

## **7.0 Other CEQA Mandated Sections**

This chapter addresses other issues for which California Environmental Quality Act (CEQA) Guidelines Section 15126 requires analysis beyond the environmental topical areas discussed in Chapter 4. In this chapter, the additional possible impacts of the Hoop Structures Ordinance Amendment (Project) are analyzed, including growth inducement, economic growth, population growth, significant environmental effects that cannot be avoided, and significant irreversible environmental changes.

In addition, pursuant to CEQA Guidelines Section 15128, this chapter includes a discussion of possible significant effects of the Project that were determined not to be significant, and therefore, were not discussed in detail in the Environmental Impact Report (EIR).

### **7.1 Growth-inducing Effects**

Pursuant to the 2014 CEQA Guidelines, an EIR shall “discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment...it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.”

As previously discussed in Chapter 3, the Project area consists of approximately 927,014 acres within Agricultural I (AG-I) and Agricultural II (AG-II) zoned areas in the unincorporated, Inland Areas of the County of Santa Barbara (County) outside of Montecito (see Figure 2-1). The Project’s objective is to clarify, simplify, and streamline the permit process for crop protection structures. This is intended to allow farmers more flexibility in their agricultural operations in support of the County’s agricultural economy. The Project is intended to benefit the agricultural economy within the County, as crop protection structures are used by farmers as a tool to improve growing conditions for certain crops. In general, the structures allow farmers to generate higher cultivation yields, extend the growing season for certain crops, and allow farmers to target important harvest windows to maximize profits. These structures are an important tool that allows farmers to remain competitive in a global market. Therefore, the Project is expected to support and maintain the economic position that agriculture has within the County and support improvement and growth of the economic condition for agricultural operations within the County.

Regarding population growth, the Project does not propose any land use designation change that would increase the overall housing stock, nor would the Project remove any barriers to growth. Therefore, the Project is not anticipated to foster population growth or result in additional housing, either directly or indirectly, within the County.

Overall, the Project is not growth inducing, because it involves a Land Use and Development Code (LUDC) amendment that provides clarification for and the streamlining

of the permitting process for crop protection structures within the County, and is intended to be beneficial for agricultural production.

## **7.2 Significant Environmental Effects that Cannot be Avoided if the Project is Implemented**

In accordance with CEQA Guidelines Section 15126.2(b), any significant unavoidable impacts of a project, including those impacts that can be mitigated, but not reduced to below a level of significance despite the willingness to implement all feasible mitigation measures, must be identified in the EIR. These are referred to as Class I impacts within the County. Implementation of the Project would result in significant, unavoidable impacts on the following resources: aesthetics/visual resources (visual character changes, public scenic views and scenic resources, and light and glare) and resource recovery and solid waste.

Impacts to these resources would remain significant and unavoidable under the Project (refer to Chapter 4 of this EIR for further detail). There are no other significant impacts identified in Chapter 4, Environmental Impact Analysis, of this EIR.

## **7.3 Significant Irreversible Environmental Changes that Would be Caused by the Proposed Project Should It be Implemented**

Section 15126.2(c) of the CEQA Guidelines requires an evaluation of significant irreversible environmental changes that would occur following Project implementation. Examples of possible irreversible changes include:

- Primary impacts such as the use of non-renewable resources during the initial and continued phases of the Project;
- Secondary impacts such as highway improvements that provide access to previously inaccessible areas; and
- Environmental accidents potentially associated with the Project.

Section 15126.2(c) of the CEQA Guidelines states that irretrievable commitments of resources should be evaluated to assure that current consumption of such resources is justified.

### **7.3.1 Non-renewable Resources**

The Project involves an amendment to the LUDC to allow for the streamlining of the permitting process for hoop structures and shade structures to allow farmers more flexibility and efficient agricultural operations in support of the County's agricultural economy. As such, the Project would not directly involve the use of non-renewable resources, due to the administrative nature of the Project.

