**ATTACHMENT 6**

# Policy Consistency Analysis

The table below revises the policy consistency analysis presented in the Hoop Structures Ordinance Amendment Final Environmental Impact Report (EIR). The analysis is updated to be consistent with the revisions to the Final EIR that are recommended by the Board of Supervisors.

Crop protection structures taller than 20 feet require a permit. Therefore, policy consistency will be analyzed on a case-by-case basis as part of an individual project's permit review.

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| **Land Use Element (LUE)** | |
| **LUE Land Use Development 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.** The proposed Project would amend the LUDC to clarify that hoop structures and shade structures (also known as crop protection structures) of any size (in general)[1] that are 20 feet or less in height would be exempt from permits, and that permits would be required for structures that would be taller than 20 feet. The installation and use of crop protection structures would not require additional public or private services and resources. These structures are typically installed over agricultural lands that are already in cultivation and are adequately accessed by existing public and private roads. As discussed in Section 4.4 of the environmental impact report (EIR), irrigation water demand is unlikely to increase. Finally, the use of these agriculture support structures does not increase the demand for new farm employees and therefore would not result in a need for new roads, additional domestic water, or sewer services. |
| **LUE Hillside and Watershed Protection 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 development because of known soil, geologic, flood, erosion or other hazards shall remain in open space.<br><br>**LUE Hillside and Watershed Protection 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 | **Consistent.** The intent of these policies is to address development of permanent structures that would require alteration of the natural terrain, including grading necessary to create a structural building pad. The proposed Project, would exempt the use of crop protection structures 20 feet or less in height. Installation of crop protection structures would not require grading or site preparation. Rather, these structures are oriented to follow the direction of the furrows of the cultivated fields, which are typically oriented in a direction that would conserve agricultural soils. Furthermore, installing hoop structures and shade structures over lands historically grazed or uncultivated natural habitats would not require grading associated with the development of structures.<br><br>As the proposed Project would not require grading to create a structural building pad, measures to prevent |

[1] Size limitations may apply within the CVC and D overlays.

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| stabilizing slopes should be in place before the beginning of the rainy season.<br><br>**LUE Hillside and Watershed Protection 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.<br><br>**LUE Hillside and Watershed Protection Policy #5:** Temporary vegetation, seeding, mulching, or other suitable stabilization methods shall be used to protect soils subject to erosion that have been distributed during grading or development. All cut and fill slopes shall be stabilized as rapidly as possible with planting of native grasses and shrubs, appropriate non-native plants, or with accepted landscaping practices.<br><br>**LUE Hillside and Watershed Protection 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. | runoff and sedimentation from a construction site, such as sediment basins, timing of construction grading activities, and temporary seeding or mulching would not be required.<br><br>In addition, hoop structures and shade structures would reduce the amount of rain (to varying degrees) directly falling onto agricultural fields, which can reduce the amount of sediment leaving any cultivated field during a rain event.<br><br>However, hoop structures could generate concentrated runoff from the impermeable plastic membranes during heavy rain events potentially increasing the amount of water, sediment, or pollutants leaving the agricultural site. As discussed in detail in Section 4.4 of the EIR, the State Water Quality Control Board's Central Coast Region Order No. R3-2017-0002 (Ag Order 3.0) addresses these issues by requiring farm operators to manage runoff and water quality from cultivated fields; and therefore, reduce the amount of sediment or pollutants that could leave the site during rain events. Ag Order 3.0 includes direction to use, for example, a variety of water quality protective measures to prevent erosion, reduce storm water runoff quantity and velocity, hold fine particles in place, and maintain existing, naturally occurring riparian vegetative cover, among others. Shade structures, with their permeable membranes would not generate as much runoff as some rain would percolate through the cloth depending on its permeability; however, farm operators utilizing shade structures must also manage runoff and water quality in compliance with Ag Order 3.0, as do farm operators that do not employ any crop protection structures. |
| **Hillside and Watershed Protection Policy #9:** Where agricultural development and/or agricultural improvements will involve the construction of service roads and the clearance of natural vegetation for orchard and vineyard development and/or improvements on slopes of 30 percent or greater, cover cropping or any other comparable means of soil protection, which may include alternative irrigation techniques, shall be utilized to minimize erosion until orchards and vineyards are mature enough to form a vegetative canopy over the exposed earth, or as recommended by the County Public Works Department. | **Consistent.** The proposed Project would allow the use and installation of crop protection structures 20 feet or less in height without a permit over agricultural lands that are already in cultivation. Should crop protection structures be proposed on non-historically cultivated lands or on lands with slopes steeper than 20%, a permit would be required and conditions of approval applied to minimize erosion and protect the soils consistent with the requirements of Hillside and Watershed Protection Policy #9. In any event, farm operators must comply with Ag Order 3.0 to minimize the movement of soil sediments from cultivated sites. In addition, the County Grading Code requires an agricultural erosion control permit for the construction of certain agricultural roads pursuant to Section 14-8 of the Grading Code in order to minimize erosion and protect the soils. |

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| **LUE Hillside and Watershed Protection 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.<br><br>**LUE Streams and Creeks 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.** As mitigated by MM-BIO-3, as revised by the Board of Supervisors (Revision Document RV 01, dated March 12, 2019), the proposed Project would include standards that require crop protection structures to be setback from streams and creeks at least 50 feet. This allows for the infiltration of some storm water runoff before it reaches a creek. As discussed above and in Section 4.4 of the EIR, farm operators must also comply with Ag Order 3.0 to reduce the rate of flow, quantity, and quality of storm water runoff leaving a site. Combined, these standards would minimize impacts to water quality and hydrology of streams associated with the use of hoop structures. |
| **LUE Flood Hazard Area 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 HUD regulations are provided. If the proposed development falls within the floodway fringe, development may be permitted, provided creek setback requirements are met and finish floor elevations are above the projected 100-year flood elevation, as specified in the Flood Plain Management Ordinance.<br><br>**LUE Flood Hazard Area Policy #2:** Permitted development shall not cause or contribute to flood hazards or lead to expenditure of public funds for flood control works, i.e., dams, stream channelization's, etc. | **Consistent.** The proposed Project does not include the development, grading, or construction of permanent structures that could affect the floodway or the floodway fringe (also known as the floodplain, or Special Flood Hazard Area). However, cultivated agriculture and the use of crop protection structures may occur anywhere within the floodway or floodway fringe. As discussed in detail in the EIR Revision Document RV 01 dated March 12, 2019, the County Flood Control District has determined that crop protection structures would not be inconsistent with the Floodplain Management Ordinance, Chapter 15A of the County Code, and would not impede flood waters. Conveyance capacities of the floodway are affected by many other variables that far exceed the de minimis encroachment of the crop protection structures metal frame. A major flooding event that would have sufficient energy to tear down crop protection structures and carry them downstream would be of such capacity that crop protection structures would not cause problems greater than the natural loading of trees, buildings, cars, and other debris that would be carried by such a flood. |
| **LUE Visual Resources 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.** The proposed Project would exempt crop protection structures of any size (in general) that are 20 feet or less in height and require permits for taller structures. At 20 feet or less, the height of exempt crop protection structures would be, in general, subordinate to landforms, would not intrude into the skyline, and would follow the natural contours of the land, as the furrows of cultivated fields typically follow the natural contours. Agricultural requirements dictate that these structures may be installed for several months to several years and may cover many acres of a farm at any one time because they are used to provide protection and enhance the production of agricultural crops. Depending on crop type and agricultural practices, the |

