

6.0 Alternatives

CEQA Guidelines Section 15126.6 requires that an EIR compare the effects of a “range of reasonable alternatives” to the effects of a project. The alternatives selected for comparison should be those that would attain most of the basic project objectives and avoid or substantially lessen one or more significant effects of the project. As discussed in Chapter 4, the proposed Gaviota Coast Plan (Plan) would result in potentially significant direct, and/or cumulative environmental impacts related to cultural resources, biological resources, and parks, recreation, and trails. In developing the alternatives to be addressed in this chapter, consideration was given to the ability to avoid or substantially reduce significant environmental impacts (identified in Chapter 4 of this EIR).

The “range of reasonable alternatives to the project” is governed by the “rule of reason,” which requires that the EIR set forth only those alternatives necessary to permit an informed and reasoned choice by the Lead Agency and to foster meaningful public participation (CEQA Guidelines Section 15126.6(f)). The Lead Agency for this project is the County. The County Board of Supervisors and Planning Commission will consider these alternatives and determine whether to adopt the proposed Plan as proposed, or one of the alternatives.

The proposed Plan alternatives addressed in this EIR were selected in consideration of one or more of the following factors:

1. The extent to which the alternative would feasibly accomplish most or all of the basic objectives of the proposed Plan;
2. The extent to which the alternative would avoid or substantially lessen any of the identified significant environmental effects of the proposed Plan;
3. The feasibility of the alternative, taking into account site suitability, economic viability, availability of infrastructure, Comprehensive Plan and LCP consistency, and consistency with other applicable plans and regulatory limitations;
4. The appropriateness of the alternative in contributing to a “reasonable range” of alternatives necessary to permit a reasoned choice; and
5. The requirement of the CEQA Guidelines to consider a “no project” alternative; and to identify an “environmentally superior” alternative in addition to the no project alternative (Section 15126.6[e]).

CEQA Guidelines Section 15126.6 generally defines “feasible” to mean an alternative that is capable of being accomplished in a successful manner within a reasonable period of time, while also taking into account economic, environmental, social, technological, and legal factors. According to the CEQA Guidelines, any alternative considered would also need to be consistent

with the project objectives which are described in Chapter 2, Project Description, supporting the proposed Plan's consistency with Comprehensive Plan goals protecting important coastal and inland resources and promoting sustainable recreational and agricultural land use within the Plan Area.

During the years preceding the proposed Plan, an extensive public process was undertaken in consideration of a National Park as a planning and land use alternative for the Gaviota Coast. This process, detailed in 6.1.1 below, ultimately led to a decision to abandon the National Park alternative and for the County to take the lead in planning for the Gaviota Coast, resulting in the proposed Plan. The local planning initiative is consistent with the Coastal Act's goal to:

“Encourage state and local initiatives and cooperation in preparing procedures to implement coordinated planning and development for mutually beneficial, uses, including educational uses, in the Coastal Zone.”

During the U.S. Park Service's study of the Gaviota Coast, strong interest emerged in the planning and conservation of the region in the face of growing pressure for urbanization. Environmental groups launched campaigns to “Save the Gaviota Coast,” while public and private financial support grew for the voluntary purchase of land and agricultural conservation easements, as well as for cooperative projects to restore creeks and watersheds.

A group of Gaviota landowners formed the Gaviota Coast Study Group in 2001 and developed a set of recommendations to guide future planning of the Gaviota Coast (Gaviota Coast Study Group 2005). The Gaviota Coast was last reviewed for appropriate land use and zoning designations in 1980-1982 as part of the countywide adoption of the Comprehensive Plan and the original LCP.

In 2009, the Santa Barbara County Board of Supervisors directed the Planning and Development Department to proceed with preparation of a long-term land use plan for the Gaviota Coast. The Gaviota Coast Plan was designed to provide focused policy direction addressing issues and development trends specific to the Gaviota Coast. The proposed Plan is the result of a multi-year effort by the community and County involving targeted research, data collection and analysis, extensive public involvement through Gaviota Coast Planning Advisory Committee (GavPAC) community meetings, the drafting of goals, policies, and development standards, and public hearings with the Planning Commission and Board of Supervisors. The proposed Plan is intended to provide the general public, landowners and decision makers with a directive framework for planning future development in the region.

The following specific objectives for the proposed Plan support the underlying purpose of the project, assist the County as Lead Agency in developing a reasonable range of alternatives to evaluate in this EIR, and will ultimately aid the Lead Agency in preparing findings and overriding considerations, if necessary. The proposed Plan's objectives are:

- Protect and ensure continued suitability and productivity of agricultural lands.
- Protect and enhance interconnected habitat areas and watersheds from the ridgeline to the ocean.
- Preserve and enhance public access to the coast, including a robust interconnected coastal and inland trail system.
- Preserve and enhance important scenic views of the valley, mountains and coastal open spaces.
- Ensure public infrastructure is scaled to the community and water and wastewater systems are protected, enhanced and sustainably managed and maintained.
- Protect, enhance, and preserve important cultural and historic resources.
- Ensure the transportation system is well-planned and maintained and the traffic level-of-service standards are consistent with the goals and policies in the Comprehensive Plan.
- Support a safe, complete, pedestrian friendly, and sustainably managed and maintained transportation system that provides full multi-modal access to the community, and connections regionally and between commercial and residential areas.

Recent court cases have upheld a Lead Agency's reliance on project objectives both to narrow the scope of alternatives analyzed in an EIR and, ultimately, to reject those alternatives as infeasible if there is substantial evidence that an alternative will inhibit the agency's ability to achieve most of the basic objectives of the project (Jones v. Regents of the University of California [2010 183 Cal.App.4th 818]).

This chapter identifies three ~~(3)~~ alternatives that were eliminated from further consideration and reasons for dismissal, and a full analysis of three additional project alternatives, as well as a No Project Alternative. The following sections provide a comparison of the potential environmental impacts associated with all fully analyzed alternatives relative to the proposed Plan. Each major issue area included in the detailed impact analysis of this EIR has been given consideration in the alternatives analysis.

As required under CEQA Guidelines Section 15126.6(e)(2), the EIR must identify the environmentally superior alternative. Pursuant to the CEQA Guidelines, if the No Project Alternative is determined to be the environmentally superior alternative, then another alternative among the alternatives evaluated must be identified as the environmentally superior alternative.

The environmentally superior alternative determination analysis is in Section 6.3 below.

6.1 Alternatives Considered But Rejected

This subsection of the EIR is provided consistent with the CEQA Guidelines Section 15126.6 which states that the EIR need examine in detail only a reasonable range of alternatives that the Lead Agency determines could feasibly attain most of the basic objectives of the project. Further, the EIR should identify any alternatives that were considered by the Lead Agency but were rejected and briefly explain the reasons underlying its determination. Among factors used to eliminate alternatives from detailed consideration in the EIR is failure to meet most of the basic project objectives or inability to avoid significant environmental effects (Guidelines 15126.6[c]). Consistent with the requirement to address a “reasonable range” of alternatives, another consideration for excluding an alternative from further study includes similarity to other alternatives that are addressed in detail.

As introduced above, a significant public effort from 1999-2004 explored a National Park alternative for the Plan Area. During development of the proposed Plan by the County of Santa Barbara, a Visitor Serving Commercial Alternative, and a Reduced Parks, Recreation, and Trails Alternative were reviewed and both alternatives were removed from further consideration by the County.

These three alternatives were removed from further consideration ~~for potential development~~ for three primary reasons: (1) inconsistency with regional planning priorities, (2) inconsistency with the Goals of the Coastal Act and Coastal Land Use Plan, and (3) failure to attain the project objectives. Specifically, their potential to cause significant land use, agriculture, and traffic impacts would be inconsistent with the project objectives. The three alternatives considered but rejected from detailed analysis include:

1. National Park Alternative
2. Visitor Serving Commercial Alternative
3. Reduced Parks, Recreation, and Trails Alternative

6.1.1 National Park Alternative

In ~~2009-1999~~ the United States Congress considered a recommendation that the Gaviota Coast be added to the National Park System. Congress directed the U.S. Department of the Interior NPS to complete a special resource study, or feasibility study, of the Gaviota Coast for inclusion into the National Park system. The study (P.L 106-113) addressed a 76-mile segment of coastal watersheds in Santa Barbara County between Coal Oil Point in Isla Vista to Point Sal at the northern boundary of Vandenberg AFB. The NPS prepared this study in order to determine whether all or part of the Gaviota Coast study area meets established criteria for designation as a unit of the National Park System and to evaluate what would be the most effective and efficient protection strategy for this area.

In 2004, after an extensive public process and environmental assessment, the NPS determined it infeasible to add the Gaviota Coast to the National Park System for these primary reasons:

- Sufficient land was not available to NPS;
- Strong opposition from study area landowners made it unlikely that effective NPS management could occur; and
- NPS was not able to undertake new acquisition or management responsibilities due to the cost and magnitude of the project, competing priorities, and the need to concentrate on addressing the backlog of deferred maintenance in the existing National Park System.

Ultimately, consistent with the Coastal Act, Santa Barbara County became the lead agency to implement coordinated planning in the Plan Area.

6.1.2 Visitor Serving Commercial Alternative

During the public meetings of the GavPAC, options to increase visitor serving commercial uses in the Plan Area were considered. Several locations in the Plan Area adjacent to highways, roadways, and key intersections were considered for their appropriateness for locating visitor serving uses, such as gas stations, convenience stores, or restaurants.

This alternative was not considered for further analysis for the following reasons:

- Inconsistency with the project objectives: visitor serving commercial uses were determined to be inconsistent with the Plan's primary objectives to ensure the continued suitability and productivity of agricultural lands and the protection of interconnected habitat areas and watersheds;
- Inconsistency with CLUP policies directing commercial scale visitor serving uses into designated urban areas, ~~that~~ which do not exist in the Plan Area;
- Visitor serving uses have the potential to create visual, (lighting, glare, design) impacts inconsistent with the rural nature of the Plan Area; and
- Inconsistency with the proposed Plan's objective to protect agricultural productivity: this alternative has a high potential to increase congestion and create safety conflicts on rural roads and at highway intersections that are important routes for produce and supply trucks and equipment supporting agricultural operations in the Plan Area.

6.1.3 Reduced Parks, Recreation, and Trails Alternative

The GavPAC considered options to limit the potential effects of increased parks, recreation, and trails users on landowners and agricultural operations in the Plan Area. Options for a less robust, more generalized approach to parks, recreation, and trails and coastal access that significantly reduced future recreation opportunities were considered. However, this alternative was not considered for further analysis for the following reasons:

- Inconsistency with the Coastal Act's goal to maximize public access to and along the coast and maximize public recreational opportunities in the Coastal Zone consistent with sound resources conservation principles and constitutionally protected rights of private property owners; and
- Inconsistency with the proposed Plan objectives: limiting parks, recreation, and trails and coastal access in the Plan Area is inconsistent with the proposed Plan's objective to preserve and enhance public access to the coast and provide a robust interconnected coastal and inland trail system.

6.2 Project Alternatives

The proposed Plan is largely intended to update the Comprehensive Plan and CLUP to: (1) balance future development potential consistent with continuation of viable agriculture and protection of environmentally sensitive areas; (2) provide a local vision for lasting protection of the Gaviota Coast; in part through the development of new policies, programs, and planning tools specific to the Plan Area that balance resource protection, coastal access, continuation and enhancement of working agriculture and private property use, and which respect and balance the rights and needs of property owners and the community to ensure continued viability and productivity of agricultural lands; and (3) facilitate proper planning, and accurately reflect the prevailing visions and objectives of the community.

This EIR evaluates four alternatives to the proposed Plan: No Project, Alternative 1, Alternative 2, and Alternative 3. The No Project Alternative would retain the existing ~~1982~~–1980 Comprehensive Plan and 1982 CLUP. Alternative 1 would enhance protection of riparian and other natural and visual resources and clarify allowed uses within the Coastal Zone above and beyond what is addressed in the proposed Plan. Implementation of this alternative is envisioned to be through revised policies pertaining solely to the Coastal Zone, that are consistent with the CLUP, and the addition of a new Gaviota Coast Plan (GAV) Overlay District to the Coastal Zoning Ordinance that would create separate review processes for land use proposals in the Coastal Zone. Projects in the inland portions of the Plan Area would undergo development review as detailed in the proposed Plan and amendments to Chapter 35 of the LUDC.

Alternative 2 addresses significant effects on visual resources, biological resources, and recreation that have been identified for the proposed Plan, and Alternative 2 prioritizes conservation of the area's resources and character (including agricultural resources) when considering development proposals. It presents different policy approaches that are capable of a higher level of conservation and providing better access to the coast in the Plan Area.

Alternative 3 addresses potential land use impacts and identifies the creation of an incentive program for voluntary landowner actions that provide a demonstrated public benefit. The Gaviota Coast Incentive Program, as currently envisioned, would provide an incentive framework with a range of land owner incentives, from encouraging agricultural conservation easements (ACE), to dedication of public trails, to the restoration of historic structures.

6.2.1 No Project Alternative

6.2.1.1 Description

Consistent with CEQA Guidelines Section 15126.6(e) when a project is a revision of an existing land use or regulatory plan, policy, or ongoing operation, the “no project” alternative will be an analysis of the reasonably expected buildout under the existing Plan. For this analysis, the No Project Alternative consists of a comparison of the proposed Plan to buildout of land use under the land use designations of the existing ~~1982-1980~~ Santa Barbara County Comprehensive Plan for inland areas and the existing 1982 Santa Barbara County CLUP for Plan Areas in the Coastal Zone, and existing implementing zoning ordinances: ~~(the LUDC)~~ for the Inland Area, and the Coastal Zoning Ordinance, Article II, for the Coastal Zone). The existing ~~1982~~ Comprehensive Plan and CLUP contain goals, policies, and implementing actions to address potential resources impacts related to land use in the Plan Area. The CLUP Resource Protection and Development Policies, address major coastal resource, protection, and development issues in the Plan Area.

The primary difference between the No Project Alternative and the proposed Plan is that the proposed Plan includes additional goals, policies, and actions that reflect an updated perspective on land use and resources conservation issues identified by the public and decision-makers during outreach and public hearings on the proposed Plan.