However, Project implementation would result in the ongoing and potentially increased use of crop protection structures throughout the County, which could result in an increase in manufacturing/production of the structures, as well as the transport of the crop protection structures to agricultural operations within the County. The manufacturing process for crop protection structures would entail the commitment of non-renewable energy resources (fossil fuels, natural gas, and electricity), human resources, and aggregate material resources such as metals (e.g., steel, copper, and lead) and petrochemical construction materials (e.g., plastics), and possibly water resources, most of which are non-renewable or locally limited resources. In addition to the manufacturing process, the transportation and installation of crop protection structures to and within agricultural operations would require the use of fossil fuels, such as gasoline, electricity, and oil, which are used by delivery and transport vehicles and equipment. Installation of the crop protection structures require use of equipment and human resources to install. Small utility tools may be required for installation as well, which are likely to require some form of electricity. Installation of the hoop and/or shade structures would occur approximately once per every two or three years based on the current usage pattern.

The operational use of crop protection structures that would qualify for an exemption would not be associated with any electrical wiring, plumbing, or mechanical components, or permanent footings or foundations as these elements would not be allowed under the LUDC exemption for crop protection structures 20 feet tall or less. As such, the operational use of crop protection structures would not require the use of non-renewable resources. In addition, any non-renewable resource use that would support agricultural operations, such as crop irrigation or crop harvesting equipment, would be utilized regardless of whether crop protection structures are installed.

The Public Resource Code Section 21100(b)(3) and CEQA Guidelines Section 15126.4 require EIRs to analyze energy use and conservation and, if necessary, associated mitigation as it is applicable to the Project, and in particular to describe any wasteful, inefficient, and unnecessary consumption of non-renewable energy caused by a project. Thus, this analysis focuses not on total energy consumed but more on the efficiency of the electricity, natural gas, and fuel (diesel and gasoline) consumption.

CEQA Guidelines, Appendix F, Energy Conservation, also provides guidance for EIRs regarding potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing the inefficient, wasteful, and unnecessary consumption of energy. The California State Resources Agency amended Appendix F to make it clear that an energy analysis is mandatory. However, the California State Resources Agency also clarified that the energy analysis is limited to effects that are applicable to the Project (Final Statement of Reasons for Regulatory Action 2009). Appendix F is not a threshold for determining the significance of impacts. Appendix F merely seeks inclusion of information in the EIR to the extent relative and applicable to the Project. However, for determining the significance of an impact in this EIR, implementation of the Project would have significant energy impacts

if it results in the wasteful and inefficient use of non-renewable resources during manufacturing, installation, and operation of crop protection structures.

Manufacturing of crop protection structures would consume energy through the operation of manufacturing equipment in factories that make the steel and plastic for the crop protection structures. As the Project involves an amendment to the LUDC and not a specific development project, it is too speculative to quantify total energy consumption of future manufacturing, either in total or by fuel type. In addition, installation of the structures would consume energy through the operation of transportation vehicles. Although exact details of how many hoop and shade structures may be manufactured and installed as a result of Project implementation, there are no anticipated conditions that would require non-standard equipment or installation practices that would increase fuel-energy consumption above typical rates. Therefore, the Project would not result in a wasteful and inefficient use of non-renewable resources during the construction or ongoing operational use of crop protection structures.

Long-term operational energy use associated with the Project is not expected to result in the wasteful and inefficient use of non-renewable resources, as the crop protection structures do not require the use of electricity or other form of energy in order to be operable. Moreover, in order for farmers to qualify for the permit exemption, crop protection structures may not have electrical wiring, plumbing, mechanical (such as heaters), permanent footings, or foundations. While the operational aspect of the crop protection structures will not require the use of non-renewable resources, there may be electricity and natural gas consumption by agricultural operations, energy consumption related to obtaining water, and fuel consumption of vehicles. However, these energy-utilizing activities could occur regardless of whether crop protection structures are employed, as the agricultural operations could remain operable and functional without the structures in place. Therefore, the Project would not result in the wasteful or inefficient long-term operations use of energy and the Project's irreversible environmental changes would be less than significant.

