

ATTACHMENT 8 EIR ADDENDUM

TO: Board of Supervisors

FROM: Anne Almy, Supervising Planner
Development Review South Division, Planning and Development
Staff Contact: Julie Harris

DATE: December 4, 2013

RE: CEQA Determination: Finding that CEQA Guidelines Section 15164 (Addendum) applies to the Van Wingerden Greenhouses, Case Numbers 11RZN-00000-00001, 10DVP-00000-00010 and 11CDP-00000-00009. CEQA Guidelines Section 15164 allows an addendum to be prepared when only minor technical changes or changes which do not create new significant impacts would result. The Environmental Impact Report (99-EIR-02 RV 1), prepared for the Carpinteria Valley Greenhouse Program, Case Numbers 99-GP-007, 99-OA-005 and 99-RZ-009, is hereby amended by this 15164 letter for Case Numbers 11RZN-00000-00001, 10DVP-00000-00010 and 11CDP-00000-00009.

1.0 INTRODUCTION AND BACKGROUND

The California Environmental Quality Act (CEQA) requires analysis of environmental impacts that could occur as a result of project development. State CEQA Guidelines Section 15164 provides for the preparation of an addendum to a previously certified Environmental Impact Report (EIR) when only minor technical changes or additions are necessary to make the EIR under consideration adequate under CEQA for the current project, and the changes to the EIR made by the addendum do not raise important new issues about the significant effects of the project on the environment and none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR have occurred..

The Carpinteria Valley Greenhouse Program Revised Final EIR (99-EIR-02 RV 1) analyzed impacts associated with the creation and implementation of the Carpinteria Agricultural Overlay District (CA Overlay). The CA Overlay created two zoning overlay areas within the agricultural lands of the Carpinteria Valley: Area A allows greenhouse development and expansion with approval of a Development Plan, subject to specific development standards. Area B limits new greenhouse development to no more than 20,000 sq. ft. of cumulative greenhouse development per legal lot, while greenhouses legally-permitted as of the effective date of the ordinance¹ would be allowed to continue as conforming structures. Within Area A, the CA Overlay includes a development cap of 2.75 million sq. ft. of new greenhouse development beginning with the effective date of the ordinance. In addition, 11 parcels within Area A were given a view corridor designation that includes additional development standards, the most relevant of which are a 25% lot coverage limit instead of no limit, and a 25 ft. maximum height instead of a 30 ft. maximum height.

¹ The effective date of the ordinance was April 20, 2004, when the Board of Supervisors accepted the Coastal Commission's approval with modifications.

The EIR identified unavoidable significant impacts (Class I) with full buildout under the CA Overlay in the areas of Visual Resources, Land Use and Agriculture, and Traffic. The EIR also identified significant environmental impacts that can be feasibly mitigated or avoided (Class II) in the areas of Visual Resources, Water Quality and Groundwater, Flooding and Drainage, Land Use and Agriculture, Air Quality, Noise, and Biological Resources. The EIR included mitigation measures to address these impacts. These measures were incorporated as ordinance requirements and development standards of the CA Overlay.

The Board of Supervisors found that adverse impacts identified in the Carpinteria Valley Greenhouse Program EIR have been mitigated to the maximum extent feasible, and to the extent these impacts remain significant and unavoidable after implementation of mitigation measures, such impacts are acceptable when weighed against the overriding social, economic, and other considerations set forth in a Statement of Overriding Considerations adopted by the Board of Supervisors for the Carpinteria Valley Greenhouse Program (dated February 19, 2002).

The proposed project consists of two separate but related activities. The first is a Zoning Map Amendment (Case No. 11RZN-00000-00001) that would revise the CA Overlay map to remove the view corridor designation from the subject parcel, which is located in Area A. This is the only proposed change to the Carpinteria Valley Greenhouse Program. The second part of the project is a Development Plan (Case Nos. 10DVP-00000-00010 and 11CDP-00000-00009) to allow the construction of approximately 264,500 sq. ft. of greenhouse development on the subject lot, which would be consistent with the requirements of the CA Overlay and the CA Overlay map (if amended by 11RZN-00000-00001).

This Addendum to the Carpinteria Valley Greenhouse Program Revised Final EIR includes two parts. The first addresses the potential impacts of the specific change associated with the proposed Zoning Map Amendment. The second analyzes the potential impacts associated with the proposed Development Plan. This Addendum has been prepared pursuant to CEQA Guidelines §15164. CEQA Guidelines §15164 does not require circulation of addenda. This Addendum, together with 99-EIR-02 RV 1, will be utilized by County decision-makers during consideration of the proposed project.

The Carpinteria Valley Greenhouse Program Revised Final EIR (99-EIR-02 RV 1) is available for review at Santa Barbara County Planning and Development, 123 E. Anapamu Street, Santa Barbara, California and on the Planning and Development website at <http://www.sbcountyplanning.org/projects/11RZN-00001Greenhouses/index.cfm>. The State Clearinghouse identification number for 99-EIR-02 RV 1 is 99-041114.

2.0 LOCATION

The project site is a 13.655-acre parcel located south of Foothill Road (State Route 192) between Nidever Road to the west and Cravens Lane to the east, located south of Foothill Road in the Carpinteria area, First Supervisorial District, Assessor's Parcel Number (APN) 005-310-024. The site does not have an assigned address number.

3.0 CHANGES TO THE PROJECT (PROJECT DESCRIPTION)

The project includes two applications to validate the unpermitted construction of a greenhouse in the AG-I-10 zone, thereby abating a zoning violation (10ZEV-00000-00002). The project is composed of the following elements: a Zoning Map Amendment (Rezone); and a Development Plan and Coastal Development Permit.

Zoning Map Amendment

A Zoning Map Amendment (11RZN-00000-00001) is proposed to amend the CA Overlay map to remove the view corridor designation from a 13.655-acre parcel, APN 005-310-024. Removal of the view corridor designation from this parcel would allow greenhouse development to exceed 25% coverage of the lot and would allow greenhouses to be constructed up to a maximum of 30 ft. in height instead of 25 ft. in height. There are no changes proposed to the text of the Coastal Land Use Plan or the Coastal Zoning Ordinance.

Development Plan and Coastal Development Permit

A Development Plan (Case No. 10DVP-00000-00010) and Coastal Development Permit (11CDP-00000-00009) are proposed to validate the unpermitted construction of a 264,500 sq. ft. greenhouse (9.6% of the CA Overlay development cap); three existing permitted greenhouses on the site would be incorporated into the Development Plan. The three existing permitted greenhouses total approximately 122,100 sq. ft. and were permitted between 1968 and 1971.² At project completion, total greenhouse development on the lot would be approximately 386,600 sq. ft. for total lot coverage of 65.0%. The currently unpermitted greenhouse is 17 feet 7 inches in height. The previously permitted greenhouses are 15 feet high. There would be no change to the height of any greenhouse structure.

