7.0 ALTERNATIVES

As required by CEQA, this section evaluates a range of reasonable alternatives to the proposed project. All alternatives selected for analysis should be able to be "accomplished within a reasonable period of time, taking into account economic, legal, social, and technological factors" (*Public Resources Code* 21061.1 and *State CEQA Guidelines* 15364) and should be able to "feasibly attain the basic objectives of the project" (State CEQA Guidelines 15126.6). The discussion of each alternative focuses on the comparative merits of the alternatives relative to the proposed project for each environmental issue. Alternatives analyzed herein include: the CEQA required "no project" alternative; and two alternative buildout scenarios. This section also includes a discussion of those alternatives considered but rejected during the environmental review process.

The range of alternatives required in an EIR is governed by the "rule of reason" that requires an EIR to set forth only those alternatives necessary to permit a reasoned choice. An EIR need not consider every conceivable alternative to a project. The EIR needs to examine in detail only those alternatives that the Lead Agency determines could feasibly attain most of the basic objectives of the project. The range of reasonable alternatives must be selected and discussed in a manner to foster meaningful public participation and informed decision-making (*State CEQA Guidelines* §15126.6). Sites outside of the Carpinteria Valley are not evaluated for potential future greenhouse expansion. The range of alternatives addressed below focus upon agriculturally designated lands within the Carpinteria Valley. The project objectives and range of alternatives reflects the County's commitment to address the California Coastal Commission concerns relating to greenhouse development in the Carpinteria Valley by assessing cumulative impacts and designating lands appropriate for future greenhouse development in the Carpinteria Valley. Alternative sites would not meet this objective. In addition, greenhouses are considered agriculture and therefore are suitable on agricultural lands, if appropriately sited.

The alternatives were developed and selected by the lead agency using generally the same criteria as for the proposed project, as outlined in the *Carpinteria Valley Greenhouse Study Options Paper* (February 1999). These criteria included such factors as proximity to existing historic greenhouse clusters, parcel visibility, distance from adjacent incompatible land uses (residential, schools, etc.), distance from water courses, existing crop type, and parcel size.

The following analysis focuses on the impacts that could occur at buildout of major greenhouse development for each alternative. Under the No Project Alternative, the AG-I zone district would remain in effect and the environmental analysis focuses on the probable maximum buildout over a 15-year period.

The High Build and Low Build Alternatives are substantially similar to the project. Both alternatives propose the same two zone districts (AG-I-CARP and AG-I-OF) as does the project with the only differences being location and amount of future greenhouse expansion in the proposed AG-I-CARP zone and a corresponding increase or decrease in the number of parcels to be zoned AG-I-OF. The AG-I-OF zone district retains the provisions of the existing AG-I zone district (No Project Alternative) except for greenhouse development 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 AG-I-CARP and AG-I-OF (High Build and Low Build Alternatives). As stated in Section 3.0, 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. As discussed in Section 3.0, Environmental Setting, 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. Therefore, there are no reasonably foreseeable significant impacts associated with the proposed AG-I-OF zone district in the alternatives and no further discussion is warranted in this alternatives analysis.

7.1 NO PROJECT ALTERNATIVE

Section 15126.6(e) of the State CEQA Guidelines requires evaluation of a "no project" alternative. For this EIR, the no project alternative is assumed to be a scenario wherein full buildout occurs in accordance with the existing general plan designation and zoning.

a. Description. The No Project Alternative assumes that existing Comprehensive Plan policies, Article II Zoning Ordinance (AG-I zone district) requirements, Local Coastal Plan policies, and other county plans, policies, and programs now in effect would continue to apply. Applications for greenhouse development would continue to be processed on a case-by-case basis through a major conditional use permit with no restrictions on the location of such development within the AG-I zone district. Under this option, development standards would be identified through individual environmental and permit review.

Approximately 3 million square feet of greenhouse development has been approved within the study area during the last 10 years (Santa Barbara County, 1999). The No Project Alternative assumes this growth rate would continue over the next 15 years, resulting in an increase of 4.5 million square feet of new greenhouse development. Figures 7-1 (West) and 7-2 (East) represent a conceptual map depicting one possible development scenario assuming buildout under the No Project Alternative. While these figures are presented for illustrative purposes only, the concept is based upon historic in-fill development trends, the location of open field land owned by greenhouse growers, and ownership patterns of growers known to have greenhouse expansion interests. The location and rate of future greenhouse development is speculative and influenced by a variety of factors, including economic stability, industry competition, availability of suitable land, governmental regulations, and business objectives of individual growers. The No Project Alternative could permit greenhouse expansion on any AG-I zoned parcel within the study area.

Figure 7-1 No Project Alternative - West Panel

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Figure 7-2 East Panel

Second page 11x17

Impact Analysis.

