

ATTACHMENT 2

FINDINGS AND STATEMENT OF OVERRIDING CONSIDERATIONS February 19, 2002

I. PROJECT DESCRIPTION

The project consists of the adoption of the Carpinteria Agricultural Overlay District (CA Overlay) through amendments to the Coastal Zoning Ordinance (Chapter 35, Article II of the Santa Barbara County Code) and the County's Coastal Land Use Plan. The CA Overlay would be applied to all AG-I parcels in the study area. Area A, generally located south of Highway 192 (east of Nidever Road and west of Casitas Pass Road) focuses future greenhouse expansion within and adjacent to historic greenhouse clusters, subject to the provisions of this overlay district. Area A includes a 2.75 million square feet development cap for new greenhouses and greenhouse related development, packing and shipping facilities, and hoop structures (excluding shade structures). Area B encompasses the remainder of AG-I zoned lands, as identified by the Carpinteria Agricultural Overlay District map, and would limit new greenhouses and greenhouse related development, packing and shipping facilities, and hoop structures (excluding shade structures) to less than 20,000 square feet cumulative per legal lot.

The proposed program consists of the following amendments to the Coastal Zoning Ordinance (Article II of Chapter 35 of the Santa Barbara County Code) including:

- a) Amend Division 1, General, Section 35-53 to add a new overlay district (Carpinteria Agricultural (CA) Overlay District);
- b) Amend Division 2, Definitions, Section 35-58, to add definitions for greenhouses and related structures;
- c) Amend Division 4, Zone Districts, to add language to permitted uses in AG-I zone district referring greenhouse development in the Carpinteria Valley to the CA Overlay District;
- d) Amend Division 5, Overlay Districts, to add a new Carpinteria Agricultural (CA) Overlay District (Section 35-102E);
- e) Amend Division 10, Nonconforming, Section 35-162, to add language that would allow nonconforming greenhouse structures to be rebuilt in the event of damage in the CA Overlay District; and
- f) Amend Division 11, Coastal Development Permits, Section 35-169, to allow shade structures 20,000 square feet and greater in the CA Overlay District with the issuance of Coastal Development Permit.

The proposed program also amends various sections of the Coastal Land Use Plan (Section 3.8, Policies 8-5, 8-6 and Section 4.2) to implement the Carpinteria Valley Greenhouse Program.

II. PROCEDURAL HISTORY

The Board of Supervisors finds that the Carpinteria Valley Greenhouse Program and supporting Local Coastal Program Amendments were prepared pursuant to the following processes:

- A. On January 7, 1980, by Resolution No. 80-12, the Board of Supervisors of the County of Santa Barbara adopted the Santa Barbara County Coastal Plan.
- B. In 1986, the document *Greenhouse Development in the Carpinteria Valley: A Compilation and Assessment of Existing Information, 1977-85* was completed. The Board of Supervisors approved this document on March 10, 1986, via Resolution 86-141 as the master environmental assessment required by LCP Policy 8-5. By accepting this study and adopting this resolution, the Board determined that a Development Plan rather than a CUP would be required to process new greenhouse development over 20,000 square feet cumulative. The resolution also included procedures and development standards for commercial greenhouse development in the coastal zone, which were incorporated into a supplemental greenhouse questionnaire that accompanies all County greenhouse applications.
- C. In 1997, the Carpinteria Valley Association (CVA) appealed the County's approval of a 171,000 square foot greenhouse project (Mountain Side Flowers) to the Coastal Commission.
- D. On January 20, 1998, the Board of Supervisors formally directed Planning and Development to address issues related to greenhouse development in the Carpinteria Valley through completion of a study funded by a Coastal Resource Grant (AB 1431) awarded by the State Resources Agency.
- E. In July 1998, the California Coastal Commission denied the appeal filed by CVA; however, they directed the County to require a Conditional Use Permit (CUP) for all new greenhouse development over 20,000 square feet (cumulative) until a cumulative impact analysis is completed and the Coastal Commission formally agrees to any land use designation or policy changes relating to greenhouse development.
- F. In response, the Board of Supervisors adopted Resolution 98-473 requiring a conditional use permit for all greenhouse development of 20,000 square feet (cumulative per parcel) on Agricultural I lands in the Carpinteria Valley until the Carpinteria Valley Greenhouse Program is completed, and the County and Coastal Commission agree on *any* land use or policy changes.
- G. A Notice of Preparation of an Environmental Impact Report was issued on April 22, 1999 for a 30-day agency and public scoping period.

- H. Pursuant to the California Environmental Quality Act Guidelines Section 15060(d), a Draft Environmental Impact Report (99-EIR-02, SCH 99-041114) was released for public review on August 20, 1999. The public review for the Draft EIR closed on October 20, 1999.
- I. In response to public comments, revisions were made and the Proposed Final EIR was released in March 2000, including written responses to comments received on the draft document.
- J. The Planning Commission considered the merits of the Carpinteria Valley Greenhouse Program at public hearings on November 8, 1999, January 19, 2000, March 30, 2000, June 7, 2000, July 17, 2000, August 16, 2000, September 18, 2000 and October 4, 2000. The Planning Commission hearings concluded with no recommendation to the Board of Supervisors. The two motions proposed by the Planning Commission each received split votes (2-2).
- K. The Board of Supervisors considered the Carpinteria Valley Greenhouse Program and proposed Final EIR, including the Planning Commission's motions during public hearings held on February 20, 2001, March 19, 2001, April 24, 2001, August 13, 2001, November 5, 2001 and December 3, 2001. The Board made further modifications to the Program.
- L. On February 19, 2002 the Board of Supervisors adopted the final Carpinteria Valley Greenhouse Program along with related amendments to the County's Coastal Land Use Plan and Article II of Chapter 35 of the County Code. The Board also certified the Final EIR and Revision document dated February 19, 2002 and approved the Mitigation Monitoring and Reporting Plan.

III. PLANNING AND CONSISTENCY FINDINGS

In accordance with County Code Section 35-180.6 of Article II the following findings must be made to approve the Carpinteria Valley Greenhouse Program LCP amendments.

A. The request is in the interest of the general community welfare.

- 1. The Carpinteria Valley is a unique rural agricultural valley along the California coastline, characterized by significant coastal resources, including prime agricultural soils and unique microclimates, coastal streams and wetlands, and sweeping views of the Pacific Ocean and coastal ranges. Carpinteria Valley is among the finest in the State for the production of high-yield specialty crops, including avocados, cut flowers, and nursery stock plants. The extensive interface of urban uses and highly productive agricultural land along the City of Carpinteria northern boundary provides a unique opportunity to preserve and enhance coastal resources.

2. Greenhouse production is a vital component of the County's agricultural base and an important local and statewide economic contributor. Greenhouse development in the Carpinteria Valley has increased over 75% since the Local Coastal Program was certified in 1982: adding an additional 6 million square feet of greenhouse development.
3. The Carpinteria Valley Greenhouse Program is intended to assess the cumulative effects of greenhouse development, greenhouse related development, and packing and shipping facilities on coastal resources, designate appropriate lands in the Carpinteria Valley for future such development and provide development standards by which land use and other environmental impacts resulting from construction and operations of such development would be minimized. In addition, the Carpinteria Valley Greenhouse Program seeks to encourage the retrofitting and reuse of aging greenhouse structures while promoting and enhancing the continuation of open field agriculture in the Carpinteria Valley.

The Carpinteria Valley Greenhouse Program establishes the Carpinteria Agricultural Overlay District (CA Overlay) and designates geographic areas of AG-I zoned lands in the Carpinteria Valley appropriate to support future greenhouse development, greenhouse related development and packing and shipping facilities and to designate areas appropriate for the preservation of open field agricultural uses. The intent is to ensure well-designed greenhouse development and to limit the loss of open field agricultural areas from piecemeal greenhouse and packing and shipping facility expansion by providing well-crafted development standards that protect the water quality, visual resources and rural character of the Carpinteria Valley. To achieve these goals the CA Overlay demarcates the project area into Area A and Area B. Area A encompasses AG-I zoned lands, primarily south of Highway 192 between Nidever Road and Linden Avenue, while Area B includes the remainder of AG-I zoned lands in the project area. The CA Overlay establishes a development cap of 2.75 million square feet for future expansion of greenhouses, greenhouse related development, hoop structures (excluding shade structures), and packing and shipping facilities in Area A. Area B limits new greenhouses, greenhouse related development, hoop structures (excluding shade structures), and packing and shipping facilities to 20,000 square feet cumulative per legal lot.

Area A was selected as the expansion area for several reasons. The Carpinteria Valley Greenhouse Program is intended to direct the majority of greenhouse and greenhouse related development within and adjacent to historic greenhouse clusters as infill within Area A while ensuring the continuation of open field agriculture, which is more heavily concentrated in Area B. The criteria to establish a rational basis for determining parcel suitability for greenhouse expansion included:

- Proximity to existing historic greenhouse clusters (i.e., south of Highway 192);
- Parcel visibility;
- Distance from adjacent incompatible land uses (i.e., residences, schools);
- Distances from water courses and riparian corridors;
- Parcel size; and
- Existing agricultural use.

The CA Overlay Area A is consistent with the above expansion criteria and creates a defined, logical greenhouse expansion boundary that facilitates and supports greenhouse development within and adjacent to historic greenhouse clusters balanced with the protection of unique coastal resources and preservation of the semi-rural character of the Carpinteria Valley.

4. Construction of greenhouses, greenhouse related development, hoop structures, and packing and shipping facilities adjacent to public view corridors often obstructs foreground, mid-ground and background views of open space lands, and changes in the rural character of the area associated with building masses, parking lots, and warehouses which can have an industrial appearance. The CA Overlay establishes additional restrictions on future expansion of greenhouses, greenhouse related development, hoop and structures, and packing and shipping facilities within designated view corridors in Area A to minimize impacts to public views and fragmentation of large blocks of contiguous open field agricultural land. These restrictions include: 25% maximum lot coverage, 25 foot absolute building height, 250 foot setback from public right-of-way, as well as clustering the development to the maximum extent feasible.