All cultivation would be in the ground using the native soil. Three parallel concrete-paved areas, 17 feet by 393 feet each, would provide access for small farm vehicles within the new 264,500 sq. ft. greenhouse (located along the north and south ends of the greenhouse and one through the center). No other paving is proposed. A drip irrigation system would be employed. No heaters or boilers would be used or proposed. The new greenhouse would include interior “grow” lights, and black shade cloth would be installed to block light escape at night when the grow lights are employed. No exterior night-lighting is proposed. Fans would be employed inside the greenhouses to provide air circulation.

The greenhouses are operated by Ocean Breeze Nursery, a company owned by the property owners and applicants Rene and June Van Wingerden. Ocean Breeze Nursery is a flower-growing operation located on this and several adjacent and nearby parcels (APNs 005-310-026, 005-430-042 and 005-430-043). The greenhouses on the site employ 11 people who also work at the adjacent Ocean Breeze Nursery properties.

² Three greenhouses were originally permitted by permit numbers 43977, 45586 and 49802 for a total of 123,456 sq. ft.

Access and Parking

Direct access to the site is provided by a private driveway from Foothill Road. The applicant requests a Development Plan modification pursuant to Article II Section 35-174.8.1, to modify the parking requirements for the greenhouses; specifically, to reduce the zoning ordinance requirement of 18 parking spaces to 11 spaces, to allow the uncovered parking to be unpaved, and to waive certain design specifications for marking and striping. The parking would be located no closer than 100 feet from the top-of-bank of Arroyo Paredon. The reason for the modification request is based on the operational/employee needs for the existing greenhouse development: current employee and visitor parking is accommodated on the nearby Ocean Breeze Nursery properties (APNs 005-430-042 and 005-430-043); access to the project site by employees is via internal circulation on foot or by electric cart from the adjacent Ocean Breeze properties; and all products grown on the subject lot are moved by internal circulation to the adjacent property for packing and shipping. The provision of 11 parking spaces instead of 18 is based on the actual labor and number of employees needed to staff the nursery operation in the greenhouses on the subject property, as described by the applicant and agent.

Grading and Drainage

No grading is proposed. The project includes a series of four retention basins to slow the rate of storm water runoff leaving the site.

Landscaping/Screening

A band of avocado trees approximately 70-120 feet wide (part of the pre-existing avocado orchard on the property) would remain in place along the northern extent of the property between the development and Arroyo Paredon. Existing bamboo lines the west property line and existing cypress trees are located along the south property line. These plant materials would remain in place to provide screening of the greenhouses.

Public Services

Irrigation water is supplied by the Carpinteria Valley Water District and an agricultural well located on the adjacent lot to the east (APN 005-310-026), which is under the same ownership.³ The property would continue to be served by the Carpinteria Valley Water District, the agricultural well, and the Carpinteria-Summerland Fire Protection District. Sewage disposal is not proposed; employees use restroom facilities located on the adjacent Ocean Breeze Nursery properties (APNs 005-310-026, 005-430-042 and 005-430-043).

4.0 ENVIRONMENTAL SETTING

Slope/Topography – The site is relatively level, gently sloping to the south (less than 1% slope). Drainage from the site flows to the south-southwest.

³ The agricultural well was permitted in 1991 to provide supplemental agricultural water only. A subsequent lot split, which created the subject lot and the parcel to the east, noted in the project description that the well would continue to provide water to both parcels.

Surface Water Bodies – Arroyo Paredon Creek comprises most of the northern property line. Arroyo Paredon is identified and mapped as riparian Environmentally Sensitive Habitat (ESH) in the Coastal Land Use Plan and on the Article II zoning overlay map. A private driveway and a remnant avocado orchard are located in an approximately 70-120 foot wide swath across the north end of the subject lot between the top-of-bank and riparian vegetation associated with the ESH and the existing permitted and unpermitted greenhouse development.

Fauna – No sensitive animals are known to occur on the site; however, along with other South Coast creeks, Arroyo Paredon has been identified as sensitive habitat for the endangered Steelhead Trout.

Flora – Riparian vegetation, including native sycamore trees and willows line the banks of Arroyo Paredon. A remnant avocado orchard is located in an approximately 70-120 foot wide swath across the north end of the subject lot between the riparian vegetation and the existing greenhouse development, while bamboo lines the west property line and cypress trees are located along the south property line. The remainder of the property undergoes agricultural cultivation.

Archaeological Sites – No archaeological or historic resources are known to be located on the project site.

Soils – Soils on the site are almost entirely Elder Sandy Loam, a Class II prime soil. The site is mapped on the California State Important Farmlands Map as prime agricultural land.

Surrounding Land Uses – Surrounding land uses include active agriculture (zoned AG-I-10 and AG-I-20) including a mix of orchards, open field agriculture and greenhouse development, along with scattered residences on these agricultural lands.

Existing Structures – Approximately 386,600 sq. ft. of greenhouses, of which 122,100 sq. ft. were permitted and constructed between 1968 and 1971. The 264,500 sq. ft. greenhouse has not been permitted. The site includes four unpermitted retention basins.

Access – Primary access to the site is from Foothill Road via a private driveway across the adjacent lot to the east. The private driveway traverses the north end of the subject lot between the top-of-bank and riparian vegetation to serve the adjacent property to the west.

5.0 CHANGES IN ENVIRONMENTAL EFFECTS – ZONING MAP AMENDMENT (11RZN-00000-00001)

Regulatory Setting: The subject property is located in Area A of the CA Overlay and is designated as a view corridor parcel. Within Area A, greenhouse development is allowed subject to the requirements and development standards of the CA Overlay. Within Area A, there are three ordinance requirements particularly relevant to the proposed Zoning Map Amendment.

1. There is a development cap on new greenhouse development; no more than 2.75 million square feet may occur after adoption of the overlay district (Article II Sec. 35-102F.4).

2. There is no lot coverage restriction (Article II Sec. 35-104F.8.1).
3. There is a maximum height limit of 30 feet above finished grade (Article II Sec. 35-104F.8.2.a).

Additional requirements apply to those parcels with a view corridor designation. Within the view corridor designation, greenhouse development is limited to a maximum lot coverage of 25% (Article II Sec. 35-104F.8.1.a) and a maximum height limit of 25 feet (Article II Sec. 35-104F.8.2.b).