In addition, compared to the existing standards in the No Project Alternative, the proposed Plan includes new natural, cultural, and agricultural resources stewardship policies and development standards, and introduces a PRT Element and Maps to address public access on the coast and inland, and introduces additional resources conservation and implementation measures. Overall, these policy and actions are intended to support the proposed Plan objectives above.

Buildout projections for the proposed Plan are provided in Section 4.1 of this EIR.

6.2.1.2 No Project Alternative Impact Analysis

A summary of the impacts of the No Project Alternative in comparison to the proposed Plan is provided in Table 6-1.

Land Use and Planning

The 1982 Comprehensive Plan contains a range of policies that address land use planning, resources protection, and compatibility, including construction-related impacts (uses, noise, dust, traffic, air quality, and erosion) (see Table 5.2-1). The existing CLUP contains specific policies that focus on water management and long-term protection of water resources; avoidance of hazardous areas; and protection of sensitive habitats, hillsides, bluffs, beaches, cultural resources, scenic quality, public open space, recreation, and beach access.

Conservation of resources, coastal-dependent and coastal-related uses (including industrial, energy, and gas and oil production), agriculture, protection of trees, and provision of low and moderate housing opportunities are also addressed.

Buildout of the Plan Area under the No Project Alternative would be similar to that of the proposed Plan. As detailed in Chapter 2.0, Project Description, Plan Area buildout is estimated to result in development of 167 additional single-family residences and 9 agricultural employee housing units over the 20-year Plan horizon.

The No Project Alternative would continue the existing land use and zoning designations of the Comprehensive Plan and the CLUP in the proposed Plan. Therefore, under this scenario, the proposed Plan land use and zoning changes to accurately reflect the ownership and use of the land and redesignate Ordinance 661 lands would not occur. For example, the proposed Plan would redesignate Federal lands in the Plan Area within the Los Padres National Forest from Agriculture to Mountainous Area (MA-320) to better reflect the physical constraints, resources protection, and use of these steep watershed lands. The changes under the proposed Plan would apply to lands with an average slope in excess of 40 percent that would be kept free of development in favor of uses such as watershed, scenic enjoyment, wildlife habitat, grazing, orchards, and vineyards.

The No Project Alternative would also not include the proposed Plan removal of the Agriculture-Residential Cluster (ARC) zoning overlay and CLUP Policy 8-8 that currently applies to the Cojo-Jalama Ranches in the western Plan Area. Under the No Project Alternative, the existing ARC zoning overlay could result in development of a residential housing cluster on important rural and open space lands and would not be allowed under the proposed Plan. In addition, the No Project Alternative would not implement development of new rural clustering and transfer of development rights ordinances designed to prevent fragmented development throughout the Plan Area and protect open space and rural lands.

Table 6-1: Alternatives Comparison					
Issue	Plan-Wide Impacts	Project Alternatives			
		No Project	Alt. #1	Alt. #2	Alt. #3
Land Use					
LU-1 Land Use Compatibility	III	>	<	<	<
LU-2 Construction-Related Compatibility	III	>	<	<	<
LU-3 Land Use Plan Consistency	III	>	<	<	<
Traffic and Circulation					
TC-1 Circulation System	II	>=	=	<	=
TC-2 Hazards Due to a Design Feature	II	>	=	<	=
Aesthetics/Visual Resources					
VIS-1 Visual Character Changes	II	>	≤	<	=
VIS-2 Public Scenic Views, Routes, & Gateways	II	>	≤	<	=
VIS-3 Increased Light and Glare	II	>	≤	<	=
Agriculture					
AG-1 Direct Conversion of Prime Agricultural Land to Non-Agricultural Use	III	>	=	<	<
AG-2 Land Use Compatibility/Agricultural Interface (Indirect Impacts)	III	>	=	=	<
Air Quality and Greenhouse Gas Emissions					
AQ-1 Plan Consistency	III	=	=	=	=
AQ-2 Criteria Pollutants	III	=	=	=	=
AQ-3 Sensitive Receptors	III	=	=	=	=
AQ-4 Odors	III	=	=	=	=
AQ-5 GHG Emissions	III	≤	=	=	=
Biological Resources					
BIO-1 Sensitive Vegetation Communities	I	>	<	<	<
BIO-2 Sensitive Plant Species	I	>	<	<	<
BIO-3 Sensitive Wildlife Species	I	>	<	<	<
BIO-4 Jurisdictional Wetlands and Waters	I	>	<	<	<
BIO-5 Wildlife Movement Corridors	III	>	<	<	<
BIO-6 Adopted Conservation Plans	II	>	<	<	<
Flooding and Water Resources					
WR-1 Flooding	III	>	=	<	=
WR-2 Runoff and Drainage	III	>	=	<	=
WR-3 Water Quality	III	>	=	<	=
WR-4 Groundwater Supply	III	>	=	<	=
Cultural Resources					
CR-1 Historical and Archaeological Resources	I	>	=	=	≤
Public Services					
SERV-1 Emergency Response Plans	III	=	=	=	=
SERV-2 Wildland Fires	III	>	=	=	=
SERV-3 Fire Protection	III	>	=	=	=
SERV-4 Law Enforcement	III	=	=	=	=
SERV-5 Schools	III	=	=	=	=
SERV-6 Solid Waste	III	>	=	=	=
SERV-7 Water and Wastewater Facilities	III	>	=	=	=
SERV-8 Water Supplies	III	=	=	=	=
Noise					
NOS-1 Noise Exposure	III	=	=	=	=
NOS-2 Ambient Noise Level Increase	III	=	=	=	=
NOS-3 Construction Noise	III	=	=	=	=
Geologic Hazards and Soils					
GEO-1 Seismic Hazards	III	=	=	=	=
GEO-2 Soil Erosion	II	=	=	=	=
GEO-3 Geologic Instability and Radon Gas	II	=	=	=	=
GEO-4 Mineral Resources	III	=	=	=	=
Hazardous Materials/Risk of Upset					
HAZ-1 Hazardous Material Sites	III	=	=	=	=
HAZ-2 Release of Hazardous Material	III	=	=	=	=
Parks, Recreation and Trails					
PR-1 Adverse Physical Environmental Effects Resulting from Additional Recreational Facilities	I	>	=	<	<
PR-2 Increased Demand for Recreational Facilities	IV	=	=	<	<

Notes: ">" means the alternative has a greater impact than the project; "<" means the alternative has a lesser impact than the project; and "=" means the alternative has an equal impact to the project.

The No Project Alternative would also not include the proposed Gaviota Agricultural Tiered Permit Structure, which would allow additional uses intended to support primary agricultural uses and reduce agricultural conversions in the Plan Area. Under the No Project Alternative, without the additional use incentives in the Gaviota Agricultural Tiered Permit Structure, the trend of primary agricultural use conversions to residential use in the Plan Area could continue.

The analysis in Section 4.1 of this EIR identifies potentially significant but mitigable impacts related to compatibility conflicts associated with proposed Plan buildout and rezones, and cumulative compatibility. Proposed Plan policies and development standards would mitigate for these potential impacts during implementation. As discussed above, under the No Project Alternative, rezones for consistent uses and resource protection would occur and new policies addressing construction compatibility would not be implemented. Therefore the No Project Alternative would result in greater compatibility impacts than the proposed Plan due to the lack of additional zoning protections and development standards that would be provided by the proposed Plan.

Transportation and Circulation

Under the No Project Alternative the ~~1982~~-Comprehensive Plan contains Goals Policies, and Actions that would protect the natural setting of the Gaviota Coast for planned roadway improvements, and reduce operational conflicts with the various modes of transportation that make up the transportation system in the Plan Area (i.e., vehicles and trucks, trains, bicycles, hikers, and pedestrians).

Under the No Project Alternative and the proposed Plan, the number of additional trips related to the future buildout of the land uses and rezones is low and not expected to exceed the policy capacity of roads and highways. Thus, both the No Project Alternative and the proposed Plan would have similar less than significant capacity related impacts to Plan Area roads and highways.

The analysis in Section 4.2 of this EIR found that implementation of the proposed Plan would result in significant but mitigable impacts to traffic and circulation due to a design feature. The implementation of the policies and development standards in the proposed Plan were found sufficient to address the potential impact.

The proposed Plan protects the scenic character of the U.S. Highway 101 corridor by applying design criteria applicable to future projects. The proposed Plan policies also require preparation of a Transportation Corridor Plan and coordination with other agencies on regional issues to guide future improvements and adaptation strategies for the highway, the Union Pacific Railroad, and County roads. The proposed policies would minimize impacts of new roads and access through implementation of CFD Private Road and Driveway standards, improve the safety of bicycle facilities, and limit new at-grade crossings off Highway 101.

The proposed Plan's Policies and Actions, along with existing County planning, CFD, and Caltrans development standards and encroachment permit requirements, further ensure that new driveway and roadway access points will be designed to ensure safe ingress and egress from driveways to primary County Roads and Highways 1 and 101.

The No Project Alternative would not update existing policies and development standards to strengthen safety regulations addressing intersection, roadway and freeway access, design, construction, and compatibility. Therefore, the existing ~~1982~~ Comprehensive Plan under the No Project Alternative would result in more design and safety impacts to the transportation system than would the proposed Plan.

Aesthetics/Visual Resources

Under the No Project Alternative, the existing ~~1982~~ Comprehensive Plan would continue to implement Land Use Element and Open Space Element policies to protect and enhance visual resources. The ~~Land Use Element Hillside and Watershed Protection Policies of the Land Use Element and CLUP~~, as well as the Ridgeline and Hillside Development Guidelines of the LUDC and Article II, Hillside and Ridgeline Protection Ordinance (Ordinance 3714), would continue to regulate development on slopes to minimize grading, disruption of natural vegetation, and erosion which may affect visual resources. Visual Resource Policies of the Land Use Element and CLUP include measures to ensure compatibility of structures with the surrounding natural environment and/or existing community through structural design review and landscaping requirements, limitations on signs that disrupt public views (also regulated by the County Zoning Ordinances), and requirements for undergrounding new utilities (see Table 5.2-1). The Open Space Element identifies the County's scenic beauty as a principal factor in the attraction of residents and visitors, evaluates the visual quality of natural resources and travel corridors, and emphasizes the importance of urban perimeters. The Open Space Element's scenic values model includes intensity, design, and arrangement of development, preservation of natural features, and variety in landscaping as criteria for the protection of visual resources.

Under the No Project Alternative, the segment of U.S. Highway 101 through the Plan Area would continue to be eligible for designation as a California Scenic Highway. The Coastal Act mandates that scenic and visual qualities of the coast shall be considered and protected as a resource of public importance. In particular, views to and along the coast shall be protected. CLUP policies ensure that new structures are compatible with the height, scale, and design of existing buildings. Significant views to and along the coast continue to be protected by LCP policies, and the preservation of visually prominent ridgelines is also addressed. The LCP protects the existing character of the Coastal Zone, while still accommodating compatible new development.

Under the No Project Alternative, no implementation of the proposed site design hierarchy and Critical Viewshed Corridor Overlay would occur that require that development be screened to the maximum extent feasible as seen from public viewing places.

As discussed in Section 4.3 of this EIR, the proposed Plan buildout and rezones would result in significant but mitigable impacts to Visual and Aesthetic Resources (Visual Character Changes, Public Scenic Views, Routes, and Gateways; and Increased Light and Glare) and Cumulative Impacts to Visual and Aesthetic Resources (Visual Character Changes, Public Scenic Views, Routes, and Gateways; and Increased Light and Glare). All these impacts were found to be mitigated to less than significant with implementation of the proposed Plan policies, actions, and development standards.

As discussed in Section 4.3 of this EIR, the proposed Plan would include several new and/or revised policies and objectives addressing aesthetics and visual quality that are not addressed in the existing ~~1982~~ Comprehensive Plan including: considerations for viewsheds, building site location, and the character of the surrounding natural environment; ~~urban design~~; new policies for the design of ~~residential, commercial, and mixed-use~~ development; and policies protecting local scenic routes, ocean views, the night sky, gateways, and trails; and preservation of scenic views with new development.

The proposed Plan identifies additional areas where, due to the potential for impairment of particularly scenic vistas, it is desirable to further limit potential impacts from development. The proposed Plan also includes detailed policy level site location and design guidance for new projects and includes design guidelines ~~a newly revised Design Review Overlay~~ to address ~~individual~~ visual impacts of individual projects. To address the potential for encroachment of significant additional night lighting, proposed residential development and larger scale agricultural structures in the Gaviota Coast Plan Area ~~will~~ would be subject to the Outdoor Lighting provisions of the LUDC and similar requirements in Article II, Ordinance ~~and~~ undergo the Design Review process of the Board of Architectural Review. Therefore, the No Project Alternative would result in greater potential impacts to visual character and scenic views, due to the absence of the additional design and lighting protective regulations in the proposed Plan.

Agricultural Resources

Under the No Project Alternative, the existing Comprehensive Plan Agricultural Element and CLUP contain goals and policies encouraging protection and enhancement of agricultural resources. The existing Environmental Resource Management Element includes policies to preserve croplands on prime soils. Under the No Project Alternative, the County's Right-to-Farm Ordinance, the Agricultural Buffer Ordinance (LUDC Section 35.30.025 and Article II Section 35-1440), and existing policies and development standards would continue to address widespread land use compatibility and conflicts related to non-agricultural land uses.

The analysis in Section 4.4 of this EIR found that proposed Plan buildout and rezones could result in ~~a~~ potentially significant but mitigable impacts to agricultural resources due to the direct conversion of prime agricultural land to non-agricultural use (AG-1) and land use compatibility at the agricultural interface (AG-2). The analysis found that implementation of Plan policies and development standards would mitigate potential impacts to less than significant levels.

Under the No Project Alternative, conversion of primary agricultural use to residential on designated agricultural lands located along the coastal plains and bluffs between El Capitan State Beach and the City of Goleta would continue to cumulatively alter the rural open space and agricultural character of an important stretch of one of the last remaining undeveloped coastlines in southern California.

