

6.0 Alternatives

The California Environmental Quality Act (CEQA) Guidelines Section 15126.6 requires that an environmental impact report (EIR) compare the effects of a “range of reasonable alternatives” to the effects of a project. The alternatives selected for comparison should be those that would attain most of the basic project objectives and avoid or substantially lessen one or more significant effects of the project. As discussed in Chapter 4, the proposed Hoop Structures Ordinance Amendment (Project) would result in potentially significant direct, and/or cumulative environmental impacts related to aesthetics/visual resources, water resources and flooding, resource recovery and solid waste management, and biological resources. In developing the alternatives to be addressed in this chapter, consideration was given to the ability to avoid or substantially reduce significant environmental impacts and to further reduce less than significant impacts (identified in Chapter 4 of this EIR).

The “range of reasonable alternatives to the project” is governed by the “rule of reason,” which requires that the EIR set forth only those alternatives necessary to permit an informed and reasoned choice by the lead agency and to foster meaningful public participation (CEQA Guidelines Section 15126.6(f)). The lead agency for this project is the County of Santa Barbara (County). The County Board of Supervisors and Planning Commission will consider these alternatives and determine whether to adopt the Project as proposed, or one of the alternatives.

The proposed Project alternatives addressed in this EIR were selected in consideration of one or more of the following factors:

- The extent to which the alternative would feasibly accomplish most or all of the basic Project objectives;
- The extent to which the alternative would avoid or substantially lessen any of the identified significant environmental effects of the proposed Project;
- The feasibility of the alternative, taking into account site suitability, economic viability, availability of infrastructure, Comprehensive Plan consistency, and consistency with other applicable plans and regulatory limitations;
- The appropriateness of the alternative in contributing to a “reasonable range” of alternatives necessary to permit a reasoned choice; and
- The requirement of the CEQA Guidelines to consider a “no project” alternative, and to identify an “environmentally superior” alternative in addition to the no project alternative (Section 15126.6[e]).

CEQA Guidelines Section 15126.6 generally defines “feasible” to mean an alternative that is capable of being accomplished in a successful manner within a reasonable period of time, while also taking into account economic, environmental, social, technological, and legal factors. According to the CEQA Guidelines, any alternative considered would also need to

be consistent with the project objectives, which are described in Chapter 2, Project Description, supporting the proposed Project's consistency with Comprehensive Plan goals protecting important resources and promoting sustainable recreational and agricultural land use within the Project area.

The following specific objectives support the underlying purpose of the project, assist the County as lead agency in developing a reasonable range of alternatives to evaluate in this EIR, and will ultimately aid the lead agency in preparing findings and overriding considerations, if necessary. The proposed Project's objectives are:

- 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.

Recent court cases have upheld a lead agency's reliance on project objectives both to narrow the scope of alternatives analyzed in an EIR and, ultimately, to reject those alternatives as infeasible if there is substantial evidence that an alternative will inhibit the agency's ability to achieve most of the basic objectives of the project (*Jones vs. Regents of the University of California* [2010 183 Cal.App.4th 818]).

As required under CEQA Guidelines Section 15126.6(e)(2), the EIR must identify the environmentally superior alternative. Pursuant to the CEQA Guidelines, if the no project alternative is determined to be the environmentally superior alternative, then another alternative among the alternatives evaluated must be identified as the environmentally superior alternative.

The environmentally superior alternative determination analysis is in Section 6.2 below.

6.1 Project Alternatives

During the preparation of this EIR, the County considered several alternatives for the Project. The goal for developing possible alternative scenarios under CEQA is to identify other means to attain the Project objectives while lessening or avoiding potentially significant environmental impacts caused by adopting the Project. A reasonable range of alternatives with the potential to attain the basic objectives of the Project but avoid or

substantially lessen significant impacts is analyzed below. Each alternative is discussed in relation to the objectives of the Project. Alternatives selected for this analysis include:

- No Project Alternative
- Alternative 1: Furtherance of Policy Consistency
- Alternative 2: Visual Character and Scenic Views Protection

A summary of the impacts of the alternatives in comparison to the proposed Project is provided in Table 6-1.

