Appendix J

Policy Consistency

Appendix J – Policy Consistency

This section provides a preliminary analysis of the project's consistency with policies and standards in the Santa Barbara County Comprehensive Plan that are applicable to the various components of the project. Although policy consistency determinations would not result in direct impacts to the physical environment beyond the potential impacts identified and addressed in other sections of this EIR, the policy consistency discussion is provided for informational purposes.

With respect to each of the identified policies and standards, the project is described as "consistent" (the project could directly implement the policy or would not hinder implementation of the policy) or "inconsistent" (the project may hinder implementation or directly conflicts with of the policy). It should be noted that the discussion below is intended to guide policy interpretation but is not intended to replace the County decision-making process. A final determination of the project's consistency with applicable County policies and standards will be made by County decision-makers when they act on the project.

Refer also to Section 4.3, *Air Quality*, for an analysis of the project's consistency with the Santa Barbara County Air Pollution Control District's (SBCAPCD's) 2019 Ozone Plan, and Section 4.8, *Greenhouse Gas Emissions*, for a discussion of the proposed project's consistency with the applicable goals and objectives to reduce greenhouse gas (GHG) emissions from the Santa Barbara County Association of Government's 2040 Regional Transportation Plan and Sustainable Communities Strategy and the project's consistency with the energy efficiency, water conservation and efficiency, and transportation and motor vehicle measures in the California Air Resources Board's (CARB's) 2017 Scoping Plan.

Santa Barbara County Comprehensive Plan

The County's Comprehensive Plan is a long-range plan that serves as a guide for the physical development of unincorporated Santa Barbara County. The Comprehensive Plan is comprised of several topical parts or elements, including a Coastal Land Use Plan, Agricultural, Circulation, Conservation, Energy, Environmental Resources Management, Hazardous Waste, Housing, Land Use, Noise, Open Space, Seismic Safety and Safety, and Scenic Highways elements.

The Comprehensive Plan includes policies and standards that provide a general framework for County-wide development. Table 1 discusses the proposed project's consistency with relevant Comprehensive Plan policies and standards.

Table 1 Santa Barbara County Comprehensive Plan Policy Consistency

Policies and Standards	Consistency Discussion
Agricultural Element Policies	
Policy 1A. The integrity of agricultural operations shall not be violated by recreational or other non-compatible uses. Imposition of any condition requiring an offer of dedication of a recreational trail or other recreational easement shall be discretionary (determined on a case-by-case basis), and in exercising its discretion, the County shall consider the impact of such an easement upon agricultural production of all lands affected by and adjacent to said trail or other easement.	**Consistent.** No recreational or other non-compatible uses are proposed as a part of the project. The project proposes improvements intended to support existing agricultural activity in the vicinity. The proposed project is a permitted use in the AG-II-zone district and is considered a support facility that would allow area farmers to process their product locally.
Policy 1B. The County shall recognize the rights of operation, freedom of choice as to the methods of cultivation, choice of crops or types of livestock, rotation of crops and all other functions within the traditional scope of agricultural management decisions. These rights and freedoms shall be conducted in a manner which is consistent with: (1) sound agricultural practices that promote the long-term viability of agriculture and (2) applicable resource protection policies and regulations.	**Consistent.** The project objectives include development of the project site with a use that preserves the agricultural heritage and productivity of the property consistent with the policies of the County of Santa Barbara Agricultural Element. Furthermore, the project aims to assist area agricultural producers in expanding agricultural production by providing support infrastructure that maximizes of capacity of existing acreage under production and assists area growers with accessing additional and diverse markets. A processor/freezer facility will provide area farmers with a wider range of crops types that can be grown. The project would improve flexibility in the harvest/processing stage of agricultural production.
Policy 1C. To increase agricultural productivity, the County shall encourage land improvement programs.	**Consistent.** As discussed in Section 2, *Project Description*, one of the project objectives is to assist area agricultural producers in expanding agricultural production by providing support infrastructure that maximizes of capacity of existing acreage under production
Policy 1D. The use of the Williamson Act (Agricultural Preserve Program) shall be strongly encouraged and supported. The County shall also explore and support other agricultural land protection programs.	**Consistent.** The project site and adjacent properties are not listed under the Williamson Act.
Policy 1E. The County shall recognize that the generation of noise, smoke, odor, and dust is a natural consequence of the normal agricultural practices provided that agriculturalists exercise reasonable measures to minimize such effects.	**Consistent.** As described in Section 4.13, *Noise,* project construction and operation would not exceed County noise standards at the closest sensitive receptors (single-family residences to the southeast and single-family residence to the northwest of the project site). As discussed in Section 4.3, *Air Quality*, the project construction contractor would be required to implement standard dust control and equipment exhaust measures to reduce air quality emissions during construction. In addition, idling of trucks would be limited to less than 5 minutes by CARB's In-Use Off-Road Diesel Vehicles regulation. Mitigation Measure AQ-1 would reduce the project's impacts to air quality by providing infrastructure necessary to support zero-emission vehicles and equipment and providing solar panels. With implementation of Mitigation Measure AQ-1, the project

