

4.0 POLICY CONSISTENCY

4.1 INTRODUCTION

The State CEQA Guidelines require that an EIR “discuss any inconsistencies between the proposed project and applicable general plans and regional plans” (§15125.(b)). Accordingly, this section discusses the consistency of the proposed greenhouse program with policies of the County’s certified Local Coastal Program (LCP), including the Coastal Act, as well as other applicable policies of the Comprehensive Plan. This section also discusses potential project inconsistencies with other adopted regional plans such as the Clean Air Plan, the Congestion Management Plan, and the Regional Water Quality Control Plan.

Adopted policies that are directly applicable to the project are quoted, followed by a consistency analysis and preliminary finding of potential consistency or inconsistency. A final determination of the project’s consistency with these existing plans and policies would be made by the appropriate agencies (County Board of Supervisors and California Coastal Commission), with recommendations from staff and, in the case of the Board of Supervisors, the County Planning Commission.

4.2 COASTAL ACT, LOCAL COASTAL PROGRAM, AND COMPREHENSIVE PLAN POLICIES

4.2.1 Land Use

Public Resources Code (PRC) Section 30241: *The maximum amount of prime agricultural land shall be maintained in agricultural production to assure the protection of the areas’ agricultural economy, and conflicts shall be minimized between agricultural and urban land uses through all of the following:*

- (a) By establishing stable boundaries separating urban and rural areas, including, where necessary, clearly defined buffer areas to minimize conflicts between agricultural and urban uses.*
- (b) By limiting conversions of agricultural lands around the periphery of urban areas to the lands where the viability of existing agricultural use is already severely limited by conflicts with urban uses or where the conversion of the lands would complete a logical and viable neighborhood and contribute to the establishment of a stable limit to urban development.*

Land Use Element – Area/Community Goals – Carpinteria

- Existing agriculture should be preserved above Foothill Road and east and above Casitas Pass Road. Lands with prime soils located below Foothill should also remain in agriculture use.
- The agricultural economy and the semi-rural qualities of the area should be preserved.
- Buffer strips should be required to separate extreme differences in land use.

Comment: No changes in land use, other than the treatment of greenhouse development greater than the 20,000 sf cumulative threshold, will occur through the implementation of the Carpinteria Valley Greenhouse Program. While no changes in land use would occur as a result of the proposed project, nNew greenhouse development that exceeded the threshold would be limited

to areas ~~zoned designated by the~~ AG-I-CARP, while treatment of development below the the 20,000 sf threshold would continue to be permitted in both the AG-I-CARP and ~~zone district~~. ~~In the AG-I-OF zone districts as they currently are under the existing AG-I zoning, a diversity of open field uses would be promoted and new greenhouse development would be precluded.~~ -All agricultural practices located above Foothill Road would continue as under current existing conditions. No changes would occur to the urban/rural boundary and limits to conversion of agricultural lands to other uses would continue to be in effect. By limiting greenhouse expansion to specific parcels identified by the AG-I-CARP zone district, the economic benefits of the greenhouse industry would be balanced with preserving the semi-rural character of the Carpinteria Valley and the promotion of open field agricultural uses. In addition, landscaping and setbacks shall be required between greenhouse agriculture and other land uses (e.g., 50 feet from residential uses and 100 feet from environmentally sensitive habitats) which will serve as buffers between incompatible land uses. POTENTIALLY CONSISTENT

4.2.2 Agricultural Resources

PRC Section 30241: *The maximum amount of prime agricultural land shall be maintained in agricultural production to assure the protection of the areas' agricultural economy, and conflicts shall be minimized between agricultural and urban land uses through all of the following:*

- (a) By establishing stable boundaries separating urban and rural areas, including, where necessary, clearly defined buffer areas to minimize conflicts between agricultural and urban uses.*
- (f) By assuring that all divisions of prime agricultural lands, except those conversions approved pursuant to subdivision (b) of this section, and all development adjacent to prime agricultural lands shall not diminish the productivity of such prime agricultural lands.*

