

Appendix - A

Scoping

Notice of Preparation (NOP)

Matrix of Responses

Comment Letters

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County of Santa Barbara Planning and Development

Glenn S. Russell, Ph.D., Director
Dianne Black, Assistant Director

NOTICE OF PREPARATION

DATE: July 12, 2017

TO: State Clearinghouse
1400 Tenth Street
Sacramento, CA 95814

FROM: County of Santa Barbara
Planning and Development Department
Long Range Planning Division
123 E. Anapamu Street
Santa Barbara, CA 93101-2058
(805) 568-2048

SUBJECT: Notice of Preparation and Scoping of an Environmental Impact Report (EIR)

PROJECT NAME: Cannabis Land Use Ordinance and Licensing Program EIR

PROJECT CASE NO.: 17ORD-00000-00004

PROJECT LOCATION: The Cannabis Land Use Ordinance and Licensing Program (collectively, "Project") involves the unincorporated (coastal and inland) areas of Santa Barbara County.

LEAD AGENCY: The County of Santa Barbara is the lead agency preparing the EIR with the purpose of informing decision-makers and the public regarding the potential environmental effects related to the Project in compliance with the California Environmental Quality Act (Public Resources Code § 21000 et seq.).

PROJECT DESCRIPTION: The Project would amend the Santa Barbara County Land Use and Development Code, Santa Barbara County Montecito Land Use and Development Code, and Santa Barbara County Coastal Zoning Ordinance to allow certain types of cannabis activities by zone district. The Project also involves other amendments to the County Code, in order to establish a County licensing program for cannabis-related activities.

The project description, location, and potential environmental effects are included in the attached *Environmental Scoping Document for the Cannabis Land Use Ordinance* and may be downloaded from the Planning and Development Department, Long Range Planning Division webpage at: <http://longrange.sbcountyplanning.org/programs/Cannabis/cannabis.php>

PUBLIC ENVIRONMENTAL SCOPING MEETINGS: The Planning and Development Department will hold two environmental scoping meetings:

Santa Barbara
Wednesday, July 26, 2017, at 5:30 p.m.
Board Hearing Room
Fourth Floor
105 East Anapamu Street

and

Santa Maria
Thursday, July 27, 2017, at 5:30 p.m.
Betteravia Government Center
511 East Lakeside Parkway

The purpose of the meetings is to receive comments on the scope and content of the environmental issues to be addressed in the EIR.

PUBLIC AND AGENCY COMMENTS: We need to know the views of you or your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the EIR prepared by our agency when considering your permit or other approval for the project.

Your response must be received no later than 5:00 p.m. on Friday, August 11, 2017. Please send your comments and the name of a contact person in your agency to Jessica Metzger, Project Manager, at the address listed above.

Date: July 12, 2017
Planner: Jessica Metzger
Division: Long Range Planning
Telephone: (805) 568-3532
Email: jmetzger@countyofsb.org

cc: Clerk of the Board
Encl: Scoping Document



COUNTY OF SANTA BARBARA

Planning and Development

www.sbcountyplanning.org



Environmental Scoping Document for the Cannabis Land Use Ordinance and Licensing Program

Project Website:

<http://longrange.sbcountyplanning.org/programs/Cannabis/cannabis.php>

Contact:

Jessica Metzger, Project Planner

(805) 568-3532

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Long Range Planning Division

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1.0 Purpose

This environmental scoping document describes the Cannabis Land Use (CLU) Ordinance and licensing program (collectively, “Project”) and provides a preliminary review of the Project’s potential environmental impacts in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et seq.). This scoping document, along with comments received in response to the Notice of Preparation (NOP) of the Environmental Impact Report (EIR) for the Project, will assist the County of Santa Barbara, as the lead agency for the preparation of the EIR for the Project, in identifying environmental impacts that must be evaluated in the EIR.

2.0 Background

CEQA requires the preparation of an EIR to inform the public and decision-makers of the potential environmental effects of the proposed regulations. According to CEQA Guidelines Section 15151, an EIR should include a sufficient degree of analysis, or scope, to provide decision-makers with information that enables them to make a decision which intelligently takes account of environmental consequences.

The EIR for the Project will evaluate the environmental impacts of anticipated activities resulting from the implementing ordinance language for land use entitlements and licenses, which constitute the Project. The environmental analysis will be based on the Project Description and draft ordinance; although, changes to the language may be required based on results of the environmental review and decision-making phases of the Project.

3.0 Project Description

This section describes the proposed Project including the applicant/lead agency, Project location, existing environmental setting, regulatory setting, summary of the Project, and Project adoption and implementation actions.

3.1 Project Applicant/Lead Agency

The County of Santa Barbara is both the project applicant and the lead agency for the proposed Project.

3.2 Project Location

The Project involves amendments to the Santa Barbara County Land Use and Development Code, Santa Barbara County Montecito Land Use and Development Code, and Santa Barbara County Coastal Zoning Ordinance. These ordinance amendments (hereafter referred to as a single ordinance) will regulate medical and nonmedical cannabis activities in the unincorporated areas of Santa Barbara County, including the coastal zone (Figure 1), excluding land under the jurisdiction of incorporated cities, the federal government (Los Padres National Forest and Vandenberg Air Force Base), and the University of California Santa Barbara (UCSB).

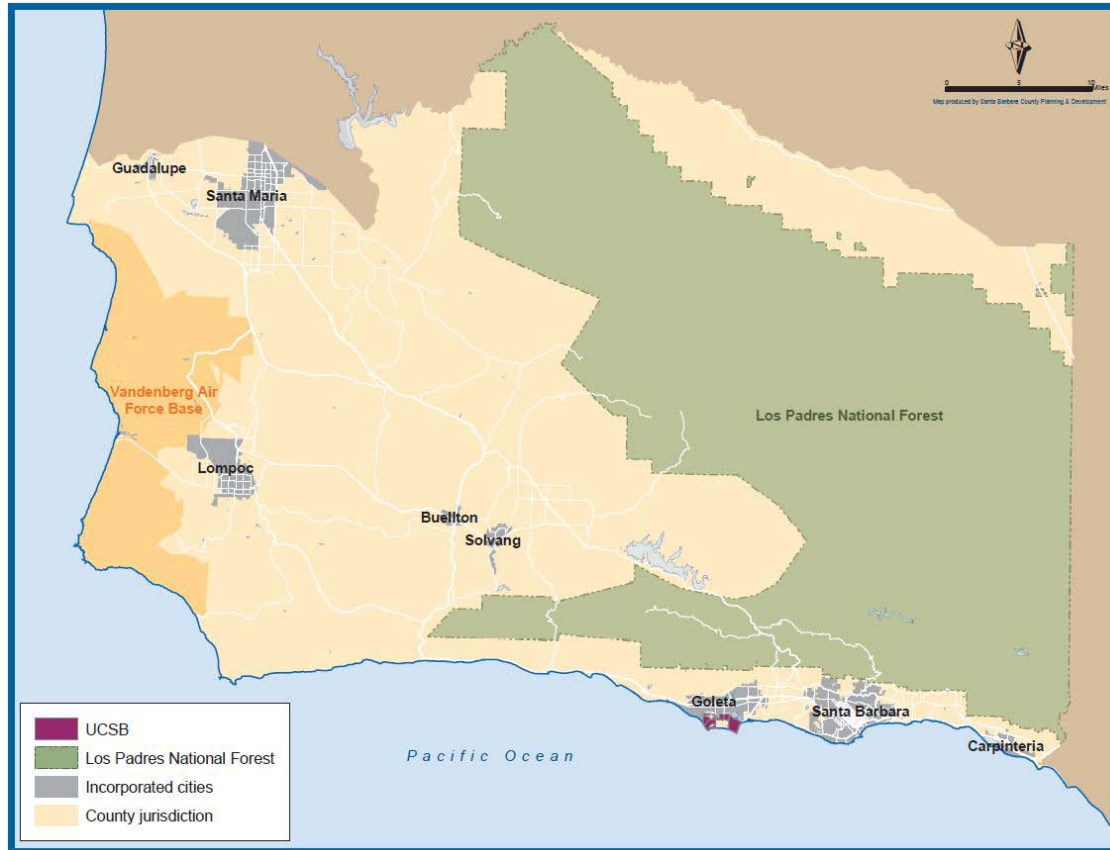


Figure 1. Santa Barbara County Jurisdictional Map

3.3 Regulatory Context

In 1996, California voters passed Proposition 215, the Compassionate Use Act of 1996 (CUA). The purpose of the CUA was to “ensure that seriously ill Californians have the right to obtain and use cannabis for medical purposes where that medical use is deemed appropriate and has been recommended by a physician” (Health & Safety Code section 11362.5(b)(1)(A)). In addition, patients and primary caregivers would not be subject to criminal prosecution or sanction (Ibid section 11362.5(b)(1)(B)). Two additional medical cannabis laws were enacted by the State. In 2003, the State adopted the Medical Cannabis Program Act and in 2016, the State adopted the Medical Cannabis Regulation and Safety Act (MRCSA). In response, the County adopted ordinances banning both medical cannabis dispensaries and medical cannabis cultivation, with limited exceptions, in the unincorporated areas of the County.

On November 8, 2016, the voters of the State of California approved Proposition 64, the Control, Regulate and Tax Adult Use of Marijuana Act (also known as the Adult Use of Marijuana Act, or AUMA). The AUMA establishes a comprehensive system to legalize, control, and regulate the cultivation, processing, manufacturing, distribution, testing, and sale of nonmedical cannabis, including cannabis products, for use by adults 21 years and older, and to tax the growth and retail sale of cannabis. It also sets forth provisions for the cultivation of industrial hemp. The AUMA

requires a state license to engage in commercial nonmedical cannabis activity and requires the State to start issuing licenses by January 1, 2018. Nonmedical cannabis operators will have to conform to all state regulations and the issuance of these licenses will also require the local jurisdiction's approval if the County adopts regulations in accordance with Business & Professions Code section 26200.

On June 27, 2017, Governor Jerry Brown signed SB-94, which combines the medical and recreational cannabis laws into one regulatory system known as the Medicinal and Adult-Use Cannabis Regulation and Safety Act (MAUCRSA). Among other things, the new law outlines the State-Local licensure process, clarifies law enforcement requirements, and establishes taxation plans.

None of the above regulations limit the authority of a local governing body to adopt and enforce local ordinances regulating or completely prohibiting state-licensed cannabis operations. Moreover, local jurisdictions may regulate or ban all outdoor cultivation and may impose reasonable regulations on personal cultivation (Health and Safety Code section 11362.2(3)(b)). The CLU Ordinance draft language is provided in Attachment A.

3.4 Summary of Proposed Ordinance and Licensing Program

The draft CLU Ordinance to be analyzed in the EIR would allow certain types of cannabis activities by zone district as described below:

- Allow cultivation of cannabis in Agricultural I (AG-I), Agricultural II (AG-II), Industrial Research Park (M-RP), Light Industry (M-1), and General Industry (M-2) zone districts.¹
- Allow manufacturing of non-volatile extraction in Agricultural I (AG-I), Agricultural II (AG-II), Limited Commercial (C-1), Retail Commercial (C-2), General Commercial (C-3), Community Mixed Use - Los Alamos (CM-LA), Service Commercial (SC), Mixed Use (MU), Industrial Research Park (M-RP), Light Industry (M-1), and General Industry (M-2) zone districts.
- Allow manufacturing of volatile extraction in Agricultural II (AG-II), Light Industry (M-1), and General Industry (M-2) zone districts.
- Allow post-processing and packaging in Agricultural I (AG-I), Agricultural II (AG-II), Limited Commercial (C-1), Retail Commercial (C-2), General Commercial (C-3), Community Mixed Use - Los Alamos (CM-LA), Service Commercial (SC), Mixed Use (MU), Industrial Research Park (M-RP), Light Industry (M-1), and General Industry (M-2).
- Allow testing in General Commercial (C-3), Community Mixed Use - Los Alamos (CM-LA), Service Commercial (SC), Mixed Use (MU), Industrial Research Park (M-RP), Light Industry (M-1), General Industry (M-2), and Professional and Institutional (PI).

¹ Personal cultivation and consumption of cannabis would be allowed in all zones that allow a residential use (e.g., single-family dwelling in a residential zone, or caretaker's residence in an industrial zone).

- Allow commercial retail sales in Limited Commercial (C-1), Retail Commercial (C-2), General Commercial (C-3), Service Commercial (SC), Mixed Use (MU), and Light Industry (M-1) zone districts.
- Allow wholesale commercial sales in General Commercial (C-3), Industrial Research Park (M-RP), Light Industry (M-1), and General Industry (M-2).
- Prohibit cannabis activities in all other zone districts including all Residential,² Mountainous Areas, Highway Commercial (CH), Resort/Visitor Serving Commercial (C-V), Coastal Dependent Industry (M-CD), Coastal Related Industry (M-CR), Public Works Utilities and Private Service Facilities (PU), Recreation District (REC), Resource Management (RES), and Transportation Corridor (TC) zone districts.

3.5 Adoption and Implementation

The Montecito and County Planning Commissions will consider and advise the Board of Supervisors (BOS) regarding the adoption of the CLU Ordinance. In addition to the CLU Ordinance, the BOS will consider amendments to the County Code to establish a local licensing program for cannabis activities. The BOS will need to take the following actions in order to implement the Project:

1. Adoption of environmental findings, certification of the EIR, and, if needed, adoption of a Statement of Overriding Considerations for any unavoidable, significant environmental impacts that will result from the Project;
2. Adoption of amendments to the Santa Barbara County Land Use and Development Code, Santa Barbara County Montecito Land Use and Development Code, and Santa Barbara County Coastal Zoning Ordinance, to establish the land use regulations that will pertain to cannabis activities;
3. Adoption of amendments to the Santa Barbara County Code to establish a local licensing program for cannabis activities; and
4. Possibly, the adoption of amendments to the Santa Barbara County Uniform Rules for Agricultural Preserves and Farmland Security Zones.

In addition to the actions set forth above, the Coastal Commission must certify any amendments to the Local Coastal Program (LCP)—including the Article II Coastal Zoning Ordinance, as the implementing ordinance of the LCP.

4.0 Scope of the Environmental Review

4.1 Overview

CEQA requires the preparation of an EIR to inform the public and decision-makers of the potential environmental effects of the Project. This includes any potential environmental effects resulting from the regulation of the cultivation, processing, manufacturing, distribution, testing, sale of cannabis (including cannabis products), retail sale of cannabis, and the cultivation of

² See footnote 1, above—cannabis cultivation and consumption for personal use, under certain conditions, is exempt from local and State licensing and permitting requirements.

industrial hemp as described in the CLU Ordinance draft language. According to CEQA Guidelines Section 15151, “[a]n EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences.”

4.2 Environmental Topics to be Analyzed in the EIR

CEQA Guidelines Section 15060(d) states that an initial study is not required in cases where preparation of an EIR is determined to be clearly required by the lead agency. Accordingly, an Initial Study for the Project is not provided herein. However, the preliminary review of the Project identified the following issue areas for evaluation in the EIR. Additional environmental topics beyond what is set forth below might be added to the EIR, based on comments received in response to the NOP for the EIR and Draft EIR that will be prepared for the Project.

4.2.1 Aesthetics and Visual Resources

The EIR will assess the Project’s potential impacts to visual and scenic resources and identify mitigation measures as necessary. This includes characterization of the existing physical setting; identification of potential impacts upon the character of scenic areas, gateways, relevant aspects of the built environment, public open spaces, and recognized landmarks; evaluation of consistency with routes in the County designated for protection under California’s Scenic Highway Program, and cumulative effects to public vistas and scenic routes.

4.2.2 Agricultural Resources

The EIR will describe the existing agricultural operations in the County, including cultivated agriculture, grazing and equestrian operations, crop types and acreages, and general locations based on available data from existing sources; assess whether the proposed Project is consistent with existing agricultural preservation policies and programs or has the potential to result in potentially significant adverse effects to prime soils, state designated important farmlands (Prime, Statewide, Local, or Unique), or grazing lands. The EIR will also assess whether the Project will cause potential impacts to agricultural resources, including potential conversion of agricultural land, including Williamson Act lands, to non-agricultural uses or result in land use conflicts that impact nearby agricultural operations. The Project EIR will identify mitigations for potentially significant impacts, where feasible.

4.2.3 Air Quality and Greenhouse Gas (GHG) Emissions

Describe existing conditions within the South Central Coast Air Basin and in the Project vicinity, including attainment status for criteria pollutants, climatic conditions, and local emissions sources and sensitive receptors, such as schools, elder care facilities, park visitors and adjacent neighborhoods; provide a brief description of the current regulatory setting regarding Air Quality and GHGs, including APCD rules related to odors; and assess the potential air quality impacts from the processing and manufacturing of cannabis, as well as potential impacts to air quality and GHG emissions from project-related vehicle trips. The Project’s potential to create objectionable odors will also be analyzed in this section of the EIR. The EIR will identify the need for mitigation of significant impacts. It will also assess consistency with the policies and measures in the County’s Energy and Climate Action Plan (ECAP).

4.2.4 Biological Resources

The Project could result in impacts to sensitive species and their habitats. The EIR will discuss the special status plant and wildlife species and habitat found within the Project area and analyze the potential for significant project-specific and cumulative effects to biological resources. It will also identify feasible mitigation measures necessary to reduce or avoid significant impacts to these resources.

4.2.5 Cultural

The EIR will identify the general geology and paleontology of the County; provide a brief overview of the County's history, including the Native American, Spanish/Mexican and American periods; describe existing known cultural resources, including general description of known pre-historic sites and the locations of known historic structures; address consultation with the Native American individuals and organizations that may be knowledgeable about the County; assess the potential for archaeological and historical resource impacts from the Project including cumulative impacts; and identify mitigation measures as necessary.

The EIR will summarize the County's Assembly Bill (AB) 52 tribal consultation as well as Senate Bill (SB) 18 consultation prior to amending or adopting any general plan amendment, if needed.

4.2.6 Geology and Soils

The EIR will describe the existing geologic setting, including a general characterization of County terrain, soils, seismicity, and other geologic features, such as groundwater basins and faults; describe the existing regulatory setting, including the County's Seismic Safety and Safety Element, Grading Ordinance, existing community plans and Land Use Element policies, the Alquist-Priolo Act, Uniform Building Code, etc.; assess direct, indirect, and cumulative geologic hazards and impacts posed by new cannabis cultivation and related operations, including grading for terracing and access roads; and identify recommended mitigation measures as needed to address geologic impacts, building from the California Building Code and the County Code.

4.2.7 Hazards and Public Safety

The EIR will describe the hazards and hazardous materials setting for the County based on existing reports and maps; assess hazards and hazardous materials impacts from cultivation and manufacturing sites by considering storage, handling, and application practices of hazardous materials; and identify mitigation measures necessary to address hazards and hazardous material concerns, including consideration of existing regulation and best management practices (BMPs) or development standards to address how and where hazardous materials would occur on cultivation sites. The EIR will further assess the Project for consistency with requirements in federal, state, and county regulations of hazardous materials.

4.2.8 Hydrology and Water Resources

Construction of new cultivation sites could impact in-stream water quality and hydrology through increased grading, vegetation clearing, erosion, and sedimentation or be impacted by flood flows from nearby rivers and creeks. The EIR will describe the existing hydrologic setting,

provide an estimate of current water use, describe the existing regulatory setting for management of ground and surface waters within the County, and analyze potential impacts to water supply, including supplies from groundwater. The EIR will also review the potential for significant impacts related to water quality and/or drainage/flooding, and will identify mitigation measures where necessary.

4.2.9 Land Use and Planning

The CLU ordinance would apply to the unincorporated County—specifically, certain agricultural, commercial, mixed use, and industrial zoned properties—and would regulate the cultivation, manufacturing, distribution, and sale of cannabis. The EIR analysis will examine the Project and identify potential land use conflicts and quality of life impacts.

In addition, the Project will involve regulations that will apply to cannabis activities in the Coastal Zone. The EIR will include an analysis of the consistency of the Project with coastal land uses and any potential significant adverse impacts on coastal resources resulting from the Project.

Cultivation

Potential land use conflicts between agriculture and residences may result from normal agricultural practices, such as noise, dust, and lights, as well as potential land use conflicts that are unique to the cultivation of cannabis (e.g., odors) as compared to other agricultural products.

Manufacturing

Potential land use conflicts between existing manufacturing uses and this new proposed use may result from the additional security measures that cannabis manufacturers would install on the site, including additional lights and fencing.

Commercial Sales

Commercial sales are anticipated to occur in existing buildings. No additional impacts are foreseen besides indirect impacts associated with public safety and services, which will be analyzed separately in the EIR.

The EIR will identify potential mitigation measures as needed to address any adverse land use impacts, including adjustments in proposed geographic restrictions, cultivation limits, and setbacks.

4.2.10 Noise

The Project EIR will describe the existing noise setting, focusing on roadway corridor and agricultural operation-related noise particularly in relation to proximity with sensitive receptors, consider both short-term construction impacts and long-term operational impacts; analyze long-term impacts based on potential increased traffic along roadways associated with changes or intensification of cannabis-related operations; analyze noise caused by cannabis processing facilities and cultivation areas that may require electricity by a generator. Mitigation measures will be identified for locations where noise levels may exceed regulatory standards or cause a substantial increase in the ambient noise levels for adjoining areas.

4.2.11 Public Services

The Project may incrementally increase demand for public services, particularly fire and police protection. Incremental increases in demand for code enforcement along with other services (e.g., road maintenance) may also occur. The EIR will assess existing service capabilities of applicable public services such as schools, police protection, and fire protection; assess fire protection issues and potential increases in demand for other public services associated with cannabis cultivation and production sites while accounting for existing regulations and development standards; identify Project impacts to established service standards, including emergency response standards. Where feasible, mitigation measures will be proposed to reduce or eliminate significant impacts.

4.2.12 Transportation and Circulation

Traffic and circulation impacts may result from the distribution of cannabis, the establishment of cultivation sites, and from consumers traveling to and from commercial retail locations. The EIR will review existing County traffic volume data, project trip generation/distribution, level of service calculations, accident data, and safety issues; identify potential construction-related traffic impacts; assess the Project's long-term operational impacts associated with cannabis-related development; evaluate the Project's cumulative effects to traffic and transportation based on regional development trends; and identify feasible mitigation options to address significant impacts.

4.2.13 Public Utilities

The Project would increase demand for water and power to support cannabis activities and may generate wastewater requiring treatment and solid waste requiring landfill disposal. While many cultivation sites are anticipated to be rural and served by wells, indoor cultivation is likely to require municipal water sources and use of existing infrastructure. In accordance with CEQA Guidelines, Appendix F: Energy Conservation, the EIR would investigate the energy availability and demand associated with commercial-scale cannabis cultivation and manufacturing, including energy diversity and options for alternative energy sources; describe the capacity of existing systems that would serve cultivation sites, including water, wastewater, solid waste, and energy systems; identify impacts from cannabis cultivation sites upon the existing utility system and services and operation-related impacts from existing and new cultivation sites related to the increase in demand for utility services and increase in waste associated with cultivation; assess energy impacts consistent with Appendix F of the CEQA Guidelines; describe cumulative impacts associated with proposed projects in the vicinity; and identify potential mitigation measures as needed to address impacts.

4.2.14 Cumulative Impacts

Pursuant to CEQA Guidelines Section 15130, the EIR shall discuss the cumulative impacts of the Project when the Project's incremental contribution to a significant cumulative impact is considered to be "cumulatively considerable." A cumulative impact consists of an impact that is created as a result of the combination of the proposed Project together with other projects causing related impacts.

