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

Date: July 13, 2009

To: Planning Commission

From: Derek Johnson, Director

CC: Dianne Black, Interim Director, Planning & Development

Subject: Santa Ynez Valley Community Plan EIR Revision Letter #1 Corrections

Table D on page 13 of Revision Letter #1 included as Attachment C to the July 15th Planning Commission staff report has been revised to correct data errors. Table D compares trip generation rates under the Downzone Alternative without AHOD sites to the Initiated SYVCP Project Description. Table D has been amended to include the correct Average Daily Trips, A.M. Peak Hour and P.M. Peak Hour trips that would result from the Initiated SYVCP Project Description and the Downzone Alternative without AHOD sites. The appropriate associated data corrections have also been made to the text within Section III.B. (2), Traffic, Air Quality, and Noise. The corrections conclude there would be a larger reduction in trips under the Downzone Alternative without AHOD sites when compared to the previous version of Revision Letter #1.

In addition, a minor revision has been made to Section III.C. (2) which reflects necessary EIR changes resulting from Planning Commission directed revisions. The original Revision Letter #1 text incorrectly reflected necessary revisions to EIR Figure 4.2-1 to include a 1998 version of the PRT-4 map. The text has been amended to reflect the correct version of the map, which was last amended in 1988.

Minor corrections to Revision Letter #1 do not change the conclusions or result in a change in the levels of impact identified in the existing analysis included in the EIR. Therefore, the analysis incorporated into the EIR corrected Revision Letter #1 may be used to fulfill environmental review requirements for the SYVCP and does not require recirculation pursuant to CEQA Guidelines Section 15088.5.

Enclosed:

Corrected Revision Letter #1

AG-II zoning districts[4]. For the permit downshifting presented by the downzoning of properties from AG-I to AG-II as well as for the Proposed Agricultural Permitting Ordinance Amendments, these would involve changes in process for considering certain new agriculturally-related uses, rather than change the type or intensity of the uses allowed. It should also be noted that the Proposed Agricultural Permitting Ordinance Amendments are subject to separate environmental review, such that any environmental effects of this separate program are being evaluated pursuant to CEQA.

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

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

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

This correction results in a higher number of ADTs and PHTs for the Initiation Draft SYVCP project. Accordingly, the Downzone Alternative would result in additional incremental reductions of traffic congestion, air contaminant emissions, and vehicle noise impacts. Compared to the proposed Initiation Draft SYVCP, the Downzone Alternative would result in 841 fewer ADTs and 78 fewer PM PHTs. This is a correction from the 191 fewer ADTs and 20 fewer PM PHTs that was reported in Section 6, *Alternatives*, of the EIR. The 841 fewer ADTs represent a reduction of about 3.2% fewer ADTs as

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

apply to the Downzone without AHOD Alternative for all impacts that would remain Class II or Class I.

2. Traffic, Air Quality, and Noise

As discussed above and shown below in Table D, fewer vehicle trips would be expected in the Downzone without AHOD Alternative due to the reduced level of residential development. The Downzone without AHOD Alternative would generate 1,515 fewer ADTs than the Initiated Draft SYVCP, which represents a reduction of about 5.8% fewer ADTs as compared to the 26,059 ADTs generated by the Initiation Draft SYVCP. Thus, traffic levels would be incrementally lower under this Alternative. With the elimination of potential high- and medium-density development on the AHOD sites, there would be less potential traffic generated at the intersections closest to these sites, including the intersections of SR 246/Quail Valley-Marcelino, SR 246/Sienna Way, and SR 246/Refugio Road over the 20-year planning horizon. As with the Initiation Draft SYVCP, impacts to the Los Olivos, Ballard, and Santa Ynez roadway systems, weekend traffic impacts, and impacts associated with buildout of AHOD sites A-D would remain less than significant. In addition, although impacts to the backbone roadway systems would be incrementally lower than under the Initiation Draft SYVCP, all of the significant impacts to the SR 154 and SR 246 corridors that were identified for the proposed project would still occur under the Downzone without AHOD Alternative. All of the mitigation measures recommended for the Initiation Draft SYVCP would apply and, as with the proposed project, implementation of recommended mitigation measures would reduce backbone system impacts to a less than significant level. These impacts would therefore be similar to those of the No Project Alternative, but would remain Class II, *significant but mitigable*.

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Table D. Trip Generation Comparison – Downzone without AHOD Alternative

Scenario	Size	ADT	AM PHT	PM PHT
Downzone w/o AHOD Alternative				
Primary Residential Units	+ 496 units	4,747	372	501
Secondary Residential Units	+ 194 units	1,137	85	101
AHOD Sites	0 units	0	0	0
Commercial Uses	+ 555,334 SF	18,660	804	1,288
Total		**24,544**	**1,261**	**1,890**
SYVCP				
Primary Residential Units	+ 516 units	4,938	387	521
Secondary Residential Units	+ 305 units	1,787	134	159
AHOD Sites	+ 115 units	674	51	60
Commercial Uses	+ 555,334 SF	18,660	804	1,288
Total		**26,059**	**1,376**	**2,028**
Net Reduction in Downzone without AHOD Alternative		**-1,151**	**-115**	**-138**