Area A parcels subject to the CA Overlay District view corridor requirements include the following Assessor Parcel Numbers:

005-310-013
005-310-019
005-430-007
005-430-032
005-430-048
005-430-049
005-430-056
005-430-057
004-002-026
004-002-027
004-002-029

The Board-approved process and criteria in the County's *Environmental Thresholds and Guidelines Manual* (1995) were followed in designating these parcels within the view corridors. Key factors used to assess the visual resources of a site include the physical attributes of the site, its relative visibility and its

- relative uniqueness. Areas of particular visual importance include coastal and mountain views, the urban fringe, and travel corridors.
5. The CA Overlay establishes new development standards and submittal requirements in the Overlay District to limit impacts to coastal resources, including visual resources, water quality, biological resources, flooding and drainage, and traffic and circulation.
 6. The CA Overlay recognizes the importance of greenhouse agriculture to the local, County, and statewide economy by including provisions that recognize legally permitted greenhouse development as conforming uses within the overlay district. The CA Overlay also includes an amnesty program allowing existing unpermitted greenhouse development to be legalized through application for a development permit if such structures conform to the provisions of the overlay district. Structures that become legalized during the Amnesty period (two years from date of program adoption) will not be counted towards the development cap in an effort to recognize and support the significant contribution of greenhouses to the local, county, and statewide agricultural economy.
 7. The Carpinteria Valley Greenhouse Program establishes provisions that would allow non-conforming greenhouse structures and packing and shipping facilities within the Overlay district to be rebuilt in the event of damage.
 8. The CA Overlay development cap does not apply to shade structures. By definition, shade structures consist of a frame with no permanent structural elements (e.g. footings, foundations, plumbing, electrical wiring, etc.), and an impermeable, removable covering used to protect plants grown in the soil or in containers upon the soil, with a maximum height of no greater than 12 feet above natural grade. These features contribute to shade structures having less of an overall impact when compared to greenhouses, greenhouse related development, hoop structures, and packing and shipping facilities, with respect to land use and related land use compatibility conflicts, noise, traffic, water quality, flooding and drainage, air quality, and visual impacts.
 9. The Carpinteria Valley Greenhouse Program amends Article II, Section 35-169.2 (Coastal Development Permit) to allow shade structures 20,000 square feet or greater within the CA Overlay District with only a coastal development permit, rather than the current coastal zone requirement for approval of a development plan. Shade structures would be subject to all applicable CA Overlay District development standards (required for CDP's), Coastal Development Permit findings, and would be restricted to 25% lot coverage. The maximum lot coverage requirement is consistent with their historic construction and use as an accessory agricultural structure in the Carpinteria Valley. The Coastal Development Permit would also reduce the time and cost associated with the permit process.

These changes recognize the value of shade structures in promoting crop flexibility, and their historic use in the Carpinteria Valley as an important accessory agricultural structure supporting both open field and greenhouse agriculture.

10. The maximum lot coverage requirement (e.g. 65%-75% maximum lot coverage) has been eliminated for greenhouse development with the CA Overlay to maximize clustering of greenhouse development on individual lots and limit the fragmentation of contiguous blocks of open field agriculture. Development standards and setback requirements in the CA Overlay have been strengthened to provide adequate screening opportunities and reduce land use compatibility issues. The CA Overlay retains the maximum 25% lot coverage requirement for parcels within designated view corridors.
11. The Carpinteria Valley Greenhouse Program balances resource protection issues by limiting future greenhouse development primarily to CA Overlay District “Area A” within and adjacent to existing historic greenhouse clusters south of Highway 192 between Nidever Road and Linden Avenue. Area A provides a logical greenhouse expansion boundary for the continuation of highly productive coastal agriculture opportunities, while preserving the scenic values and rural character of the Carpinteria Valley. CA Overlay District “Area B” provides standards that support open field agriculture as a viable, long-term agricultural use by limiting greenhouse development and intensive infrastructure improvements.

Area B north of Route 192, between Carpinteria High School and Carpinteria Creek, has historically been open field agriculture. This area is highly visible from Route 192 and is a gateway to the rural agricultural lands that encompass the eastern Carpinteria Valley. However, this area has developed into an emerging greenhouse cluster area with the construction of approximately 1.5 million square feet of greenhouse development since 1989. This area was included in Area B to minimize fragmentation of large blocks of remaining open field agriculture, and to avoid significant visual impacts and changes to the rural character of Carpinteria Valley.

B. The request is consistent with the Comprehensive Plan, Coastal Land Use Plan, and the requirements of State planning and zoning laws and Article II – Coastal Zoning Ordinance.

1. The Carpinteria Valley Greenhouse Program has been determined to be consistent with all applicable polices of the Comprehensive Plan. The Land Use Element and Agricultural Element contain a number of policies requiring the preservation of agriculture, maintaining prime soils in agricultural uses, maintaining a stable urban-rural boundary and preserving the agricultural economy and the semi-rural qualities of the area. The Ordinance Amendments retain agricultural zoning for all lands currently zoned for agriculture in the Carpinteria Valley and retain the Comprehensive Land Use Designation of Agriculture.

Planning for orderly development involves numerous and sometimes competing land use, economic, and environmental factors. Agricultural Element Goal I and Goal I.B. emphasize the enhancement and continuation of agriculture as a major industry in Santa Barbara County, and recognize the rights of operation and freedom of choice of cultivation methods within the traditional scope of agricultural management decisions. Goal I of the Agricultural Element also acknowledges that intensified agricultural uses must be conducted in a manner that considers applicable resource protection policies and regulations and takes into account environmental impacts. The Carpinteria Valley Greenhouse Program balances these resource protection issues by limiting future greenhouse development to specific parcels and adoption of new development standards, while allowing the continuation of highly productive coastal agricultural operations.

2. The Program is consistent with all applicable local Coastal Land Use Plan policies. Coastal Land Use Plan 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. The EIR determined that greenhouse development would result in significant visual impacts and a significant change in the rural, agricultural character of the Carpinteria Valley due to the scale and design of greenhouse development. However, the LCP also includes several policies that call for the protection and continuation of agriculture as a coastal resource of local and regional importance.

Mitigation measures have been included in the Carpinteria Valley Greenhouse Program to address visual impacts through reduction of light and glare, landscape screening requirements, as well as height and setback restrictions which further the compatibility of greenhouses with the surrounding area. Greenhouses are typically built on relatively flat land, they follow the natural contours of the land. The Carpinteria Valley Greenhouse Program is therefore consistent with LCP Policy 4-3

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 resources and open space protection, the agricultural economy and semi-rural qualities of the area, and service and infrastructure capacities. The proposed project attempts to harmonize these resource protection issues by limiting future greenhouse development to specific parcels, which are primarily located within or adjacent to historic greenhouse clusters.

The maximum lot coverage requirement has been eliminated within the CA Overlay to balance visual resource concerns on an area-wide scale by maximizing greenhouse development on a fewer number of suitable greenhouse expansion parcels, thereby limiting pressure to expand future greenhouse development into

highly productive open field agricultural lands. In addition, new development standards and increased setbacks will provide improved landscape screening to minimize site-specific and cumulative visual impacts. The CA Overlay establishes a 2.75 million square foot development cap on new greenhouses, greenhouse related development, hoop structures, and packing and shipping facilities in Area A (excluding shade structures).

3. State planning and zoning law requires that the project be consistent with the Comprehensive Plan. The Ordinance Amendments retain a permit approval process that requires consistency with the County's Comprehensive Plan and Coastal Land Use Plan. Therefore, the program is consistent with the plans and policies contained in the various elements of the Comprehensive Plan and the Coastal Land Use Plan.
4. The amendments to Article II include the definitions of greenhouse, greenhouse related development, and shade and hoop structures to clarify the language and requirements of the CA Overlay.
5. The Ordinance Amendments are consistent with State planning and zoning law and Article II of Chapter 35 of the County Government Code.

C. The request is consistent with good zoning and planning practices.

1. The proposed Carpinteria Valley Greenhouse Program is intended to direct and facilitate orderly community development by providing certainty on where future greenhouses, greenhouse related development, hoop and shade structures, and packing and shipping facilities will occur. The program serves to guide development to appropriate areas and reduces environmental impacts of future development, thereby reducing permitting and environmental review time and costs. Criteria for determining the suitability of expansion of greenhouses, greenhouse related development, hoop structures, and packing and shipping facilities include: proximity to existing historic greenhouse clusters, parcel visibility from public view corridors, distance from adjacent incompatible uses (e.g. residences, schools, etc.), distance from water courses, existing crop type, and parcel size.
2. The proposed CA Overlay designates two geographic areas (Area A and Area B) of AG-I zoned land in the Carpinteria Valley for future development of greenhouses, packing and shipping facilities, hoop structures, and greenhouse related development. The Carpinteria Valley Greenhouse Program balances resource protection issues by limiting future greenhouse development primarily to CA Overlay District "Area A" within and adjacent to existing historic greenhouse clusters south of Highway 192 between Nidever Road and Linden Avenue. Area A provides a logical greenhouse expansion boundary for the continuation of highly productive coastal agriculture opportunities, while preserving the scenic

values and rural character of the Carpinteria Valley. CA Overlay District “Area B” provides standards that support open field agriculture as a viable, long-term agricultural use by limiting greenhouse development and intensive infrastructure improvements. The geographic boundary of Area A was determined through good land use planning rationale as a means to avoid piecemeal expansion of greenhouses, packing and shipping facilities and other greenhouse related development in areas less appropriate for such expansion.

3. The Carpinteria Valley Greenhouse Program has been prepared pursuant to good land use planning and zoning practice, and is consistent with state planning and zoning law, the Santa Barbara County Comprehensive Plan, Local Coastal Program, and California Coastal Act.

IV. CEQA FINDINGS: GENERAL

- A. The EIR for this project has been prepared as a Program EIR pursuant to CEQA Guidelines Section 15168. The degree of specificity in the EIR corresponds to the specificity of the general or program level policies, actions, and development standards of the Program and to the effects that may be expected to follow from its adoption. The EIR is not as detailed as an EIR on a specific development project or implementation program that might follow.
- B. CEQA requires analysis not only of potential direct impacts, but also of potential indirect or secondary effects, which the proposed project may reasonably cause, even though later in time or farther removed in distance. In light of these principles, the EIR discusses and classifies the potential indirect, secondary effects arising from the Program specifically and from cumulative and regional development that may subsequently occur during the life of the Program.
- C. The Program mitigates the environmental impacts to the maximum extent feasible as discussed in the findings made below. Where feasible, changes and alterations have been incorporated into the Program that are intended to avoid or substantially lessen the significant environmental effects identified in the EIR.
- D. Changes to the Project Description do not change the conclusions of the EIR.
- E. The EIR identifies and analyzes a range of reasonable alternatives, however sites outside of the Carpinteria Valley are not evaluated for potential future greenhouse expansion. The range of alternatives addressed in the proposed FEIR focus upon agriculturally designated lands within the Carpinteria Valley. The Project objectives and range of EIR 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. Alternative

sites would not meet this objective. In addition, greenhouses are considered agriculture and therefore suitable on agricultural lands if appropriately sited.