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| | membranes covering the frames may be temporarily removed or rolled back reducing the visibility of the structures during certain times of the crop's growth and production cycle.<br><br>Mitigation measure MM-VIS-1, as revised by Revision Document RV 01, dated March 12, 2019, would further minimize effects resulting from crop protection structures as seen from public roadways or other areas of public use. This measure would limit the exemption for the use of crop protection structures to 4,000 square feet per lot located within the Santa Ynez Valley Community Plan area Design Control Overlay on lots that can be viewed from public roads or from areas of public use. If larger, a permit would be required to allow the use. The Critical Viewshed Corridor Overlay includes the same size limit/permit threshold.<br><br>In addition, as revised by the Board of Supervisors, the ordinance amendment would limit the exemption for crop protection structures to slopes averaging 20% or less. By limiting the exemption, visual resources would be better protected on hillsides, consistent with the requirements of this policy, while requiring a permit for crop protection structures on slopes greater than 20% would allow consistency with this policy to be addressed on a site and project specific basis. |
| **Agricultural Element** | |
| **GOAL I:** The County shall ensure and enhance the continuation of agriculture as a major viable production industry in the County. Agriculture shall be encouraged. Where conditions allow (taking into account environmental impacts) expansion and intensification shall be supported.<br><br>**Policy I.B:** 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.<br><br>**Policy I.E.** 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.<br><br>**Policy I.G:** Sustainable agricultural practices on | **Consistent.** The proposed Project would support the continuation of agriculture as a major viable production industry in the County because it would clarify the permit regulations for crop protection structures and support expansion and intensification taking into account environmental impacts. As mitigated in the EIR, the Project would accomplish this by specifically allowing crop protection structures with a permit exemption, where no such allowance currently exists, exempting from permits the installation and use of these structures if 20 feet or less in height and meeting other exemption criteria. Should crop protection structures be proposed on lands that are not already historically cultivated, a permit would be required. As discussed in Chapter 2.0 and Section 4.3 of the EIR, hoop structures and shade structures are especially effective and important tools that allow the production of high value crops such as raspberries, blackberries, and blueberries. In addition, the use of crop protection structures may minimize effects on adjacent properties such as smoke, odor, and dust that are natural consequences of normal agricultural practices. Goal II, as supported by Agricultural Element Policies II.A through II.D, is |

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| agriculturally designated land should be encouraged in order to preserve the long-term health and viability of the soil.<br><br>**GOAL II:** Agricultural lands shall be protected from adverse urban influence.<br><br>**Policy II.D:** 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.<br><br>**Policy III.B.** It is a County priority to retain blocks of productive agriculture within Urban Areas where reasonable, to continue to explore programs to support that use, and to recognize the importance of the objectives of the County's Right-to-Farm Ordinance. | focused on protecting agricultural land from urban influences such as flooding and silting from urban development; vandalism, trespass, thievery, and roaming dogs; and the expansion of urban spheres of influence onto agricultural lands by the Local Agency Formation Commission. No such urban influences would result from this Project and the policies are not applicable. Thus, allowing the use of these structures could reduce the potential to convert highly productive agricultural lands in both Urban and Rural Areas, which in turn encourages the retention of such lands.<br><br>The permit exemption allows flexibility for the farmer to make decisions regarding the choice of crop based on economic, market, and other factors, while being able to respond quickly to a need to install and remove these structures. The non-permanent nature of these structures allows a farmer to remove the structures to prepare the fields to rotate in a different crop to maintain the health and viability of the soil and allow their use as an integral part of crop production, and to relocate and reuse them on other agricultural fields. |
| **Conservation Element** | |
| The Conservation Element contains numerous recommendations addressing water resources, ecological systems, mineral resources, agricultural resources, historic sites, archaeological sites, and conservation and energy. | **Consistent**. The proposed Project would conserve agricultural resources by clarifying that crop protection structures of any size (in general) that are 20 feet or less in height are exempt from permits, allowing farmers to continue employing these agricultural structures to support active farming operations. The use of crop protection structures, which can be installed, removed, and relocated over cultivated agricultural lands, would have no effect on water resources, mineral resources, historic sites, archaeological sites, or energy use because these structures are employed on cultivated agricultural lands, and use of electricity or other devices requiring the use of energy sources is not allowed within these structures.<br><br>As discussed in more detail in Section 4.4 of the EIR, the Project would not directly result in any new groundwater wells, nor would it result in additional groundwater extraction, nor would the Project result in any permanent impervious surfaces and even with hoop structures, precipitation would have the opportunity to infiltrate across a farm field between each hoop row. The area under hoop structures would still receive groundwater recharge, but through more concentrated points of infiltration.<br><br>Conservation of ecological (i.e., biological) resources is addressed by incorporating feasible mitigation measures MM-BIO-1, as revised by the Board of |

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| | Supervisors (Revision Document RV 01, dated March 12, 2019), and MM-BIO-3, as revised by the Board of Supervisors (Revision Document RV 01, dated March 12, 2019), into the ordinance amendment. These include setback requirements from streams and creeks, and requiring a permit for crop protection structures if proposed on lands that have not been historically intensively cultivated. |
| **Energy Element** | |
| The Energy Element provides a variety to goals and policies to improve energy efficiency, reduce reliance on fossil fuels, and reduce air emissions through a variety of actions. | **Consistent.** The proposed Project would not allow the use of electricity or other mechanical equipment that would require the use of fossil fuels. Rather crop protection structures allow a farmer to harness the energy of the sun and by manually adjusting the impermeable or permeable membranes, to take advantage of passive heating and cooling to optimize growing conditions while protecting the crop from frosts, freezes, wind, and extreme heat due to variable climatic conditions. Thus, the proposed Project would not result in any reliance on fossil fuels. |
| **Environmental Resources Management Element** | |
| ERME is a compendium and synthesis of the Seismic Safety and Safety, Conservation, Open Space, and Scenic Highways Elements and identifies environmental constraints on urban development, such as prime agricultural lands, steep slopes, biological habitat areas, floodplains and floodways, and geologic hazards. | **Consistent.** The proposed Project specifically clarifies the use of and permit requirements for crop protection structures: movable agricultural structures that are already being employed on agricultural lands. Crop protection structures are installed over cultivated agricultural lands, whether prime soils or not, to protect and enhance production of specialty agricultural crops. The Project would not result in urban development but would promote the continuation of agriculture as a viable and important contributor to the County's economy. |
| **Open Space Element** | |
| The Open Space Element addresses open space for public health and safety, the managed production of resources, including agriculture, outdoor recreation and the preservation of natural resources. | **Consistent.** The proposed Project is located on lands zoned for agriculture, most of which are located within the Rural Areas of the County, which support substantial open space areas. The Project would support the continuation of agriculture as a viable economic use without affecting public health and safety or outdoor recreation. |
| **Scenic Highways Element** | |
| The Scenic Highways Element contains several preservation measures for scenic highways and their designation to assist in preserving and enhancing the most scenic areas along designated roadways within the | **Consistent.** Three designated Scenic Highways traverse the rural areas of the County: U.S. Highway (US) 101 from the City of Goleta to the junction with State Route (SR) 1, SR 1 from its junction with US 101 to the City |

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| County. The preservation measures within this Element include the regulation of land use to ensure that development in the scenic corridor will not conflict with the scenic objectives, a requirement for development plans for urban areas within the scenic corridors and overlays in rural areas, control of outdoor advertising, regulation of grading and landscaping, and design of structures and equipment. | of Lompoc, and SR 154. As discussed in Section 4.2 Visual Resources, these highways provide high-quality views of a rural agricultural landscape and open space. On the South Coast, a Critical Viewshed Corridor (CVC) Overlay applies to highly visible areas near US 101 within the Gaviota Coast Plan area. The proposed Project would limit the exemption for the use of crop protection structures within the CVC Overlay to 4,000 square feet per lot to be consistent with this overlay, and otherwise require a permit. However, larger crop protection structures would also be exempt if they would not be visible from public roads and public viewing areas.<br><br>In addition, mitigation measure MM-VIS-1, as revised by Revision Document RV 01, dated March 12, 2019, would further minimize effects resulting from crop protection structures as seen from public roadways or other areas of public use. This measure would limit the exemption for the use of crop protection structures to 4,000 square feet per lot located within the Santa Ynez Valley Community Plan area Design Control Overlay on lots that can be viewed from public roads or from areas of public use. If larger, a permit would be required to allow the use, unless the crop protection structures would not be visible from public roads and public viewing areas. The Critical Viewshed Corridor Overlay includes the same size limit/permit threshold.<br><br>The proposed Project would exempt crop protection structures of any size (in general) that are 20 feet or less in height and require permits for taller structures. At 20 feet or less, the height of exempt crop protection structures would be, in general, subordinate to landforms, would not intrude into the skyline, and would follow the natural contours of the land, as the furrows of cultivated fields typically follow the natural contours. Agricultural requirements dictate that these structures may be installed for several months to several years and may cover many acres of a farm at any one time because they are used to provide protection and enhance the production of agricultural crops. Depending on crop type and agricultural practices, the membranes covering the frames may be temporarily removed or rolled back reducing the visibility of the structures during certain times of the crop's growth and production cycle as viewed from Scenic Highways. |
| **Eastern Goleta Valley Community Plan** | |
| **Policy EGV-6.2:** Local cultivation of edible products should be encouraged consistent with County codes.<br><br>**Policy LUA-EGV-1.1:** Agricultural resources, | **Consistent.** The proposed Project would support the continuation of agriculture as a major viable production industry in the County because it clarifies the permit |