Impact Discussion: The Greenhouse Program EIR (99-EIR-02 RV 1) analyzed the impacts of full buildout under the program in the following eight issue areas:

- Visual Resources
- Water Quality and Groundwater
- Flooding and Drainage
- Land Use and Agriculture
- Traffic
- Air Quality
- Noise
- Biological Resources

The Zoning Map Amendment would remove the view corridor designation from this one parcel. As a result, the parcel could be developed with a greater square footage of greenhouse development⁴ than allowed by the maximum 25% lot coverage under the view corridor designation. The project would not increase the overall amount of greenhouse development that could occur within Area A of the CA Overlay because the development cap would not be revised. Greenhouse development within Area A may occur on any parcel zoned for agriculture, including parcels with the view corridor designation, until such time as the 2.75 million sq. ft. development cap is reached. Thus, the Zoning Map Amendment would not increase the total amount of greenhouse development that could occur under the Greenhouse Program. The Amendment would not revise the boundaries of Area A.

With respect to Visual Resources, the proposed Zoning Map Amendment would remove a view corridor designation from one parcel within a view corridor that was identified during development and review of the Greenhouse Program. Of the 11 parcels that were given the view corridor designation, the subject parcel is unique. It is the least visible from public viewing areas. Of the view corridor parcels between Nidever Road and Cravens Lane, it is the furthest away from Highway 101 and Via Real. It is only briefly, partially visible in the distant background from the Highway 101/Santa Claus Lane overpass due to existing development in between, and only if the public is specifically looking for it. Unlike the view corridor parcels between Craven Lane and Santa Monica Road, the lot does not abut Foothill Road and public views from Foothill Road are

⁴ For the purposes of this discussion, “greenhouse development” refers to all greenhouses, packing and shipping facilities, shade and hoop structures and other related development (including paved areas and accessory structures), unless expressly stated otherwise.

screened by the existing riparian vegetation of Arroyo Paredon. This riparian vegetation is protected by its designation as Environmentally Sensitive Habitat. As such, the lot is not highly visible as seen from these public viewing places.

With removal of the view corridor designation and the 25% lot coverage limit, greenhouse development of up to 30 feet in height (instead of 25 feet) could occur over most of the parcel after setbacks and access are taken into consideration. The development cap would not be revised. While more development could occur on the subject parcel, a corresponding and equal square footage of greenhouse development would not occur on other parcels within Area A due to the cap. In addition, any development on the parcel would still be required to meet all of the mitigation measures identified in the Greenhouse Program EIR and CA Overlay development standards, including requirements for design review and landscape screening, among others. Given these requirements, the location of the parcel at the east edge of the larger view corridor (i.e., adjacent to existing greenhouses and parcels unlimited by the view corridor ordinance requirements) and existing limited views of the site, removal of the view corridor designation from this particular parcel would not create a new impact to Visual Resources nor would it increase the severity of impacts identified in 99-EIR-02 RV 1.

With respect to the other impacts addressed in the Greenhouse Program EIR, any new greenhouse development on the subject parcel, regardless of the quantity of development, must comply with the EIR mitigation measures and development standards adopted into the CA Overlay. The only change as a result of the proposed Zoning Map Amendment would be an increase in the allowable maximum amount of greenhouse development that could occur on this one parcel within Area A. Therefore, no new impacts would be created and no significant increase in the severity of previously identified impacts would occur with removal of the view corridor designation from this one parcel.

Therefore, the proposed Zoning Map Amendment would not create a new significant impact, nor would it increase the severity of any previously identified impact. Impacts of the Zoning Map Amendment would be less than significant.

Mitigation Measures and Residual Impacts: No additional mitigation is required. Residual impacts resulting from buildout under the provisions of the CA Overlay would remain the same as identified in 99-EIR-02 RV 1. The Board of Supervisors adopted a Statement of Overriding Considerations for those significant impacts to Visual Resources that could not be fully mitigated.

6.0 ENVIRONMENTAL EFFECTS SPECIFIC TO THE PROPOSED DEVELOPMENT PLAN (10DVP-00000-00010 AND 11CDP-00000-00009)

This section analyzes the potential impacts of the proposed Development Plan and Coastal Development Permit (i.e., the permitting of the existing 264,500 sq. ft. unpermitted greenhouse and the potential effects of its construction and use on the environment). The three permitted greenhouses, constructed 40+ years ago, were part of the baseline of the environmental analysis for the Greenhouse Program EIR and remain part of the baseline for this Development Plan/Coastal

Development Permit. Therefore, the analysis herein focuses on the potential environmental impacts of the unpermitted greenhouse.

The majority of the impacts identified in the Greenhouse Program EIR would occur within Area A because most future greenhouse development would occur within this area (up to the 2.75 million sq. ft. allowed under the development cap). For each issue area below, applicable mitigation measures from the EIR are stated and discussed. Although already constructed and in use, the unpermitted greenhouse must comply with the applicable mitigation measures and the development standards adopted into the CA Overlay, including those that would reduce potential impacts. Either the project, as built, already complies with the identified mitigation (e.g., Visual Resources, Land Use and Agriculture) or conditions of approval would be applied to the Development Plan to ensure compliance with applicable EIR mitigation measures and the requirements of the CA Overlay.

6.1 Visual Resources

Impact Discussion: Views of the project site are minimal from the north due to the existing riparian vegetation of Arroyo Paredon between the site and Foothill Road and from the south due to the distance between the site and the public views available to travelers on Highway 101 and Via Real to the south. The Greenhouse Program EIR (99-EIR-02 RV 1) identified two potentially significant and unavoidable aesthetic impacts as a result of buildout under the CA Overlay. The following mitigation measures identified in the EIR, relevant to the proposed project, were incorporated into the final CA Overlay as ordinance requirements and development standards:

- **VIS-2** requires all new or retrofit greenhouses to install mechanized blackout screens to screen interior night lighting or state that night lighting will not be used.
- **VIS-4** limits exterior lighting to the minimal necessary for safety purposes and requires any lighting to be hooded or shielded to minimize offsite impacts to the rural nighttime character.
- **VIS-5** requires landscaping within front setbacks to gradually increase in height away from public roadways.
- **VIS-6** requires submittal of a landscape plan.
- **VIS-7** requires landscape screening be maintained for the life of the project.
- **VIS-8** requires a north-south orientation of greenhouse roof axes.
- **VIS-9** requires the preservation of perimeter trees when greenhouses are proposed on lots with existing orchards or windrows.

The Development Plan would permit an existing unpermitted 264,500 sq. ft. greenhouse and incorporate the three existing permitted greenhouses (approximately 122,100 sq. ft.) on the lot into the Development Plan. At project completion, total greenhouse development would be approximately 386,600 sq. ft. for a total lot coverage of 65%. Although the unpermitted greenhouse is already constructed and in use, it was built in compliance with the visual resources mitigation measures listed above and discussed in detail below.

