



County of Santa Barbara Planning and Development

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TO: Board of Supervisors

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DATE: February 19, 2002

RE: **Revisions (RV 1) to the Proposed Final Program EIR (99-EIR-02): Finding that State CEQA Guidelines Section 15088.5(b) applies to the Carpinteria Valley Greenhouse Program: P&D case numbers 99-GP-007, 99-OA-005, 99-RZ-009**

INTRODUCTION

A Program Environmental Impact Report (99-EIR-02) was prepared for the Carpinteria Valley Greenhouse Program (Program) to assess potential impacts due to future cumulative greenhouse development upon coastal resources in the Carpinteria Valley. There have been subsequent changes to the Program as a result of public review and comments, and Board of Supervisor direction, including new or revised Coastal Land Use Plan policies and Coastal Zoning Ordinance amendments (Article II). This EIR revision document evaluates Program modifications recommended by the Planning Commission and Board of Supervisors. The EIR Revision also documents minor text changes, amplifications and clarifications to the original project description (99-EIR-02), environmental setting, and impact analysis as a result of decision-maker review and public comment (Appendix D).

CEQA Guidelines Section 15088.5 describes the circumstances under which a lead agency is required to recirculate an EIR when new information is added to the EIR after public notice is given of the availability of the draft EIR for public review, but before EIR certification. According to the Guidelines Section 15088.5(a), "information" can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of meaningful opportunity to comment on new substantial adverse project impacts or feasible mitigation measures or alternatives which the project proponent declines to adopt. Section 15088.5(b) states, "recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications to an adequate EIR".

EIR Revision Findings: It is the finding of the Board of Supervisors, that the proposed Final EIR (99-EIR-02), as herein amended by the attached EIR Revision analysis, may be used to fulfill the environmental review requirements for the Carpinteria Valley Greenhouse Program. None of the changes recommended by the Planning Commission or Board of Supervisors would result in any new significant environmental impacts nor would they result in a *substantial increase* in the severity (i.e. change in impact level classification) of any environmental impact originally analyzed in the Proposed Final EIR. Hence, pursuant to CEQA Guidelines Section 15088.5(b), the proposed revisions described in this document have not been recirculated. The proposed Final EIR for the Carpinteria Valley Greenhouse Program is hereby amended by this revision document, together identified as (99-EIR-02 RV1).

**REVISIONS (RV1) TO 99-EIR-02
FOR
CARPINTERIA VALLEY GREENHOUSE PROGRAM**

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BACKGROUND

Pursuant to CEQA Guidelines Section 15156, a Program EIR (99-EIR-02) was prepared for the Carpinteria Valley Greenhouse Program (case numbers 99-OA-005, 99-GP-007, 99-RZ-009, and 99-M-008). The proposed Final EIR was released in March 2000 and has not yet been certified.

The proposed Final EIR prepared for the project concluded that the Carpinteria Valley Greenhouse Program would result in significant unmitigable (Class I) impacts to the following resources: visual resources, land use and agriculture, and traffic. Significant but mitigable (Class II) impacts were identified in the following issue areas: visual resources, water quality, flooding and drainage, land use and agriculture, air quality, noise, and biological resources. Impacts to traffic, air quality, and noise were identified as adverse but less than significant (Class III). Significant and unavoidable (Class I) cumulative impacts were identified to visual resources (cumulative loss of open space, impacts to public view corridors, and changes to the rural character), water quality and groundwater, land use and agriculture (cumulative land use conflicts due to traffic, noise, agricultural practices, loss of privacy, and changes in visual character impacts), and biological resources (due to water quality impacts that could impact the Carpinteria Marsh ecosystem).

The Planning Commission considered the Carpinteria Valley Greenhouse Program during a series of public hearings (11/8/99, 1/19/00, 3/30/00, 6/7/00, 7/17/00, 8/16/00, 9/18/00, and 10/4/00). The Planning Commission hearings concluded with no recommendation to the Board of Supervisors. The two motions proposed by the Planning Commission each received split votes (2-2). The Board of Supervisors considered the Carpinteria Valley Greenhouse Program for several hearings (2/20/01, 3/19/01, 4/24/01, 8/13/01, 11/05/01, 12/03/01 and 2/19/02).

LOCATION

The Carpinteria Valley Greenhouse Program would apply to all agricultural parcels zoned AG-I-5, AG-I-10, AG-I-20, and AG-I-40 within the unincorporated portions of the coastal zone of the Carpinteria Valley (Article II) (Appendix A). The revised project would apply to the same parcels as the original project.

I. CHANGES TO THE PROJECT

The original Carpinteria Valley Greenhouse Program project description and ordinance amendments (proposed AG-I-CARP and AG-I-OF zone districts) are included in Section 2.0 and Appendix B of 99-EIR-02. On August 13, 2001, the Board directed staff to revise the Greenhouse Program based on the direction provided and consensus reached during the public hearing process. The Board of Supervisors' revised project is included as Appendix C of this revision document. The Board of Supervisor's revised Greenhouse Program includes the following changes to the project:

1. The revised project incorporates an overlay district (Carpinteria Agricultural (CA) Overlay District) as the primary tool for regulating greenhouse development in the Carpinteria Valley. The CA Overlay District retains the base zoning (Agriculture-I) in the study area and would be applied to all AG-I zoned parcels in the study area (the coastal zone of Carpinteria Valley). The overlay would regulate greenhouses and greenhouse related development, packing and shipping facilities, and shade structures and hoop structures in one of two sub-areas: "Area A" and "Area B". "Area A", located south of Highway 192, east of Nidever Road and west of Linden Avenue, allows future expansion of greenhouses, greenhouse related development, packing and shipping facilities, shade structures and hoop structures, on AG-I zoned lands as identified by the CA Overlay District map (Appendix A), subject to the provisions of this overlay district. "Area B" encompasses the remainder of AG-I zoned lands, as identified by the CA Overlay District map, and would limit new greenhouses, greenhouse related development, packing and shipping facilities, and hoop structures to less than 20,000 square feet of cumulative development per legal lot. "Area A" of the CA Overlay District would affect 88 parcels (664 acres). "Area B" includes the remaining 4,972 acres of AG-I designated lands in the study area. Any land use not related to greenhouse development and packing and shipping facilities would continue to be governed by the provisions of the AG-I zone district.