The EIR will assess the potential cumulative impacts in each environmental topical section. The EIR will describe buildout impacts of the Project's land uses considered along with development of reasonably foreseeable (proposed and approved, not yet built) projects in the area.

4.3 Alternatives Analysis

The EIR will describe a reasonable range of alternatives to the Project that would feasibly attain most of the basic objectives of the Project but would avoid or substantially lessen any of the significant effects of the Project, as required by CEQA Guidelines Section 15126.6. The alternatives discussion in the EIR will include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Project. The EIR will programmatically describe the major characteristics and significant environmental effects of each alternative. The EIR analysis will also include a brief discussion of each alternative considered, but rejected from further analysis in the EIR, if any, as suggested by CEQA Guidelines Section 15126.6.

4.4 Other CEQA Required Discussions

The EIR will include a section that addresses other issues for which CEQA Guidelines Section 15126 requires analysis beyond the environmental topical areas described above. In this section, the EIR will analyze the additional possible impacts of the proposed Project including growth inducement and significant irreversible environmental changes.

Attachments: Attachment A, Santa Barbara County Land Use & Development Code
Draft Cannabis Land Use Ordinance

INDEX TO NOP COMMENTS

Appendix A includes a copy of the Notice of Preparation (NOP) for the proposed Commercial Cultivation of Medical Cannabis Regulations and Licensing Program (Project), copies of all comment letters received on the NOP during the public comment period, and an indication (Section or sub-Section) where each individual comment is addressed in the Draft EIR. **Table A-1** lists all comments and shows the comment set identification number for each letter or commenter. **Table A-2** identifies the location where each individual comment is addressed in the Draft EIR.

Table A-1. Commenters on The Notice of Preparation

Individual/Agency/Affiliation	Format of Comment	Date Comment Received	NOP Comment Set	NOP Comment No.
Adrian	Email	7/20/2017	1	1
Alison Mastri (1)	Email	8/10/2017	2	1
Alison Mastri (2)	Email	8/11/2017	3	1-4
Alison Mastri (3)	Email	8/11/2017	4	1-5
Allan Weil	Email	8/11/2017	5	1-4
Alyssa & Barak Moffitt	Email	7/26/17	6	1-15
Andrew Hazi	Email	8/11/2017	7	1-3
Barbara Kloos (1)	Email	7/20/17	8	1
Barbara Kloos (2)	Email	8/11/2017	9	1
Barbara Widmer	Email	8/11/2017	10	1-2
Bob Brown	Letter	7/31/2017	11	1
Bob Jordan	Email	8/6/17	12	1
Bonnie Freeman	Email	8/11/2017	13	1
Bonnie Muench (1)	Email	8/8/17	14	1-2
Bonnie Muench (2)	Email	8/10/2017	15	1
Bruce Watkins	Email	7/28/2017	16	1
California Department of Fish and Wildlife	Email	8/10/2017	17	1-5
California Department Transportation	Email	8/10/2017	18	1
California Strategies, LLC	Email	42958	19	1-2
Carl William Hein	Email	8/11/2017	20	1
Carpinteria Unified School District	Email	8/11/2017	21	1
Carpinteria Valley Association	Email	8/7/17	22	1
Cathleen McIsaac Bowman	Email	8/6/17	23	1-3
Cecelia Brown	Email	8/11/2017	24	1-10
Chernis Law Group P.C.	Email	8/11/2017	25	1
Cheryl Mrachek	Email	8/1/2017	26	1

Appendix A

Individual/Agency/Affiliation	Format of Comment	Date Comment Received	NOP Comment Set	NOP Comment No.
City of Carpinteria	Email	8/10/2017	27	1-21
City of Santa Barbara	Email	8/10/2017	28	1-2
Craig Bittner	Email	8/9/2017	29	1
Dave and Lillian Clary	Email	8/11/2017	30	1-3
David Kloos	Email	8/10/2017	31	1-3
Dennis LaLumandiere	Email	8/2/17	32	1-4
Derek McLeish and Susan Ashbrook	Letter	8/3/17	33	1-2
Diane Cook	Email	8/11/2017	34	1-3
Doug Burbank	Email	8/11/2017	35	1-2
Doug McGinnis	Email	7/28/17	36	1-2
Edo McGowan	Email	7/19/17	37	1-3
Eric & Katherine Larsen	Email	8/9/2017	38	1
Gart and Kathy Nobis	Email	8/11/2017	39	1-6
Heidi Carver	Email	8/9/2017	40	1
Helen Larsen	Email	7/24/2017	41	1
HERBL Distribution Solutions	Email	8/11/2017	42	1
Hubert Leveque	Email	8/10/2017	43	1
Hunter Jameson	Email	8/8/17	44	1
Jackie Silverman	Email	7/26/17	45	1
James and Jeanne-Marie Malone	Email	8/8/2017	46	1-16
Jan Baker	Letter	8/5/17	47	1-2
Janet Booth	Email	8/8/17	48	1
Janet Kruger	Email	8/8/2017	49	1-3
Janet Shaw	Email	7/31/17	50	1-2
Jeanne Spencer	Email	8/11/2017	51	1-4
Jim & Karen Siffert	Email	7/28/17	52	1-1
Jim and Kathy Sterken	Email	8/9/2017	53	1-2
Jim Taylor	Email	8/11/2017	54	1
Joe and Janet Schuster	Email	8/10/2017	55	1-7
John Culbertson	Email	8/9/2017	56	1-9
John De Friel	Email	7/26/17	57	1
Julia Crookston	Email	7/27/17	58	1
Jansma Von	Email	8/7/17	59	1-
June Gill	Email	8/11/2017	60	1
Karen Friedman (1)	Email	8/5/2017	61	1
Karen Friedman (2)	Email	7/20/17	62	1
Karen Haddigan	Email	7/31/2017	63	1
Kathy Perrizo	Email	7/28/17	64	1

Individual/Agency/Affiliation	Format of Comment	Date Comment Received	NOP Comment Set	NOP Comment No.
Kim Miller	Email	7/28/17	65	1
Kurt Smith	Email	8/5/17	66	1-3
Kyle Wolf	Email	8/11/2017	67	1
Lee Kell	Email	8/10/2017	68	1
Leisa Cosentino	Email	8/7/2017	69	1
Leo Elovitz	Email	8/10/2017	70	1-5
Linda and Curtis Tunnell	Letter	8/11/2017	71	1-6
Linda Muzinich	Letter	8/9/2017	72	1-7
Linda Price	Email	8/10/2017	73	1
Lisa Overstreet	Email	8/11/2017	74	1
Marc Cosentino	Email	8/11/2017	75	1
Marsha Messmore	Email	8/6/17	76	1
McCloskey Nursery	Email	8/10/2017	77	1
Meg Mori	Email	8/8/2017	78	1-3
Merilly Peebles	Email	8/12/2017	79	1
Michael Holliday	Email	8/8/2017	80	1
Michael Palmer	Email	8/10/2017	81	1-4
Mollie Culver	Email	8/11/2017	82	1-7
Native American Heritage Commission, Gayle Totton	Email	7/27/2017	83	1
Patricia Hansen	Email	7/27/2017	84	1-3
Patricia Henmi	Email	8/11/2017	85	1
Patricia Kohlen	Email	8/8/2017	86	1
Patricia Ruben	Email	7/20/2017	87	1
Peggy Zachariou	Email	7/28/17	88	1-2
Rachel Amundsen	Email	7/24/17	89	1
Randy Jones	Email	7/27/17	90	1
Riva and Kevin McLernon	Email	8/9/2017	91	1-2
Robert Lilley	Email	8/11/2017	92	1
Roxanne Lapidus	Email	7/25/2017	93	1-7
Russell R. Ruiz	Email	8/10/2017	94	1-5
Sandy Mezzio	Email	7/25/17	95	1
Santa Barbara Channelkeeper	Email	8/11/2017	96	1-3
Sara Rotman	Email	8/10/2017	97	1-3
Santa Barbara Air Pollution Control District	Email	8/10/2017	98	1-4
Sheryl Robinson	Letter	8/10/2017	99	1-2
Susan Murphy	Email	8/11/2017	100	1-7
Thomas and Charmaine Rogers	Email	8/8/17	101	1-3

Appendix A

Individual/Agency/Affiliation	Format of Comment	Date Comment Received	NOP Comment Set	NOP Comment No.
Tim Mossholder	Email	8/11/2017	102	1-2
Todd and Rosa Booth	Email	7/31/17	103	1
Tom and Denise Peterson	Letter	8/9/2017	104	1-11
Unknown Letter	Letter	8/9/2017	105	1-3
Valerie Bentz	Email	7/26/17	106	1-2
Vicky Lorelli	Email	7/31/2017	107	1-2
William T. Potts	Email	7/29/2017	108	1

Table A-2. Responses to the NOP Comments

Comment #	Responses
Comment Received from Adrian by Email	
1	Thank you for your comment. Please refer to Section 2.3.3, <i>Summary of Proposed Project</i> , in Chapter 2, <i>Project Description</i> , for a summary of permitted license types and associated cannabis activities applicable to the Project, as well as a list of the allowed license types by zone district. Also, see Tables 2-3 and 2-4. Final approval of licenses and zoning will be made by the County Board of Supervisors, with recommendation from the Planning Commission and subsequent action by the California Coastal Commission.
Comment Received from Alison Mastri by Email (1)	
2-1	Thank you for your comment. However, this comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the California Environmental Quality Act. Your comment will be considered by decision makers in the review process of the proposed Project.
Comment Received from Alison Mastri by Email (2)	
3-1	Thank you for your comment. Please refer to Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , which discusses air quality related health issues. For land use and zoning concerns please refer to Section 3.9, <i>Land Use and Planning</i> and Chapter 2, <i>Project Description</i> . Since the EIR does not evaluate economic impacts, only environmental impacts, the decision makers will review comments related to the project merits and economics.
3-2	Thank you for your comment. Please refer to Section 3.7, <i>Hazards and Hazardous Materials</i> , Section 3.8, <i>Hydrology and Water Resources</i> , and Section 3.4, <i>Biological Resources</i> , which discuss impacts associated with use of fertilizers and pesticides, water quality, water tables, and plant life.
3-3	Thank you for your comment. Please refer to Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , which discusses air quality related health issues.
3-4	Thank you for your comment. Please refer to Section 3.13, <i>Utilities and Energy Conservation</i> , for information on water availability in the County and water usage of the Project. See also Section 3.2 <i>Agriculture Resources</i> .
Comment Received from Alison Mastri by Email (3)	
4-1	Thank you for your comment. Please refer to Section 3.1, <i>Aesthetics and Visual Resources</i> , for a discussion on lighting and glare as well as mitigation measures to reduce issues related to lighting and glare. Also, refer to Section 3.4, <i>Biological Resources</i> , for a discussion on the impacts on wildlife.
4-2	Thank you for your comment. Please refer to Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , for an analysis and discussion of the Project's air quality impacts.
4-3	Thank you for your comment. Please refer to Section 3.7, <i>Hazards and Hazardous Materials</i> , Section 3.8, <i>Hydrology and Water Resources</i> , and Section 3.4 <i>Biological Resources</i> which discuss hazardous materials, water quality, and plant life.
4-4	Thank you for your comment. Refer to Section 3.11, <i>Public Services</i> , which discusses impacts associated with public safety and effects on law enforcement services.
4-5	Thank you for your comment. Please refer to Section 3.9, <i>Land Use and Planning</i> , and Section 3.2, <i>Agricultural Resources</i> , as they discuss zoning and allowed agricultural

Table A-2. Responses to the NOP Comments

Comment #	Responses
	uses. Your comment will be considered by decision makers in the review process of the Project.
Comment Received from Allan Weil by Email	
5-1	Thank you for your comment. Please refer to Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , which addresses odor issues related to cannabis.
5-2	Thank you for your comment. Since the EIR does not evaluate impairment impacts, only environmental impacts, the decision makers will review comments related to your concerns about driving under the influence of cannabis.
5-3	Section 3.1, <i>Aesthetics and Visual Resources</i> addresses the Project's impact to night lighting. Section 3.4, <i>Biological Resources</i> , addresses impacts on sensitive biological resources, including wildlife. Chapter 4, <i>Alternatives Analysis</i> , identified and analyzes alternatives to the proposed Project which may reduce environmental impacts of the Project, including impacts from night lighting.
5-4	Since the EIR does not evaluate economic impacts, only environmental impacts, the decision makers will review comments related to your concerns about economic impacts.
Comment Received from Alyssa and Barak Moffitt by Email	
6-1	Thank you for your comments. Please refer to Section 3.13, <i>Utilities and Energy Conservation</i> and Section 3.8, <i>Hydrology and Water Resources</i> , which address water quality, water supply and availability, and demand for water supplies under the Project.
6-2	Please refer to Section 3.4, <i>Biological Resources</i> , which addresses impacts to biological resources, including sensitive plants and wildlife, from the use of agricultural chemical.
6-3	Please refer to Section 3.4, <i>Biological Resources</i> , with addresses impacts to sensitive biological resources, including special status plant or wildlife species.
6-4	Please refer to Section 3.4, <i>Biological Resources</i> , which addresses impacts associated with the potential clearing and removal of trees, as well as impacts to other important biological resources.
6-5	Section 3.8, <i>Hydrology and Water Resources</i> , addresses potential impacts to water quality, runoff, flood and drainage, and groundwater recharge related to the Project. Please refer to Section 3.4, <i>Biological Resources</i> , with addresses impacts to sensitive biological resources, including special status plant or wildlife species.
6-6	Thank you for your comments. Please refer to Section 3.13, <i>Utilities and Energy Conservation</i> and Section 3.8, <i>Hydrology and Water Resources</i> , which address water quality, water supply and availability, and demand for water supplies under the Project.
6-7	Please refer to Section 3.4, <i>Biological Resources</i> , with addresses impacts to sensitive biological resources, including special status plant or wildlife species, their habitat, and migratory corridors.
6-8	Section 3.1, <i>Aesthetics and Visual Resources</i> , for information on the impacts and considerations of Santa Barbara County Scenic Highways and what is considered to have scenic value.
6-9	Please refer to Section 3.12, <i>Transportation and Traffic</i> for impacts concerning traffic. Please refer to section 3.11, <i>Public Services</i> for analysis of emergency services and the Project's impact on emergency services.

Table A-2. Responses to the NOP Comments

Comment #	Responses
6-10	Section 3.11, <i>Public Services</i> , provides discussion and analysis of impacts associated with security and demand for law enforcement services.
6-11	Section 3.1, <i>Aesthetics and Visual Resources</i> , analyzes the potential impact of lighting and glare which may result from operation of cannabis sites under the Project.
6-12	Please refer to Chapter 5, <i>Other CEQA</i> , which discusses impacts associated with potential continued and future operation of unlicensed cannabis operations.
6-13	Please refer to Section 3.10, <i>Noise</i> and Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , which address your noise and air pollution concerns related to the use of portable diesel and gasoline generators.
6-14	Section 3.2, <i>Agricultural resources</i> , analyzes agricultural concerns related to cannabis cultivation and compatibility with existing agricultural resources. Refer to Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , which addresses impacts related to odors.
6-15	Since the EIR does not evaluate legal issues, only environmental impacts. Your comment will be considered by decision makers in the review process of the Project.
Comment Received from Andrew Hazi by Email	
7-1	Thank you for your comments. Water availability and water use impacts as a result of the Project are addressed in Section 3.8, <i>Hydrology and Water Resources</i> , and Section 3.13, <i>Utilities and Energy Conservation</i> .
7-2	Please refer to Section 3.7, <i>Hazards and Hazardous Materials</i> , Section 3.8, <i>Hydrology and Water Resources</i> , and Section 3.4 <i>Biological Resources</i> which address the Project's impacts related to pesticides, rodenticides, and fertilizers.
7-3	Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , and Section 3.10, <i>Noise</i> , analyze impacts related to carbon emissions and noise pollution. Section 3.1, <i>Aesthetics and Visual Resources</i> addresses impacts due to lighting and glare.
Comment Received from Barbara Kloos by Email (1)	
8-1	Thank you for your comment. Please refer to Section 3.9, <i>Land Use and Planning</i> , which addresses land use and zoning impacts related to the Project. Your comments will be considered by decisions makers.
Comment Received from Barbara Kloos by Email (2)	
9-1	Thank you for your comment. Since these comments do not refer to environmental issues, they are not addressed in the EIR, but will otherwise be considered by decision makers.
Comment Received from Barbara Widmer by Email	
10-1	Thank you for your comment. Since these comments do not refer to environmental issues, they are not addressed in the EIR, but will otherwise be considered by decision makers.
10-2	Please see Section 3.1, <i>Aesthetics and Visual Resources</i> , which analyzes visual impacts, Section 3.11, <i>Public Services</i> , which addresses the Project's impact to police and law enforcement services and Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , which addresses impacts related to odor. Economic impacts are not considered under CEQA and are therefore not discussed in the EIR. However, all your comments will be considered by decision makers in the review process.

Table A-2. Responses to the NOP Comments

Comment #	Responses
Handwritten Comment Received from Bob Brown by Mail	
11-1	Thank you for your comment. Since these comments do not refer to environmental issues, they are not addressed in the EIR, but will otherwise be considered by decision makers.
Comment Received from Bob Jordan by Email	
12-1	Thank you for your comment. Please refer to Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , which addresses odor issues related to the Project. Your comments will be considered by decision makers in the review process.
Comment Received Bonnie Freeman from by Email	
13-1	Thank you for your comment. Section 3.9, <i>Land Use and Planning</i> , analyses impacts associated with zoning and land use compatibility. Section 3.11, <i>Public Services</i> , addresses parks and public facilities. Section 3.10, <i>Noise</i> , addresses noise related impacts. Section 3.13, <i>Utilities and Energy Conservation</i> , addresses impacts related to demand for energy resources, and Section 3.1, <i>Aesthetics and Visual Resources</i> , addresses lighting related impacts. Your comment will be considered by decision makers during the review process.
Comment Received from Bonnie Muench by Email (1)	
14-1	Thank you for your comments. Sensitive receptors, such as schools, as well as necessary setback requirements are considered in Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , Section 3.10, <i>Noise</i> , and Section 3.1, <i>Aesthetics and Visual Resources</i> .
14-2	Please refer to Section 3.7, <i>Hazards and Hazardous Materials</i> , and Section 3.8, <i>Hydrology and Water Resources</i> , which analyze potential hazardous materials such as fertilizers and the impacts on water quality respectively. See Section 3.11, <i>Public Services</i> , for impacts to law enforcement and emergency services. Section 3.12, <i>Transportation and Traffic</i> , discusses traffic impacts related to the Project and Section 3.1 <i>Aesthetics and Visual Resources</i> , which addresses visual impacts. Your comments will be considered by decision makers in the review process.
Comment Received from Bonnie Muench by Email (2)	
15-1	Thank you for your comment. Since these comments do not refer to environmental issues, they are not addressed in the EIR, but will otherwise be considered by decision makers.
Comment Received from Bruce Watkins by Email	
16-1	Thank you for your comment. Your comments and the information received as part of the email comment submittal will be considered by decision makers in the review process of the Project.
Comment Received from California Department of Fish and Wildlife by Email	
17-1	Thank you for your comment. Chapter 2, <i>Project Description</i> , addresses Project activities in detail. Section 3.4, <i>Biological Resources</i> , addresses the biological environmental setting for the Project, the Project's impacts and cumulative impacts on biological resources, and associated mitigation measures, as well as the Project's regulatory setting in regards to biological resources, and required permits. Section 3.7,

Table A-2. Responses to the NOP Comments

Comment #	Responses
	<i>Hazards and Hazardous Materials</i> , address the issue of pesticides in relation to the Project.
17-2	Section 3.8, <i>Hydrology and Water Resources</i> , analyzes the Project's impact on surface and groundwater availability, supply and recharge.
17-3	Thank you for your comment. The necessity for agency permits shall be determined by County staff during the licensing application review processes. All agency permits required for an individual site would be determined by County staff and acquired by an applicant prior to approval of a license.
17-4	Section 3.8, <i>Hydrology and Water Resources</i> , addresses potential impacts to water quality, runoff, flood and drainage, and groundwater recharge related to the Project.
17-5	Please refer to Section 3.4, <i>Biological Resources</i> , which identify impacts to biological resources, including sensitive, threatened, and/or endangered plant and wildlife species, nesting birds, sensitive or unique habitat, migratory corridors, wetland resources, etc. This analysis includes identification of mitigation measures which would be necessary to reduce Project impacts to the maximum extent feasible.
Comment Received from California Department Transportation by Email	
18-1	Thank you for your comment. Please refer to Section 3.12, <i>Transportation and Traffic</i> , for transportation and traffic related impacts and mitigation measures associated with the Project.
Comment Received from California Strategies, LLC by Email	
19-1	Thank you for your comment. Please refer to Chapter 2, <i>Project Description</i> , for a discussion on required setbacks under the Project.
19-2	Thank you for your comment. Since these comments do not refer to environmental issues, they are not addressed in the EIR, but will otherwise be considered by decision makers.
Comment Received from Carl William Hein by Email	
20-1	Thank you for your comment. Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , analyzes air quality impacts of the Project. Your comments will be considered by decision makers during the review process.
Comment Received from Carpinteria Unified School District by Email	
21-1	Thank you for your comment. Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , analyzes odor related impacts. Your comments will be considered by decision makers in the review process.
Comment Received from Carpinteria Valley Association by Email	
22-1	Thank you for your comment. Please refer to section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , which analyzes odor related impacts. Your comments will be considered by decision makers in the review process.
Comment Received from Cathleen McIsaac Bowman by Email	
23-1	Thank you for your comment. Please refer to section 3.11, <i>Public Services</i> , and Chapter 2, <i>Project Description</i> , which address law enforcement and related impacts.

Table A-2. Responses to the NOP Comments

Comment #	Responses
23-2	Section 3.8, <i>Hydrology and Water Resources</i> , and Section 3.13, <i>Utilities and Energy Conservation</i> , analyze water availability and water use impacts related to the Project. Section 3.7, <i>Hazards and Hazardous Materials</i> , addresses impacts related to pesticides, herbicides, and rodenticides. Section 3.4, <i>Biological Resources</i> , addresses impacts to wildlife from these chemicals. Your comments will be considered by decision makers in the review process.
23-3	Please refer to Section 3.11, <i>Public Services</i> , for an analysis of the county's ability to respond to unpermitted or illegal activity related to this Project.
Comment Received from Cecelia Brown by Email	
24-1	Thank you for your comments. Please see Section 3.1, <i>Aesthetics and Visual Resources</i> , which addresses lighting, scenic highways, and aesthetics related to fencing. Section 3.9, <i>Land Use and Planning</i> , provides development standards related to fencing and Section 3.4, <i>Biological Resources</i> , addresses impacts related to fencing and wildlife corridors.
24-2	Please refer to Section 3.2 <i>Agricultural Resources</i> , for a discussion of how multiple leases will be addressed.
24-3	Please refer to Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , which analyzes odor related impacts
24-4	Please refer to section 3.5, <i>Cultural Resources</i> , and Section 3.1, <i>Aesthetics and Visual Resources</i> , for a discussion of the impacts related to cultural and visual resources.
24-5	Section 3.7, <i>Hazards and Hazardous Materials</i> , addresses impacts related to fire hazards and hazardous waste.
24-6	Please refer to Chapter 2, <i>Project Description</i> , and Section 3.9, <i>Land Use and Planning</i> , for a discussion on the zoning allowances of the Project, and other land use related concerns including parking. In addition, please refer to Section 3.12, <i>Transportation and Traffic</i> , for traffic related impacts.
24-7	Section 3.11, <i>Public Services</i> , analyze police services and Project related impacts.
24-8	Section 3.7, <i>Hazards and Hazardous Materials</i> , addresses impacts related to hazardous wastes generated by cannabis activities, and Section 3.14, <i>Utilities and Energy Conservation</i> , address impacts associated with demand for waste disposal services.
24-9	Chapter 2, <i>Project Description</i> , addresses required buffers under the Project. Your comments will be considered by decision makers during the review process.
24-10	Please see Section 3.1, <i>Aesthetics and Visual Resources</i> which addresses impacts to aesthetic and visual resources, including scenic highways within the County.
Comment Received from Chernis Law Group P.C. by Email	
25-1	Thank you for your comment. Please refer to Chapter 2, <i>Project Description</i> , for a discussion on the proposed Cannabis Licensing Program and permitting process. Your comments will be considered by decision makers during the review process.
Comment Received from Cheryl Mrachek by Email	
26-1	Thank you for your comment. Please refer to Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , which analyzes odor and health related air quality impacts Your comment will be considered by decision makers in the review process of the Project.