- F. The EIR evaluates the impacts of greenhouse expansion in the Carpinteria Valley, however it does not analyze the impacts of continued open field agriculture in the Carpinteria Valley. The impacts of open field agriculture are considered part of the baseline data and existing conditions. CEQA Guidelines Section 15125 states: “An EIR must include a description of the physical environmental conditions in the vicinity of the project as they exist at the time the notice of preparation is published...this environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.” The baseline physical conditions within the study area are a product of both the natural environment and the built environment, including the extent of greenhouse and open field agricultural production throughout the study area. The baseline also consists of the existing zoning designations and zoning ordinances and the impacts associated with the continuation of these designations and ordinances. Potential impacts of the proposed project are measured against these baseline physical conditions to determine whether an impact is significant. Open field agriculture in the study area is a preexisting condition that will remain unchanged in the proposed CA Overlay. Any additional agricultural expansion would occur with or without the proposed project on steeper slopes that are unsuitable for greenhouse development. Greenhouse development consisting of less than 20,000 square feet cumulative per legal lot is allowed by the existing zoning ordinances if a Coastal Development Permit is attained; these zoning ordinance provisions are not proposed for amendment.
- G. The EIR identified numerous mitigation measures designed to reduce potentially significant impacts that might occur from development under the Program. During the process of incorporating these mitigation measures into the Program, several types of actions or determinations were taken. These fall into five basic categories:
1. The mitigation measure has been directly incorporated in a goal, policy, action, program, or development standard within the Program;
 2. The mitigation measure has been subsumed into or is covered by another goal, policy, action, program, or development standard in the Program;
 3. The intent of the mitigation measure was already covered by existing policies or practices, including but not limited to those of the County, APCD, and Flood Control District;
 4. The mitigation measure was not included in the Program because it was considered to be infeasible;
 5. The mitigation measure was modified.

These actions and determinations did not reduce the effectiveness of the mitigation; rather they helped to clarify, reduce redundancies, and/or increase the efficacy of the measures.

- H. The Board of Supervisors of the County of Santa Barbara has examined the Proposed Final EIR (99-EIR-02) dated March 2000, and EIR Revision Document (99-EIR-02 RV1) dated February 19, 2002, and finds that these documents have been prepared in compliance with the requirements of CEQA; and hereby certifies that these documents together constitute a complete, accurate, adequate, and good faith effort at full disclosure under CEQA, and reflect the independent judgment of Board of Supervisors.
- I. The documents and other materials that constitute the record of proceedings upon which this decision is based are in the custody of the Clerk of the Board of Supervisors at 105 East Anapamu Street, Santa Barbara, California 93101.
- J. A Mitigation Monitoring and Reporting Program for the Carpinteria Valley Greenhouse Program has been adopted pursuant to the requirements of Public Resources Code Section 21081.6, to ensure implementation of the adopted mitigation measures to reduce significant effects on the environment, and is included in the Revisions to the FEIR (99-EIR-02 RV1) dated February 19, 2002.

V. FINDINGS THAT CLASS I SIGNIFICANT UNAVOIDABLE IMPACTS ARE MITIGATED TO THE MAXIMUM EXTENT FEASIBLE

The EIR for this project identifies numerous potentially significant environmental impacts, which cannot be fully mitigated and are therefore considered unavoidable. Those impacts are related to Visual Resources, Land Use, and Traffic. To the extent these impacts remain significant and unavoidable, such impacts are acceptable when weighed against the overriding social, economic, legal, technical, and other considerations set forth in the Statement of Overriding Considerations, included as Section VIII of these Findings. The “Class I” impacts identified in the EIR are discussed below, along with the appropriate findings as per CEQA Guidelines Section 15091.

A. Visual Resources

Impacts. The EIR identified significant visual impacts on public views including the loss of foreground, mid-ground, and background views of open space lands, and changes in the rural character of the area associated with building masses, parking lots, and warehouses which can have an industrial appearance. Visual impacts would occur due to the outward expansion of greenhouse development beyond historic greenhouse cluster areas primarily located south of Highway 192 between Nidever Road and Linden Avenue (Impact VIS-1).

Mitigation Measures. The EIR identified mitigation VIS-1, VIS-3, VIS-5, VIS-6, VIS-7, and VIS-9, which would serve to partially mitigate Impact VIS-1 and other impacts to visual resources. Some Visual Resources impacts can be partially mitigated through development design and through conditions imposed on new development projects, particularly through the application of Development Standards contained in the CA Overlay. These mitigation measures have been wholly or partially incorporated into the Project along with additional development standards, as follows:

DevStd-1 A landscaping plan shall be required which provides, to the maximum extent feasible, visual screening of all structures and parking areas from all adjacent public roads and view corridors. The landscape plan shall include the following:

- a. The landscaping plan shall consist of plants which will reasonably screen the development within 5 years and which are compatible with the surrounding visual character of the area.
- b. Landscaping within front setbacks shall gradually increase in height away from public roadways. Solid wall fencing shall not be relied upon as a primary means of screening. Solid wall or dark chain-link security fencing shall be screened from public view corridors by dense landscaping and/or covered with attractive climbing vines.
- c. Where structures are proposed in existing orchards or adjacent to wind rows, perimeter trees shall be preserved to the maximum extent feasible in order to provide visual screening along adjacent public roadways. Remnant orchard trees shall be maintained in good condition to ensure that trees do not become hosts for pests or diseases.

Landscaping shall be maintained for the life of the project. The applicant shall post a performance security to ensure that landscaping provides adequate screening within five (5) years. If landscaping is removed or substantially altered, a revised landscape plan shall be submitted to P&D for substantial conformity review with the original conditions of approval and replacement landscaping shall be installed and maintained.

DevStd-7 Exterior lighting shall be for specific safety purposes only and shall be hooded/shielded to minimize the spread of light off-site and to minimize impacts to the rural nighttime character.

DevStd-8 To the extent feasible, new greenhouse development and packing and shipping facilities shall be oriented with the roof axis aligned from north to south to reduce glare impacts.

DevStd-14 Packing and distribution facilities shall be subject to BAR review. The size, height, design, and appearance shall be compatible with the rural character of the area.

DevStd-15 To the maximum extent feasible, packing and distribution facilities, loading docks, and delivery bays associated with greenhouse development shall be centrally located within individual greenhouse operations. When any packing and distribution facilities are centrally located, the driveway to reach such a facility shall not be counted toward the CA Overlay development cap. Idling of trucks shall be prohibited between the hours of 9:00 p.m. and 7:00 a.m. A minimum 100-foot setback shall be maintained between loading/unloading areas, driveways and parking areas and adjacent residential properties unless it can be determined that shielding or other measures can provide sufficient attenuation to reduce noise at the property line to less than 65 dB(A) CNEL.

DevStd-16 All new or retrofit greenhouse or plant protection structures shall include a mechanized blackout screen system within growing areas to prevent interior night lighting from being visible outside the structure. If the applicant does not intend to use night lighting, the project description for individual greenhouse projects shall clearly state that night lighting within growing areas shall not occur.

Findings. The Board finds that the intent of Mitigation Measures VIS-1, VIS-3, VIS-5, VIS-6, VIS-7 and VIS-9 to lessen the impacts of new greenhouse development and associated structures on public views is reflected in the previously-cited Development Standards, which will be implemented as new packing and shipping facilities, greenhouses and greenhouse related development occurs. The Board also finds that the intent of the mitigation measures is reflected in the provisions of the CA Overlay and ordinance requirements, including limitations on greenhouse development to Area A (south of Highway 192) and largely restricting development to within and adjacent to historic greenhouse cluster areas. Limitations on greenhouses related development, and packing and shipping facilities in identified view corridors to 25% maximum lot coverage, a maximum absolute height of 25 feet and increased setback requirements as required by the CA Overlay and ordinance are also found reflected in the intent of the visual resources mitigation in the FEIR. Mitigation Measure VIS-10 (65% maximum lot coverage) has not been included because the Board finds that that the aforementioned mitigation measures and development standards as well as the setback requirements in the CA Overlay are sufficient to address potential site specific impacts to visual resources. .

The Board finds that the mitigation measures and related CA Overlay and ordinance requirements are consistent with the polices described in Chapter 4, Section 4.3.2 (Visual Resources and Aesthetics) of the FEIR. Consistency with LCP Policies 4-2 and 8-7 is achieved through the landscaping requirements in DevStd-1 and Mitigation Measures VIS-1, VIS-3, VIS-5 and VIS-7. Consistency with PRC Section 30251 and LCP Policy 4-3 is achieved through DevStd-14 and DevStd-15; CA Overlay setback and height restrictions, development restrictions in designated view corridors; as well as CA Overlay provisions designating Area A as the primary greenhouse development expansion area.

The Board finds that residual significant impacts are acceptable due to the overriding considerations that support adoption of the Program, discussed in Section VIII. Some

impacts related to visual resources have been mitigated to levels of insignificance, as discussed in Section VI.A of these Findings.

B. Water Quality and Groundwater

Impacts. The FEIR identified cumulative impacts to water quality and groundwater associated with greenhouse expansion. Cumulative development within the Carpinteria Valley may cause an increase in the amount of pollutants discharged to the local creeks, other receiving water bodies (i.e. Carpinteria Salt Marsh), groundwater and the adjacent ocean intertidal zone. In addition, future cumulative construction activity may increase the amount of sediment eroded, transported in the creeks, and deposited either in the Carpinteria Salt Marsh or along the ocean intertidal zone. Significant cumulative impacts would result from the inability to regulate non-point source pollution from existing cultivation and cumulative projects within the City of Carpinteria and throughout the study area, combined with additional point and non-point source pollution from buildout of the proposed project.

Mitigation. The EIR identified mitigation W-1, W-2, W-3, W-4, W-5, W-6, and W-7, which would serve to partially mitigate cumulative impacts to water quality and groundwater. These have been incorporated into the Project. The Board finds that additional mitigation has been incorporated into the Project in the following development standards.