Table 6-1: Alternatives Comparison

Issue	Project	No Project Alternative	Alternative 1: Policy Consistency	Alternative 2: Visual Character & Scenic Views Protection
Land Use and Development				
LU-1: Conflicts with Land Use Plans/Regulation	LTS (Class III)	> LTS (Class III)	< LTS (Class III)	=
LU-2: Land Use Compatibility	LTS (Class III)	> LTS (Class III)	=	=
Cumulative Impacts	Same for each issue	>	=	=
Aesthetics/Visual Resources				
VIS-1 Visual Character	SU (Class I)	> SU (Class I)	< SU (Class I)	< SU (Class I)
VIS-2: Public Scenic Views and Scenic Resources	SU (Class I)	> SU (Class I)	< SU (Class I)	< SU (Class I)
VIS-3: Light and Glare	SU (Class I)	> SU (Class I)	=	=
Cumulative Impacts	Same for each issue	>	<	<
Agricultural Resources				
AG-1: Direct Conversion of Prime Agricultural Land	B (Class IV)	> LTS (Class III)	=	> B (Class IV)
AG-2: Land Use Compatibility/Ag Interface	LTS (Class III)	=	=	=
Cumulative Impacts	LTS (Class III)	=	=	> LTS (Class III)
Water Resources and Flooding				
WR-1: Water Quality	LTS (Class III)	=	=	=
WR-2: Groundwater Supply	LTS (Class III)	=	=	=
WR-3: Runoff and Drainage	LTS (Class III)	=	=	=
WR-4: Flooding	SM (Class II)	>SU (Class I)	=	=
Cumulative Impacts	Same for each issue	>	=	=
Resource Recovery and Solid Waste				
RR-1 Resource Recovery and Solid Waste	SU (Class I)	=	=	=
Cumulative Impacts	SU (Class I)	=	=	=
Biological Resources				
BIO-1: Unique, Rare Plant or Wildlife Species	SM (Class II)	>SU (Class I)	< SM (Class II)	=
BIO-2: Sensitive Habitats/Sensitive Communities	SM (Class II)	>SU (Class I)	< SM(Class II)	=
BIO-3: Movement of Native or Migratory Species	SM (Class II)	>SU (Class I)	< SM (Class II)	=
BIO-4: Conflicts with Adopted Plans, Policies, or Ordinances Protecting Biological Resources	SM (Class II)	>SU (Class I)	< SM (Class II)	=
Cumulative Impacts	SM (Class II)	>SU (Class I)	< SM (Class II)	=
NOTES: LTS = Less Than Significant; SM = Significant, Mitigated; SU = Significant, Unavoidable; B = Beneficial < Impacts of the alternative are less than the Project > Impacts of the alternative are greater than the Project (for Class IV impacts, this means the impact is less beneficial, thus greater) = Impacts of the alternative are the same as the Project				

6.1.1 No Project Alternative

a. Description

Under the No Project Alternative, the County would not amend the County Land Use and Development Code (LUDC) to change the current regulatory mechanisms which govern the development of hoop structures and shade structures on land zoned Agricultural I (AG-I) and Agricultural II (AG-II) in the unincorporated inland areas. Hoop structures and shade structures would continue to be permitted in the same manner as greenhouses in areas regulated by the LUDC, requiring a Land Use Permit for hoop structures less than 20,000 square feet in area, and a Development Plan for hoop structures that are 20,000 square feet or more, in area, which also requires environmental review and a hearing before the Planning Commission (LUDC Section 35.42.140).

No changes would be made to establish a permit exemption for hoop structures and shade structures of a given height in the AG-I and AG-II zones. Nor would criteria and development standards be established to qualify for the permit exemption.

b. No Project Alternative Impact Analysis

LAND USE AND DEVELOPMENT

Impacts of the Project related to land use and development were found to be less than significant (Class III). Under the No Project Alternative, a planning permit exemption for hoop structures and shade structures not more than 20 feet in height would not occur. Hoop structures and shade structures, regardless of height, would continue to be permitted as greenhouses in areas regulated by the LUDC, requiring either a Development Plan (for 20,000 square feet or more) or a Land Use Permit (for less than 20,000 square feet).

