of policies, actions, and development standards to maximize the preservation of environmental resources. On the other hand, in comparison to the Initiation Draft SYVCP, this alternative would not provide the same level of housing, including more affordable housing through the AHOD, farm employee units, or residential secondary

units. Consequently, it would not provide the same level of achievement of housing needs and objectives as is achieved in the Initiation Draft SYVCP.

III.C. Planning Commission Directed Revisions

Several specific Planning Commission-directed revisions to the Initiation Draft SYVCP text are presented to provide minor clarifications within the Proposed Final EIR, as indicated below.

1. Revisions to the Mixed-Use Overlay

The Planning Commission directed that the Mixed-Use Overlay be revised to exclude a specific requirement that 25% of the residential units built under this overlay be rented to very low and low income households. The Planning Commission also directed that this overlay contain a prohibition on drive-through facilities. The first of these revisions presents no significant new environmental impacts, as the change was seen as necessary to remove an unintended constraint on new mixed use development, and the EIR assumed that the Mixed Use Overlay would result in the production of additional residential and commercial development. Existing countywide affordable housing programs described in the Housing Element of the Comprehensive General Plan would still apply to future residential development within the Mixed Use Overlay sites. The prohibition on drive-through facilities would be expected to result in minor land use compatibility improvements and a minor reduction in potential conflicts between vehicles in the downtown areas and pedestrians and bicyclists. It would also be expected to have minor, insignificant changes in air emissions, as the elimination of the potential for idling vehicles in the drive-through line, which would reduce the CO_2 and other GHGs from idling vehicles, but would be expected to lead to slightly higher NOx and ROC emissions from facility patrons from an increase in cold-starts of patron vehicles. It should also be noted that there currently are very few drive-through facilities in the unincorporated Santa Ynez Valley (Rabobank in Santa Ynez is one example).

2. Revisions to the Trails Map and Inclusion of an Action Item Supporting a River Trail

The Initiation Draft SYVCP included a revised Parks, Recreation, and Trail Map for the Plan Area (PRT-4) that removed several of the planned trails shown on the previous version of PRT-4, which was last revised in 1988. The Initiation Draft SYVCP PRT-4 map was included in the EIR as Figure 4.2-1. The Planning Commission directed that the 1988 version of the PRT-4 map be restored in the SYVCP which would provide for the potential future development of these trails as depicted on the map.

Section 4.2 of the EIR would be changed as follows:

- Revise Figure 4.2-1 to include the 1998 version of the PRT-4 map. The revised Figure 4.2-1 is included as an attachment to this revision letter.

- Revise the first part of the second paragraph of the Trails Setting as follows:

  The Comprehensive Plan provides a Parks, Recreation, and Trails Map (PRT-4) that was last revised in 1988. Comprehensive Plan policy PRT-4 identified both existing and proposed trail corridors throughout the Santa Ynez Valley. Figure 4.2-1 illustrates the adopted ~~a revised~~ trails map ~~to reflect the current conditions and status of existing trails in the Valley~~.

- Revise the second paragraph of *Other Applicable Community Plan Policies, Programs, and Standards* in the discussion of Impact PR-1 as follows, and reclassify this impact from Class III to No Impact the Executive Summary's Summary of Impacts and Mitigation Measures:

  The Community Plan proposes ~~an update~~ to maintain the Santa Ynez Valley Area Parks, Recreation and Trails Map (PRT-4), as illustrated on Figure 4.2-1 above. Under the proposed Plan a number of trail and bike lane alignments are designated for future construction. The Plan further includes several policies and development standards, discussed below under impact PR-2, that would ensure that impacts on habitat and other resources are minimized during the construction of new trail and bike-lane alignments. ~~The updated Trails map eliminates certain trail segments shown on the existing PRT-4 map in the Comprehensive Plan, as future construction of these trail segments has been determined to be infeasible, but would not adversely affect any existing trails.~~ In addition, the designation of ~~new~~ trails and bikeways would ensure that adequate trail and bikeway recreational opportunities are available to Plan Area residents. No impacts would result. ~~The impact related to the change in the trails map is less than significant (Class III).~~

The restoration of the 1988 PRT-4 map in the SYVCP does not result in any additional environmental impacts, as these trails are designated on the currently adopted PRT-4 map. The effect of the SYVCP adoption would be to maintain what is already contained in the existing Comprehensive General Plan. As new trail segments are developed, these would adhere to the SYVCP's Trail Siting Guidelines, and hence no new significant environmental impacts would be expected related to trail construction and operation.