DevStd-3 Where wastewater flows from new greenhouse development and packing and shipping facilities are proposed to be disposed through private septic system, adequate undeveloped area shall be maintained to accommodate the septic system components, including 100% expansion areas, and required setbacks from buildings, property lines, wells, storm water retention facilities, streams, etc. No development shall be placed above the septic system components.

DevStd-4 Compost, fertilizer and pesticides shall be stored in a manner that minimizes generation of leachate. Leachate controls include covering compost piles and fertilizer storage with a roof and locating storage areas outside of the 100-year flood plain. Uncovered storage areas shall be located at least 250 feet from a waterway (i.e., storm drain, creek, salt marsh or ocean) unless it can be demonstrated that no adverse effect on water quality will result. Should any discharge occur that could impair the water quality of the receiving body, then a discharge permit will be required from the Regional Water Quality Control Board.

DevStd-5 The Carpinteria-Summerland Fire Protection District shall review and approve storage areas for pesticides, herbicides and fertilizers. Storage areas shall be designed with the following mandatory components, and or other requirements deemed necessary by the District:

- a. A low berm shall be designated around the interior floor to prevent migration of materials in the event of a spill. Any spilled material shall be disposed of in accordance with Carpinteria-Summerland Fire Protection District requirements.

- b. The floor shall be a concrete slab.
- c. The berm shall be designed to provide 100% containment of any stored liquids.
- d. In the event that storage, handling or use of hazardous materials within the provisions of AB 2185/2187 occurs on site, the applicant shall implement a Hazardous Materials Business Plan (HMBP).

DevStd-6 High saline brines shall not be discharged to the storm drain or allowed to percolate into the groundwater unless it can be demonstrated that no adverse effect on water quality will result. Waste brine shall be contained and disposed of in accordance with federal, state, county and local regulations and requirements. Should any discharge occur that could impair the water quality of the receiving body, then a discharge permit will be required from the Regional Water Quality Control Board.

DevStd-10 To the maximum extent feasible, vegetative cover shall be provided in areas of non- structural development to encourage storm water infiltration and reduce runoff from hardscaped areas. The use of open field crops should be encouraged to keep non-greenhouse areas in production.

DevStd-20 Applicants shall prepare a Water Quality Management Plan for review and approval by Planning and Development and consultation by Environmental Health and Safety, the Regional Water Quality Control Board and the Carpinteria Valley Water District. The Water Quality Management Plan shall consist of the following components:

- a. A flow diagram of the proposed water system to be used, including average and maximum daily flows.
- b. The mapped location of all existing and proposed surface and sub-surface drainage facilities.
- c. Information on water and nutrient delivery systems.
- d. Pesticide Best Management Practices as defined and required by the County Agricultural Commissioner.
- e. The location and type of treatment and disposal facilities for irrigation, washwater, boiler blowdown, water softener regeneration brines, and retention basins.
- f. Best Management Practices (BMPs), including but not limited to the following:
 - i) Use of water systems that minimize surface water transport (i.e., trickle, drip, mist, hydroponic irrigation systems).
 - ii) Use of water and nutrient recycling technologies.
 - iii) Employment of fertilization methods that maximize the efficiency of nutrient delivery and uptake such as controlled-release fertilizers (CRF) or liquid fertilizer (LF).
 - iv) Implementation of Integrated Pest Management techniques.

Should any discharge occur that could impair the water quality of the receiving body, then a discharge permit will be required from the Regional Water Quality Control Board

DevStd-21 Irrigation Water Detention System: If deemed necessary by Planning and Development, in consultation with the Regional Water Quality Control Board, to further reduce potential water quality impacts, all excess surface irrigation process water shall be collected and routed to a sealed bottom, irrigation water detention basin. The detention basin shall function as a water bank during low rainfall periods (i.e. May to November) for water conservation and reuse. The irrigation water detention basin shall be separate from and not connected to any required flood control retention basin. The irrigation water detention basin shall be designed in accordance with Santa Barbara County Flood Control and Water Conservation District requirements.

DevStd-22 Applicants shall reimburse the Carpinteria Valley Water District (CVWD) for costs related to additional groundwater testing and reporting as deemed necessary by CVWD, pursuant to adopted criteria, to monitor nitrate loading of groundwater caused by applicant's development. Said costs may also include those caused by the installation of monitoring wells deemed necessary by CVWD. All monitoring data and reports prepared by CVWD shall be submitted as public record to the CVWD Board of Directors and the County Planning & Development Department. Nitrate loading found to be in excess of District standards, as a result of the groundwater testing by CVWD, shall cause a subsequent review of the greenhouse facility and operations by CVWD, in consultation with Planning & Development. All subsequent review costs shall be paid for by the applicant

Findings. The Board finds that the intent of Mitigation Measures W-1, W-2, W-3, W-6, and W-7 to lessen the cumulative impacts of new greenhouse development, related development and packing and shipping facilities on water quality and groundwater is reflected in the previously-cited Development Standards, which will be implemented as new packing and shipping facilities, greenhouses and related development occurs. The Board finds that Mitigation Measures W-4 and W-5 are incorporated in Coastal Land Use Plan Policy 8-5(h) and (i) to address sources contributing to cumulative water quality impacts and to provide for the long-term protection of the ecological functions and values of the Carpinteria Salt Marsh and its coastal stream tributaries. The Board finds that residual significant impacts are acceptable due to the overriding considerations that support adoption of the Program, discussed in Section VIII. Some impacts related to water quality and groundwater have been mitigated to levels of insignificance, as discussed in Section VI.A of these Findings.

C. Land Use and Agriculture

Impacts. The FEIR identified significant nuisance impacts caused by land use conflicts between new greenhouses, related development, and packing and shipping facilities adjacent to residential uses that could, in turn, result in potentially significant impacts (Impact LU/AG-1). When viewed cumulatively, the development of 2.75 million square feet of greenhouse structures, combined with these nuisance impacts, can result in a greater degree of impacts than would occur individually, particularly in terms of community character and overall quality of life.

Mitigation Measures. Some land use impacts can be partially mitigated through development design and through conditions imposed on new development projects, particularly through the application of Development Standards contained in the CA Overlay. The EIR identified mitigation LU/AG-1, LU/AG-2, and LU/AG-3, which would serve to partially mitigate Impact LU/AG-1 and other impacts to land use and agriculture. These measures have been incorporated into the Project. The Board finds that additional mitigation has been incorporated into the Project in the following development standards.

DevStd-1 A landscaping plan shall be required which provides, to the maximum extent feasible, visual screening of all structures and parking areas from all adjacent public roads and view corridors. The landscape plan shall include the following:

- a. The landscaping plan shall consist of plants which will reasonably screen the development within 5 years and which are compatible with the surrounding visual character of the area.
- b. Landscaping within front setbacks shall gradually increase in height away from public roadways. Solid wall fencing shall not be relied upon as a primary means of screening. Solid wall or dark chain-link security fencing shall be screened from public view corridors by dense landscaping and/or covered with attractive climbing vines.
- c. Where structures are proposed in existing orchards or adjacent to wind rows, perimeter trees shall be preserved to the maximum extent feasible in order to provide visual screening along adjacent public roadways. Remnant orchard trees shall be maintained in good condition to ensure that trees do not become hosts for pests or diseases.

Landscaping shall be maintained for the life of the project. The applicant shall post a performance security to ensure that landscaping provides adequate screening within five (5) years. If landscaping is removed or substantially altered, a revised landscape plan shall be submitted to P&D for substantial conformity review with the original conditions of approval and replacement landscaping shall be installed and maintained.

DevStd-7 Exterior lighting shall be for specific safety purposes only and shall be hooded/shielded to minimize the spread of light off-site and to minimize impacts to the rural nighttime character.

DevStd-8 To the extent feasible, new greenhouse development and packing and shipping facilities shall be oriented with the roof axis aligned from north to south to reduce glare impacts.

DevStd-11 Stationary construction equipment that could generate noise exceeding 65 dB(A) CNEL at property boundaries shall be shielded to County P&D's satisfaction and, where feasible, shall be located a minimum of two hundred (200) feet from sensitive receptors.

DevStd-12 Industrial fans and heaters for all greenhouses, greenhouse related development and packing and shipping facilities shall be designed such that external sound levels do not exceed 65 dB(A) CNEL at the property line. Such equipment shall not be located on greenhouse walls that face adjacent existing residences. To ensure that this maximum sound level is not exceeded, acoustical analyses shall be conducted prior to zoning clearance or at the time of discretionary approval of individual greenhouses, greenhouse related development and packing and shipping facilities, and follow-up noise monitoring shall be conducted at least twice during the first year of greenhouse operation. If noise levels from greenhouse equipment are found to exceed 65 dB(A) CNEL at the property line, adjustments shall be made to ensure compliance with this requirement.

DevStd-13 Noise associated with paging and/or broadcasting of music over speakers within greenhouses, related structures and packing and shipping facilities shall be limited to levels that are not audible at the property line.

DevStd-14 Packing and distribution facilities shall be subject to BAR review. The size, height, design, and appearance shall be compatible with the rural character of the area.

DevStd-15 To the maximum extent feasible, packing and distribution facilities, loading docks, and delivery bays associated with greenhouse development shall be centrally located within individual greenhouse operations. When any packing and distribution facilities are centrally located, the driveway to reach such a facility shall not be counted toward the CA Overlay development cap . Idling of trucks shall be prohibited between the hours of 9:00 p.m. and 7:00 a.m. A minimum 100-foot setback shall be maintained between loading/unloading areas, driveways and parking areas and adjacent residential properties unless it can be determined that shielding or other measures can provide sufficient attenuation to reduce noise at the property line to less than 65 dB(A) CNEL.

DevStd-16 All new or retrofit greenhouse or plant protection structures shall include a mechanized blackout screen system within growing areas to prevent interior night lighting from being visible outside the structure. If the applicant does not intend to use night lighting, the project description for individual greenhouse projects shall clearly state that night lighting within growing areas shall not occur.

DevStd-18d. Driveway access design shall ensure compliance with state and county sight distance requirements and safely accommodate truck maneuvers. Driveway access improvements shall not inhibit or diminish the effectiveness of required landscape mitigation. To the maximum extent feasible, the design and scale shall be consistent with the rural character of the area.