### 7.3.2 Secondary Impacts

The Project would not increase development potential within the Project area, as the Project would simplify and streamline the permit process for hoop structures and shade structures to allow farmers more flexibility and efficiency in agricultural operations in support of the County's agricultural economy. The Project does not propose any construction activity, and would therefore not support growth that requires a significant enhancement of public services, transportation infrastructure, or other public services. As a result, significant environmental changes resulting from secondary impacts are not anticipated, and impacts would be less than significant.

### 7.3.3 Environmental Accidents

The Project would not be expected to result in environmental accidents that have the potential to cause irreversible damage to the natural or human environment. As discussed in Section 7.4.5 below, the County contains a number of regulated hazardous materials sites, resulting in the potential for past and/or ongoing site contamination within the areas zoned for agricultural production. Overall, there are 2,799 known, past, or existing regulated hazardous sites within the County (California Department of Toxic Substances Control 2007; State Water Resources Control Board 2015). The Project does not propose any development activity, and therefore, would not result in the upset of known contaminated sites/soils. The increased use of crop protection structures would not directly involve the use, transport, storage, and disposal of hazardous materials, as the operational requirements of the structures do not involve mechanical equipment or the use of hazardous materials in order to operate. Therefore, the Project's irreversible environmental changes associated with environmental accidents would be less than significant.

## 7.4 Effects Found Not to be Significant

Pursuant to CEQA Guidelines Section 15128, based upon initial environmental review and as stated in the Notice of Preparation distributed in 2017, the County determined that the Project has the potential to result in adverse effects on the environmental issue areas discussed in Chapter 4, Environmental Impact Analysis, based on the County Environmental Thresholds and Guidelines Manual (2015a) and Appendix G of the CEQA Guidelines. The Project was determined to result in less than significant impacts for the following issue areas.

### 7.4.1 Air Quality and Greenhouse Gas Emissions

Based on Appendix G of the CEQA Guidelines, impacts related to air quality would be significant if the Project would conflict with or obstruct implementation of the applicable air quality plan; violate any air quality standard or contribute substantially to an existing air quality violation; result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is in non-attainment under an applicable federal or state ambient air quality standard; expose sensitive receptors to substantial pollutant concentrations; create objectionable odors affecting a substantial number of people; generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment, or conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The County is located within the South Central Coast Air Basin (SCCAB), which is composed of three Air Pollution Control Districts (APCD), the San Luis Obispo APCD, Santa Barbara County APCD, and Ventura County APCD. The County's air quality and climate are influenced by the local topography as well as meteorological conditions. The semi-permanent high-pressure cell that lies off the Pacific Coast is a major contributor to weather and climate, which typically consists of warm, dry summers, and generates rainfall

(approximately 16 inches per year) during the colder winter season. As of 2015, the County ~~was is~~ in non-attainment of the ~~state 8-hour ozone standard and the state 10-micron particulate matter (PM<sub>10</sub>) standard~~ (Santa Barbara County Air Pollution Control District 2017). As of 2017, the County is in non-attainment-transitional for the state 1-hour and 8-hour ozone standards (California Air Resources Board 2017). The County is unclassifiable/attainment for the federal 2.5-micron particulate matter (PM<sub>2.5</sub>) and nitrogen dioxide standards and unclassified for the state PM<sub>2.5</sub> standard (Santa Barbara County Air Pollution Control District 2017).

The Project would not have the potential to result in significant impacts associated with air quality. The Project would amend the LUDC to revise and clarify the permitting requirements for hoop structures and shade structures on agriculturally zoned lands in the inland, unincorporated areas of the County, and as such, does not involve any significant emission generation activity.