While the LUDC requires planning permits for hoop and shade structures on AG-II and AG-I zoned land, the majority of existing hoop structures and shade structures have been installed without permits. Factors contributing to this situation include the lack of clarity within the LUDC regarding permit requirements, as well as, the lack of awareness by many agriculturists that planning permits are required for hoop structures and shade structures. Zoning code enforcement in Santa Barbara County is “complaint driven” and is reactive rather than active enforcement. Zoning complaints regarding hoop structures and shade structures are investigated and, if warranted, a zoning enforcement case is opened to ensure compliance with LUDC requirements and standards.

Under the No Project Alternative, zoning code enforcement would ensure zoning compliance for a limited number of new hoops structures and shade structures; however, similar to existing conditions, it is likely that a large number of new hoop structures and shade structures would be installed without permits. Impacts related to conflicts with applicable land use plan, policy, or regulations (LU-1), and land use compatibility (LU-2) would be slightly greater under the No Project Alternative since the Project amendments to revise the permit path for hoop structures and shade structures from one of greater complexity

and uncertainty to one that is clear and less complex would not be achieved under the No Project Alternative.

AESTHETICS/VISUAL RESOURCES

The Project identified significant and unavoidable impacts to visual character (VIS-1), public scenic views and scenic resources (VIS-2), and light and glare issues (VIS-3). Impacts of the No Project Alternative on aesthetic/visual resources (VIS-1, VIS-2, and VIS-3) also would be significant (Class I) and increased compared to the Project. Under the No Project Alternative, zoning code enforcement would ensure zoning compliance for a limited number of new hoops structures and shade structures; however, similar to existing conditions, it is likely that a large number of new hoop structures and shade structures would be installed without permits and would not benefit from permit review and application of setbacks and standards to address potential project-related impacts. Thus, impacts of the No Project Alternative would be greater than the Project in relation to Aesthetics/Visual Resources.

AGRICULTURAL RESOURCES

The Project identified beneficial impacts to agriculture (AG-1) and less than significant impacts related to agricultural interface issues (AG-2). Under the No Project Alternative, current permit requirements for hoop structures and shade structures would remain in place, and farmers would continue to install and use these structures to grow high-value crops. The No Project Alternative would not provide the benefits of permit streamlining that would be provided by the Project. However, the No Project Alternative would not result in the direct conversion of agricultural lands to non-agricultural uses, a less than significant impact (AG-1) to agricultural resources (Class III).

Under the No Project Alternative, indirect impacts associated with land use compatibility/agricultural interface associated with non-agricultural land use developments near agricultural uses would be less than significant (Class III). These impacts typically result when incompatible uses such as residential subdivisions are located adjacent to agricultural lands, potentially raising nuisance issues. Under the No Project Alternative, farmers would continue to install and use these structures that are important tools for farmers to use to grow high-value crops, and, as discussed in detail in Section 4.3.4.b, the No Project Alternative would not introduce incompatible development adjacent to agriculture and would not promote nuisance producing agricultural practices.

WATER RESOURCES AND FLOODING

Impacts of the Project related to water quality (WR-1), groundwater supply (WR-2), and runoff and drainage (WR-3) were found to be less than significant (Class III) and would be similar under the No Project Alternative. Impacts of the Project related to flooding (WR-4) were found to be less than significant with mitigation (Class II). Under the No Project Alternative, zoning code enforcement would ensure zoning compliance for a limited number of new hoops structures and shade structures; however, similar to existing conditions, it is

likely that a large number of new hoop structures and shade structures would be installed without permits and would not benefit from permit review and application of standards to address potential Project-related impacts. Impacts of the No Project Alternative on flooding (WR-4) would be significant since crop protection structures could be placed within the floodway which could impede and exacerbate flood flows.