Under the No Project Alternative, the ancillary uses allowed under the Gaviota Agricultural Tiered Permit Structure would not be available to support existing agricultural operations. These ancillary uses, as described in Section 4.4, are intended to support primary agricultural uses consistent with the proposed Plan objective to protect and ensure continued agricultural productivity.

Under the No Project Alternative, the proposed Plan's proposed deletion of the existing ARC Overlay that currently applies to the Cojo-Jalama and development of a new clustering tool intended to be more appropriate Plan Area-wide would not occur. The new clustering tool is intended to provide broader application for various ranches throughout the Plan Area. In this regards, the No Project Alternative would have a higher potential to convert agricultural operations to residential use than the proposed Plan.

The No Project Alternative would not include proposed Plan land use changes—rezones of mountainous areas currently ~~zoned~~ designated Agriculture A-II-100 to Mountainous Area (MA-320). ~~This~~ These and other land use changes (and zoning changes for existing Ordinance 661 lands) would not occur to preserve existing parklands and prevent potentially significant direct long term impacts to agricultural resources from inconsistent adjacent uses. As analyzed in Section 4.4, most of the land use designation changes and rezones result in less than significant impacts to agriculture, and would provide additional long-term assurance that land use conversions and use conflicts would not occur in these areas. While the proposed Plan would be more protective of agriculture than the No Project Alternative, increased land use conflicts due to the existing land uses that are inconsistent with agriculture are possible but speculative. Therefore, the No Project Alternative has similar impacts regarding land use conflicts on existing Ordinance 661 lands and in mountainous areas.

The No Project Alternative would continue implementation of land use designations and zoning that contribute to existing trends that incentivize conversion of primary agricultural uses to non-agricultural primary residential use. As more residents relocate into agriculturally zoned land who are not engaged in agriculture, increased potential for impacts from land use conflicts exists. However, these conflicts would be reduced to a similar level of significance as the proposed Plan with implementation of existing development standards and the County's Right-to Farm ordinance.

By continuing the trend of primary agricultural-residential use conversions and inappropriate use on sensitive land, the No Project Alternative would result in greater impacts from conversion of agricultural land and land use conflicts on agricultural land and as agricultural uses infringe into resources sensitive lands. Therefore, the No Project Alternative would have both greater

impacts than the proposed Plan in regards to future conversion of agricultural uses to residential use and land use conflicts.

Air Quality/Greenhouse Gas Emissions

Land use under the No Project Alternative and the proposed Plan would be rural agricultural and low density residential land uses and result in similar less than significant impacts due to consistency (AQ-1) with applicable 2013 Clean Air Plan and SBCAG's Regional Transportation Plan and Sustainable Communities Strategy zero net growth target goals and policies. The analysis in Section 4.5, Air Quality, found that the proposed Plan does not alter the buildout potential of the Plan Area and new land use policies are intended to limit the expansion of residential development in favor of less intense, agricultural land uses. Therefore, growth under the proposed Plan would have slightly fewer effects than the No Project Alternative, but neither scenario would exceed current growth projections and impacts would be less than significant.

Overall, the No Project Alternative would result in a similar mix of agricultural and rural housing uses compared to the proposed Plan. The proposed Plan is anticipated to result in the development of 167 additional single-family residences and 9 agricultural employee housing units within the Plan Area over the next 20 years. It was calculated that this development would result in 17.4 pounds per day of ROG, 20.8 pounds per day of NO_x, and 9.8 pounds per day of PM₁₀ (Appendix F). Per County thresholds, operational impacts (AQ-2) associated with criteria pollutant emissions would be less than significant (Class III impact). Since the No Project and the proposed Plan have similar buildout, construction, and operational impacts associated with future development in the Plan Area under the existing 1982-Comprehensive Plan and the proposed Plan is expected to be similar.

The analysis found that the proposed Plan would not increase the amount of pollutants and TACs produced by stationary sources, and does not propose to locate new sensitive land uses ~~receptors receivers~~ (AQ-3) adjacent to the existing ExxonMobil Las Flores Canyon Oil and Gas Processing Plant, Gaviota Oil Heating Facility, Tajiguas Landfill and electric generator plants. In addition, no CO hotspots are located in the Plan Area. As a result, the proposed Plan's potential to expose sensitive receptors to new or existing stationary pollutant or TAC sources would be less than significant. Since the proposed Plan land use changes would result in similar buildout numbers, construction, and operational impacts to sensitive receptors associated with future development in the Plan Area under the existing 1982-Comprehensive Plan and the proposed Plan is expected to be similar.

Under the No Project Alternative, similar to the proposed Plan, no significant odor (AQ-4) impacts related to buildout of land uses in the Plan Area are expected. Population and growth projections associated with Plan Buildout are accounted for in the recently adopted County ECAP. In addition, similar to the proposed Plan, the No Project Alternative does not propose development of new stationary sources of emissions and therefore, GHG emission impacts (AQ-5) would be less than significant under both scenarios.

The No Project Alternative would result in similar buildout numbers to the proposed Plan and would not result in significant emissions that would exceed Ambient Air Quality Standards, and would not result in the exposure of sensitive receptors to substantial pollution concentrations. Therefore, as total development under the proposed Plan would not exceed project-level significance thresholds, cumulative localized impacts would be less than significant.

The ~~1982~~ Comprehensive Plan contains policies addressing air quality (see Table 5.2-1). The proposed Plan strengthens these policies and adds a new goal and objective to reduce air pollution and GHG emissions in the Plan Area, as detailed in Section 4.5 of this EIR. The additional measures in the proposed Plan would lead to less air pollution and GHG impacts than the No Project Alternative.

Biological Resources

Under the No Project Alternative, the existing ~~1982~~ Comprehensive Plan and CLUP, which contain policies that call for the protection of sensitive biological resources, would remain in effect (see Table 5.2-1). The County's Environmentally Sensitive Habitat (ESH) designation is applied to areas in the Coastal Zone with unique natural resources and/or sensitive animal or plant species. It is intended to protect and preserve specified areas that support especially rare or valuable plant or animal life or their habitats and ensure that development permitted in the overlay zone provides for maximum feasible protection to sensitive habitat areas. Currently, detailed ESH mapping is not available in the Plan Area.

Existing policies within the ~~1982 Comprehensive Plan~~ CLUP specifically call for project-by-project ESH assessment. Also, ESH areas mapped, or otherwise identified through historic evidence, shall not be deprived of protection as ESH, as required by the policies and provisions of the CLUP and Article II, on the basis that habitat has been illegally removed, or degraded, or that species that are rare or especially vulnerable because their nature or role in an ecosystem have been eliminated.

As discussed in Section 4.6 of this EIR, the proposed Plan rezones and buildout would result in potentially significant and unavoidable impacts on biological resources, including sensitive vegetation communities, sensitive plants and wildlife, jurisdictional wetlands and waters, and cumulative impacts.

The proposed Plan outlines specific criteria for vegetation communities and other natural habitats that would be included in the ESH overlay zone. However, compliance with proposed Plan policies is not anticipated to completely avoid the conversion of areas supporting sensitive vegetation communities. In addition, it is unknown if feasible on-site or off-site mitigation opportunities will be available at the time a development project is proposed. Therefore, potential impacts would be significant and unavoidable.

Under the No Project Alternative, project mapping of ESH is required by the CLUP and therefore the No Project Alternative would result in fewer impacts to biological resources in the

Coastal Zone than would the proposed Plan. In contrast, the No Project Alternative would provide less protection for biological resources outside of the Coastal Zone. This is because the No Project Alternative would not include the habitat protective MT-GAV rezone (LUDC only) and the ESH-GAV overlay would not be applied to additional resources areas to address potential use impacts to steep slopes, critical viewsheds and sensitive habitat in the Plan Area, as they would under the proposed Plan.

The proposed Plan would include several new and/or revised policies and objectives referenced in Section 4.6 of this EIR relative to biological resources, including: methods of conservation, methods of mitigation in conjunction with development, and new criteria and definitions for environmentally sensitive habitats. When compared to the No Project Alternative, implementation of these policies would further reduce impacts on sensitive biological resources. Therefore, the No Project Alternative would have greater impacts than the proposed Plan.

Flooding/Water Resources

Under the No Project Alternative, the existing ~~1982~~ Comprehensive Plan contains policies and mitigation addressing flooding, runoff, drainage, and water and groundwater quality (see Table 5.2-1). All future projects within the Plan Area would be required to comply with the County Floodplain Management and Water Course Setback ordinances, the County Grading Code, County Groundwater Thresholds Manual, County Environmental Health Services Onsite Wastewater Treatment Systems regulations in the Local Area Management Plan for private on-site wastewater treatment systems and show conformance with Comprehensive Plan policies.

The proposed Plan includes new and revised policies addressing hydrology and water quality, as described in Section 4.7 of this EIR. In addition, the proposed Plan policy revisions include updates to ensure consistency with recent changes to the CWA and NPDES requirements addressing water quality. When compared to the No Project Alternative, implementation of the proposed Plan policies would further reduce flooding, runoff, drainage, water quality impacts, and identify sea level rise hazard areas. The analysis in Section 4.7 of this EIR found no significant and unavoidable impacts from flooding (WR-1), runoff (WR-2) water quality (WR-3) and groundwater supply (WR-4) would result from buildout of the proposed Plan. In terms of implementation, ~~since~~ the No Project Alternative would not include updated regulations; therefore, it could result in greater flooding, runoff, drainage, water quality, and sea level rise impacts than the proposed Plan.

Cultural and Historic Resources

Under the No Project Alternative, existing ~~1982~~ Comprehensive Plan and CLUP policies and development standards applicable to land use projects that would result in potentially significant impacts to cultural and historic resources would continue to apply. As historical and prehistoric resources are known to exist within the Plan Area, future development (and associated grading) has the potential to result in significant direct and/or indirect impacts on archeological and historical resources. For both the No Project Alternative and the proposed Plan development of

future land uses and parks, recreation, and trails would result in significant and unavoidable and cumulative impacts to historical and archaeological resources (CR-1). As with the proposed Plan, implementation of this alternative would require future projects to adhere to all applicable federal, state, and local regulations regarding the protection of cultural resources, as described in Section 4.8 of this EIR.

Compared to the No Project Alternative, the proposed Plan includes additional mitigation for the protection of cultural resources, as described below. However, even with mitigation, the impacts from demolition of significant historic-period buildings and structures, degradation of significant archaeological sites, or significant changes in the setting or integrity of historical sites or districts would remain significant and unavoidable for the proposed Plan. Even with additional protections, the proposed Plan's focus on increasing public access in the Plan Area would also increase the potential for impacts to cultural and historic resources throughout the Plan Area. Therefore both the No Project Alternative and the proposed Plan would likely result in similar significant and unavoidable and cumulative impacts to cultural and historic resources.

The proposed Plan includes policies that prioritize cultural resources stewardship and seek to strengthen existing ~~1982~~ Comprehensive Plan and CLUP policies that protect significant cultural, archaeological, and historic resources in the Plan Area. When compared to the No Project Alternative, implementation of the proposed Plan policies would further protect properties of concern, introduce cultural resources education and prioritize a new cultural center on the Gaviota Coast, address historical place landmarks, identify actions for new and rehabilitation projects, confidential sites, tribal access, development review, and preparation of historical studies in the Plan Area. Therefore, in terms of applicable policies, programs and standards, the No Project Alternative would result in greater impacts to historical and cultural resources in the Plan Area.

Public Services and Facilities

Under the No Project Alternative and the proposed Plan, development impact fees would be collected to address the need for future public facilities and would be evaluated at the time future development is proposed. Overall, the demand for services would be similar under the No Project Alternative to the proposed Plan.

The No Project Alternative would result in buildout of residential, agricultural, and commercial uses under 20-year buildout conditions, similar to the proposed Plan. As discussed in Section 4.9 of this EIR, Public Services, the proposed Plan would result in less than significant or beneficial impacts related to the provision of public services, including emergency services, law enforcement, fire protection, schools, libraries, solid waste disposal and collection, and water and wastewater services. Although the proposed Plan does not propose new facilities that would result in physical impacts from construction, the proposed Plan would accommodate greater development potential that could increase the demand for services at buildout.

Wildfire hazards may worsen under the No Project Alternative. The proposed Plan includes land use changes rezones in mountainous areas from Agriculture to Mountainous Area (MA-320) to better reflect the physical constraints and use of these steep watershed lands. Per the Land Use Element, the purpose of this category is for remote lands with an average slope in excess of 40 percent that should be kept free of development in favor of uses such as watershed, scenic enjoyment, wildlife habitat, grazing, orchards, and vineyards. The designation of rezone to Mountainous Area would not occur under the No Project Alternative. Under the No Project Alternative, incremental development within the wildland urban interface could cause additional fire hazards and development would not be subject to proposed Plan policies and mitigation, as described below.

Similar to the proposed Plan, the No Project Alternative would not directly result in impacts associated with the construction of public facilities and both would result in less than significant impacts related to physical impacts from the construction of public facilities. Therefore, the No Project Alternative would result in greater impacts than the proposed Plan due to wildfire risk than the proposed Plan due to because the protective effects of the MA-320 land use designation change rezoning and development of Steep Slopes Standards would not occur in the proposed Plan.

Under the No Project Alternative, the existing ~~1982~~ Comprehensive Plan policies addressing public facilities and services would remain in effect (see Table 5.2-1). Existing and proposed standards address adverse impacts due to wildfire. Policies addressing wildfire and fire protection would be updated under the proposed Plan to reflect a stronger emphasis on fire prevention. When compared to the No Project Alternative, implementation of these policies would address public services and facilities. However, the proposed Plan contains various new and revised policies addressing public services as discussed in Section 4.9 of this EIR. Proposed policies and development standards address range improvement and fire hazard reduction programs, including prescribed burning of brush, emergency access, water supply, and coordination between responders. Therefore, the No Project Alternative would not include the proposed Plan policies addressing wildland fires, fire protection, solid waste, and annexation to a water and wastewater facilities. Without the additional policies, the No Project Alternative would have greater impacts to public services and facilities than would the proposed Plan for these issue areas.