While the Project itself does not involve any emission generating activity, implementation of the Project could result in an increase in installation of hoop structures and shade structures within the County. However, air quality and GHG emission impacts associated with the installation of hoop or shade structures would also be less than significant. Emission generating activity would be limited to the initial installation of the structures when the metal portions are bent in the field using specialized equipment. Hoop and shade structures are manufactured off-site and delivered to agricultural fields and installed in the field. Based on personal communication with Ari Tremblay with Ferrari Metals, a major manufacturer of agricultural crop protection structures, when the metal portion of hoop structures are first purchased from the manufacturer, the steel is delivered to farm fields and machinery is used in the field to bend the hoops to the desired shape. Once bent, these hoops can be reused multiple times and no additional machinery is involved to install, break down, or reuse the hoop structures (Ari Tremblay, pers. comm., 2017). The remainder of the installation process for hoop structures would not involve any machinery or equipment that would generate emissions. Shade structures are installed in the field without the use of specialized machinery to bend metal. Once hoop structures are bent in the field, they are estimated to last approximately 10 to 25 years depending on conditions (Ari Tremblay, pers. comm., 2017). Thus, other than the initial bending process for the metal portion of a hoop structure upon installation, implementation of the LUDC amendments and potential expansion of hoop and shade structures would not be associated with any air or GHG emissions. Thus, construction-related impacts related to air quality and GHG emissions as a result of installing crop protection structures would be less than significant.

The operation of crop protection structures would not generate significant air quality or GHG emissions. The ongoing use of these structures would not result in operational emissions, as the crop protection structures do not require emission-generating equipment in order to function. There are no mechanical or electrical components to the crop protection

structures, so once installed, no emissions are anticipated to occur, resulting in no impact associated with air (criteria pollutants) or GHG emissions.

Thus, the Project would not contribute to a violation of an air quality plan, violate any air quality standard, contribute to an existing air quality violation, or generate GHG emissions. In addition, since no operational emissions would be generated by implementation of the Project, it would not expose sensitive receptors to substantial pollutants or create odors affecting a substantial amount of people.

The Project would be consistent with the County's Energy and Climate Action Plan (ECAP). In 2015, the County adopted the ECAP, which seeks to reduce the County's GHG emissions through implementation of selected emission reduction measures with the goal of achieving a GHG reduction target of 15 percent below baseline emissions by the year 2020. The proposed Project would not generate substantial GHG emissions, as emissions would be limited to installation. Therefore, the Project would not directly involve any new development or GHG emission generating activities; therefore, the Project would not conflict with the goals of the ECAP, and impacts would be less than significant.

#### 7.4.2 Cultural Resources

Based on Appendix G of the CEQA Guidelines, impacts related to cultural resources would be significant if the proposed Project would cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5; cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5; or disturb any human remains, including those interred outside of formal cemeteries.

The Project area has been used and inhabited during multiple eras by Native American, Spanish, Mexican, and American people and contains significant cultural resources, many of which remain intact and well preserved. The Project would not have the potential to result in significant impacts associated with cultural resources. The Project would amend the 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, and as such, the Project would not result in any ground disturbance, grading, removal of earth, or the disturbance or demolition of a historical resource, resulting in no impact.

Cultural resource impacts associated with the installation and operation of hoop or shade structures would be less than significant. Installation and operation of crop protection structures do not require substantial grading or ground disturbance. Any grading or ground disturbance that might occur on agriculture lands that contain the structures would be associated with the associated agricultural operation and would not be a result of the use of a crop protection structure. In addition, the installation and operation of the crop protection

structures would not require the demolition or disturbance of any historical structure that exists within the County. Thus, impacts would be less than significant.

#### 7.4.3 Electromagnetic Fields

According to the County's thresholds, electromagnetic fields (EMFs) of primary concern include both extremely low frequencies and higher frequencies. Common sources of low frequency EMF include emissions from facilities such as power lines, electrical appliances, home and commercial building wiring, etc. Common sources of higher radio frequency emissions include equipment used for communications, radar, and microwave equipment. The Project area, which covers all of the AG-I and AG-II land within the Inland Area, is characterized as primarily rural with low-density development in certain areas. The Project is not introducing new land uses that would be associated with EMF. Therefore, impacts would be less than significant.