RESOURCE RECOVERY AND SOLID WASTE MANAGEMENT

Impacts of the No Project Alternative on resource recovery and solid waste (RR-1), including associated cumulative impacts would be the same as the Project (Class I). The major barrier to agricultural plastics recycling under the Project and No Project Alternative is the lack of a consistent recycling market for the plastics. Farmers are already incentivized to recycle plastic when there is a market available because they stand to earn money from their plastic waste versus spending money to have it hauled and deposited in a landfill. Thus, impacts of this Alternative would be the same as the Project.

BIOLOGICAL RESOURCES

Impacts of the Project related to biological resources were found to be less than significant with mitigation (Class II). Impacts of the No Project Alternative would be significant and more severe than the Project for the following issues: unique, rare plant or wildlife species (BIO-1), sensitive habitats/communities (BIO-2), movement of native or migratory species (BIO-3), and conflicts with adopted plans, policies, or ordinances protecting biological resources (BIO-4). Under the No Project Alternative, zoning code enforcement would ensure zoning compliance for a limited number of new hoops structures and shade structures; however, similar to existing conditions, it is likely that a large number of new hoop structures and shade structures would be installed without permits and would not benefit from permit review and application of setbacks and standards to address potential project-related impacts.

6.1.2 Alternative 1: Furtherance of Policy Consistency

a. Description

Alternative 1 would further certain policy objectives of the Comprehensive Plan, including community plans, that protect biological resources and visual resources. This alternative would also further policies that support agriculture by streamlining the permit requirement for certain non-exempt crop protection structures to a Zoning Clearance (versus a Development Plan under the Project).

Specifically, this alternative includes two components: (1) additional development standards that would apply to crop protection structures in order to qualify for an exemption, and (2) the addition of a Zoning Clearance permit path for crop protection structures no more than 20 feet in height that would be located on agriculturally zoned lands not historically cultivated with agriculture. The details of these two components are discussed further below.

The first component of Alternative 1 would be to apply the exemption for crop protection structures in the same manner as the proposed Project, including all mitigation measures identified in the EIR. The following development standards that would further policy consistency and further reduce potentially significant impacts to visual resources and biological resources would be required in order for crop protection structures to qualify for an exemption.

- Crop protection structures shall be located no less than 100 feet from the following environmentally sensitive habitat areas.
 - Native plant communities recognized as rare by California Department of Fish and Wildlife (2003 or as amended). Examples include native grasslands, maritime chaparral, Bishop pine forests, and coastal dune scrub.
 - Native woodlands and forests.
 - Plant communities known to contain rare, endangered, or threatened species.
 - Streams, riparian areas, vernal pools, and wetlands.
 - Any designated Environmentally Sensitive Habitat Areas.
- In addition to the standard structural setback in each zone, crop protection structures 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.
- Crop protection structures shall not exceed a height limit of 12 feet within the Critical Viewshed Corridor Overlay.

The second component of Alternative 1 would be to add a Zoning Clearance permit path for crop protection structures not more than 20 feet in height that are located on agriculturally zoned lands not historically cultivated with agriculture (i.e., on lands that have not been actively cultivated for at least three of the previous five years, such as grazing lands and native habitats). To qualify for the Zoning Clearance permit, the crop protection structures must comply with the mitigation measures of this EIR, the additional development standards under the first component of Alternative 1, and the following:

- For crop protection structures that are located on lands not historically cultivated with agriculture (i.e., on lands that have not been actively cultivated for at least three of the previous five years, such as grazing lands and native habitats), the applicant shall consult with the appropriate agency (United States 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.
 - Rare, endangered, or threatened species are defined as those listed by state or federal wildlife agencies under the state or federal endangered species acts, candidates for listing, species of special concern, and species that meet the definition of “rare” in Section 15380 of CEQA.

- A separation of greater than 100 feet may be required in order to fully protect formally listed endangered species (e.g., a 100-foot separation may not fully protect known breeding ponds for California tiger salamander).

b. Furtherance of Policy Consistency Alternative Impact Analysis

LAND USE AND DEVELOPMENT

Impacts of the Project related to land use and development were found to be less than significant (Class III). Alternative 1 would achieve further consistency with the County Comprehensive Plan policies and regulations by applying additional development standards. Alternative 1 would better implement a number of Comprehensive Plan policies by adding additional development standards to protect environmentally sensitive habitat areas, and by limiting the height of structures adjacent to a public road or designated State Scenic Highway or within the Critical Viewshed Corridor Overlay to further protect visual resources and comply with related County policies.