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| agricultural land uses and operations, and distinctive urban and rural agricultural characteristics shall be preserved to the greatest extent feasible. | regulations for crop protection structures, and allows the installation and use of these support structures of any size (in general) without a permit if 20 feet or less in height and meeting other exemption criteria. As discussed in Chapter 2.0 of the EIR, hoop and shade structures are valuable tools that allow the production of high value crops such as raspberries, blackberries, and blueberries. The permit exemption allows flexibility for the farmer to make decisions on the choice of crop based on economic, market, and other factors while being able to respond quickly as to whether to install and remove these crop protection structures. The nature of these structures allows a farmer to remove the structures to prepare the fields to rotate in a different crop to maintain the health and viability of the soil and allow their use as an integral part of crop production. |
| **OBJECTIVE RRC-EGV-1:** Maximize solid waste diversion and minimize solid waste generation.<br><br>**Policy RRC-EGV-1.1:** Opportunities for resource recovery and landfill solid waste diversion shall be provided. | **Consistent.** As discussed in detail in Section 4.5 of the EIR, the materials used in crop protection structures are recyclable, consisting of a steel frame and a plastic membrane cover. Steel is readily recyclable. The plastic materials are also recyclable; however, whether the plastics are recycled once their usefulness has reached an end (typically three years) depends on the recycling market for plastics. The major barrier to agricultural plastics recycling is the lack of a consistent recycling market for the plastics. Every effort continues to recycle plastics from current agricultural operations and these efforts would continue into the future; no more effective measures have been identified. |
| **OBJECTIVE HYD-EGV-1:** Minimize pollution of streams, sloughs, drainage channels, groundwater basins, estuaries, the ocean and areas adjacent to such waters.<br><br>**Policy HYD-EGV-1.1:** Introduction of contaminated urban and agricultural runoff into all coastal waters, including sloughs, rivers, streams, coastal wetlands and intertidal areas, shall be eliminated or minimized. | **Consistent.** As mitigated (MM-BIO-3), the proposed Project would include standards that require crop protection structures to be setback from streams and creeks at least 50 feet in Urban Areas, Inner Rural Areas, and EDRNs, and 100 feet in Rural Areas. This allows for the infiltration of some storm water runoff before it reaches a creek. As discussed above and in Section 4.4 of the EIR, farm operators must also comply with Ag Order 3.0 to reduce the rate of flow, quantity, and quality of storm water runoff leaving a site. Combined, these standards would minimize impacts to water quality and hydrology of streams associated with the use of hoop structures. |
| **OBJECTIVE HYD-EGV-2**: Minimize potential flood hazards.<br><br>**Policy HYD-EGV-2.1:** Adequate setbacks from floodways and flood hazards shall be required.<br><br>**Policy HYD-EGV-2.2:** Setbacks of a minimum of 50 feet from top of bank but adjusted upward as needed to | **Consistent.** The proposed Project does not include the development, grading, or construction of permanent structures that could impact the floodway or the floodway fringe (also known as the floodplain, or Special Flood Hazard Area). However, cultivated agricultural and use of crop protection structures may occur anywhere within the floodway or floodway |

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| adequately protect life and property from potential flood hazards shall be required as determined by County Flood Control. | fringe. As discussed in detail in the EIR Revision Document RV 01, dated March 12, 2019, the County Flood Control District has determined that crop protection structures would not be inconsistent with the Floodplain Management Ordinance, Chapter 15A of the County Code, and would not impede flood waters. Conveyance capacities of the floodway are affected by many other variables that far exceed the de minimis encroachment of the crop protection structures metal frame. A major flooding event that would have sufficient energy to tear down crop protection structures and carry them downstream would be of such capacity that crop protection structures would not cause problems greater than the natural loading of trees, buildings, cars, and other debris that would be carried by such a flood. In addition, MM-BIO-3 requires minimum setbacks from streams and creeks of 50 feet to protect riparian biological resources. This setback would also ensure consistency with Policy HYD-EGV-2.2 requirements. |
| **Policy ECO-EGV-3.1:** Habitats that shall be preserved and enhanced include, but are not limited to:<br>• Creeks, streams, and waterways, and fish passage<br>• Wetlands and vernal pools<br>• Riparian vegetation<br>• Wildlife corridors between habitat areas<br>• Roosting, nesting, and foraging habitat for bird species<br>• Nesting and foraging habitat for subterranean species<br><br>**Policy ECO-EGV-3.3:** In rural areas and where major wildlife corridors are present in urban areas, development shall not interrupt major wildlife travel corridors within Eastern Goleta Valley. Typical wildlife corridors are provided by drainage courses and similar undeveloped natural areas.<br><br>**Policy ECO-EGV-5.4:** ESH and RC Habitat Types: Specific biological resources and habitats shall be considered environmentally sensitive.<br><br><u>1. ESH Habitat Types</u>: In the Urban, Inner-Rural, EDRNs and Mountainous Areas …<br>• Riparian woodlands and riparian corridors<br>• Monarch butterfly roosts<br>• Sensitive native flora<br>• Coastal sage scrub<br>• Chaparral where it supports rare or vulnerable native vegetation alliances and/or sensitive native plant and/or animal species<br>• Oak woodlands | **Consistent.** In order for crop protection structures to be considered exempt from permits, crop protection structures must be consistent with the Comprehensive Plan. The proposed Project is located on lands zoned for agriculture, most of which are located within the Rural Area. However, Eastern Goleta Valley also supports two blocks of productive farmland in the Urban Area: the San Marcos Agricultural Area and the South Patterson Agricultural Area. These lands have been historically cultivated for decades and support few native habitats with the exception of creeks and streams; therefore, native habitats would not be affected by the Project.<br><br>MM-BIO-3 identified in Section 4.6 of the EIR and as revised by the Board of Supervisors (Revision Document RV 01, dated March 12, 2019), requires the incorporation of creek setbacks into ordinance amendment (50 feet), which meet the requirements of these policies. In summary, the proposed Project, as mitigated, would be consistent with these policies of the Eastern Goleta Valley Community Plan aimed at the protection of biological resources. |

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| • Native grasslands<br>• Wetlands<br>• Critical wildlife habitat<br>• Wildlife corridors<br><br>2. RC Habitat Types: On lands designated Agriculture in the Rural Area …<br><br>• Riparian woodlands and riparian corridors<br><br>**Policy ECO-EGV-5.5:** Minimum Buffer Areas for ESH: The minimum buffer strip and setbacks from streams and creeks for development and activities within the ESH overlay that are regulated by the County Zoning Ordinances shall be as follows, except on parcels designated for agriculture in rural areas where Policy ECO-EGV-5.6 shall apply:<br><br>• ESH areas within the Urban Area and EDRNs: a minimum setback of 50 feet from either side of top-of-bank of creeks or existing edge of riparian vegetation, whichever is further<br><br>**Policy ECO-GV-5.6: Minimum Buffer Areas for RC:** The minimum buffer strip and setback from streams and creeks for development and activity within the RC Overlay that are regulated by the County Zoning Ordinances shall be as follows: … a minimum setback of 25 feet from the top of the bank or the edge of existing riparian vegetation, whichever is further, minimizing ground disturbance and vegetation removal, and prohibiting development of buildings within 50 feet of the top of bank or the edge of existing riparian vegetation.<br><br>**Policy ECO-EGV-6.1:** Native woodlands, native grasslands, and coastal sage scrub shall be preserved and protected as viable and contiguous habitat areas.<br><br>**DevStd ECO-EGV-6B:** Native Woodland Buffer Areas: Within urban areas and existing developed rural neighborhoods, native woodlands shall be preserved by providing a minimum 25-foot buffer around the respective habitat area.<br><br>**DevStd ECO-EGV-6C:** Native Grassland and Coastal Sage Scrub Buffer Areas: Native grasslands and coastal sage scrub shall be preserved by providing a minimum 25-foot buffer vegetated with native species.<br><br>**Policy ECO-EGV-6.4:** Natural stream channels and conditions shall be maintained in an undisturbed state in order to protect banks from erosion, enhance wildlife passageways, and provide natural greenbelts.<br><br>**DevStd ECO-EGV-6I:** No structures shall be located within a riparian corridor. | |