Findings. The Board finds that the intent of Mitigation Measure LU/AG-2 to lessen the impacts of new greenhouse development, related development, and packing and shipping facilities on adjacent residential uses is reflected in the previously-cited Development

Standard 1 which will be implemented as development of new greenhouses, packing and shipping facilities, and greenhouse related development occurs. Mitigation Measures LU/AG-1 and LU/AG-3 have been incorporated into the requirements of the Agricultural Overlay as described in the Greenhouse Program. The Board finds that the above sited development standards mitigate land use compatibility impacts to the maximum feasible extent, and that residual significant impacts are acceptable due to the overriding considerations that support adoption of the Program, discussed in Section VIII.

D. Traffic

Impacts. The EIR identified significant impacts resulting from project-generated traffic contributing to A.M. and P.M. peak hour congestion at the Santa Monica/Via Real/U.S. 101 northbound ramp intersection and the Linden/U.S. 101 southbound off-ramp intersection (Impact T-2). These intersections are currently at, and are forecasted to exceed acceptable levels of service. Project buildout would add to the service level degradations. Project-generated traffic may also expose persons and property to potentially significant traffic safety impacts along area roadways and intersections (Impact T-3).

Mitigation Measures. Some traffic impacts can be partially mitigated through development design and through conditions imposed on new development projects, particularly through the application of Development Standards contained in the CA Overlay and implementation actions contained in the Coastal Land Use Plan. The EIR identified mitigation T-1, T-2, T-3, T-4, T-5, T-6, T-7, T-8, T-9, and T-10, which would serve to partially mitigate Impacts T-2 and T-3 and other impacts to traffic. These measures were incorporated into the Project. The Board finds that additional mitigation has been incorporated into the Project in the following development standards.

DevStd-18 The Traffic Management Plan shall consist of the following components:

- a. A focused traffic analysis that identifies truck size and the number of new peak hour trips the project will send to the Santa Monica/Via Real/U.S. Highway 101 northbound ramp interchange and the Linden Avenue/U.S. Highway 101 southbound ramp interchange.
- b. Preferred truck routes, with specific information given to drivers prior to entering the Carpinteria Valley.
- c. Information regarding approach and exit speeds, turning movements, hours of delivery, etc.
- d. Driveway access design shall ensure compliance with state and county sight distance requirements and safely accommodate truck maneuvers. Driveway access improvements shall not inhibit or diminish the effectiveness of required landscape mitigation. To the maximum extent feasible, the design and scale shall be consistent with the rural character of the area.
- e. Truck deliveries and employee parking shall be accommodated on site.

DevStd-19 New greenhouses, greenhouse related development and packing and shipping facilities contributing peak hour trips to the Santa Monica/Via Real/U.S. 101

northbound interchange and the Linden Avenue/U.S. 101 southbound off-ramp interchange shall pay a pro-rata contribution towards future interchange improvements.

Findings. The Board finds that the intent of Mitigation Measure T-1 to lessen the impacts of traffic associated with new greenhouses, greenhouse related development and packing and shipping facilities is reflected in the previously-cited Development Standard 19, which will be implemented as new packing and shipping facilities, greenhouses and greenhouse related development occurs. The intent of Mitigation Measure T-1 is also reflected in the language of the proposed Memorandum of Agreement between the County and the City of Carpinteria with respect to pro-rata fees towards interchange improvements as well as the identification of appropriate truck routes. The Board finds that the intent of mitigation measure T-1 is also reflected in Coastal Land Use Policy 8-5 (l) which initiates a Regional Transportation Improvement Plan (TIP) to address cumulative traffic impacts in Carpinteria, Summerland, Montecito, and Toro Canyon. The Board also finds that the intent of Mitigation Measures T-2, T-3, T-4, T-5, T-9, and T-10 is reflected in the previously-cited Development Standard 18, which will be implemented as new packing and shipping facilities, greenhouses and greenhouse related development occurs. The Board finds that the intent of Mitigation Measures T-6, T-7 and T-8 are reflected in the Coastal Land Use Policy 8-5(j) and (k).. The Board finds that residual significant impacts are acceptable due to the overriding considerations that support adoption of the Program, discussed in Section VIII.

E. Biological Resources

Impacts. The EIR identifies significant cumulative impacts to biological resources associated with greenhouse development. Cumulative development in the County of Santa Barbara and the Carpinteria Valley is anticipated to increase the inputs of nutrients, pesticides, and other pollutants into the receiving waters, such as the Carpinteria Marsh ecosystem. Cumulative impacts to biological resources are considered significant because, mitigation would not ensure that the cumulative effects on biological habitats from development throughout the Carpinteria Valley would not result in significant water quality related impacts to the Carpinteria Marsh ecosystem.

Mitigation Measures. No mitigation measures are identified in the Biological Resources section of the EIR.

Findings. Mitigation measures are proposed in other sections of the EIR which address impacts to biological resources. These mitigation measures include F&D-3, VIS-2, VIS-4, W-2, and W-4 through W-7. In addition, local Coastal Land Use Plan policies related to the protection of wetland habitats, creeks, riparian habitats, and water quality, including provisions for setbacks, restrictions on discharges of pollutants, and measures to protect wildlife habitat and migration routes are identified in Section 4, Policy Consistency, of the EIR. Other agency regulations (e.g., Army Corps of Engineers, US Fish and Wildlife, and California Department of Fish and Game) would also address impacts to biological resources where such agencies require review of specific development projects that may adversely affect biological resources. The Board finds that

CA Overlay Development Standards 3, 4, 5, 6, 10, 20, 21, 22 and Coastal Land Use Plan Policies 8-5(h) and (i), adopted as part of this Program, address greenhouse and packing and shipping facility related sources contributing to cumulative water quality and biological resource impacts. The Board finds mitigation measures for flooding and drainage and water quality which address biological resources would partially mitigate the above impacts, however cumulative impacts to biological resources remain Class I significant. The Board finds that residual significant impacts are acceptable due to the overriding considerations that support adoption of the Program, as discussed in Section VIII.

VI. FINDINGS THAT CLASS II SIGNIFICANT MITIGABLE IMPACTS ARE MITIGATED TO A LEVEL OF INSIGNIFICANCE

CEQA Guidelines Section 15091(a) requires that, where feasible, all significant adverse impacts be reduced to a level of insignificance. The EIR identifies potentially significant impacts, which are mitigated to a less-than-significant level through incorporation of identified mitigation measures into the Plan, in the areas of: Visual Resources, Water Quality and Groundwater, Flooding and Drainage, Land Use & Agriculture, Air Quality; Noise, and Biological Resources. The “Class II” impacts identified in the EIR are discussed below, along with the appropriate findings as per CEQA Guidelines Section 15091.

A. Visual Resources

Impacts. The EIR identified potentially significant impacts due to the contribution of light and glare from new packing and shipping facilities, greenhouses and greenhouse related development occurs, particularly if the new development is located adjacent to residences or visible from public view corridors (Impact VIS-2).

Mitigation Measures. Some impacts to visual resources can be mitigated through development design and through conditions imposed on new development projects, particularly through the application of Development Standards contained in the CA Overlay. The EIR identified mitigation VIS-2, VIS-4, VIS-8, and VIS-9 which would serve to mitigate Impact VIS-2 and other impacts to visual resources. These measures were incorporated into the Project. The Board finds that additional mitigation has been incorporated into the Project in the following development standards.

DevStd-7 Exterior lighting shall be for specific safety purposes only and shall be hooded/shielded to minimize the spread of light off-site and to minimize impacts to the rural nighttime character.

DevStd-8 To the extent feasible, new greenhouse development and packing and shipping facilities shall be oriented with the roof axis aligned from north to south to reduce glare impacts.

DevStd-16 All new or retrofit greenhouse or plant protection structures shall include a mechanized blackout screen system within growing areas to prevent interior night lighting from being visible outside the structure. If the applicant does not intend to use night lighting, the project description for individual greenhouse projects shall clearly state that night lighting within growing areas shall not occur.

Findings. The Board finds that the intent of Mitigation Measures VIS-2, VIS-4, VIS-8, and VIS-9 to lessen the impacts of light and glare associated with new greenhouse development is reflected in the previously-cited Development Standards, 7, 8, and 16, which will be implemented as new greenhouse and related development occurs. Mitigation VIS-10 (65% maximum lot coverage) has been deleted from the requirements of the CA Overlay District because the Board finds that the aforementioned mitigation measures and development standards as well as the setback requirements in the CA Overlay are sufficient to address potential site specific impacts to visual resources. The Board finds that mitigation measures as incorporated in the development standards, policies and overlay requirements for visual impacts, as described above, would mitigate the above visual resource impacts to levels of insignificance.

B. Water Quality and Groundwater

Impacts. The EIR identified significant, but mitigable impacts due to degradation of surface water quality and groundwater quality from stormwater runoff pollutants, the discharge of irrigation and surface runoff water containing fertilizers and other agricultural chemicals and the construction and reconstruction of greenhouses (Impacts W-1, W-2 and W-3).

Mitigation Measures. Some impacts to water quality and groundwater can be mitigated through development design and through conditions imposed on new development projects, through the application of Development Standards contained in the CA Overlay. The EIR identified mitigation W-1, W-2, W-3, W-4, W-5, W-6, and W-7, which would serve to partially mitigate Impacts W-1, W-2, W-3 and other impacts to water quality and groundwater. These measures were incorporated into the Project. The Board finds that additional mitigation has been incorporated into the Project in the following development standards.

DevStd-3 Where wastewater flows from new greenhouse development and packing and shipping facilities are proposed to be disposed through private septic system, adequate undeveloped area shall be maintained to accommodate the septic system components, including 100% expansion areas, and required setbacks from buildings, property lines, wells, storm water retention facilities, streams, etc. No development shall be placed above the septic system components.

DevStd-4 Compost, fertilizer and pesticides shall be stored in a manner that minimizes generation of leachate. Leachate controls include covering compost piles and

fertilizer storage with a roof and locating storage areas outside of the 100-year flood plain. Uncovered storage areas shall be located at least 250 feet from a waterway (i.e., storm drain, creek, salt marsh or ocean) unless it can be demonstrated that no adverse effect on water quality will result. Should any discharge occur that could impair the water quality of the receiving body, then a discharge permit will be required from the Regional Water Quality Control Board.