Noise

Under the No Project Alternative, the Comprehensive Plan and CLUP policies and the zoning ordinances development standards that seek to restrict noise exposure of sensitive receptors to acceptable levels would remain in effect (see Section 4.10). These policies would ensure residential uses along roadways are not exposed to noise levels from transportation noise sources in excess of the compatibility standards. At the program level under both the No Project Alternative and proposed Plan level, specific construction site locations cannot be identified; however, future projects would be required to comply with the Santa Barbara County Code and

Comprehensive Plan policies which would ensure cumulative noise impacts associated with construction would be less than significant.

The analysis in Section 4.10 of this EIR determined the proposed Plan would result in less than significant impacts as a result of noise exposure (NOS-1), increases in ambient noise levels (NOS-2), construction noise (NOS-3) and cumulative noise as a result of buildout. Therefore the No Project Alternative and proposed Plan would result in similar noise impacts. The proposed Plan contains no additional noise policies and development standards. Since both the No Project Alternative and proposed Plan have similar buildout potential and existing policies would apply equally, then noise impacts would be similar under both scenarios.

Geologic Hazards and Soils

The analysis of potential impacts from seismic hazards, soil erosion, and geological instability and radon gas resulting from the proposed Plan did not identify any significant and unavoidable impacts. Impacts from seismic hazards, soil erosion, geologic instability, and radon gas resulting from implementation of the No Project Alternative would be similar to those for the proposed Plan. As with the proposed Plan, implementation of the No Project Alternative would have the potential to result in development that would be subject to soil erosion, seismic hazards, geologic instability, and radon gas exposure.

Similar to the proposed Plan, development under the No Project Alternative would be exposed to geological hazards associated with ground rupture, ground acceleration (shaking), liquefaction, earthquake-induced tsunamis, earthquake-induced landslides, soil erosion, compressible and expansive soils, and radon gas. Future development under both the proposed Plan and the No Project Alternative would be required to adhere to the County's Grading Code, which requires the preparation of a site-specific geotechnical report. Impacts would also be avoided or reduced through engineering design that adheres to the County of Santa Barbara Building Code (Santa Barbara County, Code of Ordinances, Chapter 10) and the California Building Code. Compliance with established development and engineering standards and codes, as well as conformance to the recommendations of a site-specific geotechnical report, would ensure that impacts in conjunction with future development related to seismic hazards would be reduced to below a level of significance. Thus, the No Project Alternative would result in impacts similar to the proposed Plan.

Hazardous Materials/Risk of Upset

Under the No Project Alternative, Highway 101 and the rail line would continue to be the major corridors in the Plan Area utilized to transport hazardous materials, and both present a potential risk of release of hazardous materials to land uses in proximity of the highway corridor and rail line. The Tajiguas Landfill, agricultural operations, and existing oil and gas processing, shipping, and transmission systems (pipelines) would continue to be the major sources of potential hazardous materials and risk of upset due to an accident.

On May 19, 2015, Plains Pipeline, LP Line 901 an oil pipeline-carrying crude oil ruptured and spilled ~~2,500~~approximately 2,934 barrels (401,000~~123,128~~ gallons) of oil into a culvert and the Pacific Ocean near Refugio State Beach. The 24-inch diameter buried and insulated steel pipeline was carrying a blend of crude oils extracted from the from Monterey Formation in the continental shelf by the Heritage, Harmony, Hondo, and Holly oil production platforms in the Santa Barbara Channel (NOAA, 2015). Impacts from the spill include oil contamination of near shore waters and beaches resulting in closures of two state parks and several beaches, closure of active fisheries, and wildlife mortality. According to the University of California Davis School of Veterinary Medicine, Oiled Wildlife Care Network, 204 dead birds and 106 dead mammals were found in the spill area. The EIR has been revised to include the most recent data regarding the spill.

On July 3, 2015, the County of Santa Barbara issued an emergency permit (15EMP-00000-00005) to Plains All American L.P. for cleanup activities associated with an oil spill, including mechanized cleanup equipment on the sandy beach from Refugio State Park to the Goleta area. Clean up activities included ocean cleanup and staging at several locations adjacent to the Park. On July 16, 2015, the Unified Command directing cleanup operations for the Refugio oil spill reported the effort was 98 percent complete.

Comparatively, neither the No Project Alternative nor the proposed Plan land uses would result in new significant sources of hazardous materials, including new oil and gas extraction or production facilities, or waste facilities. Should new facilities be proposed in the future they would be required to undergo complete environmental review at that time. Overall buildout in the Plan Area is limited to a low-density residential units and agricultural housing units built throughout the 20-year Plan horizon, with commercial development limited to a 2-acre site near Las Cruces. Although historical sites of hazardous materials exist throughout the Plan Area, compliance with federal, state, and County regulations would ensure future development projects are carefully sited, designed, permitted, and mitigated to minimize the impacts associated with hazardous materials. As a result, the No Project Alternative and the proposed Plan would result in similar impacts to hazardous materials/risk of upset.

Parks, Recreation, and Trails

Under the No Project Alternative, the ~~1982~~Comprehensive Plan, CLUP, and the PRT Map PRT-1 (~~2009~~) would continue to guide decisions regarding new and existing recreation facilities in the Plan Area. The~~1982~~ Comprehensive Plan includes an Open Space Element that addresses four categories of open space as required per California Government Code: open space for public health and safety; open space for the managed production of resources; open space for outdoor recreation; and open space for the preservation of natural resources. Additionally, the ~~1982~~Comprehensive Plan Land Use Element includes a Recreation Section, which establishes a baseline level of park and recreation service; provides an inventory of existing park and recreation facilities, both private and public; makes specific recommendations for the acquisition of additional sites and development of existing sites to meet indoor and

outdoor recreation and needs identified; and identifies possible school park joint use opportunities.

In addition, the public's right of access to all beach areas below the ordinary high water mark (mean high tide line) is guaranteed by the California Constitution. The mandate of the local coastal program, as defined by the Coastal Act, is to provide maximum opportunities for access and recreation consistent with the protection of natural resources. The County's CLUP includes policies and recommendations, ~~which~~ that are intended to provide the framework for implementation of a key Coastal Act goal of providing maximum opportunities for access and recreation. The CLUP specifies policies and recommendations designed to increase opportunities for access and recreation in each of the planning areas.

Under the No Project Alternative, new parks, recreation, and trails development in the Plan Area would not be developed under the proposed Plan's structured Trail Siting Guidelines (Appendix C). The Trails Siting Guidelines in the proposed Plan would ensure that trails are appropriately sited, landform alteration is minimized, and that trail alignments and beach access utilize natural topography and avoid areas that are highly geologically unstable or especially prone to erosion, and avoid impacts to important biological, cultural, and historic resources as well as avoid impacts to agricultural resources and operations.

The proposed Plan amends the existing PRT maps for the Gaviota Coast Plan Area to reflect more specific trail alignments compared to the existing ~~1982~~ Comprehensive Plan PRT maps, including inland and coastal trails, as well as the California Coastal Trails (CCT) (See Figures 2-8 through 2-13). Section 4.13 of this EIR, Parks, Recreation, and Trails, analyzes the impacts constructing new trails within the general corridors shown on the PRT maps, ~~each of the five Gaviota Coast Trail segments. E~~ For the CCT, each trail segment in the plan consists of multiple several alignment alternatives to provide options for a logical linear coastal alignment connecting public access points at various locations adjacent to Highway 101 and other public roadways in the Plan Area. The impact analyses and recommended mitigation measures found in Section 4.13 are programmatic in nature due to the conceptual level of the trail alignment corridors.

The proposed Plan would amend the PRT maps, including approximately 107 miles of proposed trail alignments which would retain approximately 49 miles of existing trails. The PRT element includes recommendations for new trailheads, parking, picnic tables, restrooms, bicycle parking and eight new beach access points. The development of trails and coastal access could potentially impact sensitive resources where they are located near coastal bluffs, agricultural lands, high-fire hazard areas, existing riparian corridors, creeks, or other sensitive resource areas. The construction of trails and recreational facilities has the potential to result in adverse site related environmental effects.

As discussed in Section 4.13 of this EIR, the proposed Plan's new PRT element and trails maps would result in significant unavoidable impacts to Agricultural Resources: (Conversion of Agricultural Lands: Land Use Compatibility); Biological Resources: (Sensitive Vegetation

Communities, Sensitive Wildlife Species: Jurisdictional Wetlands and Waters, and Wildlife Movement Corridors); and Cultural Resources: (Impacts on Historical and Archaeological Resources).

Ultimately, the proposed Plan PRT element would result in a coordinated approach to PRT development in the Plan Area that would result in increased public PRT use and beach access in the Plan Area. Under the No Project Alternative, a similar public demand exists for PRT and beach access.

Under No Project Alternative, incremental PRT improvements in the Plan Area would continue to occur, ~~but~~ and would not be developed with the benefit of the coordinated approach to trails, ~~and~~ facilities design, and resources avoidance measures outlined in the proposed Plan policies, actions, and development standards. Further, under the No Project Alternative, PRT improvements would occur without unifying design guidance and resource protective approaches required by the Trails Siting Guidelines. Therefore, ~~the~~ No Project Alternative would have a greater potential impact to sensitive resources than the proposed Plan due to the proposed Plan's coordinated approach to resources protection and public access.

6.2.2 Alternative 1

6.2.2.1 Description

The proposed Plan ~~would~~ provides protection for and enhancement of the natural resources of the Plan Area, supports agricultural viability, and increases public access throughout the Plan Area while preserving the rural character of Gaviota Coast. The proposed Plan also describes the prospect for an even greater level of achievement of these objectives through enhanced access to the coast. ~~Alternative 1 could better achieve these goals. This may be achieved through alteration of proposed Plan policies and actions that specifically~~ apply to the Coastal Zone. This alternative would also enhance protection of riparian and other natural and visual resources and clarify allowed uses within the Coastal Zone. Implementation of this alternative is envisioned to be through revised policies pertaining solely the Coastal Zone, that are consistent with the CLUP, and the addition of a new Gaviota Coast Plan (GAV) Overlay District to the Coastal Zoning Ordinance that would create separate permit review processes for land use proposals in the Coastal Zone. Projects in the inland portions of the Plan Area would undergo development review as detailed in the proposed Plan and amendments to Chapter 35, Land Use and Development Code (LUDC).

Coastal Zoning Ordinance amendments associated with Alternative 1 are included in Appendix I ~~B~~ and summarized below. Several of the proposed ordinance amendments are the same as with the proposed Plan; however, several are specific to Alternative 1 and these are highlighted in *italics*.

Summary of Alternative 1 Proposed Amendments to Article II

- 1) Amend Division 2 (Definitions) to:
 - Amend existing definition of “Accessory Agricultural Building or Structure” to be consistent with the definition in the Land Use and Development Code (LUDC).
 - Add existing definitions from the LUDC that define the uses listed in the use tables:
 - Add new definitions that define the new uses allowed within the GCP Overlay or otherwise result from the GCP overlay:

Agricultural and Natural Resource Educational Experience, Artisanal Crafts, Aquaponics, Farmstand, Firewood Processing and Sales, Fishing, Gaviota Coast Plan Area, Guest Ranch/Farmstay, Highway, Horseback Riding, Lumber Processing, Milling, Product Preparation, Tree Nut Hulling, Visually Subordinate.
- 2) Amend Division 5 (Overlay Districts) to add the “CVC - Critical Viewshed Corridor Overlay District” to the existing overlays.
- 3) Amend Division 7 (General Regulations) to include the Gaviota Coast Plan Area in the list of areas in Section 35-139 (Exterior Lighting) that have additional requirements regarding exterior lighting.
- 4) Amend Division 12 (Administration) to specify in Section 35-184 (Board of Architectural Review) that the Gaviota Coast Plan Area, in addition to the Summerland Plan and Toro Canyon Plan Area, has additional requirements regarding projects that require review by the Board of Architectural Review.
- 5) Add a new Division 18 Gaviota Coast Plan Overlay that:
 - **Section 35-420.C:** *In compliance with a requirement of the Coastal Commission, includes dividing permitted uses (uses not requiring a conditional use permit) into Principal Permitted Uses versus Permitted Uses:*

Principal Permitted Use (PP): *A use that clearly carries out the designated land use and the intent and purpose of a particular zone. An action to approve or conditionally approve a Coastal Development Permit (CDP) application for a use designated PP is not subject to appeal to the Coastal Commission except as specified in Section 35-182 (Appeals) of Article II.*

Permitted Use (P): *An action to approve or conditionally approve a CDP application for a use designated as P is always subject to appeal to the Coastal Commission.*
 - **Section 35-420.D:** Includes a new section on exempt activities and structures that is modeled on the language approved by the Coastal Commission as part of an effort the attempt to have certify the LUDC ~~be certified~~ for the Coastal Zone and replace Article II.

- **Section 35-420.E.1:** Provides the uses allowed within the Gaviota Coast Plan Area and applicable permit requirements in a table format.
- **Section 35-420.E.3:** Includes language that determines when an accessory structure or use is considered a PP versus a P use.
- **Sections 35-420.E.4.a and 35-420.E.6:** Includes language to implement the Agricultural Permit Process Streamlining Ordinance Amendment adopted by the County for the non-Coastal Zone area in 2009 that relates the requirement to process a Development Plan to the lot size of the project and the type of development proposed.
- **Section 35-430:** Includes new lighting standards for outdoor lighting that currently apply within the Coastal Zone portions of the Summerland Plan and Toro Canyon Plan Areas.
- **Section 35-440.A:** Includes regulations regarding animal-keeping that is modeled on the language approved by the Coastal Commission. This includes language addressing “confined animal facilities” and factors that determine when such facilities associated with the animal-keeping is considered a PP versus a P use.
- **Section 35-440.B:** Sets out criteria to determine when the primary dwelling on a lot may be considered as a component of the principal permitted agricultural use of the lot and therefore also qualify as a PP use. This is also modeled on the language previously approved by the Coastal Commission.
- **Sections 35-440.C.2 through C.4:** These sections include new language regarding the development of rural recreation that implements the policies of the Gaviota Coast Plan.
- **Section 35-440.D:** Includes criteria that must be satisfied in order for school facilities to be allowed with a Major Conditional Use Permit in the AG-II zone. This is also modeled on the language previously approved by the Coastal Commission.
- **Section 35-450:** Includes permit requirements and development standards for new uses that may be allowed on AG-II zoned land within in the Gaviota Coast Plan Area in addition to agricultural employee housing, agricultural processing facilities, aquaculture, rural recreation, and winery uses that are currently allowed. These new uses are:
 - **Section 35-450.D.2:** Product preparation.
 - **Section 35-450.D.3:** Processing (beyond the raw state).
 - **Section 35-450.D.4:** Tree nut hulling.
 - **Section 35-450.E.1:** Farmstands.
 - **Section 35-450.G:** Aquaponics (closed system).
 - **Section 35-450.H:** Composting.
 - **Section 35-450.I:** Firewood processing and sales.
 - **Section 35-450.J:** Lumber processing and milling.
 - **Section 35-450.K.1:** Campgrounds.
 - **Section 35-450.K.2:** Fishing.
 - **Section 35-450.K.3:** Guest_ranch/Farmstay.
 - **Section 35-450.K.4:** Horseback riding.