The Planning Commission also directed that Policy PRT-SYV-1 be revised to allow private property to be considered when siting new recreational facilities and trails and that a new action item be added to the SYVCP supporting the development of a trail along the Santa Ynez River. These revisions are consistent with the 1988 PRT-4 map and would be governed by the guidance on impact avoidance and minimization in the Trail Siting Guidelines of the SYVCP. The potential development of a river trail is a future action item, for which no details are available. Hence, the specific environmental effects of the development of this trail are too speculative to determine at this time, and are therefore not addressed here or in the proposed Final EIR pursuant to CEQA Guidelines §15145. Future development of a Santa Ynez River trail would need to be accompanied by an environmental review document tailored for the project.

3. Revisions to Farmstays Policy

The Planning Commission directed that a minor revision to Policy LUA-SYV-4.1 be made, to provide for less directive language in developing an ordinance that allows agricultural farmstays. The revision would reduce the certainty that farmstays would be allowed in the future, and should farmstays not be allowed, the potential impacts with respect to conversion of agricultural lands would be reduced. This minor revision to Policy LUA-SYV-4.1 would not result in any new environmental impacts, nor would it change any of the conclusions of the EIR.

4. Inclusion of a Historic Resources List as an Appendix

The Planning Commission directed that the SYVCP include a list of known historical resources and buildings as an appendix to the Plan and include a new action item to refine and update this list prior to inclusion as an appendix. The inclusion of this list would be for informational purposes, and does not result in any new or changed environmental impacts of the Plan. Rather, this action would serve to complement and support new Action HA-SYV-2.3 which was proposed in Mitigation Measure CR-1.2 of the EIR.

5. Guidance for Future Wine Tasting Rooms

The Planning Commission directed that the SYVCP include a new action item that considers the effect of wine tasting rooms on the community and considers the development of certain restrictions on the development of additional wine tasting facilities in the Plan Area. This revision would set forth a future action, which would not result in any new environmental impacts. Rather, it may result in certain socio-economic changes that would not relate to physical changes and are therefore outside the scope of CEQA and this EIR.

6. Revisions to Setbacks for Riparian Corridors

The Initiation Draft SYVCP included DevStd BIO-SYV-4.1 that prescribed a minimum riparian corridor setback of 25 feet from the edge of riparian vegetation or the top of bank, whichever is more protective, for the urban and inner-rural areas of the SYVCP. The Planning Commission directed that this minimum be increased to 50 feet for the urban and rural areas.

The stated mitigative policies as listed in Section 4.5 of the EIR would be changed as follows.

Revise DevStd BIO-SYV-4.1 as follows:

> *DevStd BIO-SYV-4.1: Development shall include a minimum setback of ~~25~~ 50 feet in the Urban and Inner-rural areas, 100 feet in the Rural areas, and 200 feet from the Santa Ynez River, from the edge of riparian vegetation or the top of bank whichever is more protective. The setbacks may be adjusted upward or downward on a case-by-case basis depending upon site-specific conditions such as slopes, biological resources and erosion potential.*

This change would have the effect of providing a wider buffer for development along creeks and other riparian corridors in the Plan Area in many cases. The development standard would still allow for the upward or downward adjustment of the setback depending on site-specific conditions. Increasing the buffer in this development standard would provide more protection to sensitive biological resources that are associated with riparian habitat. It would also provide for incrementally better water quality and flood hazard protection with the provision of a wider area for filtration of sedimentation and other contaminants along watercourses. Agricultural production would not be impacted since the overlay applies only to development, whereas standard agricultural production and grading activities are not considered development and are exempted from Chapter 14 (Grading Ordinance) of the County Code. This revision would not result in any new environmental impacts, and the reduced impact to sensitive biological resources would not result in the elimination of any of the significant and unavoidable impacts identified in the EIR.