A primary difference between the overlay and the original project is that the overlay would not allow significant greenhouse development (e.g. 20,000 sq.ft. or greater cumulative per parcel) north of Highway 192 or east of Linden Avenue. Limiting major greenhouse development north and east of these roadways creates a defined, logical greenhouse expansion boundary that maintains development within and adjacent to historic clusters and preserves the rural character of the Valley. The geographic boundary of "Area A" most closely resembles the Low Buildout Alternative greenhouse expansion area (i.e., proposed AG-I-CARP parcels).

2. A development cap of 2.75 million square feet for new greenhouses and greenhouse related development, packing and shipping facilities, and hoop structures (excluding shade structures) would be applied to "Area A". Without the cap, approximately 8.6 million sq. ft. of additional greenhouse development could occur in "Area A" based solely on the ability to build out to the applied setback allowances and the 25% maximum lot coverage for view corridor parcels. This is nearly the same amount of greenhouse development that currently exists in "Area A" (9.1 million sq. ft.). The 2.75 million square foot development cap keeps future greenhouse development at an amount similar to that analyzed in the EIR for the two zone district original project description.

The CA Overlay District also eliminates maximum lot coverage requirements with the exception of designated view corridor parcels. The overlay relies on setbacks to maximize development on fewer parcels than would be possible with the existing maximum percent lot coverage. General setbacks include a 75-foot setback from public road rights-of-way, with 30-foot setbacks from side and rear lot lines (see Table 1 for additional setbacks required under special circumstances). The 2.75 million square feet development cap within "Area A" accommodates and promotes continued greenhouse expansion within available resources, protects natural resources, preserves the rural character of the

Carpinteria Valley and balances the needs of future residents of the community with the needs of the existing community. *(The program previously relied on lot coverage of 65-75% combined with the area of remaining developable agricultural lands in the proposed AG-I-CARP zone district to determine a maximum potential greenhouse development of 3.0 million square feet. Fifty-four parcels would have been zoned AG-I-CARP (the expansion zone district) affecting 462 acres of land.)*

3. The CA Overlay would allow potential greenhouse expansion in two areas previously proposed for AG-I-OF zoning (one contiguous block of open field agriculture halfway between Cravens Lane and Santa Monica Road and another between Cravens Lane and Nidever Road). These parcels are eligible under the CA Overlay to apply for greenhouse development under the 2.75 million-sq. ft. development cap. *(The program previously designated these parcels with AG-I-OF zoning, thus restricting greenhouses and related development to less than 20,000 sq. ft. cumulative per legal parcel.)*
4. The CA Overlay restricts greenhouses, greenhouse related development, packing and shipping facilities, shade and hoop structures, etc. on identified view corridor parcels to 25% maximum lot coverage, 25-ft. absolute building height (12 ft. for shade and hoop structures), and 250-ft. front setback from public right-of-way to minimize fragmentation of these large blocks of contiguous open field agriculture and to preserve, to the greatest extent feasible, important public view corridors.

Eight parcels within the block between Cravens Lane and Nidever Road and three parcels fronting Highway 192 (between Cravens Ln. and Santa Monica Rd.) have been identified as view corridor parcels. The Via Real agricultural block parcels were identified as such in the Proposed Final EIR (p. 5.1-18), and contain important public views of the mountains, ocean, open field agriculture, and open space, as seen from Via Real, U.S. Highway 101 and State Highway 192. Similarly, the three view corridor parcels fronting Highway 192 and the Cravens Lane/Santa Monica Road agricultural block contain important public views as seen from Highway 192. These two agricultural blocks/view corridors represent a vestige of open field agriculture in the central study area that has not yet been infringed upon by urban or greenhouse development. *(The program previously designated these parcels with AG-I-OF zoning, thus restricting greenhouses and related development to less than 20,000-sq. ft. cumulative per legal parcel. The western-most view corridor parcel fronting Highway 192 was previously designated AG-I-CARP allowing for greenhouse expansion.)*

5. In "Area A", a Development Plan (under the jurisdiction of the Planning Commission) in addition to a Coastal Development Permit is required for greenhouses, greenhouse related development, packing and shipping facilities, and shade structures and hoop structures of 20,000 sq. ft. or more (cumulative development). *(The program previously proposed that such development be subject to a Director-Approved Development Plan.)*

6. The Carpinteria Valley Greenhouse Program amends Article II, Section 35-169.2 (Coastal Development Permit) to allow shade structures 20,000 square feet or greater within the CA Overlay District with only a coastal development permit, rather than the current coastal zone requirement for approval of a development plan. Shade structures would be subject to all applicable CA Overlay District development standards (required for CDP's), Coastal Development Permit findings, and would be restricted to 25% lot coverage.

The maximum lot coverage requirement is consistent with the historic construction and use of shade structures as an accessory agricultural structure in the Carpinteria Valley. The Coastal Development Permit would also reduce the time and cost associated with the permit process. These changes recognize the value of shade structures in promoting crop flexibility, and their historic use in the Carpinteria Valley as an important accessory agricultural structure supporting both open field and greenhouse agriculture. *(The program previously required that shade structures of 20,000 sq. ft. or more be subject to a Development Plan in the proposed AG-I-CARP zone district. In the proposed AG-I-OF zone district, shade structures would be restricted to less than 20,000-sq. ft. cumulative per legal lot.)*

7. The CA Overlay permits packing and shipping facilities of 5,000 sq. ft. or more with a Minor Conditional Use Permit (Minor CUP). Facilities less than 5,000-sq. ft. may be processed with only a Coastal Development Permit provided there are no existing greenhouses or greenhouse related development on the lot. *(The program previously proposed that packing and shipping facilities be permitted with a Major CUP unless the facility is devoted primarily to the handling of products grown on the premises.)*
8. The CA Overlay clarifies language regarding conforming and nonconforming uses and structures. All legally permitted greenhouses and related development as of the effective date of ordinance adoption will be conforming *uses* in both Areas A and B. A structure is determined to be either a conforming or nonconforming *structure* based upon whether it complies with the provisions of the CA Overlay District (e.g. setbacks, height requirements, development standards, etc.).
9. The CA Overlay proposes definitions for greenhouse, greenhouse related development, shade structure and hoop structure. *(The program previously proposed definitions for greenhouse or hothouse, plant protection structure, shade structure, berry hoops, and temporary structure.)*
10. Since the CA Overlay District retains the base zone district (Agriculture-I), there is no longer a need to modify the County Uniform Rules for agricultural preserves, which implement the California Land Conservation Act of 1965, otherwise known as the Williamson Act. Therefore, case number 99-M-008 no longer applies to the project.
11. Most of the mitigation measures from the EIR have been incorporated into the CA Overlay District as submittal requirements, general requirements of the overlay, development standards, or have

been incorporated in Coastal Land Use Plan Policy 8-5. (*Refer to the project Findings to track specific mitigation measures.*)