Visual. The no project alternative would allow the continued development of greenhouses on any parcel within the study area. No "cap" on the total amount of greenhouse development would be imposed through the zoning restriction. It is likely that greenhouse development would tend to be clustered around existing greenhouses, but it is possible that such development could be scattered throughout the study area, which could cause a significant impact depending on the specific location. Thus, impacts relating to open space conversion would be *Class I, significant and unavoidable.*

Given the proximity to existing greenhouse clusters, it is likely that a substantial amount of future greenhouse expansion would occur within visually prominent open space corridors along Via Real, Cravens / Santa Monica Road, and north of Highway 192 east of Linden Avenue and Carpinteria High School. Greenhouse expansion on remaining parcels fronting Highway 192 would obscure foreground, middle ground, and background views that could create a "tunnel" effect of structural development and landscape screening. Since these areas are highly visible as seen from Highway 101, Highway 192, and other public roadways, further greenhouse expansion in these areas would lead to significant and unavoidable visual impacts, loss of existing open space, and a change in the rural character of the area *(Class I).* With no restrictions on the location of greenhouse development, it is likely that new greenhouse clusters could be developed in the eastern portion of the valley (east of Carpinteria Creek). Depending upon the extent of greenhouse development in this area, the introduction of large building masses and associated structural development could substantially alter the rural character of this portion of the valley which is predominantly comprised of orchards and open field agriculture. This alternative would also contribute to a *Class I* cumulative impact to visual resources in the Carpinteria Valley.

Impacts relating to light and glare are considered potentially significant under this alternative. However, as with the proposed project, implementation of appropriate lighting controls would reduce impacts to a *Class II* level.

Water and Groundwater. The No Project Alternative would be expected to result in greater surface quality impacts, due to both the increase in overall construction activity and associated sedimentation and the general long-term increase in polluted runoff associated with the approximately 50% increase in impervious surface area throughout the Carpinteria Valley. Similar to the proposed project, surface water quality impacts would *be Class II, significant but mitigable.* The No Project Alternatives' contribution to cumulative water quality impacts to Carpinteria Marsh would be considered *significant and unavoidable (Class I).*

Groundwater consumption would be greater than the proposed project. Using the 1.6 AFY / acre water demand factor for avocados and the 4.0 AFY / acre water demand factor for cut flowers (chrysanthemums), the potential increase in water use for the No Project Alternative would be 250 AFY (2.4 AFY / acre x 104 acres = 250 AFY). While a substantial amount of water, it would not represent a significant impact, as the basin would remain in a state of surplus. Although the increased development potential may incrementally reduce groundwater basin recharge potential, impacts are considered *Class III, adverse but not significant.*

Flooding and Drainage. Development of greenhouses under this scenario could potentially occur within existing flood areas. This may result in greater flooding impacts than that associated with the proposed project. In addition, the greater level of development that may occur would cause a correspondingly slightly greater increase in peak flood flows that would require mitigation. As with the proposed project, all impacts relating to flooding and drainage would be Class II, significant but mitigable. This alternative is considered slightly inferior to the proposed project in this regard.

Land Use and Agriculture. This alternative could allow more greenhouses adjacent to residential uses located throughout the project study than would be permitted under the proposed project. Such development would lead to an increase in significant land use conflicts relating to aesthetics, noise, traffic, and the cumulative change in community character. In addition, mitigation measures identified as part of the proposed project may not be implemented, as mitigations would be identified on a case-by-case basis. Therefore, impacts related to land use conflicts could be greater than the proposed project and remain *significant and unavoidable (Class I).*

The creation of new greenhouse cluster areas potentially scattered throughout the valley could result in fragmentation of highly productive blocks of open field agricultural land. Fragmentation may result in increased intra-agricultural conflicts between greenhouse operators and open field growers; increased pressures upon open field lands to convert into greenhouse production; and crop flexibility may be compromised, especially for crops requiring large, contiguous blocks of agricultural land to be profitable.

Impacts related to the loss of agricultural soils due to accessory structures would be slightly greater than under the proposed project, as more development would be allowed to occur. These impacts are considered *Class II, significant but mitigable.* Similarly, impacts relating to interference with other agricultural operations would also be slightly greater as more greenhouse development would occur adjacent to open field or orchard operations. These impacts are considered *Class III, less than significant ~~and mitigable~~.*

Traffic and Circulation. As shown in Table 7-1, the No Project Alternative would generate 1,215 ADT, 135 A.M. PHT and 270 P.M. PHT. This is 393 ADT, 44 A.M. PHT and 87 P.M. PHT more than the proposed project, or an approximately 48% increase in traffic as compared to proposed project buildout. Although a slightly higher level of traffic, the level of significant impacts would be the same as the proposed project. The 393 additional ADT would be added to the area roadways throughout the planning area. This alternative would generate 69 additional light to medium truck trip-ends and 20 large truck trip-ends per average weekday than the proposed project. As with the proposed project, significant impacts could occur at the Santa Monica / Via Real / U.S. 101 NB ramps and Linden / U.S. 101 SB off-ramp intersections. Since the timing of proposed improvements is unknown, and funding for these improvements has not been secured, residual impacts would remain *significant and unavoidable (Class I).*