Based on 20-Year Buildout conditions

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Air pollutant emissions, including GHG emissions, associated with the Downzone without AHOD Alternative would be reduced commensurately with the reduction in vehicular traffic. The 26% reduction in new residences (from 936 to 690 new residences) under 20-year buildout conditions, and the resultant 5.8% reduction in traffic volumes (ADTs), would result in an approximately 5.8% reduction in GHG emissions. This represents a decrease of approximately 4,509 metric tons per year in carbon dioxide equivalency units under 20-year buildout conditions. The Downzone without AHOD Alternative would also include the energy efficiency and GHG emission reduction policies, development standards, and mitigation measures geared towards compliance with AB 32 and SB 375 that are in the proposed SYVCP. Therefore, this alternative would provide similar mechanisms to reduce GHG emissions and impacts on global climate change. Overall, given that mobile source emissions comprise the majority (88%) of GHG emissions, the reduction in ADTs in the Downzone without AHOD Alternative would result in decreased GHG emissions and global climate change impacts in comparison with the Initiation Draft SYVCP.

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

With respect to CAP consistency, the 26% reduction in new residences would address the inconsistency with CAP population forecasts identified for the proposed project. Impact AQ-1, the significant and unavoidable (Class I) Air Quality impact related to CAP Consistency, would be eliminated, as the reduction in residential growth in this alternative would result in a population increase that is less than the 1,988 person increase projected for the 20-year buildout under the existing Comprehensive Plan. The Downzone without AHOD Alternative has a 20-year population growth forecast of 1,945 residents, which is within existing forecasts. Hence, there would be no impact with respect to consistency of this alternative with the CAP, and impacts would be less than significant without mitigation. Retention of Mitigation Measure AQ-1.1, however, is recommended as a greenhouse gas reduction measure.

It should be noted that the AHOD sites were selected along a transit corridor in part to reduce per unit trip generation rates and reduce ADTs and vehicle miles traveled (VMT) because of the sites' proximity to transit services and other alternative transportation modes. However, the elimination of the opportunity for development of the AHOD sites for medium- and high-density development is not expected to result in an associated increase in numbers of new residential units (primary and more affordable secondary units) elsewhere in the Plan Area. The projected 20-year residential buildout of the Plan Area is based on historical residential housing projection rates and did not assume that a certain portion of the 20-year buildout would be accommodated by the development of AHOD sites. The EIR evaluated the full 115-unit buildout of these sites as a reasonable

worst case development scenario, while recognizing that all four sites may not seek the application of the AHOD overlay. Hence the elimination of the AHOD sites for up to 115 medium- to high-density housing units does not result in the need to accommodate these 115 units elsewhere in the Plan Area. On the other hand, the reduction in primary and secondary residential development projected to result from the downzoning component of this alternative would be expected to lead to a reduction in the 20-year residential buildout (as reported in Table B), since the rate of housing production would be expected to decrease in proportion to the decrease in residential potential of the downzoned parcels.

The 14% reduction in new residences under the Downzone without AHOD Alternative and associated 5.8% reduction in overall traffic generation would incrementally reduce potential exposure to excessive noise as well as the increase in temporary construction noise and long-term traffic noise. While the removal of the AHOD would avoid the AHOD development-specific Class II noise exposure impacts, additional residences in areas subject to higher noise levels would still potentially be exposed to noise exceeding County standards. In addition, traffic noise increases would remain significant along portions of SR 154 and SR 246 as the reduction in noise level change would be less than 0.1 dB as compared to what would occur under the proposed project. Therefore, all of the segments that would experience an increase of greater than 1.5 dB would also experience an increase of greater than 1.5 dB under this alternative. Similar to the proposed project, construction-related noise impacts would be less than significant (Class III). Mitigation measures recommended for the proposed project to address exposure to excessive noise would apply and would reduce impacts to a less than significant level. These measures would also address impacts relating to traffic noise increases to the degree feasible. However, as with the proposed project, the increase in traffic noise along SR 154 and SR 246 would remain significant and unavoidable (Class I) and would be similar to the No Project Alternative.

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3. Water, Wastewater, and Solid Waste

Overall, this alternative would generate slightly less solid waste, water demand, and wastewater than the proposed project, given the slightly lower residential buildout amounts. Tables E through G show estimated solid waste generation, water demand, and wastewater generation at buildout of the Downzone without AHOD Alternative. Solid waste generation would be about 322 tons/year (19%) lower under this alternative than under the proposed project. With the elimination of the AHOD medium- and high-density housing, overall Plan Area water demand would be reduced by 12.1 acre-feet per year (AFY) (refer to Table 4.9-15), in addition to the reduction of 35 AFY calculated for the downzoning component of this alternative. Overall, as compared to the Initiation Draft SYVCP, Plan Area water demand would be reduced by approximately 47 AFY (0.67%).

III.C. Planning Commission Directed Revisions

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

1. Revisions to the Mixed-Use Overlay

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

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

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

Section 4.2 of the EIR would be changed as follows:

- Revise Figure 4.2-1 to include the 1988 version of the PRT-4 map. The revised Figure 4.2-1 is included as an attachment to this revision letter.

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

  The Comprehensive Plan provides a Parks, Recreation, and Trails Map (PRT-4) that was last revised in 1988. Comprehensive Plan policy PRT-4 identified both existing and proposed trail corridors throughout the Santa Ynez Valley. Figure 4.2-1 illustrates the