#### 7.4.4 Geologic Hazards/Soils/Mineral Resources

Based on Appendix G of the CEQA Guidelines, impacts related to geologic hazards/soils/mineral resources would be significant if the Project would: (1) expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving rupture of a known earthquake fault as delineated on the most recent Alquist–Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; (2) expose people or structures to strong seismic ground shaking, seismic-related ground failure, including liquefaction, or landslides; (3) result in substantial soil erosion or the loss of topsoil; (4) be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse; (5) be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property; (6) result in a loss of availability of a known mineral resource that would be of value to the region and the residents of the state; or (7) result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

The Project would not have the potential to result in significant impacts associated with geologic hazards/soils/mineral resources. The Project would amend the 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. As such, the Project would not expose people or structures to geologic hazards, or directly result in impacts due to soil conditions. Also, the Project would not redesignate land to Urban uses, and therefore, would not result in the loss of important mineral resources. Impacts would be less than significant.

While project implementation could result in an increase in hoop structures and shade structures within the County, installation and operation of these structures would not



result in significant impacts associated with geologic hazards/soils/mineral resources. The crop protection structures, once installed, would be located upon land that has been previously used for or has been zoned for agricultural production. The overall acreage of land that these structures would be permitted on is approximately 927,014 acres. As such, crop protection structures could be placed upon lands subject to geological hazards, including landslides, steep slopes or soils prone to erosion, liquefaction, expansion, contraction, or ground failure. However, existing County policies and regulations would address most of the potential geologic impacts associated with hoops structures. All hoop structures would be required to comply with the County Building Code. In addition, a development plan would be required under the LUDC amendment for hoops structures that exceed 20 feet in height. The LUDC amendment would also include the criteria and development standards with which a hoop structure must comply in order to remain exempt from requiring a permit, as well as development standards that would reduce any potential adverse effects arising as a result of hoop structure use. As such, impacts associated with installation and operation of hoop structures would not result in significant impacts due to geologic hazards and soil conditions, and impacts would be less than significant.

Impacts associated with mineral resources would be less than significant. Three major classes of mineral resources have been found within the County: petroleum and natural gas; metallic resources (mercury); and non-metallic resources (diatomite, limestone, phosphate, rock, sand, and gravel) (County of Santa Barbara 2010b). The crop protection structures would be located within lands zoned AG-I and AG-II within the Inland Area. These zones also allow for mining activity, and as such, could be mined in the future. As such, crop protection structures would not preclude future use of the land for mineral resources, impacts would be less than significant.

#### 7.4.5 Hazardous Materials/Risk of Upset

Based on Appendix G of the CEQA Guidelines, impacts associated with hazardous materials, risk of upset or accident conditions would be significant if the proposed Project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school; and/or be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.

The County contains a number of regulated hazardous sites, resulting in the potential for past and/or ongoing site contamination within the areas zoned for agricultural production. Potentially hazardous materials that currently occur throughout the County are commonly found in agricultural areas, which generally include pesticides and herbicides. Overall,

there are 2,799 known, past, or existing regulated hazardous sites within the County (State Water Resources Control Board 2015; California Department of Toxic Substances Control 2007). In addition, agricultural production activities typically involve the use of regulated hazardous materials, such as pesticides.

Although hazardous sites and conditions exist within agricultural land in the County, the Project would not have the potential to result in significant impacts associated with hazardous materials or accident and upset conditions. The Project would amend the 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, and as such would not result in any physical change to the existing environment that may expose people to hazardous materials and/or accident or upset conditions, resulting in no impact.

In addition, while Project implementation could result in an increase in hoop structures and shade structures in the County, installation and operation of these structures would not result in the transport of hazardous materials, as the crop protection structures are not hazardous materials. In addition, the use of these structures would not cause or generate accident or upset conditions, as the use of pesticides or other hazardous materials associated with ongoing agricultural operations would occur regardless of whether the structures are installed. Therefore, impacts associated with installation and operation of the structures would be less than significant.

#### 7.4.6 Noise

Based on Appendix G of the CEQA Guidelines, impacts associated with noise would be significant if the proposed Project would expose persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies; expose persons to or generation of excessive groundborne vibration or groundborne noise levels; result in a substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project; result in a substantial temporary or period increase in ambient noise levels in the Project vicinity above levels existing without the Project; for a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the Project area to excessive noise levels; and/or for a project within the vicinity of a private airstrip, expose people residing or working in the Project area to excessive noise levels.