SUMMARY

The main effect of the revised project description is a minor shift in the geographic location of the impacts identified in the proposed Final EIR. The original project description would have permitted limited greenhouse expansion north of Highway 192 and east of Casitas Pass Road (7 parcels, 75 acres). The revised project (overlay) would limit future greenhouse development primarily to CA Overlay District “Area A” within and adjacent to existing historic greenhouse clusters south of Highway 192 between Nidever Road and Linden Avenue. There is still substantial infill development possible in these areas, where incremental additions to existing development would not be as noticeable. “Area A” provides a logical greenhouse expansion boundary for the continuation of highly productive coastal agriculture opportunities, while preserving the scenic values and rural character of the Carpinteria Valley.

The CA Overlay “Area A” includes those parcels from the original project located south of Highway 192 between Nidever and Linden and identified as AG-I-CARP, plus an additional 41 parcels (277 acres) located south of Highway 192. These 41 parcels would have been rezoned to AG-I-OF and limited to less than 20,000 sq. ft. (cumulative) of greenhouse development under the original project. Of these 41, only 23 (234 acres) would be able to develop under the overlay, as the remainder of parcels are limited by existing development constraints (mostly residential uses on very small agriculture lots). While a greater number of parcels and more acreage would be eligible for greenhouse development, the CA Overlay District “Area A” would permit only 2.75 million sq. ft of new greenhouse development, an amount within the range of impacts analyzed in the original EIR. The EIR evaluated potential greenhouse buildout ranging from 2.2 million sq. ft. (Low Build), 3.0 million sq. ft (EIR Project Description), 4.3 million sq. ft. (High Build), and 4.5 million sq. ft. in the No Project Alternative. With the exception of shade structures, the overlay would limit greenhouse development in “Area B” to less than 20,000 sq. ft. of cumulative development per legal lot, similar to the AG-I-OF district proposed in the original project. Shade structures would be allowed up to 25% maximum net lot coverage. Cultivated agriculture in “Area B” would continue as in baseline (or existing) conditions. No new impacts would occur.

The Carpinteria Valley Greenhouse Program amends Article II, Section 35-169.2 (Coastal Development Permit) to allow shade structures 20,000 square feet or greater within the CA Overlay District with only a coastal development permit, rather than the current coastal zone requirement for approval of a development plan (see note below). Shade structures would be subject to all applicable CA Overlay District development standards (required for CDP’s), Coastal Development Permit findings, and would be restricted to 25% lot coverage. (*Note: Per Resolution 98-473, shade structures 20,000-sq.ft or greater cumulative per parcel in the Carpinteria Valley require a conditional use permit (CUP) until such time the Board of Supervisors and Coastal Commission agree on any changes resulting from the Carpinteria Valley Greenhouse Program.*)

The maximum lot coverage requirement is consistent with the historic construction and use of shade structures as an accessory agricultural structure in the Carpinteria Valley. The Coastal Development Permit would also reduce the time and cost associated with the permit process. These changes recognize the value of shade structures in promoting crop flexibility, and their historic use in the Carpinteria Valley as an important accessory agricultural structure supporting both open field and greenhouse agriculture.

By definition, shade structures consist of a frame with no permanent structural elements (e.g. footings, foundations, plumbing, electrical wiring, etc.), and an impermeable, removable covering used to protect plants grown in the soil or in containers upon the soil, with a maximum height of no greater than 12 feet above natural grade. These features contribute to shade structures having less of an overall impact when compared to greenhouses, greenhouse related development, hoop structures, and packing and shipping facilities, with respect to land use and related land use compatibility conflicts, noise, traffic, water quality, flooding and drainage, air quality, and visual impacts.

Additional changes to lot coverage, height and setback requirements and development standards have also been made during the public hearing process in order to provide greater clarity and to better meet the stated purpose of the Greenhouse Program. The ordinance changes are summarized below in Table 1 and the development standards in Appendix C (CA Overlay District text).

**Table 1
Proposed Amendments to Greenhouse Standards**

Original Project (2 zone districts)	Proposed Overlay	Comment
<p>Lot Coverage Maximum lot coverage shall include all greenhouse structures, parking, accessory buildings, and necessary retention basins where no development would be allowed within the remaining open space and setback areas. The maximum lot coverage shall be 75% for lots less than 5 acres, 70% for lots 5 to 9.99 acres, and 65% for lots 10 acres or more.</p>	<p>Lot Coverage lot coverage shall include all greenhouses, shade and hoop structures, and greenhouse related development, including accessory buildings, packing and shipping facilities, and associated paved driveways and parking areas.</p> <p>a. For parcels identified as view corridor parcels on the Carpinteria Agricultural Overlay District map, lot coverage shall not exceed 25% net lot coverage. Development shall be clustered adjacent to existing greenhouse development to the greatest extent feasible.</p>	<p>Lot coverage requirements shall not apply to AG-I zoned parcels within the CA Overlay except for those identified as view corridor parcels. Lot coverage is eliminated to maximize clustering of greenhouses and all related development on individual lots, which may decrease pressure to convert (and fragment) open field agriculture to greenhouse agriculture. View corridor parcels have a 25% maximum lot coverage with clustering next to existing adjacent greenhouse development in order to protect public view corridors and limit fragmentation of large, contiguous blocks of open field agricultural land.</p>
<p>Height The maximum height of any greenhouse or accessory structure shall be no greater than thirty (30) feet above finished grade. The maximum height of any temporary</p>	<p>Height</p> <p>a. The maximum absolute height of any greenhouse or greenhouse related development, including packing and shipping facilities,</p>	<p>Maximum absolute heights for greenhouses and related development were lowered on view corridor parcels to minimize impacts to public views. Additional height</p>

