

Executive Summary

This section of the Environmental Impact Report (EIR) for the Hoop Structures Ordinance Amendment (Project) summarizes the characteristics of the Project, alternatives, environmental impacts, mitigation measures, and residual impacts.

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Project Location

The Project applies to approximately 927,014 acres within all Agricultural I (AG-I) and Agricultural II (AG-II) zoned areas within the unincorporated, Inland Area of the County of Santa Barbara (County). The County is located on the Pacific Coast of California, extending approximately 45 miles north from the south-facing coastline and approximately 65 miles inland from the west-facing coastline. The County is bounded to the east by Ventura County, to the south and west by the Pacific Ocean, and to the north and northeast by San Luis Obispo and Kern counties.

Background

In the Inland Area, hoop structures and shade structures are not specifically identified within the Land Use Development Code (LUDC) as allowable uses on lands zoned for agriculture. However, hoop structures would be permitted in the same manner as greenhouses in areas regulated by the LUDC, requiring a Land Use Permit for less than 20,000 square feet, and a Development Plan for 20,000 square feet or more, which also requires environmental review and a hearing before the Planning Commission (LUDC Section 35.42.140).

On April 19, 2016, the Board of Supervisors adopted an amendment to the County Building Code that increased the maximum allowable height for hoop structures – from 12 feet to 20 feet – without the issuance of a building permit. Prior to this amendment, in 2011, the Building Code first exempted “readily removable plastic covered hoop structures without in

ground footings or foundations that are not more than 12 feet in height.” The Building Code also does not require a building permit for “shade cloth structures constructed for nursery or agricultural purposes.”

The Board of Supervisors included the Project in the Long Range Planning Division’s 2017-2018 Annual Work Program, directing an ordinance amendment to exempt hoop structures from planning permits in the Inland Area consistent with the Building Code exemption from building permits. The similarity of shade structure issues with hoop structure issues warrants their inclusion in this ordinance amendment.

The Project is intended to simplify and streamline the permit process for hoop structures and shade structures to allow farmers more flexibility and efficient agricultural operations in support of the County’s agricultural economy.

Project Description and Objectives

The purpose of the Project is to amend the County’s LUDC to revise and clarify the permitting requirements for hoop structures and shade structures on agriculturally zoned lands in the inland, unincorporated areas of Santa Barbara County.

The California Environmental Quality Act (CEQA) Guidelines Section 15124(b) requires that the EIR project description include a statement of objectives of the proposed Project. The primary objectives of the Project are to:

- Simplify and streamline the permit process for hoop structures and shade structures to allow farmers more flexibility and efficient agricultural operations in support of the County’s agricultural economy.
- Exempt hoop structures and shade structures of a given height from planning permits on agriculturally zoned lands in the Inland Area.
- Identify development standards with which hoop structures and shade structures must comply in order to be exempt from planning permits.
- Clarify permit requirements for taller hoop structures and shade structures.
- Apply development standards and best management practices to hoop structure and shade structure uses to reduce or minimize potential adverse effects.

Alternatives

As required by CEQA Guidelines Section 15126.6, this EIR examines a reasonable range of alternatives to the Project that potentially minimize environmental impacts while achieving most of the main objectives. The alternatives assessed in this EIR include the No Project Alternative; Alternative 1: Furtherance of Policy Consistency, and Alternative 2: Visual Character and Scenic Views Protection. The No Project Alternative would not amend the County LUDC to change the current regulatory mechanisms which govern the use of

crop protection structures on land zoned AG-I and AG-II in the unincorporated inland areas. Crop protection structures would continue to be permitted as greenhouses in areas regulated by the LUDC. However, hoop structures would be permitted in the same manner as greenhouses in areas regulated by the LUDC, requiring a Land Use Permit for less than 20,000 square feet, and a Development Plan for 20,000 square feet or more, which also requires environmental review and a hearing before the Planning Commission (LUDC Section 35.42.140). Alternative 1: Furtherance of Policy Consistency would apply additional development standards in order to qualify for an exemption including the following:

- shall be located no less than 100 feet from native plant communities and environmentally sensitive habitat areas,
- shall not exceed a height of 12 feet within 200 feet of the edge of right-of-way of a public road or any designated State Scenic Highway, and
- shall not exceed a height limit of 12 feet within the Critical Viewshed Corridor Overlay.