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| **Policy HA-EGV-1.3:** To the greatest extent feasible, significant historic and/or cultural landscapes shall be preserved, including those emblematic of Native American tribes, early pioneers, ranch and agricultural operations, and the development of the community over the long term. | **Consistent.** As discussed in Section 7.4.2 of the EIR, the proposed Project would not have significant effects on cultural resources. Pursuant to Public Resources Code (PRC) 21080.3.1, the County notified Native Americans, listed by the Native American Heritage Commission as requesting such notice, regarding the proposed Project and the commencement of environmental review. The County received no response from any of the notified individuals regarding any potential for the project to impact cultural resources. Therefore, the proposed Project would be consistent with this policy. |
| **OBJECTIVE HA-EGV-2:** Protect and preserve significant tribal cultural resources in the Plan area.<br><br>**Policy HA-EGV-2.1:** Significant tribal cultural resources of concern to the Chumash Indians should be protected and preserved to the maximum extent feasible. | **Consistent.** As discussed in Section 7.4.2 of the EIR, the proposed Project would not have significant effects on cultural resources. Pursuant to PRC 21080.3.1, the County notified Native Americans, listed by the Native American Heritage Commission as requesting such notice, regarding the proposed Project and the commencement of environmental review. The County received no response from any of the notified individuals regarding any potential for the Project to impact cultural resources. Therefore, the proposed Project would be consistent with these policies. |
| **Policy VIS-EGV-1.1:** Development should minimize impacts to open space views as seen from public vistas and scenic local routes and avoid impairment of significant visual resources.<br><br>**Policy VIS-EGV-1.2: Public Vistas and Scenic Local Routes**: Prominent views to and from the following Public Vistas and along and through Scenic Local Routes shall be preserved and enhanced:<br>• Santa Ynez Mountains and rural foothills<br>• Undeveloped skyline<br>• Coastal resources, including sloughs, beaches, wetlands, bluffs, mesas, the Santa Barbara Channel and islands<br>• Open space, or other natural area<br>• Natural watershed resources, such as creek/riparian corridors, wetlands, vernal pools, habitat areas, etc.<br>• Rural agricultural and mountainous areas<br><br>**Policy VIS-EGV-1.10:** In hillside areas, structures shall avoid the use of highly reflective materials, or be sited to minimize visible glare, with the exception of solar panel installations. | **Consistent.** The proposed Project would exempt crop protection structures of any size (in general) that are 20 feet or less in height and require permits for taller structures. At 20 feet or less, the height of exempt crop protection structures would be, in general, subordinate to landforms, would not intrude into the skyline, and would follow the natural contours of the land, as the furrows of cultivated fields typically follow the natural contours. These structures may be installed for several months to several years and may cover many acres of a farm at any one time because they are used to provide protection and enhance the production of agricultural crops. Depending on crop type and agricultural practices, the membranes covering the frames may be temporarily removed or rolled back reducing the visibility of the structures during certain times of the crop's growth and production cycle. |
| **Gaviota Coast Plan** | |
| **Policy NS-1: Watershed Planning.** Planning efforts associated with long-term plans, programs, and projects | **Consistent.** The proposed Project is located on lands zoned Agricultural II (AG-II), which covers a |

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| shall be considered in light of the conditions of, and in context with, the local watershed. Where feasible, watershed health shall be enhanced through implementation of these planning efforts.<br><br>**Policy NS-4: ESH Criteria and Habitat Types.** …<br><br>**Policy NS-6: Wildlife Corridors.** Development shall avoid to the maximum extent feasible and otherwise minimize disruption of identified wildlife travel corridors.<br><br>**Policy NS-7: Riparian Vegetation.** Riparian vegetation shall be protected to the maximum extent feasible. … Specific biological habitats are considered environmentally sensitive … The list includes, but is not limited to:<br><br>1) Native Forests and Woodlands<br>2) Rare Native Chaparral and Coastal Scrub Habitats<br>3) Rare Native Grassland and Herbaceous Vegetation<br>4) Coastal Wetlands<br>5) Marine mammal haulouts<br>6) Monarch butterfly habitat<br>7) Raptor nesting and breeding areas<br>8) Special status species habitats<br><br>**Policy NS-9: Natural Stream Channels.** With the exception of local, state, or federal resource agency permitted activities, natural stream channels and conditions shall be maintained in an undisturbed state to the maximum extent feasible in order to protect banks from erosion, enhance wildlife passageways, and provide natural greenbelts.<br><br>**Dev Std NS-2: ESH Setbacks and Buffers.** *(INLAND)* Mapped riparian ESH-GAV overlay areas shall have a development area setback buffer of 100 feet from the edge of either side of the top-of-bank of creeks or the existing edge of riparian vegetation, whichever is further. Development within other ESH areas shall be required to include setbacks or undeveloped buffer zones from these areas as part of the proposed development. | significant area of the Inland Gaviota Coast Plan area. The Project, as mitigated by MM-BIO-1, would limit the exemption for crop protection structures to agricultural lands that have been historically intensively cultivated, which would protect the environmentally sensitive habitats identified by the Gaviota Coast Plan natural resources stewardship policies. In other locations, a permit would be required for new cultivation employing crop protection structures, which would allow policy consistency to be determined on a site-specific, case-by-case basis. With MM-BIO-3, as revised by the Board of Supervisors (Revision Document RV 01, dated March 12, 2019), the Project would protect watersheds, wildlife corridors, riparian habitat, and natural stream channels through the inclusion of a 50-foot setback of crop protection structures in Rural Areas from streams and creeks. However, pursuant to LUDC Subsection 35.20.020.C, any land use and structure, including any exempt crop protection structures, must comply with applicable Comprehensive Plan policies and development standards, including community plan development standards such as Dev Std NS-2. |
| **Policy CS-1: Cultural Resources Preservation & Protection.** Preserve and protect significant cultural, archaeological and historical resources to the maximum extent feasible.<br><br>**Policy CS-2: Properties of Concern.** Significant cultural resources including historic structures, Rural Historic Landscapes, archaeological sites, Traditional Cultural Properties, and Tribal Cultural Resources shall be protected and preserved to the maximum extent feasible. | **Consistent.** As discussed in Section 7.4.2 of the EIR, the proposed Project would not have significant effects on cultural resources. Pursuant to PRC 21080.3.1, the County notified Native Americans, listed by the Native American Heritage Commission as requesting such notice, regarding the proposed Project and the commencement of environmental review. The County received no response from any of the notified individuals regarding any potential for the Project to impact cultural resources. Therefore, the proposed Project would be consistent with these policies. |
| **Policy AG-I.A: Protect and Support Agricultural** | **Consistent.** The proposed Project would support the |