Original Project (2 zone districts)	Proposed Overlay	Comment
<p>structure shall be no greater than sixteen (16) feet above finished grade.</p>	<p>shall be no greater than thirty (30) feet above finished grade. The maximum absolute height of any shade structure or hoop structure shall be no greater than twelve (12) feet above natural grade.</p> <p>b. Within view corridors the maximum absolute height of any greenhouse or greenhouse related development, including packing and shipping facilities, shall be no greater than twenty-five (25) feet above finished grade.</p>	<p>limits applied to shade and hoop structures (per Article II definitions) provide similar benefits.</p>
<p>Setbacks The following setbacks shall be required from all new development:</p> <p><i>Front:</i> Fifty (50) feet from the centerline and thirty (30) feet from the right of way line of any street.</p> <p><i>Side and Rear:</i> Thirty (30) feet from the lot lines on which the building or structure is located.</p> <p><i>Interior:</i> Refer to Division 7 Sec. 35-126.3 (GEN REGS-Odd-Shaped Lots) for interior lot setbacks.</p> <p>In addition, no structure shall be located within fifty (50) feet of any residentially zoned lot or any adjacent lot with an approved residential use within fifty (50) feet of the subject parcel.</p>	<p>Setbacks The following setbacks for greenhouses and related structures shall apply:</p> <p>a. <i>Front:</i> Seventy-five (75) feet from the right of way line of any street. For parcels within identified view corridors, the front setback shall be at least two hundred fifty (250) feet from right of way.</p> <p>b. <i>Side and Rear:</i> Thirty (30) feet from the lot lines on which the building or structure is located.</p> <p>c. <i>Interior Lot:</i> Twenty (20) feet from the lot lines on which the building or structure is located.</p> <p>d. One hundred (100) feet from a residentially-zoned lot or fifty (50) feet from an adjacent parcel where there is an approved residential dwelling located within fifty (50) feet of the parcel boundary.</p> <p>e. One hundred (100) feet from top-of-bank or edge of riparian habitat of natural creek channels, whichever is greater.</p>	<p>The setback from road rights of way has been modified to make available additional land for landscape screening purposes and aid in lessening the visual impact that such large, tall structures have upon public views.</p> <p>Increased setbacks adjacent to residential uses serve to aid in the reduction of land use conflicts between residential and agricultural uses.</p>

II. CHANGES IN ENVIRONMENTAL EFFECTS

The proposed changes do not result in new significant impacts, nor have any Class II or III impacts become Class I (significant and unmitigable) or Class I impacts become more severe. The following sections assess the potential change in environmental effects for each topical issue analyzed in the proposed Final EIR. For the purposes of this discussion, “greenhouse development” refers to all greenhouses, packing and shipping facilities, shade and hoop structures and other related development (including paved areas and accessory structures), unless expressly stated otherwise.

The following discussion focuses on the impacts that could occur at buildout of the revised program (2.75 million square feet in “Area A”, the greenhouse expansion area). “Area B”, retains the provisions of the existing AG-I zone district except for greenhouse development (excluding shade structures) of 20,000 sf or more. The conversion of land to open field and orchard agriculture and the construction of less than 20,000 sf of greenhouse development per legal lot are permitted under the existing zone district, as well as the proposed overlay. As stated in Section 3.0 of the Revised Final EIR, most land that is suitable for greenhouse cultivation has already been converted to agriculture. Eliminating the *opportunity* to construct greenhouses on slopes greater than 5% will not create an incentive to bring more natural lands into cultivation, as greenhouse development would not have occurred on these slopes anyway. Furthermore, conversion of natural lands to open field and orchard cultivation could occur irrespective of the proposed project. These zone district provisions and the impacts associated with their continuation are a part of the environmental baseline and will continue whether or not the project is approved.

In the overlay, shade structures would be allowed up to 25% maximum net lot coverage. Historically, these structures have been used as accessories to open field cultivation and nursery operations and rarely exceed 25% lot coverage. Under the existing AG-I zone district, these structures can be built to a maximum 65-75% lot coverage, depending on parcel size, with a Development Plan and Conditional Use Permit. By definition, shade structures consist of a simple frame with no permanent structural elements and have a dark, permeable, removable covering and a maximum height of 12 feet. Few impacts are associated with shade structure due to the low height (does not intrude into skyline), the dark covering (no glare), and the permeable aspect of the covering, which allows rain to percolate through the covering onto the ground below. As they are subject to a Coastal Development Permit under the proposed overlay, they will be subject to all development standards, where applicable. The provisions regarding shade structures are somewhat more restrictive (i.e. 25% maximum net lot coverage and development standards) than those in the existing zone district (the environmental baseline).

Therefore, there are no reasonably foreseeable significant impacts associated with future shade structure and greenhouse development in proposed “Area B” and only limited discussion is warranted in this analysis.

5.1 Visual Resources

99-EIR-02 identifies impacts to public viewsheds and loss of open space (Impact VIS-1) and the potential to result in significant light and glare impacts (Impact VIS-2) at buildout of the Greenhouse Program. The main consequence of the revised project (overlay) is a shift in the geographic location of the visual resource impacts identified in the proposed Final EIR; thus, the magnitude of visual resource impacts could increase slightly in some areas (“Area A”) while decreasing in others (“Area B”).

The revised project (overlay) would limit future greenhouse development primarily to CA Overlay District “Area A” within and adjacent to existing historic greenhouse clusters, south of Highway 192 between Nidever Road and Linden Avenue. The CA Overlay “Area A” includes those parcels from the original project located south of Highway 192 between Nidever Road and Linden Avenue identified as AG-I-CARP, plus an additional 41 parcels (277 acres) located south of Highway 192 that would have been rezoned to AG-I-OF. These 41 parcels were limited to less than 20,000 sq. ft. of greenhouse development under the original project. Of these 41 parcels, only 23 (234 acres) would be able to develop under the overlay, as the remainder of parcels are limited by existing development constraints. While a greater number of parcels and more acreage are eligible to apply for greenhouse development in the CA Overlay District “Area A”, actual buildout would be regulated by the 2.75 million square foot development cap. The overlay would limit greenhouse development (excluding shade structures) in “Area B” to less than 20,000 square feet of cumulative greenhouse development per legal lot, similar to the AG-I-OF district proposed in the original project. However, shade structures could be developed up to 25% net lot coverage. Cultivated agriculture in “Area B” would continue as in baseline (or existing) conditions. No changes in impacts would occur in “Area B”.

The CA Overlay District focuses on infill development of historic greenhouse parcels, similar to the original project. The main difference is the inclusion of the two large blocks of contiguous open field and orchard agriculture between Nidever Road and Cravens Lane, and between Cravens Lane and Santa Monica Road. Under the original project these areas would have been designated AG-I-OF and would not have been eligible to develop more than 20,000 square feet of greenhouse development. Under the CA Overlay, these parcels are now eligible to apply for greenhouse development under the 2.75 million square foot development cap.