7. Modification of the EDRN Definition

The Planning Commission directed that the definition of EDRN in the Land Use Element be modified to permit zone changes in EDRNs when allowed by a Community Plan. The Planning Commission directed that Policy SYV-LUA-5.0 be added to the SYVCP. Policy SYV-LUA-5.0 states: "EDRNs may be rezoned to lower densities within the planning area." This Policy would have the effect of allowing for downzones in the EDRNs of the Plan Area. The inclusion of this policy does not result in any new or changed environmental impacts of the Plan. Rather, this policy may result in rezoning actions that further reduce residential buildout of the Plan Area and would have incrementally lower environmental effects related to construction impacts, resource use, and population-related impacts.

8. Revisions to DevStd LUT-SYV-5.2 and DevStd LUT-SYV-5.3

The Planning Commission directed staff to work with the appropriate property owners along Highway 246 to revise DevStds LUT-SYV-5.2 and LUT-SYV-5.3, which pertain to maintenance of landscaped buffer areas and setbacks for structural development along certain segments of Highway 246 and Highway 154. In accordance with this direction, these development standards have been revised as follows:

DevStd LUT-SYV-5.2

It is the intent of the following standards to preserve, and where possible enhance, the public viewshed in community gateways while allowing for pedestrian-oriented mixed use and commercial development to occur on parcels zoned C-2 or C-2/MU in an architectural vernacular compatible with the established Township.

a. New structural development on parcels along ~~both sides of~~ Highway 246 between Meadowvale Road and Cuesta Street in the Santa Ynez Township shall be set back a minimum of 35 feet from the edge of the highway right of way unless it precludes reasonable development.

In the interest of good design, reduced setbacks ~~are~~ may be warranted. Reductions in setback ~~can~~ may be allowed if it can be demonstrated to the Board of Architectural Review and/or Review Authority that a development project meets all of the following standards:

1. Compliance with all applicable visual resource policies and standards.
2. Project's architectural and landscape design minimizes impacts to public views.
3. Encroachments are screened from public view utilizing landscaping. Structures are designed and sited so as to be compatible with proposed landscape materials and design character of the community.
4. Structures fronting on other streets, but visible from the highway, must not present a blank facade for public view; i.e., must possess enhanced design features on all visible sides. Examples of enhanced design features include articulation of wall planes, varied rooflines and roof pitches, as well as varied building heights and details consistent with the local architectural vernacular.

b. New structural development on parcels along ~~both sides of~~ Highway 154 between Foxen Canyon Road and Alamo Pintado Avenue in Los Olivos shall be set back a minimum of 35 feet from the edge of the highway right of way unless it precludes reasonable development.

In the interest of good design, reduced setbacks may be warranted. Reductions in setback may be allowed by the Board of Architectural Review and/or Review Authority ~~may approve reduced setbacks~~.

DevStd LUT-SYV-5.3: New development on parcels along ~~both sides of~~ Highway 246 between Meadowvale Road and Cuesta Street in the Santa Ynez Township and along ~~both sides of~~Highway 154 between Foxen Canyon Road and Alamo Pintado Avenue in Los Olivos shall provide and maintain a landscape buffer area 30 feet in width from the edge of the Highway 246 and Highway 154 rights-of-way. Due to the width of Railway Avenue and the abandoned railroad right-of-way in Los Olivos, property abutting

Railway Avenue shall have a buffer area of 20 feet in width from the edge of the Highway 154 right-of-way. Landscaping shall be with drought tolerant, native species and include at least one native oak tree for every 30 feet of Highway frontage, unless it precludes reasonable development. Reductions in buffer areas may be allowed by the Board of Architectural Review and/or Review Authority.