	would still result in significant and unavoidable NO emissions. However, because the project would implement reasonable measures to minimize air quality emissions during operation, the project is consistent with this policy. Furthermore, the proposed project would generate localized emissions of diesel exhaust during construction equipment operation and truck activity. Odor from these emissions may be noticeable from time to time near the project site. However, diesel emission odors would be localized and, due to the distance to the nearest sensitive receptors, would not adversely affect people off-site. Therefore, the project would not include any sources of odors that would be expected to result in complaints from surrounding uses or otherwise adversely affect a substantial number of people.
Policy 1F. The quality and availability of water, air, and soil resources shall be protected through provisions including but not limited to, the stability of Urban/Rural Boundary Lines, maintenance of buffer areas around agricultural areas, and the promotion of conservation practices.	**Consistent.** As discussed in Section 4.10, *Hydrology and Water Quality,* Section 4.3, *Air Quality*, and Section 4.7, *Geology and Soils,* the quality and availability of water, air, and soil resources would be protected through compliance with regulations set by the County of Santa Barbara and State. The project's use of groundwater would be comparable to the historical water use on the property for farming and would have little to no impact to groundwater levels in the overall Santa Maria Groundwater Basin and would not contribute to a significant decline in groundwater supply. As discussed in Section 4.3, Air Quality, the project contractor would implement standard dust control and equipment exhaust to reduce air quality emissions during construction. Idling of trucks would be limited to less than 5 minutes by CARB's In-Use Off-Road Diesel Vehicles regulation. Mitigation Measure AQ-1 would reduce the project's impacts to air quality by providing infrastructure necessary to support zero-emission vehicles and equipment and providing solar panels. With implementation of Mitigation Measure AQ-1, the project would still result in significant and unavoidable NO_X emissions. However, the project would implement all reasonable measures to minimize air quality emissions during operation. As discussed in Section 4.7, *Geology and Soils*, compliance with the County Code and NPDES permit and regulations, along with the project's proposed stormwater retention infrastructure, the project would not substantially contribute to erosion or the loss of topsoil.
Policy 1G. Sustainable agricultural practices on agriculturally designated land should be encouraged in order to preserve the long-term health and viability of the soil.	**Consistent.** The project would utilize approximately 40 acres of a portion of a larger 109-acre site with a use necessary to support existing regional agricultural operations. The remaining acreage would continue to be a viable agricultural site for production. The proposed facility would help ensure continued agricultural production in the area by providing support facilities for crop processing. As discussed in Section 4.2, *Agricultural Resources*, the

	potential conversion of grazing land or crop land to higher yield crops would not impair agricultural land productivity and may actually increase productivity. Furthermore, as discussed in Section 4.7, *Geology and Soils*, compliance with the County Code and NPDES permit and regulations, along with the project's proposed stormwater retention infrastructure, the project would not substantially contribute to erosion or the loss of topsoil. Therefore, the project would maintain sustainable agricultural practices in order to preserve the health and viability of the soil.
Policy 2A. Santa Barbara County shall require measures designed for the prevention of flooding and silting from urbanization, especially as such damage relates to approved development.	**Consistent.** As discussed in Section 4.10, *Hydrology and Water Quality*, the project would be required to comply with the requirements of the Phase II MS4 Permit (and associated County guidance documents) and the Santa Barbara County Flood Control District (SBCFCD) which regulate stormwater discharge from the project site. The project includes an on-site retention/infiltration basin to reduce peak flows from the project site in compliance with the Phase II MS4 and SBCFCD requirements. The Stormwater Control Plan prepared for the project describe the stormwater facility maintenance procedures to ensure that the proposed retention/infiltration facilities maintain the required reduced flow rates and minimize discharge of stormwater contaminants into off-site drainages.
Policy 2C. Santa Barbara County shall discourage the extension by the Local Agency Formation Commission (LAFCO) of urban spheres of influence into productive agricultural lands designated Agriculture II(A-II) or Commercial Agriculture (AC) under the Comprehensive Plan.	**Consistent.** The project site is currently zoned AG-II with a corresponding zoning map symbol of AG-II-40. The project does not require the existing zoning be changed. The project objectives include preservation of the agricultural heritage and productivity of the property. Furthermore, the project aims to assist area agricultural producers in expanding agricultural production by providing support infrastructure that maximizes of capacity of existing acreage under production and assist area growers in accessing additional and diverse markets. As such the project would not encourage encroachment of urban development into productive agricultural land.
Policy 2D. Conversion of highly productive agricultural lands whether urban or rural shall be discouraged. The County shall support programs which encourage the retention of highly productive agricultural lands.	**Consistent.** The proposed project would develop an agricultural processor and freezer facility on prime and non-prime agricultural lands used for a mix of row crops, livestock, and grazing. However, the project would support the current land designation of AG-II by developing an agricultural processor and freezer facility on the project site to increase agricultural productivity. As discussed in Section 2, *Project Description*, the project aims to develop the site with a use that preserves the agricultural heritage and productivity of the property. Furthermore, the project would assist area agricultural producers in expanding agricultural production by providing support infrastructure that maximizes of capacity of existing acreage currently under production and assist area growers in accessing additional and diverse markets.