The unpermitted greenhouse is 17 feet 7 inches in height, 12 feet below the maximum allowed height of 30 feet. The previously permitted greenhouses are 15 feet in height. There would be no change in height with the proposed project. The greenhouses are not visible from public viewing areas because the development is screened by existing vegetation following the standards of the CA Overlay. The unpermitted greenhouse was built on a site that was previously a cultivated orchard. A band of avocado trees 70-120 ft. wide was left in place across the northern end of the lot, which, combined with the riparian vegetation of Arroyo Paredon, screens the development from Foothill Road. In addition, bamboo along the western parcel boundary and cypress along the southern boundary screen the newer greenhouse from the more distant and limited public views from Via Real and Highway 101. The applicant included these elements as part of the proposed landscape plan, which has received conceptual review by the South Board of Architectural Review. Thus, the project has been designed and constructed consistent with measures VIS-5, VIS-6, and VIS-9.

As a result, the project would not obstruct any scenic view open to the public, would not create an aesthetically offensive site open to public view, would not change the visual character of an area, and would not result in visually incompatible structures. Project specific impacts would be less than significant.

Consistent with VIS-8, the roof axes are oriented in a north-south direction, which was determined in the Greenhouse Program EIR to reduce daytime glare. At times, night lighting is used in the interior to assist plant growth. Consistent with VIS-2, the unpermitted greenhouse is equipped with interior blackout screens, which would be employed to prevent light escape when the lights are in use. No exterior night-lighting is proposed, which would be consistent with VIS-4. Therefore, no glare or night-lighting would affect adjoining areas and project-specific impacts to visual resources would be less than significant. Although the unpermitted greenhouse is already constructed and in use, it was built in compliance with the visual resources mitigation measures listed above. Conditions of approval will be applied to ensure long-term compliance with these requirements.

Cumulative Impacts: The Greenhouse Program EIR found that the impacts of buildout on aesthetics would be significant and unavoidable (pp. 5.1-1 through 5.1-22 and pp. 10-12 of the Revision Document), and a Statement of Overriding Consideration was adopted. The project, as constructed, complies with all of the applicable mitigation measures and the requirements and development standards of the CA Overlay and is not visible from any public viewing areas. Therefore, the impacts associated with the development of this site would not be cumulatively considerable.

6.2 Water Quality and Groundwater

Impact Discussion: The Greenhouse Program EIR identified three potentially significant impacts to surface water quality and groundwater quality as a result of buildout under the CA Overlay. These impacts would be mitigated to less than significant levels. The following mitigation measures identified in the EIR were incorporated into the final CA Overlay as ordinance requirements and development standards:

- **W-1** requires construction grading to occur during the dry season; otherwise implement an erosion and sediment control plan.
- **W-2** requires the applicant prepare a water quality management plan to include measures to minimize potential impacts to water quality from greenhouse development and operation including; irrigation systems that minimize the potential for polluted runoff, soil conservation techniques, fertilization methods that maximize efficiency of nutrient uptake, and pesticide best management practices, among others.
- **W-3** requires groundwater monitoring when required by the Carpinteria Valley Water District.
- **W-6** requires storage areas for agricultural chemicals to be designed according to specific requirements and reviewed and approved by the Carpinteria-Summerland Fire Protection District.
- **W-7** requires implementation of a Hazardous Materials Business Plan if storage, handling or use of hazardous materials falls within the provisions of AB 2185/2187.

No future grading or construction would occur because the greenhouse is already constructed. Therefore, no impacts to water quality would result from construction activities (W-1).

Surface Water and Groundwater Quality

Although Arroyo Paredon is located along the northern property boundary, surface drainage of the site trends to the south-southwest. The applicant submitted a water quality management plan, which combined with the proposed project, complies with mitigation measure W-2. Within the unpermitted greenhouse, cultivation occurs in the ground using the native soils. The project uses a micro-emitter/drip irrigation system that limits the amount of water used to the amounts necessary for plant growth without generating excess water or irrigation runoff. Fertilizer is applied via drip irrigation using a fertilizer injection system. As a result, irrigation and fertilization does not generate runoff that would affect surface water quality, nor is there significant percolation into the ground. In addition, because the growing field within the unpermitted greenhouse is covered by a permanent impervious roof, no storm water affects the growing area, which minimizes the potential for polluted runoff from leaving the site and affecting area surface water quality. Because groundwater infiltration within the cultivated area is minimal, the potential to affect groundwater quality is also minimized and the Carpinteria Valley Water District would not require groundwater monitoring for this project (W-3). Thus, cultivation within the greenhouse would not cause a significant impact to surface and ground water quality as it relates to this agricultural use.

Consistent with measures W-6 and W-7, the applicant has filed and maintains a Hazardous Materials Business Plan with the Carpinteria-Summerland Fire Protection District. These materials are not stored on the subject property but on the adjacent Ocean Breeze property and only those quantities to be used are transported to the site at the time of use.

The County also has adopted a project-specific threshold indicating a potentially significant impact to surface water quality when a project increases the amount of impervious surfaces on a site by 25% or more (Environmental Thresholds and Guidelines Manual, Revised September 2008). Construction of the unpermitted greenhouse resulted in a 216% increase of impervious surfaces on

the site. Thus, by definition the project could adversely affect surface water quality by increasing the volume of storm water runoff. However, to comply with Flood Control District requirements the project has already incorporated measures to reduce the amount of runoff from impervious surfaces and retard the rate of runoff by incorporating a series of unlined retention basins on the project site. The retention basins collect storm water runoff from the greenhouse roof and slow the rate of runoff. While retained in the basins, water may infiltrate into the ground and evaporate, which reduces the amount of runoff that eventually leaves the site. The basins have been reviewed by Project Clean Water staff and have been found to have more than enough capacity to meet the minimum standards for reducing storm water runoff (Cathleen Garnand, October 8, 2010). Therefore, project specific impacts to water quality would be less than significant.

Groundwater Resources

The Carpinteria Valley Water District (CVWD) would continue to provide irrigation water to the property with the proposed project. Water sources for the CVWD include surface water supplies (Lake Cachuma and the State Water Project) and water wells drawing from the Carpinteria Groundwater Basin. In addition, supplemental irrigation water would continue to be provided from an existing well on the adjacent agricultural property under the same ownership. The Carpinteria Groundwater Basin is not considered to be over-drafted or over-committed and the CVWD will maintain adequate water supplies for the foreseeable future.⁵ The County does not apply thresholds of significance to groundwater basins that are in a state of surplus.

Cumulative Impacts: The County's Environmental Thresholds were developed, in part, to define the point at which a project's contribution to a regionally significant impact constitutes a significant effect at the project level. In this instance, the project has been found not to exceed any threshold of significance for water resources. The project has been designed to comply with the most recent water quality standards and mitigations to address the water quality impact thresholds. Therefore, the project's contribution to the regionally significant issues of water supply and water quality is not cumulatively considerable.