Agricultural Element Goal I: *Santa Barbara County shall assure and enhance the continuation of agriculture as a major viable production industry in Santa Barbara County. Agriculture shall be encouraged. Where conditions allow, (taking into account environmental impacts) expansion and intensification shall be supported.*

Agricultural Element 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.*

Agricultural Element Policy I.F: *The quality and availability of water, air, and soil resources shall be protected through provisions including but not limited to, the stability of Urban/Rural Boundary Lines, maintenance of buffer areas around agricultural areas, and the promotion of conservation practices.*

Agricultural Element Policy I.G: *Sustainable agricultural practices on agriculturally designated land should be encouraged in order to preserve the long-term health and viability of the soil.*

Land Use Element – Area/Community Goals – Carpinteria

- Every effort should be made to preserve fertile lands for agriculture.

Agriculture Preserve Uniform Rules: *The Uniform Rules are the local implementation of the Land Conservation Act (Williamson Act) and include criteria for creation of Agricultural Preserves, compatible uses, withdrawal and termination of contracts, and changes in contracts.*

Comment: The program would not result in changes to the urban-rural boundary, nor in conversion from agricultural uses to other uses. The proposed project assesses the effects of greenhouse expansion and intensification in order to determine the appropriate level of expansion. The goal of the project is to continue and encourage both open field and greenhouse agriculture as viable production industries in the Valley on balance with protecting the Carpinteria Valley's unique coastal resources. The new open field zone district (AG-I-OF) in the Carpinteria Valley would preclude the expansion of any new greenhouse development of 20,000 sf or greater cumulative per parcel within that zone district, but would allow limited expansion of accessory structures. However, other agricultural uses that are currently allowed in the AG-I zone district (including greenhouse development less than 20,000 sf cumulative per parcel) would remain unchanged.

The AG-I-CARP zone is designed to allow greenhouse expansion in areas adjacent to existing greenhouse development, but not residential development. This would allow open field agriculture to serve as a transitional agriculture use between residential uses and more intensive greenhouse agriculture.

The development standards proposed under the new AG-I-CARP zone will encourage conservation practices to aid in the reduction of water use, improve water quality, and conserve soil resources by reducing erosion potential. The 50-foot setback from residential properties, landscaping, and other requirements will address conflicts with adjacent uses. In addition, mitigation measures are proposed which would address nuisance issues related to noise, visual, and traffic related impacts.

The majority of greenhouse growers cultivate in the native soil, maintaining prime soils in agriculture production. Other greenhouse operations, depending on the crop type, use containers or hydroponic systems, foregoing the use of native soils to maximize production. Nevertheless, greenhouses are an agricultural use that prevents the soils from being converted to non-agricultural uses. The program will include a development standard to minimize the covering of prime soils through effective site and building design and the use of pervious surfaces to the maximum extent feasible.

Related to the Williamson Act, implementation of the project would not affect the status of any contract land under the County's Agriculture Preserve Uniform Rules. Agricultural lands could continue to be placed and maintained in agriculture preserve contracts under the current eligibility requirements in either of the proposed new zone districts, whether developed with greenhouses or not. POTENTIALLY CONSISTENT

LCP Policy 8-5: *All greenhouse projects of 20,000 or more square feet and all additions to existing greenhouse development, i.e., greenhouse expansion, packing sheds, or other development for a total of existing and additions of 20,000 or more square feet, shall be subject to County discretionary approval and, therefore, subject to environmental review under County CEQA guidelines.*

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 all significant adverse impacts of the development as addressed in paragraphs "a" through "e" below have been identified and mitigated.