Table A-2. Responses to the NOP Comments

Comment #	Responses
Comment Received from City of Carpinteria by Email	
27-1	Thank you for your comment. Please refer to and Section 3.9, <i>Land Use and Planning</i> , for Project consistency with Carpinteria Valley Greenhouse Program and General Plan/Coastal Plan Objective LU-4 and Policies LU-4a, -4b, -4c. Chapter 4, <i>Alternatives Analysis</i> , includes consideration and analysis of a range of alternatives designed to have the effect of resulting in potentially less severe impacts than the proposed Project, and provides brief comparative analysis of the alternative's impact with regards to the resources analyzed in Chapter 3, <i>Environmental Impact Analysis</i> , of the EIR.
27-2	Please refer to Chapter 2, <i>Project Description</i> , addresses and describes the proposed permitting requirements for cannabis land uses by eligible zone, as well as includes discussion of cannabis activities as they relate to traditional agricultural practices and processes permitted within the County. See also Chapter 4, <i>Alternatives Analysis</i> , which includes discussion and consideration of a number of Project alternatives related to providing greater restrictions or allowances for cannabis activities.
27-3	Please refer to Chapter 2, <i>Project Description</i> , addresses and describes the proposed permitting requirements for cannabis manufacturing and processing uses by eligible zone, as well as includes discussion of cannabis activities as they relate to traditional agricultural practices and processes permitted within the County. With regard to impacts from employee traffic and truck trips, Section 3.12, <i>Transportation and Traffic</i> , describes the Project's potential to result in changes in the transportation environment from the permitting of cannabis uses in eligible zone districts. See also Chapter 4, <i>Alternatives Analysis</i> , which includes discussion and consideration of a number of Project alternatives related to providing greater restrictions or allowances for cannabis activities.
27-4	Please refer to Chapter 5, <i>Other CEQA</i> , for impacts related to employment, population growth and housing impacts.
27-5	Section 3.9, <i>Land Use and Planning</i> , addresses land use impacts. Section 3.12, <i>Transportation and Traffic</i> , addresses Project related traffic impacts. Section 3.11, <i>Public Services</i> , discusses public safety and Sections 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , 3.4, <i>Biological Resources</i> , 3.6, <i>Geology and Soils</i> , 3.8, <i>Hydrology and Water Resources</i> , address environmental effects.
27-6	Please refer to Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , for concerns related to odor. Section 3.10, <i>Noise</i> , for noise related impacts. Sections 3.1, <i>Aesthetics and Visual Resources</i> , for lighting related impacts. Chapter 4, <i>Alternatives Analysis</i> , includes consideration and analysis of a range of alternatives designed to have the effect of resulting in potentially less severe impacts than the proposed Project, and provides brief comparative analysis of the alternative's impact with regards to the resources analyzed in Chapter 3, <i>Environmental Impact Analysis</i> , of the EIR.
27-7	Please refer to and Section 3.9, <i>Land Use and Planning</i> , and Section 3.2, <i>Agricultural Resources</i> , for discussion of cannabis growth in the coastal zone. Chapter 4, <i>Alternatives Analysis</i> , includes consideration and analysis of a range of alternatives designed to have the effect of resulting in potentially less severe impacts than the proposed Project, and provides brief comparative analysis of the alternative's impact with regards to the resources analyzed in Chapter 3, <i>Environmental Impact Analysis</i> , of the EIR.

Table A-2. Responses to the NOP Comments

Comment #	Responses
27-8	Thank you for your comment. Since these comments do not refer to environmental issues, they are not addressed in the EIR, but will otherwise be considered by decision makers.
27-9	Please refer to Section 3.12, <i>Transportation and Traffic</i> , which addresses Project related traffic impacts. Chapter 4, <i>Alternatives Analysis</i> , includes consideration and analysis of a range of alternatives designed to have the effect of resulting in potentially less severe impacts than the proposed Project, and provides brief comparative analysis of the alternative's impact with regards to the resources analyzed in Chapter 3, <i>Environmental Impact Analysis</i> , of the EIR.
27-10	Please refer to Section 3.12, <i>Transportation and Traffic</i> , which addresses Project related traffic impacts, including demand for public transit and other alternative modes of transportation. Chapter 4, <i>Alternatives Analysis</i> , includes consideration and analysis of a range of alternatives designed to have the effect of resulting in potentially less severe impacts than the proposed Project, and provides brief comparative analysis of the alternative's impact with regards to the resources analyzed in Chapter 3 of the EIR.
27-11	Section 3.12, <i>Transportation and Traffic</i> , analyzes the county's public transportation and Project related impacts.
27-12	Impacts related to lighting, fencing, visual impairment are discussed in Section 3.1, <i>Aesthetics and Visual Resources</i> . Project related setbacks and buffers are discussed in Chapter 2, <i>Project Description</i> . Chapter 4, <i>Alternatives Analysis</i> , includes consideration and analysis of a range of alternatives designed to have the effect of resulting in potentially less severe impacts than the proposed Project, and provides brief comparative analysis of the alternative's impact with regards to the resources analyzed in Chapter 3 of the EIR.
27-13	Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , analyses air quality impacts related to health and odors. Chapter 4, <i>Alternatives Analysis</i> , includes consideration and analysis of a range of alternatives designed to have the effect of resulting in potentially less severe impacts than the proposed Project, and provides brief comparative analysis of the alternative's impact with regards to the resources analyzed in Chapter 3 of the EIR.
27-14	Impacts related to pesticide, fertilizer and other chemical use are discussed in Section 3.7, <i>Hazards and Hazardous Materials</i> , and Section 3.4 <i>Biological Resources</i> .
27-15	Please refer to Section 3.10, <i>Noise</i> , for noise related impacts.
27-16	Please refer to Section 3.11, <i>Public Services</i> , for an analysis on Project related impacts to law enforcement, fire and emergency services. Chapter 4, <i>Alternatives Analysis</i> , includes consideration and analysis of a range of alternatives designed to have the effect of resulting in potentially less severe impacts than the proposed Project, and provides brief comparative analysis of the alternative's impact with regards to the resources analyzed in Chapter 3 of the EIR.
27-17	Please refer to Section 3.11, <i>Public Services</i> , for an analysis on Project related impacts to law enforcement, fire and emergency services. Chapter 4, <i>Alternatives Analysis</i> , includes consideration and analysis of a range of alternatives designed to have the effect of resulting in potentially less severe impacts than the proposed Project, and provides brief comparative analysis of the alternative's impact with regards to the resources analyzed in Chapter 3, <i>Environmental Impact Analysis</i> , of the EIR.

Table A-2. Responses to the NOP Comments

Comment #	Responses
27-18	Section 3.8, <i>Hydrology and Water Resources</i> and Section 3.13, <i>Utilities and Energy Conservation</i> address water availability and water use related to the Project. This discussion includes comparison and analysis of water demands of cannabis to traditional agricultural crops grown within the County. Where appropriate, discussion of region or area specific impacts to water supply and groundwater has been provided.
27-19	Section 3.13, <i>Utilities and Energy Conservation</i> , provides discussion on energy use related to the Project.
27-20	Section 3.8, <i>Hydrology and Water Resources</i> , addresses potential impacts to water quality, runoff, flood and drainage, and groundwater recharge related to the Project.
27-21	Biological related impacts are discussed in Section 3.4, <i>Biological Resources</i> . Additionally, fertilizer and pest-control related impacts are found in Section 3.4, <i>Biological Resources</i> , as well as in Section 3.7, <i>Hazards and Hazardous Materials</i> . Your comments will be considered by decision makers during the review process.
Comment Received from City of Santa Barbara by Email	
28-1	Thank you for your comment. Please refer to Section 3.1, <i>Aesthetics and Visual Resources</i> , for an analysis on lighting impacts. See Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , for impacts related to odor and dust. Section 3.10, <i>Noise</i> , addresses issues related to noise. Sections 3.7, <i>Hazards and Hazardous Materials</i> , and 3.4, <i>Biological Resources</i> , analyze impacts related to pesticide use and exposure.
28-2	Agriculture related impacts are discussed in Section 3.2, <i>Agricultural Resources</i> . Chapter 2, <i>Project Description</i> , provides information on setbacks. Impacts related to additional security measures related to cannabis are discussed in their associated resources areas, (i.e. security lighting impacts are analyzed in Section 3.1, <i>Aesthetics and Visual Resources</i> , etc.). Your comments will be considered by decision makers in the review process.
Comment Received from Craig Bittner by Email	
29-1	Thank you for your comment. Project related impacts due to odor, air pollution and health related air quality impacts are discussed in Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> . Your comment will be considered by decision makers in the review process of the Project.
Comment Received from Dave and Lillian Clary by Email	
30-1	Thank you for your comment. Zoning is discussed in to Section 3.9, <i>Land Use and Planning</i> and Chapter 2, <i>Project Description</i> .
30-2	Sections 3.8, <i>Hydrology and Water Resources</i> and 3.13. <i>Utilities and Energy Conservation</i> , address water availability and usage impacts related to the Project.
30-3	Section 3.11, <i>Public Services</i> , analyzes impacts to emergency services including fire and police response times. Your comments will be considered by decision makers during the Project review process.
Comment Received from Dave Kloos by Email	
31-1	Thank you for your comments. Please refer to Chapter 2, <i>Project Description</i> and Section 3.9, <i>Land Use and Planning</i> for a description of zoning.
31-2	Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , addresses issues related to odor.

Table A-2. Responses to the NOP Comments

Comment #	Responses
31-3	Thank you for your comment. Since these comments do not refer to environmental issues, they are not addressed in the EIR, but will otherwise be considered by decision makers.
Comment Received from Dennis Lalumandiere by Email	
32-1	Thank you for your comment. A discussion on zoning can be found in Section 3.9, <i>Land Use and Planning</i> and Chapter 2, <i>Project Description</i> .
32-2	Please refer to Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , which addresses issues related to odor.
32-3	Section 3.11, <i>Public Services</i> , analyzes impacts to law enforcement services related to the Project.
32-4	Thank you for your comment. Since these comments do not refer to environmental issues, they are not addressed in the EIR, but will otherwise be considered by decision makers.
Comment Card Received from Derek McLeish and Susan Ashbrook by Email	
33-1	Thank you for your comment. Please refer to Chapter 2, <i>Project Description</i> , for a detailed discussion of specific permitting and licensing requirements for cannabis activities.
33-2	Please refer to Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , which addresses issues related to odors generated by cannabis activities, as well as emissions which may be generated by cannabis activities. Section 3.1, <i>Aesthetics and Visual Resources</i> , addresses impacts associated with light pollution and standard thresholds for assessing impacts associated with light pollution. With regard to pesticides and fertilizers, impacts resulting from the use of such materials are discussed in Section 3.4, <i>Biological Resources</i> , Section 3.7, <i>Hazards and Hazardous Materials</i> , and Section 3.8, <i>Hydrology and Water Resources</i> .
Comments Received from Diane Cook by Email	
34-1	Thank you for your comment. A discussion on zoning can be found in Section 3.9, <i>Land Use and Planning</i> and Chapter 2, <i>Project Description</i> .
34-2	Please refer to Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , which addresses issues related to odors generated by cannabis activities, as well as emissions which may be generated by cannabis activities. Refer to Section 3.10, <i>Noise</i> , which provides discussion of impacts associated with noise generated by cannabis activities and associated equipment. Refer to Section 3.11, <i>Public Services</i> , which discusses impacts associated with public safety and effects on law enforcement services.
34-3	Thank you for your comment. Since these comments do not refer to environmental issues, they are not addressed in the EIR, but will otherwise be considered by decision makers.
Comments Received from Doug Burbank by Email	
35-1	Thank you for your comment. A discussion on zoning can be found in Section 3.9, <i>Land Use and Planning</i> and Chapter 2, <i>Project Description</i> . With regard to impacts to neighborhoods, schools, and air quality, impacts are described in appropriate sections of the EIR. See Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , Section 3.9,

Table A-2. Responses to the NOP Comments

Comment #	Responses
	<i>Land Use and Planning</i> , Section 3.10, <i>Noise</i> , Section 3.11, <i>Public Services</i> , and Section 3.12, <i>Transportation and Traffic</i> .
35-2	Thank you for your comment. Since these comments do not refer to environmental issues, they are not addressed in the EIR, but will otherwise be considered by decision makers.
Comments Received from Doug McGinnis by Email	
36-1	Thank you for your comments. Impacts related to cannabis odors are discussed and analyzed in Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> .
36-2	Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , address the Project's impacts on air quality. Section 3.13, <i>Utilities and Energy Conservation</i> , addresses the Project's impact on water use. Section 3.11, <i>Public Services</i> , addresses impacts associated with public safety and effects on law enforcement services. Regarding population and housing impacts of the Project, impacts are considered in Chapter 5, <i>Other CEQA</i> .
Comments Received from Edo McGowan by Email	
37-1	Thank you for your comments. Refer to Section 3.8, <i>Hydrology and Water Resources</i> , for discussion of the Project's impacts on water quality, particularly related to the potential for use of pesticides, insecticides, fertilizers, and other agricultural chemicals.
37-2	Section 3.8, <i>Hydrology and Water Quality</i> , describes the regulatory setting for the Project, including governing regulatory agencies and applicable policies and programs related to water quality. This section also describes impacts related to groundwater resources.
37-3	Thank you for your comment. Since these comments do not refer to environmental issues, they are not addressed in the EIR, but will otherwise be considered by decision makers.
Comments Received from Eric and Katharine Larsen by Letter	
38-1	Thank you for your comment. For discussion of impacts related to zoning and land use compatibility, see Section 3.9, <i>Land Use and Planning</i> .
Comments Received from Garth and Kathy Nobis by Email	
39-1	Thank you for your comment. Since these comments do not refer to environmental issues, they are not addressed in the EIR, but will otherwise be considered by decision makers.
39-2	Refer to Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , which describes the Project potential impacts associated with odors from cannabis activities.
39-3	Refer to Section 3.13, <i>Utilities and Energy Conservation</i> , for discussion of supply and demand for utility services which include electricity and water supplies and services.
39-4	Thank you for your comment. Since these comments do not refer to environmental issues, they are not addressed in the EIR, but will otherwise be considered by decision makers.
39-5	Thank you for your comment. Since these comments do not refer to environmental issues, they are not addressed in the EIR, but will otherwise be considered by decision makers.

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Comment #	Responses
39-6	Thank you for your comment. Since these comments do not refer to environmental issues, they are not addressed in the EIR, but will otherwise be considered by decision makers.
Comments Received from Heidi Carver by Email	
40-1	Thank you for your comments. Since these comments do not refer to environmental issues, they are not addressed in the EIR, but will otherwise be considered by decision makers.
Comments Received from Helen Larsen by Email	
41-1	Thank you for your comments. Since these comments do not refer to environmental issues, they are not addressed in the EIR, but will otherwise be considered by decision makers.
Comments Received from HERBL Distribution Solutions by Letter	
42-1	Thank you for your comments. Since these comments do not refer to environmental issues, they are not addressed in the EIR, but will otherwise be considered by decision makers.
Comments Received from Hubert Leveque by Email	
43-1	Thank you for your comments. Chapter 2, <i>Project Description</i> , addresses required buffers under the Project. Your comments will be considered by decision makers during the review process. For discussion of impacts related to odors and noxious fumes, see Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> .
Comments Received from Hunter Jameson by Email	
44-1	Thank you for your comments. Since these comments do not refer to environmental issues, they are not addressed in the EIR, but will otherwise be considered by decision makers.
Comments Received from Jackie Silverman by Email	
45-1	Thank you for your comments. Since these comments do not refer to environmental issues, they are not addressed in the EIR, but will otherwise be considered by decision makers.
Comments Received from James and Jeanne-Marie Malone by Letter	
46-1	Thank you for your comments. Refer to Section 3.8, <i>Hydrology and Water Resources</i> , for discussion of impacts associated with the quality of surface and groundwater resources.
46-2	Thank you for your comments. Since these comments do not refer to environmental issues, they are not addressed in the EIR, but will otherwise be considered by decision makers.
46-3	Section 3.13, <i>Utilities and Energy Conservation</i> , provides discussion of impacts associated with potential increases in demand for electricity and energy resources.
46-4	Section 3.11, <i>Public Services</i> , addresses impacts associated with safety of the public and law enforcement services. Chapter 5, <i>Other CEQA</i> , discusses impacts associated with potential continued and future operation of unlicensed cannabis operations.

Table A-2. Responses to the NOP Comments

Comment #	Responses
46-5	Section 3.13, <i>Utilities and Energy Conservation</i> , provides discussion of impacts associated with potential increases in demand for water supplies.
46-6	Thank you for your comments. Since these comments do not refer to environmental issues, they are not addressed in the EIR, but will otherwise be considered by decision makers.
46-7	Chapter 2, <i>Project Description</i> , and proposed amendments to County codes which are included as Appendix B of the EIR describe proposed licensing and permitting requirements for cannabis activities.
46-8	Thank you for your comments. Since these comments do not refer to environmental issues, they are not addressed in the EIR, but will otherwise be considered by decision makers.
46-9	Section 3.11, <i>Public Services</i> , addresses impacts associated with safety of the public and law enforcement services.
46-10	Section 3.12, <i>Transportation and Traffic</i> , addresses impacts associated with changes in traffic and the safety of the transportation network. Potential increases in the use of vehicles and associated emissions are described in Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> .
46-11	Thank you for your comments. Since these comments do not refer to environmental issues, they are not addressed in the EIR, but will otherwise be considered by decision makers.
46-12	Thank you for your comments. Since these comments do not refer to environmental issues, they are not addressed in the EIR, but will otherwise be considered by decision makers.
46-13	Thank you for your comments. Since these comments do not refer to environmental issues, they are not addressed in the EIR, but will otherwise be considered by decision makers.
46-14	Thank you for your comments. Section 3.11, <i>Public Services</i> , addresses impacts associated with safety of the public and law enforcement services.
46-15	Thank you for your comments. Since these comments do not refer to environmental issues, but will otherwise be considered by decision makers.
46-16	Thank you for your comment. Discussion of operation of unlicensed and unpermitted that may result from the Project is provided in Chapter 5, <i>Other CEQA</i> .
Comments Received from Jan Baker by Letter	
47-1	Thank you for your comment. A discussion on zoning can be found in Section 3.9, <i>Land Use and Planning</i> and Chapter 2, <i>Project Description</i> .
47-2	Thank you for your comments. Refer to Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , for discussion of impacts related to odors.
Comments Received from Janet Booth by Email	
48-1	Thank you for your comments. Chapter 2, <i>Project Description</i> , addresses required buffers under the Project. Refer to Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , for discussion of impacts related to odors. Refer to Section 3.1, <i>Aesthetics and Visual Resources</i> , for discussion of impacts relating to fencing requirements and effects on visual resources.

Table A-2. Responses to the NOP Comments

Comment #	Responses
Comments Received from Janet Kruger by Email	
49-1	Thank you for your comments. A discussion on zoning can be found in Section 3.9, <i>Land Use and Planning</i> and Chapter 2, <i>Project Description</i> .
49-2	Thank you for your comments. Refer to Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , for discussion of impacts related to odors.
49-3	Thank you for your comments. With regard to impacts to neighborhoods, schools, and air quality, impacts are described in appropriate sections of the EIR. See Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , Section 3.9, <i>Land Use and Planning</i> , Section 3.10, <i>Noise</i> , Section 3.11, <i>Public Services</i> , and Section 3.12, <i>Transportation and Traffic</i> .
Comments Received from Janet Shaw by Email	
50-1	Thank you for your comments. Since these comments do not refer to environmental issues, but will otherwise be considered by decision makers.
50-2	Thank you for your comments. Refer to Section 3.13, <i>Utilities and Energy Conservation</i> , for discussion of cannabis water demands and comparison to water demands of traditional agricultural products. For discussion of impacts relating to security, safety, and law enforcement services, refer to Section 3.11, <i>Public Services</i> .
Comments Received from Jeanne Spencer by Email	
51-1	Thank you for your comment. Please refer to Chapter 2, <i>Project Description</i> , and Section 3.9, <i>Land Use and Planning</i> , for a discussion on the land use and zoning allowances of the Project.
51-2	Project related setbacks and buffers to sensitive receptors are discussed in Chapter 2, <i>Project Description</i> .
51-3	Thank you for your comment. However, this comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of CEQA. Your comment will be considered by decision makers in the review process of the proposed Project.
51-4	Thank you for your comment. However, this comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of CEQA. Your comment will be considered by decision makers in the review process of the proposed Project.
Comments Received from Jim and Karen Siffert by Email	
52-1	Thank you for your comment. However, this comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of CEQA. Your comment will be considered by decision makers in the review process of the proposed Project.
Comments Received from Jim and Kathy Sterken by Email	
53-1	Thank you for your comment. However, this comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of CEQA. Your comment will be considered by decision makers in the review process of the proposed Project.

Table A-2. Responses to the NOP Comments

Comment #	Responses
53-2	Thank you for your comment. Refer to Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , for discussion of impacts related to odors. Section 3.11, <i>Public Services</i> , discusses impacts to law enforcement services.
Comments Received from Jim Taylor by Email	
54-1	Thank you for your comment. Please refer to section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , which analyzes odor related impacts. Your comments will be considered by decision makers in the review process.
Comments Received from Joe and Janet Schuster	
55-1	Thank you for your comment. However, this comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of CEQA. Your comment will be considered by decision makers in the review process of the proposed Project.
55-2	Thank you for your comment. However, this comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of CEQA. Your comment will be considered by decision makers in the review process of the proposed Project.
55-3	Thank you for your comment. However, this comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of CEQA. Your comment will be considered by decision makers in the review process of the proposed Project.
55-4	Thank you for your comment. Refer to Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , for discussion of impacts related to odors.
55-5	Please refer to Section 3.11, <i>Public Services</i> , which analyzes police services, Section 3.12, <i>Transportation and Circulation</i> , which assesses traffic impacts, and Section 3.10, <i>Noise</i> , which addresses noise related impacts.
55-6	Chapter 2, <i>Project Description</i> , and Section 3.9 <i>Land Use and Planning</i> , provide a discussion on zoning allowances related to the project.
55-7	Chapter 2, <i>Project Description</i> , and Section 3.9 <i>Land Use and Planning</i> , provide a discussion on zoning allowances related to the project. Your comments will be considered by decision makers in the review process of the proposed Project.
Comments Received from John Culbertson by Email	
56-1	Thank you for your comment. This comment does not directly pertain to the analysis conducted as part the EIR for Santa Barbara County. Your comment will be considered by decision makers in the review process of the proposed Project.
56-2	Chapter 2, <i>Project Description</i> , addresses buffers under the project. Your comments will be considered by decision makers during the review process.
56-3	Thank you for your comment. This comment does not directly pertain to the analysis conducted as part the EIR. Your comment will be considered by decision makers in the review process of the proposed Project.
56-4	Chapter 2, <i>Project Description</i> , addresses buffers under the project. Your comments will be considered by decision makers during the review process.
56-5	Chapter 2, <i>Project Description</i> , addresses buffers under the project. Your comments will be considered by decision makers during the review process.