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| **Land Use.** Land designated for agriculture shall be preserved and protected for agricultural use; the integrity of agricultural operations shall not be violated by non-compatible uses.<br><br>**Policy AG-1.E: Rights of Operation.** 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 that is consistent with: (1) sound agricultural practices that promote the long-term viability of agriculture and (2) applicable resource protection policies and regulations.<br><br>**Policy AG-1.B: Long-Term Agricultural Production.** To the extent feasible, the County shall protect agricultural land, continued agricultural uses and the agricultural economy by sustaining agricultural production and discouraging conversions or other uses that are incompatible with long-term agricultural production.<br><br>**Policy AG-1.K: Sustainable Agricultural Practices.** Sustainable agricultural practices on agriculturally designated land should be encouraged in order to preserve the long-term health and viability of the soil. | continuation of agriculture because the Project would clarify the permit regulations for crop protection structures. As mitigated in the EIR, the Project would accomplish this by providing an exemption from permits for the installation and use of crop protection structures 20 feet or less in height and meeting other exemption criteria. As discussed in Chapter 2.0 and Section 4.3 of the EIR, crop protection structures are especially effective and important tools that allow the production of high value crops such as raspberries, blackberries, and blueberries.<br><br>The permit exemption allows flexibility for the farmer to make decisions on the choice of crop based on economic, market, and other factors while being able to respond to a need to install and remove these structures. The non-permanent nature of these structures allows a farmer to remove the structures to prepare the fields to rotate in a different crop to maintain the health and viability of the soil and allow their use as an integral part of crop production, and to relocate and reuse them on other agricultural fields. |
| **Policy VIS-1: Visual Compatibility.** The height, scale, and design of structures shall be compatible with the character of the surrounding natural and agricultural environment.<br><br>**Policy VIS-2: Visually Subordinate Development.** Development shall be visually subordinate to the natural and agricultural environment as seen from public viewing places. Visual subordinance shall be achieved through adherence to the Site Design Hierarchy and Design Guidelines. "Visually subordinate" is defined as development that is partially visible but not dominant or disruptive in relation to the surrounding landscape as viewed from a public viewing place.<br><br>**Policy VIS-3: Skyline Intrusion.** Where feasible, development shall be sited so as not to intrude into the skyline as seen from public viewing places.<br><br>**Policy VIS-5: Lighting.** The night sky and surrounding land uses shall be protected from excessive and unnecessary light associated with development.<br><br>**Policy VIS-12: Critical Viewshed Corridor.** Protection of the ocean and mountain views of the Gaviota Coast from Highway 101 is critically important. Therefore, a Critical Viewshed Corridor Overlay, providing more | **Consistent.** The proposed Project would exempt crop protection structures of any size (in general) that are 20 feet or less in height within the Inland Area of the Gaviota Coast, and require permits for taller structures. Lands located nearest to US 101 are located in the CVC Overlay. The proposed Project would limit the exemption for the use of crop protection structures within the CVC Overlay to 4,000 square feet per lot to be consistent with this overlay, and otherwise would require a permit. However, larger crop protection structures would also be exempt if they would not be visible from public roads and public viewing areas. In order for crop protection structures to be considered exempt from permits, crop protection structures must be consistent with the Comprehensive Plan. Therefore, crop protection structures that would be located within the CVC Overlay must follow the Site Design Hierarchy and Design Guidelines to be consistent with Policy VIS-13.<br><br>At 20 feet or less, the height of exempt crop protection structures would be, in general, subordinate to landforms, would not intrude into the skyline, and would follow the natural contours of the land, as the furrows of cultivated fields typically follow the natural contours. Agricultural requirements dictate that crop |

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| protective viewshed policies for development permits within the overlay, is designated for the Gaviota Coast.<br><br>**Policy VIS-13: Development Visibility.** Development within the Critical Viewshed Corridor shall be screened to the maximum extent feasible as seen from Highway 101. Screening shall be achieved through adherence to the Site Design Hierarchy and Design Guidelines. | protection structures may be installed for several months to several years and may cover many acres of a farm at any one time because they are used to provide protection and enhance the production of agricultural crops. Depending on crop type and agricultural practices, the membranes covering the frames may be temporarily removed or rolled back, reducing the visibility of the structures during certain times of the crop's growth and production cycle. Lighting is not allowed in crop protection structures, and therefore, the project would be consistent with policies protecting the night sky from excessive light. |
| **Policy VIS-6: Design Review.** All permit applications for structures, additions to structures, or signage within the Gaviota Coast Plan Area shall be reviewed and considered for approval by the County Board of Architectural Review unless exempt pursuant to the County Zoning Ordinances. P&D and the Board of Architectural Review shall apply the Gaviota Coast Plan Design Guidelines in approving future development. | **Consistent.** Structures that are exempt from permits are not required to undergo design review. However, as noted above, to qualify for an exemption, the size of crop protection structures would be limited to 4,000 square feet per lot within the CVC Overlay. Larger crop protection structures would require a permit (unless not visible from public roadways or other public viewing areas), undergo design review, and must comply with the Site Design Hierarchy and Design Guidelines to minimize visibility from US 101. Design review is intended to address visual and aesthetic concerns by carefully locating a building or structure on the land and considering good architectural design. Crop protection structures are simple, functional structures intended to be used on actively cultivated agricultural land to protect and enhance the growing environment of crops. The structures do not lend themselves to architectural design solutions. Outside of the CVC Overlay, larger crop protection structures taller than 20 feet would require a permit and in those instances, design review may be required, which could include landscaping (pursuant to Gaviota Coast Plan policies) to address these taller structures. |
| **Policy TEI-14: Surface and Groundwater Pollution.** Pollution of surface and groundwater shall be avoided. Where contribution of potential pollutants of any kind is not prohibited and cannot be avoided, such contribution shall be minimized to the maximum extent practical. | **Consistent.** As mitigated by MM-BIO-3, as revised by the Board of Supervisors (Revision Document RV 01, dated March 12, 2019), the proposed Project would include standards that require crop protection structures to be setback from streams and creeks at least 50 feet. This allows for the infiltration of some storm water runoff before it reaches a creek. As discussed above and in Section 4.4 of this EIR, farm operators must also comply with Ag Order 3.0 to reduce the rate of flow, quantity, and quality of storm water runoff leaving a site. Combined, these standards would minimize impacts to water quality and hydrology of streams associated with the use of hoop structures. |

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| **Mission Canyon Community Plan** | |
| **GOAL BIO-MC-1:** The native and created biological diversity of Mission Canyon is an important asset that shall be protected, preserved, and enhanced.<br><br>**Policy BIO-MC-3:** The following biological resources and habitats, as identified and generally described by the Community Plan, shall be presumed to be "environmentally sensitive,"<br><br>• Habitats containing Nuttall's scrub oak or other special status animal or plant species or rare natural communities<br>• Central and Southern Coast Live Oak Riparian Forest and Woodland<br>• Coast Live Oak Woodland and Forest<br>• California Sycamore Riparian Forest<br>• Coast Live Oak/Olive Riparian Woodland<br>• Central Coast Arroyo Willow Riparian Forest<br>• Wetland Habitats<br>• Native grasslands or other habitats with understory dominated by native grass species<br><br>**DevStd BIO-MC-3.3:** Development shall be required to include the following ESH buffer areas:<br><br>• Creeks and streams, including steelhead critical habitat streams–50 feet<br>• Central and Southern Coast Live Oak Riparian Forest and Woodland, Coast Live Oak/Olive Riparian Woodland, California Sycamore Riparian Forest, and Central Coast Arroyo Willow Riparian Forest–50 feet from edge of canopy<br>• Coast Live Oak Woodland and Forest–25 feet from edge of canopy<br>• Habitats containing Nuttall's scrub oak or other special status animal or plant species or rare natural communities–25 feet minimum<br>• Wetland Habitats–50 feet from edge of wetland habitat.<br><br>**DevStd BIO-MC-3.3:** Development shall be required to include the following ESH buffer areas:<br><br>• Creeks and streams, including steelhead critical habitat streams–50 feet as measured from the geologic top of creek bank.<br><br>**Policy BIO-MC-7:** Natural stream corridors shall be maintained in an undisturbed state to the maximum extent feasible in order to protect water quality, protect banks from erosion, enhance wildlife passageways, and provide natural greenbelts. | **Consistent.** Agriculturally zoned lands in Mission Canyon, where the Project would apply, are located in the Urban Area, zoned Agricultural I (AG-I), and located primarily on slopes that are mostly greater than 40 percent and to a lesser extent between 20 percent and 40 percent. Relatively little of the land is cultivated and where it is cultivated, the primary crops are orchards. Cultivation of specialty crops that would benefit from hoop structures is unlikely on a large scale. However, such use is possible. In order for crop protection structures to be considered exempt from permits, crop protection structures must be consistent with the Comprehensive Plan.<br><br>As mitigated, the proposed Project considers the protection of watersheds, wildlife corridors, riparian habitat, and natural stream channels through the inclusion of a 50-foot setback of crop protection structures from streams and creeks in the Urban Area (MM-BIO-3, as revised by the Board of Supervisors (Revision Document RV 01, dated March 12, 2019). In addition, the proposed Project, as mitigated by MM-BIO-1, would limit the exemption for crop protection structures to agricultural lands that have been historically intensively cultivated, which would protect the environmentally sensitive habitats identified in the Mission Canyon Community Plan biological resources policies and development standards. In other locations, a permit would be required for new cultivation employing crop protection structures, which would allow policy consistency to be determined on a site-specific basis. |