Policy 3A. Expansion of urban development into active agricultural areas outside of urban limits is to be discouraged, as long as infill development is available.	**Consistent.** The project would support agriculture in the area and would not promote urban growth. As discussed in Section 2, *Project Description*, the primary objectives of the project are to preserve the agricultural heritage and productivity of the property consistent with the goals of the County of Santa Barbara Agricultural Element; assist area agricultural producers in expanding agricultural production by providing support infrastructure that maximizes of capacity of existing acreage under production; provide infrastructure that assists area growers to access additional and diverse markets through the region, nation, and internationally; and provide increased occupational opportunities in the agricultural community. As discussed in Section 5, *Other CEQA Required Discussions,* the project would support the continued agricultural uses in the surrounding area and would not encourage the development of the surrounding agricultural land to other urban uses. Additionally, the project would expand infrastructure or result in the removal of any obstacles to growth that would prompt urban growth in the area.
Policy 5A. Santa Barbara County shall permit on-farm supportive installations for product handling and selling as prescribed in the Uniform Rules of the County's Agricultural Preserve Program.	**Consistent.** As discussed in Section 4.2, *Agricultural Resources,* the proposed project is intended to support agriculture by providing a processing, storage and distribution center. Therefore, the project would permit on-farm supportive installations for product handling and selling, consistent with this policy.
Policy 5B. Santa Barbara County should allow areas for supportive agricultural services within reasonable distance and access to the farm user.	**Consistent.** As discussed in Section 2, *Project Description*, the project objectives include providing a supportive agricultural use in proximity to existing agricultural crop growing. The proposed facility would provide processing services in close proximity to area farms on a designated truck route with nearby highway access. This would allow for raw product to be processed more quickly following harvesting.
Policy 6A. To the maximum extent feasible, the County Public Works Department shall design roads with the type and size of vehicles and/or equipment in mind which are used in the agricultural operations of the area.	**Consistent.** As discussed in Section 4.13, *Transportation and Circulation,* access to and from the project site would be provided via East Betteravia Road. The proposed operations would involve the use of various types of field trucks, semi-trucks, and large vans. The proposed frontage improvements on Betteravia Road include the addition of two driveways to access the project site and the widening of the road to provide a separate right turn lane to accommodate traffic accessing the project site. Additionally, all project site design features, including but not limited to roadway designs and driveway access to adjacent streets, would be subject to review and approval by the County at the time improvement plans are submitted. Established County review processes ensure that project driveway access control and sight distance standards conform to County design and safety standards.

Circulation Element Standards

Roadway Standards:

a. A project that would contribute ADTs to a roadway where the Estimated Future Volume does not exceed the policy capacity would be considered consistent with this section of this Element.

b. For roadways where the Estimated Future Volume exceeds the policy capacity but does not exceed the Acceptable Capacity, a project would be considered consistent with this section of this Element only if the number of ADTs contributed by the project to the roadway was less than or equal to 2 percent of the remaining capacity of that roadway or 40 ADT, whichever is greater.

c. For roadways where the Estimated Future Volume exceeds the acceptable capacity but does not exceed Design Capacity, a project would be considered consistent with this section of this Element only if the number of ADTs contributed by the project to the roadway does not exceed 25 ADT.

d. For roadways where the Estimated Future Volume exceeds the design capacity, a project would be consistent with this section of this Element only if the number of ADTs contributed by the project to the roadway does not exceed 10 ADT.

Intersection Standards:

1. Projects contributing PHTs (peak hour trips) to intersections that operate at an Estimated Future Level of Service that is better than LOS C shall be found consistent with this section of this Element unless the project results in a change in V/C (volume/capacity) ratio greater than 0.20 for an intersection operating at LOS A or 0.15 for an intersection operating at LOS B.

2. For intersections operating at an Estimated Future Level of Service that is less than or equal to LOS "C," a project must meet the following criteria in order to be found consistent with this section of this Element.

For intersections operating at an Estimated Future Level of Service C, no project must result in a change of V/C ratio greater than 0.10.

For intersections operating at an estimated future Level of Service D, no project shall contribute 15 or more Peak Hour Trips.

For intersections operating at an Estimated Future level of Service E, no project shall contribute 10 or more Peak Hour Trips.

For intersections operating at an Estimated Future Level of Service F, no project shall contribute 5 or more Peak Hour Trips.

Consistent. The CEQA Guidelines and SB 743 changed the criteria for determining what constitutes a significant transportation-related environmental impact to rely upon quantification of vehicle miles travelled (VMT) instead of level of service (LOS). As discussed in Section 4.13, *Transportation and Circulation*, the project would not exceed VMT significance thresholds and transportation impacts would be less than significant pursuant to CEQA.