As discussed in the Proposed Final EIR (p. 5.1-18) these productive open field agricultural blocks also function as significant open space and view corridors. Views of the corridor between Nidever and Cravens from Highway 101 and Via Real include foreground and middle-ground views of open field agriculture and background views of the foothills and Santa Ynez Mountains. The eastern and western perimeter of this corridor is lined with greenhouses that are highly visible to travelers on Highway 101 and Via Real. Views from Highway 192 include foreground and middle-ground views of orchards and open field agriculture, with occasional background views of the Pacific Ocean. The corridor between Cravens and Santa Monica has foreground views that are somewhat obstructed by existing development; however, the middle and background views provide a sense of openness since the skyline is not interrupted with greenhouse roof peaks and building masses. Development on these parcels could

result in significant visual impacts to public views and lead to a change in the rural character due to a loss of open space.

In general, increased setbacks, reduced heights, and more restrictive lot coverage would balance new greenhouse development with the protection of view corridors and open space. On parcels designated as view corridor parcels (Appendix B) these requirements would include a 25% lot coverage restriction, an absolute height of 25 feet on all greenhouse development, and a setback from public rights-of-way of 250 feet. On the remaining (non-view corridor) parcels the setback from public rights-of-way is proposed at 75 feet in order to provide adequate landscape screening while shade and hoop structures cannot be taller than 12 feet on *all* parcels (reduced from 16). These modified development criteria better address the potential impacts of greenhouse development to visual resources.

The elimination of lot coverage requirements, combined with setbacks of 75 feet from public rights-of-way and 30-foot setbacks from side and rear lot lines, enables buildout of the development cap on fewer parcels in “Area A”, which limits piecemeal greenhouse expansion and fragmentation of open field agricultural lands. The setbacks provide additional area for landscape screening and visual relief from building masses along public view corridors. In “Area B”, nonconforming structure regulations would allow reconstruction of greenhouse development provided that it meets the requirements of the CA Overlay. Thus, rebuilt greenhouses would need to conform to the setbacks and landscape requirements, which would further aid in addressing impacts of greenhouse development to visual resources.

Overall, “Area A” of the CA Overlay District creates a defined, logical greenhouse expansion boundary that maintains development within and adjacent to historic clusters, preserves the rural character of the Valley and limits structural development north of Highway 192. However, introduction of greenhouse development of 2.75 million-sq. ft. would continue to impact public viewsheds and loss of open space and result in significant light and glare impacts, similar to the original project.

Residual Impacts

With implementation of proposed mitigation measures VIS-1 through VIS-9, residual Impact VIS-1 would remain significant and unavoidable (Class I) and residual Impact VIS-2 would remain significant but mitigable (Class II).

5.2 Water Quality and Groundwater

99-EIR-02 identifies impacts to surface water quality and groundwater quality through the discharge of irrigation and surface runoff water containing fertilizers and other agricultural chemicals (Impact W-1), surface water quality through elevated storm water runoff pollutants (Impact W-2), and surface water quality due to sedimentation resulting from construction/reconstruction activities (Impact W-3). The main consequence of the revised project (overlay) is a shift in the geographic location of the water quality and groundwater impacts identified in the proposed Final EIR.

The revised project (overlay) would limit future greenhouse development primarily to CA Overlay District “Area A” within and adjacent to existing historic greenhouse clusters, south of Highway 192 between Nidever Road and Linden Avenue. The CA Overlay “Area A” includes those parcels from the original project located south of Highway 192 between Nidever Road and Linden Avenue identified as AG-I-CARP, plus an additional 41 parcels (277 acres) located south of Highway 192 that would have been rezoned to AG-I-OF. These 41 parcels were limited to less than 20,000 sq. ft. of greenhouse development under the original project. Of these 41 parcels, only 23 (234 acres) would be able to develop under the overlay, as the remainder of parcels are limited by existing development constraints. While a greater number of parcels and more acreage are eligible to apply for greenhouse development in the CA Overlay District “Area A”, actual buildout would be regulated by a 2.75 million sq. ft. development cap. The overlay would limit greenhouse development (excluding shade structures) in “Area B” to less than 20,000 sq. ft. of cumulative development per legal lot, similar to the AG-I-OF district proposed in the original project. However, shade structures could be developed up to 25% net lot coverage. Cultivated agriculture in “Area B” would continue as in baseline (or existing) conditions. No changes in impacts would occur in “Area B”.

Greenhouse development would be focused south of Highway 192 within the watersheds of Arroyo Paredon, Drainage E and Santa Monica Creek, with a slight decrease in development in the Franklin Creek watershed. Mitigation measures revised to address water quality impacts under the original project description have been incorporated as CA Overlay District development standards (see Appendix C) and Coastal Land Use Plan policies. Overall impacts to surface water quality would be slightly less due to a 250,000-sq. ft. reduction in potential buildout. This reduction would incrementally reduce the discharge of nutrient-rich surface water to the local creek system and to the Carpinteria Salt Marsh, and would provide a slight decrease in overall sedimentation impacts due to construction activities.

Groundwater consumption would be similar to the original project because greenhouse-related water demand would remain approximately the same. The potential increase in water use at buildout of the CA Overlay would be 151 acre-feet/year (AFY) ($2.4 \text{ AFY/acre} \times 63 \text{ acres} = 151 \text{ AFY}$). While a substantial amount of water, it is less than the increase that would occur under the original project (168 AFY) and would not represent a significant impact, as the basin would remain in a state of surplus. The restriction of future greenhouse expansion to south of Highway 192 between Nidever Road and Linden Avenue places most of this potential development over the confined water table and outside of the groundwater recharge area, further reducing any potential impacts to the groundwater basin pumped by the Carpinteria Valley Water District.

The CA Overlay incorporates the following new development standard that was not previously evaluated as part of the EIR:

Development Standard #21: Irrigation Water Detention System: If deemed necessary by Planning and Development, in consultation with the Regional Water Quality Control

Board, to further reduce potential water quality impacts, all excess surface irrigation process water shall be collected and routed to a sealed bottom, irrigation water detention basin. The detention basin shall function as a water bank during low rainfall periods (i.e. May to November) for water conservation and reuse. The irrigation water detention basin shall be separate from and not connected to any required flood control retention basin. The irrigation water detention basin shall be designed in accordance with Santa Barbara County Flood Control and Water Conservation District requirements.