Major sources of noise within the County are primarily transportation-related and include U.S. Highway 101 (US 101) and State Route 1 (SR 1) and the Union Pacific Railroad. Some additional noise sources are generated by ongoing operation of farm equipment and agricultural operations as well as construction, energy production and commercial activities. In addition, the Vandenberg Air Force Base and five public airports generate noise during operation of aircraft and machinery. Within agricultural areas, natural and

agricultural-related noise conditions generally dominate the area because human activity is limited. Noise levels are occasionally elevated due to nearby traffic and agricultural machinery and practices. Production agriculture can generate noise due to the use of agriculture machinery and practices (County of Santa Barbara 2009d).

The Project would not have the potential for significant impacts associated with noise. The Project would amend the 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, and therefore, does not involve any noise generating activity, resulting in no impact.

In addition, while project implementation could result in an increase in use of hoop structures and shade structures in the County, installation of these structures would not involve any substantial permanent increase in noise levels, as installation activity would be temporary in nature. In addition, the crop protection structures would not result in an increase in operational noise, as they would not contain electrical wiring, plumbing, or other mechanical equipment in order to qualify for permit exemption. Noise impacts associated with installation and operation of the structures would be less than significant.

#### 7.4.7 Population and Housing

Based on Appendix G of the CEQA Guidelines, impacts related to population and housing would be significant if the Project would induce substantial population growth in an area, either directly or indirectly and/or displace substantial numbers of existing housing or substantial numbers of people, necessitating the construction of replacement housing elsewhere.

The Project would not have the potential to result in significant direct or indirect impacts associated with population and housing. The Project would amend the 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. As such, the Project would not induce substantial population growth, as no land use designation changes are proposed under the Project that would allow for additional housing within the County. In addition, the Project would not include any zoning or land use changes that would result in the removal of a significant number of homes, as the Project would only be applicable to areas zoned as AG-I and AG-II, which are primarily used for agricultural operations. Therefore, implementation of the Project would not displace a substantial number of existing housing or people, nor would it necessitate the construction of replacement housing elsewhere. As such, the Project would not generate any significant impact associated with population and housing, resulting in a less than significant impact.

#### 7.4.8 Public Services and Facilities

Based on Appendix G of the CEQA Guidelines, impacts related to public services and facilities would be significant if the Project would: expose people or structures to a

significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands; and/or result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: fire protection, law enforcement, schools, and recreation.

#### a. Fire Protection/Emergency Services

Fire protection and emergency medical services within the County are provided by the Santa Barbara County Fire Department (Fire Department), which operates a total of 16 stations and one headquarters location. The Santa Maria Valley Region is home to three stations (Station 21, 22, and 23). The Lompoc Valley Region is home to one station (Station 51). The Santa Ynez Valley Region is home to four stations (Stations 24, 30, 31 and 32). The South Coast/Gaviota Region is home to seven stations and the headquarters (Stations 11, 12, 13, 14, 15, 17 and 18). The Cuyama Valley Region is home to one station (Station 41). In addition, the Fire Department contains two battalions (Battalion 1 South (seven stations) and Battalion 2 North (nine stations), three divisions (Support Services, Fire Prevention, Operations), and approximately 260 full-time employees (County of Santa Barbara Fire Department 2016).

The Project would not have the potential to result in significant impacts associated with fire protection and emergency services. The Project would amend the 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. As such, the Project would not require any new fire protection facilities or require the alteration of existing facilities. While agricultural land within the County may be adjacent to wildland areas and subject to wildland fires, implementation of the Project would not impact fire response times, as no changes to the existing roadway network are proposed. In addition, no change in land use is proposed, so while the Project may result in the increase of installation and operation of crop protection structures that may be placed in high fire hazard zone areas, they would not increase fire hazards as they do not contain electrical components, do not extend completely to the ground, and have no permanent foundations, and as such, would not require implementation of any fire safety measures or standards, resulting in no impact.