The County still considers average daily trips (ADT), LOS, or similar metrics as part of development review, community plans, or transportation plans outside of the CEQA process. New projects must still comply with these policies and standards and provide roadway improvements as part of the project design when necessary to accommodate project-generated traffic and maintain acceptable roadway operating conditions. However, exceeding ADT or LOS standards are no longer considered a CEQA impact pursuant to the CEQA Guidelines and SB 743. In compliance with this requirement, a *Revised Traffic and Circulation Stud*y (Associated Transportation Engineers; July 2020) was prepared for the project as part of the development review process.

As detailed in the *Revised Traffic and Circulation Stud*y, the project would generate 454 ADT (32 AM peak hour trips and 81 PM peak hour trips) during non-harvest season and 1,642 ADT (67 AM peak hour trips and 341 PM peak hour trips) during harvest season. However, the additional trips would not cause study area roadways to exceed County of Santa Barbara or City of Santa Maria volume/capacity (V/C) or LOS standards for the existing plus project and cumulative plus project condition. Additionally, the project would be required to pay transportation impact mitigation fees based on the number of PM peak hour trips generation. These fees are used by the County to implement transportation improvements to accommodate future development. The project design also includes frontage improvements on Betteravia Road, including the addition of two driveways to access the project site and the widening of the road to provide a separate right turn lane to accommodate traffic accessing the project site. Because the project ADT would not cause study area roadways to exceed V/C LOS standards, the project would be consistent with this policy.

3. Where a project's traffic contribution does not result in a measurable change in the V/C ratio at an intersection but does result in a finding of inconsistency with Intersection Standard 2 above, intersection improvements that are acceptable to the Public Works Department shall be required in order to make a finding of consistency with these intersection standards. A measurable change in V/C ratio shall be defined as a change greater than or equal to 0.01. *(amended by 93-GP-12)*	
3. Where a project's traffic contribution does not result in a measurable change in the V/C ratio at an intersection but does result in a finding of inconsistency with Intersection Standard 2 above, intersection improvements that are acceptable to the Public Works Department shall be required in order to make a finding of consistency with these intersection standards. A measurable change in V/C ratio shall be defined as a change greater than or equal to 0.01. *(amended by 93-GP-12)*	
4. Where a project's traffic contribution does result in a measurable change in V/C ratio and also results in a finding of inconsistency with Intersection Standards 1 or 2, above, intersection improvements that are sufficient to fully offset the change in V/C ratio associated with the project shall be required in order to make a finding of consistency with these intersection standards. *(amended by 93-GP-12)*	
5. The above intersection standards shall also apply to all projects which generate Peak Hour Trips to intersections within incorporated cities that are operating at levels of service worse than those permitted by the City's Circulation Element	
Policy A. The roadway classifications, intersection levels of service, and capacity levels adopted in this Element shall apply to all roadways and intersections within the unincorporated area of the County, with the exception of those roadways and intersections located within an area included in an adopted community or area plan. Roadway classifications, intersection levels of service, and capacity levels adopted as part of any community or area plan subsequent to the adoption of this Element shall supersede any standards included as part of this Element.	**Consistent.** As discussed above regarding consistency with the Circulation Element Roadway and Circulation Standards , as part of the development review process, and separate from the CEQA process, a *Revised Traffic and Circulation Study* was prepared to evaluate changes to roadway and intersection levels of service and capacity levels resulting from the addition of project trips to the roadway network. The County V/C and LOS standards and thresholds were accounted for in this analysis.
Policy E. A determination of project consistency with the standards and policies of this Element shall constitute a determination of project consistency with the Land Use Element's Land Use Development Policy #4 with regard to roadway and intersection capacity.	**Consistent.** As discussed above, as part of the development review process, and separate from the CEQA process, a *Revised Traffic and Circulation Study* was prepared to evaluate changes to roadway and intersection levels of service and capacity levels resulting from the addition of project trips to the roadway network. The County V/C and LOS standards and thresholds were utilized in the analysis.
Conservation Element Policies – Water Resources	
Policy 1. The County and the cities should support the Regional Water Quality Control Board in its establishment	**Consistent.** The project would comply with all State Water Resources Control Board and Regional Water Quality