The No Project Alternative would send additional traffic to the Highway 192 / Cravens Lane intersection, which has a statistically significant collision rate. Until specific intersection improvements are identified and funded, the No Project Alternatives' contribution to this existing impact would be considered *significant and unavoidable (Class I).*

Impacts relating to truck operation and sight distance would be somewhat greater than those of the proposed project due to the potentially higher overall volume of traffic and are considered *Class II, significant but mitigable.*

Table 7-1 Alternative Scenarios
Trip Generation Estimates

Alternative	ADT	A.M. Peak Hour Trips	P.M. Peak Hour Trips	Light to Medium Truck Trip-Ends[1]	Large Truck Trip-Ends	Total Truck Trip-Ends
Proposed Project	822	91	183	148	41	189
No Project	1,215	135	270	217	61	278
Low Buildout	589	26	52	106	49	155
High Buildout	1,158	129	257	208	58	266

Air Quality. Greenhouse construction under the no project alternative would cause *Class II, significant but mitigable* temporary impacts. Although peak daily construction emissions would be similar to the proposed project, overall emissions would be somewhat greater due to the greater amount of development allowed.

This alternative would result in a 48% increase in trips as compared to the proposed project and therefore a similar increase in mobile source air pollutant emissions. However, it would also increase the beneficial impact of reduced particulate emissions associated with the stabilization of the soil surface under greenhouse operations. Significant mobile source emissions are not anticipated from individual greenhouses since emissions of ROG and NO_X would be below the APCD's 25 pounds-per-day threshold for both pollutants. Operational impacts associated with cumulative buildout of greenhouses is considered *adverse, but not significant (Class III)* because emissions would constitute a comparatively small amount of countywide daily emissions (less than 0.1%).

Noise. While it is difficult to predict the location of greenhouse development under this scenario, it is likely that construction noise would occur at locations near residential land uses, potentially to a greater degree than under the proposed project. This is because the proposed project zoning designations would exclude certain parcels that are adjacent to residential areas from greenhouse development. The magnitude of construction noise remains the same as for the proposed project (Class II), though the overall potential for noise exposure would be somewhat greater.

This alternative would accommodate about 50% more greenhouse building area and some of the additional greenhouse operations may occur near sensitive noise receptors (i.e., residential, schools, etc.). Therefore, the potential for nuisance noise problems is also greater. Impacts associated with on-site operation of equipment and on-site vehicle movement would be greater than those of the proposed project and are considered *Class II, significant but mitigable.*

[1] A trip-end is one-way; either a truck leaves a site or arrives at a site.

Buildout of this alternative would generate about 48% more overall traffic than the proposed project. Because of the relatively low numbers of vehicle trip generation associated with greenhouse development, cumulative development under the no project alternative would have no significant effect on the current traffic noise levels in the area. The proposed project is estimated to contribute 0.1 dB(A) and 0.3dB(A) increase to cumulative noise levels which is not considered a perceptible noise level increase (minimum 3 dB(A) increase). Construction of the No Project Alternative would increase cumulative noise levels, however, the levels are not anticipated to exceed a 3 dB(A) increase. Cumulative traffic-related noise impacts for the No Project Alternative are considered *adverse, but not significant (Class III).*

Biological Resources. Without restrictions on the location of greenhouse development and the potential inclination to avoid urban areas as discussed under land use above, there is a greater likelihood that greenhouse development could occur near Arroyo Paredon and Carpinteria Creek. This could result in the loss of native habitat along these creeks and an increase in the pollutant load currently experienced. This is considered a Class II, significant but mitigable impact. Indirect impacts relating to the alteration of seasonal flow in area drainages may be somewhat greater under this alternative due to the increased development potential, but are considered *Class III, adverse but not significant.*

This alternative's impact to foraging areas and wildlife corridors is considered *Class III, adverse but not significant.* Nevertheless, the 50% increase in greenhouse development potential would also increase the potential for impacts as compared to the proposed project.

7.2 ALTERNATIVE BUILDOUT SCENARIOS

7.2.1 Low Buildout

a. Description. This scenario examines the potential impacts that would be associated with a more limited area of greenhouse development than that currently proposed. Buildout of this alternative would be similar to the EIR project description; however, potential expansion of underdeveloped parcels and / or redevelopment of older greenhouses is encouraged as the primary means of accommodating new development (see Figures 7-3 and 7-4). Since many of the greenhouses within these clusters are of older design, redevelopment and / or retrofitting of these older structures could add greenhouse square footage and increase overall productivity. A new AG-I-CARP zone district would designate areas identified for greenhouse expansion while a new AG-I-OF (Open Field) zone district would designate open field areas.