LCP Policy 8-6: *No greenhouse, hothouse, or accessory structure shall be located closer than 50 feet from the boundary line of a lot zoned residential. In addition, setback and minimum lot coverage requirements shall be as follows:*

<u>Parcel Size</u>	<u>Setbacks</u>	<u>Maximum Lot Coverage for All Structures</u>
Less than 5 acres	30 feet from the right-of-way of any street and 20 feet from the lot lines of the parcel on which the greenhouse is located.	75 percent
5 to 9.99 acres	30 feet from the right-of-way of any street and from the lot lines of the parcel on which the greenhouse is located.	70 percent
10 acres or more	30 feet from the right-of-way of any street and from the lot lines of the parcel on which the greenhouse is located	65 percent

Comment: The purpose of the previous two policies is to specifically address greenhouse development in the Carpinteria Valley coastal zone. These policies were included in the LCP ~~at a time when there was due to~~ heightened concern over the impacts of greenhouses on coastal resources. In 1986, the Board of Supervisors adopted a resolution that approved Greenhouse Development in the Carpinteria Valley: A Compilation and Assessment of Existing Information, 1977-85 as the Master Environmental Assessment required by Policy 8-5(e). Since that time several studies have been conducted in an attempt to more accurately identify impacts in the Carpinteria Valley (e.g., water quality and biological impacts to the Carpinteria Marsh). ~~Until now, there had not been any effort to comprehensively assess greenhouse related impacts nor identify the appropriate level of future development.~~ The primary purpose of ~~these proposed ordinance amendments and this environmental document~~ this program is to identify such impacts and to prescribe the location and amount of future greenhouse developments which would best serve to balance the economic benefits of the greenhouse industry with the protection of coastal resources. In addition, new development standards have been identified which are designed to address the full range of environmental issues associated with greenhouse development. The 20,000 square foot threshold for requiring a discretionary permit for greenhouse development remains unchanged, as well as limiting building coverage to between 65% and 75%, depending on parcel sizes. Incorporation of these mitigation development standards and amendments would address consistency with these policies. The permit requirements have been downshifted from a Development Plan (or Conditional Use Permit requirement currently in effect) to a Director approved Development Plan. Moreover, standardized criteria will be identified to address greenhouse development located throughout the Carpinteria Valley, ~~which eliminates the need for more onerous case-by-case review of greenhouse proposals.~~ POTENTIALLY CONSISTENT

4.2.3 Visual Resources and Aesthetics

PRC Section 30251: *The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas.*

LCP Policy 4-3: *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.*

Comment: All agricultural land in the Carpinteria Valley is within the coastal zone, and as such, is designated rural in spite of its close proximity to urban areas. Greenhouses in the Carpinteria Valley are located exclusively on the valley floor as they are inappropriate uses on hillsides. Depending on structure orientation and building materials, greenhouses produce strong glare that is noticeable from public roads and foothill locations.

The project proposes to limit future greenhouse ~~expansion-development of greater than 20,000 sf cumulative~~ to areas of existing clusters ~~of greenhouse-development~~ in the proposed AG-I-CARP zone district. ~~The proposed AG-I-OF district would limit greenhouse development to less than 20,000 sf cumulative per legal parcel. Cultivated agriculture would continue as in baseline (existing) conditions.~~ In addition, new development standards will provide better landscape screening around future greenhouse developments and encourage improvements at existing sites where ~~effective-current~~ screening ~~is inadequate of greenhouse structures has not been accomplished.~~ ~~The new AG-I-OF zone district will preclude~~ In areas zoned AG-I-OF, future greenhouse development greater than 20,000 sf will be prohibited. ~~new greenhouse development thereby maintaining the rural character of the Valley is those areas.~~ In addition to minimizing fragmentation of open field agricultural lands, ~~T~~hese actions will serve to preserve existing public view corridors and enhance aesthetics in visually degraded areas. However, ~~the addition of 3.0 million square feet of new greenhouses~~ development would significantly alter the character of the surrounding environment. POTENTIALLY ~~I~~NCONSISTENT

LCP Policy 4-2: *All commercial, industrial, planned development, and greenhouse projects shall be required to submit a landscaping plan to the County for approval.*