DevStd-5 The Carpinteria-Summerland Fire Protection District shall review and approve storage areas for pesticides, herbicides and fertilizers. Storage areas shall be designed with the following mandatory components, and or other requirements deemed necessary by the District:

- a. A low berm shall be designated around the interior floor to prevent migration of materials in the event of a spill. Any spilled material shall be disposed of in accordance with Carpinteria-Summerland Fire Protection District requirements.
- b. The floor shall be a concrete slab.
- c. The berm shall be designed to provide 100% containment of any stored liquids.
- d. In the event that storage, handling or use of hazardous materials within the provisions of AB 2185/2187 occurs on site, the applicant shall implement a Hazardous Materials Business Plan (HMBP).

DevStd-6 High saline brines shall not be discharged to the storm drain or allowed to percolate into the groundwater unless it can be demonstrated that no adverse effect on water quality will result. Waste brine shall be contained and disposed of in accordance with federal, state, county and local regulations and requirements. Should any discharge occur that could impair the water quality of the receiving body, then a discharge permit will be required from the Regional Water Quality Control Board.

DevStd-10 To the maximum extent feasible, vegetative cover shall be provided in areas of non- structural development to encourage storm water infiltration and reduce runoff from hardscaped areas. The use of open field crops should be encouraged to keep non-greenhouse areas in production.

DevStd-20 Applicants shall prepare a Water Quality Management Plan for review and approval by Planning and Development and consultation by Environmental Health and Safety, the Regional Water Quality Control Board and the Carpinteria Valley Water District. The Water Quality Management Plan shall consist of the following components:

- a. A flow diagram of the proposed water system to be used, including average and maximum daily flows.
- b. The mapped location of all existing and proposed surface and sub-surface drainage facilities.
- c. Information on water and nutrient delivery systems.
- d. Pesticide Best Management Practices as defined and required by the County Agricultural Commissioner.

- e. The location and type of treatment and disposal facilities for irrigation, washwater, boiler blowdown, water softener regeneration brines, and retention basins.
- f. Best Management Practices (BMPs), including but not limited to the following:
 - i) Use of water systems that minimize surface water transport (i.e., trickle, drip, mist, hydroponic irrigation systems).
 - ii) Use of water and nutrient recycling technologies.
 - iii) Employment of fertilization methods that maximize the efficiency of nutrient delivery and uptake such as controlled-release fertilizers (CRF) or liquid fertilizer (LF).
 - v) Implementation of Integrated Pest Management techniques.

Should any discharge occur that could impair the water quality of the receiving body, then a discharge permit will be required from the Regional Water Quality Control Board.

DevStd-21 Irrigation Water Detention System: If deemed necessary by Planning and Development, in consultation with the Regional Water Quality Control Board, to further reduce potential water quality impacts, all excess surface irrigation process water shall be collected and routed to a sealed bottom, irrigation water detention basin. The detention basin shall function as a water bank during low rainfall periods (i.e. May to November) for water conservation and reuse. The irrigation water detention basin shall be separate from and not connected to any required flood control retention basin. The irrigation water detention basin shall be designed in accordance with Santa Barbara County Flood Control and Water Conservation District requirements.

DevStd-22 Applicants shall reimburse the Carpinteria Valley Water District (CVWD) for costs related to additional groundwater testing and reporting as deemed necessary by CVWD, pursuant to adopted criteria, to monitor nitrate loading of groundwater caused by applicant's development. Said costs may also include those caused by the installation of monitoring wells deemed necessary by CVWD. All monitoring data and reports prepared by CVWD shall be submitted as public record to the CVWD Board of Directors and the County Planning & Development Department. Nitrate loading found to be in excess of District standards, as a result of the groundwater testing by CVWD, shall cause a subsequent review of the greenhouse facility and operations by CVWD, in consultation with Planning & Development. All subsequent review costs shall be paid for by the applicant

Findings. The Board finds that the intent of Mitigation Measures W-2, W-3, W-6, and W-7 to lessen the impacts to water quality and groundwater associated with new greenhouse development is reflected in the previously-cited Development Standards which will be implemented as new greenhouse and related development occurs. Mitigation W-1 is a P&D standard condition of approval which will be implemented during review and approval of individual greenhouse projects. Mitigation Measures W-4 and W-5 are incorporated in Coastal Land Use Plan Policy 8-5(h) and (i) to address sources contributing to cumulative water quality impacts and to provide for the long-term protection of the ecological functions and values of the Carpinteria Salt Marsh and its coastal stream tributaries. The Board finds that mitigation measures as incorporated in the

development standards, policies and overlay requirements for water quality and groundwater, as described above, would mitigate the above water quality and groundwater impacts to levels of insignificance.

C. Flooding and Drainage

Impacts. The EIR identified significant, but mitigable on- and off-site flooding, drainage and erosion impacts resulting from project buildout (Impact F&D-1 and F&D-2). Construction of greenhouse structures within the 100-year flood plain zone could be susceptible to damage from flooding (Impact F&D-3).

Mitigation Measures. Some impacts to flooding and drainage can be mitigated through development design and through conditions imposed on new development projects, particularly through the application of Development Standards contained in the CA Overlay. The EIR identified mitigation F&D-1, F&D-2, F&D-3, F&D-4, and F&D-5, which would serve to mitigate Impacts F&D-1, F&D-2, F&D-3, and other impacts to flooding and drainage. These measures were incorporated into the Project. The Board finds that additional has been incorporated into the Project in the following development standards.

DevStd-2 Unless otherwise exempted by the Flood Control District, all new greenhouse development and packing and shipping facilities shall be required to mitigate for increased storm water runoff from development of the project site. Post-development runoff shall not exceed 75% of the calculated pre-development runoff. Where required, retention basins and other storm water drainage facilities shall be designed in conformance with the Flood Control District standards.

DevStd-10 To the maximum extent feasible, vegetative cover shall be provided in areas of non- structural development to encourage storm water infiltration and reduce runoff from hardscaped areas. The use of open field crops should be encouraged to keep non-greenhouse areas in production.

Findings. The Board finds that the intent of Mitigation Measures F&D-1 and F&D-3 to lessen the impacts to flooding and drainage associated with new greenhouse development is reflected in the previously-cited Development Standard 2 which will be implemented as new greenhouse and related development occurs. The Board finds that Mitigation Measure F&D-2 is reflected in the CA Overlay Submittal Requirements (Sec.35-102E.6, 1.f). The Board Finds that Mitigation Measures F&D-4 is not relevant and has been deleted from the FEIR. The Franciscan Sedimentation Basin and Craven's Lane Culvert do not and were not intended to have the capacity to accommodate sediment from all future development in that watershed. The Flood Control and Water Conservation District does not provide infrastructure for greenhouse development or any other development as a means to mitigate drainage impacts. Each development project must fully mitigate its own drainage impacts under CEQA and comply with all pertinent Flood Control and Water Conservation District Policies and Design Standards. These projects

are included in the District's Capital Improvement Plan; the sedimentation basin is scheduled to be built during summer 2002 and, to date, the culvert is not scheduled for construction.

The Board finds that the intent of Mitigation Measure F&D-5 is reflected in the CA Overlay Processing requirements (Sec.35-102E.5,1.b). The Board finds that mitigation measures as incorporated in the development standards, policies and overlay requirements for flooding and drainage, as described above, would mitigate the above flooding and drainage impacts to levels of insignificance.

D. Land Use and Agriculture

Impacts. The EIR identifies significant, but mitigable impacts to existing open field agricultural operations resulting from the permanent placement of structures and pavement upon open field prime agricultural soils (Impact LU/AG-2).

Mitigation Measures. Some impacts to land use and agriculture can be mitigated through development design and through conditions imposed on new development projects, particularly through the application of Development Standards contained in the CA Overlay. The EIR identified mitigation LU/AG-1, LU/AG-2, LU/AG-3, and LU/AG-4, which would serve to mitigate Impact LU/AG-2 and other impacts to land use and agriculture. The Board finds that additional mitigation has been incorporated into the Project in the following development standards.

DevStd-1 A landscaping plan shall be required which provides, to the maximum extent feasible, visual screening of all structures and parking areas from all adjacent public roads and view corridors. The landscape plan shall include the following:

- a) The landscaping plan shall consist of plants which will reasonably screen the development within 5 years and which are compatible with the surrounding visual character of the area.
- b) Landscaping within front setbacks shall gradually increase in height away from public roadways. Solid wall fencing shall not be relied upon as a primary means of screening. Solid wall or dark chain-link security fencing shall be screened from public view corridors by dense landscaping and/or covered with attractive climbing vines.
- c) Where structures are proposed in existing orchards or adjacent to wind rows, perimeter trees shall be preserved to the maximum extent feasible in order to provide visual screening along adjacent public roadways. Remnant orchard trees shall be maintained in good condition to ensure that trees do not become hosts for pests or diseases.

Landscaping shall be maintained for the life of the project. The applicant shall post a performance security to ensure that landscaping provides adequate screening within five

(5) years. If landscaping is removed or substantially altered, a revised landscape plan shall be submitted to P&D for substantial conformity review with the original conditions of approval and replacement landscaping shall be installed and maintained.

DevStd-7 Exterior lighting shall be for specific safety purposes only and shall be hooded/shielded to minimize the spread of light off-site and to minimize impacts to the rural nighttime character.

DevStd-8 To the extent feasible, new greenhouse development and packing and shipping facilities shall be oriented with the roof axis aligned from north to south to reduce glare impacts.

DevStd-9 To the maximum extent feasible, hardscaped areas (i.e., parking lots, driveways, loading bays, interior walkways in greenhouses, packing and shipping facilities and accessory building footprints) shall be minimized in order to preserve the maximum amount of agricultural soils. Minimizing the covering of soils shall be accomplished through efficient site and building design and the use of permeable surfaces wherever feasible

DevStd-11 Stationary construction equipment that could generate noise exceeding 65 dB(A) CNEL at property boundaries shall be shielded to County P&D's satisfaction and, where feasible, shall be located a minimum of two hundred (200) feet from sensitive receptors.

DevStd-12 Industrial fans and heaters for all greenhouses, greenhouse related development and packing and shipping facilities shall be designed such that external sound levels do not exceed 65 dB(A) CNEL at the property line. Such equipment shall not be located on greenhouse walls that face adjacent existing residences. To ensure that this maximum sound level is not exceeded, acoustical analyses shall be conducted prior to zoning clearance or at the time of discretionary approval of individual greenhouses, greenhouse related development and packing and shipping facilities, and follow-up noise monitoring shall be conducted at least twice during the first year of greenhouse operation. If noise levels from greenhouse equipment are found to exceed 65 dB(A) CNEL at the property line, adjustments shall be made to ensure compliance with this requirement.