Alternative 1 would also add a Zoning Clearance permit path for crop protection structures no more than 20 feet in height located on agriculturally zoned lands not historically cultivated with agriculture. The Zoning Clearance permit would require that the applicant shall consult with the appropriate agency (U.S. Fish and Wildlife Service and/or California Department of Fish and Wildlife) to comply with any regulations necessary to protect rare, endangered, or threatened species, and submit documentation that such consultation has been completed.

This analysis finds that Alternative 1 is the environmentally superior alternative, as it would further reduce residual impacts related to land use (consistency with plans and regulations), visual resources, and biological resources. Alternative 1 would maximize reductions in potentially significant impacts while attaining most of the objectives of the Project.

Required Actions and Approvals to Implement the Project

The following actions are required in order to implement the Project:

1. Make findings for approval, including CEQA findings.
2. Certify the Final EIR, and, if needed, adopt a Statement of Overriding Considerations for any unavoidable, significant environmental impact that would result from the Project.
3. Adopt amendments to the LUDC to address the permit requirements of hoop structures and shade structures.

Environmental Analysis

This EIR addresses all potentially significant environmental impacts associated with the Project as determined in the Notice of Preparation for the Hoops Structure Ordinance Amendment, responses to the Notice of Preparation, and input at the EIR Scoping Meeting. Potentially significant impacts on the following environmental resources are addressed in detail:

- 4.1 Land Use and Development
- 4.2 Aesthetics/Visual Resources
- 4.3 Agricultural Resources
- 4.4 Water Resources and Flooding
- 4.5 Resource Recovery and Solid Waste
- 4.6 Biological Resources

Areas of Known Controversy

The Notice of Preparation process and subsequent response from agencies and the public have identified concerns regarding the following issues: California Department of Fish and Wildlife and United States Fish and Wildlife Service concerns regarding potential impacts to California tiger salamander habitat; concerns from agricultural stakeholders regarding the potential addition of onerous requirements associated with installation of hoops structures and shade structures (crop protection structures) that would limit flexibility for farmers; and concerns from the public regarding the potential visual impacts of crop protection structures.

Issues to be Resolved

Issues to be resolved include how to reduce programmatic significant, unavoidable adverse environmental impacts associated with the Project to the maximum extent feasible while achieving Project objectives, by adoption of mitigation measures and/or alternatives to the Project identified in the EIR.

Summary of Impacts and Mitigation Measures

The summary table, Table S-1, located at the end of this chapter, summarizes the identified environmental impacts for each issue area identified during the environmental analysis completed for the Project. The table also includes mitigation measures to reduce or avoid the environmental effects, with a conclusion as to whether the impact would be mitigated to below a level of significance. The mitigation measures listed in Table S-1 are also discussed within each relevant topical area. Each impact listing also contains a statement of the significance determination for the environmental impact as follows: Class I impacts are defined as significant, unavoidable adverse impacts, which require a statement of overriding considerations to be issued per Section 15093 of the CEQA Guidelines if the project is approved. Class II impacts are significant adverse impacts that can be feasibly

mitigated to less than significant levels and which require findings to be made under Section 15091 of the CEQA Guidelines. Class III impacts are considered less than significant impacts. Class IV effects are those for which the Project's impact would be beneficial. In addition to Table S-1, a list of impacts by class is also provided below.