LCP Policy 8-7: *Landscaping and screening shall be installed within six months of completion of new greenhouses and/or accessory buildings. Such landscaping shall reasonably block the view of greenhouse structures and parking areas from the nearest public road(s) within five years of project completion.*

Comment: As discussed in the visual impact analysis of this document (Section 5.1), all greenhouse project applications will be required to submit a landscape plan approved by Planning and Development as a development standard prior to issuance of a Coastal Development Permit. POTENTIALLY CONSISTENT

4.2.4 Biological Resources

PRC Section 30231: *The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of wastewater discharges and entrainment, controlling runoff, preventing depletion of groundwater supplies and substantial interference with surface water flow, encouraging wastewater reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.*

PRC Section 30240 (Coastal Act):

(a) *Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on such resources shall be allowed within such areas.*

(b) *Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade such areas, and shall be compatible with the continuance of such habitat areas.*

LCP Policy 2-11: *All development, including agriculture, adjacent to areas designated on the land use plan or resource maps as environmentally sensitive habitat area shall be regulated to avoid adverse impacts on habitat resources. Regulatory measures include, but are not limited to, setbacks, buffer zones, grading controls, noise restrictions, maintenance of natural vegetation, and control of runoff.*

LCP Policy 9-1: *Prior to issuance of a development permit, all projects on parcels shown on the land use plan and/or resource maps with a Habitat Area overlay designation or within 250 feet of such designation or projects affecting an environmentally sensitive habitat area shall be found to be in conformity with the applicable habitat protection policies of the land use plan. All development plans, grading plans, etc. shall show the precise location of the habitat(s) potentially affected by the proposed project. Projects which could adversely impact an environmentally sensitive habitat area may be subject to a site inspection by a qualified biologist to be selected jointly by the County and the applicant.*

LCP Policy 9-11: *Wastewater shall not be discharged into any wetland without a permit from the Regional Water Quality Control Board finding that such discharge improves the quality of the receiving water.*

LCP Policy 9-14: *New development adjacent to or in close proximity to wetlands shall be compatible with the continuance of the habitat area and shall not result in a reduction in the biological productivity or water quality of the wetland due to runoff (carrying additional sediment or contaminants), noise, thermal pollution, or other disturbances.*

Comment: The proposed AG-I-CARP zone district lists development standards that all new greenhouse developments will have to meet. In addition, any new greenhouse development in the AG-I-OF zone must also meet height, setback, drainage, and erosion control measures of AG-I-CARP. These include the construction of retention basins to control the rate of storm water runoff, and storage of any irrigation water runoff containing any pesticides or fertilizers for proper disposal. To the greatest extent possible water and nutrient recycling equipment will be implemented to decrease water demand, use fertilizers more efficiently, and decrease nutrient runoff. Any contaminated water, including runoff containing pesticides or fertilizers and boiler blow-down, must be discharged in accordance with U.S. Environmental Protection Agency (EPA)

and California Regional Water Quality Control Board (RWQCB) regulations. Such wastewater must be stored onsite until proper disposal can be made, or a permit issued by the RWQCB states that the receiving waters would not be impacted **if wastewater is discharged**. Mitigation measures discussed under the water quality and groundwater resources section of this document (Section 5.2) will further assist in the prevention of water quality degradation. Septic disposal must continue to meet all requirements of County Environmental Health Services. These standards will reduce the potential degradation of water quality and associated aquatic ecosystems that could occur with intensification of greenhouse uses. POTENTIALLY CONSISTENT

LCP Policy 9-35: *Oak trees, because they are particularly sensitive to environmental conditions, shall be protected. All land use activities, including cultivated agriculture and grazing, should be carried out in such a manner as to avoid damage to native oak trees. Regeneration of oak trees on grazing lands should be encouraged.*

LCP Policy 9-36: *When sites are graded or developed, areas with significant amounts of native vegetation shall be preserved. All development shall be sited, designed, and constructed to minimize impacts of grading, paving, construction of roads or structures, runoff, and erosion on native vegetation. In particular, grading and paving shall not adversely affect root zone aeration and stability of native trees.*