The Greenhouse Program EIR found that the impacts of buildout on water quality and groundwater would be less than significant with implementation of the mitigation measures identified in the EIR (pp. 5.2-1 through 5.2-28 and pp. 12-14 of the Revision Document). The project has been designed to comply with the mitigation measures of the EIR along with newer standards adopted by the County Water Agency. In addition, the project falls within the buildout parameters of the CA Overlay (264,500 sq. ft. comprises 9.6 % of the 2.75 million sq. ft. development cap). Therefore, as proposed, impacts to water quality and groundwater would not be cumulatively considerable.

6.3 Flooding and Drainage

Impact Discussion: The Greenhouse Program EIR identified three potentially significant impacts to flooding and drainage that could be mitigated to less than significant levels as a result of

⁵ *Carpinteria Groundwater Basin Annual Report for 2010*. Prepared by Fugro Consultants Inc. for the Carpinteria Valley Water District. August 3, 2011. Report available at www.cvwd.net/water_supply_sources.htm.

buildout under the CA Overlay. The following mitigation measures identified in the EIR were incorporated into the final CA Overlay as ordinance requirements and development standards and are relevant to the proposed project:

- **F&D-1** requires mitigation for increased storm water runoff through the development of retention basins and other storm water drainage facilities, to be designed in conformance with County Flood Control District and Water Agency (Project Clean Water) standards.
- **F&D-2** requires all final building and drainage plans to be submitted to the County Flood Control District for review and approval.
- **F&D-3** limits post-development runoff to 75% of the calculated predevelopment runoff for 5-100 year storm events.

In addition, the Greenhouse Program EIR identified four thresholds of significance:

- Substantially alter the course or flow of flood water;
- Require the need for private or public flood control projects;
- Expose people or property to flooding by increased density within 100-year flood plains; or
- Substantially accelerate runoff.

Surface drainage of the site trends to the south-southwest, away from the creek. The project site is not located within FEMA mapped floodways or flood plains; however, adjacent and nearby lands could be affected by increases in volume of storm water runoff. Construction of the unpermitted greenhouse resulted in a 216% increase of impervious surfaces on the site and thus, the project could cause an impact to flooding and drainage by increasing the volume of storm water runoff. However, the project has already incorporated a series of unlined retention basins on the project site consistent with measure F&D-1. The applicant submitted a Preliminary Drainage Report⁶ that analyzed the functioning of the four retention basins and concluded that the existing basins are sufficient to meet the minimum standards for retention basins. Flood Control District staff reviewed the report and concurred with this conclusion (Nick Bruckbauer, February 4, 2011) (F&D-2 and F&D-3). Therefore, impacts would be less than significant.

Cumulative Impacts: The Greenhouse Program EIR found that the impacts of buildout on flooding and drainage would be less than significant with implementation of the mitigation measures identified in the EIR (pp. 5.3-1 through 5.3-13 and p. 14 of the Revision Document). The project falls within the buildout parameters of the CA Overlay; therefore, with the implementation of the required measures the impacts associated with the development of the site would not be cumulatively considerable.

6.4 Land Use and Agriculture

Impact Discussion: The Greenhouse Program EIR identified three potentially significant impacts to land use and agriculture:

⁶ *Preliminary Drainage Report for 3883 Foothill Road, Carpinteria, CA APN: 005-310-24.* MAC Design Associates. January 31, 2011.

1. Conflicts with adjacent residential uses (significant and unavoidable);
2. Placement of permanent structures and pavement on prime soils (mitigable to less than significant levels); and
3. New greenhouses could result in physical changes to the environment that could interfere with or disrupt existing agricultural operations that are located in the study area (less than significant).

The EIR also identified a significant and unavoidable cumulative impact to land use and agriculture due to land use conflicts on a valley-wide basis. The following mitigation measures identified in the EIR were incorporated into the final CA Overlay as ordinance requirements and development standards:

- **LU/AG-1** requires additional setbacks for new greenhouse development.
- **LU/AG-2** requires a landscape plan to provide visual screening of all structures and parking areas from adjacent roadways and view corridors.
- **LU/AG-3** sets the maximum height of structures at 30 feet.
- **LU/AG-4** requires minimization of hardscape, such as parking lots, loading bays, and interior walkways within greenhouses, to preserve prime soils.

As built, the project complies with the mitigation measures that were adopted into the CA Overlay to mitigate potential, site specific land use impacts. The subject property is an interior lot, is not located adjacent to residentially-zoned property, and there is one residential dwelling located approximately 50 feet of the parcel boundary. Therefore, the applicable setbacks are 20 feet from the lot lines, 100 feet from the top-of-bank or edge of riparian habitat of natural creek channels, and 50 ft. from the parcel line near the residence. As depicted on the project plans, the project complies with all of these setbacks and thus, complies with measure LU/AG-1. The unpermitted greenhouse is 17 feet 7 inches in height and the previously permitted greenhouses are 15 feet in height (LU/AG-3). A landscape plan has been submitted (LU/AG-2) and would be consistent with the EIR-required visual resources mitigation measures discussed under Section 6.1 above. Consistent with LU/AG-4, the project has minimized hardscape by: cultivating in the native soil; limiting interior hardscape to three parallel access ways; and using unpaved parking and driveways around the project site. In addition no packing or shipping building is proposed and therefore, there would be no loading bays.

As reported by the applicant, the proposed project would not result in an increase in employment. The greenhouse is operated by Ocean Breeze International in combination with adjacent and nearby greenhouse properties. The employees of the project site report to work on the adjacent properties and travel internally to and from the site. The project would not result in a net loss of housing units and would not result in a need for new sewers or roads. Therefore, the project would not result in growth or concentration of population, would not extend sewer lines or access roads, would not result in loss of affordable dwellings or displace any existing housing, would not displace any people, would not create an economic or social effect that would result in a physical change, and would not conflict with adopted airport safety zones as there is no airport in the Carpinteria Valley. Project specific land use impacts would be less than significant.

According to the County's *Environmental Thresholds and Guidelines Manual* (revised 2006) Agricultural Resource Guidelines, if a proposed project renders a viable agricultural parcel non-viable, the project would have a significant agricultural impact. As a general guideline, an agricultural parcel is considered viable if it is of sufficient size and capability to support an agricultural enterprise independent of any other parcel. In addition, the *Thresholds* provide a numeric assessment to compare the viability of a property before and after the project. This weighted points system assigns relative values to particular physical characteristics of a site's agricultural productivity (e.g., soil type, water supply, lot size, and zoning, among others). If the formula totals 60 points or more, the property is considered agriculturally viable. A cursory assessment would indicate a point value of approximately 67-70 with no change after the project (i.e., replacing the orchard crop with a greenhouse using in ground cultivation would not change the points assigned to any physical characteristic of the property). Thus, the property is agriculturally viable and would remain so with the project. Thus, no impacts to agricultural resources on the property would result.

