

485 Acre Project has less Ag displacement and impacts. The 485 Acre project involves less direct project impact to Ag, since the DPR ag lands are not converted to development.

Alt. 1 B - has bigger impacts to Ag

1. Williamson Act Easement Exchange - involves immediate cancellation of Williamson Act contract (otherwise requires 10 years to terminate) and approval of development
 - a. The Statute requires specific findings - several key factual findings cannot be made:
 - i. That there are no other suitable alternative locations (non-Williamson Act contracted lands) that could accommodate the development. a) The WAEEP Staff Report and findings found 14 such lots, and there are probably others; b) TDR's \$20M could consume 29 Alt. 1 inland lots; c) there are 14 lots allowable under existing zoning that could include a single home under the Williamson Act.
 - ii. That the contracted lands are within 2 miles of an urban boundary. While a portion of the lands in question are within a 2 miles radius, the majority are not.
 - b. Loss of PRODUCTIVE Ag lands. Alt. 1 B places development on existing orchards, as does the DPR houses. While there are increased protections for the remaining ag lands, and first-time protections for DPR's orchards that are the basis for an increase in acreage, the on-the-ground impact is existing productive orchards will go under the blade, and no new, replacement orchards are required or contemplated as part of the project. The EIR evaluated ag impacts based on expectation that existing orchards on residential lots would be preserved, but that feature has been removed from the project.
2. ACE Adequacy - Agricultural Conservation Easements are offered as one of the principal benefits from Alt. 1 B, but the ACE language is weak, their enforcement is questionable, and ordinary requirements such as a baseline inventory are not required.
3. Ag impacts - EIR didn't find ag impacts Class 1 and failed to use LESAs model
4. PACEs - for the private and open space areas on the coastal bluff - the language of these controls is very cursory and insufficient