Table A-2. Responses to the NOP Comments

Comment #	Responses
56-6	Thank you for your comment. Refer to Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , for discussion of impacts related to odors. Please refer to Section 3.1 of <i>Aesthetics and Visual Resources</i> , for a discussion on lighting and glare as well as mitigation measures to reduce issues related to lighting and glare. Also, refer to Section 3.4, <i>Biological Resources</i> , for a discussion on the impacts of lighting and glare on wildlife.
56-7	Please refer to Chapter 2, <i>Project Description</i> , and Section 3.9, <i>Land Use and Planning</i> , for a discussion on zoning and buffers under the project. Your comments will be considered by decision makers during the review process.
56-8	Air quality impacts are addressed in Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , water availability and water use impacts as a result of the Project are addressed in Section 3.8, <i>Hydrology and Water Resources</i> , and Section 3.13, <i>Utilities and Energy Conservation</i> . Impacts to public services, including law enforcement services are discussed in Section 3.11, <i>Public Services</i> . Traffic related impacts are discussed in Section 3.12, <i>Transportation and Circulation</i> .
56-9	Thank you for your comment. This comment does not directly pertain to the analysis conducted as part the EIR. Your comment will be considered by decision makers in the review process of the proposed Project.
Comments Received from John De Friel by Email	
57-1	Thank you for your comment. This comment does not directly pertain to the analysis conducted as part the EIR. Your comment will be considered by decision makers in the review process of the proposed Project.
Comments Received from Julia Crookston	
58-1	Thank you for your comment. This comment does not directly pertain to the analysis conducted as part the EIR. Your comment will be considered by decision makers in the review process of the proposed Project.
Comments Received from Jansma Von by Email	
59-1	Thank you for your comment. Please refer to Chapter 2, <i>Project Description</i> , and Section 3.9, <i>Land Use and Planning</i> , for a discussion on zoning and land use compatibility under the Project. Your comments will be considered by decision makers during the review process.
59-2	Impacts related to air quality and effects of odors from cannabis are described in Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> .
59-3	Impacts related to disposal of wastes generated by cannabis activities, including plant waste, are described in Section 3.13, <i>Utilities and Energy Conservation</i> . Impacts related to the handling, use, transportation, and disposal of chemical or hazardous wastes are described in Section 3.7, <i>Hazards and Hazardous Materials</i> .
59-4	Impacts related to light pollution, glare, and nighttime views are described in Section 3.1, <i>Aesthetics and Visual Resources</i> .
59-5	Please refer to Section 3.12, <i>Transportation and Circulation</i> , which assesses traffic impacts and Section 3.10, <i>Noise</i> , which addresses impacts from both stationary and mobile noise sources.
59-6	Please refer to Section 3.11, <i>Public Services</i> , which provides discussion and analysis of impacts associated with security and demand for law enforcement services.

Table A-2. Responses to the NOP Comments

Comment #	Responses
59-7	Thank you for your comments. Please refer to Chapter 2, <i>Project Description</i> , which addresses proposed buffer setbacks under the Project. Refer also to Section 3.9, <i>Land Use and Planning</i> , which addresses impacts associated with land use compatibility.
59-8	This EIR considers and analyzes the environmental effects of the proposed Project. Where applicable, comparative analysis of the effects of cannabis in various states and cities is provided.
Comments Received from June Gill by Email	
60-1	Please refer to Chapter 2, <i>Project Description</i> , and Section 3.9, <i>Land Use and Planning</i> , for a discussion on zoning under the Project. Your comments will be considered by decision makers during the review process.
Comments Received from Karen Friedman by Email	
61-1	Please refer to Section 3.11, <i>Public Services</i> for an analysis of the County's ability to respond to unpermitted or illegal activity related to this project. See also Chapter 5, <i>Other CEQA</i> , which addresses impacts specific to operation of unlicensed cannabis operations.
Comments Received from Karen Friedman by Email (2)	
62-1	Please refer to Section 3.7, <i>Hazards and Hazardous Materials</i> , Section 3.8, <i>Hydrology and Water Resources</i> , and Section 3.4 <i>Biological Resources</i> which address the project impacts related to chemical use. The remainder of this comment does not directly pertain to the analysis conducted as part the EIR. Your comment will be considered by decision makers in the review process of the proposed Project.
Comments Received from Karen Haddigan by Email	
63-1	Thank you for your comment. Please refer to Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , which addresses odor issues related to cannabis. Your comment will be considered by decision makers in the review process of the proposed Project.
Comments Received from Kathy Perrizo by Email	
64-1	Thank you for your comment. This comment does not directly pertain to the analysis conducted as part the EIR. Your comment will be considered by decision makers in the review process of the proposed Project.
Comments Received from Kim Miller	
65-1	Please refer to Chapter 2, <i>Project Description</i> , and Section 3.9, <i>Land Use and Planning</i> , for a discussion on zoning under the project. Your comments will be considered by decision makers during the review process.
Comments Received from Kurt Smith by Email	
66-1	Thank you for your comment. Please refer to Section 3.11, <i>Public Services</i> for an analysis of the county's ability to respond to unpermitted or illegal activity related to this project. Please see Section 3.1, <i>Aesthetics and Visual Resources</i> which addresses aesthetics related to fencing. Water availability and water use impacts as a result of the project are addressed in Section 3.8, <i>Hydrology and Water Resources</i> , and Section 3.13, <i>Utilities and Energy Conservation</i> . Section 3.11, <i>Public Services</i> provides an

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Comment #	Responses
	analysis of the county's ability to respond to unpermitted or illegal activity related to this project.
66-2	Section 3.11, <i>Public Services</i> provides an analysis of the county's ability to respond to unpermitted or illegal activity related to this project.
66-3	Thank you for your comment. This comment does not directly pertain to the analysis conducted as part the EIR. Your comment will be considered by decision makers in the review process of the proposed Project.
Comments Received from Kyle Wolf by Email	
67-1	Thank you for your comment. This comment does not directly pertain to the analysis conducted as part the EIR. Your comment will be considered by decision makers in the review process of the proposed Project.
Comments Received from Lee Kell by Email	
68-1	Thank you for your comment. Please refer to Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , which addresses odor impacts. Section 3.10, <i>Noise</i> , which discusses noise related impacts, Section 3.1, <i>Aesthetics and Visual Resources</i> , which analyzes impacts from light pollution. Section 3.11, <i>Public Services</i> provides an analysis of the county's ability to respond to unpermitted or illegal activity related to this project.
Comments Received from Leisa Cosentino by Email	
69-1	Please refer to Chapter 2, <i>Project Description</i> , and Section 3.9, <i>Land Use and Planning</i> , for a discussion on zoning under the project. Please refer to Section 3.11, <i>Transportation and Traffic</i> , which analyzes the Project's impact on traffic and Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , which addresses odor impacts.
Comments Received from Leo Elovitz by Email	
70-1	Thank you for your comment. Water availability and water use impacts as a result of the project are addressed in Section 3.8, <i>Hydrology and Water Resources</i> , and Section 3.13, <i>Utilities and Energy Conservation</i> .
70-2	Please refer to Section 3.12, <i>Transportation and Traffic</i> , for impacts concerning traffic on public roads.
70-3	Please refer to Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , which addresses odor impacts. See Section 3.1, <i>Aesthetics and Visual Resources</i> , provides an analysis of the impacts from light pollution.
70-4	Please refer to Section 3.7, <i>Hazards and Hazardous Materials</i> , Section 3.8, <i>Hydrology and Water Resources</i> , and Section 3.4 <i>Biological Resources</i> , which address the Project impacts related to pesticides, rodenticides, and fertilizers.
70-5	Please refer to Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , which addresses odor impacts. Your comments will be considered by decision makers during the review process.
Comments Received from Linda and Curtis Tunnell by Letter	
71-1	Thank you for your comment. Please refer to Section 3.6, <i>Geology and Soils</i> and Section 3.7, <i>Hazards and Hazardous Materials</i> , which analyzes the potential for landslides, slope instability, erosion, and collapsible soils.

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Comment #	Responses
71-2	Section 3.8, <i>Hydrology and Water Resources</i> and Section 3.13, <i>Utilities and Energy Conservation</i> , discuss the availability, and demand of water related to the project. In addition, Section 3.8, <i>Hydrology and Water Resources</i> , discusses stormwater flow and the related hazards.
71-3	Please see Section 3.12, <i>Transportation and Traffic</i> , for an analysis of the project impacts to traffic.
71-4	Section 3.11, <i>Public Services</i> , discusses fire services and the projects impact on the county's ability to respond to fire emergencies.
71-5	Thank you for your comment. This EIR was prepared in accordance with the rules and guidelines of CEQA. Please refer to Sections 3.4, <i>Biological Resources</i> , 3.8, <i>Hydrology and Water Resources</i> , and 3.6, <i>Geology and Soils</i> , which address resource impacts specifically in Tepusquet Canyon.
71-6	Please refer to Chapter 4, <i>Alternatives</i> , for a discussion of alternatives to the currently proposed project. Your comments will be considered by decision makers during the review process.
Comments Received from Linda Muzinich by Letter	
72-1	Thank you for your comments. Please refer to Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , which addresses odor impacts.
72-2	Please refer to Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , which addresses odor impacts. Section 3.12, <i>Transportation and Traffic</i> , for an analysis of the project impacts on traffic and Section 3.11, <i>Public Services</i> , for an analysis of the county's ability to respond to unpermitted or illegal activity related to this project.
72-3	Please see Section 3.11, <i>Public Services</i> , for an analysis of the county's ability to respond to unpermitted or illegal activity related to this project.
72-4	Thank you for your comment. This comment does not directly pertain to the analysis conducted as part the EIR. Your comment will be considered by decision makers in the review process of the proposed Project.
72-5	Thank you for your comment. This comment does not directly pertain to the analysis conducted as part the EIR. Your comment will be considered by decision makers in the review process of the proposed Project.
72-6	Please see Section 3.11, <i>Public Services</i> , for an analysis of the county's ability to respond to unpermitted or illegal activity related to this project.
72-7	Thank you for your comment. This comment does not directly pertain to the analysis conducted as part the EIR. Your comment will be considered by decision makers in the review process of the proposed Project.
Comments Received from Linda Price by Email	
73-1	Thank you for your comments. Chapter 2, <i>Project Description</i> , addresses required buffers under the project. Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , which addresses odor impacts. Your additional comments, while not directly pertaining to the analysis conducted as part of the EIR, will be considered by decision makers in the review process.
Comments Received from Lisa Overstreet by Email	

Table A-2. Responses to the NOP Comments

Comment #	Responses
74-1	Thank you for your comment. Please refer to Chapter 2, <i>Project Description</i> , which addresses proposed buffer setbacks under the Project. Your comments will be considered by decision makers during the review process.
Comments Received from Marc Cosentino	
75-1	Thank you for your comments. Please refer to Chapter 2, <i>Project Description</i> , which addresses proposed buffer setbacks under the Project. Refer also to Section 3.9, <i>Land Use and Planning</i> , which addresses impacts associated with land use compatibility.
Comments Received from Marsha Messmore by Email	
76-1	Thank you for your comments. Chapter 2, <i>Project Description</i> , describes zones where cannabis operations would be considered and proposed setback requirements. See also Chapter 4, <i>Alternatives Analysis</i> , which includes discussion of alternatives which consider revised eligible zone districts.
Comments Received from McCloskey Nursery by Email	
77-1	Thank you for your comment. This comment does not directly pertain to the analysis conducted as part the EIR. However, Section 3.2, <i>Agricultural Resources</i> , and Section 3.9, <i>Land Use and Planning</i> , provide discussion of compatibility of the Project with regard to agricultural resources, agricultural zoned lands, and compatibility with such lands and surrounding non-agricultural zoned lands. Your comment will be considered by decision makers in the review process of the proposed Project.
Comments Received from Meg Mori by Email	
78-1	Thank you for your comments. Please refer to Chapter 2, <i>Project Description</i> , and Section 3.9, <i>Land Use and Planning</i> , for a discussion on zoning under the project.
78-2	Please refer to Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , which addresses odor issues related to cannabis.
78-3	In accordance with the 2017 CEQA Statutes and Guidelines, the analysis contained within this EIR is intended to provide a complete analysis of the reasonably potential environmental impacts associated with implementation of the proposed project. As part of this analysis, project impacts to biological resources has been analyzed in Section 3.4, <i>Biological Resources</i> .
Comments Received from Merilly Peebles by Email	
79-1	Thank you for your comments. Please refer to Chapter 2, <i>Project Description</i> , addresses and describes the proposed permitting requirements for cannabis land uses by eligible zone, as well as includes discussion of cannabis activities as they relate to traditional agricultural practices and processes permitted within the County. For impacts resulting from the potential permitting of volatile manufacturing activities on agricultural zoned lands, please refer to Section 3.9, <i>Land Use and Planning</i> , which addresses potential land use compatibility conflicts from allowance of cannabis activities within eligible zones.
Comments Received from Michael Holiday by Email	
80-1	Thank you for your comments. Impacts associated with permitting of cannabis activities on eligible zone districts and potential for land use incompatibility are analyzed in Section 3.9, <i>Land Use and Planning</i> .

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Comment #	Responses
Comments Received from Michael Palmer by Email	
81-1	Thank you for your comments. Please refer to Chapter 2, <i>Project Description</i> , addresses and describes the proposed permitting requirements for cannabis land uses by eligible zone, as well as includes discussion of cannabis activities as they relate to traditional agricultural practices and processes permitted within the County. The proposed project currently considers allowance for volatile manufacturing and distribution in AG-1 and AG-II zones.
81-2	Thank you for your comments. As described in Chapter 2, <i>Project Description</i> , the proposed project currently proposes the allowance of distribution licenses on AG-I and AG-II zoned lands.
81-3	Thank you for your comments. As described in Chapter 2, <i>Project Description</i> , the proposed project does not currently propose the allowance of testing licenses in AG-I and AG-II zoned lands. However, your comments will be considered by decision makers in the review process of the proposed Project.
81-4	Thank you for your comments. As described in Chapter 2, <i>Project Description</i> , the proposed Project currently proposes the allowance of volatile manufacturing licenses on AG-I and AG-II zoned lands.
Comments Received from Mollie Culver by Email	
82-1	Thank you for your comment. Please refer to Section 3.2, <i>Agricultural Resources</i> , and Section 3.9, <i>Land Use and Planning</i> , for discussion and analysis of cannabis as it relates to the County's Right-to-Farm Ordinance and typical agricultural practices.
82-2	Thank you for your comments. This comment does not directly pertain to the analysis conducted as part the EIR. Your comment will be considered by decision makers in the review process of the proposed Project.
82-3	Thank you for your comments. Inclusion and requirement for best management practices that may have the effect of reducing impacts of the Project will be considered in this EIR, as well as considered by decision makers in the review process of the proposed Project. Applicability of these practices, as well as comparative analysis of cannabis to other agricultural crops is provided in Section 3.2, <i>Agricultural Resources</i> .
82-4	Discussion of unlicensed or "black market" cannabis operations currently occurring within the County is provided in Chapter 2, <i>Project Description</i> , and Chapter 3, <i>Environmental Impact Analysis</i> . Analysis of impacts associated with such operations is provided in Chapter 5, <i>Other CEQA</i> , under discussion of secondary impacts of the proposed Project.
82-5	As described in Chapter 2, <i>Project Description</i> , the proposed Project currently proposes the allowance of volatile manufacturing licenses on AG-I and AG-II zoned lands.
82-6	As described in Chapter 2, <i>Project Description</i> , the proposed Project currently proposes the allowance of distribution licenses on AG-I and AG-II zoned lands.
82-7	While not considered under the proposed Project, consideration of allowance of retail licenses on AG-I and AG-II zoned lands within the County is provided in Chapter 4, <i>Alternatives Analysis</i> .
Comments Received from the Native American Heritage Commission by Email	

Table A-2. Responses to the NOP Comments

Comment #	Responses
83-1	Thank you for your comments. This EIR has been prepared in accordance with the 2017 CEQA Statutes and Guidelines. Analysis of cultural and tribal cultural resources has been conducted in conformance with the requirements of CEQA and is provided in Section 3.5, <i>Cultural Resources</i> .
Comments Received from Patricia Hansen by Email	
84-1	Thank you for your comment. Discussion of impacts associated with polluted runoff from cannabis operations is provided in Section 3.8, <i>Hydrology and Water Resources</i> .
84-2	Discussion of impacts associated with vulnerability to and threat by wildfires and other natural hazards is provided in Section 3.7, <i>Hazards and Hazardous Resources</i> . Section 3.12, <i>Transportation and Traffic</i> , includes discussion and analysis of impacts associated with changes in traffic patterns, as well as changes in the safety of roadways, particularly in rural areas of the County. Section 3.10, <i>Noise</i> , addresses impacts associated with increases in the noise environment, both from construction and operational stationary or mobile noise sources.
84-3	Please refer to Section 3.6, <i>Geology and Soils</i> , which analyzes the potential for grading of slopes and subsequent potential for landslides, slope instability, erosion, and collapsible soils.
Comments Received from Patricia Hemni by Email	
85-1	Thank you for your comments. As described in Chapter 2, <i>Project Description</i> , the proposed Project does not currently propose the allowance of testing licenses in AG-I and AG-II zoned lands. However, your comments will be considered by decision makers in the review process of the proposed Project.
Comments Received from Patricia Kohlen by Email	
86-1	Thank you for your comment. Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , includes discussion and analysis of potential impacts associated with cannabis odors. Section 3.8, <i>Hydrology and Water Resources</i> , includes discussion of impacts to water resources, including groundwater supplies while Section 3.13, <i>Utilities and Energy Conservation</i> , addresses the Project's potential impact on increased demand for water and the availability of water supplies. Section 3.12, <i>Transportation and Traffic</i> , discuss and analyze the Project's potential to result in impacts from changes in traffic and the transportation network.
Comments Received from Patricia Ruben by Email	
87-1	Thank you for your comment. Please refer to Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , which addresses odor issues related to cannabis.
Comments Received from Peggy Zachariou by Email	
88-1	Thank you for your comment. Please refer to Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , which addresses odor issues related to cannabis. Section 3.1, <i>Aesthetics and Visual Resources</i> , includes discussion and analysis of impacts associated with lighting from cannabis operations. Section 3.11, <i>Public Services</i> , provides discussion and analysis of impacts associated with security and demand for law enforcement services. Section 3.9, <i>Land Use and Planning</i> , addresses impacts resulting from potential incompatibility of cannabis operations with surrounding land uses.

Table A-2. Responses to the NOP Comments

Comment #	Responses
88-2	Chapter 2, <i>Project Description</i> , addresses required buffers under the Project. Your comments will be considered by decision makers during the review process.
Comments Received from Tony and Rachel Amundsen by Email	
89-1	Thank you for your comments. This comment does not directly pertain to the analysis conducted as part the EIR. Your comment will be considered by decision makers in the review process of the proposed Project.
Comments Received from Randy Jones by Email	
90-1	Thank you for your comment. Please refer to Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , which addresses odor issues related to cannabis.
Comments Received from Riva and Kevin McLernon by Email	
91-1	Thank you for your comments. Project related setbacks and buffers are discussed in Chapter 2, <i>Project Description</i> . Section 3.11, <i>Public Services</i> , addresses impacts associated with safety of the public and law enforcement services. Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , addresses impacts associated with air quality and pollution, as well as odors from cannabis. Section 3.1, <i>Aesthetics and Visual Resources</i> , addresses impacts resulting from new light sources generated by cannabis operations.
91-2	Thank you for your comments. This comment does not directly pertain to the analysis conducted as part the EIR. Your comment will be considered by decision makers in the review process of the proposed Project.
Comments Received from Robert Lilley by Email	
92-1	Thank you for your comments. Chapter 2, <i>Project Description</i> , addresses required buffers under the Project and Section 3.9, <i>Land Use and Planning</i> , addresses land use impacts, compatibility, and concerns related to the Project.
Comments Received from Roxanne Lapidus by Email	
93-1	Thank you for your comment. A discussion of cannabis as it relates to the compatibility with Williamson Act lands and the County's Right-to-Farm Ordinance is provided in Section 3.2, <i>Agricultural Resources</i> . In addition, Chapter 4, <i>Alternatives Analysis</i> , includes consideration and analysis of a Williamson Act Preclusion Alternative, which would preclude cannabis from Williamson Act provisions.
93-2	Please refer to Chapter 2, <i>Project Description</i> , which addresses proposed buffer setbacks under the Project. Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , addresses impacts associated with air quality and pollution, as well as odors from cannabis.
93-3	This comment does not directly pertain to the analysis conducted as part the EIR. Your comment will be considered by decision makers in the review process of the proposed Project.
93-4	For discussion of impacts associated with cannabis water demands and availability of current and future water supplies, please refer to Section 3.13, <i>Utilities and Energy Conservation</i> .
93-5	Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , addresses impacts odors from cannabis while Section 3.9, <i>Land Use and Planning</i> , addresses impacts

Table A-2. Responses to the NOP Comments

Comment #	Responses
	associated with eligible zoning and compatibility with surrounding land uses. Section 3.1, <i>Aesthetics and Visual Resources</i> , addresses impacts resulting from new light sources generated by cannabis operations.
93-6	Section 3.11, <i>Public Services</i> , addresses impacts associated with the demand for law enforcement and fire protection services that may result from implementation of the Project.
93-7	Section 3.13, <i>Utilities and Energy Conservation</i> , provides discussion of both Project-specific and cumulative impacts associated with potential increases in demand for water and the current and future availability of water supplies.
Comments Received from Russell R. Ruiz by Email	
94-1	Thank you for your comments. Discussion of cannabis as it relates to agriculture and County policies and programs designed to protect agricultural resources is provided in Section 3.2, <i>Agricultural Resources</i> .
94-2	Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , addresses impacts odors from cannabis while Section 3.9, <i>Land Use and Planning</i> , addresses impacts associated with eligible zoning and compatibility with surrounding land uses.
94-3	Section 3.13, <i>Utilities and Energy Conservation</i> , addresses impacts associated with impacts associated with cannabis water demands and availability of current and future water supplies.
94-4	Thank you for your comment. Chapter 3, <i>Environmental Impact Analysis</i> , provides detailed discussion of assumptions that have been used to inform the analysis contained within this EIR while Chapter 2, <i>Project Description</i> , outlines existing environmental baseline to which the Project has been compared.
94-5	This comment does not directly pertain to the analysis conducted as part the EIR. Your comment will be considered by decision makers in the review process of the proposed Project.
Comments Received from Sandy Mezzio by Email	
95-1	Thank you for your comment. Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , addresses impacts odors from cannabis.
Comments Received from Santa Barbara Channelkeeper by Email	
96-1	Thank you for your comment. Impacts associated with runoff from cannabis operations which may result in adverse effects to water quality and hydrology are addressed in Section 3.8, <i>Hydrology and Water Resources</i> .
96-2	Section 3.8, <i>Hydrology and Water Resources</i> , includes discussion of impacts to water resources, including groundwater supplies while Section 3.13, <i>Utilities and Energy Conservation</i> , addresses the Project's potential impact on increased demand for water and the availability of water supplies. As such impacts related to species and habitat, discussion is provided in Section 3.4, <i>Biological Resources</i> .
96-3	Where development standards, best management practices, or additional measures are required to reduce impacts on the environment from increases in water demands and runoff, mitigation has been considered and incorporated into appropriate sections of this EIR.
Comments Received from Sara Rotman by Email	

Table A-2. Responses to the NOP Comments

Comment #	Responses
97-1	Thank you for your comment. Comparative analysis of water demands of cannabis and most common agricultural crops grown in the County is provided in Section 3.13, <i>Utilities and Energy Conservation</i> , to help inform the analysis of potential impacts of the Project on water demand.
97-2	To the extent relevant, comparative analysis of the impacts associated with runoff and waste generated by cannabis and other agricultural crops is provided in Section 3.8, <i>Hydrology and Water Quality</i> .
97-3	Comparative analysis of cannabis to other agricultural crops grown within the County is provided in Section 3.2, <i>Agricultural Resources</i> . However, comprehensive analysis of the impacts of each crop is not considered within the scope of this EIR.
Comments Received from Santa Barbara Air Pollution Control District by Email	
98-1	Thank you for your comment. Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , addresses impacts odors from cannabis and measures included as part of the general development standards of the Project which would serve to reduce odor-related impacts associated with the Project. Included in this discussion is consideration of applicable Air Pollution Control District standards for addressing and mitigating impacts from odors.
98-2	Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , addresses impacts associated with construction and operational stationary and mobile source emissions. Where necessary, mitigation measures consistency with Air Pollution Control District standards have been required to reduce Project impacts to air quality.
98-3	Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , addresses impacts associated with construction and operational stationary and mobile source emissions. Where necessary, mitigation measures consistency with Air Pollution Control District standards have been required to reduce Project impacts to air quality.
98-4	Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , addresses impacts associated with construction and operational stationary and mobile source emissions. Where necessary, mitigation measures consistency with Air Pollution Control District standards have been required to reduce Project impacts to air quality.
Comments Received from Sheryl Robinson by Letter	
99-1	Thank you for your comments. These comment does not directly pertain to the analysis conducted as part the EIR. Your comment will be considered by decision makers in the review process of the proposed Project.
99-2	Thank you for your comment. Section 3.9, <i>Land Use and Planning</i> , addresses impacts associated with eligible zoning and compatibility with surrounding land uses.
Comments Received from Susan Murphy by Email	
100-1	Thank you for your comments. These comment does not directly pertain to the analysis conducted as part the EIR. Your comment will be considered by decision makers in the review process of the proposed Project.
100-2	Chapter 2, <i>Project Description</i> , describes zones which are eligible for permitting of cannabis activities under the proposed Project. For land use and zoning concerns please refer to Section 3.9. <i>Land Use and Planning</i> and Chapter 2, <i>Project Description</i> .