Cumulative Impacts: The Greenhouse Program EIR found that the impacts of buildout on land use and agriculture would be significant and unavoidable (pp. 5.4-1 through 5.4-20 and pp. 15-16 of the Revision Document), and a Statement of Overriding Consideration was adopted. The project falls within the buildout parameters of the CA Overlay. As constructed, it complies with all of the applicable mitigation measures and the requirements and development standards of the CA Overlay including: landscape screening, greenhouses that are more than 40% lower than the maximum allowed height, in-ground cultivation, and minimal paving. Therefore, the impacts to Land Use and Agriculture associated with the development of the site would not be cumulatively considerable.

6.5 Traffic

Impact Discussion: The Greenhouse Program EIR analyzed full buildout under the CA Overlay of 2.75 million sq. ft. of new greenhouse development within Area A, and identified two significant and unavoidable impacts to traffic and three less than significant impacts. The following mitigation measures identified in the EIR, relevant to the proposed project, were incorporated into the final CA Overlay as ordinance requirements and development standards:

- **T-1** requires payment of mitigation fees if a project contributes peak hour trips to the Santa Monica/Via Real/U.S. 101 interchange and/or the Linden Avenue/Southbound U.S. 101 interchange.
- **T-2** requires a focused traffic analysis for each greenhouse project application to assess the number of peak hour trips sent to the interchanges identified in T-1.
- **T-5** requires all parking, including employee parking and deliveries, to be accommodated on site.

Traffic Generation

Based on the existing production of the unpermitted greenhouse, the applicant does not anticipate the need for additional employees and therefore increases in employee related vehicle trips would not occur. Employee and visitor parking are accommodated on the adjacent Ocean Breeze Nursery

properties (APNs 005-430-042 and 005-430-043), which take access from Via Real. Access to the project site by employees is via internal circulation on foot or by electric cart from the adjacent Ocean Breeze properties. All products grown on the subject lot are moved by internal circulation to the adjacent property for packing and shipping from an existing packing house. According to the applicant no additional trips associated with packing and shipping have been generated by the unpermitted greenhouse because the additional produce is accommodated by Ocean Breeze's pre-existing packing and shipping program.

Although the as-built unpermitted greenhouse did not generate new traffic based on the applicant's reported business operations and traffic study, submitted in compliance with measure T-2, given the greater flexibility of crop type that may be grown within a greenhouse, operations could change in the future, especially with a change in property or business ownership. Therefore, a reasonable worst case scenario traffic impact analysis must be considered using the greenhouse traffic generation factors developed in the Greenhouse Program EIR for use with these projects in the Carpinteria Valley. These traffic generation factors were developed based on data related to square footage of greenhouse structures and traffic generation for greenhouses and nurseries in the Carpinteria area. The data were collected during environmental review for the Greenhouse Program and used to determine the impacts to traffic resulting from full buildout of 2.75 million sq. ft. of new greenhouses under the CA Overlay.

Based on the size of the unpermitted greenhouse (264,500 sq. ft.), the proposed project would generate traffic using the Greenhouse Program EIR generation factors below.

Greenhouse Traffic Generation Factors

0.27 average daily trips (ADT) per 1,000 square feet	$0.27 \times 264.5 = 72 \text{ ADT}$
0.03 a.m. peak hour trips (PHT) per 1,000 square feet	$0.03 \times 264.5 = 8 \text{ a.m. PHT}$
0.06 p.m. PHT per 1,000 square feet	$0.06 \times 264.5 = 16 \text{ p.m. PHT}$

The Greenhouse Program EIR identified only two intersections that would be significantly impacted: Santa Monica/Via Real/Highway 101 northbound ramp and Linden Avenue/Highway 101 southbound ramp. At the time, these intersections were determined to be operating at Levels of Service (LOS) D and E, respectively, during the afternoon peak hour. Given the location of the project site, no trips would be distributed to the Linden Avenue/South Bound Highway 101 intersection.⁷

More recent traffic data provided by the City of Carpinteria indicates that the Santa Monica/Via Real/Highway 101 intersection is operating at LOS E during the morning peak and LOS C during the afternoon peak.⁸ All of the other intersections in the area were operating, and continue to operate, at acceptable Levels of Service (LOS A-C), including Cravens Lane/Highway 192 (LOS A) and Cravens Lane/Via Real (LOS B). Area roadways operate at LOS A and LOS B. No significant decreases in Levels of Service were identified.

⁷ Will Robertson, County Public Works personal communications January 14, 2013

⁸ Will Robertson, County Public Works personal communications February 22, 2013

The County's adopted Environmental Thresholds and Guidelines Manual identifies a significant impact to intersections when a project would increase the volume-to-capacity by the values listed in the table below. The City of Carpinteria uses the same impact significance thresholds for each Level of Service, C through F, respectively (City of Carpinteria General Plan and Local Coastal Plan Circulation Element, April 2003). Significant impacts are typically determined based on Levels of Service during the afternoon (p.m.) peak hour.

LEVEL OF SERVICE (including project)	INCREASE IN V/C GREATER THAN
A	0.20
B	0.15
C	0.10
	Or The Addition Of:
D	15 trips
E	10 trips
F	5 trips

If the 16 p.m. peak hour trips (PHT) that would be generated by the project under the worst case scenario above are distributed onto the local street network, four PHT would be distributed to the Santa Monica/Via Real/Highway 101 intersection, below the threshold for an intersection operating at Level of Service C. Although typical traffic analyses do not consider the morning peak hour for significant impacts, the most recent data indicate that the Santa Monica/Via Real/Highway 101 intersection is operating at LOS E during the morning peak. If the eight a.m. PHT that would be generated under the worst case scenario are distributed onto the local street network, two PHT would be distributed to this intersection, also below the significance threshold for an intersection operating at LOS E.⁹ Therefore, the project specific impacts to traffic (transportation/circulation) would be less than significant.

Mitigation T-1 from the Greenhouse Program EIR requires the payment of mitigation fees as a pro-rated contribution towards future interchange improvements for projects that distribute trips to the Santa Monica/Via Real/Highway 101 intersection. However, to implement this mitigation measure the County must adopt a Transportation Improvement Plan (TIP) for the Carpinteria area in cooperation with the City of Carpinteria to identify the improvements and determine the specific mitigation fees for those improvements. A TIP has not been completed; therefore, the mitigation measure currently has no force or effect. Separate from the determination of project specific impacts herein, and consistent with the County's transportation thresholds, the County established a transportation impact mitigation fee program requiring payment of a transportation impact mitigation fee for new development. This fee program was adopted by the Board of Supervisors for projects on the South Coast of Santa Barbara County. The fee is calculated based on the number of afternoon PHT generated by the project. Therefore, while not a required mitigation measure pursuant to this EIR Addendum, the fee would be required as a condition of approval for the Development Plan.