- **Section 35-450.I:** Water well, agricultural. Although not a new use, this section provides that an agricultural water well may be approved with a Zoning Clearance rather than a Coastal Development Permit if certain standards are satisfied.

6.2.2.2 Impact Analysis

A summary of the impacts of Alternative 1 in comparison to the proposed Plan is provided in Table 6-1. The impacts analysis of Alternative 1 focuses on the environmental issue areas identified in Chapter 4.0 that would be potentially altered by the alternative. Several issues areas' impact levels would have similar impacts to the proposed Plan and are summarized at the end of the analysis.

Policy Consistency

The Coastal Commission reviews LCP Amendments for consistency with the Chapter 3 policies of the California Coastal Act and the certified Land Use Plan. Pursuant to the Coastal Act, an LCP consists of a local government's land use plan together with zoning ordinances, zoning maps, and other implementing planning actions which carry out the provisions of the Coastal Act. Specifically, an LCP includes two separate components, the Land Use Plan (LUP) and the Implementation Plan (IP). In Santa Barbara County, the LUP is the 1982 Coastal Land Use Plan (CLUP) and the IP is the Coastal Zoning Ordinance (Article II).

The CLUP includes all resource protection and development policies and Article II includes all zoning ordinances, zoning district maps, and other actions which implement the policies in the CLUP. The standard of review that the Commission uses in reviewing the adequacy of an amendment to the CLUP is whether the CLUP, as amended would remain consistent with, and meet the requirements of, the policies of Chapter 3 of the Coastal Act. The standard of review for a proposed amendment to Article II ~~component~~ of the certified LCP, pursuant to Sections 30513 and 30514 of the Coastal Act, is whether the amended Article II, as the IP, ~~with the proposed amendment,~~ would be in conformance with, and adequate to carry out, the provisions of the amended CLUP, ~~portion of the certified LCP, as amended.~~ According to the California Coastal Commission, all Chapter 3 policies of the Coastal Act have been incorporated in their entirety into the existing certified Santa Barbara County CLUP as guiding policies pursuant to Policy 1-1 of the CLUP (CCC Letter, 2014).

To attain consistency in the CLUP with adoption of the proposed Plan, the CLUP amendment must clearly identify which provisions of the document will apply within the Coastal Zone and demonstrate their consistency. Currently, the proposed Plan intends to apply policies and development standards consistently in the Coastal Zone and Inland Area. However, Coastal Commission staff has commented that some of the policies and background descriptions in the proposed Plan differentiate between Coastal Zone areas and Inland areas.

~~(Draft Plan, p.1-3).~~ Specifically, the proposed Plan does not clearly identify which plan components are proposed to be part of the CLUP (Land Use Plan) versus which plan components are proposed to be part of Article II (Implementation) (CCC Letter, 2014).

~~Alternative 1 addresses potential Coastal Act policy inconsistencies~~would clearly differentiate CLUP policies and components of the Plan by including: (1) revisions to policies, and (2) ~~by including all proposed Plan Coastal Zone land uses, permit levels (including allowed uses, no permit required [Exempt]) Permitted use, appealable Coastal Permit; Principal Permitted Use, Coastal Permit required; Minor and Major Conditional Use Permits, Allowed Use, Zoning Clearance; and Specific Use Regulations; and a complete hierarchy of development standards into the Gaviota Coast Plan (GAV) Overlay amendment to Article II (Appendix I).~~

Adoption of Alternative 1 with the proposed Plan would ~~ensure further the proposed Plan's project's~~ consistency with the CLUP and the Coastal Act by providing all CLUP components distinctly separate from those that apply in the Inland Area, and thereby result in fewer potential policy consistency (i.e., land use plan consistency) impacts than the proposed Plan.

Land Use

Related to land use, Alternative 1 would revise proposed Plan Policy LU-2 applicable to the Coastal Zone in the Plan Area.

*(Revised) **Policy LU-2: Policy Implementation, (COASTAL)** The Policies and Development Standards of this Plan shall be implemented in a manner that does not take private property for public use without just compensation as required by applicable law. Within the Coastal Zone, if an applicant asserts that the application of the policies of the LCP or this Plan does not provide reasonable use of property, then the applicant must obtain an economic viability use determination pursuant to Article II, Section 35-194¹ before any exemption may be granted. For any policies or development standards within this Plan which specifically provide an exemption for "reasonable use of property," similarly the applicant must obtain an economic viability determination pursuant to Article II, Section 35-194 before any exemption may be granted.*

This alternative language is intended to address issues where exceptions may be necessary to avoid an unconstitutional taking of private property. The revised policy for the Coastal Zone also provides direction to follow the existing method in Article II to address these issues.~~The policy change would serve to direct land improvements in the Coastal Zone to follow the Coastal Act (CLUP and Article II) as amended with adoption of the proposed Plan. In addition, future~~

¹ The proposed policy alternative refers to the economically viable use determination described in Article II under the Toro Canyon Plan Overlay. Should this alternative be incorporated into the project, equivalent language would be incorporated into Article II under the GAV Overlay.

~~proposals for land improvements would be required by revised policy LU-2 to be consistent with both the adopted CLUP and Article II.~~

Alternative 1 would include the GAV Overlay amendments to Article II detailed in Appendix I and would include use definitions, including the uses defined in the Gaviota Agricultural Permit Tiers. These amendments would further ensure the uses, if adopted, would be consistent with the CLUP and Article II. The GAV Overlay includes a new section on exempt activities and structures that is modeled on language previously approved by the Coastal Commission.

~~The primary difference with Alternative 1 is new GAV Overlay also includes a division of permitted uses (uses not requiring a conditional use permit) in the new GAV Overlay into Principal Permitted Uses versus Permitted Uses. As described in Section 6.2.2.1, a Principal Permitted Use (PP): A use that clearly carries out the designated land use and the intent and purpose of a particular zone, and would require. An action to approve or conditionally approve a Coastal Development Permit (CDP) application for a use designated PP that is not subject to appeal to the Coastal Commission, except as specified in Section 35-182 (Appeals) of Article II. A Permitted Use (P): An action to approve or conditionally approve would require a Coastal Development Permit application for a use designated as P is and would always be subject to appeal to the Coastal Commission.~~

Section 35-440B would establishes primary dwellings as a PP use if:

- a. There is an existing principal permitted primary agricultural use on the lot on which the primary dwelling is located.
- b. The occupancy of the dwelling is restricted to the operator of the principal permitted primary agricultural use including the family of the operator, or the owner of the lot including the dependent family of the owner.
- c. The gross floor area of the primary dwelling does not exceed 5,000 square feet.
- d. The primary dwelling and all accessory structures and landscaping associated with the primary dwelling shall occupy a development area of no more than 10,000 square feet.

If compliance with these standards cannot be demonstrated, the primary dwelling may be permitted as P use, subject to appeal to the Coastal Commission.

~~The Alternative 1 amendments also include a new section criteria that must be satisfied in order for school facilities to be allowed with a Major Conditional Use Permit in the AG-II zone and on exempt activities and structures that is modeled on the language approved by the Coastal Commission as part of an effort the attempt to have certify the LUDC be certified for the Coastal Zone and replace Article II.~~

~~Alternative 1 would clarify land uses appropriate to the Coastal Zone similar to the proposed Plan for the rest of the Plan Area. Clarification of permitted uses and separation of uses into those principally permitted or permitted, while beneficial would not result in result in lesser impacts to agricultural conversions or result in land use conflict impacts and would be similar to those identified in the EIR for the same uses in the proposed Plan. Principally Permitted Uses would be those most compatible with the land use designation, while a higher level of permit review would be required for those uses less compatible. Thus, impacts to land use under Alternative 1 would be less in the Coastal Zone than the proposed project.~~

~~Section 35-440.D: Includes criteria that must be satisfied in order for school facilities to be allowed with a Major Conditional Use Permit in the AG-II zone. This is also modeled on the language previously approved by the Coastal Commission. It also includes permit requirements and development standards for new uses that may be allowed on AG-II zoned land within in the Gaviota Coast Plan Area in addition to agricultural employee housing, agricultural processing facilities, aquaculture, rural recreation, and winery uses that are currently allowed. These new uses are detailed in Appendix I.~~

~~Alternative 1 would clarify land uses appropriate to the Coastal Zone similar to the proposed Plan for the rest of the Plan Area. Clarification of permitted uses while beneficial would not result in result in lesser impacts to agricultural conversions or result land use conflict impacts and would be similar to those identified in the EIR for the same uses in the proposed Plan.~~

~~Section 35-440B establishes primary dwellings as a PP use if:~~

- ~~a. There is an existing principal permitted primary agricultural use on the lot on which the primary dwelling is located.~~
- ~~b. The occupancy of the dwelling is restricted to the operator of the principal permitted primary agricultural use including the family of the operator, or the owner of the lot including the dependent family of the owner.~~
- ~~c. The gross floor area of the primary dwelling does not exceed 5,000 square feet.~~
- ~~d. The primary dwelling and all accessory structures and landscaping associated with the primary dwelling shall occupy a development area of no more than 10,000 square feet.~~

~~If compliance with these standards cannot be demonstrated, the primary dwelling may be permitted as P use, subject to appeal to the Coastal Commission.~~

Aesthetics/Visual Resources

~~As in the proposed Plan, Alternative 1 would amend Article II to add the "CVC - Critical Viewshed Corridor Overlay District" to the existing overlays. It would also include the Gaviota Coast Plan Area in the list of areas in Section 35-139 (Exterior Lighting) that have additional~~

requirements regarding exterior lighting, and it would add additional requirements regarding projects in the Coastal Zone that require review by the Board of Architectural Review. Therefore, Alternative 1 would result in similar ~~reduced~~-aesthetics impacts when compared with the proposed Plan.

Agricultural Resources

Related to agricultural resources, Alternative 1 would revise proposed Plan Policy AG-1.H applicable to the Coastal Zone in the Plan Area:

~~(Revised)~~ **Policy AG-1.H (Inland): Land Improvement Programs.** *To increase agricultural productivity, the County should encourage land improvement programs.*

Policy AG-1.H (Coastal): Land Improvement Programs. ~~(COASTAL) The Policies and Development Standards of this Plan~~ Land improvement programs shall be implemented in a manner consistent with the Coastal Land Use Plan.

~~The policy change would serve to ensure land improvement programs in the Coastal Zone to follow the Coastal Act (CLUP and Article II) as amended with adoption of the proposed Plan. This change would clarify that all agricultural land use improvements and regulations in the Coastal Zone are implemented in a manner consistent with the CLUP, which includes policies that are consistent with the Coastal Act to protect agricultural resources.~~ The analysis in Section 4.4 of this EIR found that proposed Plan buildout and rezones could result in potentially significant but mitigable impacts to agricultural resources due to the direct conversion of prime agricultural land to non-agricultural use (AG-1) and land use compatibility at the agricultural interface (AG-2).

As discussed above, the GAV Overlay would clearly set out allowable and permitted land uses in the Coastal Zone ~~including on agricultural zoned land. The amendments by~~ including language to implement the Agricultural Permit Process Streamlining Ordinance Amendment adopted by the County for the non-Coastal Zone area in 2009 that relates the requirement to process a Development Plan to the lot size of the project and the type of development proposed.

Alternative 1 includes regulations regarding animal-keeping that is modeled on the language approved by the Coastal Commission. This includes language addressing “confined animal facilities” and factors that determine when such facilities associated with the animal-keeping are considered a PP versus a P use.

As described above, the Alternative 1 GAV Overlay ~~Article I~~ includes permit requirements and development standards for new uses that may be allowed on AG-II zoned land within in the Plan Area in addition to agricultural employee housing, agricultural processing facilities, aquaculture, rural recreation, and winery uses that are currently allowed. These additional activities, like

those described in the proposed Plan would support the primary agricultural use of the land and reduce conversions to other primary uses.

The GAV Overlay also would establish criteria to determine when the primary dwelling on a lot may be considered as a component of the principal permitted agricultural use of the lot and, therefore, also qualify as a principal primary use and was modeled on language previously approved by the Coastal Commission.

Policies and development standards applicable to agricultural land improvement programs would be similar with implementation of Alternative 1 and under the proposed Plan. Therefore, impacts from Alternative 1 related to conversion of agricultural land and land use conflicts at the agricultural interface are expected to be similar to the proposed Plan.

The GAV Overlay, Section 35-420.D.3, ~~will~~ would establish an exemption from the requirement to obtain a Coastal Development Permit,² for certain development and uses (listed below and in Appendix I) as part of existing, on-going lawfully established agricultural operations, explicit below and in Appendix I. Some of these uses are exempt under the existing Article II. Others are proposed under Alternative 1 and highlighted in *italics*. ~~the following development and uses are exempt from the requirement to obtain a Coastal Development Permit,³ except as provided in Subsection D.1 (Exemption does not apply). In the Coastal Zone portion of the Gaviota Coast Plan Area, new or expanded areas of agricultural activities are not exempt and require the issuance of a Coastal Development Permit in compliance with Section 35-169 (Coastal Development Permits) unless they are in compliance with Subsection D.3.e (Cultivated, agricultural, orchards and vineyards, new or expanded areas) or D.3.i (Grazing, new or expanded areas), explicit below and in Appendix I.~~

- a. Agricultural accessory structures.
 - 1) One story detached accessory structures used as tool or storage sheds and similar structures, provided that the height does not exceed 12 feet, roof area does not exceed 120 square feet, and the structure does not have electrical, gas or plumbing facilities.
 - 2) In the AG-II and RR zones, agricultural accessory structures that are roofed and supported by posts or poles, do not exceed 500 square feet of roof area, are unenclosed on all sides, and do not have plumbing or electrical facilities.
- b. *Agricultural product sales. See Section 35-450.E (Agricultural Product Sales).*

² Consistent with Coastal Act Section 30610(e).