LCP Policy 9-37: *The minimum buffer strip for major streams in rural areas, as defined by the land use plan, shall be presumptively 100 feet, and for streams in urban areas, 50 feet. These minimum buffers may be adjusted upward or downward on a case-by-case basis. The buffer shall be established based on an investigation of the following factors and after consultation with the Department of Fish and Game and Regional Water Quality Control Board in order to protect the biological productivity and water quality of streams:*

- a. *soil type and stability of stream corridors*
- b. *how surface water filters into the ground*
- c. *slope of the land on either side of the stream*
- d. *location of the 100-year flood plain boundary*

Riparian vegetation shall be protected and shall be included in the buffer. Where riparian vegetation has previously been removed, except for channelization, the buffer shall allow for the reestablishment of riparian vegetation to its prior extent to the greatest degree possible.

Comment: These policies will continue to be applied on a case-by-case basis as individual greenhouse **project-development** applications move through the permitting process. New greenhouse development will continue to be subject to required setbacks from environmentally sensitive habitats, buffer zones, grading controls and noise restrictions. Maintenance of vegetative cover will be encouraged, and construction of retention basins to reduce storm water runoff will be required unless exempted by the County Flood Control District. POTENTIALLY CONSISTENT

4.2.5 Water Resources

LCP Policy 2-2: *The long term integrity of groundwater basins or sub-basins located wholly within the coastal zone shall be protected. To this end, the safe yield as determined by competent hydrologic evidence of such a groundwater basin or sub-basin shall not be exceeded except on a temporary basis as part of a conjunctive use or other program managed by the appropriate water district. If the safe yield of a*

groundwater basin or sub-basin is found to be exceeded for reasons other than a conjunctive use program, new development, including land division and other use dependent upon private wells, shall not be permitted if the net increase in water demand for the development causes basin safe yield to be exceeded, but in no case shall any existing lawful parcel be denied development of one single family residence. This policy shall not apply to appropriators or overlying property owners who wish to develop their property using water to which they are legally entitled pursuant to an adjudication of their water rights.

LCP Policy 2-5: *Water-conserving devices shall be used in all new development.*

LCP Policy 2-9: *The existing water supply of the Carpinteria County Water District (67,541 AFY, see Table 7-1, Carpinteria Valley planning area section) shall be divided between the County and the City of Carpinteria on the basis of historical use; 30 percent (2,262 AFY) shall be allocated for use with the City and 70 percent shall be allocated for use within the County. The uncommitted water surplus in the Carpinteria County Water District may be increased proportionate to the amount of additional documented water such as that provided by reinjection programs and/or water reclamation and reservoir facilities which are designed to collect and reclaim wastewater and runoff from swales, creeks, or waterways which the district has the legal right to so utilize.*

The total uncommitted water surplus within the district shall be reevaluated on an annual basis.

Action

The County's portion of the uncommitted water surplus shall be allocated for priority uses, including but not limited to the following:

- 1. Agriculture: Water shall be distributed between open field crops and greenhouses, nurseries, and cover crops on the basis of established water usage, i.e., approximately 56 percent of the agricultural water supply shall be used for open field crops and 44 percent for greenhouses, nurseries, and other cover crop production.*

LCP Policy 3-19: *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.*

Conservation Element Policy 3.5: *In coordination with any applicable groundwater management plan(s), the County shall not allow, through its land use permitting decisions, any basin to become seriously overdrafted on a prolonged basis.*

Conservation Element Policy 3.6: *The County shall not make land use decisions which would lead to the substantial overcommitment of any groundwater basin.*

Comment: The Carpinteria Groundwater Basin is not in overdraft and is operating with a surplus of approximately 2,000 acre-feet. As discussed in the water quality and groundwater impact analysis of this document (Section 5.2), development of an additional 3.0 million square feet of greenhouse **developments** coupled with the use of water conservation devices (e.g., drip irrigation, water-recycling systems) is unlikely to cause the Carpinteria Groundwater Basin to go into a state of overdraft. **No changes to the basin are expected as a result of continued open field cultivation.** With the implementation of the mitigation measures proposed in this document, degradation of water quantity should not result.