The development standard is optional (“if deemed necessary”) and clarifies the cooperative roles of the Regional Water Quality Control Board and Planning and Development in water quality protection and regulation. No new impacts are associated with the inclusion of this development standard.

Residual Impacts

Greenhouse development would be focused south of Highway 192 within the watersheds of Arroyo Paredon, Drainage E and Santa Monica Creek, with a slight decrease in development in the Franklin Creek watershed. Mitigation measures revised to address water quality impacts under the original project description have been incorporated as CA Overlay District development standards (see Appendix C) and Coastal Land Use Plan policies. Overall impacts to surface water quality would be slightly less due to a 250,000-sq. ft. reduction in potential buildout. This reduction would incrementally reduce the discharge of nutrient-rich surface water to the local creek system and to the Carpinteria Salt Marsh, and would provide a slight decrease in overall sedimentation impacts due to construction activities.

The new development standard further mitigates impacts to water quality but does not change impact classifications. Residual Impacts W-1 through W-3 would remain significant but mitigable (Class II).

5.3 Flooding and Drainage

99-EIR-02 identifies impacts to off-site flooding and drainage (Impact F&D-1), to flooding and erosion on-site and to neighboring properties (Impact F&D-2), and to greenhouses themselves from flooding if they are built in the 100-year floodplain (Impact F&D-3). The main consequence of the revised project (overlay) is a shift in the geographic location of the flooding and drainage impacts identified in the proposed Final EIR.

The revised project (overlay) would limit future greenhouse development primarily to CA Overlay District “Area A” within and adjacent to existing historic greenhouse clusters, south of Highway 192 between Nidever Road and Linden Avenue. The CA Overlay “Area A” includes those parcels from the original project located south of Highway 192 between Nidever Road and Linden Avenue identified as AG-I-CARP, plus an additional 41 parcels (277 acres) located south of Highway 192 that would have been rezoned to AG-I-OF. These 41 parcels were limited to less than 20,000 sq. ft. of greenhouse development under the original project. Of these 41 parcels, only 23 (234 acres) would be able to

develop under the overlay, as the remainder of parcels are limited by existing development constraints. While a greater number of parcels and more acreage are eligible to apply for greenhouse development in the CA Overlay District “Area A”, actual buildout would be regulated by a 2.75 million sq. ft. development cap. The overlay would limit greenhouse development (excluding shade structures) in “Area B” to less than 20,000 sq. ft. of cumulative development per legal lot, similar to the AG-I-OF district proposed in the original project. Shade structures could be developed up to 25% net lot coverage, however, they would not contribute to potential flooding and drainage impacts due to the permeable nature of the structure. Cultivated agriculture in “Area B” would continue as in baseline (or existing) conditions. Flooding and drainage impacts would be slightly less in “Area B”.

Potential impacts to flooding and drainage would be concentrated along the lower reaches of Arroyo Paredon, Drainage E, and Santa Monica Creek. However, the 2.75 million sq. ft. development cap would keep impacts below what could be experienced at buildout of the original project.

Residual Impacts

With the implementation of the proposed mitigation measures for the original project, residual Impacts F&D-1 through F&D-3 would remain significant but mitigable (Class II).

5.4 Land Use and Agriculture

99-EIR-02 identifies impacts to land use by creating conflicts with adjacent residential uses (Impact LU/AG-1), by placing permanent structures and pavement upon open field prime agricultural soils (Impact LU/AG-2), and potentially result in physical changes to the environment that could interfere with or disrupt existing agricultural operations that are located in the project study area (Impact LU/AG-3). The main consequence of the revised project (overlay) is a shift in the geographic location of the land use impacts identified in the proposed Final EIR; thus, the magnitude of land use and agriculture impacts could increase slightly in some areas (“Area A”) while decreasing in others (“Area B”).

The revised project (overlay) would limit future greenhouse development primarily to CA Overlay District “Area A” within and adjacent to existing historic greenhouse clusters, south of Highway 192 between Nidever Road and Linden Avenue. The CA Overlay “Area A” includes those parcels from the original project located south of Highway 192 between Nidever Road and Linden Avenue identified as AG-I-CARP, plus an additional 41 parcels (277 acres) located south of Highway 192 that would have been rezoned to AG-I-OF. These 41 parcels were limited to less than 20,000 sq. ft. of greenhouse development under the original project. Of these 41 parcels, only 23 (234 acres) would be able to develop under the overlay, as the remainder of parcels are limited by existing development constraints. While a greater number of parcels and more acreage are eligible to apply for greenhouse development in the CA Overlay District “Area A”, actual buildout would be regulated by a 2.75 million sq. ft. development cap. The overlay would limit greenhouse development (excluding shade structures) in “Area B” to less than 20,000 sq. ft. of cumulative development per legal lot, similar to the AG-I-OF district proposed in the original project. However, shade structures could be developed up to 25% net

lot coverage. Cultivated agriculture in “Area B” would continue as in baseline (or existing) conditions. No change in impacts would occur in “Area B”.

The CA Overlay District focuses on infill development of historic greenhouse parcels, similar to the original project. The main difference is the inclusion in the greenhouse expansion area of the two large blocks of contiguous open field and orchard agriculture between Nidever Road and Cravens Lane, and between Cravens Lane and Santa Monica Road. Under the original project these areas would have been designated AG-I-OF and would not have been eligible to develop more than 20,000 sq. ft. of greenhouse development. Under the CA Overlay, these parcels are now eligible to apply for greenhouse development under the 2.75 million sq. ft. development cap. These blocks also function as open space and view corridors as seen from Via Real, U.S. Highway 101, and State Highway 192.

The CA Overlay could potentially allow a greater concentration of greenhouse development adjacent to residential development located in the northwest part of the City of Carpinteria. This could create the potential for increased land use conflicts although the impact classification (already identified as Class I, significant and unavoidable) would not change, nor would there be a substantial change in the severity of the impact. Such conflicts include visual, noise, and local traffic nuisances. In general, the proposed setbacks, reduced heights, and lot coverage on identified view corridor parcels would balance new greenhouse development. No new mitigation measures have been identified or are required.