DevStd-13 Noise associated with paging and/or broadcasting of music over speakers within greenhouses, related structures and packing and shipping facilities shall be limited to levels that are not audible at the property line.

DevStd-14 Packing and distribution facilities shall be subject to BAR review. The size, height, design, and appearance shall be compatible with the rural character of the area.

DevStd-15 To the maximum extent feasible, packing and distribution facilities, loading docks, and delivery bays associated with greenhouse development shall be centrally located within individual greenhouse operations. When any packing and

distribution facilities are centrally located, the driveway to reach such a facility shall not be counted toward the CA Overlay development cap. Idling of trucks shall be prohibited between the hours of 9:00 p.m. and 7:00 a.m. A minimum 100-foot setback shall be maintained between loading/unloading areas, driveways and parking areas and adjacent residential properties unless it can be determined that shielding or other measures can provide sufficient attenuation to reduce noise at the property line to less than 65 dB(A) CNEL.

DevStd-16 All new or retrofit greenhouse or plant protection structures shall include a mechanized blackout screen system within growing areas to prevent interior night lighting from being visible outside the structure. If the applicant does not intend to use night lighting, the project description for individual greenhouse projects shall clearly state that night lighting within growing areas shall not occur.

DevStd-18d. Driveway access design shall ensure compliance with state and county sight distance requirements and safely accommodate truck maneuvers. Driveway access improvements shall not inhibit or diminish the effectiveness of required landscape mitigation. To the maximum extent feasible, the design and scale shall be consistent with the rural character of the area.

Findings. The Board finds that the intent of Mitigation Measures LU/AG-2 and LU/AG-4 to lessen the impacts to land use and agriculture associated with new greenhouses, greenhouse related development and packing and shipping facilities is reflected in the previously-cited Development Standards which will be implemented as new greenhouse and related development occurs. Mitigation Measures LUAG-1 and LU/AG-3 are included in the requirements of the CA Overlay and would be applied as greenhouse development occurs. The Board finds that the above sited development standards mitigate land use compatibility impacts to the maximum feasible extent and that mitigation measures as incorporated in the development standards, policies and overlay requirements for land use and agricultural impacts, as described above, would mitigate the above land use and agricultural impacts to levels of insignificance.

E. Air Quality

Impacts. The EIR identifies significant, but mitigable impacts to air quality resulting from greenhouse construction and the temporary emissions of air pollutants, including PM₁₀ (Impact AQ-1).

Mitigation Measures. Some impacts to air quality can be mitigated through development design and through conditions imposed on new development projects, particularly through the application of Development Standards contained in the CA Overlay. The EIR identified mitigation AQ-1 and AQ-2, which would serve to mitigate Impact AQ-1 and other impacts to air quality. The Board finds that additional mitigation has been incorporated into the Project in the following development standards.

DevStd-17 All boilers, steam generators and process heaters proposed at new or expanded greenhouse operations shall utilize low-NOx burners.

Findings. The Board finds that the intent of Mitigation Measure AQ-5 to lessen the impacts to air quality associated with new greenhouse development is reflected in the previously-cited Development Standard which will be implemented as new greenhouse and related development occurs. Mitigation Measures AQ-1 and AQ-2 are P&D standard conditions of approval which will be implemented during review and approval of individual greenhouse projects. AQ-3 and AQ-4 are recommended mitigation measures to further reduce ozone precursor emissions. Applicability and need for these recommended measures will be determined on a case by case basis. The Board finds that mitigation measures as incorporated in the development standards and standard conditions of approval, for air quality, as described above, would mitigate the above air quality impacts to levels of insignificance.

F. Noise

Impacts. The EIR identifies significant, but mitigable temporary, short-term noise impacts at nearby residences resulting from greenhouse, greenhouse related, and packing and shipping facility construction (Impact N-1). Operation of fans and industrial heaters, as well as idling refrigerator trucks, could generate long-term nuisance noise at nearby sensitive receptor locations as well (Impact N-2).

Mitigation Measures. Some impacts to noise can be mitigated through development design and through conditions imposed on new development projects, particularly through the application of Development Standards contained in the CA Overlay. The EIR identified mitigation N-1, N-2, N-3, N-4, and N-5, which would serve to mitigate Impacts N-1, N-2, and other impacts to noise. The Board finds that additional mitigation has been incorporated into the Project in the following development standards.

DevStd-11 Stationary construction equipment that could generate noise exceeding 65 dB(A) CNEL at property boundaries shall be shielded to County P&D's satisfaction and, where feasible, shall be located a minimum of two hundred (200) feet from sensitive receptors

DevStd-12 Industrial fans and heaters for all greenhouses, greenhouse related development and packing and shipping facilities shall be designed such that external sound levels do not exceed 65 dB(A) CNEL at the property line. Such equipment shall not be located on walls that face adjacent existing residences. To ensure that this maximum sound level is not exceeded, acoustical analyses shall be conducted prior to zoning clearance or at the time of discretionary approval of individual greenhouses, greenhouse related development and packing and shipping facilities, and follow-up noise monitoring shall be conducted at least twice during the first year of operation. If noise levels from equipment are found to exceed 65 dB(A) CNEL at the property line, adjustments shall be made to ensure compliance with this requirement

DevStd-13 Noise associated with paging and/or broadcasting of music over speakers within greenhouses, related structures and packing and shipping facilities shall be limited to levels that are not audible at the property line

DevStd-15 To the maximum extent feasible, packing and distribution facilities, loading docks, and delivery bays associated with greenhouse development shall be centrally located within individual greenhouse operations. When any packing and distribution facilities are centrally located, the driveway to reach such a facility shall not be counted toward the CA Overlay development cap. Idling of trucks shall be prohibited between the hours of 9:00 p.m. and 7:00 a.m. A minimum 100-foot setback shall be maintained between loading/unloading areas, driveways and parking areas and adjacent residential properties unless it can be determined that shielding or other measures can provide sufficient attenuation to reduce noise at the property line to less than 65 dB(A) CNEL.

Findings. The Board finds that the intent of Mitigation Measure N-1, N-3, N-4, and N-5 to lessen the noise impacts associated with new greenhouses, greenhouse related development and packing and shipping facilities is reflected in the previously-cited Development Standards which will be implemented as new greenhouse and related development occurs. Mitigation Measure N-2 is a P&D standard condition of approval. The CA Overlay could allow a slight increase in the concentration of greenhouse development adjacent to residential development located in the northwest part of the City of Carpinteria. The CA Overlay proposes that the setback from adjacent residential development be 100 ft. In addition, mitigation measures in the Proposed Final EIR that address noise impacts have been incorporated as development standards in the Overlay. The setback requirement is not considered new mitigation because no change in the impact significance conclusions results.

The Board finds that mitigation measures as incorporated in the development standards and standard conditions of approval, for noise, as described above, would mitigate the above noise impacts to levels of insignificance.

G. Biological Resources

Impacts. The EIR identifies significant, but mitigable impacts to biological resources resulting from greenhouse development, greenhouse related development and packing and shipping facilities. Such development may cause potentially significant impacts to aquatic biological resources from increased inputs of silt, sediment, nutrients, pesticides, and/or pollutants carried in stormwater runoff (Impact B-1, B-2, B-3). The change in water runoff patterns due to development of greenhouses, greenhouse related development and packing and shipping facilities may also impact aquatic biological resources by altering the seasonal flow pattern of the creek (Impact B-4). Development of greenhouses, greenhouse related development and packing and shipping facilities has the potential to reduce available habitat for foraging and residence through conversion of open field areas and may cause an indirect and cumulative impact to regional fish and

wildlife resources because of the interruption of wildlife corridors or habitat linkages (Impact B-5, B-6).

Mitigation Measures. No mitigation measures are identified in the Biological Resources section of the EIR.

Findings. Mitigation measures are proposed in other sections of the EIR which address impacts to biological resources. These mitigation measures include F&D-3, VIS-2, VIS-4, W-2, and W-4 through W-7. In addition, Coastal Land Use Plan policies related to the protection of wetland habitats, creeks, riparian habitats, and water quality, including provisions for setbacks, restrictions on discharges of pollutants, and measures to protect wildlife habitat and migration routes are identified in Section 4, Policy Consistency, of the EIR. Other agency regulations (e.g., Army Corps of Engineers, US Fish and Wildlife, and California Department of Fish and Game) would also address impacts to biological resources where such agencies require review of specific development projects that may adversely affect biological resources. The Board finds that CA Overlay Development Standards 3, 4, 5, 6, 10, 20, 21, 22 and Coastal Land Use Plan Policies 8-5(h) and (i), adopted as part of this Program, address greenhouse and packing and shipping facility related sources contributing to cumulative water quality and biological resource impacts. The Board finds mitigation measures for flooding and drainage and water quality which address biological resources would mitigate the above impacts to levels of insignificance. Cumulative impacts to biological resources remain Class I significant, however the Board finds that residual significant impacts are acceptable due to the overriding considerations that support adoption of the Program, as discussed in Section VIII.

VII. FINDINGS REGARDING PROGRAM ALTERNATIVES

The EIR evaluated the effects of three alternatives to the originally proposed project, including the “no project” alternative required by CEQA. The alternatives were developed and selected using the same general criteria as for the originally proposed project, including factors such 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 Planning Commission and Board of Supervisors generally examined issues and impacts related to coastal resources, land use compatibility and other planning concerns as they applied to each alternative. The Commission and Board also heard extensive public input from greenhouse operators, open field agriculturists, and other interested citizens. The Board’s final decision considered all pertinent factors, and in many cases the Board needed to reconcile the concerns of greenhouse operators, open field agriculturists, residential neighbors and the City of Carpinteria. The Board’s selection of the CA Overlay reflects the importance of protecting coastal resources and open field agriculture by limiting future greenhouse development, greenhouse related development, and packing and shipping facilities to specific parcels, which are primarily located within or adjacent to historic greenhouse clusters. In addition, selection of the CA Overlay simultaneously

recognizes and supports the significant contribution of greenhouses to the local and County-wide agricultural economy.

The EIR identifies and analyzes a range of reasonable alternatives, however sites outside of the Carpinteria Valley are not evaluated for potential future greenhouse expansion. The range of alternatives addressed in the proposed FEIR focus upon agriculturally designated lands within the Carpinteria Valley. The Project objectives and range of EIR 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 suitable on agricultural lands, if appropriately sited.