Sewage shall be treated by hookup to the Carpinteria Sanitary District or by proper construction and maintenance of a septic system in accordance with County Environmental Health Services requirements. Such a system will require appropriate setbacks from buildings, property lines, wells, storm water retention facilities, streams, etc. and will prevent water quality degradation. Pollutants shall be stored on site and disposed of in accordance with U.S. EPA and California Regional Water Quality Control Board regulations. POTENTIALLY CONSISTENT

4.2.6 Geologic Processes and Flooding

PRC Section 30253(1): *New development shall minimize risks to life and property in areas of high geologic, flood, and fire hazard.*

LCP Policy 3-11: *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.*

LCP Policy 3-12: *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 channelizations, etc.*

LCP Policy 3-18: *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.*

Coastal Plan Policy 9-37: *The minimum buffer strip for major streams in rural areas, as defined by the land use plan, shall be presumptively 100 feet, and for streams in urban areas, 50 feet. These minimum buffers may be adjusted upward or downward on a case-by-case basis. The buffer shall be established based on an investigation of the following factors and after consultation with the Department of Fish and Game and Regional Water Quality Control Board in order to protect the biological productivity and water quality of streams:*

- a. *soil type and stability of stream corridors*
- b. *how surface water filters into the ground*
- c. *slope of the land on either side of the stream*
- d. *location of the 100-year flood plain boundary*

Riparian vegetation shall be protected and shall be included in the buffer. Where riparian vegetation has previously been removed, except for channelization, the buffer shall allow for the reestablishment of riparian vegetation to its prior extent to the greatest degree possible.

Coastal Plan Policy 9-42: *The following activities shall be prohibited within stream corridors: cultivated agriculture, pesticide applications, except by a mosquito abatement or flood control district, and installation of septic tanks.*

Seismic Safety and Safety Element Flood Hazard Recommendations: *In stream channels or floodway areas (Categories 1 and 2), no structures should be built, and any agricultural or recreational uses should be subject to controls so that the flood-carrying capacity of the stream is not impaired. However, utilizing more detailed engineering studies, applicants for development permission should be allowed to demonstrate to the satisfaction of the Flood Control Engineer that the boundaries of Category 1 or 2 areas should be adjusted.*

Comment: *The program will not result in conversion of uncultivated lands into agriculture. Greenhouse development expansion is currently not allowed, nor will ~~not~~ be allowed to occur in stream channels. Unless exempted by the County Flood Control District, all new greenhouse development will be required to include retention basins to catch and retard storm water runoff to reduce the risk of flood hazards downstream. As discussed in Section 5.3, Flooding and Drainage, these basins must be designed to meet post-development peak flow rates of less than 75% of pre-development runoff rates. POTENTIALLY CONSISTENT*

4.2.7 Traffic and Circulation--County Circulation Element Standards

Roadway Standards: *The policy capacities provided in this Element shall be used as guidelines for evaluating consistency with this section of the Element. A project's consistency with this section shall be determined as follows:*

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

Intersection Standards:

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

Comment: Individual greenhouse development ~~requests-applications~~ will be subject to applicable peak hour impact fees to address impacts to affected roadways or intersections. CONSISTENT

4.2.8 Noise

Noise Element Policy 1: *65 decibels Day-Night Sound Level should be regarded as the maximum exterior noise exposure compatible with noise-sensitive uses.*

Noise Element Policy 2: *Noise sensitive uses include residences and educational facilities.*