Class I – Unavoidable Adverse Impacts

Aesthetics/Visual Resources: Visual Character Changes

Aesthetics/Visual Resources: Public Scenic Views and Scenic Resources

Aesthetics/Visual Resources: Light and Glare (direct and cumulative)

Aesthetics/Visual Resources: Cumulative

Resource Recovery and Solid Waste (direct and cumulative)

Class II – Significant Impacts that can be Mitigated to Less than Significant

Biological Resources: Sensitive Habitats or Sensitive Natural Communities

Biological Resources: Movement or Patterns of any Native Resident or Migratory Species

*Biological Resources: Conflicts with Adopted Local Plans, Policies, or Ordinances Oriented
Towards the Protection and Conservation of Biological Resources*

Biological Resources: Unique, Rare, Threatened, or Endangered Plant or Wildlife Species

Biological Resources: Cumulative Impacts (all issue areas)

Water Resources: Flooding

Class III – Less Than Significant Impacts

Agricultural Resources: Land Use Compatibility/Agricultural Interface (Indirect Impacts)

Agricultural Resources: Cumulative

Land Use: Conflicts with Applicable Land Use Plan, Policy, or Regulation.

Land Use: Land Use Compatibility

Land Use: Cumulative

Water Resources: Water Quality

Water Resources: Groundwater Supply

Water Resources: Runoff and Drainage

Water Resources: Cumulative

Class IV – Beneficial Impacts

Agricultural Resources: Direct Conversion of Prime Agricultural Land.

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Table S-1. Summary of Environmental Impacts, Mitigation Measures, and Significance after Mitigation

Issue	Impact	Mitigation Measures	Significance After Mitigation	Impact Classification
Land Use and Planning				
<i>LU-1: Conflicts with Applicable Land Use Plan, Policy, or Regulation</i>	The Project would be consistent with the Comprehensive Plan in that it seeks to protect and support the viability and sustainability of agricultural land uses. The Project would support Comprehensive Plan policies to preserve cultivated agriculture in Rural Areas, support environmentally sustainable production methods, and provide necessary flexibility to farmers regarding methods of cultivation. The Project would also be consistent with the County Building Code, which provides that a building permit is not required for “shade cloth structures constructed for nursery or agricultural purposes” or for hoop structures that are 20 feet or less in height. <u>Crop protection structures taller than 20 feet would be permitted in the same manner as greenhouses in areas regulated by the LUDC, requiring a Land Use Permit for less than 20,000 square feet, and a Development Plan for 20,000 square feet or more, which also requires environmental review and a hearing before the Planning Commission (LUDC Section 35.42.140).</u> In addition, the Project would require the preparation of a Development Plan for crop protection structures over 20 feet tall. Implementation of a <u>Land Use Permit or Development Plan</u> permit for such structures would ensure crop protection structures comply with the ordinance development standards included within the proposed LUDC amendment that address neighborhood compatibility. Overall, potential conflicts with applicable land use plans, policies, or regulations would be less than significant.	None required.	Impacts would be less than significant.	Class III
<i>LU-2: Land Use Compatibility</i>	The Project incorporates features that would address potential land use incompatibility, such as requiring a Development Plan permit for hoop structures and shade structures taller than 20 feet in the AG-I and AG-II zones and allowing the permit exemption for hoop structures and shade structures located within the Gaviota Coast Critical Viewshed Corridor Overlay only if they do not exceed 4,000 square feet per lot. The Project also specifies that in order to qualify for the permit exemption, hoop structures and shade structures shall not have electrical wiring, plumbing, mechanical, permanent footings, or foundations, and shall only be used to protect plants grown in the soil or in containers upon the soil. For crop protection structures taller than 20 feet that require a Development Plan permit, those structures would be regulated as greenhouses and would require landscaping to be installed that complies with Section 35.34.050, Agricultural Zones Landscaping Requirements. Regarding neighborhood incompatibility impacts, the policy goals of the County that support and encourage agricultural land uses within agricultural zones further support that the use of crop protection structures would be compatible with land uses within AG-I and AG-II zoned lands as those lands are intended to support and encourage agricultural production. Overall, potential land use incompatibility impacts would be less than significant.	None required.	Impacts would be less than significant.	Class III
<i>Cumulative Impacts Analysis</i>	Regarding cumulative land use plan consistency impacts, the Project would implement a number of Comprehensive Plan policies that support agricultural production within Rural Areas and support providing flexibility to farmers regarding the method of operation in order to maintain agricultural competitiveness. In addition, the cumulative projects identified in Tables 3-5 and 3-6 would also be consistent with applicable policies, as policy consistency <u>must be determined when would be a required element of approving these projects, supportive of agriculture as they would support growth of a cannabis industry in the County and streamline permitting requirements for agricultural land uses.</u> Therefore, a significant cumulative impact related to land use was not identified when considering cumulative projects in combination with the Project. Therefore, cumulative impacts would be less than significant.	None required.	Impacts would be less than significant.	Class III