This alternative scenario would result in the construction of approximately ~~2.28~~2.2 million square feet of greenhouse structures in the proposed AG-I-CARP zone district (see Appendix C for detailed parcel analysis). This total does not include additional development that would result from retrofitting and reconstruction of aging greenhouse structures.

b. Impact Analysis.

Visual. This alternative would rezone seven fewer parcels as AG-I-CARP than the proposed project, reducing the total land area within the proposed AG-I-CARP zone district from about 462 acres to 394 acres. This 15% reduction in greenhouse acreage would slightly reduce visual

Figure 7-3 Low Buildout west

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Figure 7-4 - Low Buildout East

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impacts relating to open space conversion and impacts to public viewsheds. However, impacts relating to conversion of open space and impacts to public view corridors would remain *significant and unavoidable (Class I).*

Impacts relating to light and glare are considered potentially significant under this alternative. However, as with the proposed project, implementation of appropriate lighting controls would reduce impacts to a *Class II level.*

Water and Groundwater. This alternative would reduce new greenhouse development buildout potential by 27% as compared to the proposed project. This reduction would incrementally reduce the discharge of nutrient-rich surface water to the local creek system and to the Carpinteria Salt Marsh. Such discharges have been positively correlated to past greenhouse development (see Section 5.2). Similar to the proposed project, surface water quality impacts would be *Class II, significant but mitigable.* The Low Buildout Alternatives' contribution to cumulative water quality impacts to Carpinteria Marsh would be considered *significant and unavoidable (Class I).*

Groundwater consumption would be similar to the proposed project because greenhouse-related water demand would be similar to that of existing open field agriculture. Using the 1.6 AFY / acre water demand factor for avocados and the 4.0 AFY / acre water demand factor for cut flowers (chrysanthemums), the potential increase in water use for the Low Buildout Alternative would be 120 AFY (2.4 AFY / acre x 50 acres = 120 AFY). While a substantial amount of water, it would not represent a significant impact, as the basin would remain in a state of surplus. Although the increased development potential may incrementally reduce groundwater basin recharge potential, impacts are considered *Class III, adverse but not significant.*

As with the proposed project, this alternative could incrementally reduce groundwater recharge due to the increase in impervious surface area; however, because total buildout would not be expected to alter the general hydrological characteristics of the Carpinteria Valley, impacts would be *Class III, adverse but not significant.*

Flooding and Drainage. This alternative would reduce the potential for flooding impacts that could be created by the increase in impermeable surfaces that is associated with greenhouses by reducing overall buildout potential by about 27%. It would also incrementally reduce the potential for flood damage to greenhouse structures as compared to the proposed project. Impacts relating to flooding and drainage are considered *Class II, significant but mitigable*.

Land Use and Agriculture. The primary land use impacts of the proposed project are the potential for visual, noise, and local traffic safety impacts with respect to adjacent residential uses. Potential land use conflicts under the Low Buildout Alternative would be similar to those of the proposed project *(Class I).*

The loss of prime agricultural soils to accessory building construction is a potential significant impact to agriculture. It is noted that while these impacts are significant, they are readily mitigable through the introduction of design standards and other requirements to be included in the new zoning designation. Impacts are therefore considered *Class II, significant but*

mitigable. Nonetheless, this alternative is considered superior to the proposed project with respect to agricultural impacts.

Traffic and Circulation. Table 7-1 provides a summary of the trip generation associated with the proposed project and alternatives. The Low Buildout alternative would generate 589 ADT, 65 A.M. PHT and 131 P.M. PHT. This is 233 ADT, 26 A.M. PHT and 52 P.M. PHT less than the proposed project. This represents about a 28% reduction in overall traffic generated in the study area. Most of the traffic reductions associated with this alternative would occur on Route 192, Cravens Lane, and Casitas Pass Road. The Low Build Alternative would result in 42 fewer light to medium truck trip-ends and 12 fewer large truck trip-ends per average weekday than the proposed project. Although overall impacts would be somewhat lower than for the proposed project, significant impacts could occur at the Santa Monica / Via Real / U.S. 101 NB ramps and Linden / U.S. 101 SB off-ramp intersections. Since the timing of proposed improvements is unknown, and funding for these improvements has not been secured, residual impacts would remain *significant and unavoidable (Class I).*

The Low Buildout Alternative would send additional traffic to the Highway 192 / Cravens Lane intersection, which has a statistically significant collision rate. Until specific intersection improvements are identified and funded, the Low Buildout Alternatives' contribution to this existing impact would be considered *unavoidable and significant (Class I).*

Impacts relating to truck operation and sight distance would be somewhat lower than those of the proposed project due to the potentially lower overall volume of traffic; however, as with the proposed project, such impacts are considered *Class II, significant but mitigable.*