of discharge requirements for point source waste discharges, in order to protect surface and groundwater supplies	Control Board requirements for point source stormwater discharges. As discussed in Section 4.10, *Hydrology and Water Quality*, project construction would comply with the requirements of the SWRCB's Construction General Permit. In compliance with these requirements, a SWPPP would be prepared and construction BMPs implemented to control the discharge of pollutants off-site. Construction BMPs would include, but not be limited to, Erosion Control and Sediment Control BMPs designed to minimize erosion and retain sediment on site, and Good Housekeeping BMPs to prevent spills, leaks, and discharge of construction debris and waste into receiving waters. Project operation would comply with the requirements of the SWRCB Phase II MS4 Permit and associated County guidance documents. Operational BMPs, including Source Control and LID BMPs, would be implemented and maintained. Proposed Source Control BMPs include storm drain inlet signage; education of owners, lessees, and operators; preservation of existing trees, shrubs, and groundcover; design of landscaping to minimize irrigation and runoff and promote infiltration; minimizing use of pesticide and fertilizers; use of pest-resident landscaping; sweeping of plazas, sidewalks, and parking lots; collection of debris from pressure washing; and collection of wash water containing cleaning agents or degreasers. LID BMPs include a retention/infiltration basin. The proposed BMPs would target and reduce discharge of stormwater runoff and pollutants of concern from the project site.
Policy 4. The County should initiate a study of land development in areas relying on septic tanks to assess the impact of alternative densities on water quality.	**Consistent.** The project includes an on-site wastewater a basin for disposal of process wastewater and septic leach fields for disposal of domestic wastewater (from on-site uses such as sinks and toilets). All wastewater generated from the processor would be treated in accordance with State of California water quality standards prior to discharge to the wastewater basin. In addition, the project would obtain a waste discharge requirements permit from the Regional Water Quality Control Board for the proposed on-site wastewater systems (i.e. the wastewater basin and leach field). The project would comply with all requirements, including water quality standards, specified in the permit.
Energy Element Policies	
Policy 1. Provide for cost-effective and efficient use of energy in the facilities and operations owned by the County of Santa Barbara to reduce operating costs, mitigate adverse environmental impacts and set a good example in the community.	**Consistent.** As discussed in Section 4.6, *Energy,* the project would comply with all building design standards set in California Building Code (CBC) Title 24 and County Energy and Climate Action Plan (ECAP), which require implementation of energy efficient light fixtures and building materials into the design of new construction projects. Furthermore, the 2019 Building Energy Efficiency Standards (CBC Title 24, Part 6) requires newly constructed buildings to meet energy performance standards set by the California Energy Commission (CEC).

	As the name implies, these standards are specifically crafted for new buildings to result in energy efficient performance so that the buildings do not result in wasteful, inefficient, or unnecessary use of energy.
Land Use Element – Land Use Development Policies	
Policy 4. Prior to issuance of a development permit, the County shall make the finding, based on information provided by environmental documents, staff analysis, and the applicant, that adequate public or private services and resources (i.e., water, sewer, roads, etc.) are available to serve the proposed development. The applicant shall assume full responsibility for costs incurred in service extensions or improvements that are required as a result of the proposed project. Lack of available public or private services or resources shall be grounds for denial of the project or reduction in the density otherwise indicated in the land use plan.	**Consistent.** As discussed in Section 4.14, *Utilities and Service Systems*, the project groundwater use would be comparable to the historical water use on the property for farming. Specifically, an approximately 15 AFY decrease in on-site groundwater demand from existing conditions would occur as a result of the project. As such, there are adequate water supplies in the local groundwater aquifer to serve the proposed project. As described in Section 4.6, *Energy*, Pacific Gas & Electric Company (PG&E) would have sufficient supplies for the project and would not place a significant demand on the electrical supply. In addition, the Southern California Gas Company (SCG) would have sufficient natural gas supplies to serve the project. As described in Section 4.15 *Effects Found Not to be Significant*, and Section 2.5.10, *Wastewater*, the project would not require a connection to off-site wastewater conveyance or treatment facilities as wastewater would be treated and disposed of on site. As discussed in Section 2, *Project Description*, public roadways are available to serve the proposed project, consistent with this policy. The project design includes the necessary frontage improvements on Betteravia Road, including the addition of two driveways to access the project site and the widening of the road to provide a separate right turn lane to accommodate traffic accessing the project site.
Land Use Element – Hillside and Watershed Protection Policies	
Policy 1. Plans for development shall minimize cut and fill operations. Plans requiring excessive cutting and filling may be denied if it is determined that the development could be carried out with less alteration of the natural terrain.	**Consistent.** As discussed in Section 2, *Project Description*, the project would involve grading operations that would result in approximately 64,876 cubic yards (cy) of soil cut and 50,311 cy of soil fill, balancing out to approximately 14,565 cy net soil cut. Due to the generally flat topography of the project site (average slope of less than two percent) cut and fill would be minimized to the extent feasible and would not substantially alter the existing terrain. However, a maximum two-foot fill slope is needed to construct the proposed storm water and process water retention infrastructure.
Policy 2. All development shall be designed to fit the site topography, soils, geology, hydrology, and any other existing conditions and be oriented so that grading and other site preparation is kept to an absolute minimum. Natural features, landforms, and native vegetation, such as trees, shall be preserved to the maximum extent feasible. Areas of the site which are not suited to	**Consistent.** Due to the generally flat topography of the project site (average slope of less than two percent) grading would be minimized to the extent feasible and would not substantially alter the existing terrain. However, a maximum two-foot fill slope is needed to construct the proposed storm water and process water retention infrastructure.