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Aesthetics/Visual Resources				
<p><i>VIS-1: Visual Character Changes</i></p>	<p>The Project could alter the visual character of certain areas, as seen from public viewing locations, where crop protection structures are located adjacent to urban townships, or within County Urban Areas, Existing Developed Rural Neighborhoods, and Inner Rural Areas. The potential expansion of crop protection structures could further alter existing agricultural landscapes by further reducing public views of cultivated fields and crops to views dominated by crop protection structures. Crop protection structures taller than 20 feet could further affect visual character as taller structures could provide a greater contrast between the character of an open agricultural field and an agricultural operation with taller crop protection structures. These visual changes can affect the overall scenic quality enjoyed by residents and visitors in the County, resulting in a potentially significant impact. Therefore, impacts would be potentially significant.</p>	<p>MM-VIS-1. Height and Setback Requirements. Prior to approval of the Project, the Hoop Structures Ordinance Amendment shall be revised so that, in addition to the standard structural setback in each zone, to qualify for the permit exemption crop protection structures:</p> <ul style="list-style-type: none"> • Shall not exceed a height of 12 feet within 75 feet of the edge of right-of-way of a public road or any designated State Scenic Highway. <p>MM-VIS-2. Urban Township Setback Requirement. Prior to approval of the Project, the Hoop Structures Ordinance Amendment shall be revised as follows:</p> <ul style="list-style-type: none"> • Crop protection structures shall be setback 400 feet from the urban boundary line of the following urban townships: Santa Ynez, Ballard, Los Olivos, Los Alamos, Casmalia, Sisquoc, Garey, New Cuyama, and Cuyama. Crop protection structures that cannot be viewed from public roadways or other areas of public use shall be exempt from the above setback requirement. Landscape screening shall not be taken into consideration when determining whether the structure is visible from public roadways or other areas of public use <p>MM-VIS-3. Design Control (D) Overlay Limitation. Prior to approval of the Project, the Hoop Structures Ordinance Amendment shall be revised as follows:</p> <ul style="list-style-type: none"> • Crop protection structures shall be limited to 4,000 square feet per lot when located within the Design Control (D) Overlay within the Santa Ynez Valley Community Plan area. Crop protection structures that cannot be viewed from public roadways or other areas of public use shall be exempt from the above setback requirement. Landscape screening shall not be taken into consideration when determining whether the structure is visible from public roadways or other areas of public use. 	<p>With implementation of MM-VIS-1, MM-VIS-2, and MM-VIS-3, impacts would be partially mitigated. However, after mitigation, impacts would remain significant and unavoidable.</p>	<p>Class I</p>

Table S-1. Summary of Environmental Impacts, Mitigation Measures, and Significance after Mitigation