Specifically, the Overlay proposes that the setback from adjacent residential development be 100 feet or 50 feet from where there is a legal residence within 50 feet of the parcel boundary (e.g. from a residence on an adjacent agricultural parcel). The setback from the right-of-way of public roads is proposed for 75 feet to provide a greater visual buffer and more area with which to provide adequate landscape screening. Additional land use conflicts (visual resources, traffic, and noise) remain similar as described in the proposed Final EIR and in the relevant sections of this revision document.

Compared to the original project, the CA Overlay District focuses greenhouse development away from the prime soils situated north of Highway 192 and East of Casitas Pass Road (see Figure 5.4-1 in Final EIR). “Area A” of the overlay (the locus of future greenhouse development) contains a lesser proportion of prime soils than does the original project. Additionally, the 2.75 million sq. ft. development cap in “Area A” reduces the maximum greenhouse development potential by 250,000 sq. ft. Together, these changes would reduce the amount of permanent development placed on prime soils. The potential for new greenhouse development to fragment large contiguous blocks of existing open field agricultural land would be reduced in “Area B”. The elimination of a lot coverage maximum in “Area A” should maximize the clustering of greenhouse development on fewer parcels, also reducing the overall fragmentation of open field agriculture. The open field agricultural block between Cravens Lane and Santa Monica Road will likely transition to a mix of new greenhouse development complimented by smaller open field agricultural operations and, to a lesser extent, in the block between Nidever Road and Cravens Lane due to view corridor restrictions (25% maximum lot coverage).

Overall, “Area A” of the CA Overlay District creates a defined, logical greenhouse expansion area that maintains development within and adjacent to historic clusters, preserves the rural character of the Valley and limits structural development north of Highway 192. However, the introduction of greenhouses and/or related development of 2.75 million sq. ft. would continue to impact land use.

Residual Impacts

Residual Impact LU/AG-1 would remain significant and unavoidable (Class I). Residual Impact LU/AG-2 would remain significant but mitigable (Class II). Residual Impact LU/AG-3 would remain less than significant (Class III).

5.5 Traffic

99-EIR-02 identifies the following impacts to traffic: the addition of 822 average daily trips to project area roadways (Impact T-1), the addition of 91 A.M. and 183 P.M. peak hour trips (Impact T-2), exposure of persons and property to potentially significant traffic safety impacts along area roadways and intersections (Impact T-3), the generation of large trucks on area roadways, which may necessitate additional structural improvements (Impact T-4), and impacts to the Congestion Management Plan (Impact T-5).

The revised project (overlay) would limit future greenhouse development primarily to CA Overlay District “Area A” within and adjacent to existing historic greenhouse clusters, south of Highway 192 between Nidever Road and Linden Avenue. The CA Overlay “Area A” includes those parcels from the original project located south of Highway 192 between Nidever Road and Linden Avenue identified as AG-I-CARP, plus an additional 41 parcels (277 acres) located south of Highway 192 that would have been rezoned to AG-I-OF. These 41 parcels were limited to less than 20,000 sq. ft. of greenhouse development under the original project. Of these 41 parcels, only 23 (234 acres) would be able to develop under the overlay, as the remainder of parcels are limited by existing development constraints. While a greater number of parcels and more acreage are eligible to apply for greenhouse development in the CA Overlay District “Area A”, actual buildout would be regulated by a 2.75 million sq. ft. development cap. The overlay would limit greenhouse development (excluding shade structures) in “Area B” to less than 20,000 sq. ft. of cumulative development per legal lot, similar to the AG-I-OF district proposed in the original project. However, shade structures could be developed up to 25% net lot coverage. Cultivated agriculture in “Area B” would continue as in baseline (or existing) conditions.

Buildout of 2.75 million sq. ft. of greenhouse development would generate 743 ADT, 83 A.M. PHT and 165 P.M. PHT. This is a 79 fewer ADT, 8 fewer A.M. PHT and 18 fewer P.M. PHT than the original project. This represents about a 10% reduction in overall traffic generated in the program study area. Most of the traffic reductions associated with the overlay would occur on Casitas Pass Road due to the reduction of potential greenhouse development in “Area B”. These overall reductions would be offset by minor increases in traffic at the Santa Monica/Via Real/U.S. 101 NB ramp, the Linden/U.S.

101 SB ramp, and the Highway 192/Cravens Lane intersection, which has a statistically significant, above normal collision rate. Overall, traffic impacts would be similar to the original project.

Residual Impacts

Residual Impacts T-1 would remain adverse but less than significant as the revised project (overlay) would generate 743 ADT, which would not impact roadway capacities. Although the revised project would generate fewer A.M. and P.M. PHT (83 and 165, respectively), the Santa Monica/Via Real/U.S. 101 NB interchange and the Linden/U.S. 101 SB interchange would still receive peak hour contributions to congestion from the greenhouse project. Therefore, residual Impacts T-2 would remain significant and unavoidable (Class I). Residual Impact T-3 would remain significant and unavoidable (Class I). Residual Impacts T-4, and T-5 would remain adverse but less than significant (Class III).

5.6 Air Quality

99-EIR-02 identifies two impacts to air quality: that greenhouse construction would result in temporary emissions of air pollutants (Impact AQ-1) and that buildout of the program would increase ozone precursor emissions (Impact AQ-2).

The revised project (overlay) would limit future greenhouse development primarily to CA Overlay District “Area A” within and adjacent to existing historic greenhouse clusters, south of Highway 192 between Nidever Road and Linden Avenue. The CA Overlay “Area A” includes those parcels from the original project located south of Highway 192 between Nidever Road and Linden Avenue identified as AG-I-CARP, plus an additional 41 parcels (277 acres) located south of Highway 192 that would have been rezoned to AG-I-OF. These 41 parcels were limited to less than 20,000 sq. ft. of greenhouse development under the original project. Of these 41 parcels, only 23 (234 acres) would be able to develop under the overlay, as the remainder of parcels are limited by existing development constraints. While a greater number of parcels and more acreage are eligible to apply for greenhouse development in the CA Overlay District “Area A”, actual buildout would be regulated by a 2.75 million sq. ft. development cap. The overlay would limit greenhouse development (excluding shade structures) in “Area B” to less than 20,000 sq. ft. of cumulative development per legal lot, similar to the AG-I-OF district proposed in the original project. However, shade structures could be developed up to 25% net lot coverage. Cultivated agriculture in “Area B” would continue as in baseline (or existing) conditions.