development because of known soil, geologic, flood, erosion or other hazards shall remain in open space.	Project grading activities would be subject to the County's grading ordinance, which requires a grading permit and an Erosion and Sediment Control Plan. The project would be subject to Section 14-29 of the Santa Barbara County Code, which requires preparation and execution of an erosion and sediment control plan as part of grading plan requirements. The project design would comply with the most recent CBC requirements and Santa Barbara County's Uniform Building Code to ensure that the new structures are engineered to withstand the expected ground acceleration to minimize the risk to life and property from seismic hazards. Risk from other geologic hazards are low. The project would add approximately 19.7 acres of impervious surfaces in the form of paving and structural development to the project site. However, the project includes low impact development (LID) best management practices (BMPs) (e.g., proposed retention/infiltration basin) which would mimic project site's natural hydrology by using design measures that capture, filter, store, evaporate, detain, and infiltrate runoff rather than allowing runoff to flow directly to piped or impervious storm drains. Proposed Source Control BMPs preservation of existing trees, shrubs, and groundcover. Additionally, impacts to the existing irrigation ditch (which contains a streambed and banks with wetland plants that could support wildlife) would be limited three crossing needed to provide site access and utility connections.
Policy 3. For necessary grading operations on hillsides, the smallest practical area of land shall be exposed at any one-time during development, and the length of exposure shall be kept to the shortest practicable amount of time. The clearing of land should be avoided during the winter rainy season and all measures for removing sediments and stabilizing slopes should be in place before the beginning of the rainy season.	**Consistent.** Due to the generally flat topography of the project site (average slope of less than two percent) grading would be minimized to the extent feasible and would not substantially alter the existing terrain. However, a maximum two-foot fill slope is needed to construct the proposed storm water and process water retention infrastructure. Project development would require preparation of a Storm Water Pollution Prevention Plan (SWPPP) that would include the implementation of sediment basins and other sediment control methods in the initial stage of construction in order to control sediment runoff; stabilization of exposed soils within one week of exposure; BMP inspections prior to rain events; avoiding construction during rain events; stabilizing slopes; and controlling erosion.
Policy 4. Sediment basins (including debris basins, desilting basins, or silt traps) shall be installed on the project site in conjunction with the initial grading operations and maintained through the development process to remove sediment from runoff waters. All sediment shall be retained on-site unless removed to an appropriate dumping location.	**Consistent**. As discussed in Section 4.10, *Hydrology and Water Quality,* project construction would be required to comply with the requirements of the State Water Resources Control Board's (SWRCB's) Construction General Permit and County's grading code. In compliance with these requirements, a SWPPP would be prepared and construction BMPs implemented to control the discharge of pollutants, including sediment, off-site. Construction BMPs would include, but not be limited to, Erosion Control and Sediment Control BMPs designed to minimize erosion and retain sediment on site. Per County requirements, sediment basins and other sediment

	control methods would be installed in the initial stage of construction in order to control sediment runoff.
Policy 6. Provisions shall be made to conduct surface water to storm drains or suitable watercourses to prevent erosion. Drainage devices shall be designed to accommodate increased runoff resulting from modified soil and surface conditions as a result of development. Water runoff shall be retained onsite whenever possible to facilitate groundwater recharge.	**Consistent.** As discussed in Section 4.10, *Hydrology and Water Quality*, the project would be required to comply with the SBCFCD requirements which allows a maximum stormwater discharge of 0.07 cubic feet per second (cfs) per acre of development for a 100-year storm events. The project includes an on-site retention/infiltration basin to retain and infiltrate stormwater on-site to reduce peak flows from the project site in compliance with the SBCFCD requirements. The Stormwater Control Plan prepared for the project describe the stormwater facility maintenance procedures to ensure that the proposed retention/infiltration facilities maintain the required reduced flow rates and minimize discharge of stormwater into off-site drainages.
Policy 7. Degradation of the water quality of groundwater basins, nearby streams, or wetlands shall not result from development of the site. Pollutants, such as chemicals, fuels, lubricants, raw sewage, and other harmful waste, shall not be discharged into or alongside coastal streams or wetlands either during or after construction.	**Consistent.** As discussed in Section 4.10, *Hydrology and Water Quality*, construction and operational BMPs would be required to reduce discharge of pollutants from the project site. Project construction would comply with the requirements of the SWRCB's Construction General Permit and County's grading code. In compliance with these requirements, a SWPPP would be prepared and construction BMPs implemented to control the discharge of pollutants off-site. Construction BMPs would include, but not be limited to, Erosion Control and Sediment Control BMPs designed to minimize erosion and retain sediment on site, and Good Housekeeping BMPs to prevent spills, leaks, and discharge of construction debris and waste into receiving waters. Project operation would comply with the requirements of the Phase II MS4 Permit and associated County guidance documents. Operational BMPs, including Source Control and LID BMPs, would be implemented and maintained. Proposed Source Control BMPs include storm drain inlet signage; education of owners, lessees, and operators; preservation of existing trees, shrubs, and groundcover; design of landscaping to minimize irrigation and runoff and promote infiltration; minimizing use of pesticide and fertilizers; use of pest-resident landscaping; sweeping of plazas, sidewalks, and parking lots; collection of debris from pressure washing; and collection of wash water containing cleaning agents or degreasers. LID BMPs include a retention/infiltration basin. The proposed BMPs would target and reduce discharge of stormwater runoff and pollutants of concern from the project site.
Land Use Element – Streams and Creeks Policies	
Policy 1. All permitted construction and grading within stream corridors shall be carried out in such a manner as to minimize impacts from increased runoff, sedimentation, biochemical degradation, or thermal pollution.	**Consistent.** Project construction would not occur within a stream corridor. However, three crossing of the on-site irrigation ditch would be constructed. Project construction would comply with the requirements of the SWRCB's Construction General Permit and County's grading code. In compliance with these requirements, a SWPPP would