⁹ Will Robertson, County Public Works personal communications January 14, 2013

Parking

Mitigation T-5 requires that all parking be accommodated on site. The Greenhouse Program EIR did not provide a greenhouse-specific parking needs analysis; therefore, the standard parking requirements of Article II apply. Article II requires two parking spaces per acre of land in a greenhouse use. Based on the total area of greenhouses on the property (386,600 sq. ft. or 8.9 acres), 18 parking spaces would be required. However, the applicant has requested development plan modifications to reduce the parking requirement to 11 spaces, to allow the uncovered parking to be unpaved, and to waive certain design specifications for marking and striping. The reason for the modification request is based on the operational needs of the existing flower growing operation. The applicant submitted information detailing the actual labor and number of employees needed to staff the nursery operation in the greenhouses on the subject property, which would result in a need for 11 parking spaces instead of the ordinance required 18. Currently, the nursery is operated as part of the Ocean Breeze Nursery and employee and visitor parking is accommodated on the nearby Ocean Breeze Nursery properties (APNs 005-430-042 and 005-430-043). Access to the project site by employees is via internal circulation on foot or by electric cart from the adjacent Ocean Breeze properties. All products grown on the subject lot are moved by internal circulation to the adjacent property for packing and shipping. As proposed, the project would comply with Mitigation T-5 and therefore, impacts would be less than significant.

Cumulative Impacts: The Greenhouse Program EIR methodology assumed cumulative buildout of other projects in the area, including buildout of the Toro Canyon Plan. The EIR found that the impacts of buildout on traffic would be significant and unavoidable (pp. 5.5-1 through 5.5-24 and pp. 16-17 of the Revisions Document), and a Statement of Overriding Consideration was adopted. The project falls within the buildout parameters of the CA Overlay. As constructed, it complies with all of the applicable mitigation measures and the requirements and development standards of the CA Overlay to the extent feasible. Therefore, the impacts to traffic associated with the development of the site would not be cumulatively considerable.

6.6 Air Quality

Impact Discussion: The Greenhouse Program EIR identified two air quality impacts, one significant but mitigable and one less than significant. The following mitigation measure identified in the EIR was incorporated into the final CA Overlay as a development standard:

- **AQ-5** requires use of low NOx boilers, heaters, etc. in new greenhouse operations.

No heaters or boilers are utilized or proposed and therefore, the greenhouse would not generate any NOx compounds. In addition, because the project would not use heaters or boilers no greenhouse gases would be generated. As a result there would be no impacts to air quality and the project complies with measure AQ-5.

Cumulative Impacts: The Greenhouse Program EIR found that the impacts of buildout on air quality would be less than significant with implementation of the mitigation measures identified in the EIR (pp. 5.6-1 through 5.6-10 and pp. 17-18 of the Revisions Document). The project falls within the buildout parameters of the CA Overlay, and as constructed, complies with all of the

applicable mitigation measures (listed above) and the requirements and development standards of the CA Overlay. Therefore, the impacts associated with the development of the site would not be cumulatively considerable.

6.7 Noise

Impact Discussion: The Greenhouse Program EIR identified three noise impacts, two significant but mitigable and one less than significant. The following potentially applicable mitigation measures identified in the EIR were incorporated into the final CA Overlay as ordinance requirements and development standards:

- **N-3** requires industrial fans and heaters be designed such that external sound levels do not exceed 65 dB(A) at the property line.
- **N-4** requires any paging or broadcast system within greenhouses be limited to levels that are not audible at the property line.
- **N-5** requires location of packing and distribution facilities, loading docks and delivery bays centrally within the greenhouse operation with additional minimum setback requirements.

No heaters or paging or broadcast systems are used on the property; the applicant uses cell phones to contact employees. In addition, there are no packing and distribution facilities or loading docks on site and none are proposed. All crops are transferred by cart internally to the adjacent Ocean Breeze properties for packing and distribution. Thus, the project, as designed, complies with measures N-3 and N-4. Fans, which are fully contained within the greenhouses, are used inside to provide air circulation when needed. The fans' decibel rating is 56 dB(A)¹⁰; thus, they would not generate significant noise outside and, consistent with measure N-3, would not exceed 65 dB(A) at the property line. Thus, noise impacts would be less than significant.

Cumulative Impacts: The Greenhouse Program EIR found that the impacts of buildout on noise would be less than significant with implementation of the mitigation measures identified in the EIR (pp. 5.7-1 through 5.7-9 and pp. 18-19 of the Revisions Document). The project falls within the buildout parameters of the CA Overlay, and as constructed, complies with all of the applicable mitigation measures (listed above) and the requirements and development standards of the CA Overlay. Therefore, the impacts associated with the development of the site would not be cumulatively considerable.

6.8 Biological Resources

Impact Discussion: The Greenhouse Program EIR identified five significant but mitigable impacts (Class II) to biological resources, one less than significant impact (Class III), and one significant and unavoidable (Class I) cumulative impact. Impacts were identified to aquatic flora and fauna, which would result from negative changes to water quality, to habitat corridors and linkages, and to foraging areas as a result of converting open field agriculture to greenhouse agriculture. The EIR concluded that mitigation measures identified elsewhere in the EIR,

¹⁰ Bradley Miles, agent for the owner. October 4, 2010.

including W-1, W-2, W-4 through W-7, F&D-1 through F&D-3, VIS-2, and VIS-4, would reduce impacts to biological resources to less than significant levels. Although the unpermitted greenhouse is already constructed and in use, it was built in compliance with those mitigation measures that would be applicable to this project, as discussed below.

The development plan would permit an existing unpermitted greenhouse that was developed in an area previously devoted to fruit orchard cultivation (avocados). Approximately 6.9 acres of orchard were removed to accommodate the new greenhouse and adjacent retention basins. On a site specific basis, the orchard may have provided some foraging and nesting areas for local fauna; however, overall habitat functions were low and the orchard did not function as habitat for threatened or endangered species. The unpermitted greenhouse meets minimum setbacks from Arroyo Paredon Creek (LU/AG-1), does not propose exterior lighting (VIS-4), and uses black screens to minimize the amount of light that could spill from the greenhouse interior when grow lights are employed (VIS-2). The greenhouse employs a drip irrigation system to minimize the amount of agricultural runoff that would leave the site (W-2) and retention basins collect storm water runoff from the greenhouse roof (F&D-1 and F&D-2). Agricultural chemicals are stored offsite and the applicant has a Hazardous Materials Business Plan on file with the Carpinteria-Summerland Fire Protection District (W-6 and W-7). Together, these measures would retard the amount of runoff, retain a more natural runoff regime, and minimize pollutants that could enter natural waterways. Thus, with all of these components already incorporated into the project as required by the Greenhouse EIR mitigation measures listed above, impacts to biological resources would be less than significant.