Table A-2. Responses to the NOP Comments

Comment #	Responses
100-3	Please refer to Chapter 2, <i>Project Description</i> , which addresses proposed buffer setbacks under the Project. Your comments will be considered by decision makers during the review process.
100-4	Thank you for your comment. For land use and zoning concerns please refer to Section 3.9. <i>Land Use and Planning</i> and Chapter 2, <i>Project Description</i> .
100-5	Chapter 2, <i>Project Description</i> , describes zones which are eligible for permitting of cannabis activities under the proposed Project. For land use and zoning concerns please refer to Section 3.9. <i>Land Use and Planning</i> and Chapter 2, <i>Project Description</i> .
100-6	This EIR considers and analyzes the environmental effects of the proposed Project. Where applicable, comparative analysis of the effects of cannabis in various states and cities is provided.
100-7	Thank you for your comment. For land use and zoning concerns please refer to Section 3.9. <i>Land Use and Planning</i> and Chapter 2, <i>Project Description</i> . Impacts of the Project on farmland and agricultural resources is provided in Section 3.2, <i>Agricultural Resources</i> .
Comments Received from Thomas and Charmaine Rogers by Email	
101-1	Thank you for your comment. Please refer to Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , which addresses odor issues related to cannabis.
101-2	Please refer to Chapter 2, <i>Project Description</i> , which addresses proposed buffer setbacks under the Project. Since the EIR does not evaluate economic impacts, only environmental impacts, the decision makers will review comments related to the Project merits and economics.
101-3	Thank you for your comments. These comment does not directly pertain to the analysis conducted as part the EIR. Your comment will be considered by decision makers in the review process of the proposed Project.
Comments Received from Tim Mossholder by Email	
102-1	Thank you for your comments. Impacts related to additional security measures and demand for law enforcement services related to cannabis are discussed in Section 3.11, <i>Public Services</i> . For land use and zoning concerns please refer to Section 3.9. <i>Land Use and Planning</i> and Chapter 2, <i>Project Description</i> .
102-2	Please refer to Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , which addresses odor issues related to cannabis.
Comments Received from Todd and Rosa Booth by Email	
103-1	Thank you for your comment. Please refer to Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , which addresses odor issues related to cannabis.
Comments Received from Tom and Denise Peterson by Email	
104-1	Thank you for your comments. For detailed discussion of the cannabis Licensing Program and permit review process, refer to Chapter 2, <i>Project Description</i> .
104-2	This comment does not directly pertain to the analysis conducted as part the EIR. Your comment will be considered by decision makers in the review process of the proposed Project.

Table A-2. Responses to the NOP Comments

Comment #	Responses
104-3	Section 3.7, <i>Hazards and Hazardous Materials</i> , addresses impacts associated with hazardous wastes, contamination, and release of hazardous materials into the environment.
104-4	Section 3.8, <i>Hydrology and Water Resources</i> , addresses potential impacts to water quality, runoff, flood and drainage, and groundwater recharge related to the Project.
104-5	Section 3.8, <i>Hydrology and Water Resources</i> , addresses potential impacts to water quality, runoff, flood and drainage, and groundwater recharge related to the Project.
104-6	Refer to Section 3.13, <i>Utilities and Energy Conservation</i> , for discussion of supply and demand for utility services which include electricity and water supplies and services.
104-7	Please refer to Section 3.10, <i>Noise</i> and Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , which address your noise and air pollution concerns related to the use of portable diesel and gasoline generators.
104-8	Impacts related to additional security measures and demand for law enforcement services related to cannabis are discussed in Section 3.11, <i>Public Services</i> . Impacts associated with lack of or demand for wastewater services, including installation of Onsite Wastewater Treatment Systems, are analyzed in Section 3.13, <i>Utilities and Energy Conservation</i> .
104-9	Regarding impacts from employee traffic and truck trips, Section 3.12, <i>Transportation and Traffic</i> , describes the Project's potential to result in changes in the transportation environment from the permitting of cannabis uses in eligible zone districts.
104-10	Please refer to Section 3.4, <i>Biological Resources</i> , which addresses impacts associated with the potential clearing and removal of trees, as well as impacts to other important biological resources.
104-11	Please refer to Section 3.4, <i>Biological Resources</i> , which addresses impacts to sensitive biological resources, including special status plant or wildlife species.
Comments Received from Unknown Letter	
105-1	Thank you for your comment. For land use and zoning concerns please refer to Section 3.9, <i>Land Use and Planning</i> and Chapter 2, <i>Project Description</i> .
105-2	This comment does not directly pertain to the analysis conducted as part the EIR. Your comment will be considered by decision makers in the review process of the proposed Project.
105-3	Refer to Section 3.11, <i>Public Services</i> , which discusses impacts associated with public safety and effects on law enforcement services.
Comments Received from Valerie Bentz	
106-1	Thank you for your comment. Please refer to Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , which addresses odor issues related to cannabis.
106-2	Thank you for your comment. For discussion of impacts related to zoning and land use compatibility, see Section 3.9, <i>Land Use and Planning</i> .
Comments Received from Vicky Lorelli by Email	
107-1	Thank you for your comment. Please refer to Section 3.3, <i>Air Quality and Greenhouse Gas Emissions</i> , which addresses odor issues related to cannabis. For discussion of

Table A-2. Responses to the NOP Comments

Comment #	Responses
	impacts related to zoning and land use compatibility, see Section 3.9, <i>Land Use and Planning</i> .
107-2	This comment does not directly pertain to the analysis conducted as part the EIR. Your comment will be considered by decision makers in the review process of the proposed Project.
Comments Received from William T. Potts by Email	
108-1	Thank you for your comments. Refer to Section 3.13, <i>Utilities and Energy Conservation</i> , for discussion of supply and demand for utility services which include electricity and water supplies and services. Refer to Section 3.11, <i>Public Services</i> , which discusses impacts associated with public safety and effects on law enforcement services. For discussion of impacts related to zoning and land use compatibility, see Section 3.9, <i>Land Use and Planning</i> .

Cruz, Patrick

From: adrianlar@gmail.com
Sent: Thursday, July 20, 2017 1:42 PM
To: Metzger, Jessica
Subject: Re: recreational marijuana grow license

Jessica,

1-1 It was nice speaking with you today. I would like to ask that you allow AG-1 parcels of 20 acres to receive a microbusiness, Type-1, Type-2 or Type-3 license. We are large enough and located in a rural area, that we would not cause any disturbance to our neighbors.

Thanks,
Adrian

On Thu, Jul 20, 2017 at 8:08 AM, Metzger, Jessica <jmetzger@co.santa-barbara.ca.us> wrote:

> Adrian,
> No license are are being issued at this time. Please review these websites and sign up for our email list. After reviewing them if you have additional questions feel free to call me.
> <http://www.countyofsb.org/cannabis-committee.sbc>
> <http://longrange.sbcountyplanning.org/programs/Cannabis/cannabis.php>

>
> Cheers,
>
> Jessica Metzger, AICP
> Senior Planner
> Long Range Planning - County of Santa Barbara
> 123 East Anapamu Street
> Santa Barbara, CA 93101
> p: 805-568-3532

>
>
>
> -----Original Message-----
> From: adrianlar@gmail.com [<mailto:adrianlar@gmail.com>]
> Sent: Wednesday, July 19, 2017 6:59 PM
> To: Metzger, Jessica
> Subject: recreational marijuana grow license

>
> I am interested in applying for a recreational/commercial grow license in the unincorporated part of Santa Barbara County. We have 20 acres in the city of Goleta and the unincorporated part of Santa Barbara County. What is the current process and whom do I speak with?

>
> Thanks,
> Adrian
> 805-455-5836

Metzger, Jessica

From: Alison Matri [alison8261@gmail.com]
Sent: Thursday, August 10, 2017 5:13 PM
To: Cannabis Info
Subject: Cannabis Cultivation

Dear Supervisors

RE: Proposed Cannabis Cultivation

2-1

It is understood that our two North County supervisors have now been hidden away working as an ad-hoc committee on the cannabis grow plan for over 6 months. This is illegal and must be disbanded immediately. The Brown Act requires that all five supervisors be directly involved and with full public disclosure.

Alison Matri
5002 Oak Ridge Rd
Santa Barbara, CA 93111

Metzger, Jessica

From: Alison Matri [alison8261@gmail.com]
Sent: Friday, August 11, 2017 10:47 AM
To: Cannabis Info
Subject: Cannabis Cultivation

Dear Supervisors

RE: Proposed Cannabis Cultivation: Warnings

- 3-1 | Please be aware that SB County communities will be paying an extremely high price both health wise and financially if the commercial cultivation of cannabis is permitted and especially if within one mile of residential areas, schools, and wherever people congregate such as for sporting events.
- 3-2 | Cannabis requires huge amounts of fertilizer the run off of which will poison and deplete our water tables and kill our plant life.
- 3-3 | Grow house emissions are highly toxic not only to the environment but also to we humans, our pets and livestock.
- 3-4 | Due to the enormous demands upon our limited natural resources the eventual consequence of permitting cannabis grow operations will be the desertification of our beautiful SB county.

Help save our environment for future generations.

Alison Matri
5002 Oak Ridge Rd
Santa Barbara, CA 93111

Metzger, Jessica

From: Alison Mastri [alison8261@gmail.com]
Sent: Friday, August 11, 2017 1:38 PM
To: Cannabis Info
Subject: Land and other Issues

The big issue regarding the cannabis industry is the effect on our land. Its inherently high traffic will result in increased dust problems particularly so in our dry climate. Also the 24/7 need for grow house heat and light will affect our local climate in that our night sky

4-1 | will become more like that of dawn thus upsetting our ability to sleep. This could be harmful to our animal world especially birdlife.

4-2 | Air quality will be downgraded due to the toxicity of the grow house emissions.

4-3 | Biological issues such as run-offs from 'grows' will poison our plant life and water sources.

4-4 | Public safety will be affected particularly from the cash nature of the grow business.

4-5 | Surely allowing such an activity is inappropriate in mixed use zoning and Ag1 land.

Alison Mastri
5002 Oak Ridge Rd
Santa Barbara, CA 93111

Metzger, Jessica

From: Allan Weil [alweil@cox.net]
Sent: Friday, August 11, 2017 3:37 PM
To: Williams, Das; Cannabis Info
Cc: Metzger, Jessica; Leyva, Petra
Subject: Obnoxious Cannabis Odors

I have been and still am deeply concerned with the continuous obnoxious Cannabis odors in our beautiful Carpinteria Valley.

5-1

The smell is especially strong along Casitas Pass Rd near the Casitas Pass/ Foothill Rd. junction area, eastward and westward.

Also, the smell is very strong along Foothill Road from Linden and in front of and behind the Carpinteria High School area.

What can be done to mitigate this foul odor? I am embarrassed when friends, relatives and acquaintances come to visit. This affects our area, businesses, real estate and representation of being a small beach town "paradise!"

5-2

The impact of Cannabis will only add to the existing hazards of driving under the influence of alcohol and/or driving while using a smart phone.

Now driving under the influence of Cannabis has no reliable test or penalty!

5-3

Increasing unwanted and invasive nightly light pollution in these same areas are another intrusion into our Carpinteria way of living.

I am personally exposed to the recent explosion of building new greenhouses, many of the makeshift variety, with recent added lighting.

5-4

With the increase amount of cash and cash transactions being dumped into our area, it is only a matter of time before the criminal element and the influence of money on city, county government and the public becomes a major problem.

I am strongly encouraging your continued attention to these vitally important issues for all of Carpinteria Valley.

Al Weil
7165 Shepard Mesa Rd.
Carpinteria, CA 93013

805-453-8815

Dear Ms. Metzger,

We are residents of Blazing Saddle Drive in the Tepusquet Canyon. We have the following concerns about the Environmental Impact of Cannabis farming in Santa Barbara County and specific concerns regarding Tepusquet Canyon, especially in light of the recent Alamo fire and the vulnerabilities it illustrated regarding our specific area.

Tepusquet Canyon is a unique ecosystem, and one that is specifically unable to support this kind of agriculture. Allowing cannabis farming in our community and environment would cause considerable damage to the wildlife, protected ancient oak woodlands, and to the well-being of the long term residents, their families, and their homesteads.

Many of these negative impacts are already being experienced recently due to cannabis growers' recent land acquisition, excavation, construction, well digging, and other preparation of the area for growth, as well as existing unpermitted, illegal operations currently active in the canyon.

This community, much of which intimately knows and has helped manage this delicate ecosystem over decades and generations, is unanimously opposed to the development of this business in our canyon and mountains. We intend to challenge this development with our voices, our resources, and our votes.

PLEASE CONSIDER:

- 6-1 | 1. The impact of a high-water use crop like Cannabis on Oak Woodlands. For example, Tepusquet Canyon and mountains have a significant and unique but struggling population of Valley Blue, (both old growth and young) that depend on significant groundwater availability, have already suffered a record drought, and now the Alamo Fire. The woodlands also include Live Oaks.
- 6-2 | 2. The impact on wildlife of pesticides, rodenticides, fungicides and fertilizers that are often used in cannabis farming due to its vulnerability to many pests and animals and the need for heavy amendments to nitrogen-poor soil.
- 6-3 | 3. Also consider the likely unpermitted poaching and thinning of the animal population such as deer which love to graze on this crop.
- 6-4 | 4. The impact of clearing oak woodlands and chapparral in the cannabis farmer's preferred locations of remote, mountainous areas for growing areas and paths through the Oak woodlands. The mountainous landscape is already vulnerable to erosion due to fire and loss of vegetation. It is not able to handle the grading and further destruction of slope stabilizing plant life.
- 6-5 | 5. The impact of runoff from the use of herbicides and pesticides, from mountain creeks into Tepusquet Creek, leading to the Santa Maria river. These chemicals also impact the red tail hawks and turkey vultures who may feed on poisoned rodents and impact their population.
- 6-6 | 6. Tepusquet Canyon is on a separate water table from Santa Maria and does not have enough water to support this crop. Residents have documented regular transport of water from Santa Maria to the canyon and mountains, which is a violation of CEQA.
- 6-7 | 7. The impact on wildlife of reduced habitat and the disruption of migratory wildlife corridors necessary for the conservation of habitat.
- 6-8 | 8. The aesthetic impacts on areas historically considered scenic corridors.
- 6-9 | 9. The increased commercial traffic on the single-lane road that takes residents in and out of the area and the danger to the lives of the residents in the event of fire and flood evacuation. Please reference the Berkeley Hills After Action Fire Report for important learnings of such industrial impacts on loss of life and property in remote limited-access communities.
- 6-10 | 10. The remote distance of Tepusquet Canyon from police services and protection from criminal activity associated with a crop that is forbidden by federal law.

- 6-11 | 11. Light trespass and light pollution from security-related and cultivation-related lighting and its impact on neighbors and the circadian rhythms of animals and trees.
- 6-12 | 12. The inability for the county to regulate this crop when placed in remote and hidden areas such as Tepusquet.
- 6-13 | 13. The use of Portable diesel and gasoline generators, its noise pollution and its impact on local air quality impacts and associated high emissions (PM10, PM2.5 and other criteria pollutants).
- 6-14 | 14. The possibility of wine taint when nearby cannabis plants and the accompanying odors affect the long-time winery's crops and interfere with their use of the land.
- 6-15 | 15. Please also consider that owners of properties nearby cannabis farmers can sue these farmers as racketeering enterprises that injure the plaintiff's use of business of property under the federal Racketeer-Influenced and Corrupt Organization Act. As Cannabis farming is a felony under federal law, it qualifies as racketeering activity. This has been established by the US Court of Appeals for the 10th Circuit in Safe Streets Alliance v Alternative Holistic Healing, LLC.

Thank you for your consideration.

Sincerely,

Alyssa and Barak Moffitt

August 11, 2017

TO: Jessica Metzger
Project Manager, Planning and Development

FROM: Andrew Hazi
haziand@aol.com
805-680-9461

SUBJECT: Preparation of the EIR for the Cannabis Land Use Ordinance and
Licensing Program

The purpose of this email is to provide our input/comments on the scope and content of the environmental information to be included in the EIR.

We have lived in Tepusquet Canyon for over 43 years and have seen the changes brought on by the growth of the Santa Maria area during that time. We have serious concerns about the potential environmental impact of existing and future commercial cannabis operations in Tepusquet canyon (unincorporated area of the County). Our concerns include: (1) adverse impact on the local aquifer and the water supplies for local residents and (2) adverse environmental impact due to air, water and noise pollution.

(1) One of the important environmental issues to be included in the EIR is the impact of commercial cannabis operations on local water supplies. According to a survey of growers by the Mendocino Cannabis Policy Council, one plant uses about 480 gal of water during the growing season. On the other hand, a report by the CA Department of Fish and Wildlife estimated that in Mendocino and Humboldt Counties, a single cannabis plant uses about 900 gal of water per season. Using these numbers as bounds, one can estimate that one acre of land with 400 plants, which would produce about 800 lbs of cannabis, requires between 190,000 and 360,000 gallons of water. Commercial cultivation on a large scale (100's of acres) in Tepusquet would place a significant new demand on the local water supply. A large fraction of the water supply in the area is "geologic" water, i.e., it is not replenished on a short time-scale by the annual rainfall. When this water is used up, it is GONE for generations! Based on our own experience, there has already been a noticeable decrease in the water table in Tepusquet Canyon since the 1970's, due to the widespread planting and cultivation of wine grapes on the Santa Maria Mesa and increased residential use in the canyon.

At the recent meeting held in Santa Maria to gather public input to the preparation of the EIR, Bruce Watkins submitted a detailed report on the Sub-surface Geology and Aquifer Analysis of Upper Tepusquet Canyon. (Mr. Watkins manages the development of and operations on 410 acres of land – shown in Attachment C of the report – which is owned by Unified Investments, Inc, with a corporate address in Danville CA.) The following points should be noted about this report.

7-1
Cont.

- (i) While the title of the report refers broadly to “Upper Tepusquet Canyon”, it’s primary focus is an area lying west of Tepusquet Road, and south of the ridge separating Tepusquet Canyon on the south and Buckhorn Canyon on the north. It does not address nearby areas lying east of Tepusquet Rd.
- (ii) While the report provides scientific evidence that the deep (200-500 ft) subterranean aquifer lying beneath the above-mentioned land is physically separated from the surface waters of Tepusquet Creek and the southerly portions of the canyon by the geologic formation in the area, it does not address the potential impact on the water supplies for adjacent properties (located off Blazing Saddle Rd.). Due to their close proximity, it is likely that the wells on some of these properties draw water from the same subterranean aquifer.
- (iii) Attachment E of the report analyzes the anticipated water use by the planned cannabis operations on the above-mentioned land and compares it to the amount of water estimated to exist in the subterranean aquifer. Based on this comparison, the lifetime of the aquifer is estimated about 10 years. A water supply that is expected to last a decade would hardly support a sustainable, water-use intensive, agricultural operation. Attachment E implies that this deep subterranean aquifer would be replenished by the annual rainfall, but the report provides no evidence or estimate of the replenishment rate, which would depend on the average annual rainfall, the size of the watershed that is potentially able to feed the aquifer based on the local geology, and the transport rates between the subsurface and the deep aquifer.
- (iv) With its specific focus on a particular area of upper Tepusquet Canyon, the report’s conclusions do not apply broadly to the Tepusquet area, primarily because of the local variations in the underlying geological formations and in the depth of the water table below the surface. For example, there is a 49-acre parcel just east of the area discussed in the report, on the east side Tepusquet Road, where the headwaters and upper reaches of Tepusquet Creek are located. Currently, there are five wells (only 2 of them with permits) in operation on this parcel. One of the wells is apparently located in the creek bed. Water from these wells are used to support existing operations, and is also transported via trucks down the canyon to another parcel, where is no local water supply for the cannabis cultivation that has occurred for years.

7-2

(2) Other important environmental issues to be included in the EIR are the effects of air, water and noise pollution by commercial cannabis operations. It has been well documented that cannabis cultivation and processing in rural areas and forest lands often involve the discharge of pesticides, rodenticides, fertilizers and waste produced by operations into the soil and local waterways. This has a detrimental impact on the local environment including the native wildlife. In an area such as Tepusquet Canyon, which is on the rural-wildland interface, such contamination may constitute a health hazard to the local community and also to the wildlife. Hazardous material discharge into local waterways and the ground water is a

7-2
Cont. | serious environmental concern. That is why wells located on land used for commercial agricultural operation in the Santa Maria basin are regularly tested for contaminants.