These revisions provide additional flexibility in design and further provide assurance that reasonable development is not precluded. Any reductions in setback or landscape buffer would need to be in the interest of good design and reviewed and approved by the Board of Architectural Review and/or Review Authority. These development standards were noted as being mitigative in nature with respect to potential visual and aesthetic impacts. The review requirements in the revised development standards would maintain the mitigative effect of these standards and ensure that visual impacts are avoided. Hence, these revisions would not result in new or increased environmental impacts.

9. Minor Policy Language Changes and Additions: Action VIS-SYV-1.6, Action SYV-4.1, Action LUT-SYV-5.4, and DevStd LUT-SYV-3.1

The Planning Commission directed the inclusion of a new action item (Action VIS-SYV-1.6) and minor language changes to two other action items and one development standard as follows:

> *Action VIS-SYV-1.6: The County and the community should consider the application of scenic roadway standards for portions of planning area roadways including the portion of Santa Rosa Road within the planning area.*
>
> *Action LUA-SYV-4.1: The County shall consider ~~develop~~ an ordinance allowing agricultural farmstays in the Santa Ynez Valley in accordance with Health and Safety code Section 113870~~. Farmstays will be permitted~~ where compatible with on-site and neighboring agricultural production.*
>
> *Action LUT-SYV-5.4:* The County shall work with the community to develop and adopt township-specific design guidelines, including signage and lighting, that may be used by P&D and the BAR in approving future development in the townships.
>
> *DevStd LUT-SYV-3.1: Rooftop and ground mounted mechanical structures (e.g., vents, air conditioning, back flow devices, electrical/cable boxes, etc.) shall be minimized to the maximum extent feasible. Where they cannot be avoided altogether, they shall be shielded from view from surrounding roadways and residences through architectural design, camouflage housing, landscape screening, or other appropriate methods.*

The new Action VIS-SYV-1.6 would set forth a future action, which would not result in any new environmental impacts. Rather, this action would serve to complement the

mitigative effects of the D-Design Control Overlay and Heritage Sites Overlay as these relate to preservation of scenic viewsheds. The revision to Action LUA-SYV-4.1 consists of minor clarifications that do not substantially change the mitigative effect of this action item or present any new environmental impacts. The revision to Action LUT-SYV-5.4 provides assurance that signage and lighting will be addressed in the development of township-specific design guidelines. This clarifying text does not present any new environmental impacts. Similarly, the revision to DevStd LUT-SYV-3.1 provides minor clarifying text, which does not present and new environmental impacts.

10. Amendment to the D-Design Overlay Map

The Planning Commission directed amendments to the SYVCP Overlays Map to apply the D-Design Overlay to additional areas along roadways in the Plan Area. The D-Design Overlay is amended to include areas along Alamo Pintado Road and Grand Avenue northward from Roblar Avenue to the commercial core of Los Olivos and all parcels along Highway 246 between the City of Solvang and the commercial core of Santa Ynez. The effect of this change would be to subject additional development along these roadways to review by the Central County BAR under the provisions of the D-Design Overlay. This would provide for additional protection of aesthetics and maintenance of scenic corridors under this overlay. This change would not present any new environmental impacts. Agricultural production would not be impacted since the overlay applies only to structures, not agricultural production or grading activities. In addition, agricultural structures under 1,000 square feet in area are explicitly exempted. The overlay would have the effect of incrementally decreasing visual and aesthetic impacts over that analyzed for the D-Design overlay in Section 4.14, Visual and Aesthetic Resources.

III.D. Other Revisions and Clarifications to the EIR

Several staff-recommended changes to the EIR text are presented to provide minor clarifications to the Proposed Final EIR, as indicated below.