Cumulative Impacts: The Greenhouse Program EIR found that the impacts of buildout on biological resources would be significant and unavoidable (pp. 5.8-1 through 5.8-11 and pp. 19-20 of the Revision Document), and a Statement of Overriding Consideration was adopted. The project falls within the buildout parameters of the CA Overlay. As constructed, the project complies with all of the applicable mitigation measures and the requirements and development standards of the CA Overlay. Therefore, the impacts associated with the development of the site would not be cumulatively considerable.

6.9 Other Issue Areas

Section 6.0 of the Greenhouse Program EIR analyzed the potential for the Greenhouse Program to cause growth-inducing impacts and irreversible environmental change. The EIR concluded that the potential to create an estimated 140 new jobs would be well within employment growth projections and would not cause substantial unplanned growth effect. The EIR also concluded that new construction of greenhouses and conversion of open field agriculture would not cause significant impacts. The proposed project falls well below the maximum buildout analyzed under the Greenhouse Program and therefore would not change these conclusions.

In addition, Section 6.0 determined impacts to be less than significant to housing, wastewater, cultural resources and hazardous materials. The proposed project would not change these conclusions because it would not induce substantial population growth, would not displace housing or people, and would not require the construction of a new wastewater disposal system as restroom

facilities for employees are available at the adjacent Ocean Breeze Nursery, which farms the project site. Based on records on file at P&D, no cultural resources are recorded within the proposed project area. Cultivation is ongoing in the native soil continuing decades of cultivated agriculture on the project site. The only hazardous materials that have been used in the past and are currently being used include several agricultural fertilizers, pesticides, herbicides, and one fungicide. As discussed in Section 5.4 of the Greenhouse Program EIR (Land Use and Agriculture), agricultural chemicals are regulated by federal and state laws and fall under the jurisdiction of the County Agricultural Commissioner's office. The applicant has filed and maintains a Hazardous Materials Business Plan with the Carpinteria-Summerland Fire Protection District consistent with federal and state laws and the development standards of the CA Overlay (mitigation measures W-6 and W-7 of the Greenhouse Program EIR). These materials are stored on the adjacent Ocean Breeze property and only those quantities to be used are transported to the site at times of use. These materials are not stored on the subject property. Therefore, the project would not cause any of the conditions described in Section 15162 of the CEQA Guidelines that call for the preparation of a subsequent EIR.

The project is not located within a High Fire Hazard Area, and does not involve new fire hazards. The project is located in an area with an adequate response time from fire protection services. The proposed project site does not have substantial geological constraints or slopes exceeding 20%. No structures or formal landscape features greater than 50 years in age currently exist on or adjacent to the project site or existed prior to construction of the unpermitted greenhouse. Thus, there is no potential for historic resources to be present. Existing police protection and health care service levels would be sufficient to serve the proposed project. No established recreational uses, including biking, equestrian or hiking trails, or parks are located on the proposed project site, nor would the project affect nearby proposed trail corridors as none occur on the property. Therefore, the project would not cause any of the conditions described in Section 15162 of the CEQA Guidelines that call for the preparation of a subsequent EIR.

6.10 Mitigation and Residual Impact

As discussed throughout this document, the proposed project would not create any new potential environmental impacts. Therefore, no additional mitigation is required. Residual project impacts would be less than significant.

Findings:

It is the finding of the Planning and Development Department that the previous EIR as herein amended may be used to fulfill the environmental review requirements of the current project. Because the current project meets the conditions for the application of State CEQA Guidelines Section 15164, as discussed below, preparation of a new EIR is not required.

15164(a) The lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.

15164(e) *A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's required findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.*

The Carpinteria Valley Greenhouse Program Revised Final EIR (99-EIR-02 RV 1) analyzed impacts associated with the creation and implementation of the Carpinteria Agricultural Overlay District (CA Overlay). The CA Overlay mapped 11 parcels with a view corridor designation that requires compliance with additional development standards. The proposed project consists of two separate but related activities. The first is a Zoning Map Amendment that would revise the CA Overlay map to remove the view corridor designation from the subject parcel. This is the only proposed change to the CA Overlay and the Carpinteria Valley Greenhouse Program that was analyzed by 99-EIR-02 RV 1. The second part of the project is a Development Plan to legalize the as-built construction of greenhouse development on the subject lot, which would be consistent with the requirements of the CA Overlay if the Zoning Map Amendment is approved.

The proposed project requires an Addendum to the certified EIR to address the changes outlined above; however, as analyzed in this addendum and discussed below, none of the conditions described in CEQA Guidelines Section 15162 calling for the preparation of a subsequent EIR have occurred.

15162 (a) *When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:*

(1) *Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;*

As analyzed in this addendum, the changes to the project, removal of a view corridor designation from one parcel and approval of greenhouses constructed consistent with the project for which the EIR was certified, are minor and are not substantial and do not require major revisions to the previous EIR. The subject parcel is minimally visible from U.S. Highway 101 and Via Real and not visible Foothill Road. The greenhouse, as constructed, is 7'5" lower than the maximum height of 25' allowed under the view corridor designation and 12'5" lower than the maximum height of 30' allowed with removal of the view corridor designation. As constructed the greenhouse complies with all of the other development standards of the CA Overlay adopted to mitigate significant impacts. Thus, no new significant impacts would result from the proposed changes, and there would not be a substantial increase in the severity of previously identified significant effects.

(2) *Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or*

In this instance there have been no substantial changes to the circumstances under which the project is being undertaken. As discussed in detail in this Addendum, the visual character of the area has not changed significantly, no environmental parameters such as water quality and flood hazard areas have been provided to document deteriorating conditions, and area roadways and intersections continue to operate at acceptable levels of service. Recent traffic data indicate that there has been no substantial change to the traffic situation. Therefore, no major revisions of the EIR are necessary.

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:

- (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;*
- (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;*
- (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or*
- (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.*

No new information of substantial importance that was not known and could not have been known at the time the EIR was certified has been identified. Therefore, the project would not have significant effects not discussed in the EIR, significant effects previously examined will not be more severe, mitigation measures or alternatives previously found not to be feasible would not now be found feasible, and there are no mitigation measures or alternatives that would be different than those analyzed in the EIR. Thus, only the proposed change to the project has been fully analyzed in this addendum and because none of the conditions in CEQA Guidelines Section 15162 have occurred, no subsequent EIR or ND shall be prepared for this project.

Discretionary processing of the Van Wingerden Greenhouses (Case Numbers 11RZN-00000-00001, 10DVP-00000-00010 and 11CDP-00000-00009) may now proceed with the understanding that any substantial changes in the proposal may be subject to further environmental review.