Additionally, Alternative 1 would incorporate a Zoning Clearance permit path to allow a more streamlined approach to installing crop protection structures on lands that have not been historically cultivated compared to the Development Plan permit process that would otherwise be required by the Project, as mitigated. These requirements would provide additional consistency with Comprehensive Plan policies that are intended to protect biological resources and avoid impacts to sensitive species and habitats, while providing a more streamlined process than the Development Plan consistent with policies encouraging the intensification of agriculture, where appropriate. Under both the Project and Alternative 1 scenarios, impacts related to land use would be less than significant (Class III); however, under Alternative 1, residual impacts associated with Impact LU-1 would be slightly reduced compared to the Project due to additional development standards that would further policy consistency.

Impacts related to Land Use Compatibility (Impact LU-2) and cumulative impacts would be the same under Alternative 1 as with the Project because the proposed Alternative 1 ordinance standards would not affect these issue areas.

AESTHETICS/VISUAL RESOURCES

Alternative 1 would result in reduced impacts related to aesthetics/visual resources compared to the Project, thereby furthering consistency with Comprehensive Plan policies intended to protect visual resources. Specifically, additional development standards associated with Alternative 1 would further reduce the significant (Class I) impact associated with visual character (VIS-1) and public scenic views and scenic resources (VIS-2). Alternative 1 would impose an additional height restriction of 12 feet in order to qualify for the exemption for crop protection structures within 200 feet of the edge of the right-of-way of a public road or adjacent to a designated State Scenic Highway. Additionally, the 12-foot height limit would also be imposed within the Critical Viewshed

Corridor Overlay. These additional measures would further reduce the significant impacts related to Impacts VIS-1 and VIS-2 by reducing the overall height of crop protection structures allowed with an exemption which would lessen the potential visual impact the structures would have on views and visual character. The reduced height limit, however, would not affect the potential to create glare; thus, potential impacts related to glare would be significant and unavoidable under this Alternative, the same as the Project.

AGRICULTURAL RESOURCES

The Project would result in beneficial impacts to agriculture (Impact AG-1) and less than significant impacts related to agricultural interface issues (Impact (AG-2). Agricultural interface impacts under Alternative 1 would be the same as the Project. In one aspect, the beneficial impacts to agriculture associated with Alternative 1 would be slightly reduced compared to the Project due to the increased regulation of crop protection structures that would be applied. These additional restrictions on agricultural lands would slightly reduce flexibility for farmers to choose their farming practices without limitations. Additionally, development standards associated with Alternative 1 could limit agricultural expansion in areas with sensitive resources, which could affect the long-term viability of individual farms. In another aspect, Alternative 1 would benefit agriculture, as compared to the Project, by incorporating a streamlined permit path (Zoning Clearance permit) for installing crop protection structures on lands that have not been historically cultivated. This would provide an additional benefit to farmers when compared to the Development Plan permit process as required under the Project, because the Development Plan permit process is more costly and time consuming. Overall, beneficial impacts related to conversion of agricultural land (Impact AG-1) under Alternative 1 would be similar to the Project (Class IV). Impacts of Alternative 1 related to land use compatibility/agricultural interface (Impact AG-2) would be the same as the Project (less than significant; Class III) as the additional development regulations would not affect interfaces between agriculture and residential uses. Cumulative impacts of Alternative 1 would be less than significant, the same as the Project.

WATER RESOURCES AND FLOODING

Impacts of the Project related to water quality, groundwater supply, and runoff and drainage were found to be less than significant (Class III) and impacts related to flooding were found to be less than significant with mitigation (Class II). Impacts of Alternative 1 would be the same as the Project for all issue areas. While Alternative 1 would require additional setbacks from environmentally sensitive habitat areas and roadways, these development standards would not affect any water resource issue area. Overall, impacts of Alternative 1 would be the same as the Project.