7-3 | Furthermore, many of the currently undeveloped parcels in the Tepusquet area, which could be developed for commercial cannabis cultivation, do not have electricity due to their remote locations relative to existing (PGE) power lines. Thus, such operations, which require power-intensive water pumping/irrigation, would necessitate the use of large generators or solar power farms. The former would lead to excessive carbon emissions and noise pollution. There already are ongoing cannabis operations in Tepusquet Canyon, where neighboring property owners have complained about excessive noise pollution from large generators, as well as light pollution from operations conducted at night.

Submitted respectfully by:

Andrew Hazi
P.O. Box 6161
Santa Maria, CA 93456
805-680-9461
haziand@aol.com

Cruz, Patrick

From: Klemann, Daniel
Sent: Monday, July 24, 2017 8:26 AM
To: 'barbk77@cox.net'
Cc: Metzger, Jessica; Fogg, Mindy; Black, Dianne; Russell, Glenn; Bozanich, Dennis
Subject: RE: CANNABIS QUESTION

Good Morning, Ms. Kloos:

Ms. Black and Dr. Russell forwarded your email (below) to me, in order to provide you with a response.

The Board of Supervisors (Board) formed an ad hoc committee, headed by Sup. Williams and Sup. Lavagnino, to advise the Board on cannabis regulations. Staff on the ad hoc committee (in coordination with the environmental consultants who are preparing the environmental impact report for this project) was primarily responsible for drafting the project description and other scoping documents for the environmental analysis of the ordinance amendments, based on the Board's input so far on this project.

With regard to the zones in which cannabis activities might be allowed (be it in the Eastern Goleta Valley or elsewhere in the unincorporated areas of the County), no decision has been made regarding where these activities will be allowed. The ad hoc committee drafted a project description that was purposefully broad (i.e., it included a number of zones in which cannabis activities may or may not be allowed) in order to provide the Board with as many policy options as possible. The Board has the discretion to determine in which zones (if any) it will allow cannabis activities. If the project description does not include a potential zone in which cannabis activities could be allowed, the Board cannot consider allowing the cannabis activities in that zone. Therefore, the project description includes a number of zones in which the Board may allow cannabis activities.

With regard to the Planning Commissions' input on the ordinance amendments, the Planning Commissions will have an opportunity to formally consider and advise the Board on what ordinance amendments should be adopted. Given the State's intention to start issuing State licenses for cannabis activities starting on January 1, 2018, we are trying to establish the County's local regulations in compliance with State law, as close as possible to that date. Currently, we are shooting for a Board hearing in February 2018. Due to this accelerated schedule, we did not have the luxury of developing the ordinances as part of a series of Planning Commission hearings, public workshops, etc., before initiating the environmental analysis for the project. However, we will be scheduling an informal update for the County Planning Commission on September 6, 2018, and intend to schedule the Montecito Planning Commission hearing in December 2017 and County Planning Commission hearing in January 2018, at which the Commissions will consider and provide a formal recommendation to the Board regarding the ordinance amendments and associated environmental document. In doing so, we will fulfill the regulatory requirements of CEQA and the Government Code, cited in your email below.

Finally, State law will prohibit cannabis activities located within 600 feet of a youth facility. Furthermore, the Board has the discretion to increase the 600 buffer from youth facilities, if it finds that there is a compelling reason to do so. This setback requirement—along with a number of other site-specific factors—will be considered when making a recommendation to the Board about where cannabis activities should be allowed. By no means should it be assumed that cannabis activities will be allowed in all of the zones identified in the environmental scoping documents; we expect the Board will limit where and under what conditions cannabis activities will be allowed.

If you have any other questions about this project, please give me a call at the number below to discuss them.

Best.

Dan Klemann, Deputy Director
Long Range Planning Division

Santa Barbara County Planning and Development Department
123 E. Anapamu Street
Santa Barbara, CA 93101
805.568.2072 | dklemann@countyofsb.org

From: Barbk <barbk77@cox.net>

Date: July 20, 2017 at 10:21:39 PM PDT

To: Glenn Russell <grussell@co.santa-barbara.ca.us>, <dianne@co.santa-barbara.ca.us>

Subject: CANNABIS QUESTION

Hi Glenn and Dianne,

I've been attending and tracking the marijuana meetings to stay informed about the upcoming land use regulations that will take effect this year. I've read the *Scoping Document* and the *Land Use Ordinance* and am surprised at how much of the zoning in the Eastern Goleta Valley is set to include all phases of marijuana manufacturing and distribution/sales. It is staggering! I am wondering how this got so far without the public having an opportunity to weigh in, and what the process has been for deciding all this? Who is proposing this draft ordinance since neither the Planning Commission nor the Supervisors have seen it?

One glaring omission is that the Planning Commission seems to be omitted from giving guidance on this project. Is this true? If so, isn't this a departure of the normal process the County adheres to and the State law governing zoning (see below), as well as a violation of CEQA?

It appears that the Hollister corridor (between 154 and Magnolia Shopping Center) is slated to become the marijuana capitol for the County. There are numerous youth organizations in this area and I feel sure that it would be completely unacceptable for residents here to allow the cannabis industry to use our community for their gain. I don't understand how something so expansive that will negatively impact our community has evolved to this place without the public being more involved and the Planning Commission excluded from the process. Glenn, do you have the authority to make sure the PC is included **EARLY** in the process of the vetting of this project?

Thank you for your attention to this.

Kindly,

Barb Kloos

Eastern Goleta Valley

TITLE 7. PLANNING AND LAND USE

The planning commission shall hold a public hearing on the proposed zoning ordinance or amendment to a zoning ordinance. Notice of the hearing shall be given pursuant to Section 65090 and, if the proposed ordinance or amendment to a zoning ordinance affects the permitted uses of real property, notice shall also be given pursuant to Section 65091.

Metzger, Jessica

From: Barbk [barbk77@cox.net]
Sent: Friday, August 11, 2017 10:25 AM
To: Metzger, Jessica
Cc: Wolf, Janet; Brown, Cecilia
Subject: COMMENTS RE: CANNABIS ORDINANCES

Comments on Scoping Document and Implementation of Cannabis Ordinances in County:

The ordinance process has been in progress since February, 2017. The public is just now becoming aware of the issues as there has been little, if any, notification sent to the residents of the County, and particularly, the Eastern Goleta Valley where I reside. The only noticing that has been sent out is to people who signed-up to be informed, which has been primarily, the cannabis community. This significant issue should have been communicated to everyone in the County so that all citizens would have an understanding of what is being proposed and have adequate time to respond. Why was it decided to not inform the residents of the communities that will be impacted?

Interestingly, this is an excerpt of an article that appears in the L.A. Times today: "Many residents and former city officials complain that they've had little input in drafting a marijuana ordinance that has undergone several revisions and amendments. They accuse city leaders of failing to address major questions about the costs and benefits of allowing commercial marijuana activities."

The Draft EIR was released 6 days prior to the public Scoping meeting. That is hardly enough time for the Supervisors to look it over, or for the public to review it and comment at the meeting. Looks suspicious.

9-1

The ad-hoc committee should be disbanded and the remainder of the process be carried out among all 5 Supervisors. This project is way too large scale to be conducted by only 2 Supervisors with deferred updates to the other Supervisors. There is no way for the public to know what is going on and it appears to be rather secretive. The public wants transparency and knowledge about what is being discussed and who attends the meetings. These kinds of private meetings breed distrust from the public. Additionally, Supervisor Wolf is not part of these proceedings and her district is the one that will potentially be the most impacted. This is highly unorthodox and needs to be corrected by coming under the Brown Act.

What are the Supervisors doing to learn from the expansion of the marijuana industry in Colorado? I have heard first-hand, read, and researched so much about the negative impacts to communities, neighborhoods, and businesses. Despite the frenzy to get cannabis into our communities, we cannot close our eyes to the bigger picture and the long-term effects it will have on our society. This is a game changer in many ways and I hope that revenue and ideology do not blind the County leaders in this process. As I've read and talked to pro-cannabis people, they seem hostile and aggressive with limited capacity to understand the bigger picture of how the community will be affected. Their main message is to ridicule and condemn people who want to act responsibly and reasonably about sensible placement and operation in our community.

The date set to finalize the ordinances, February 2018, is much too soon. The Planning Commission has spent YEARS working through land use issues, specifically the wine country in North County. They will have about 4 months to review the Cannabis ordinances and the EIR which is far too little time for an industry with huge impacts to the entire community and surrounding cities.

There is no driving urgency to finalize ordinances at break-neck speed. The State has given cities and counties wide latitude to take their time in implementing regulations, or banning cannabis altogether. We need to slow down and do smart planning. We need to start small and add more industry based businesses if needed, perhaps in 2-5 years. We need to see how the small steps impact our semi-rural community. The overall process to date has been reckless and deficient considering the scope of potential changes to our community.

Respectfully,
Barbara Kloos
Eastern Goleta Valley

Metzger, Jessica

From: Barbara Widmer [blwidmer@gmail.com]
Sent: Friday, August 11, 2017 10:26 AM
To: Cannabis Info
Cc: Wolf, Janet
Subject: rezoning for pot

Jessica Metzger, Project Manager,

10-1 | I have just heard that there are efforts to rezone Lane Farms to be used for growing marijuana. Though I believe that marijuana should be legalized, it seems that there is a rush to allow marijuana fields within our community without properly informing the community, having open discussions and finding areas within the county that are appropriate.

10-2 | There evidently have been problems associated with the growing of pot in Camarillo including, but not limited to unsightly fences with razor wire, increase of petty crime nearby, people having to purchase the product with cash, and odor.

These issues must be openly considered prior to designating any farms, particularly those close or adjacent to neighborhoods, as eligible to grow marijuana.

Yours,

Barbara Widmer
805-272-5498

JULY 30, 2017

GOOD AFTERNOON,
JESSICA MELZER,
PLANNING AND DEVELOPMENT.

IF YOU SMOKE MARIJUANA
FOR 10 YEARS YOUR I. Q.
WILL BE LOWERED BY 8 POINTS.

11-1 IT COST 50-60 - DOLLARS
FOR A 3^g PACKAGE. YOU
COULD SPEND 1,000 - TO
2,000.⁰⁰ A YEAR, SMOKING
MARIJUANA.

I HAVE GIVEN A LECTURE
ABOUT MARIJUANA, TO
HIGH SCHOOL STUDENTS.

RESPECTFULLY,

Bob Brown,

R. PH.

PURDUE - 'S,

Cruz, Patrick

From: Donna and Bob Jordan [bdjordan@cox.net]
Sent: Sunday, August 06, 2017 10:56 AM
To: Metzger, Jessica
Subject: Cannabis Land Use Ordinance and Licensing Program

Jessica,

My wife and I live in the City of Carpinteria. This morning we woke up and smelled something foul in the air. It approximated the odor made by a skunk, but I've smelled enough of that odor to judge that it wasn't. The morning air was very still so there was little movement and the odor persisted.

I'm not opposed to cannabis as a crop, but I will become opposed unless effective steps can be taken to eliminate the odor problem. Why should a small population of people be permitted to foul the air breathed by all of us?

The greenhouse industry has gone high tech so they should be able to address this problem by employing hepa-filters to scrub exhaust air and perhaps processing their products in climate controlled clean rooms where odors can be removed. I'm not against them making a buck, but I'll draw the line when it creates a stink.

Bob Jordan
1360 La Mesa Plaza
Carpinteria, CA 93013
684-0414

Metzger, Jessica

From: Bonnie Freeman [bonniegoleta@cox.net]
Sent: Friday, August 11, 2017 3:34 PM
To: Villalobos, David
Cc: Metzger, Jessica
Subject: Comments re MAUCRSA

Dear County and Montecito Planning Commissioners,

13-1 As a concerned community member and EGVPAC on the EGV Community Plan, I would like to say that i have many concerns re the proposed Cannabis Land Use Ordinance that I've finally had the opportunity to go through. While I appreciate the work gone into this project I have so many questions and concerns that I fear the average person will also find confusing if more public meetings are not planned (than what I see is already proposed) and since my computer crashed I cannot go into details on my cell just now.

But main areas of concern are some allowed uses in AG-1 properties, shopping centers, nearby schools, parks, public facilities, and many environmental impacts with noise, energy, lighting, etc for the EIR that need to be defined further and/or explained in small group meetings at times working community members could attend. This is a huge project and getting this short notice is problematic. Please do not leave this to just the upcoming PC or Montecito land use committees for explanation, it requires much more comprehension, and scrutiny.

Thank you for your consideration,
Bonnie Freeman
415 W Quinto St, SB 93105
805/683-1878

Sent from my iPhone

Cruz, Patrick

From: Bonnie Muench [bonniemuenchart@gmail.com]
Sent: Tuesday, August 08, 2017 8:01 AM
To: Cannabis Info
Subject: opposition permits to grow marijuana in neighborhoods

Attention: Jessica Metzger
Project Manager
SB County Planning Commission

Dear Jessica Metzger,

Our Sungate Ranch Community has been notified, regarding the proposed permitting of growing marijuana in our

surrounding neighborhoods. Besides Sungate Ranch, I would like to list all of the schools , etc., which can be located on

a large map, to best clarify effected areas to the commission. Please include: San Marcos High School, Hollister Elementary

School, El Camino Elementary School, Girls Inc, Salvation Army pre-school and after school care, Montessori future school

site, and The Episcopal Church. Our community of Sungate Ranch and some of the schools would share property lines

with pot-crops, if permitted. We propose the commission help us take care of our neighborhoods with all due respect to the

future generations of children in our Santa Barbara and Goleta environment. San Marcos Growers, Lane Farms and The

Orchard are just fine growing non polluting crops.

We are well aware, as you are, of all the negative forces the drug industry poses to our neighborhoods. No one wants pollution

of water and traffic or the criminal elements to further burden our police and hospitals. Our home values will plummet along

with the building of high fences, looking more like an industrial zone than a community. YES, not in my back yard. SB County

is a large area to seek out growing cannabis... not within an established community. The increase in tax revenue is just not

worth pollution of our homes, just as the decision was made not to pollute our ocean for gas and oil. Solutions between growers

of this recreational drug and the county need to be made in outback locations. Please do not succumb to the tax dollars proposed

by the mega marijuana growers industry. Be creative... there is a better way!

Thank you for your attention,

Bonnie Muench
Sungate Ranch

Metzger, Jessica

From: Bonnie Muench [bonniemuenchart@gmail.com]
Sent: Thursday, August 10, 2017 5:24 PM
To: Cannabis Info
Subject: No on cannabis permits along the Hollister Corridor

Attn: Jessica Metzger

Senior Planner
Long Range Planning
County of Santa Barbara
123 East Anapamu St.
Santa Barbara, CA 93101

Dear Jessica Metzger,

Please help to see that the committee of "2" ... holding secret and private meetings... will be stopped.

It's time to share information and ideas with the public (the people they work for). The plans being discussed

need to be public. The Hollister Corridor is in our county too... with communities, schools, organizations,

homes and businesses. For all concerned, time is overdue and now ideas on pot growing permits are

up for public input and review.

I encourage all of us, as citizens living and working in this most beautiful place, to do what we can to protect our

environment for the future of our children... just as we rallied to Save the Ocean. Are not the futures of our

children and grandchildren most important and not to be compromised for dollars and questionable revenue?

The news today informs us regarding the illegal influx of opioids on the market and certainly to affect prices

of man made pain (?) drugs. Why gamble investments by degrading communities on pot growers when there are

so many other solutions. Please do not overburden our police and hospital resources with the permitting of growing

cannabis in our midst.

Thank you for your time,

Bonnie Muench

From: Bruce Watkins <bwileywatkins@gmail.com>
Sent: Friday, July 28, 2017 7:20 AM
To: Metzger, Jessica
Subject: Reports from Bruce Watkins; email 1 of 3
Attachments: Geology and Aquifer Analysis Tepusquet Canyon.pdf

Jessica,

It was a pleasure meeting you last night, and thank you for providing me the proper email address to share this information with you. I had previously submitted this information to the email address "cannabisinfo@countyofsb.org"; and was surprised I had not received any acknowledgements.

16-1 I am sending you three emails this morning; this first one is the report on the local geology and subsurface aquifers of upper Tepusquet Canyon where our land is held. Another is in response to Tepusquet resident concerns expressed at the June 30 public hearing. The third is a presentation I had provided at an in-person meeting with Supervisor Lavagnino that I had with him on June 23. Due to the file sizes of these attachments, I'm sending this information as three separate emails.

I hope you will see from these that we are earnest in being strong, supportive members of the community. Please do not hesitate to contact me with questions, or let me know how I might assist the County now and in the future. With best regards,

Bruce Watkins
bwileywatkins@gmail.com
(m) 858.336.4324
www.linkedin.com/in/bwileywatkins

From: Bruce Watkins <bwileywatkins@gmail.com>
Sent: Friday, July 28, 2017 7:24 AM
To: Metzger, Jessica
Subject: Reports from Bruce Watkins; email 2 of 3
Attachments: 070717 Tepusquet Neighbor Concerns.pdf

Jessica,

In follow up to the email I just sent you, please find attached the second of three reports I had previously submitted to the email address "cannabisinfo@countyofsb.org".

The first email I just sent is the report on the local geology and subsurface aquifers of upper Tepusquet Canyon where our land is held. This report is in response to Tepusquet resident concerns expressed at the June 30 public hearing. The third and final email I will send you is a presentation I had provided at an in-person meeting with Supervisor Lavagnino that I had with him on June 23.

Again, due to the file sizes of these attachments, I'm sending this information as three separate emails. Thank you again for your consideration.

Bruce Watkins
bwileywatkins@gmail.com
(m) 858.336.4324
www.linkedin.com/in/bwileywatkins

From: Bruce Watkins <bwileywatkins@gmail.com>
Sent: Friday, July 28, 2017 7:31 AM
To: Metzger, Jessica
Subject: Reports from Bruce Watkins; email 3 of 3
Attachments: 062317 Intro Steve Lavagnino.pdf

Jessica,

In follow up to the two emails I just sent you, please find attached the final of three reports I had previously submitted.

This third and final email is a presentation I had provided at an in-person meeting with Supervisor Lavagnino that I had with him on June 23.

When you get a moment, please confirm with me that you received all three emails with their attachments from me so I'm not guessing whether these were received again.. :)

Thanks again for your consideration, and please do not hesitate to contact me if I may answer questions or be of further assistance.

Bruce Watkins
bwileywatkins@gmail.com
(m) 858.336.4324
www.linkedin.com/in/bwileywatkins

SUB-SURFACE GEOLOGY AND ACQUIFER ANALYSIS OF UPPER TEPUSQUET CANYON

Synopsis:

There is little scientific evidence to suggest cannabis cultivation in the higher altitudes of Tepusquet Canyon can meaningfully influence the water levels of Tepusquet creek or subterranean wells to the lower altitudes further south;

However

There is a strong body of scientific data to suggest deep wells into potential aquifers in the higher altitudes of Tepusquet are physically separated from Tepusquet Creek and the lower altitudes by the subterranean geology of the area. From this body of existing scientific data, it can be understood that the use of deep subterranean water wells for cannabis cultivation within California state cannabis regulations will not negatively impact water availability for Tepusquet residents.

Based on all of this scientific data, we applied for and drilled a permitted water well 500' into the bottom of the aquifer represented in attachment D (*syncline A2*), such that we tapped a clearly-identified, ten-year supply of water assuming no future rains over the next ten years - but that will predictably remain self-sustaining now and in the future assuming average annual rainfalls - and that is geologically isolated so it cannot flow north or south to impact water levels of Tepusquet Creek or other Tepusquet residents.

PREPARED FOR:

**Ad Hoc Subcommittee Regarding Cannabis Operations
in Unincorporated Santa Barbara County**

By:

Bruce Watkins
Ph: 858.336.4324
Email: bwileywatkins@me.com

July 2017

Sub-Surface Geology and Aquifer Analysis Upper Tepusquet Canyon

A. Report Summary:

Some residents of Tepusquet Canyon have expressed concern that deep wells drilled into properties located at the higher altitudes of Northern Tepusquet Canyon can deplete the waters of Tepusquet Creek, and water availability for residents along Tepusquet Road further to the south and at lower altitudes. While this may seem intuitive, the overwhelming body of scientific evidence and studies that have been performed in the area does not support this.

More specifically, this report and the attachments provided herewith overwhelmingly support that wells drilled into deep subterranean aquifers at the higher altitudes of northern Tepusquet cannot substantively impact the surface-level water of Tepusquet Creek, or any subterranean aquifers of residents at lower altitudes to the South. The waters of Tepusquet Creek are subject to depletion through evaporation and runoff to lower southern altitudes; not subterranean aquifer drilling. Where it relates to subterranean aquifers of residents further south, the documented geology of the region clearly shows potential aquifers at higher altitudes to the North are physically separated from potential aquifers at lower altitudes to the South by the documented geology of the area.

Over 2500 pages of research published between April 2015 and 1951 that specifically mention Tepusquet Canyon and Tepusquet Creek, were located and reviewed in the preparation of this report. Specific page numbers referencing Tepusquet are documented, and the publication name, publish dates, and authors are provided as Attachment A. Notably, although several deal with water flows, hydrology, sensitive species, precipitation and the geology of the Tepusquet area, there is no published science to support the assertion that drilling into northern Tepusquet aquifers effects the waters of Tepusquet Creek or aquifer levels further south on Tepusquet.

Conversely, a substantial body of scientific research exists from the US Geological Survey and nearby geologists that clearly show any potential subterranean aquifers run in a Northwest to Southeast direction that cross perpendicular to, not coincident with, the "North-South" surface topology of Tepusquet Creek. Moreover, at subterranean depths much below 20' where evaporation no longer occurs, it is not possible for these potential northern aquifers to re-supply Tepusquet creek at lower southern altitudes. The primary targeted aquifers exist at depths 200' to 500' below the surface, or deeper. A roughly parallel series of synclines and anticlines serves as a series of multiple physical geological barriers arranged from north to south that keeps aquifers at higher altitudes in the north from connecting water flow to potential aquifers at lower altitudes to the south along Tepusquet.

Finally, an analysis of one potential aquifer in the northern high altitudes of Tepusquet is paired with the water requirements of one intended cannabis cultivation submitted to the Santa Barbara County cannabis registry. This analysis supports that the geologically isolated aquifer can potentially support planned cultivation operations for ten years without replenishment by annual rainwater. There is little scientific evidence to suggest cannabis cultivation in the area can be a significant influence on the water levels of Tepusquet creek or subterranean water for Tepusquet residents.

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Sub-Surface Geology and Aquifer Analysis Upper Tepusquet Canyon

B. Review of Attachments:

Attachment A: Existing Published Research on Tepusquet Creek and Canyon:

Over 2500 pages of published data in nine separate publications published between April 2015 and 1951, and that specifically mention Tepusquet Canyon and Tepusquet Creek, have been located and reviewed. Specific page numbers referencing Tepusquet are documented, and the publication name, published dates, and authors are provided. Notably, although several deal with water flows, hydrology, sensitive species, precipitation and the geology of the Tepusquet area, not one analysis of the underlying geology of Tepusquet Canyon and its relationship to below-ground aquifer flow is discussed.