#### b. Law Enforcement

The Santa Barbara County Sheriff's Department (Sheriff's Department) provides law enforcement services for the County. The Sheriff's Department consists of nine substations, of which are located in Carpinteria, Goleta Valley, the City of Goleta, the Isla Vista Foot Patrol, Lompoc, City of Buellton, City of Solvang, Santa Maria, and New Cuyama. Within the Sheriff's Department, there are three divisions, which include Criminal Investigations, North County Operations, and South County Operations. Law enforcement services are

also provided by California State Parks Department ranger station located in Refugio State Park, the California Highway Patrol substations located in Goleta and Buellton. The U.S. Forest Service is responsible for law enforcement in Los Padres National Forest. The Los Padres National Forest headquarters is located at 6755 Hollister Avenue, Suite 150 in Goleta, California (County of Santa Barbara Sheriff's Department 2015).

The Project would not have the potential to result in significant impacts associated with law enforcement services. The Project would amend the 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. As such, the Project would not require any new law enforcement facilities or require the alteration of existing facilities. In addition, implementation of the Project, which could result in the increased installation and operation of crop protection structures, would not impact law enforcement response times, as no changes to the existing roadway network are proposed, resulting in no impact.

#### c. Schools

There are 20 school districts serving over 60,000 students throughout the County, and two community college districts serving over 28,000 students. Operating revenue provided to school districts is generated by local property taxes accrued at the state level and then allocated to each school district based on average daily student attendance. Because state funding for capital improvements has historically lagged behind enrollment growth, physical improvements to accommodate new students are funded primarily by public debt supplemented by fees assessed on development projects (Santa Barbara County Education Office 2017).

The Project would not have the potential to result in significant impacts associated with school facilities. The Project would amend the 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. As such, the Project would not generate a new student population, and would therefore not require any new or expanded school facilities, resulting in no impact.

#### d. Recreation

The Santa Barbara County Community Service Department – Parks Division maintains 24 day-use parks, two camping parks, 45 open spaces and 12 beach areas for a total of approximately 8,595 acres of recreation and open space areas (County of Santa Barbara 2017f).

The Project would not have the potential to result in significant impacts associated with recreation facilities. The Project would amend the 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. As such, the Project

would not generate a new population base, and would therefore not require any new or expanded recreation facilities, resulting in no impact.

#### 7.4.9 Traffic and Transportation

Based on Appendix G of the CEQA Guidelines, impacts related to traffic and transportation would be significant if the Project would: conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system taking into account all modes of transportation, including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit; conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways; result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial risks; substantially increase hazards because of a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); result in inadequate emergency access; and/or conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease performance or safety of such facilities.

The transportation network within the County consists of approximately 2,054 miles of maintained public roadways, 338 miles of Class I, II and III bikeways, 13 public transit service systems and other private transportation services, three railroad operators, five public airports, and one harbor facility (Santa Barbara County Association of Governments 2017). There are no interstate highways within the County; the County is primarily served by US 101 and SR 1. Two rail companies operate within the County: Union Pacific has a Class I rail line that traverses the County from north to south, adjacent to the US 101 corridor. The Santa Maria Valley Railroad has 14 miles of private rail line between Santa Maria and Guadalupe, and connects with the Union Pacific railroad in Guadalupe. The closest intercity transit service is provided by Amtrak, with stops at the City of Goleta, Surf, and Guadalupe (Santa Barbara County Association of Governments 2017).

The Project would not have the potential to result in significant impacts associated with traffic and circulation. The Project would amend the 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 Project does not include any proposed changes to the existing roadway and circulation network, resulting in no impact. In addition, the installation and operation of crop protection structures on agricultural fields would not change the number of vehicular trips typically associated with an agricultural operation. As such, the Project would not generate any significant transportation and circulation impacts, resulting in a less than significant impact.

#### 7.4.10 Utilities

Based on Appendix G of the CEQA Guidelines, impacts related to utilities and service systems would be significant if the Project would: exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board; require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects; require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which would cause significant environmental effects; have insufficient water supplies available to serve the Project from existing entitlements and resources, thereby requiring new or expanded entitlements; result in a determination by the wastewater treatment provider which serves or may serve the Project that it has inadequate capacity to serve the Project's projected demand in addition to the provider's existing commitments; be served by a landfill with insufficient permitted capacity to accommodate the Project's solid waste disposal needs; or fail to comply with federal, state, and local statutes and regulations related to solid waste.