	be prepared and construction BMPs implemented to control the discharge of pollutants off-site. Construction BMPs would include, but not be limited to, Erosion Control and Sediment Control BMPs designed to minimize erosion and retain sediment on site, and Good Housekeeping BMPs to prevent spills, leaks, and off-site discharge of construction debris and waste.
Land Use Element – Flood Hazard Area Policies	
Policy 1. All development, including construction, excavation, and grading, except for flood control projects and non-structural agricultural uses, shall be prohibited in the floodway unless off-setting improvements in accordance with federal regulations are provided. If the proposed development falls within the floodway fringe, development may be permitted, provided creek setback requirements are met and finished floor elevations are two feet above the projected 100-year flood elevation, and the other requirements regarding materials and utilities as specified in the Flood Plain Management Ordinance are in compliance.	**Consistent.** As discussed in Section 4.10, *Hydrology and Water Quality*, the project site is not subject to flooding. According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map No. 06083C0195F (FEMA 2005), the project site is not located within a floodplain or floodway. The site is located in Zone X, which comprises areas with minimal flood hazard that have been determined to be outside of the 0.2 percent annual chance flood (500-year flood).
Land Use Element – Historical and Archeological Sites Policies	
Policy 1. All available measures, including purchase, tax relief, purchase of development rights, etc., shall be explored to avoid development on significant historic, prehistoric, archaeological, and other classes of cultural sites.	**Consistent.** As discussed in Section 4.5, *Cultural and Tribal Cultural Resources*, there are no known archaeological or other cultural resources on the project site. Adherence to Mitigation Measures CUL-1 and CUL-2 would reduce impacts associated with the potential to unearth previously undiscovered cultural resources or tribal cultural resources during grading and construction. In the event of an unanticipated discovery of human remains during construction, the project would comply with requirements of the State of California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.8.
Policy 2. When developments are proposed for parcels where archaeological or other cultural sites are located, project design shall be required which avoids impacts to such cultural sites if possible.	**Consistent.** Adherence to Mitigation Measures CUL-1 and CUL-2 would reduce impacts associated with the potential to unearth previously undiscovered cultural resources or tribal cultural resources during grading and construction. In the event of an unanticipated discovery of human remains during construction, the project would comply with requirements of the State of California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.8.
Policy 3. When sufficient planning flexibility does not permit avoiding construction on archaeological or other types of cultural sites, adequate mitigation shall be required. Mitigation shall be designed to accord with guidelines of the State Office of Historic Preservation and the State of California Native American Heritage Commission.	**Consistent.** Adherence to Mitigation Measures CUL-1 and CUL-2 would reduce impacts associated with the potential to unearth previously undiscovered cultural resources or tribal cultural resources during grading and construction. In the event of an unanticipated discovery of human remains during construction, the project would comply with requirements of the State of California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.8.

Policy 4. Off-road vehicle use, unauthorized collection of artifacts, and other activities other than development which could destroy or damage archaeological or other cultural sites shall be prohibited.	**Consistent.** In the event that previously undiscovered cultural resources, human remains, or tribal cultural resources are unearthed during construction, the discovery would be properly handled. Unauthorized collection of artifacts or other activities that could destroy the find would be prohibited.
Policy 5. Native Americans shall be consulted when development proposals are submitted which impact significant archaeological or cultural sites.	**Consistent.** As discussed in Section 4.5, *Cultural and Tribal Cultural Resources*, details the Native American consultation efforts for the project. Pursuant to the requirements of AB 52 and SB 18, the County conducted Native American consultation for the proposed project to identify potential concerns or issues associated with Native American cultural resources within the project vicinity. No cultural resources were identified as a result of the records search, Sacred Lands File (SLF) search, and pedestrian survey. No specific tribal cultural resources have been identified on the project site to date. However, construction activities for the project have the potential to encounter previously unknown tribal cultural resources, Mitigation Measure CUL-2 would be required for the project. Mitigation Measure CUL-2 requires consultation with local Native American in the event that a resource of Native American origin is identified during construction.
Land Use Element–Other Open Lands Policies	
Policy 1. Preservation of open lands shall be encouraged under the Williamson Act.	**Consistent.** The project site and adjacent properties are not listed under the Williamson Act.
Land Use Element – Visual Resource Policies	
Policy 1. All commercial, industrial, and planned developments shall be required to submit a landscaping plan to the County for approval.	**Consistent**. The project would include approximately 16 acres of landscaping, primarily along the eastern and western perimeters, in the stormwater retention areas and basins, and in the parking areas. The landscaping plan prepared for the project would be submitted to the County for review and approval.
Policy 2. In areas designated as rural on the land use plan maps, the height, scale, and design of structures shall be compatible with the character of the surrounding natural environment, except where technical requirements dictate otherwise. Structures shall be subordinate in appearance to natural landforms; shall be designed to follow the natural contours of the landscape; and shall be sited so as not to intrude into the skyline as seen from public viewing places	**Consistent.** As discussed in Section 4.1, *Aesthetics*, for non-residential development on parcels zoned AG-II, the County of Santa Barbara Land Use and Development Code (LUDC) does not limit the height of structures. However, the project would be visually consistent with other agricultural processing facilities in the vicinity of the project site. In addition, the final design of the proposed structure would be subject to design review and applicable LUDC requirements (e.g., requirements to use colors and exterior finishes that would minimize the effects of a large development on the landscape). Compliance with applicable LUDC requirements would ensure the project would be visually compatible with nearby structures and the surrounding agricultural landscape.