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| **DevStd BIO-MC-8.1:** Development shall be setback a minimum 50 feet from the geologic top of bank of any stream or creek or outside edge of riparian vegetation, whichever is greater. | |
| **GOAL FLD-MC-1:** Minimize flooding and drainage problems in Mission Canyon.<br><br>**Policy FLD-MC-1:** Flood and drainage risks shall be minimized through appropriate design and land use controls.<br><br>**DevStd FLD-MC-1.1:** Development shall not be allowed within floodways except in conformance with Chapters 15A and 15B of the County Code, other applicable statutes or ordinances, and applicable provisions of the Comprehensive Plan, including but not limited to policies regarding biological resources and public safety. | **Consistent.** The proposed Project does not include the development, grading, or construction of permanent structures that could impact the floodway or the floodway fringe (also known as the floodplain, or Special Flood Hazard Area). However, cultivated agriculture and crop protection structures may occur anywhere within the floodway or floodway fringe. As discussed in detail in the EIR Revision Document RV 01, dated March 12, 2019, the County Flood Control District has determined that crop protection structures would not be inconsistent with the Floodplain Management Ordinance, Chapter 15A of the County Code, and would not impede flood waters. Conveyance capacities of the floodway are affected by many other variables that far exceed the de minimis encroachment of the crop protection structures metal frame. A major flooding event that would have sufficient energy to tear down crop protection structures and carry them downstream would be of such capacity that crop protection structures would not cause problems greater than the natural loading of trees, buildings, cars, and other debris that would be carried by such a flood. In addition, MM-BIO-3, as revised by the Board of Supervisors (Revision Document RV 01, dated March 12, 2019), requires minimum setbacks from streams and creeks of 50 feet to protect riparian biological resources, which also contributes to public safety. |
| **Policy FLD-MC-2:** Erosion of soils and movement of sediment into natural and manmade drainages shall be minimized during construction activities. | **Consistent.** The proposed Project does not include the development, grading, or construction of permanent structures. The amount of land zoned AG-I in the Mission Canyon Community Plan area is small and generally located on steep slopes. These lands, if farmed, are typically planted with orchard crops that do not benefit from the use of crop protection structures. This policy intends to address erosion of soils resulting from construction activities. Crop protection structures are movable structures erected over cultivated agricultural fields without foundation or walls, and do not require grading or construction activities in order to install them. Therefore, erosion of soils and movement of sediment during construction activities would not occur. |
| **GOAL FLD-MC-2:** Protect stream corridors from sedimentation, pollutants, or other impacts of upstream development. | **Consistent.** As mitigated by MM-BIO-3, as revised by the Board of Supervisors (Revision Document RV 01, dated March 12, 2019), the proposed Project would include standards that require crop protection structures |

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| **Policy FLD-MC-3:** Impacts to the Mission Creek watershed from development shall be minimized through site design and onsite management of storm water to the maximum extent practicable. | to be setback from streams and creeks at least 50 feet in Urban Areas. This allows for the infiltration of some storm water runoff before it reaches a creek. As discussed above and in Section 4.4 of the EIR, farm operators must also comply with Ag Order 3.0 to reduce the rate of flow, quantity, and quality of storm water runoff leaving a site. Combined, these standards would minimize impacts to water quality and hydrology of streams associated with the use of hoop structures. |
| **GOAL VIS-MC-1:** Protect the visual and aesthetic resources of Mission Canyon, including public views of the mountains and ocean and the quality of the nighttime sky.<br><br>**Policy VIS-MC-1:** Development shall be sited and designed to protect views as seen from public viewing places.<br><br>**Policy VIS-MC-2:** The nighttime sky of Mission Canyon shall be protected from excessive and unnecessary light associated with new development and redevelopment. | **Consistent.** The proposed Project would exempt crop protection structures of any size (in general) that are 20 feet or less in height and require permits for taller structures. At 20 feet or less, the height of exempt crop protection structures would be, in general, subordinate to landforms, would not intrude into the skyline, and would follow the natural contours of the land, as the furrows of cultivated fields typically follow the natural contours. These structures may be installed for several months to several years and may cover many acres of a farm at any one time because they are used to provide protection and enhance the production of agricultural crops. Depending on crop type and agricultural practices, the membranes covering the frames may be temporarily removed or rolled back reducing the visibility of the structures during certain times of the crop's growth and production cycle. Lighting is not allowed these structures, and therefore, the project would be consistent with policies protecting the night sky from excessive light. |
| **Orcutt Community Plan** | |
| **Policy LUA-O-1:** The County shall develop and promote programs to preserve agriculture in the Santa Maria Valley. | **Consistent.** The proposed Project would amend the LUDC to clarify that crop protection structures of any size (in general) that are 20 feet or less in height would be exempt from permits when also meeting other exemption criteria, and that permits would be required for structures that would be taller than 20 feet. The Project would aid in the preservation of agriculture in the Santa Maria Valley by allowing most farmers to respond quickly to market and climatic conditions in determining choice of crop and use of crop protection structures without incurring the time and expense needed to obtain permits. |
| **Policy WAT-O-2:** In order to be found consistent with Land Use Development Policy No. 4 (LUDP#4), the water demand of new discretionary development must be offset by long-term supplemental water supplies that do not result in further overdraft of the local groundwater basin and that are adequate to meet the project's net water demand as determined by the County considering | **Consistent.** The proposed Project would amend the LUDC to clarify that crop protection structures of any size (in general) that are 20 feet or less in height would be exempt from permits, and that permits would be required for structures that would be taller than 20 feet. Permits are not required to convert grazing lands or other uncultivated lands to cultivated agriculture. As |