Comment: Noise sensitive uses adjacent to greenhouse development include educational facilities and residential uses. All new greenhouse development ~~in the AG I-CARP zone district~~ will be subject to development standards including, but not limited to, setbacks of loading areas of at least 100 feet from residential uses and limits on amplification systems. Implementation of engineering design and proper placement of noise-generating devices at least 200 feet from

sensitive noise receptors should prevent noise levels from exceeding the 65 dB(A) threshold.
POTENTIALLY CONSISTENT

4.2.9 Air Quality

PRC Section 30253(3): *New development shall be consistent with requirements imposed by an air-pollution control district or the State Air Resources Control Board as to each particular development.*

PRC Section 30253(4): *New Development shall minimize energy consumption and vehicle miles traveled.*

LCP Policy 11-1: *The provisions of the Air Quality Attainment Plan shall apply to the coastal zone.*

Comment: The proposed project would not result in any significant increase in vehicle trips, nor in any significant increase in stationary source emissions. POTENTIALLY CONSISTENT

4.2.10 Cultural Resources

PRC Section 30244: *Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.*

LCP Policy 10-1: *All available measures, including purchase, tax relief, purchase of development rights, etc., shall be explored to avoid development on significant historic, prehistoric, archaeological, and other classes of cultural sites.*

LCP 10-2: *When developments are proposed for parcels where archaeological or other cultural sites are located, project design shall be required which avoids impacts to such cultural sites if possible.*

LCP 10-3: *When sufficient planning flexibility does not permit avoiding construction on archaeological or other types of cultural sites, adequate mitigation shall be required. Mitigation shall be designed in accord with guidelines of the State Office of Historic Preservation and the State of California Native American Heritage Commission.*

Comment: A review of the County's cultural resource database indicates that No cultural resources are known to exist within areas proposed for greenhouse expansion; however, some resources are known to occur in the study area. The potential for conversion of land to cultivated agriculture as a result of program adoption is minimal. Nevertheless, all future greenhouse development will be subject to the County's standard cultural resource protection policies. ~~s~~Should any cultural resources be uncovered during the excavation and construction of any greenhouse or accessory structure all existing policies governing cultural resources would be in effect. POTENTIALLY CONSISTENT

4.2.11 Services, Resources, and Infrastructure

LCP Policy 2-6: *Prior to issuance of a development [use] 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.

Comment: Greenhouse development applications will be reviewed on a case-by-case basis to determine the adequacy of public or private services at the time of the application.
POTENTIALLY CONSISTENT

4.3 OTHER PLANS AND POLICIES

4.3.1 Williamson Act

The Williamson Act is a voluntary land conservation program administered by counties and cities, with technical assistance from the California Department of Conservation. It was created to balance the pressure for urban growth by providing an incentive for farmers and ranchers to remain in agriculture. When land is enrolled in Williamson Act contract, landowners are taxed at a lower rate, using a scale based on the actual use of the land for agricultural purposes, as opposed to its unrestricted market value.

Comment: While the project proposes to change the zoning ordinance in the Carpinteria Valley, it does not propose to remove any lands from the potential for agricultural use. Lands currently in Williamson Act contracts will continue to be so with the adoption of the project. All other agricultural lands in the Carpinteria Valley will continue to be eligible for agriculture preserve contracts under the existing Uniform Rules. POTENTIALLY CONSISTENT

4.3.2 Clean Air Plan (CAP)

The 1998 Clean Air Plan includes transportation control measures such as ridesharing, employee-based transportation management programs, bicycling, motor vehicle improvements, and encouragement of alternative work schedules, to reduce traffic congestion and overall vehicular travel. The CAP's air quality modeling and attainment strategies relied upon the land use and population projections of "FORECAST '94" (Santa Barbara County Association of Governments, 1994), which in turn were based upon local agency general plans and related policies and ordinances. The proposed greenhouse expansion would not generate new vehicular traffic at levels resulting in significant air quality impacts nor any additional significant stationary source emissions. Because the potential increase of open field cultivated agriculture is expected to be minimal, the proposed AG-I-OF zone district would not result in significant air quality impacts.
POTENTIALLY CONSISTENT