Air Quality. Greenhouse construction under this alternative would cause temporary increases in air pollutant emissions, including fugitive dust. Although this alternative would involve about 27% less greenhouse development than the proposed project, construction-related impacts would be *Class II, significant but mitigable.*

As indicated in Table 7-1, this alternative would generate about 28% fewer vehicle trips than the proposed project. Therefore, a similar reduction in mobile source air pollutant emissions would occur. The reduced buildout potential would also reduce emissions associated with industrial boilers. However, it would also reduce the beneficial impact of reduced particulate emissions associated with the stabilization of the soil surface under greenhouse operations. Significant mobile source emissions are not anticipated from individual greenhouses since emissions of ROG and NO_X would be below the APCD's 25 pounds-per-day threshold for both pollutants. Operational impacts associated with cumulative buildout of greenhouses are considered *adverse, but not significant (Class III)* because emissions would constitute a comparatively small amount of countywide daily emissions (less than 0.1%).

Noise. Construction noise would still occur at locations near residential land uses under this alternative, and therefore the potential for significant construction noise impacts remains the same as for the proposed project. Such impacts would be somewhat lower than for the proposed project, but are considered *Class II, significant but mitigable.*

Figure 7-5 High Buildout Alternative (West)

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Figure 7-6 High Buildout Alternative (East)

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Elimination of greenhouses from six parcels would reduce the potential for operational noise in the immediate vicinity of these sites. However, greenhouse operations near sensitive residential land uses would still occur and there is the potential for nuisance noise problems. As with the proposed project, this impact is considered *Class II, significant but mitigable.*

Because of the relatively low numbers of vehicle trip generation associated with greenhouse development, cumulative development under the low buildout scenario would have no significant effect on the current traffic noise levels in the area. This alternative's impact upon traffic noise levels in the study area would be slightly less than that of the proposed project and is considered *Class III, adverse but not significant*.

Biological Resources. Impacts to biological resources are primarily related to the alteration of stream chemistry through the input of nutrients and other pollutants that could occur with greenhouse development. Under the low buildout alternative, 68 fewer acres in the watershed for the Carpinteria Salt Marsh would undergo conversion to greenhouse uses. This 15% reduction in area that could be converted to greenhouses would incrementally reduce the potential for adverse biological impacts. As with the proposed project, impacts relating to construction sedimentation, and increased nutrient and pollutant loads in area waterways are considered *Class II, significant but mitigable.* Nevertheless, this decrease in the potential for greenhouse development makes this alternative slightly superior to the proposed project.

Impacts relating to alteration of seasonal flow and open space foraging would be slightly lower than those of the proposed project due to the lower conversion potential. As with the proposed project, these impacts are considered *Class II, significant but mitigable* and *Class III, adverse but not significant* for this alternative, respectively.

7.2.2 High Buildout

a. Description. Under the High Buildout Alternative, the proposed AG-I-CARP zone district would be applied to all of the parcels under the proposed project, as well as six additional parcels located north of Highway 192 and east of Casitas Pass Road (see Figures 7-5 and 7-6). One of the factors for considering this area for expansion is that it has developed into an emerging greenhouse "cluster area" in recent years. Approximately 1.5 million square feet of new greenhouse structures have been approved in this area since 1989. Further consideration was given to ownership patterns of growers with known greenhouse expansion interests. Zoning ordinance requirements for this alternative would be the same as proposed for the AG-I-CARP zone district. The High Buildout Alternative would allow approximately 4.3 million square feet of new greenhouse development.

b. Impact Analysis.

Visual. This alternative would include six additional parcels totaling about 57 acres in the AG-I-CARP zoning. The open space corridor north of Highway 192 and east of Linden Avenue and Carpinteria High School has historically been open field agriculture. However, this area has developed into an emerging greenhouse cluster during the past 10 years with the construction of nearly 1.5 million square feet of greenhouse structures. An additional 1.3 million square feet proposed in the High Buildout Alternative would nearly double the amount of greenhouse

structures within this highly visible open space corridor. Impacts to loss of open space, and visual impacts along public view corridors would be greater for this alternative than the proposed project, however, the impact classification would remain *significant and unavoidable (Class I).*

Although the additional parcels that could be developed with greenhouses are not near sensitive light receptors, overall light and glare effects would incrementally increase as compared to the proposed project. Such impacts are considered *Class II, significant but mitigable.*

Water and Groundwater. This alternative would accommodate about 1.3 million more square feet of greenhouses than the proposed project (about a 37% increase). This increase could cause a similar increase in the discharge of nutrient-rich surface water to the local creek system and to the Carpinteria Salt Marsh. Such discharges have been positively correlated to past greenhouse development. The additional parcels located north of Highway 192 are within the Franklin Creek watershed and would discharge surface runoff into Franklin Creek. Water quality samples (surface water and point source samples) indicate high concentration of nitrogen and other nutrients entering the creek (see Section 5.2). Similar to the proposed project, surface water quality impacts would be *Class II, significant but mitigable*. The High Buildout Alternatives' contribution to cumulative water quality impacts to Carpinteria Marsh would be considered *significant and unavoidable (Class I).*