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| appropriate reliability factors as determined by County Water Agency. | discussed in Section 4.4 of the EIR, irrigation water demand is unlikely to increase. Finally, the use of these agriculture support structures does not increase the demand for new farm employees, and therefore, would not result in a need for new roads, additional domestic water, or sewer services. |
| **Policy BIO-O-1:** Important natural resources in Orcutt, including sandhill chaparral, central dune scrub, wetlands, oak trees and woodland, Bishop pine forest, specimen trees, and central sage scrub shall be protected.<br><br>**Policy BIO-O-2:** Consistent with necessary flood control practices, natural stream channels and riparian vegetation in Orcutt shall be maintained in an undisturbed state in order to protect banks from erosion, enhance wildlife passageways.<br><br>**DevStd BIO-O-2.1:** Development shall include: a minimum setback of 50 feet from the outside edge of riparian vegetation or the top of creek bank (whichever is further) … ; hooding and directing lights away from the creek; drainage plans shall direct polluting drainage away from the creek or include appropriate filters; and erosion and sedimentation control plans shall be implemented during construction. | **Consistent.** In order for crop protection structures to be considered exempt from permits, crop protection structures must be consistent with the Comprehensive Plan. The proposed Project would be consistent with these biological resources protection policies by incorporating the feasible mitigation measures identified in Section 4.6 of the EIR and revised by the Board of Supervisors (Revision Document RV 01, dated March 12, 2019), into the ordinance amendment. These include (1) setback requirements from streams and creeks (50 feet), and (2) allowing the exemption only on lands that have been historically, intensively cultivated. The creek setback directly protects riparian vegetation and allows for the infiltration of some storm water runoff before it reaches a creek. In addition, as discussed in detail in Section 4.4 of the EIR, Ag Order 3.0 addresses these issues by requiring farm operators to manage runoff and water quality from cultivated fields and, therefore, reduce the amount of sediment or pollutants that could leave the site during rain events. Finally, the proposed Project does not allow lighting in crop protection structures. |
| **Policy VIS-O-1:** Significant scenic and visual natural resources in Orcutt shall be protected in order to preserve the semi-rural character of the OPA.<br><br>**Policy VIS-O-2**: Prominent public view corridors (U.S. 101, State Routes 1 & 135, Clark Ave., Santa Maria Way, and Union Valley Parkway) and public view sheds (Orcutt/Solomon Hills, Casmalia Hills, and Orcutt Creek) should be protected. | **Consistent.** Orcutt Community Plan development standards in support of these visual resources policies are focused on minimizing the permanent effects of new non-agricultural development.<br><br>The proposed Project would exempt crop protection structures of any size (in general) that are 20 feet or less in height and require permits for taller structures. At 20 feet or less, the height of exempt crop protection structures would be, in general, subordinate to landforms, would not intrude into the skyline, and would follow the natural contours of the land, as the furrows of cultivated fields typically follow the natural contours. These structures may be installed for several months to several years and may cover many acres of a farm at any one time because they are used to provide protection and enhance the production of agricultural crops. Depending on crop type and agricultural practices, the membranes covering the frames may be temporarily removed or rolled back reducing the visibility of the structures during certain times of the crop's growth and production cycle. |

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| **Santa Ynez Valley Community Plan** | |
| **GOAL LUA-SYV:** Protect and support agricultural land use and encourage appropriate agricultural expansion.<br><br>**Policy LUA-SYV-1:** The County shall develop and promote programs to preserve agriculture in the Santa Ynez Valley Planning Area.<br><br>**Policy LUA-SYV-2:** Land designated for agriculture within the Santa Ynez Valley shall be preserved and protected for agricultural use. | **Consistent.** The proposed Project would amend the LUDC to clarify that crop protection structures of any size (in general) that are 20 feet or less in height would be exempt from permits when also meeting other exemption criteria, and that permits would be required for such structures that would be taller than 20 feet. The Project would aid in the preservation of agriculture in the Santa Ynez Valley by allowing most farmers to respond quickly to market and climatic conditions in determining choice of crop and use of hoop and shade structures without incurring the time and expense needed to obtain permits. |
| **Policy BIO-SYV-1:** Environmentally sensitive biological resources and habitat areas shall be protected.<br><br>**Policy BIO-SYV-4:** Sensitive habitats shall be protected to the maximum extent possible … As listed in Action BIO-SYV-1.2, sensitive habitat types include: Riparian, Coastal and Valley Freshwater Marsh, Southern Vernal Pool, Valley Needlegrass Grassland, Coastal Scrub, Coast Live Oak Woodland, Valley Oak Woodland and Savanna, streams and creeks, and wetlands. In addition, federally designated critical habitat for threatened or endangered species shall also be considered to be sensitive habitat. Natural stream corridors (channels and riparian vegetation) shall be maintained in an undisturbed state to the maximum extent feasible in order to protect banks from erosion, enhance wildlife passageways and provide natural greenbelts. Setbacks shall be sufficient to allow and maintain natural stream channel processes (e.g., erosion, meanders).<br><br>**DevStd BIO-SYV-4.1:** Development shall include a minimum setback of 50 feet in the Urban and Inner-Rural areas, 100 feet in the Rural areas, and 200 feet from the Santa Ynez River, from the edge of riparian vegetation or the top of bank whichever is more protective.<br><br>**DevStd BIO-SYV-4.2:** Only fully shielded (full cutoff) night lighting shall be used near stream corridors. Light fixtures shall be directed away from the stream channel.<br><br>**DevStd BIO-SYV-4.5:** To protect Coastal and Valley Freshwater Marsh, Southern Vernal Pool, and other types of wetland habitats, land use development proposals shall include a minimum setback of 50 feet in the Urban and Inner-rural areas and 100 feet in the Rural areas.<br><br>**DevStd BIO-SYV-4.6:** To protect Valley Needlegrass Grassland, Coastal Scrub and oak woodland habitats, development shall include a minimum setback of 15 feet in the Urban and Inner-rural areas and 30 feet in the Rural | **Consistent.** In order for crop protection structures to be considered exempt from permits, crop protection structures must be consistent with the Comprehensive Plan. The proposed Project, as mitigated by MM-BIO-1, would limit the exemption for crop protection structures to agricultural lands that have been historically intensively cultivated, which would protect the environmentally sensitive biological resources and habitat areas identified by the Santa Ynez Valley Community Plan biological resources policies. In other locations, a permit would be required for new cultivation employing crop protection structures, which would allow policy consistency to be determined on a site-specific basis. With MM-BIO-3, as revised by the Board of Supervisors (Revision Document RV 01, dated March 12, 2019), the Project would protect watersheds, wildlife corridors, riparian habitat, and natural stream channels through the inclusion of setbacks from streams and creeks (50 feet). However, pursuant to LUDC Subsection 35.20.020.C, any land use and structure, including any exempt crop protection structures, must comply with applicable Comprehensive Plan policies and development standards, including community plan development standards such as DevStd BIO-SYV-4.1.<br><br>In addition, as discussed in Section 4.4 of the EIR, farm operators must also comply with Ag Order 3.0 to reduce the rate of flow, quantity, and quality of storm water runoff leaving a site. Combined, the standards of Ag Order 3.0 and the biological resources mitigation measures would minimize pollution of water quality, underground water basins, and areas adjacent to such waters. Finally, the proposed Project does not allow lighting in crop protection structures. |

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| areas.<br><br>**Policy BIO-SYV-5:** Pollution of the Santa Ynez River, streams and drainage channels, underground water basins and areas adjacent to such waters shall be minimized.<br><br>**Policy BIO-SYV-10:** Areas of one or more acres of central coastal scrub shall be preserved to the maximum extent feasible.<br><br>**Policy BIO-SYV-11:** Areas of chaparral shall be protected from development to the maximum extent feasible.<br><br>**Policy BIO-SYV-12:** Areas of native grasslands shall be preserved to the maximum extent feasible. | |
| **Policy HA-SYV-1:** Archaeological resources shall be protected and preserved to the maximum extent feasible.<br><br>**Policy HA-SYV-4:** Traditional cultural, historical, and spiritual properties of concern to the Santa Ynez Tribal Elders Council should be protected and preserved to the maximum extent feasible. | **Consistent.** As discussed in Section 7.4.2 of the EIR, the proposed Project would not have significant effects on cultural resources. Pursuant to PRC 21080.3.1, the County notified Native Americans, listed by the Native American Heritage Commission as requesting such notice, regarding the proposed Project and the commencement of environmental review. The County received no response from any of the notified individuals regarding any potential for the Project to impact cultural resources. Therefore, the proposed Project would be consistent with these policies. |
| **GOAL VIS-SYV-1:** Protect the Rural/Agricultural Character and Natural Features of the Planning Area, Including Mountain Views, Scenic Corridors and Buffers, Prominent Valley Viewsheds, and the Quality of the Nighttime Sky.<br><br>**Policy VIS-SYV-1:** Development of property should minimize impacts to open space views as seen from public roads and viewpoints and avoid destruction of significant visual resources.<br><br>**Policy VIS-SYV-2:** All plans for new or altered buildings and structures within the Design Control Overlay shall be reviewed by the County Board of Architectural Review.<br><br>**Policy VIS-SYV-3:** The night sky of the Santa Ynez Valley shall be protected from excessive and unnecessary light associated with new development and redevelopment. | **Consistent.** The proposed Project would exempt crop protection structures of any size (in general) that are 20 feet or less in height and require permits for taller structures. At 20 feet or less, the height of exempt crop protection structures would be, in general, subordinate to landforms, would not intrude into the skyline, and would follow the natural contours of the land, as the furrows of cultivated fields typically follow the natural contours. These structures may be installed for several months to several years and may cover many acres of a farm at any one time because they are used to provide protection and enhance the production of agricultural crops. Depending on crop type and agricultural practices, the membranes covering the frames may be temporarily removed or rolled back reducing the visibility of the structures during certain times of the crop's growth and production cycle as viewed from Scenic Highways, of which one traverses the Santa Ynez Valley (SR 154). Lighting is not allowed in hoop and shade structures; therefore, the project would be consistent with policies protecting the night sky from excessive light.<br><br>In addition, mitigation measure MM-VIS-3, as revised by Revision Document RV 01, dated March 12, 2019, would further minimize effects resulting from crop |