4.3.3 Congestion Management Plan (CMP)

The Santa Barbara County Association of Governments has developed a set of traffic impact guidelines to assess impacts of land use decisions made by local jurisdictions on regional transportation facilities located within the County CMP roadway system. The construction of approximately 3.0 million square feet of additional greenhouse development and minimal

expansion of open field agriculture is-are not anticipated to generate significant traffic impacts, nor would the proposed project be in conflict with any traffic impact guidelines. CONSISTENT

4.3.4 Regional Water Quality Control Plan (RWQCP)

The objective of the Water Quality Control Plan for the Central Coast Region (Basin Plan) is “to show how the quality of surface and groundwater in the Coast Region should be managed to provide the highest water quality reasonably possible.” The plan specifies “beneficial uses” of the region’s waters and describes the water quality objectives, which must be obtained to support the beneficial uses. The proposed ordinance amendment includes a development standard that requires all new greenhouse development projects to incorporate the applicable waste discharge and storm water runoff standards. Continuation of open field cultivation is a part of baseline (existing) conditions. POTENTIALLY CONSISTENT

4.4 LAND USE POLICY SUMMARY

The proposed project has been determined to be potentially consistent with all applicable policies of the Comprehensive Plan (which includes the Local Coastal Plan) with the exception of LCP policy 4-3, which addresses the protection of visual resources. Policy 4-3 requires that development shall be compatible with the character of the surrounding area and subordinate in appearance to the natural landforms and designed to follow the natural contours of the land as seen from public viewing places. As discussed in Section 5.1, due to its scale and design greenhouse development at buildout will result in significant visual impacts and a significant change in the rural, agricultural character of the Carpinteria Valley. However, the LCP also includes several policies which call for the protection and continuation of agriculture as a coastal resource of local and regional importance. In addition, greenhouse development is generally constructed on lands of less than 5% slope and therefore follow the natural contours of the land. Because the surrounding area contains 14.9 million sf of existing greenhouse development, additional infill development may be found consistent. Mitigation measures may be considered to subordinate the appearance to natural landforms. ~~Because greenhouses are determined to be an agricultural use, they also determined to be a coastal dependent use under both the Coastal Act and the County’s LCP and therefore promoted as priority coastal dependent development.~~

~~To address this potential policy contradiction, the LCP also includes a policy which address conflicts between competing policies. Specifically, LCP policy 1-2 states that:~~

~~Where policies within the land use plan overlap, the policy which is most protective of coastal resources shall take precedence.~~

~~Because agriculture has been determined to be a coastal dependent use, the balancing provision contained in LCP policy 1-2 could allow County decision makers to determine expansion and intensification of agricultural uses (including greenhouse development) may be allowed even if impacts to other resources or policy inconsistencies could result. The County has also adopted a “Right To Farm” ordinance which protects agricultural operations by notifying adjacent residential uses of the potential for nuisance and other land use conflicts which may result from agricultural operations.~~

The Carpinteria Valley Greenhouse Program has been developed in consideration of the community's circumstances, needs, and desires, including but not limited to competing factors regarding resource and open space protection, the agricultural economy and semi-rural qualities of the area, and service and infrastructure capacities. In addition, mitigations measures have been identified which would further lessen the impacts associated with greenhouses. The proposed project attempts to balance these resource protection issues by limiting future greenhouse development to specific parcels, which are primarily located within or adjacent to existing greenhouse clusters. Impacts to coastal resources are minimized, on balance, while allowing the continuation of highly productive coastal agricultural operations. In addition, mitigations measures have been identified which would further lessen the impacts associated with greenhouses development. The County Board of Supervisors and the California Coastal Commission will make a final determination of the project's consistency with existing plans and policies. The Board of Supervisors will consider how the Program respects service, resource, and infrastructure capacities while accommodating development to a degree and in a manner which provides the greatest community welfare with the least public and private harm.