RESOURCE RECOVERY AND SOLID WASTE MANAGEMENT

Impacts of Alternative 1 on resource recovery and solid waste (RR-1), including associated cumulative impacts would be the same as the Project. The proposed development standards

associated with Alternative 1 would not have a significant effect on the ultimate use and disposal rates for crop protection structures; thus, impacts of this alternative would be the same as the Project.

BIOLOGICAL RESOURCES

Alternative 1 would result in overall greater protections to biological resources than the Project. This alternative would require a minimum buffer of 100 feet from environmentally sensitive habitat areas including native plant communities; native woodlands and forests; plant communities known to contain rare, endangered, or threatened species; streams, riparian areas, vernal pools, and wetlands; and any designated Environmentally Sensitive Habitat Areas, furthering consistency with associated Comprehensive Plan policies addressing these resource areas. Alternative 1 would implement all of the Project mitigation measures in addition to these additional development standards that would provide additional protections for biological resources compared to the Project, while still allowing the exemption.

Alternative 1 would also provide a streamlined permit path (Zoning Clearance permit) for installing crop protection structures on lands that have not been historically cultivated, which would provide an additional benefit to farmers when compared to the Development Plan permit process that would be required under the Project. The Development Plan permit process is more costly and time consuming. In addition, the Zoning Clearance would require an applicant to consult with the appropriate agency to comply with any regulations as necessary to protect rare, endangered, or threatened species. This requirement under the Zoning Clearance would ensure protection of biological resources on lands that have not been historically cultivated. Thus, all of the residual impacts associated with each biological resource issue area would be reduced compared to the Project.

6.1.3 Alternative 2: Visual Character and Scenic Views Protection

a. Description

Alternative 2 would implement the same mitigation measures as the Project and would revise the ordinance amendment for the AG-I zone to limit the permit exemption to crop protection structures 12 feet or less in height (instead of 20 feet or less) throughout the AG-I zone. Alternative 2 also would revise the ordinance amendment to limit the permit exemption for hoop structures and shade structures to 12 feet or less in height on all lots located adjacent to designated State Scenic Highways (instead of only within 75 feet from designated State Scenic Highways).

b. Visual Character and Scenic Views Protection Alternative Impact Analysis

LAND USE AND DEVELOPMENT

Impacts of the Project related to land use and development were found to be less than significant (Class III). Alternative 2 would have similar impacts as the Project related to conflicts with applicable land use plans and regulations (LU-1) and land use compatibility

(LU-2) Reducing the height of crop protection structures allowed with an exemption to 12 feet within the AG-I zone would not measurably change the level of policy consistency achieved by this alternative because while it would possibly further certain Comprehensive Plan policies relative to the protection of scenic resources, Alternative 2 would also further restrict agricultural land uses within an agricultural zone where the intent is to support agriculture and encourage maximum agricultural productivity. Overall, the potential impacts related to conflicts with land use plans/regulations, neighborhood compatibility, and associated cumulative impacts for this alternative would be less than significant and the same as the Project. Overall, residual impacts of Alternative 2 related to land use and development would be the same as the Project.

AESTHETICS/VISUAL RESOURCES

Alternative 2 would further reduce potential visual impacts compared to the Project by reducing the height of crop protection structures that would qualify for the exemption. Alternative 2 would reduce the height for the crop protection structure exemption from 20 feet to 12 feet within all AG-I zoned lands and on all lots located adjacent to designated State Scenic Highways. This would be a more extensive limitation than is proposed within the Project mitigation measure MM-VIS-1, which would reduce the height for the crop protection structure exemption from 20 feet to 12 feet only within 75 feet of the edge of the right-of-way of a public road or any designated State Scenic Highway. As Alternative 2 would affect lands zoned AG-I and designated State Scenic Highways, it would primarily address visual resources in and around Urban Areas, Inner Rural Areas (especially the Santa Ynez Valley), some Existing Developed Rural Neighborhoods (EDRNs), and State Route (SR) 154, SR 1 between U.S. Highway 101 (US 101) and Lompoc, and US 101 along the Gaviota Coast.