Groundwater consumption would be greater than the proposed project. Using the 1.6 AFY / acre water demand factor for avocados and the 4.0 AFY / acre water demand factor for cut flowers (chrysanthemums), the potential increase in water use for the High Buildout Alternative would be 237 AFY (2.4 AFY / acre x 99 acres = 237 AFY). While a substantial amount of water, it would not represent a significant impact, as the basin would remain in a state of surplus. Although the increased development potential may incrementally reduce groundwater basin recharge potential, impacts are considered *Class III, adverse but not significant.*

Flooding and Drainage. This alternative would increase the potential for flooding impacts that could be created by the potential 37% increase in impermeable surfaces associated with greenhouse development. Therefore the potential to create additional flooding impacts would also incrementally increase. Such impacts are considered *Class II, significant but mitigable.*

Land Use and Agriculture. This alternative would allow about 37% more greenhouse development than the proposed project by zoning several parcels north of Foothill Road as AG-I-CARP. The additional parcels that could accommodate greenhouses are more than 1,000 feet north of Foothill Road and are not located adjacent to established residential neighborhoods or urban uses. Therefore, expansion of greenhouse uses on these parcels is not likely to result in additional significant conflicts with residential uses. Compatibility impacts and cumulative impact to community character would be slightly greater than those of the proposed project and are still considered *Class I, significant and unavoidable.*

Soils in the additional greenhouse areas are ~~generally not~~ prime and the loss of agricultural soils due to accessory buildings would be mitigated in the same manner as for the proposed project. This alternative is considered similar to the proposed project with regard to agricultural

impacts, which would be *Class II, significant but mitigable.* As with the proposed project, impacts relating to conflicts with agriculture are considered *Class III, less than significant~~, but mitigable~~*.

Traffic and Circulation. The High Buildout Alternative would generate an estimated 1,158 ADT, 129 A.M. PHT and 257 P.M. PHT. This is 336 ADT, 38 A.M. PHT and 74 P.M. PHT more than the proposed project. The 41% increase in daily traffic would increase overall traffic levels throughout the study area. Most of the traffic increases would occur on Route 192 and Casitas Pass Road. The High Buildout Alternative would result in 60 more light to medium truck trip-ends and 17 more large truck trip-ends per average weekday than the proposed project.

As with the proposed project, significant impacts could occur at the Santa Monica / Via Real / U.S. 101 NB ramps and the Linden / U.S. 101 SB off-ramp intersection. Since the timing of proposed improvements is unknown, and funding for these improvements has not been secured, residual impacts would remain *significant and unavoidable (Class I).* The High Buildout Alternative would send additional traffic to the Highway 192 / Cravens Lane intersection, which has a statistically significant collision rate. Until specific intersection improvements are identified and funded, the High Buildout Alternatives' contribution to this existing impact would be considered *significant and unavoidable (Class I).*

Impacts relating to truck operation and sight distance would be somewhat greater than those of the proposed project due to the potentially higher overall volume of traffic and are considered *Class II, significant but mitigable.*

Air Quality. Greenhouse construction under this alternative would cause *Class II, significant but mitigable,* temporary air quality impacts, similar to the proposed project. Although peak daily emissions would be similar to those of the proposed project, overall construction emissions would increase proportionally to the 37% increase in greenhouse building area.

As shown in Table 7-1, this alternative would increase overall vehicle trips by about 41%. A similar increase in mobile source air pollutant emissions. This alternative would also generate increased NOx emissions from greenhouse boilers as compared to the proposed project. However, it would also increase the beneficial impact of reduced particulate emissions associated with the stabilization of the soil surface under greenhouse operations. Significant mobile source emissions are not anticipated from individual greenhouses since emissions of ROG and NO_X would be below the APCD's 25 pounds-per-day threshold for both pollutants. Operational impacts associated with cumulative buildout of greenhouses is considered *adverse, but not significant (Class III)* because emissions would constitute a comparatively small amount of countywide daily emissions (less than 0.1%).

Noise. The additional six parcels that could accommodate greenhouse development under this alternative are located sufficiently distant from sensitive noise receptors that on-site construction activity would not create additional significant noise impacts. However, the potential for significant construction noise impacts remains the same as for the proposed project. Impacts are considered *Class II, significant but mitigable.*

Although additional operational impacts would not occur, greenhouse operations would be located near sensitive residential land uses. Similar to the proposed project, there would be the

potential for nuisance noise problems. This is considered a *Class II, significant but mitigable impact*.