1. Additional Clarification on Residential Second Unit Production Rate

During the Planning Commission hearings on the SYVCP and the EIR, clarification regarding the projected 20-year buildout of RSUs was requested. The production rate of RSUs was determined using the same methodology that was used to derive primary residential growth. The historical production rates of both of these kinds of residential development was analyzed using County building permit history over a five-year period from 2002 to 2007. The methodology and data on housing production is provided in Tables 2-1 and 2-2 in the EIR. The existing number of RSUs in the Plan Area is not reported because permit history for these second units was determined to not be reliable enough to represent an accurate baseline. However, since the EIR evaluates 20-year buildout, an accurate estimation of future growth of RSUs over the buildout period could be compiled using the 2002 to 2007 housing production data.

This information provides minor clarification to the discussion of the EIR and does not present any new significant environmental impacts or change the analysis in the EIR.

2. Additional Clarification on Response to Comment 24.4

Item 4 of comment letter #24 pointed out a difference in buildout capacity of a specific property derived from a discrepancy on the subject property between number of legal lots and number of assessor parcel numbers (APNs). In this case, the commenter states that the subject property, the ETAM property, is comprised of nine legal lots and that the buildout potential in the EIR, which analyzed APNs, overstates the existing subdivision potential by 7 to 9 units. The commenter asserts that using APN data and not an analysis of legal lots is flawed and requests that the buildout analysis be redone using legal lot data. A similar statement on the need to analyze legal lots rather than APNs was made during the Planning Commission hearings on the Draft SYVCP and EIR.

In response to these comments and assertions, the following clarification for Comment 24.4 is provided.

Revise Response 24.4 in Section 9.0, Response to Comments on the Draft EIR section to read as follows:

Response 24.4
The commenter requests the removal of nine specific parcels from the Heritage Sites Overlay and states an opinion that these parcels do not meet the draft Community Plan's stated criteria for inclusion in this overlay designation. The commenter states that the subject property, the ETAM property, is comprised of nine legal lots and that the buildout potential in the EIR, which analyzed APNs overstates the existing subdivision potential by 7 to 9 units. The commenter asserts that using APN data and not an analysis of legal lots is flawed and requests that the buildout analysis be redone using legal lot data. This minor change (<0.3%) to the projected theoretical buildout potential resulted in a smaller change to the programmatic 20-year buildout potential, and does not substantially change the conclusions of the EIR relative to the 20-year buildout of the Plan Area.

In addition, contrary to the commenter's assertion, the use of APN data for buildout analyses at the programmatic level is a commonly employed methodology. While in some cases the use of APN data rather than data on legal lots may result in an overestimation of buildout potential, as the commenter points out in the specific instance of the ETAM property, in other cases, there are multiple APNs on a given legal lot, which would result in the opposite effect on resultant buildout estimates. While APN data is readily available, the use of legal lot data would require detailed analyses of County Surveyor files that is beyond the scope of the EIR's programmatic buildout analysis. To obtain such data, long

term and detailed lot-by-lot investigations would have needed to be conducted, which would unnecessarily delay the SYVCP without adding a discernable degree of certainty, accuracy, or utility. As stated in CEQA Guidelines Section 15151 "sufficiency of an EIR is to be reviewed in the light of what is reasonably possible." Further, such an exercise could require that the County engage in determinations of the legality of existing lots; such analysis of private property legal rights is clearly not required by CEQA in determining the appropriate baseline. Fat v. County of Sacramento *(2002) 97 Cal. App.4th 1270,1277-1280. The EIR's use of APN data for buildout analysis provides a reasonable and feasible approach, one that is consistent with accepted methodologies for calculating buildout at the programmatic level.*

The request to remove these nine lots from the Heritage Sites Overlay is for a change to the draft Community Plan, which is under the discretion of County decision-makers rather than a precondition for EIR accuracy or sufficiency ~~and is not about the DEIR~~. Please see Response 24.1 as it relates to a subset of these nine parcels. In addition, please note that the recommended changes to the Heritage Sites Overlay will be forwarded to County decision-makers for their consideration.