~~³ Consistent with Coastal Act Section 30610(e).~~

- c. *Animal keeping. Animal keeping when shown as an "E" in Table X-6 (Animal Keeping in the Gaviota Coast Plan Area) in compliance with Section 35-440.A (Animal Keeping), not including confined animal facilities except for confined animal facilities associated with exempt household pet animal keeping, or unless a confined animal facility is otherwise exempt in compliance with this Subsection D (Exempt activities and structures).*
- d. *Cultivated agricultural, orchards and vineyards, historic legal use. Cultivated agriculture, orchards and vineyards where the agricultural activities occur within existing areas of cultivated agriculture, orchards, and vineyards.*
- e. *Cultivated agricultural, orchards and vineyards, new or expanded areas. New cultivated agriculture, orchards and vineyards where the agricultural activities do not occur within existing areas of cultivated agriculture, orchards, and vineyards may also be exempt if the development of new cultivated agriculture, orchards or vineyards:*
- 1) *Does not occur on slopes of 30 percent or greater or require any cut or fill that exceeds three feet in vertical distance or require grading over 100 cubic yards. For the purposes of this Subsection D.3.e (Cultivated agricultural, orchards and vineyards, new or expanded areas), grading includes cut and fill but does not include tilling of the soil.*
 - 2) *Is not located within 100 feet of the top of bank of any creek, stream or watercourse.*
 - 3) *Is not located within 100 feet of environmentally sensitive habitat areas, riparian areas, or wetlands.*
 - 4) *Does not result in the removal of native or non-native protected trees.*
- f. *Fences, gates, gateposts, and walls. See Section 35-123 (Fences, Walls and Gate Posts).*
- g. *Grading. Grading activities of 50 cubic yards or less that do not require the approval of a Grading Permit.*
- h. *Grazing, historic legal use. Grazing when located in existing grazing areas, including the normal rotation of livestock from one pasture to another.*
- i. *Grazing, new or expanded areas. New grazing located outside of existing grazing areas may also be exempt if the grazing:*
- 1) *Does not occur on slopes of 30 percent or greater or require any cut or fill that exceeds three feet in vertical distance or require grading over 100 cubic yards. In this case, grading includes cut and fill but does not include tilling of the soil.*

- 2) *Is not located within 100 feet of the top of bank of any creek, stream or watercourse.*
 - 3) *Is not located within 100 feet of environmentally sensitive habitat areas, riparian areas, or wetlands.*
 - 4) *Does not result in the removal of native or non-native protected trees.*
- j. Irrigation lines. The installation of irrigation lines.
- k. Propane tanks. Propane tanks located in residential or agricultural zones.
- l. *Signs, flags, and similar devices.*
- 1) *Signs, flags and similar devices in compliance with Section 35-138 (Signs and Advertising Structures), provided the development does not exceed a maximum height of 35 feet and is not lighted.*
 - 2) *Signs that may be permitted in compliance with Section 35-138 (Signs and Advertising Structures) that are proposed to be affixed to existing, lawfully constructed structures*

In the Coastal Zone portion of the Gaviota Coast Plan Area, new or expanded areas of agricultural activities are not exempt and require the issuance of a Coastal Development Permit in compliance with Section 35-169 (Coastal Development Permits) unless they are in compliance with Subsection D.3.e (Cultivated, agricultural, orchards and vineyards, new or expanded areas) or D.3.i (Grazing, new or expanded areas), cited above. Combined with the other components of Alternative 1, which primarily address permit requirements and procedures and CLUP policy consistency rather than development buildout, less than significant impacts to agricultural resources would be similar to those resulting from the proposed project.

Biological Resources

Alternative 1 would be consistent with the proposed Plan objectives to enhance protection of ~~enhance~~ interconnected habitat areas and watersheds from the ridgeline to the ocean. The existing ~~1982~~ Comprehensive Plan and CLUP contain policies that call for the protection of sensitive biological resources (see Table 5.2-1). The County's ESH designation is applied to areas with unique natural resources and/or sensitive animal or plant species.

In comparison, the proposed Plan outlines specific criteria for vegetation communities and other natural habitats that would be included in the ESH overlay zone. However, compliance with proposed Plan policies is not anticipated to completely avoid the conversion of areas supporting sensitive vegetation communities. In addition, it is unknown if feasible on-site or off-site mitigation opportunities will be available at the time a development project is proposed.

Plan Policy NS-10, Habitat Buffers, states that buffer policies should be flexible and consider the purpose, ecological benefit, and context of the buffer as well as the use of the land next to the buffer. The analysis in Section 4.6 of this EIR determined that proposed Plan policies did not go far enough in ensuring that during review of all development in the Coastal Zone any areas not mapped as ESH, but found to be ESH during the application review process, shall be afforded all the protection provided for ESH in the applicable zoning ordinances and CLUP. In addition, the proposed Plan was found to not ensure that any ESHA area mapped, or otherwise identified through historic evidence, shall not be deprived of protection as ESH, as required by the policies and provisions of the CLUP, on the basis that habitat has been illegally removed, degraded, or species that are rare or especially vulnerable because their nature or role in an ecosystem have been eliminated.

Analysis contained in Section 4.6 of this EIR determined that proposed Plan policies are not considered sufficient to reduce the potential proposed Plan wide impacts on biological resources to a level of less than significant; potential impacts would remain significant and unavoidable, with mitigation.

Alternative 1 would revise proposed Plan policies to ~~ensure~~ further their consistency with the existing policies in the certified CLUP and to assure protection of ESH in the Coastal Zone.

Implementation of Alternative 1 would ensure that proposed land improvements in the Coastal Zone would be reviewed on a case-by-case basis consistent with the CLUP. However, Alternative 1 would have fewer significant impacts to biological resources in the Coastal Zone than the proposed Plan due to the additional protections applied to historic ESH areas in the Coastal Zone.

Parks, Recreation, and Trails

As discussed above, the new GAV Overlay amendments to Article II include new language regarding the development of uses. These uses include rural recreation including campgrounds, fishing, guest ranch stays, horseback riding and other low-intensity recreational development such as hiking trails, public riding stables, and recreational camps within the Plan Area on property zoned AG-II. These uses are required to be supportive of the primary agricultural use of the land.

While the new GAV Overlay amendments would serve to clarify land use and implementation of development standards in the Coastal Zone, they would include similar requirements to those in the proposed Plan. Therefore, Alternative 1 would result in similar impacts to the proposed Plan in regards to parks, recreation, and trails.

Flooding and Water Resources

The existing ~~1982~~ Comprehensive Plan and CLUP contain policies and mitigation measures addressing flooding, runoff, drainage, and water and groundwater quality in the Coastal Zone

(see Table 5.2-1). All future projects within the Coastal Zone would be required to comply with the County Floodplain Management and Water Course Setback ordinances, the County Grading Code Ordinance, County Groundwater Thresholds Manual, County Environmental Health Services Onsite Wastewater Treatment Systems regulations in the Local Area Management Plan for private on-site wastewater treatment systems and show conformance with Comprehensive Plan policies.

The analysis in Section 4.7 found no significant and unavoidable impacts from flooding (WR-1), runoff (WR-2), water quality (WR-3), and groundwater supply (WR-4) would result from buildout of the proposed Plan.

Under Alternative 1, new and revised Plan policies and development standards addressing hydrology and water quality, as described in Section 4.7, that ensure consistency with recent changes to the CWA and NPDES requirements addressing water quality, would be included in the CLUP and Article II amendments. Alternative 1, when compared to the proposed Plan, would include similar water quality and flood control policies and development standards to the proposed Plan. Therefore, Alternative 1 would have similar flooding, runoff, drainage, water quality impacts, and equally address sea level rise hazards impacts and mitigation.

Other Environmental Topics Considered

This analysis also considered Alternative 1 for its potential to reduce proposed Plan impacts to Transportation and Circulation, Cultural Resources, Air Quality and Greenhouse Gas Emissions; Public Services and Facilities; Noise; Geologic Hazards; and Hazardous Materials and Risk of Upset. Under Alternative 1, the proposed project in the Inland Area would be the same. In the Coastal Zone, Alternative 1 would support the same proposed land use and zoning changes and the same potential buildout. The revised policies for the Coastal Zone, which focus on resource protection, would have no effect on the issue areas listed here. Revised permit requirements and procedures under Alternative 1 would also not affect buildout. The review found that ~~Therefore,~~ implementation of Alternative 1 would have similar impacts to these resources as implementation of the proposed Plan.

6.2.3 Alternative 2

6.2.3.1 Description

The proposed Plan would provide protection for and enhancement of the natural resources of the Plan Area, support agricultural viability, and increase public access throughout the Plan Area while preserving the rural character of Gaviota Coast. The proposed Plan also describes the prospect for an even greater level of achievement of these objectives through protection of natural, agricultural, and cultural resources and recreational access. Alternative 2 explores the likelihood of significant effects on visual and biological resources, and recreation, and prioritizes conservation of the area's resources and character when considering development proposals. It

includes different policy approaches that are capable of a higher level of conservation and better access to the coast in the Plan Area as described below and in Tables 6-2 and 6-3:

- Afforded the highest protection to natural, agricultural, and recreational access;
- Maximize acquisition of public bluff-top open space;
- Protect and expand coastal access, and acquire easements for and develop a nearshore California Coastal Trail;
- Plan for expansion of visitor serving uses, particularly campgrounds at suitable locations;
- Identify properties suitable for public acquisition for recreation and protection of habitats, view corridors and open space;
- Ensure habitat and where appropriate, trail connectivity between coastal areas and Los Padres National Forest; and
- Require that new structures and improvements be integrated with the surrounding environment to the greatest possible extent to maintain the character of the community.

Table 6-2. Changes to Plan Policies and Actions	
Alternative 2	Description
<p>Revised Action AG-6: Agricultural Tourism. The County shall develop and <u>implement</u> necessary policies to enable and promote agricultural tourism where: 1) such activities will promote and support the primary use of the land as agriculture and minimize conflicts with on-site or adjacent agricultural production; 2) <u>existing infrastructure (i.e., adequate water supply, sewage disposal, road access and capacity and other services) is available</u>; and 3) such activities shall have no significant adverse impacts on environmental quality or natural habitats.</p>	<p>Action AG-6: Agricultural Tourism. The County shall develop necessary policies to enable and promote agricultural tourism where such activities will promote and support the primary use of the land as agriculture and minimize conflicts with on-site or adjacent agricultural production or significantly adverse impacts to the environment.</p>
<p>Revised Dev Std AG-1: Protection of Agricultural Resources. On land zoned for agriculture, non-agricultural development should be directed to those areas least suitable for agriculture. <u>Both agricultural and nonagricultural structural development and associated hardscape shall be prohibited on prime soils to the maximum extent feasible. Avoiding (or minimizing where complete avoidance is not feasible) the covering of prime soils shall be accomplished first through site selection, then</u> through site and building design, and shall use pervious surfaces wherever feasible.</p>	<p>Dev Std AG-1: Protection of Agricultural Resources. On land zoned for agriculture, non-agricultural development should be directed to those areas least suitable for agriculture. Non-agricultural structural development and associated hardscape shall be minimized on prime soils to the maximum extent feasible. Minimizing the covering of prime soils shall be accomplished through site selection, site and building design, and the use of pervious surfaces wherever feasible.</p>
<p>Revised Policy LU-2: Policy Implementation. The Policies and Development Standards of the Gaviota Coast Plan shall be implemented in a manner that <u>evaluates whether a restriction would provide an economically viable use of property as a result of the application of the policies and standards contained in the Plan or LCP.</u></p>	<p>Policy LU-2: Policy Implementation. The Policies and Development Standards of the Gaviota Coast Plan shall be implemented in a manner that does not take private property for public use without just compensation as required by applicable law.</p>
<p>Revised Policy NS-6: Wildlife Corridors. Development shall <u>avoid to the extent feasible and otherwise</u> minimize disruption of identified wildlife travel corridors.</p>	<p>Policy NS-6: Wildlife Corridors. Development shall minimize disruption of identified wildlife travel corridors.</p>