Issue	Impact	Mitigation Measures	Significance After Mitigation	Impact Classification
<i>VIS-2: Public Scenic Views and Scenic Resources</i>	<p>The Project would have a potentially significant visual impact related to views and scenic resources from the following public roads:</p> <ul style="list-style-type: none"> Public roads within or adjacent to AG-I zoned lands U.S. Highway 101 (US 101) within the South Coast/Gaviota Region where US 101 traverses the Project area within the CVC overlay Designated State Scenic Highway State Route (SR) 1, Santa Rosa Road, and SR 246 within the Lompoc Valley Region Designated State Scenic Highway SR 154 and public roads within the surrounding Inner Rural Areas within Santa Ynez Valley Hollister Avenue, adjacent to the San Marcos Agricultural Area <p>Potential future expansion of crop protection structures to Public Scenic Views and Scenic Resources as viewed from public roadways would be potentially significant.</p>	MM-VIS-1, MM-VIS-2, and MM-VIS-3, detailed above, would also apply to this issue.	With implementation of MM-VIS-1, MM-VIS-2, and MM-VIS-3, impacts would be partially mitigated. However, after mitigation impacts would remain significant and unavoidable.	Class I
<i>VIS-3: Light and Glare</i>	<p>Crop protection structures allowed under the proposed LUDC amendments would not be associated with any light source as the definition of these structures excludes lighting, and the ordinance amendment expressly prohibits lighting within exempt crop protection structures. Thus, the expansion of crop protection structures would not be associated with an increase in light.</p> <p>Hoop structures may cause a glare effect due to reflected light that creates the effect of bright light to the viewer, particularly when hoop structures are installed on land with sloping topography and depending on the angle of the sun's reflection. Sensitive viewers (motorists, cyclists, visitors, and recreationalists) that are facing hoop structures on an upward slope located within a near- or mid- view would be exposed to a potentially significant glare impact.</p>	MM-VIS-1, MM-VIS-2, and MM-VIS-3, detailed above, would also apply to this issue.	With implementation of MM-VIS-1, MM-VIS-2, and MM-VIS-3, impacts would be partially mitigated. However, after mitigation impacts would remain significant and unavoidable.	Class I
<i>Cumulative Impacts</i>	<p>Additional agricultural development, crop structures, and non-agricultural development within the Project area or surrounding areas could result in a cumulative impact related to visual character as these lands are intended for agricultural production and associated improvements related to agriculture.</p> <p>Expansion of crop protection structures and potential development of non-agricultural land uses on or in proximity to agriculturally zoned lands associated with cumulative projects could further exacerbate the potentially significant impacts to visual character and public scenic roads and could exacerbate glare impacts. Thus, cumulative impacts to visual resources would be potentially significant.</p>	MM-VIS-1, MM-VIS-2, and MM-VIS-3, detailed above, would also apply to this issue.	With implementation of MM-VIS-1, MM-VIS-2, and MM-VIS-3, cumulative impacts would be partially mitigated. However, after mitigation impacts would remain significant and unavoidable.	Class II Class I
Agricultural Resources				
<i>AG-1: Direct Conversion of Prime Agricultural Land</i>	<p>The installation of crop protection structures does not require the construction of buildings, foundations, or roadways; therefore, would not result in the permanent removal of agricultural land from production. The Project would clarify and streamline the permit process for crop protection structures and is intended to provide farmers flexibility with their operations and the ability to continue to use crop protection structures with minimal regulation. The Project would benefit agriculture by supporting streamlined permit requirements for crop protection structures, which in turn would support the preservation of farmland and productivity of agriculture, resulting in a beneficial impact to agricultural resources. Therefore, impacts would be beneficial.</p>	None required.	Impacts would be beneficial.	Class IV