Buildout of this alternative would generate about 41% more overall traffic than the proposed project. Because of the relatively low numbers of vehicle trip generation associated with greenhouse development, cumulative development under the no project alternative would have no significant effect on the current traffic noise levels in the area. The proposed project is estimated to contribute 0.1 dB(A) and 0.3dB(A) increase to cumulative noise levels which is not considered a perceptible noise level increase (minimum 3 dB(A) increase). Construction of this alternative would increase cumulative noise levels, however, the levels are not anticipated to exceed a 3 dB(A) increase. Cumulative traffic-related noise impacts for the High Buildout Alternative are considered *adverse, but not significant (Class III).*

Biological Resources. No significant site specific biological resources are associated with the additional parcels designated for greenhouse development under this alternative; therefore, additional significant site specific impacts would occur. Nevertheless, the increase in the amount of potential greenhouse development may increase the pollutant load of nutrients to the Carpinteria Salt Marsh, which makes this alternative slightly inferior to the proposed project. Impacts relating to increased pollutant and nutrient loads would be slightly greater than those of the proposed project and are considered *Class II, significant but mitigable*. Similarly, impacts relating to alteration of seasonal flow and open space foraging would be somewhat greater than for the proposed project, but are still considered *Class II, significant but mitigable.*

7.3 ALTERNATIVES CONSIDERED BUT REJECTED

As required by CEQA, this section describes alternatives that were considered but ultimately rejected from further consideration.

7.3.1 Greenhouse Construction Moratorium

This alternative assumes that a moratorium on greenhouse development would be imposed for an indefinite time period. The purpose of the moratorium would be to conduct further studies into greenhouse design and mitigation to determine if more or other zoning code changes would be more appropriate than that currently proposed. However, this alternative was ultimately rejected for further consideration because it does not meet the project objective of designating appropriate lands in the Carpinteria Valley for future greenhouse development.

7.3.2 Reduced Lot Coverage

This alternative would apply to all of the proposed AG-I-CARP parcels identified in the project description, but would establish a maximum lot coverage of 35% to 40%. This alternative was ultimately rejected since greenhouse parcels would be developed at a greater pace due to the limited expansion potential. This would likely result in pressure from greenhouse operators to identify additional areas in the valley for expansion. For parcels identified as appropriate for greenhouse expansion (i.e., parcels zoned AG-I-CARP), it is more efficient and economical to operate these facilities with higher structural coverage, rather than at 35-40% coverage which would create a combined farming operation with open field crops grown on the remaining

portion of the property. If this option was applied to the No Project Alternative, large contiguous open field agricultural lands could be fragmented under a combined farming operation, creating smaller open field farms, which may reduce crop flexibility.

7.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

This section evaluates the findings for the proposed project and the four alternatives under consideration. It then identifies the environmentally superior alternative for each issue area, as shown on Table 7-2. If the No Project Alternative is identified as the Environmentally Superior Alternative for a given issue area, the development scenario among the remaining alternatives that produces the fewest impacts is noted, in accordance with CEQA. In addition, the table shows whether each alternative is considered superior (+), inferior (-), or similar to (=) the proposed project for each issue area.

The various buildout scenarios associated with the proposed rezoning would have largely similar types of environmental impacts in that they all involve continued greenhouse development within the study area. The overall potential for impacts under the High Buildout alternative is greater than that for the proposed project but is considered to be superior to the No Project alternative since it would provide for more orderly greenhouse development.

Overall impacts associated with the Low Buildout alternative would be slightly less than the proposed project, particularly in the areas of surface water quality and flooding where the mitigation measures that would be imposed on greenhouse development would either fully mitigate these effects or would potentially result in beneficial effects. The No Project alternative is considered inferior to the proposed project because of the identified impacts that initially resulted in the Greenhouse Program, particularly impacts to visual resources and open field agricultural viability. The **"Low Buildout"** scenario is considered to be superior to the proposed project and has been determined to be **the environmentally preferable alternative**.

Table 7-2. Impact Comparison of Alternatives to the Proposed Project

Type of Impact	Magnitude of Impact (Comparison to Proposed Project) (+ indicates superior to project; = indicates similar; - indicates inferior)			
	Proposed Project	**No Project**	**Low Buildout**	**High Buildout**
Potential greenhouse acreage	462.08		394.33	518.99
Additional greenhouse development allowed (square feet)	3,044,756	4,500,000	2,181,327	4,289,055
5.1 Visual				
VIS-1 Conversion of public viewsheds, open space and agricultural lands	Class I	Class I (-)	Class I (+)	Class I (-)
VIS-2 Light and glare impacts	Class II	Class II (-)	Class II (+)	Class II (=)
Cumulative Impacts	Class I	Class I (-)	Class I (+)	Class I (-)
5.2 Water and Groundwater				
W-1 Degradation of surface water and Groundwater quality with elevated levels of nutrients ~~and pesticides~~ and other materials	Class II	Class II (-)	Class II (+)	Class II (-)
W-2 Degradation of surface water quality of the study area and the Carpinteria Salt Marsh, and the adjacent ocean intertidal zone with elevated levels of stormwater runoff pollutants	Class II	Class II (-)	Class II (+)	Class II (-)
W-3 Degradation of surface water quality with elevated levels of silt/sediment due to construction and reconstruction of greenhouses	Class II	Class II (-)	Class II (+)	Class II (-)
Cumulative Impacts	Class I	Class I (-)	Class I (+)	Class I (-)
5.3 Flooding and Drainage				
F&D-1 Off-site flooding and drainage impacts	Class II	Class II (-)	Class II (+)	Class II (-)
F&D-2 Flooding and erosion impacts on-site and to neighboring properties	Class II	Class II (-)	Class II (+)	Class II (-)
F&D-3 Construction of greenhouse structures in the 100 year flood zone would be susceptible to damage form flooding	Class II	Class II (-)	Class II (+)	Class II (-)
Cumulative Impacts	Class II	Class II (-)	Class II (+)	Class II (-)