Storm water and runoff, along with solid waste impacts, are addressed in Sections 4.4 and 4.5, respectively.

##### a. Water Supply and Potable Water

Sixteen water purveyors provide water supply services throughout the County. Water supply for these agencies primarily comes from groundwater, while other sources include surface water from local reservoirs and purchased or imported water from the State Water Project (County of Santa Barbara 2017d).

The Project would not have the potential to result in significant impacts associated with the potable water supply and distribution system. The Project would amend the 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. As such, the Project would not generate a new population base or housing, and would therefore not require any new or expanded potable water supply or distribution system. In addition, the Project would not result in the creation of new agricultural land within the County, resulting in no impact.

In addition, while implementation of the Project could result in the increased installation and operation of hoop structures and shade structures within the County, an expansion of land where agricultural operations are allowed would not occur; therefore, water supply needs would remain the same as the existing condition, regardless of whether additional crop protection structures are installed and utilized. Impacts associated with the installation and operation of crop protection structures would be less than significant.

## b. Wastewater

The Central Coast Regional Water Quality Control regulates discharge permits for municipalities and special districts that operate wastewater treatment plants. To manage wastewater services, the County delegates the management of wastewater systems to 17 wastewater service providers/districts, which serve at least some portion of unincorporated County lands within each district or treat wastewater collected by neighboring districts. In areas that are not served by municipalities or special districts, wastewater is typically treated through private sewage disposal systems.

The Project would not have the potential to result in significant impacts associated with wastewater treatment requirements or capacity. The Project would amend the 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. As such, the Project would not result in wastewater generation, resulting in no impact.

In addition, wastewater impacts associated with the installation and use of hoop or shade structures would be less than significant. While implementation of the Project could result in an increased use of hoop structures and shade structures within the County, installation and operation of these structures would not require the construction of new wastewater infrastructure, as the installation and use of these structures does not involve any significant wastewater generating activity. The project would not increase the demand for any wastewater services for farmworkers (typically portable toilets) beyond the existing condition. Moreover, any wastewater generated by the agricultural operations would occur regardless of whether the crop protection structures are installed and utilized, since the agriculture operations would continue to exist with or without the structures. Therefore, installation and operation of the structures is not anticipated to generate wastewater beyond that already anticipated by the agricultural operations. In addition, any new agricultural operations resulting from implementation of the Project would be subject to existing policies and regulation relating to the appropriate management of wastewater, including disposal and treatment of wastewater. Impacts associated with installation and operation of the crop protection structures would be less than significant.

### 7.4.11 Water Resources

Based on Appendix G of the CEQA Guidelines, impacts related to water resources would be significant if the Project would expose people or structures to inundation by seiche, tsunami, or mudflow.

The Project would not have the potential to result in significant impacts associated with seiche, tsunamis, or mudflow. The Project would amend the 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. As such, the Project would not result in the placement of housing or structures within 100-year flood zones, resulting in no impact.



Based on the California Emergency Management Agency Tsunami Inundation Maps for Emergency Planning, no portions of the Project area are located within a mapped tsunami inundation zone, resulting in no impact (California Emergency Management Agency 2009). There are several lakes subject to seiche within the County, the largest being Lake Cachuma. Other water bodies subject to seiches are Twitchell and Gibraltar reservoirs, Jameson and Zaca lakes and Sheffield Dam. In addition to small waves initiated by ground shaking which might affect the local shoreline, larger waves can be generated by large landslides triggered by an earthquake. These waves could overtop a dam and cause damage to property lying downstream (County of Santa Barbara 2015d). While there exists within the County the potential for seiche or mudflow to occur, the Project would not expose people to potential a significant risk of loss due to seiche or mudflow, since the crop protection structures do not provide any habitable structure. Impacts would be less than significant.

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