Alternative 2 would reduce the potential visual character impact (VIS-1) compared to the Project by reducing the height that would qualify for an exemption within AG-I areas to 12 feet, versus 20 feet under the Project. This reduced height limit would increase visual compatibility within Urban Areas, EDRNs, and Inner Rural Areas, compared to 20-foot-tall structures.

Alternative 2 would reduce potential public views and scenic resources impacts (VIS-2) compared to the Project because the potential adverse impacts to views from public scenic roadways would be reduced due to the more extensive 12-foot height limit that would apply to lots adjacent to designated State Scenic Highways (instead of only the first 75 feet adjacent to the Scenic Highway). Additionally, the 12-foot height limit throughout the AG-I zone would further reduce potential public views and scenic resources impacts as seen from all public roadways and viewing areas within the AG-I zones.

Potential adverse impacts related to light and glare (VIS-3) would be the same as the Project because crop protection structures would be allowed at a similar distance from roadways as the Project, and the reduced height would not substantially change the

potential glare impact. Although impacts to VIS-1 and VIS-2 would be reduced under Alternative 2, these impacts would remain significant and unavoidable. Similarly, Alternative 2 would reduce cumulative impacts related to issues VIS-1 and VIS-2 compared to the Project and cumulative impacts associated with issue VIS-3 would be the same as the Project.

AGRICULTURAL RESOURCES

Alternative 2 would somewhat reduce the beneficial impacts to agriculture (Impact AG-1), compared to the Project, by reducing the exemption height limit from 20 feet to 12 feet on AG-I zoned lands and lots adjacent to designated State Scenic Highways. This lower height to qualify for the exemption would somewhat reduce flexibility for farmers to install crop protection structures up to 20 feet tall on AG-I zoned lands and on lots adjacent to State Scenic Highways. Although somewhat less than the Project, Alternative 2 would continue to be beneficial to agriculture because it would continue to allow crop protection structures with a permit exemption, just at a lower height. Alternative 2 would not introduce incompatible development adjacent to agriculture; therefore, impacts related to land use compatibility/agriculture interface conflicts would be less than significant, similar to the Project.

WATER RESOURCES AND FLOODING

Impacts of Alternative 2 related to water resources and flooding would be the same as the Project. Alternative 2 lowers the height limit to qualify for the permit exemption within AG-I zoned lands and on lots adjacent to designated State Scenic Highways, and therefore, would not further affect water quality, groundwater supply, runoff and drainage, or flooding. Impacts of Alternative 2 would be the same as the Project.

RESOURCE RECOVERY AND SOLID WASTE MANAGEMENT

Impacts of Alternative 2 related to resource recovery and solid waste management would be the same as the Project. Alternative 2 lowers the height limit to qualify for the permit exemption within AG-I zoned lands and on lots adjacent to designated State Scenic Highways and, therefore, would not measurably affect the likely volume of waste generated or the availability of recycling. Impacts of Alternative 2 would be the same as the Project.

BIOLOGICAL RESOURCES

Impacts of Alternative 2 related to biological resources would be the same as the Project. Alternative 2 lowers the height limit to qualify for the permit exemption within AG-I zoned lands and on lots adjacent to designated State Scenic Highways and, therefore, would not further affect the potential impacts of the Project on biological resources. Impacts of Alternative 2 would be the same as the Project.

6.2 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) requires that an EIR identify which alternative is the environmentally superior alternative. If the no project alternative is the environmentally superior alternative, the EIR must also identify which of the other alternatives is the environmentally superior alternative. In the case of the proposed Project, Alternative 1 is the environmentally superior alternative because it would further reduce less than significant residual impacts related to land use and development (LU-1 Conflicts with Land Use Plans/Regulations), would further reduce the significant, unavoidable impacts related to all of the aesthetics/visual resources (VIS-1, VIS-2 and VIS-3), and would further reduce the significant and mitigated impacts related to all of the biological resources (BIO-1, BIO-2, BIO-3) issue areas. The remaining impacts of this alternative would be the same as the Project.