3. Clarification on Table 4.4-33 Existing + Project Intersection Operations – AHOD Site C

During the Planning Commission hearings on the SYVCP and EIR, a commenter questioned the conclusion in this table for the reported data on intersection operations at the Highway 246/Sienna Way intersection. The table reports a reduction in average wait times for this intersection during the P.M. Peak Hour, such that the wait times go from 15.1 seconds under Existing conditions to 14.3 seconds under Existing + Project conditions.

Consistent with County policies, levels of service were calculated for unsignalized intersections using the methodology outlined in Highway Capacity Manual (HCM), Highway Research Board Special Report 209, Transportation Research Board, National Research Council, 2000. The average delay for movements required to stop or yield at the intersection is calculated in order to determine the intersection's ability to accommodate movements to and from the side street. This method helps to identify instances where the side street movements are delayed to a point where driver frustration begins to set in and/or alternative traffic controls may be necessary (all-way stop, signal, etc.).

The HCM method can result in a reduction in the average delay per vehicle when traffic is added to the intersection if the added traffic occurs at movements that have lower than average delays. In this way, reported average wait times can decrease with the addition of new trips to the intersection, if the trips added are for turning movements that have lower wait times (left turn movements being the most time-consuming). This is the case for the

intersection in question for traffic related to the development of AHOD Site C. It should be noted that the deletion of the AHOD has been recommended by the Planning Commission. However, the intersection operations reported in this instance are correct, if initially seeming counter-intuitive. No change to the EIR is necessary. This discussion merely provides clarification and does not change the conclusions of the EIR.

4. Clarification on Data Presented in Tables 4.4-23, 4.4-24, 4.4-35, 4.4-36, 4.4-41, and 4.4-42

Tables 4.4-23, 4.4-24, 4.4-35, 4.4-36, 4.4-41, and 4.4-42 report A.M. and P.M. peak hour intersection operations for AHOD Sites A, C, and D. For unsignalized intersections, the tables report average delay per vehicle in seconds; however the % increase refers not to any change in wait times, but to project traffic in relation to the total traffic using the subject intersection. Hence, the <1.0% increases reported in these tables pertain to traffic volumes and are accurate. The % increase does not pertain to the change in average wait times, as these in many cases exceed 1.0%. The % increase is evaluated for traffic volumes in accordance with the County's methodology for assessing cumulative traffic impacts for intersections.

It should be noted that the deletion of the AHOD has been recommended by the Planning Commission. However, the intersection operations reported in these tables are correct, and no changes to the EIR are necessary. This discussion merely provides clarification and does not change the conclusions of the EIR.

5. Clarification on Construction-Phase Solid Waste

The discussion of Impact PS-4, solid waste impacts resulting from Plan Buildout is augmented to include a discussion of construction-phase solid waste. At the end of the last paragraph of Plan Buildout and Rezones, the following text is added.

> *In addition to operational solid-waste impacts resulting from new development in the Plan Area, short-term construction waste would be generated as development projects in the Plan Area are carried out. However, given the uncertainty in the size, location, and timing of such residential and non-residential development, specific impacts with respect to short-term construction waste cannot be quantified, particularly given the programmatic nature of the Community Plan. Construction waste is not a continual cumulative source such as operational waste generation. Hence, it is too speculative to determine if construction waste would have a significant impact on solid waste capacity (E-mail communication from Joddi Leipner, May 21, 2009). Cumulative construction waste impacts, however, would be addressed on a project-by-project basis pursuant to CEQA, and subject to the construction-phase development standards of the Plan that would enhance recycling effectiveness such as DevStd RSW-SYV-1.4, and DevStd RSW-SYV-1.5.*

6. Clarification on Fencing Specifics for Mitigation Measure FH-1.1

The following minor wording change is made to clarify what type of fencing is addressed in Mitigation Measure FH-1.1, which applies to future Residential Second Units and Agricultural Employee Housing development in designated High Fire Hazard Areas. For the second bulleted construction standard in this measure, insert the word "slatted" in the 4th sentence as follows:

> *Wooden slatted or plastic fences or vegetation growing on fences for lots along the project site perimeter shall not be used.*

7. Suggested Refinements to Remove Redundancy in Policies, Development Standards, and Actions

During the Planning Commission hearings on the SYVCP and EIR, a commenter suggested that several policies, development standards, and actions are redundant to existing Countywide standards and requirements stated elsewhere in the Comprehensive General Plan and its implementing ordinances, and administrative documents. A list of potential redundancies was provided to County staff, who reviewed the list and determined that several of the suggestions or deletions should be made. As a result of this input, the following changes to the SYVCP are recommended.

Table I. Minor Refinements to the Community Plan to Eliminate Redundancies

DevStd LUG-SYV-7.1	Change - delete, restates standard condition. Cite Noise-2 standard condition by reference.
DevStd LUG-SYV-7.2	Change - delete, restates standard condition. Cite Noise-4 standard condition by reference.
Action LUT-SYV-1.2	Change - delete, restates HE language. Cite HE Policy 7.2, Action 2 by reference.
Action LUT-SYV-1.3	Change - delete, restates HE language. Cite HE Policy 7.2, Action 2 by reference.
Policy LUT-SYV-1.6	Change - delete, restates HE language. Cite HE Policy 1.6 by reference.
Policy LUT-SYV-5.6	Change - add word 'Central' to Board of Architectural Review.
DevStd LUA-SYV-3.2	Change - delete, standard condition. Cite compliance with standard condition Ag-5 for properties w/in 1,000 feet of agriculturally zoned land.
Policy CIRC-SYV-3	Change - delete, redundant policy. Cite Circulation Element Policy E.
Policy CIRC-SYV-8	Change - delete, redundant policy. Cite LUDC §35.30.090.K & CalTrans requirements.
Policy CIRC-SYV-14	Change - delete, redundant to standard condition. Cite standard condition Traf-6.
GOAL PRT-SYV	Change - add words 'PRT and'. No, instead add 'Recreation' .
GOAL WW-SYV	Change - replace 'provide' with 'monitor'. Replace 'provide' with 'ensure'
DevStd WW-SYV-2.4	Change - delete, std. condition. Cite std. EHS condition.
DevStd WW-SYV-2.6	Change - delete, std. condition. Cite std. condition Wat-15.
DevStd WW-SYV-2.7	Change - delete, std. condition. Cite water resources std. conditions.
DevStd WAT-SYV-1.2	Change - delete, add citation to Water Resources std. conditions to Policy WAT-SYV-1. Add citation to this DevStd instead.
DevStd RSW-SYV-1.3	Change - delete, already done. Cite std. condition SolidW-1.
DevStd RSW-SYV-1.4	Change - delete, already done. Cite std. condition SolidW-2.
DevStd GEO-SYV-1.3	Change - delete, std. condition. Cite std. condition GEO-4.

These minor refinements do not reduce the effectiveness of any of the mitigative policies, development standards, or actions of the SYVCP. The changes merely eliminate redundancies where equivalent or similar policies, standards, or actions exist elsewhere in County regulations or policies and therefore do not need to be reiterated in the SYVCP. Hence, no new environmental impacts would be presented by the recommended changes, nor does the incorporation of these changes result in substantial new information that would prompt recirculation of the EIR.

IV. FINDINGS

It is the finding of the Board of Supervisors that based on revisions to the Proposed Final EIR as described above, impacts resulting from implementation of the Downzone without AHOD Alternative would not result in a change in the levels of impact identified in the existing analysis contained in 08EIR-00000-00004. As such, the analysis incorporated into the EIR by this EIR Revision Letter may be used to fulfill the environmental review requirements for the current project and the information contained herein does not require recirculation pursuant to CEQA Guidelines Section 15088.5.