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Issue	Impact	Mitigation Measures	Significance After Mitigation	Impact Classification
<i>AG-2: Land Use Compatibility/Agricultural Interface (Indirect Impacts)</i>	Areas where potential land use compatibility/agricultural interface impacts could occur include the interface between agricultural operations and EDRNs, Inner Rural Areas, Urban Agricultural Areas located in Eastern Goleta Valley, and areas where the Project is adjacent to Urban Areas and incorporated cities. While the Project is not associated with the introduction of a non-agricultural use, the Project could result in a change in farm practices that could generate complaints from existing adjacent non-agricultural land uses, primarily due to the visual change in the landscape. However, the County’s Right-to-Farm Ordinance protects existing agricultural operations, and hoop structure use is a commonly accepted agricultural practice in the County. Installation of crop protection structures would not create any nuisance issues such as dust, noise, odor or traffic, and could reduce agricultural interface issues associated with dust and pesticide drift by containing these effects within the structures. The Project would not introduce incompatible development adjacent to agriculture and would not promote nuisance producing agricultural practices. Therefore, impacts would be less than significant.	None required.	Impacts would be less than significant.	Class III
<i>Cumulative Impacts Analysis</i>	The Project would not contribute to cumulative direct or indirect impacts to agricultural resources, as the Project would be supportive of agricultural land uses and encourage preservation of agricultural soils and productive agricultural operations. Interface conflicts are not associated with the use of crop protection structures, as they would not generate nuisance effects such as noise, dust, odor, or traffic. Thus, although a cumulative impact to agricultural resources may occur from implementation of the cumulative projects that could also impair the viability of agricultural land, the Project’s contribution to a cumulative impact would be less than cumulatively considerable. Therefore, cumulative impacts of the Project would be less than significant.	None required.	Impacts would be less than significant.	Class III
Water Resources and Flooding				
<i>WR-1: Water Quality</i>	While the use of hoop structures can reduce pesticides use which can have a beneficial effect on water quality; the plastic covering can concentrate runoff within a field that can increase levels of silt and sediment in runoff and adversely affect water quality. However, agricultural operators are subject to the State Water Resources Control Board (SWRCB) Central Coast Region Order No. R3-2017-0002 (Ag Order 3.0), which includes a number of requirements to reduce storm water runoff and velocity and hold fine particles in place. Additionally, the County Grading Code provisions for agricultural grading requires an erosion control permit for agricultural-related grading on slopes with a natural gradient over 30 percent, such as to establish a new road, or create terracing with cut/fill depths of 3 feet or more. Existing regulations that are applicable to agricultural operations would ensure that storm water flows and sedimentation is reduced and runoff is managed on-site. Groundwater quality would not be significantly impacted by a potential increase in the use of crop protection structures as a result of the LUDC amendments because crop protection structures are not associated with generation of pollutants that could infiltrate into groundwater such as pesticides or nutrients. Therefore, impacts to water quality would be less than significant.	None required.	Impacts would be less than significant.	Class III

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Issue	Impact	Mitigation Measures	Significance After Mitigation	Impact Classification
<i>WR-2: Groundwater Supply</i>	The Project would not affect the existing low-density agricultural land use designations throughout the Project area and would not increase overall development potential. The Project would not directly result in any new groundwater wells, nor would it result in additional groundwater extraction. The only change in potential groundwater supply associated with the Project would be the potential for the Project to reduce the area available for groundwater infiltration within each basin through the introduction of hoop structures, which introduce an impervious plastic covering arranged in rows within a field. The Project would not result in any permanent impervious surfaces and even with hoop structures, precipitation would have the opportunity to infiltrate across a farm field between each hoop row. The area under hoop structures would still receive groundwater recharge, but through more concentrated points of infiltration relative to that of uncovered agricultural land. Additionally, the Conditional Waiver of Waste Discharge Requirements under the Central Coast RWQCB's Irrigated Lands Program would require storm water drainage to be retained on-site, which would further encourage groundwater infiltration. Therefore, impacts to groundwater supply would be less than significant.	None required.	Impacts would be less than significant.	Class III
<i>WR-3: Runoff and Drainage</i>	The impervious area associated with hoop structure plastics could concentrate precipitation flows, resulting in a greater velocity of runoff and affecting drainage patterns and could affect downstream flooding or result in secondary impacts to environmental resources such as biological communities. However, agricultural operators are subject to the Ag Order 3.0, which includes a number of requirements to reduce storm water runoff and velocity and hold fine particles in place. Additionally, the drainage characteristics would not be significantly altered in relation to an agricultural field, which also directs drainage between crop rows. In both cases, concentrated agricultural drainage must be managed in accordance with the Ag Order 3.0. Shade structures would have a reduced adverse effect related to runoff and drainage due to the perviousness of shade structure mesh, which would allow water to infiltrate more evenly across a field. Additionally, permits for crop protection structures over 20 feet in height would be required to obtain a Development Plan permit and would require landscape plans in compliance with Section 35.34.050, which would further reduce runoff and drainage impacts. Therefore, impacts would be less than significant	None required.	Impacts would be less than significant.	Class III
<i>WR-4: Flooding</i>	Based on the Floodplain Management Ordinance in the County Code, crop protection structures would be allowed within the floodplain portion of a Special Flood Hazard Areas (SFHA) without restriction. Thus, future development of crop protection structures within the floodplain would be less than significant. However, development within a floodway has additional restrictions as this is the location of stronger flood flows and the placement of structures within a floodway could impede flows and exacerbate flooding hazards. Floodwaters would have the potential to tear down the structures, washing them downstream during large storms, impeding floodwaters and further contributing to flooding. Based on existing County policy within the Comprehensive Plan and compliance with the County's Floodplain Management Ordinance, installation of crop protection structures within a FEMA designated floodway would be considered potentially significant.	MM-WR-1. Crop Protection Structures within a Floodway. Prior to approval of the Project, the Hoop Structures Ordinance Amendment shall be revised to clarify that crop protection structures located within a floodway would not qualify for the permit exemption. Crop protection structures proposed within a floodway shall be assessed on a case-by-case basis by a civil engineer as part of the Development Plan permit process. Crop protection structures within a floodway would be allowed provided a civil engineer provides a no-rise determination indicating that the structures as proposed would not result in a rise of floodwaters during a storm event.	Impacts would be reduced to less than significant with mitigation.	Class II