Table 7-2. Impact Comparison of Alternatives to the Proposed Project

Type of Impact	Magnitude of Impact (Comparison to Proposed Project) (+ indicates superior to project; = indicates similar; - indicates inferior)			
	Proposed Project	**No Project**	**Low Buildout**	**High Buildout**
5.4 Land Use and Agriculture				
LU/AG-1 Potential land use conflicts with adjoining residential uses	Class I	Class I(-)	Class I(+)	Class I(-)
LU/AG-2 Placement of permanent structures and pavement on prime soils.	Class II	Class II (-)	Class II (+)	Class II (-)
LU/AG-3 Physical changes to the environment that could interfere with or disrupt existing agricultural operations	Class II	Class II (-)	Class II (+)	Class II(-)
Cumulative Impacts	Class I	Class I (-)	Class I (+)	Class I (-)
5.5 Traffic				
T-1 Addition of 822 ADT to study area roadways	Class III	Class III (-)	Class III (+)	Class III (-)
T-2 The project would generate 91 A.M. PHT and 183 P.M. PHT.	Class I	Class I (-)	Class I (+)	Class I (-)
T-3 Project generated traffic may expose persons and property to traffic safety impacts at roadways and intersections	Class I	Class I (-)	Class I (+)	Class I (-)
T-4 The project would generate large trucks on roadways which may necessitate additional roadway structural improvements	Class III	Class III (-)	Class III (+)	Class III (-)
T-5 Congestion Management Plan impacts	Class III	Class III (-)	Class III (+)	Class III (-)
5.6 Air Quality				
AQ-1 Temporary construction emissions	Class II	Class II (-)	Class II (+)	Class II (-)
AQ-2 Incremental reduction in particulate emissions, but increase in ozone precursor emissions	Class III	Class III (-)	Class III (+)	Class III (-)
Cumulative Impacts	Class III	Class III (-)	Class III (+)	Class III (-)

Table 7-2. Impact Comparison of Alternatives to the Proposed Project

Type of Impact	Magnitude of Impact (Comparison to Proposed Project) (+ indicates superior to project; = indicates similar; - indicates inferior)			
	Proposed Project	**No Project**	**Low Buildout**	**High Buildout**
5.7 Noise				
N-1 Temporary construction noise that could be audible at nearby residences	Class II	Class II (-)	Class II (+)	Class II (-)
N-2 Nuisance noise due to the operation of fans and industrial heaters, as well as idling refrigerator trucks	Class II	Class II (-)	Class II (+)	Class II (-)
N-3 Increased traffic-related noise on study area roadways	Class III	Class III (-)	Class III (+)	Class III (-)
Cumulative Impacts	Class III	Class III (-)	Class III (+)	Class III (-)
5.8 Biological Resources				
B-1 Aquatic biological resource impacts due to increased inputs of silt and sediment	Class II	Class II (-)	Class II (+)	Class II (-)
B-2 Impacts to aquatic biological resources due to increased inputs of nutrients or pesticides	Class II	Class II (-)	Class II (+)	Class II (-)
B-3 Accessory uses may cumulatively impact marsh resources form inputs of pollutants carried in stormwater runoff.	Class II	Class II (-)	Class II (+)	Class II (-)
B-4 Changes in runoff patterns may impact biological resources due by altering seasonal flow patterns of creeks	Class II	Class II (-)	Class II (+)	Class II (-)
B-5 Conversion of open field areas to greenhouses may reduce available habitat for foraging and residence.	Class III	Class III (-)	Class III (+)	Class III (-)
B-6 Greenhouse development may cause an indirect and cumulative impact to regional fish and wildlife due to interruption of corridors and linkages.	Class II	Class II (-)	Class II (+)	Class II (-)
Cumulative Impacts	Class I	Class I (-)	Class I (+)	Class I (-)

** Numbers are approximate; buildout is assumed to be equal to the proposed project.*