Attachment B: Geologic Map of Tepusquet Canyon and Manzanita Mtn. Quadrangles, California

Attachment B presents a detailed map by the US Geological Survey for Tepusquet Canyon, published 1964. On this map, Tepusquet Road is highlighted in yellow. The vicinity highlighted in orange is the highest elevation on Tepusquet Road. Tepusquet Creek flows downhill, in a North-to-South direction, alongside Tepusquet road from highest elevation to lowest elevation towards Sisquoc. The lines highlighted in pink show major fault, syncline and anticline formations. It can be seen that the pattern of faults, synclines and anticlines crosses Tepusquet road in a Northwest-to-Southeast direction.

Subterranean aquifers will follow the pattern of faults, synclines and anticlines. These have no correlation to the north-south surface level topography along which Tepusquet Creek flows. As can be easily seen, this implies that the availability of surface water in Tepusquet Creek has little correlation to potential subterranean aquifer flows along the faults and synclines beneath Tepusquet Creek. This is further reinforced by the geology presented in the following Attachments C and D.

Attachment C: Map of Synclines and Anticlines in Upper Tepusquet Relative to Tepusquet Creek

Attachment C is a Geological Foundation Map of the Tepusquet Canyon Quadrangle prepared by T.W. Dibblee Jr., published in 1994 for the US Geological Survey. It maps the pattern and slope of subterranean geological formations, synclines and anticlines in the area. Where bounded below by a geological formation through which water cannot permeate, a syncline will represent the deepest level of water in aquifer-bearing formations (*much like the bottom of a "water trough"*). An anticline can represent the highest level across which water cannot flow in the aquifer-bearing layer (*much like a "ridge"*); unless water levels are so high that water essentially "spills over" the anticline ridge. A geologic cross-section of such syncline trough and anticline ridges can be viewed in Attachment D as well.

In Attachment C, the orange highlighted lines show subterranean syncline troughs where aquifer waters will pool and collect, and the pink highlighted lines show subterranean anticline ridges that form physical geological barriers to water flow. The yellow line highlights Tepusquet Creek on the surface. "A" represents the beginning of a syncline that slopes generally in a subterranean Northwest direction from "A". "B" represents the beginning of another syncline to the south that slopes generally in a subterranean Southeast direction from "B". "C", "D", and "F" represent subterranean anticlines across which any subterranean aquifers found in "A" and "B" cannot generally flow in a North-South direction except in high-water conditions where the syncline aquifers might overflow. The anticlines are 200' to 500' above the synclines, meaning the aquifers can be 200' to 500' deep before waters can spill over the anticline ridges. "E" represents the northern end of Tepusquet creek during times of the year when it flows to the south along the surface. What this map shows is that water cannot flow from subterranean synclines in a southward direction to re-supply Tepusquet creek on the surface at depths above the anticlines (*which, in essence, can form a dam to block such water flows through the subterranean geology*).

The straight dotted-lines highlighted in Blue represent parcel boundaries for which cannabis cultivation registry submissions notifying the County of future intent to cultivate have been submitted. It can be seen from this that appropriately located deep subterranean wells can be located to tap synclines for cultivation water without impacting the surface-level flows of Tepusquet Creek.

Sub-Surface Geology and Aquifer Analysis Upper Tepusquet Canyon

Attachment D: Map of Subterranean Topology in Upper Tepusquet

Attachment D shows a vertical cross section of the depths at which the TM, TML, TMSS and KCSS lie relative to one another at subterranean depths, and is prepared by Cleath-Harris Geologists, Inc., of nearby San Luis Obispo, published in October, 2012.

What these show is that the "good aquifer" TM geology formation sits above the "impermeable" TML layer to a depth of approximately 200' to 500' below the surface. The impermeable TML formation is approximately 500' thick, before another "good aquifer candidate" layer of TMSS formation is reached. The TMSS layer is approximately 200' thick, below which another impermeable layer exists in the KCSS formation.

A1 represents the lowest elevation topography above the TM formation. A2 represents the syncline of the TM layer and corresponds to the "A" depicted on Attachment C. A3 represents the deeper syncline of the TML formation. These synclines can act as "troughs" into which water collects into subterranean aquifers. A4 represents the even deeper syncline of the TMSS formation. "F" represents the anticline of the TML formation depicted on Attachment C, also as "F", and serves as a "ridge barrier" to keep waters in the aquifer/syncline collects from flowing in a north/south direction.

An accurate interpretation of this geology is that the TM layer is water-bearing, and sits above the TML formation through which water cannot descend to deeper depths. As such, the A2 syncline represents the deepest subterranean aquifer level (*trough*) for the TM formation; approximately 200' to 500' below the surface. In addition, the TMSS formation represents another viable aquifer at its syncline, with access to surface-level rainwater captured further to the Southwest where the TMSS formation reaches the surface (*where-after water can drain and collect downwards towards the syncline trough*). As such, the A4 syncline represents the deepest subterranean level for the TMSS formation; approximately 1000' below the surface. This formation also sits atop another impermeable layer formed by the KCSS formation.

It can be seen that these deep synclines are bounded to the North and South by anticline formations through which water captured by the synclines at A2 and A4 cannot pass. As such, it can be seen that these formations cannot contribute meaningfully to the North-to-South flow of Tepusquet creek along the surface.

Attachment E: Northern High Altitude Aquifer Lifetime Analysis

This analysis presents an estimate of the reservoir size for the potential aquifer contained within the TM (*Monterey Formation, Siliceous Shale*) formation from Attachment D and the syncline represented as "A2"; and also represented as the "A" syncline in Attachment C. The potential aquifer in this TM formation sits above the impermeable TML formation. Also presented is an estimate of water usage associated with planned future cannabis cultivation as submitted to the Santa Barbara County cannabis cultivation registry. By comparing this potential reservoir aquifer water-bearing capacity with planned cultivation water usage, and estimate of the lifetime of the potential aquifer assuming no new rainwater replenishes the aquifer can be estimated. The table shows the lifetime of the reservoir aquifer - with no recharge from rain and with the cannabis cultivation projected - can be somewhere over 10 years.

Attachment A
Existing Published Research on Tepusquet Creek

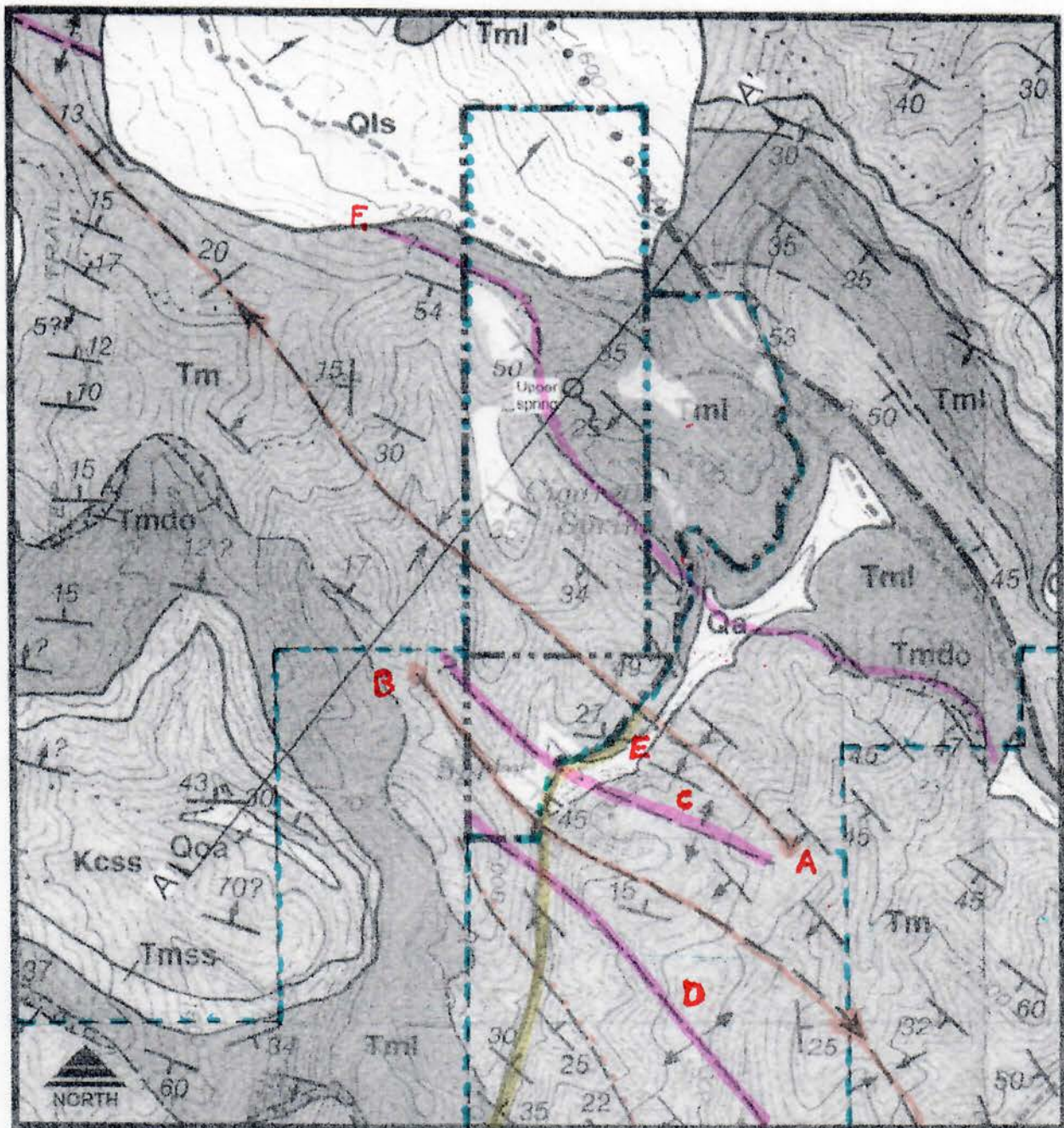
Over 2500 pages of published data in nine separate publications published between April 2015 and 1951, and that specifically deal with and mention Tepusquet Canyon and Tepusquet Creek, have been located and reviewed. Specific page numbers referencing Tepusquet are documented, and the publication name, published dates, and authors are provided. Notably, although several deal with water flows, hydrology, sensitive species, precipitation and the geology of the Tepusquet area, not one analysis of the underlying geology of Tepusquet Canyon and its relationship to below-ground aquifer flow is discussed.

1. Publication Name: 2014 Annual Report of Hydro-geologic Conditions, Water Requirements, Supplies and Disposition:
 - Published by: Santa Maria Valley Management Area
 - Publish Date: April 2015
 - Author(s): Luhdorff and Scalmanini; Consulting Engineers and Certified Hydrogeologists
 - Specific References to Tepusquet Creek: Pages 23, 24, 94, 112, 123 (*these are the .pdf document page numbers, not the actual numbered pages in the 142 page report*)
 - Synopsis:
 - At no point in this 142 page document is the underlying geology of Tepusquet Canyon and its relationship to below-ground aquifer flow discussed. Deals only with the measurement of surface level water flows of Tepusquet creek itself.
 - Discusses discharge of Tepusquet Creek and States Discharge of Tepusquet Creek hasn't been measured since the early 1980's (*page 23, 24*)
 - Recommends reactivation of stream gauges (*page 94, 112, 113, 123*)
 2. Publication Name: 2040 Santa Barbara County Regional Transportation Plan and Sustainable Communities Strategy, Final Environmental Impact Report
 - Published for: Santa Barbara County Association of Governments
 - Publish Date: July 2013
 - Author(s): Rincon Consultants, Inc.
 - Specific References to Tepusquet Creek: Pages 174, 175 (*these are the .pdf document page numbers, not the actual numbered pages in the 634 page report*)
 - Synopsis:
 - At no point in this 634 page document is the underlying geology of Tepusquet Canyon and its relationship to below-ground aquifer flow discussed. Deals only state and federally listed species considered to have potential to occur within Santa Barbara County and the vicinity of 2040 RTP-SCS construction projects.
 - More specifically; on page 175, *Table 4.3-1: Sensitive Communities and Critical Habitats Documented within Santa Barbara County* does not list Tepusquet as a community considered "Sensitive" by the California Department of Fish and Wildlife.
 3. Publication Name: Monitoring Program for the Santa Maria Valley Management Area
 - Published for: Superior Court of California, County of Santa Clara and Twitchell Management Authority
 - Publish Date: October 2008, with revisions April 2011 and April 2013.
 - Author(s): Luhdorff and Scalmanini; Consulting Engineers and Certified Hydrogeologists
 - Specific References to Tepusquet Creek: Pages 13, 14 and 24 (*these are the .pdf document page numbers, not the actual numbered pages in the 142 page report*)
 - Synopsis:
 - At no point in this 43 page document is the underlying geology of Tepusquet Canyon and its relationship to below-ground aquifer flow discussed. Deals only with the measurement of surface level water flows of Tepusquet creek itself.
 4. Publication Name: Biological Assessment for the Twitchell Dam Watercourse Project – APN 014-271-031 – Santa Maria, San Luis Obispo and Santa Barbara Counties, California
 - Published for: Santa Maria Valley Water Conservation District
 - Publish Date: September 2008
 - Author(s): Althouse and Meade, Inc., Biological and Environmental Services
 - Specific References to Tepusquet Creek: Page 44. (*this is the .pdf document page numbers, not the actual numbered page in the 97 page report*)
 - Synopsis:
 - At no point in this 97 page document is the underlying geology of Tepusquet Canyon and its relationship to below-ground aquifer flow discussed.
 - Deals only with the presence of the California (Silvery) Legless Lizard and notes that the closest reported occurrence of this species is at the confluence of Tepusquet Creek and the Sisquoc River, located at the very southern end of Tepusquet.
 5. Publication Name: Waste Discharge / Recycled Water Requirements: Order No. R3-2005-0014
 - Published for: City of Guadalupe Wastewater Facility; Santa Barbara County
 - Publish Date: September 2005
 - Author(s): Roger W. Briggs, Executive Officer and Robert A. Mulane; Planning Commission Secretary
-

Attachment A
Existing Published Research on Tepusquet Creek

- Specific References to Tepusquet Creek: Pages 309, 325, 326, 391, 410, 411, 421 (*these are the .pdf document page numbers, not the actual numbered pages in the 434 page report*)
 - Synopsis:
 - At no point in this 434 page document is the underlying geology of Tepusquet Canyon and its relationship to below-ground aquifer flow discussed. Deals only with the measurement of surface level water flows of Tepusquet creek itself.
6. Publication Name: *Sisquoc Steelhead Report Survey*
- Published by: Matt Stoecker and Jim Stoecker
 - Survey Publish Date: December 16, 2002
 - Specific References to Tepusquet Creek: Pages 62-65
 - Synopsis:
 - At no point in this document is the underlying geology of Tepusquet Canyon and its relationship to below-ground aquifer flow discussed. Deals only with the surface level topography and water flows of Tepusquet creek itself, and more specifically with the location of culverts and waterfalls that would impede the upstream migratory patterns of Steelhead Trout.
7. Publication Name: *Development of a Numerical Ground-Water Flow Model and Assessment of Ground-Water Basin Yield; Santa Maria Valley Ground-Water Basin*
- Published for: Santa Maria Valley Water Conservation District
 - Publish Date: March, 2000
 - Author(s): Luhdorff and Scalmanini; Consulting Engineers and Certified Hydrogeologists
 - Specific References to Tepusquet Creek: Pages 48, 50, 264, 280, 281, 346, 365, 366, 376 (*these are the .pdf document page numbers, not the actual numbered pages in the 480 page report*)
 - Synopsis:
 - At no point in this 480 page document is the underlying geology of Tepusquet Canyon and its relationship to below-ground aquifer flow discussed. Deals only with the measurement of surface level water flows of Tepusquet creek itself.
8. Publication Name: *Rainfall Analysis for Drainage Design, Volume II, Long-Duration Precipitation Frequency Data.*
- Published for: California Department of Water Resources
 - Publish Date: October, 1976
 - Author(s): J. D. Goodridge
 - Specific References to Tepusquet Creek: Pages 45 and 278 (*these are the .pdf document page numbers, not the actual numbered pages in the 412 page report*)
 - Synopsis:
 - At no point in this 412 page document is the underlying geology of Tepusquet Canyon and its relationship to below-ground aquifer flow discussed. Deals only with the measurement of rainfall near Tepusquet.
9. Publication Name: *Geology and Ground-Water Resources of the Santa Maria Valley Area, California*
- Published by: The United States Printing Office
 - Published Date: 1951
 - Author: G.F. Worts, Jr.
 - Specific References to Tepusquet: Found on Pages 10, 27, 37, 48, 58, 59, 62, 68 and 71-74 (*these are the .pdf document page numbers, not the actual numbered pages in the 169 page book*).
 - Synopsis:
 - At no point in this 175 page document is the underlying geology of Tepusquet Canyon and its relationship to below-ground aquifer flow discussed. Deals only with the surface level topography and water flows of Tepusquet creek itself.
 - Addresses surface level topography feeding into Sisquoc Creek (*page 28*)
 - Addresses creek-bed rock-types, (*page 48*)
 - Addresses measured stream flow/discharge and location of stream flow gauging stations (*page 58, 59, 62, 68, 71-74*)

Attachment C



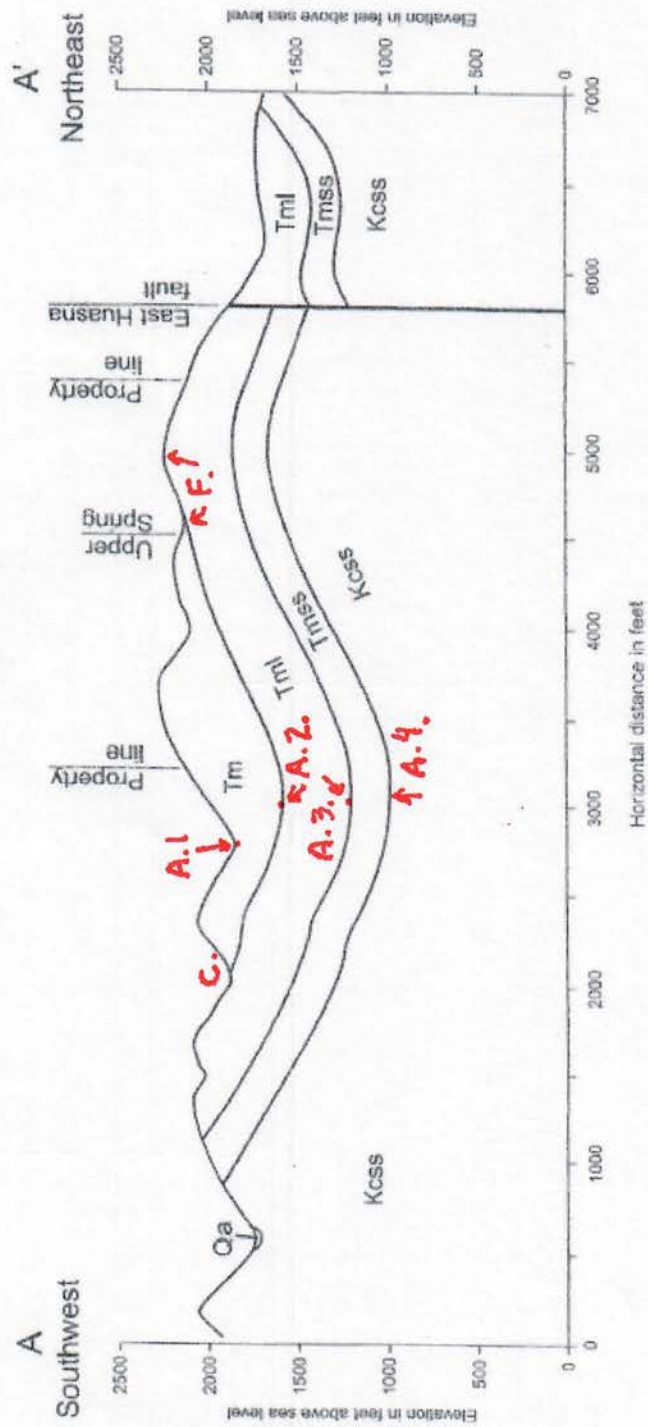
Base map: T. W. Dibblee, Jr., 1994,
Geologic Map of the Tepusquet Canyon Quadrangle,
Santa Barbara County, California
Dibblee Geological Foundation Map #DF-52

0 1000 2000
Scale: 1 inch = 1000 feet

Explanation	
Qa	Surficial sediments
Qls	Landslide debris
Qoa	Older surficial sediments
Tm	Monterey Fm. siliceous shale
Tmdo	Monterey Fm. dolomite
Tml	Monterey Fm. clay shale
Tmss	Sandstone of Hurricane Deck
Kcss	Cachuma Fm. hard sandstone
A — A' Cross section alignment (Figure 2)	
—	fault
50	contour
—	syncline
—	anticline
—	Dribble areas

Figure 1
Geologic Map
Emmett-Castor Properties
Tepusquet Canyon
Cleath-Harris Geologists, Inc.

Attachment D



Cross section alignment shown on Figure 1

Explanation

Qa	Surficial sediments
Tm	Monterey Fm. siliceous shale
Tmss	Monterey Fm. clay shale
Kc	Cachuma Fm. hard sandstone

Figure 2

Cross-Section A-A'
Emmett-Castor Properties
Tepusquet Canyon

Cleath-Harris Geologists

Attachment E
Northern Tepusquet High Altitude Aquifer Lifetime Analysis

This analysis presents an estimate of the reservoir size for the potential aquifer contained within the TM (*Monterey Formation, Siliceous Shale*) formation from Attachment D and the syncline represented as "A2"; and also represented as the "A" syncline in Attachment C. The potential aquifer in this TM formation sits above the impermeable TML formation. Also presented is an estimate of water usage associated with planned future cannabis cultivation as submitted to the Santa Barbara County cannabis cultivation registry. By comparing this potential reservoir aquifer water-bearing capacity with planned cultivation water usage, and estimate of the lifetime of the potential aquifer assuming no new rainwater replenishes the aquifer can be estimated.

It must be first shared and understood that this aquifer size and capacity is an estimate; the actual size and capacity are not truly known. Key assumptions used include the accuracy of the geology survey relative to what actually exists in the "real world", which can vary. As such, the width, depth, and length estimates can vary significantly – but as presented these are based on the apparent sizes of the potential TM aquifer depicted in attachments C, D, and E. Another key assumption is the "porosity" of the TM aquifer, where porosity is an estimate of how much space exists within the rock of the TM formation where water can collect. Where porosity is described, as well, it is probably better not to visualize the formation as a "sponge" where water can collect in a uniform fashion. Rather, aquifer waters are more likely to collect in cracks, fissures and seams throughout the formation; and any well drilled into the aquifer may involve a certain amount of luck to reach a water-bearing fissure within the aquifer zone, versus potentially missing any nearby water bearing seam or fissure by only a few feet.

That said, when looking at the drawing of Attachment D, the TM formation sits atop the TML formation, such that the TML formation can be thought of as "the bottom of a swimming pool". Rainwater that falls on the surface of the TM formation will drain downward through the formation until it reaches the "bottom of the pool" at the TM/TML boundary layer, and drain downward towards the bottom of the syncline represented at A2. When the "pool" fills enough such that the static water level (*the height of the water in the pool*) exceeds the height of A1 (*in Attachment D*), it will flow downhill as a surface level stream in A1 and/or C. Water cannot collect and rise above the anticlines represented at high points to the south of "C" and to the north of "F" on Attachment D, and so this is a good depiction of why waters potentially located in this aquifer cannot flow to the north or south in Tepusquet canyon.