Table S-1. Summary of Environmental Impacts, Mitigation Measures, and Significance after Mitigation

Issue	Impact	Mitigation Measures	Significance After Mitigation	Impact Classification
<i>Cumulative Impact Analysis</i>	<p>The cumulative projects would result in an increased water demand within the Project area; however, the Project itself would not contribute to a potential cumulative impact to water supply in the region as crop protection structures do not require water use. Hoop structures can reduce crop water demand, resulting in a potential overall reduction in agricultural water use where they are used. Thus, the Project would not contribute to a cumulative water supply impact.</p> <p>Installation of crop protection structures has the potential to reduce pesticide use which would be a potential beneficial impact to water quality. Additionally, the use of crop protection structures would continue to enable the infiltration of groundwater between hoop structure eaves and shade structures allow infiltration through the shade material. Therefore, the Project would not contribute to a cumulative impact related to water quality, water supply, or inhibition of groundwater recharge.</p> <p>As all areas of the County are subject to stringent water quality requirements under SWRCB requirements, cumulative impacts related to increased runoff and siltation would be less than significant. The Project would not generate any other pollutants or contribute to any other potential water resources impact; therefore, cumulative impacts of the Project related to water resources would be less than significant.</p>	None required.	Impacts would be less than significant.	Class III
Resource Recovery and Solid Waste Management				
<i>RR-1 Solid Waste</i>	<p>Based on the estimated weight of agricultural plastic of 1,900 pounds or 0.95 tons per acre and assuming the 2015 acreage of crop protection structures, it is estimated that approximately 469496 tons per year of crop protection structure material would need to be disposed of annually. Based on the extent of crop protection structure use in 2015, the amount of material that would need to be disposed of would exceed the County's significance threshold of 196 tons of waste generation per year. Thus, with the potential expansion in use of crop protection structures associated with the Project, additional waste generation could result, which would be in excess of the County's significance thresholds. Therefore, future use and potential expansion of crop protection structures are anticipated to result in waste generation rates that exceed the County's significance threshold of 196 tons per year, resulting in a significant impact.</p>	No feasible mitigation measures have been identified.	Impacts would be significant and unavoidable.	Class I
<i>Cumulative Impacts</i>	<p>Since the Project would result in a significant impact related to solid waste by increasing to the existing waste stream directed to landfills potentially in excess of the County's significance threshold, the cumulative impact would be cumulatively considerable based on the County's threshold for cumulative solid waste impacts. Thus, the Project would contribute to a cumulatively considerable impact associated with resource recovery and solid waste</p>	No feasible mitigation measures have been identified.	Impacts would be significant and unavoidable.	Class I