Residual Impacts

Residual Impact AQ-1 would remain significant but mitigable (Class II) as the 250,000 sq. ft. reduction in greenhouse construction would have only marginal decreases in pollutant emissions, including fugitive dust. At buildout, the CA Overlay District would generate just 10% fewer vehicle trips than the original project. Therefore, there would be a similar reduction in mobile source air pollutant emissions. Residual Impact AQ-2 would remain adverse but less than significant (Class III).

5.7 Noise

99-EIR-02 identifies impacts to noise through short-term construction (Impact N-1), nuisance noise generation by operation of fans and heaters and idling of refrigerated trucks (Impact N-2), and traffic-related noise on area roadways (Impact N-3).

The revised project (overlay) would limit future greenhouse development primarily to CA Overlay District “Area A” within and adjacent to existing historic greenhouse clusters, south of Highway 192 between Nidever Road and Linden Avenue. The CA Overlay “Area A” includes those parcels from the original project located south of Highway 192 between Nidever Road and Linden Avenue identified as AG-I-CARP, plus an additional 41 parcels (277 acres) located south of Highway 192 that would have been rezoned to AG-I-OF. These 41 parcels were limited to less than 20,000 sq. ft. of greenhouse development under the original project. Of these 41 parcels, only 23 (234 acres) would be able to develop under the overlay, as the remainder of parcels are limited by existing development constraints. While a greater number of parcels and more acreage are eligible to apply for greenhouse development in the CA Overlay District “Area A”, actual buildout would be regulated by a 2.75 million sq. ft. development cap. The overlay would limit greenhouse development (excluding shade structures) in “Area B” to less than 20,000 sq. ft. of cumulative development per legal lot, similar to the AG-I-OF district proposed in the original project. However, shade structures could be developed up to 25% net lot coverage. Cultivated agriculture in “Area B” would continue as in baseline (or existing) conditions.

Construction noise would still occur at locations near residential land uses under the overlay and therefore the potential for significant construction noise impacts remains the same.

The CA Overlay could allow a slight increase in the concentration of greenhouse development adjacent to residential development located in the northwest part of the City of Carpinteria. The CA Overlay proposes that the setback from adjacent residential development be 100 ft. In addition, mitigation measures in the Proposed Final EIR that address noise impacts have been incorporated as development standards in the overlay.

Because of the relatively low numbers of vehicle trip generated with greenhouse development, buildout under the CA Overlay would have no significant effect on the current traffic noise levels in the area.

Residual Impacts

Residual Impacts N-1 and N-2 would remain significant but mitigable (Class II). Residual Impact N-3 would remain adverse but less than significant (Class III).

5.8 Biological Resources

99-EIR-02 identifies the following impacts to biological resources: increased input of silt and sediment to the Carpinteria Marsh may impact aquatic biological resources (Impact B-1), increase inputs of nutrients or pesticides may impact the aquatic biological resources of the Carpinteria Marsh (Impact B-2), pollutants in storm water runoff from uses accessory to greenhouses may cumulatively impact aquatic biological resources of the Carpinteria Marsh (Impact B-3), the change in temporal runoff and/or seasonal flow may impact the aquatic biological resources (Impact B-4), conversion of open field/orchards to greenhouses may reduce habitat for foraging and residence for terrestrial species (Impact B-5), and indirect impacts due to interruption of wildlife corridors or habitat linkages (Impact B-6).

The revised project (overlay) would limit future greenhouse development primarily to CA Overlay District "Area A" within and adjacent to existing historic greenhouse clusters, south of Highway 192 between Nidever Road and Linden Avenue. The CA Overlay "Area A" includes those parcels from the original project located south of Highway 192 between Nidever Road and Linden Avenue identified as AG-I-CARP, plus an additional 41 parcels (277 acres) located south of Highway 192 that would have been rezoned to AG-I-OF. These 41 parcels were limited to less than 20,000 sq. ft. of greenhouse development under the original project. Of these 41 parcels, only 23 (234 acres) would be able to develop under the overlay, as the remainder of parcels are limited by existing development constraints. While a greater number of parcels and more acreage are eligible to apply for greenhouse development in the CA Overlay District "Area A", actual buildout would be regulated by a 2.75 million sq. ft. development cap. The overlay would limit greenhouse development (excluding shade structures) in "Area B" to less than 20,000 sq. ft. of cumulative development per legal lot, similar to the AG-I-OF district proposed in the original project. However, shade structures could be developed up to 25% net lot coverage. Cultivated agriculture in "Area B" would continue as in baseline (or existing) conditions.

Impacts to biological resources would be similar to the original project, as development is slightly less (250,000 sq. ft.) than was analyzed in the proposed Final EIR; however, impacts to terrestrial habitats would be concentrated in "Area A", south of Highway 192 (Impacts B-5 and B-6) with a corresponding decrease in impacts in "Area B". The majority of impacts would continue to be primarily to aquatic species that inhabit both streams and the Carpinteria Salt Marsh due to degradation of water quality. To be consistent with existing Coastal Land Use Plan policy (Policy 9-37), the CA Overlay proposes a setback from natural creek channels of 100 ft. Development standards derived from mitigation measures that address water quality have been included. The slight shift in development to the western portion of the Carpinteria Marsh watershed will not change any of the potential impacts to the aquatic biological resources.

Residual Impacts

Residual Impacts B-1, B-2, B-3, B-4, and B-6 remain significant but mitigable (Class II). Residual Impacts B-5 remains less than significant (Class III).

III. MINOR TEXT CHANGES AND CLARIFICATIONS TO ORIGINAL PROJECT DESCRIPTION (PROPOSED AG-I-CARP AND AG-I-OF ZONE DISTRICTS)

Extensive comment was received after the close of the public comment period on the Draft EIR and throughout the course of the public hearings. It was determined, based on this comment, that several clarifications were necessary to the text of the project description, environmental setting, and impact analysis of the proposed Final EIR. No new significant impacts and no new mitigation measures have been identified in the EIR; however, some language has been modified to clarify the intent of the mitigation measures.

In addition, Impact LU/AG-3 has been revised. The reference that open field production had declined after greenhouses were developed on adjacent properties is not supported by statistical data. As such the text has been revised and the impact classification for Impact LU/AG-3 has been reduced from a Class II to a Class III (adverse, but not significant) impact. These text changes to the proposed Final EIR have been included as Appendix D to this revision document. As a result of these text changes no new impacts have been identified. In addition, no impact classifications have increased in magnitude (e.g. from Class II to Class I or from Class III to Class I or II).

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