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| | protection structures as seen from public roadways or other areas of public use. This measure would limit the exemption for the use of crop protection structures to 4,000 square feet per lot located within the Santa Ynez Valley Community Plan area Design Control Overlay on lots that can be viewed from public roads or from areas of public use. If larger, a permit would be required to allow the crop protection structures unless the structures would not be visible from public roadways or other areas of public use. |
| **Toro Canyon Plan** | |
| **GOAL LUA-TC:** Protect and support agricultural land use and encourage appropriate agricultural expansion, while maintaining a balance with protection of coastal and natural resources and protection of public health and safety.<br><br>**Policy LUA-TC-1:** The County shall develop and promote programs to preserve agriculture in the Toro Canyon Plan Area.<br><br>**Policy LUA-TC-2:** Land designated for agriculture within Toro Canyon shall be preserved and protected for agricultural use. | **Consistent.** The proposed Project would amend the LUDC to clarify that crop protection structures of any size (in general) that are 20 feet or less in height would be exempt from permits when also meeting other exemption criteria, and that permits would be required for such structures that would be taller than 20 feet. The Project would aid in the preservation of agriculture in the Toro Canyon area by allowing most farmers to respond quickly to market and climatic conditions in determining choice of crop and use of hoop and shade structures without incurring the time and expense needed to obtain permits. |
| **Policy PS-TC-1:** (*NON-LCP*) Resource conservation and recovery shall be implemented to reduce solid waste generation and to divert the waste stream from area landfills to the maximum extent feasible. | **Consistent.** As discussed in detail in Section 4.5 of the EIR, the materials used in crop protection structures are recyclable, consisting of a steel frame and a plastic membrane cover. Steel is readily recyclable. The plastic materials are also recyclable; however, whether the plastics are recycled once their usefulness has reached an end (typically three years) depends on the recycling market for plastics. The major barrier to agricultural plastics recycling is the lack of a consistent recycling market for the plastics. Every effort continues to recycle plastics from current agricultural operations and these efforts would continue into the future; no more effective measures have been identified. |
| **Policy BIO-TC-1:** Environmentally Sensitive Habitat (ESH) areas shall be protected.<br><br>**Action BIO-TC-1.1:** The following biological resources and habitats … shall be presumed to be "environmentally sensitive," [inland habitats only]<br><br>• Southern Coast Live Oak Riparian forest corridors<br>• Streams and creeks<br>• Wetlands<br>• Coastal Sage Scrub<br>• Sensitive native flora<br>• Coast Live Oak forests | **Consistent.** In order for crop protection structures to be considered exempt from permits, crop protection structures must be consistent with the Comprehensive Plan. The proposed Project, as mitigated by MM-BIO-1, would limit the exemption for crop protection structures to agricultural lands that have been historically intensively cultivated, which would protect the ESH identified by the Toro Canyon Plan biological resources policies. In other locations, a permit would be required for new cultivation employing crop protection structures, which would allow policy consistency to be determined on a site-specific basis. With MM-BIO-3, as revised by the Board of Supervisors (Revision |

| Comprehensive Plan Policies | Consistency Analysis |
|---|---|
| • Scrub oak chaparral<br>• Native grassland<br>• Critical wildlife habitat/corridors<br><br>**DevStd BIO-TC-1.4:** (*INLAND*) Development shall be required to include the following buffer areas from the boundaries of Environmentally Sensitive Habitat:<br><br>• Southern Coast Live Oak Riparian Forest corridors - 100 feet in Rural areas and 50 feet in Urban, Inner-Rural areas, and EDRNs, as measured from the top of creek bank<br>• Coast Live Oak Forests - 25 feet from edge of canopy<br>• Native grassland, a minimum ¼ acre in size - 25 feet<br>• Coastal Sage – minimum 20 feet<br>• Scrub oak chaparral – 25 feet from edge of canopy<br>• Wetlands – minimum 100 feet<br><br>**Policy BIO-TC-11:** (*INLAND*) Natural stream channels shall be maintained in an undisturbed state to the maximum extent feasible in order to protect banks from erosion, enhance wildlife passageways.<br><br>**DevStd BIO-TC-12.1:** Development shall not interrupt major wildlife travel corridors. Typical wildlife corridors include oak riparian forest and other natural areas that provide connections between communities. | Document RV 01, dated March 12, 2019), the Project would protect watersheds, wildlife corridors, riparian habitat, and natural stream channels through the inclusion of setbacks from streams and creeks (50 feet). However, pursuant to LUDC Subsection 35.20.020.C, any land use and structure, including any exempt crop protection structures, must comply with applicable Comprehensive Plan policies and development standards, including community plan development standards such as DevStd BIO-TC-4.1. |
| **Policy WW-TC-2:** Pollution of surface, ground and ocean waters shall be avoided. Where avoidance is not feasible, pollution shall be minimized.<br><br>**Policy FLD-TC-2:** Short-term and long-term erosion associated with development shall be minimized. | **Consistent.** As mitigated by MM-BIO-3, as revised by the Board of Supervisors (Revision Document RV 01, dated March 12, 2019), the proposed Project would include standards that require crop protection structures to be setback from streams and creeks at least 50 feet. This allows for the infiltration of some storm water runoff before it reaches a creek. As discussed in Section 4.4 of the EIR, farm operators must comply with Ag Order 3.0 to reduce the rate of flow, quantity, quality of storm water runoff, and sediment leaving a site. Combined with revised MM-BIO-3, the standards of Ag Order 3.0 would minimize pollution of water quality, underground water basins, and areas adjacent to such waters. |
| **Policy HA-TC-1:** Archaeological resources shall be protected and preserved to the maximum extent feasible. | **Consistent.** As discussed in Section 7.4.2 of the EIR, the proposed Project would not have significant effects on cultural resources. Pursuant to PRC 21080.3.1, the County notified Native Americans, listed by the Native American Heritage Commission as requesting such notice, regarding the proposed Project and the commencement of environmental review. The County received no response from any of the notified individuals regarding any potential for the project to impact cultural resources. Therefore, the proposed |

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| | Project would be consistent with this policy. |
| **Policy VIS-TC-1:** Development shall be sited and designed to protect public views.<br><br>**Policy VIS-TC-2:** Development shall be sited and designed to be compatible with the rural and semi-rural character of the area, minimize impact on open space, and avoid destruction of significant natural resources. | **Consistent.** The intent of these policies is to address development of permanent structures. In certain circumstances, options for locating development are available. Crop protection structures differ because they are movable structures without foundations, walls, or other permanent structural elements that are installed over actively cultivated agricultural fields.<br><br>The proposed Project would exempt crop protection structures of any size (in general) that are 20 feet or less in height and require permits for taller structures. At 20 feet or less, the height of exempt crop protection structures would be, in general, subordinate to landforms, would not intrude into the skyline, and would follow the natural contours of the land, as the furrows of cultivated fields typically follow the natural contours. These structures may be installed for several months to several years and may cover many acres of a farm at any one time because they are used to provide protection and enhance the production of agricultural crops. Depending on crop type and agricultural practices, the membranes covering the frames may be temporarily removed or rolled back, reducing the visibility of the structures during certain times of the crop's growth and production cycle. |