Table 6-3. Additional Policies and Actions	
	Policy LU-X: Sea Level Rise and Bluff Retreat. The County shall analyze and mitigate to the extent feasible sea level rise and bluff retreat impacts on all new coastal development proposals through the imposition of rolling easements and other tools to accommodate sea level rise into the future.
	Policy REC-X Acquisition of Coastal Lands for Conservation. The County shall identify parcels of coastal open space in the Gaviota Coast Plan Area planning area that are suitable for conservation and prioritize them for acquisition when and if funds become available.
	Policy REC-X: Policy LU-X: Sea Level Rise and Bluff Retreat. The County shall analyze direct and indirect impacts of accelerating bluff erosion on recreation facilities, including secondary impacts of increased sea level rise and coastal erosion on lateral and vertical access.
	Policy REC-X Protection of Existing Public Coastal Accessways. Recognize existing public coastal accessways, both public and private, as an integral part of the County's overall <u>coastal</u> access program. Maintain existing public accessways. Consider closure of existing County-managed accessways only if authorized by a coastal permit and only after the County has offered the accessway to another public or private entity. Investigate and take action to abate any unauthorized signs, structures or activities that improperly discourage or prohibit public coastal access and use. Require development projects proposed on lands that include a County maintained trail or route be required to dedicate easements or make improvements.
	Policy REC-X Use of Railroad Corridor for Lateral Access. The County shall identify locations on the Gaviota Coast where public lateral trails are not otherwise available and could be located safely along the R railroad rights-of-ways, including trails that would require safety improvements. The County shall approach the Union Pacific Railroad and Public Utilities Commission to gain authorization for formal trail segments in these areas and identify funding sources in its assessment of the impacts of the Plan on existing and planned recreation.
	Policy REC-X Public Recreation and Open Space Protection. The County should protect public recreation and open space by: <ul style="list-style-type: none"> a. Maximizing acquisition of public blufftop open space; b. Protecting and expanding coastal access and acquiring easements for and developing a nearshore California Coastal Trail; c. Planning for expansion of visitor serving uses, particularly campgrounds at suitable locations; d. Identifying key properties suitable for public acquisition for recreation and protection of habitats, view corridors and open space; and e. Ensuring habitat and where appropriate, trail connectivity between coastal areas and Los Padres National Forest
	Action REC-X Railroad Crossings. The County shall identify locations where access across, over or under the Union Pacific Railroad is necessary or desirable to allow for public access to the beach, along the bluff, and for trail connectivity. The County shall identify and utilize preferred methods to approach the Union Pacific Railroad and the Public Utilities Commission to gain authorization for finalized crossings in these areas and identify identified funding sources in its assessment of the impacts of the Gaviota Coast Plan on existing and planned recreation.
	Action REC-X: The County shall assess the impacts of development permitted under the land use designations and from existing certificates of compliance on recreation and the potential for such development to directly block existing access trails and routes. The temporal disconnect between the approval and completion of development should be mitigated during construction of the development until the actual completion of the new trail system.
	Policy TEI-X: Pedestrian, Bicycle, and Transit System Plan. The County shall develop a Pedestrian, Bicycle, and Transit System Plan consistent with the Regional Transportation Plan for the area and that identifies trails and routes considered a part of County maintained circulation system.
	Policy TEI-X: Performance Standards for Existing Facilities. The County shall develop methods and adopt standards to assess the performance of existing pedestrian, bicycle, and transit facilities.
	Policy LU-X: Sea Level Rise and Bluff Retreat. The County shall analyze and mitigate to the extent feasible sea level rise and bluff retreat impacts on all new coastal development proposals through the imposition of rolling easements and other tools to accommodate sea level rise into the future.
	Policy REC-X Acquisition of Coastal Lands for Conservation. The County shall identify parcels of

Table 6-3. Additional Policies and Actions

<p>coastal open space in the Gaviota Coast planning area that are suitable for conservation and prioritize them for acquisition when and if funds become available.</p> <p>Policy REC-X: Policy LU-X: Sea Level Rise and Bluff Retreat. The County shall analyze direct and indirect impacts of accelerating bluff erosion on recreation facilities, including secondary impacts of increased sea level rise and coastal erosion on lateral and vertical access.</p> <p>Policy REC-X Protection of Existing Public Coastal Accessways. Recognize existing public coastal accessways, both public and private, as an integral part of the County's overall access program. Maintain existing public accessways. Consider closure of existing County-managed accessways only if authorized by a coastal permit and only after the County has offered the accessway to another public or private entity. Investigate and take action to abate any unauthorized signs, structures or activities that improperly discourage or prohibit public coastal access and use. Require development projects proposed on lands that include a County maintained trail or route be required to dedicate easements or make improvements.</p> <p>Policy REC-X Use of Railroad Corridor for Lateral Access. The County shall identify locations on the Gaviota Coast where public lateral trails are not otherwise available and could be located safely along the Railroad right of ways, including trails that would require safety improvements. The County shall approach the Union Pacific Railroad and Public Utilities Commission to gain authorization for formal trail segments in these areas and identify funding sources in its assessment of the impacts of the Plan on existing and planned recreation.</p> <p>Policy TEI-X: Siting of New Facilities. All new facilities and related support structures shall be sited, designed, and operated to avoid visibility of the facility from public viewing areas, and to preserve the character of surrounding areas by protecting ridgelines by setting facilities below the ridge, and co-locating facilities, where feasible, to avoid proliferation of facilities.</p>

6.2.3.2 Impact Analysis

A summary of the impacts of Alternative 2, in comparison to the proposed Plan, is provided in Table 6-1. The impacts analysis of Alternative 2 focuses on the environmental issue areas identified in Chapter 4.0 that would be potentially altered by the alternative. Several issue areas impact levels would have similar impacts to the proposed Plan and are summarized at the end of the analysis.

Land Use

Alternative 2 includes a revision to proposed Plan ~~p~~Policy LU-2 removing reference to property takings and including language requiring evaluation during Plan implementation of whether proposed Plan restrictions would provide an economically viable use of property, consistent with the Coastal Act. In comparison, the proposed Plan's existing ~~p~~Policy LU-2 is not consistent with the Coastal Act in this regards. This language addresses property rights related to land use regulations and would not regulate land use in a manner that would result in an environmental impact. Alternative 2 would strengthen the proposed Plan's approach to natural resources enhancement, agricultural viability, and increased public access in the Plan Area by strengthening proposed Plan policies and actions pertaining to land use, recreation, circulation, and facilities, and by adding additional policies addressing sea level rise and bluff retreat, and protection for existing public coastal access. Alternative 2 also includes a new policy directing acquisition of public bluff-top open space and planning for the expansion of the nearshore Coastal Trail and expanding visitor serving campground uses. Alternative 2 would, therefore,

result in greater consistency with the land use and land use policies in the Coastal Act and CLUP than the proposed Plan.

Transportation and Circulation

As discussed above, Alternative 2 calls for increased agricultural tourism in the Plan Area. Additional tourism would lead to additional traffic on rural roads in the Plan Area. Therefore, it can be reasonably be anticipated that this alternative would lead to greater impacts of the proposed Plan on local roadways, if future efforts to promote the Gaviota Coast as ~~a~~ an agricultural tourism destination were to occur. Therefore, Alternative 2 could result in increased traffic area roads and lead to increased safety conflicts ~~impacts~~ on roadways and at unimproved, intersections.

Alternative 2 also identifies new policies, actions, and standards that call for development of (1) a pedestrian, bicycle, and transit system plan that identifies trails and routes, ~~and~~ (2) standards to assess the performance of existing facilities, (3) identify locations along the Coast to provide crossings over or under the Union Pacific Railroad, and (4) lateral access for trails alongside of the existing railway. By identifying safe coastal access across the Union Pacific Railway, planned pedestrian, trails, bicycle, and transit system and performance standards for existing facilities, Alternative 2 would increase potential for overall multi-modal transportation and circulation system wide safety throughout the Plan Area beyond the system detailed in the proposed Plan. Therefore, Alternative 2 would result in fewer transportation system safety-related impacts than the proposed Plan.

Agricultural Resources

Alternative 2 would revise the language in proposed Plan Action ~~Ag~~AG-6, Agricultural Tourism, to provide additional language directing development and implementation of agricultural tourism policies, and to limits such use to locations with existing infrastructure, and activities that will have no significant impacts. Alternative 2 would also strengthen regulatory protection of prime soils in proposed Plan DevStd AG-1 by prohibiting development on such soils, to the extent feasible, by ensuring over the counter permits prohibit building placement on prime soils. Therefore, Alternative 2 would result in fewer impacts to prime soils than would the proposed Plan.

~~The addition of~~ With additional clarifying tourism language, Alternative 2 would not be expected to lead to a significant expansion of land uses beyond those already described in the Gaviota Agricultural Permit Tiers. The expansion of tourism uses beyond those in the AG zones and the farmstays, educational uses, and tours described in the Gaviota Agricultural Permit Tiers, would be developed ~~in~~ through a separate public process and undergo separate environmental review for potential land use, transportation, and natural resources impacts at that time. Therefore, the addition of clarifying language to Action AG-6 would have the same impact to agricultural resources as the language in the proposed Plan.

Alternative 2 does not propose additional trail corridors or beach access points, nor does it identify specific locations as additional potential sites for recreational development. Alternative 2's proposed recreation policies and actions directing the County to further efforts to obtain and develop trail easements and prioritize acquisition of land for blufftop open space would still need to comply with other components of the plan, including Coastal Trail Alignment general principles and the Trail Siting Guidelines. These principles and guidelines direct consideration of siting in a manner that minimizes conflicts with agricultural uses; therefore, impacts to agricultural resources would be similar as to those identified for the proposed Plan.

Aesthetics/Visual Resources

Alternative 2 would include a new facilities siting policy that would require all new facilities and related support structures ~~shall to~~ be sited, designed, and operated to avoid visibility of the facility from public viewing areas, and to preserve the character of surrounding areas by protecting ridgelines by setting facilities below the ridge, and co-locating facilities, where feasible, to avoid proliferation of facilities.

As discussed in Section 4.3 of this EIR, the proposed Plan buildout and rezones would result in significant but mitigable impacts to Visual and Aesthetic Resources (Visual Character Changes, Public Scenic Views, Routes, and Gateways; and Increased Light and Glare) and Cumulative Impacts to Visual and Aesthetic Resources (Visual Character Changes, Public Scenic Views, Routes, and Gateways; and Increased Light and Glare). All these impacts were found to mitigated to less than significant with implementation of the proposed Plan policies, actions, and development standards.

As also discussed in Section 4.3 of this EIR, the proposed Plan would include several new and/or revised policies and objectives addressing aesthetics and visual impacts, including: considerations for viewsheds, building site location, and urban design; new policies for the design of residential, commercial, and mixed-use development; and policies protecting local scenic routes, gateways, and trails; and preservation of scenic views with new development.

Alternative 2 would include a proposed policy programming for overall multimodal transportation and circulation system that would have the potential to create urban style infrastructure in the Plan Area. Alternative 2 also anticipates the potential for construction of new facilities that are inconsistent with the coastal open space and visually unique character of the Plan Area and therefore includes a policy to ~~by extending~~ site design and ridgeline protections to all new facilities in the Plan Area. Therefore, Alternative 2 would result in fewer impacts than would the proposed Plan related to the siting of all facilities.

Biological Resources

Alternative 2 includes Revised Policy NS-6 pertaining to wildlife corridors. Revised Policy NS-6 requires that development shall avoid to the extent feasible and otherwise minimize disruption of identified wildlife travel corridors. This revision strengthens the existing policy which could be

interpreted to allow for the disruption of wildlife travel corridors. Therefore, revised Policy NS-6 would result in fewer impacts to wildlife corridors than the proposed Plan.

Alternative 2 identifies several options to address planning for visitors to the Plan Area, including multimodal transportation system and transit and facilities, that are not included in the proposed Plan. Alternative 2 would strengthen the proposed Plan's approach to natural resources enhancement, agricultural viability, and increased public access in the Plan Area by strengthening proposed Plan policies and actions pertaining to land use, recreation, circulation, and facilities, and by adding additional policies addressing sea level rise and bluff retreat, and protection for existing public coastal access. Alternative 2 also includes a new policy directing acquisition of public bluff-top open space and planning for the expansion of the nearshore Coastal Trail and expanding visitor serving campground uses.

Alternative 2 would serve to help direct visitor uses to designated areas and reduce visitor intrusion into sensitive habitat areas through increased planning efforts beyond those specified in the proposed Plan. Therefore, Alternative 2 would result in fewer significant impacts to biological resources than would the proposed Plan.

Flooding and Water Resources

Alternative 2 includes additional policies to analyze and mitigate to the extent feasible sea level rise and bluff retreat impacts on private development proposals and recreation facilities. Alternative 2 also requires analyses of secondary impacts from increased revetment or seawall construction on lateral and vertical access. Alternative 2 provides additional guidance regarding mitigation options to address sea level rise and bluff retreat for primary and secondary impacts, beyond those anticipated in the proposed Plan. Therefore, Alternative 2 would have fewer flooding and water resources impacts in regards to sea level rise and its effects on future coastal land uses than would the proposed Plan.

Parks, Recreation, and Trails

Alternative 2 would strengthen the proposed Plan's approach to increased public access in the Plan Area by strengthening proposed Plan policies and actions pertaining to the planning of coastal and inland recreation, circulation, and facilities, and by adding additional policies addressing sea level rise and bluff retreat, and protection ~~for~~ of existing public coastal access. Alternative 2 does not propose additional trail corridors or beach access points, nor does it identify specific locations as additional potential sites for recreational development. As discussed above, Alternative 2 also identifies several options to address planning for visitors to the Plan Area, including multimodal transportation system and transit and facilities, that are not included in the proposed Plan. ~~Alternative 2 would thereby strengthen the proposed Plan's approach to increased public access in the Plan Area by strengthening proposed Plan policies and actions pertaining to land use, recreation, circulation, facilities, and adding additional policies addressing sea level rise and bluff retreat, and protection for existing public coastal access.~~

Alternative 2 also anticipates the need to protect, recognize and maintain existing public coastal access, both public and private, as an integral part of the County's overall access program. To address this issue Alternative 2 includes a policy to require a coastal permit for any removal of such access to obtain a coastal permit and only after the County has offered the access to another public or private entity. Alternative 2 also requires that the County investigate and take action to abate any unauthorized signs, structures, or activities that improperly discourage or prohibit public coastal access and use. Alternative 2 would require development projects proposed on lands that include a County maintained trail or route be required to dedicate easements or make improvements.

Alternative 2 also includes a new policy directing acquisition of public bluff-top open space, and planning for the expansion of the nearshore Coastal Trail and expanding visitor serving campground uses. Alternative 2 would, therefore, result in greater consistency with public access, recreation, and Coastal Trail policies in the Coastal Act and CLUP than the proposed Plan. Therefore, by anticipating and mitigating for potential impacts related to potential closure of existing public beach access and trails on private and public lands and ensuring new such access is well-planned in the future, ~~beyond that anticipated by the proposed Plan.~~ Alternative 2 would result in fewer impacts ~~to~~ related to public access, recreation, and trails than would the proposed Plan.