The following discussion includes the reasoning behind the Board's rejection of each of the alternatives and the originally proposed project in favor of the CA Overlay.

A. No Project Alternative: 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. Greenhouses and packing and shipping facilities less than 20,000 square feet would be processed with a Coastal Development Permit.

The No Project Alternative assumes a net increase of 4.5 million square feet of new greenhouse and packing and shipping facility development, exceeding 20,000 square feet over the next 15 years. However, no development "cap" on the total amount of greenhouse and packing and shipping facility development would be imposed under the No Project Alternative. Development could be scattered throughout the study area, within visually prominent open space corridors, resulting in open space conversion, visual impacts and a change in the rural character of the area. Although the classification of significant impacts would be the same as the proposed project, the impacts would be more severe and there would be less incentive for infill development and retrofitting of existing aging greenhouses under the No Project Alternative as compared to the proposed project. New greenhouse clusters could therefore emerge throughout the Valley resulting in further fragmentation of open field agricultural lands and more greenhouse development adjacent to residential uses, both of which would contribute to land use conflicts relating to aesthetics, noise, traffic, and cumulative change in community character. Fragmentation of highly productive blocks of open field agricultural land and impacts related to the loss of agricultural soils due to accessory structures would be greater than under the proposed project. The No Project Alternative would generate 1,215

Average Daily Trips (ADT), 135 A.M. Peak Hour Trips (PHT) and 270 P.M. PHT. This is 473 ADT, 52 A.M. PHT and 105 P.M. PHT more than the proposed project, or an approximately 61%% increase in traffic as compared to proposed project buildout.

With an additional 1.85 million square feet, development of greenhouses and packing and shipping facilities under this scenario could also occur within existing flood areas, which may result in slightly greater increase in peak flood flows and generally greater flooding impacts than that associated with the proposed project. Without restrictions on the location of development there is a greater likelihood that development could occur near Arroyo Paredon and Carpinteria Creek under the No Project Alternative. This could result in the loss of native habitat along these creeks and an increase in the pollutant load currently experienced which could degrade water quality.

The community benefits (new development standards to appropriately sight greenhouse development and minimize land use and resource impacts) associated with the proposed project would not be realized under the No Project Alternative. This alternative would not meet the primary project objectives to: assess the cumulative affects of greenhouse development upon coastal resources; designate appropriate lands in the Carpinteria Valley for future greenhouse development; and to provide well-crafted development standards which ensure potential land use and environmental impacts are minimized. Therefore, the Board of Supervisors finds that the project as adopted is preferable to the “No Project” alternative.

B. Low Buildout (Environmentally Preferable Alternative): Buildout of this alternative would be similar to the CA Overlay project description; however, potential expansion of underdeveloped parcels and/or redevelopment of older greenhouses is encouraged as the primary means of accommodating new development. This alternative scenario would result in the construction of approximately 2.2 million square feet of greenhouses, related structures, and packing and shipping facilities (not including retrofitting and reconstruction of aging greenhouse structures). This represents a reduction in new greenhouse, related structures, and packing and shipping facility development buildout potential by 20% as compared to the proposed project. Development less than 20,000 square feet would occur as under the No Project Alternative. Visual impacts relating to open space conversion and impacts to public viewsheds would coincidentally be reduced under this alternative. Primary land use impacts would be similar to those of the proposed project, however this alternative is considered superior to the proposed project with respect to agricultural impacts. The Low Buildout alternative would reduce the potential for flooding impacts and the potential for flood damage to greenhouse structures and packing and shipping facilities as compared to the proposed project. A 28% reduction in overall traffic generated in the study area would result from this alternative as compared to the proposed project, however, significant impacts could occur at the Santa Monica/Via Real/U.S. 101 NB ramps and Linden/U.S. 101 SB off-ramp intersections.

While most adverse impacts would be quantitatively and qualitatively less severe, no impacts would be reduced to a level of insignificance when compared to the proposed project. Greenhouse production is a vital component of the County's agricultural base and an important local economic contributor. The Low Buildout Alternative would provide for less of the economic growth and development that is an important benefit to the community. Therefore, the Board of Supervisors finds that the Low Buildout Alternative is less socially and economically feasible and the project as adopted is preferable to the Low Buildout Alternative.

C. High Buildout Alternative: Buildout of this alternative would result in approximately 4.3 million square feet of new greenhouse development. Impacts to loss of open space, and visual impacts along public view corridors would be greater for this alternative than the proposed project. The High Buildout Alternative would permit approximately 1.3 million square feet of new greenhouse development north of Highway 192, between Carpinteria High School and Carpinteria Creek, which historically has been open field agriculture. This area is highly visible from public viewing locations and is a gateway to the rural agricultural lands that encompass the eastern Carpinteria Valley.

Expanding new greenhouse development north of Highway 192 could result in further fragmentation of open field agricultural lands and contribute to land use conflicts relating to aesthetics, noise, traffic, and cumulative change in community character. 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. Fragmentation of highly productive blocks of open field agricultural land and impacts related to the loss of agricultural soils due to accessory structures would be greater than under the proposed project. A 64% increase in daily traffic would result from the High Buildout Alternative, thereby increasing overall traffic levels throughout the study area, including 75 more light to medium truck trip-ends and 21 more large truck trip-ends per average weekday than the proposed project.

The High Buildout alternative would also increase the potential for flooding impacts resulting from the potential 37% increase in impermeable surfaces associated with greenhouse development, which may result in slightly greater increase in peak flood flows and generally greater flooding impacts than that associated with the proposed project. Greenhouse development under this alternative could cause a similar increase in the discharge of nutrient-rich surface waters (pollutant load) into the local creek system and to the Carpinteria Salt Marsh. This could result in the loss of native habitat along these creeks and an increase in the pollutant load currently experienced.

The community benefits (new development standards to appropriately sight greenhouse development and minimize land use and resource impacts) associated with the proposed project would not be realized under the High Buildout Alternative. Therefore, the Board of Supervisors finds that the project as adopted is preferable to the High Buildout Alternative.

VIII. STATEMENT OF OVERRIDING CONSIDERATIONS

The Final EIR (99-EIR-02 and Revision Document [February 19, 2002]) for the Carpinteria Valley Greenhouse Program identifies project impacts to visual resources, water quality and groundwater, land use and agriculture, traffic, and biological resources as unavoidable. The Board of Supervisors has determined that with implementation of the identified mitigation measures, the project is consistent with all policies of the Comprehensive Plan and Zoning Ordinance. Having balanced the benefits of the project against its significant and unavoidable effects, the Board of Supervisors hereby determines that the project's unavoidable impacts are acceptable in light of the project's benefits. The Board of Supervisors therefore adopts the following statement of Overriding Considerations, which warrant adoption of the program notwithstanding that all identified impacts are not fully mitigated. Pursuant to CEQA Sections 15043, 15092, 15093, any remaining significant effects on the environment are acceptable due to these overriding considerations:

- A. The Carpinteria Valley Greenhouse Program, including Article II amendments to adopt the CA Overlay District and LCP Policies amendments further implements Coastal Land Use Plan Policy 8-5 to assess the cumulative impacts of greenhouse development upon coastal resources.
- B. 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 visual and natural resource protection, service and infrastructure capacities, protection of the rural character of the Carpinteria Valley and the need to preserve and enhance agriculture as a major viable production industry in Santa Barbara County.
- C. The Program balances resource protection issues by limiting future greenhouse development primarily to CA Overlay District "Area A" within and adjacent to existing historic greenhouse clusters south of Highway 192 between Nidever Road and Linden Avenue. Area A provides a logical greenhouse expansion boundary for the continuation of highly productive coastal agriculture opportunities, while preserving the scenic values and rural character of the Carpinteria Valley. CA Overlay District "Area B" provides standards which support open field agriculture as a viable, long-term agricultural use by limiting greenhouse development and intensive infrastructure improvements.
- D. The CA Overlay District recognizes the economic importance of greenhouse agriculture by allowing limited greenhouse development to occur on designated view corridor parcels in "Area A". Maximum lot coverage, height limit, and setback restrictions in these areas are designed to minimize fragmentation of large blocks of contiguous open field agriculture and preserve to the greatest extent feasible, important public view corridors.

- E. In balancing the needs of the community, the Program provides a new greenhouse development cap of 2.75 million square feet within CA Overlay District Area A which accommodates and promotes continued greenhouse expansion within available resources, protects natural resources, preserves the rural character of the Carpinteria Valley and balances the needs of future residents of the community with the needs of the existing community.
- F. The CA Overlay recognizes the importance of greenhouse agriculture to the local, County, and statewide economy by including provisions that recognize legally permitted greenhouse development as conforming uses within the overlay district. The CA Overlay also includes an amnesty program allowing existing unpermitted greenhouse development to be legalized through application for a development permit if such structures conform to the provisions of the overlay district.
- G. The Program promotes orderly development while protecting natural resources to the maximum extent feasible. The CA Overlay includes numerous development standards and zoning requirements to ensure that on and off-site impacts to visual resources, water quality, traffic and biological and agricultural resources are avoided or minimized and to ensure that other resource and land use compatibility impacts are minimized.
- H. The overlay is in accordance with the Board's original direction to limit any land use or zoning changes that may result from this program to the Carpinteria Valley.
- I. Greenhouse and related operations are expected to increase the economic activity in Santa Barbara County and the City of Carpinteria and neighboring communities through the generation of sales tax revenues associated with off-site purchases and the construction and maintenance of greenhouse structures which would create additional purchases of material and labor in the area. This increase in economic activity can both support existing services and stimulate growth in other economic sectors.
- J. The Program incorporates the proposals of the environmentally superior alternative analyzed in the EIR to the extent feasible. The other alternatives analyzed in the EIR including the "No Project" alternative, would either result in environmental impacts of greater severity than those of the Program or have been found infeasible and incapable of meeting the beneficial objectives of the Program.
- K. The Program provides clarity for future packing greenhouse, greenhouse related development and packing and shipping facility applicants and land use regulators. The clearly defined standards and requirements of the Program will minimize the future environmental review, time, and cost in the permit process. This benefit is not present in the existing setting.

IX. MITIGATION MONITORING AND REPORTING PROGRAM

A Mitigation Monitoring and Reporting Program for the Carpinteria Valley Greenhouse Program FEIR is included as an attachment to the EIR Revision Document (99-EIR-02 RV1) (dated February 19, 2002) and has been adopted pursuant to the requirements of Public Resources Code § 21081.6.