Policy 4. Signs shall be of size, location, and appearance so as not to detract from scenic areas or views from public roads and other viewing points.	**Consistent.** As discussed in Section 4.1, *Aesthetics*, the project site is not visible from designated scenic corridors and is not located the vicinity of scenic vistas or resources. The project would be visually consistent with other agricultural processing facilities and agricultural uses in the vicinity of the project site. In addition, the final design of the proposed structure would be subject to design review and applicable LUDC requirements. To reduce impacts from project features, including signs, the LUDC requires use of building materials and colors (earth tones and non-reflective paints) to maximize the visual compatibility of the development with surrounding areas.
Policy 5. Utilities, including television, shall be placed underground in new developments in accordance with the rules and regulations of the California Public Utilities Commission, except where cost of undergrounding would be so high as to deny service.	**Consistent**. All utilities installed for the proposed project would be installed underground, in accordance with the rules and regulations of the California Public Utilities Commission and the project's conditions of approval.
Noise Element Policies	
Policy 1. In the planning of land use, 65 dB Day-Night Average Sound Level should be regarded as the maximum exterior noise exposure compatible with noise-sensitive uses unless noise mitigation features are included in project designs.	**Consistent.** As described in Section 4.12, *Noise, t*he nearest sensitive receivers to project construction and operation would not exceed County noise standards at these single-family residences. During construction, the loudest noise would be generated by dozer and grader working to grade the site, which would generate a noise level of 52 dBA $L_{eq.}$ During Operation, outdoor noise levels would be approximately 57 dBA L_{eq} at the nearest single-family residence to the southeast. As such, noise generated during project construction and operation would not exceed the County's 65 dBA standard for outdoor living areas
Policy 9. Noise level limits, applicable to new noise sources, should be incorporated into all commercial and industrial zoning districts and into conditional use permit requirements.	**Consistent.** Chapter 14 of the County Code regulates construction noise within the County. Chapter 14 does not specify noise level limits; however, Section 14-22 restricts grading activities to daytime hours, which is generally considered the least noise-sensitive time. Furthermore, the County's Comprehensive Plan provides noise level standard for outdoor living areas of new noise-sensitive land uses is 65 dBA CNEL. Outdoor living areas generally include backyards of single-family residences and individual patios or common outdoor activity areas of multi-family developments. The maximum noise exposure for indoor living areas in new noise-sensitive land uses is 45 dBA CNEL. As described in Section 4.12, *Noise,* during construction, the loudest noise would be generated by dozer and grader working to grade the site, which would generate a noise level of 52 dBA $L_{eq.}$ During Operation, outdoor noise levels would be approximately 57 dBA L_{eq} at the nearest single-family residence to the southeast. Interior noise levels would be 44 dBA CNEL at these single-family residents. As such, noise generated during project construction and operation would not exceed the County's noise standards.

Seismic Safety and Safety Element – Geologic and Seismic Policies	
Policy 1. The County shall minimize the potential effects of geologic, soil, and seismic hazards through the development review process.	**Consistent.** As discussed in Section 4.7, *Geology and Soils*, seismic risks exist throughout the project site, regardless of development included under the project. Implementation of the project would increase employees, structural development, and infrastructure that would be exposed to these hazards. Adherence to seismic design codes would reduce the potential for structural damage due to strong seismic shaking at the project site.
Policy 2. To maintain consistency, the County shall refer to the California Building Code, the Land Use Development Code, County Ordinances, the Coastal Land Use Plan, and the Comprehensive General Plan when considering the siting and construction of structures in seismically hazardous areas.	**Consistent.** All components of the project, including compliance with local, State, and federal regulations, would be reviewed, and approved by the Planning and Development Department in coordination with a County-approved resource specialist prior to implementation of the project.
Policy 6. The County should reference the Santa Barbara County Multi-Jurisdiction Hazard Mitigation Plan when considering measures to reduce potential harm from seismic activity to property and lives**.**	**Consistent.** As discussed in Section 4.7, *Geology and Soils*, Geologic and Seismic Protection Policy 6 and the Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan are mentioned and referenced to reduce potential harm from seismic activity to property and lives**.**

This page intentionally left blank.