Other Environmental Topics Considered

This analysis also considered Alternative 2 for its potential to reduce proposed Plan effects on Air Quality and Greenhouse Gas Emissions; Cultural Resources, Public Services and Facilities; Noise; Geologic Hazards; and Hazardous Materials and Risk of Upset. Under Alternative 2, land use and zoning designations would be the same as with the proposed Plan; thus, potential buildout would be the same. The proposed new and revised policies under Alternative 2 focus on enhancing protection of biological and agricultural resources, and recreational access. The review found that ~~As a result,~~ implementation of Alternative 2 would have similar impacts to these resources as implementation of the proposed Plan.

6.2.4 Alternative 3

6.2.4.1 Description

Alternative 3 includes the addition of a program to the proposed Plan that would allow second dwelling units in exchange for landowners who take actions to restore habitat, provide for trails, or preservation ~~ation~~ of historic resources on their properties. The proposed Plan provides protection for, and enhancement of, the natural resources of the Plan Area, supports agricultural viability, and increases public access throughout the Plan Area while preserving the rural character of Gaviota Coast. ~~The proposed Plan also~~ Alternative 3 describes the prospect for an even greater level of achievement of these objectives through additional voluntary landowner actions that provide a demonstrated public benefit. This may be achieved through the creation of an incentive-based program for the Gaviota Coast. As envisioned, the incentive framework ranges

from encouraging agricultural conservation easements (ACE), to dedication of public trails, to the restoration, maintenance, and landmark designation of historic structures.

Alternative 3 identifies additional opportunities for landowners to provide beneficial actions of a public benefit in exchange for an incentive that builds upon the phase I program described in Action LU-5 (Land Use Incentives Program-Phase I) and would satisfy the criteria laid out in Action LU-4 (Land Use Incentive Program) and reproduced below. The importance of acquiring California Coastal Trail easements results in a proposed additional incentive allowing landowners to apply for two residential second units as described below.

Land Use Incentives Program – Criteria

Pursuant to proposed Plan Action LU-4:

- a. The program should be voluntary;
- b. The program should substantially further Coastal Act and County goals and policies with respect to resource protection, habitat preservation and restoration, public access, viewshed protection, improved land management, and agricultural sustainability; and
- c. The program would be in addition to an individual project's required actions to satisfy mitigation measures and conditions of approval required by agencies.

In addition to the core principles identified above, the following general principles should be considered for developing and structuring the program.

1. The landowner action(s) should be in proportion to the benefits granted to the landowner;
2. The landowner actions(s) should be a public benefit;
3. The required landowner improvements shall be long-lasting, if not permanent;
4. Preference to tie the landowner improvement to the premises impacted or to achieve a regional benefit;
5. The improvement shall be real, tangible, and funded;
6. Prioritize landowner actions and eligible incentives that can feasibly be implemented within the Plan Area; and
7. Consider development of in-lieu fee programs resulting in public benefits as an alternative.

Expanded Land Use Incentives Program

The Gaviota Coast Plan project description includes Action LU-5: Land Use Incentives Program-Phase I (Table 6-4). Alternative 3 builds upon Action LU-5_4-to include LUDC and Article II ordinance amendments for the following expanded-land use incentives that warrant the ability to apply for a residential second unit on AG-II zoned land within the Plan Area

Table 6-4. Land Use Incentives Program (Phase I)	
Land Owner Actions	Eligible Incentive
Dedicate Trail Easement for Proposed Trail Alignment on Adopted PRT Map	Residential Second Unit
Dedicate and/or Construct Public Trailhead Parking Area	
Dedicate Permanent Agricultural, Conservation, or Scenic Viewshed Easement	

This alternative further develops the Land Use Incentives Program to allow additional actions (*in italics*) as shown in the table below (Table 6-5):

Table 6-5. Land Use Incentives Program (Expanded)	
Land Owner Actions	Eligible Incentive
<i>Dedicate Trail Easement for Coastal Trail Primary Route Alignment on Adopted PRT Map¹</i>	Residential Second Unit ¹ (attached or detached) + <i>One (1) attached residential second unit¹</i>
Dedicate Trail Easement for (non-Coastal Trail Primary Route) proposed trail on Adopted PRT Map	Residential Second Unit ⁴
Dedicate and/or Construct Public Trailhead Parking Area	Residential Second Unit ⁴
Dedicate Permanent Agricultural, Conservation, or Scenic Viewshed Easement	Residential Second Unit ⁴
<i>Perform habitat restoration</i>	Residential Second Unit ⁴
<i>Restore, Maintain, and/or Landmark an Historic Structure</i>	Residential Second Unit ⁴

¹For dedication of trail easement(s) for the Coastal Trail primary route alignment, as depicted on the Gaviota Coast Plan PRT-map, landowners would be eligible to apply for the principal Residential Second Unit and a second attached Residential Second Unit.

The residential second unit incentive is described in Action LU-6 (Residential Second Unit Opportunities) and reproduced below:

- An existing, legally permitted guesthouse or agricultural employee dwelling may be converted to an RSU;
- Additional agricultural employee dwelling(s) may be permitted in addition to the converted or new RSU based on demonstrated need;
- Only one RSU or guest house may be permitted per premises;
- RSU conversions and new RSU's may be permitted with a LUP/CDP;
- Detached RSU's shall be clustered with the principal dwelling;
- RSU occupancy should not be restricted;
- Consider the following maximum size of the RSU allowed in the Ag-II zone:
 - Parcel size: 10-40 acres 1,200 sq.ft.
 - Parcel size: 40-100 acres 1,600 sq.ft.
 - Parcel size: > 100 acres 2,000 sq.ft.
- Conversion of a legally permitted agricultural employee dwelling unit to an RSU with a size greater than the maximum allowed RSU size may be permitted if the agricultural employee dwelling was permitted prior to the Board of Supervisors adoption of the Gaviota Coast Plan.

In the case of dedication of trail easement(s) on mapped California Coastal Trail alignments, an additional Residential Second Unit would be possible (in the form of one detached and one attached residential second unit). Although the possible maximum area of detached residential second units is described above, the possible maximum area of attached residential second units is prescribed in the applicable zoning ordinance.

6.2.4.2 Impact Analysis

A summary of the impacts of Alternative 3 in comparison to the proposed Plan is provided in Table 6-1. The impacts analysis of Alternative 3_4 focuses on the environmental issue areas identified in Chapter 4.0 that would be potentially altered by Alternative 3. Several issue areas impact levels would have similar impacts to the proposed Plan and are summarized at the end of the impacts analysis.

Land Use

Buildout of the Plan Area under Alternative 3 would be similar to that of the proposed Plan except that there would be increased potential for additional second dwelling unit production

along proposed trails routes. Overall, the addition of additional second units would be beneficial since they would be seen to support the proposed Plan objective of supporting agricultural land use in the Plan Area.

In the case of easement dedications, Alternative 3 would establish a straight forward process to obtain entitlements for second unit construction and could be ~~expected to be an effective~~ program resulting in achieving the desired additional open space and trails dedications and second unit construction. Habitat restoration, construction of public parking areas, and landmark dedications while also consistent with the proposed Plan goals would entail preparation of restoration and construction plans and require separate permitting and could be a lesser incentive due to costs. The addition of trails land uses would also be seen as beneficial and consistent with the objective of increasing public access and trails in the Plan Area. Therefore, Alternative 3 would be seen to ~~have beneficial impacts~~ be more beneficial to trails and public recreation when compared to the proposed Plan.

As detailed in Chapter 2.0, Project Description, Plan Area buildout is estimated to result in development of 167 additional single-family residences and 9 agricultural employee housing units over the 20-year Plan horizon, the addition of residential second units would be accessory to the primary agricultural use on the AG-II property and would have minimal increased construction and operational impacts, and therefore similar impacts as the proposed Plan related to buildout of the proposed Plan land uses.

Aesthetics/Visual Resources

Under Alternative 3, for any habitat restoration resulting from the homeowner incentive, the proposed Plan would contribute to the natural open space aesthetic and visual character of the Plan Area and would be beneficial. The restoration/maintenance of a historic resource would also contribute to rural heritage and character of the Plan Area and would be beneficial to the aesthetic character of the Plan Area.

~~The addition of r~~Residential second units allowed under the Alternative 3 incentives would be subject to the proposed Plan's site design hierarchy and design guidelines ~~siting guidance, revised Design Review Overlay~~ to address individual visual impacts of individual projects and ~~be subject to the Outdoor Lighting provisions of the LUDC and similar requirements in Article II, Ordinance,~~ and undergo the Design Review process of the Board of Architectural Review, where applicable. Alternative 3 would limit the number of second units, and similar to the proposed Plan, the size of second units that would be allowed under the incentive. ~~The~~ Therefore, Alternative 3 would be limited in scale and have similar aesthetic/visual resources impacts related to construction of residential second units to those expected under the proposed Plan.

Agricultural Resources

Under Alternative 3, the residential second unit incentive would provide additional housing options on agricultural land that could also help reduce operational costs and increase options for multiple generation farm families. Habitat restoration and restoration/maintenance of a historic resource is consistent with maintaining the primary agricultural use of the land and would contribute to the protection and continued suitability and productivity of agricultural lands. Locating trails immediately adjacent to agricultural land has the potential to increase incidents of land use conflicts as hikers, equestrians, or bicyclists could encounter farm equipment or be affected by noise or the application of pesticides and herbicides.

However, the proposed Plan's objectives prioritize both agricultural and recreational parks, recreation, and trails land uses and the proposed Plan includes Trails Siting Guidelines that detail methods to minimize and avoid conflicts and strike a balance between public beach access and trail users and agricultural operators. Alternative 3 incentives would contribute to the overall sustainability of primary agricultural operations, reduce impacts from agricultural conversions to other primary uses by providing housing options, and reduce land use conflicts at the agricultural interface. Therefore, Alternative 3 would have lesser impacts when implemented with the proposed Plan when compared to the proposed Plan alone.

Biological Resources

Habitat restoration proposed in Alternative 3 incentives is consistent with the proposed Plan objectives to protect and enhance interconnected habitat areas and watersheds from the ridgeline to the ocean. Equally, habitat restoration under Alternative 3 would be required to be consistent with County standards for habitat restoration plans and be conducted by qualified biologists approved by the County to ensure potential impacts to special status species or ESH is minimized consistent with the Comprehensive Plan and CLUP. Therefore, Alternative 3 would result in beneficial impacts to biological resources when compared to the proposed Plan.

Cultural and Historic Resources

Alternative 3 contains an incentive to *Restore, Maintain, and/or Landmark a Historic Structure*. This incentive is consistent with the proposed Plan's objective to protect, enhance, and preserve important cultural and historic resources. This incentive may have specific applicability, where the potential exists for preservation of a landmark or historic structure ~~to occur~~ that would not have otherwise occurred, ~~without the incentive exists.~~

Since the Alternative 3 incentive might result in restoration, maintenance, or designation of a historic structure as a historic landmark on private land that otherwise would not have occurred without the incentive, Alternative 3 would reduce potentially significant impacts to historic resources.

Parks, Recreation, and Trails

Locating trails immediately adjacent to agricultural land has the potential to increase incidents of land use conflicts as hikers, equestrians, or bicyclists could encounter farm equipment or might be affected by noise from agricultural operations, or the application of pesticides and herbicides.

The proposed Plan includes Trails Siting Guidelines that detail methods to minimize and avoid conflicts between trail users and agricultural operators. In addition, the incentive to dedicate trails or conservation easements, engages property owners in the long term planning for these facilities, their construction, and maintenance. Therefore, Alternative 3 would have more beneficial impacts when included in the proposed Plan.

Other Environmental Topics Considered

This analysis considered Alternative 3 for its potential to reduce proposed Plan effects to Transportation and Circulation, Air Quality and Greenhouse Gas Emissions; Public Services and Facilities; Noise; Geologic Hazards; Flooding and Water Resources, and Hazardous Materials and Risk of Upset. Under Alternative 3, land use and zoning designations would be the same as with the proposed Plan; thus, potential buildout would be the same. However, Alternative 3's Residential Second Unit (RSU) incentive to encourage certain public benefits, including the dedication of trail easements, especially for the Coastal Trail, agricultural and conservation easements, and protection of historic resources, could result in some additional, albeit limited, residential development in the Plan Area. While limited RSU development could potential create impacts to the issue areas listed above, the public benefits could offset these impacts. The review found that Therefore, implementation of Alternative 3 would have similar impacts to these resources as implementation of the proposed Plan.

6.3 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) requires that an EIR identify which alternative is the environmentally superior alternative. If the No Project Alternative is the environmentally superior alternative, the EIR must also identify which of the other alternatives is the environmentally superior alternative. In the case of the proposed Plan, the No Project Alternative is not the environmentally superior alternative.

This section summarizes the comparative analysis of the extent to which each alternative may avoid or substantially reduce the significant and unavoidable impacts of 20-year buildout of the Plan Area under the proposed Plan. Table 6-1 provides a summary of the comparison of each project alternative when compared with the proposed Plan. The rationale for the identification of the environmentally superior alternative is also provided in this section.

Alternative 2 is identified as the environmentally superior alternative. This because Alternative 2 explores the likelihood of significant and unmitigable impacts associated with the proposed Plan on visual resources, biological resources, and parks, recreation and trails, and prioritizes

conservation of the area's resources and character when considering future development proposals. While similar to the proposed Plan in many ways, Alternative 2 includes different policy approaches that are capable of a higher level of conservation combined with better access to the coast. Alternative 2 would maximize the protection of natural, agricultural, and recreational resources through the acquisition of public bluff-top open space, expand coastal access through the acquisition of easements for the California Coastal Trail, and would plan for the expansion of visitor serving land uses, such as campgrounds. Alternative 2 would also identify properties for public acquisition for recreation and protection of habitats, view corridors, and open space. While already a goal of the proposed Plan, Alternative 2 would further protect habitat and trail connectivity, where appropriate, between the coastal areas and Los Padres National Forest. Finally, Alternative 2 would require that all new structures and improvements in the Plan Area avoid prime soils and be integrated with the surrounding environment to the greatest possible extent to maintain the character of the community.

In summary, Alternative 2 provides different policy approaches to the community vision of the proposed Plan to preserve the rural character of the Gaviota Coast by protecting and enhancing its varied and unique natural and cultural resources, agricultural productivity, and by enhancing public recreation and access consistent with the capacity of its resources and is therefore the environmentally superior alternative.