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Issue	Impact	Mitigation Measures	Significance After Mitigation	Impact Classification
Biological Resources				
<i>BIO-1: Unique, Rare, Threatened, or Endangered Plant or Wildlife Species</i>	Potential impacts to special-status species associated with habitat modifications could indirectly occur as a result of the Project if a crop protection structure is installed on land that was not historically intensively cultivated, resulting in a potentially significant impact to unique, rare, threatened, or endangered plant or wildlife. Therefore, impacts related to unique, rare, threatened, or endangered plant or wildlife species would be potentially significant.	<p>MM-BIO-1. Limit Exemption to Crop Protection Structures on Historically Intensively Cultivated Agricultural Lands. Prior to approval of the Project, the Hoop Structures Ordinance Amendment shall be revised to clarify that hoop structures and shade structures (crop protection structures) shall be allowed with a permit exemption only on historically intensively cultivated agricultural lands. Historically intensively cultivated agricultural lands shall mean land that has been tilled for agricultural use and planted with a crop for at least three of the previous five years. The land does not necessarily need to have been actively planted with a crop for all five years (to account for potential fallow years).</p> <p>MM-BIO-2. Require a Minimum Gap of One Foot between Ground Surface and Hoop Structure Plastic. Prior to approval of the Project, the Hoop Structures Ordinance Amendment shall be revised to include a development standard that in order to qualify for an exemption, any crop protection structure located within 1.24 miles of a known or potential California tiger salamander breeding pond shall ensure that a minimum one-foot gap is maintained between the bottom edge of the plastic material and the ground surface to allow free movement of California tiger salamander.</p>	Impacts would be reduced to less than significant with mitigation.	Class II
<i>BIO-2: Sensitive Habitats or Sensitive Natural Communities</i>	If crop protection structures are installed on land that has not been subject to historic intensive agricultural production (e.g. tilling), their use could indirectly affect sensitive habitats or sensitive natural communities due to the indirect effect of adoption of the exemption for crop protection structures that could encourage expansion of agriculture. Thus, potential impacts to sensitive habitats or sensitive natural communities as a result of installation of crop protection structures on land that has not been in historic intensive cultivation would be potentially significant. Impacts related to sensitive habitats or sensitive natural communities would be potentially significant.	MM-BIO-1, detailed above, would also apply to this issue.	Impacts would be reduced to less than significant with mitigation.	Class II
<i>BIO-3: Movement or Patterns of Any Native Resident or Migratory Species</i>	Potential impacts associated with the movement or patterns of native resident or migratory species is addressed under Impact BIO-1 in Section 4.6.4 of this EIR. As discussed in that section, where crop protection structures are installed on land that has not been in historic intensive agricultural production, impacts would be potentially significant.	MM-BIO-1 and MM-BIO-2, detailed above, would also apply to this issue.	Impacts would be reduced to less than significant with mitigation.	Class II

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Issue	Impact	Mitigation Measures	Significance After Mitigation	Impact Classification
<i>BIO-4: Conflicts with Adopted Local Plans, Policies, or Ordinances Oriented Towards the Protection and Conservation of Biological Resources</i>	The Project does not include development standards to regulate crop protection structures near Environmentally Sensitive Habitat, streams, or rivers that would provide consistency with applicable policies intended to protect these resources; therefore, impacts related to conflicts with adopted local plans, policies, or ordinances oriented towards the protection and conservation of biological resources would be potentially significant.	MM-BIO-1, detailed above, would also apply to this issue. BIO-3. Setbacks from Streams and Creeks. Prior to approval of the Project, the Hoop Structures Ordinance Amendment shall be revised to require that crop protection structures shall be located a minimum of 50 feet from streams and creeks in Urban Areas and Inner Rural Areas and EDRNs and 100 feet from streams and creeks in Rural Areas.	Impacts would be reduced to less than significant with mitigation.	Class II
<i>Cumulative Impact Analysis</i>	A potential cumulative impact associated with the cumulative projects could occur due to cumulative development and grading near water bodies and Environmentally Sensitive Habitat Areas which has the potential to result in vegetation clearing or soil erosion and sediment pollution into downstream waterbodies. The effects of increased cultivation or land disturbance associated with the Cannabis Ordinance, combined with agricultural development under the County proposed Agricultural Tiered Permitting, may generate a cumulative biological resource impact within the Inland Areas of the County zoned for agriculture. These impacts would combine with the potential impacts of the Project where the proposed ordinance amendments could indirectly encourage conversion of grazing lands or sensitive habitats to intensive agriculture, resulting in a potentially significant cumulative impact to biological resources.	MM-BIO-1, MM-BIO-2, and MM-BIO-3, detailed above, would also apply to this issue.	Impacts would be reduced to less than significant with mitigation.	Class II