Based on these assumptions, the table presented below and on the following page depicts the anticipated lifetime of this reservoir based on water consumption from the planned cannabis cultivation, assuming that no new rainwater falls on the surface of the TM formation shown in Attachments C, D and E. The table shows the lifetime of the reservoir aquifer - with no recharge from rain and with the cannabis cultivation projected - can be somewhere over 10 years.

Reservoir Size Estimate:

Item	Units	Notes
Reservoir Width	1500	Feet
Reservoir Depth	120	Feet (<i>Assume water table begins below the lowest surface represented by A2 in Attachment D</i>)
Reservoir Length	1500	Feet
Reservoir Size	270,000,000	Cubic Feet
Porosity	1.00%	% H2O Capacity, remaining 99% is rock
Reservoir Water	2,700,000	Cubic Feet of Water
Cubic Feet to Gallons	7.48	Conversion Ratio for Water; Cubic feet into Gallons
Reservoir Gallons	20,196,000	Gallons Water

Water Consumption Per Type 2B License

Item	Units	Notes
Maximum Flowering Plants	1,500	Harvest-Ready Adults; entire canopy
Harvest Pounds per Plant	0.5	Dry Flower Weight

Attachment E
Northern Tepusquet High Altitude Aquifer Lifetime Analysis

Gallons per pound dry flower	1.0	Per Day Peak Requirement, younger plants need less
Gallons per license per day	750	Peak daily water requirement assuming all plants at full size, Drip Irrigation and Covered Pots

Maximum Water Consumption and Reservoir Lifetime (without rain replenishment)

Item	Units	Notes
Maximum Type 2B Licenses	7	For this reservoir / location; assuming licenses granted
Maximum Gallons per Day	5,250	Gallons to supply 7 licenses, peak daily requirement
Days to Reservoir Depletion	3,847	Assuming no reservoir recharge
Years to Reservoir Depletion	10.5	Assuming no reservoir recharge from annual rains

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State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
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San Diego, CA 92123
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EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director



August 10, 2017

Jessica Metzger, Office of Planning and Research
Santa Barbara County
123 E. Anapamu Street
Santa Barbara, CA 93101
jmetzger@countyofsb.org

Subject: Comments on the Notice of Preparation for the Cannabis Land Use Ordinance and Licensing Program draft Environmental Impact Report, SCH No.2017071016

Dear Ms. Metzger:

The California Department of Fish and Wildlife (CDFW) has reviewed the Notice of Preparation (NOP) for the Cannabis Land Use Ordinance and Licensing Program for development of a draft Environmental Impact Report (DEIR). The Environmental Scoping Document (ESD) and draft Cannabis Land Use (CLU) Ordinance collectively, the Project (Project).

The proposed Project would amend both Santa Barbara County and Montecito Land Use and Development Code. The Santa Barbara County Coastal Zoning Ordinances (Ordinance). The ordinances amendments are specifically designated to regulate medicinal and non-medicinal cannabis activities. The Project also involves other amendments to the county code to establish a county licensing program for cannabis-related activities.

For California Environmental Quality Act (CEQA) purposes, the proposed Project includes future activities expected to be undertaken pursuant to the amended ordinances. Santa Barbara County had previously approved medicinal Cannabis use beginning in 2003 and up until 2016 when the Medicinal Cannabis Regulation and Safety Act (MRCSA), was enacted. In response, Santa Barbara County adopted ordinances banning both medicinal cannabis dispensaries and medicinal cannabis cultivation, except in few unincorporated areas of the County where cannabis-related activities were still allowed to operate.

Proposition 64 , Regulate and Tax Adult Use of Marijuana Act, “(also known as the Adult Use of Marijuana Act, or AUMA)” (ESD, page 4) establishes a comprehensive regulatory protocol for legalization of marijuana, its control, and specific regulation for cultivation, processing, manufacturing, distribution, testing, sale, tax, and growth of the industry. The AUMA also promulgates provisions for cultivation of industrial hemp. However, all these cannabis-related activities require state licensing by January 1, 2018.

The Project area encompasses all Santa Barbara County, including the coastal zone, approximately 1,779,619 acres. Excluded are land under the jurisdiction of incorporated cities, the federal government (Los Padres National Forest and Vandenberg Air Force Base, and the University of California at Santa Barbara (UCSB).

The draft CLU Ordinance, to be analyzed in the EIR, would allow types of cannabis activities by zone district within unincorporated Santa Barbara County, as described below:

Conserving California's Wildlife Since 1870

- Allow cultivation of cannabis in Agricultural I (AG-I), Agricultural II (AG-II), Industrial Research Park (M-RP), Light Industry (M-1), and General Industry (M-2) zone districts;
- Allow manufacturing of non-volatile extraction in Agricultural I (AG-I), Agricultural II (AG-II), Limited Commercial (C-1), Retail Commercial (C-2), General Commercial (C-3), Community Mixed Use - Los Alamos (CM-LA), Service Commercial (SC), Mixed Use (MU), Industrial Research Park (M-RP), Light Industry (M-1), and General Industry (M-2) zone districts;
- Allow manufacturing of volatile extraction in Agricultural II (AG-II), Light Industry (M-1), and General Industry (M-2) zone districts;
- Allow post-processing and packaging in Agricultural I (AG-I), Agricultural II (AG-II), Limited Commercial (C-1), Retail Commercial (C-2), General Commercial (C-3), Community Mixed Use - Los Alamos (CM-LA), Service Commercial (SC), Mixed Use (MU), Industrial Research Park (M-RP), Light Industry (M-1), and General Industry (M-2);
- Allow testing in General Commercial (C-3), Community Mixed Use - Los Alamos (CM-LA), Service Commercial (SC), Mixed Use (MU), Industrial Research Park (M-RP), Light Industry (M-1), General Industry (M-2), and Professional and Institutional (PI);
- Allow commercial retail sales in Limited Commercial (C-1), Retail Commercial (C-2), General Commercial (C-3), Service Commercial (SC), Mixed Use (MU), and Light Industry (M-1) zone districts;
- Allow wholesale commercial sales in General Commercial (C-3), Industrial Research Park (M-RP), Light Industry (M-1), and General Industry (M-2), and;
- Prohibit cannabis activities in all other zone districts including all Residential, Mountainous Areas, Highway Commercial (CH), Resort/Visitor Serving Commercial (C-V), Coastal Dependent Industry (M-CD), Coastal Related Industry (M-CR), Public Works Utilities and Private Service Facilities (PU), Recreation District (REC), Resource Management (RES), and Transportation Corridor (TC) zone districts. (Environmental Scoping Document, 2017)

The CDFW recognizes that the Lead Agency will need to analyze and determine if the Project, once implemented, may result in potentially significant impacts to native vegetation (habitat), biological resources, and special status plant and wildlife species. Project analysis should also consider the Project's impacts on a project-specific and cumulative effects basis.

The following comments and recommendations have been prepared pursuant to the Department's authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code § 2050 *et seq.*) and Fish and Game Code section 1600 *et seq.*, and pursuant to our authority as Trustee Agency with jurisdiction over natural resources affected by the Project (California Environmental Quality Act, [CEQA] Guidelines § 15386) to assist the Lead Agency in avoiding or minimizing potential Project impacts on biological resources.

Specific Comments

In particular, CDFW has three primary concerns addressing marijuana cultivation: 1) Land conversion, 2) Water supply, and 3) Pesticide use. This letter is to provide early guidance to assist the Lead Agency and the Project biologists regarding our concerns and recommended Project avoidance, minimization, and compensation measures to be included in the DEIR as enforceable mitigation measures.

Monarch (*Danaus plexippus plexippus*) and La Purisima blue (*Philotiella speciose purisima*) Butterfly

These locally rare butterflies occur in both cool riparian corridor systems and open spaces grasslands of the Project area. Both species have a plant obligate relationship; and could be harmed directly by either pesticide or herbicide applications. Pesticide and herbicide restrictions should be closely restricted and closely monitored for CLU licensing permitting purposes. A Project wide Integrated Pest Management Plan should be developed to ensure protection of the Monarch and La Purisima blue butterfly, both of which are imperiled.

California tiger salamander (*Ambystoma californiense*)

The California tiger salamander is an endemic amphibian in Santa Barbara County and are listed as federally and state endangered. Maintaining critical habitat and migration corridors should be paramount in developing CLU locations for Project(s) in unincorporated Santa Barbara County, as very few intact breeding ponds and upland hibernation habitat and movement corridors remain for this critically imperiled species.

Red-legged frog (*Rana draytonii*)

Red-legged frog is listed as federally threatened and is protected by federal and California Species of Special Concern. The main cause of the population decline is habitat loss and destruction, but introduced predatory species, such as American bullfrogs, are also a factor. Remnant populations of this species occur throughout the Project area and should be given special protection under the new ordinance when they are considered.

Blunt-nosed Leopard Lizard (*Gambelia sila*)

Blunt-nosed Leopard Lizard is known to occupy habitat within the Project area, which includes core habitat areas important for the species' continued existence. Blunt-nosed Leopard Lizard is fully protected, therefore, CDFW cannot authorize take of the species and full avoidance is required. BNLL protocol surveys are recommended if ground or vegetation disturbing activities will lead to habitat removal and if maintenance or other activities are to occur in suitable habitat. Suitable BNLL habitat includes all areas of grassland and shrub habitat in the San Joaquin Valley and the northern tip of Santa Barbara County that contains required habitat elements, such as small mammal burrows. BNLL are also known to utilize open space patches between suitable habitats including disturbed sites and unpaved access roadways.

To observe avoidance of BNLL, focused surveys following the 2004 survey methodology titled "Approved Survey Methodology for the Blunt-nosed Leopard Lizard", which was developed by CDFW, is recommended. These surveys, the parameters of which were designed to optimize

detectability, must be conducted to reasonably assure CDFW that take of this fully protected species will not occur as a result of project implementations. It is important to note that protocol level surveys must be conducted on multiple dates during late spring, summer, and fall and that within these time periods there are specific date, temperature, and time parameters which must be adhered to; as a result, protocol level surveys for this species are not synonymous with 30-day "pre-construction" surveys often recommended for other wildlife species.

In addition, CDFW advises that all potential burrows, which could be occupied by BNLL, and all individuals observed above-ground, be avoided. CDFW also recommends that in all areas where ground disturbing project activities would occur, suitable burrows within and adjacent to potential habitat for BNLL be avoided by a minimum 50 feet; that an appropriate number of qualified biologists be present during all ground disturbing project activities to ensure that BNLL above ground are not impacted; and that any individual that may enter a project activity area be allowed to leave unobstructed on its own.

Southern Steelhead Trout (*Oncorhynchus mykiss*)

It is anticipated that steelhead may potentially be impacted by the CLU in the Project area. All licensing permitting should specify and strictly regulate activity in critical habitat for steelhead. All permitted activities should be allowed to take place only when there is no flow present in identified critical habitat steelhead streams. If it becomes necessary to permit CLU Projects in the Project area to work in a wetted portion of any stream between October 31st and June 15th in anadromous waters, a provision should be included in licensing language that requires CLU permittees to notify the CDFW via phone or email prior to work.

Tidewater Goby (*Eucyclogobius newberryi*)

Tidewater goby is native to lagoons of streams along the coast of California. A fisheries biologist should sample in areas of ponded water in the Project area where there are stands of cattail or bulrush that may be required for removal prior to impacts. Specifically sampling for tidewater goby, a CDFW species of special concern, should follow survey techniques approved by the U.S. Fish and Wildlife Service. Any variations from these techniques should be approved by the U.S. Fish and Wildlife Service. The fishery biologist should have the required federal permits for sampling for a federally endangered species.

Swainson's hawk (*Buteo jamaicensis*)

The Project area includes areas of Swainson's hawk habitat, including nesting trees and foraging habitat. To avoid impacts to the species, CDFW recommends that surveys be conducted for projects that would impact potential habitat, following the survey methodology developed by the Swainson's Hawk Technical Advisory Committee (SWHA TAC, 2000), prior to any ground disturbance. These surveys, the parameters of which were designed to optimize detectability, must be conducted to reasonably assure CDFW that take of this species will not occur as a result of disturbance associated with Project activities. In the event that this species is detected during protocol-level surveys, consultation with CDFW is warranted to discuss how to implement proposed projects and avoid take, or if avoidance is not feasible, to acquire a California Endangered Species Act (CESA) Incidental Take Permit (ITP) prior to any ground disturbing activities.

Removal of mature trees is a potentially significant impact to nesting raptors that warrants compensatory mitigation and may be in violation of Fish and Game Code. CDFW considers removal of known raptor nest trees, even outside of the nesting season, to be a significant impact under CEQA, and, in the case of Swainson's hawk, it could also result in take under CESA. This is especially true with species such as Swainson's hawk that exhibit high site fidelity to their nest and nest trees year after year. Regardless of nesting status, CDFW recommends that trees that must be removed be replaced with an appropriate native tree species planting at a ratio of 3:1 in an area that will be protected in perpetuity. This mitigation is needed to offset potential impacts to the loss of potential nesting habitat.

Swainson's hawks generally forage within 10 miles of their nest tree. CDFW's Staff Report Regarding Mitigation for Impacts to Swainson's Hawks (CDFG, 1994) recommends the following:

- Projects within 1 mile of an active nest tree to provide a minimum of one acre of habitat management (HM) land for each acre of development authorized.
- Projects within 5 miles of an active nest but greater than 1 mile to provide a minimum of 0.75 acres of HM land for each acre of urban development authorized.
- Projects within 10 miles of an active nest tree but greater than 5 mile from an active nest tree to provide a minimum of 0.5 acres of HM land for each acre of urban development authorized.

Funding of a sufficient long-term endowment for the management of the protected properties should be paid by the Project sponsors. In addition to fee title acquisition of grassland habitat, mitigation could occur by the purchase of conservation or suitable agricultural easements. Suitable agricultural easements would include areas limited to production of crops such as alfalfa, dry land and irrigated pasture, and cereal grain crops. Vineyards, orchards, cotton fields, and other dense vegetation do not provide adequate foraging habitat.

Coastal California Gnatcatcher, Coastal Cactus Wren, and Least Bell's Vireo

Coastal California gnatcatcher (*Polioptila californica californica*) is a federally endangered species and a California SSC; coastal cactus wren (*Campylorhynchus brunneicapillus*) is a California SSC; least Bell's vireo (*Vireo bellii pusillus*), is a federally and state threatened species. The coastal California gnatcatcher and coastal cactus wren use coastal sage scrub and cactus scrub habitats and are known to occur in close proximity to the Project area, if not within the Project area, as cactus scrub habitat has become more widely disbursed along the coastal range with changing climate. The least Bell's vireo uses riparian habitat, which occurs throughout the (Project area). CDFW recommends completing surveys for these species to better inform the Project's potential impacts prior to the circulation of the DEIR document. The results of the surveys may influence the mitigation measures ultimately adopted within the final CEQA document. Survey protocol and guidelines for coastal California gnatcatcher and least Bell's vireo can be found at <https://www.wildlife.ca.gov/Conservation/Survey-Protocols>.

Burrowing Owl (*Athene cunicularia*) (SSC)

Burrowing owl is a California SSC known to occupy habitat within the Project area. To avoid impacts to the species, we recommend that focused surveys be conducted following the survey methodology developed by the California Burrowing Owl Consortium (CBOC, 1993) and the

CDFW's "Staff Report on Burrowing Owl Mitigation" (CDFG 2012) (Staff Report). These documents are considered the best methodologies currently available. Surveys should be conducted well in advance of any ground disturbance or other project-related activities including other survey efforts where potential habitat could be impacted.

If any ground disturbing activities will occur during the burrowing owl nesting season (approximately February 1 through August 31), and potential burrowing owl burrows are present within the Project footprint, implementation of avoidance measures are warranted. In the event that burrowing owls are found, the Staff Report recommends that impacts to occupied burrows be avoided by implementation of no-disturbance buffer zones (specified in the table below), unless a qualified biologist approved by CDFW verifies through non-invasive methods that either: 1) the birds have not begun egg laying and incubation; or 2) that juveniles from the occupied burrows are foraging independently and are capable of independent survival.

Location	Time of Year	Level of Disturbance		
		Low	Med	High
Nesting sites	April 1-Aug 15	200 m*	500 m	500 m
Nesting sites	Aug 16-Oct 15	200 m	200 m	500 m
Nesting sites	Oct 16-Mar 31	50 m	100 m	500 m

* meters (m)

Failure to implement the recommended buffer zones could cause adult burrowing owls to abandon the nest, cause eggs or young to be directly impacted (crushed), and/or result in reproductive failure, in violation of Fish and Game Code and the Migratory Bird Treaty Act.

CDFW recommends that the DEIR describe all avoidance measures that would be employed in the event that owls are found on the Project site, as well as methods that would be used to evict owls from burrows (including passive relocation during the non-breeding season). We also recommend that the DEIR specify how the impact of evicting owls would be mitigated to a less than significant level. The Staff Report recommends that foraging habitat be acquired and permanently protected to offset the loss of foraging and burrow habitat. The CDFW also recommends replacement of occupied burrows with artificial burrows at a ratio of one burrow collapsed to one artificial burrow constructed (1:1) as mitigation for the potentially significant impact of evicting a burrowing owl.

Mountain Lion (*Puma Concolor*)

The Mountain is a fully protected species with known ranges throughout most of the Project area. Secondary poisoning from rodenticides is a major concern to CDFW for all animals in the Project area; but especially carnivores. There seems to be a link between secondary poisoning and mange in mountain lions and coyotes, most likely because of a reduced immune system due to the poison affecting the normal physiological functions of the animal making them more susceptible to other diseases. The United States Environmental Protection Agency (U.S. EPA) regulates pesticides at the federal level and the California CDFW of Pesticide Regulation (DPR) regulates pesticides on the state level. There are currently no pesticides registered specifically for use directly on marijuana. Based on DPR guidance, the only pesticide products not illegal to use on marijuana are those that contain an active ingredient that is exempt from residue-

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tolerance requirements and (1) registered and labeled for use that is broad enough to include use on marijuana (e.g. unspecified green plants) or (2) exempt from registration requirements as a minimum risk pesticide under Federal Insecticide, Fungicide, and Rodenticide Act section 25(b) and 3 California Code of Regulations § 6147. Refer to DPR for additional pesticide regulations. Increased anticoagulant rodenticide use has been noted by CDFW staff in clandestine marijuana cultivation sites throughout the state. CDFW recommends that the DEIR address the use of pesticides, including but not limited to the risk of secondary poisoning to native species caused by the use of rodenticides. CDFW also advises limiting grow site selection criteria to preclude cultivation in or next to special status species habitat.

California sea otter (*Enhydra lutris*)

Coastal areas in the Project area (offshore) are known to occupy habitat and have known occurrences of the highly imperiled California sea otter. The California sea otter is protected under Title 14, California Code of Regulations, Section 460, which prohibits take of the species at any time. CDFW recommends that the avoidance measures within the USFWS “Standardized recommendations for protection of and prior to or during ground disturbance” (2011) be followed and that surveys be conducted accordingly and prior to commencing any Project-related ground-disturbing activities. If any active or potential are found Project-related site activities could create deleterious runoff into the Pacific Ocean near known locations of otter occurrences throughout the coastal zone of the known Project area, consultation with the CDFW Marine Region would be warranted for guidance on take avoidance measures for the California sea otter.

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Special Status Bat Species

Bats are known to occupy various roosting habitats available within the Project area. Known roosting habitats include mines, caves, rocky outcrops, bridges, trees, and buildings that provide the required localized climatic conditions and surrounding foraging opportunities needed. In some cases, multiple bat species can co-occur in roosts and they may have similar life histories, although it is important to note that in many instances bat species do not have the same habitat requirements and life histories. For instance, migratory patterns and winter roosts can vary significantly from species to species.

To minimize potential Project-related impacts to special status bat species, CDFW recommends that if any of the above listed roosting habitat elements are located within a project's impact area that a reconnaissance survey be conducted by a qualified wildlife biologist to determine if bats are currently or could utilize the potential roosting habitat onsite. If a potential roosting site is confirmed to support bat species with 100 feet of ground disturbing activities, CDFW recommends that the project proponent conduct focused surveys to establish species usage and seasonal usage. Focused survey methodology is advised to include visual surveys of bats (observation of presence of bats during foraging period), inspection for suitable habitat or bat sign (*guano*), and use of ultrasonic detectors (*Anabat*, *Sonobat*, etc.) during all dusk emergence and pre-dawn re-entry. To maximize detectability, each survey needs to be conducted within one 24-hour period.

If bats are found to occupy a project site, CDFW recommends the project proponent implement the general bat avoidance, minimization and compensatory mitigation measures. These measures include but are not limited to establishing a 100-foot no-disturbance buffer around

roost sites and installing new roost sites to be in place prior to the initiation of Project related activities to allow enough time for bats to relocate.

Special Status Plant Species (SSC) Potentially Occurring in the Project area

Multiple special status plant species are known to occur within the Project area, and for many plant species, the Project area encompasses the only known existing populations. CDFW recommends that project sites are surveyed for special status plants by a qualified botanist following the "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities" (November 24, 2009). Additionally, A Manual of California Vegetation, Second Edition, and URL: <http://vegetation.cnps.org/> are useful tools intended to maximize detectability, includes the identification of reference populations to facilitate the likelihood of field investigations occurring during the appropriate floristic period.

In the absence of protocol-level surveys being performed, additional surveys may be necessary. Further, avoidance of special status plant species is recommended whenever possible by delineation and observing a minimum no-disturbance buffer of at least 50 feet, however a 300-foot buffer is recommended from the outer edge of the plant population(s) or specific habitat type(s) required by special status plant species. If buffers cannot be maintained, then consultation with CDFW may be warranted to determine appropriate minimization and mitigation measures for impacts to special status plant species. If a State- or federally listed plant species are identified during botanical surveys, it is recommended consultation with CDFW and/or USFWS should be conducted to determine the need for an ITP.

In addition to a Project-related species analysis, CDFW recommends analyzing impacts to the following rare natural communities including, but not limited to, freshwater marsh, black cottonwood riparian forest, La Purisima Manzanita, stabilized strand dunes, valley needlegrass grassland, valley oak woodland, box elder riparian, valley saltbush scrub, Venturan coastal sage scrub. Known locations of these rare natural communities in Santa Barbara County are mapped in the California Natural Diversity Database (CNDDDB). It is important to note that the CNDDDB is a positive detection database. Records in the database exist only where species and rare natural communities have been recorded. There is a bias in the CNDDDB towards locations that have had more development pressures, and thus more biological survey work has been completed and evaluated. Places that have limited information in the CNDDDB often signify that little survey work has been conducted in that location.

Water Use

Water use estimates for marijuana plants are not well established in literature and however, early estimates show cannabis cultivation requires an average of one gallon of water per day per pound of cannabis produced or 6 gallons per plant per day (<http://cannabishelpnw.com/irrigating-marijuana-with-rainwater/>, <https://www.marijuanaventure.com/report-on-water-usage/>). Based on research and observations made by CDFW in northern California, marijuana grow sites have significantly impacted streams through water diversions resulting in reduced flows and dewatered streams (Bauer, S. et al. 2015). Groundwater use for clandestine marijuana cultivation activities have resulted in lowering the groundwater water table and have affected water supplies to streams in northern California.

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CDFW is concerned the Project may result in a long-term cumulative impact with a continued decline of groundwater in Santa Barbara County resulting in further decline of biological resources that depend on groundwater availability. Additional groundwater use may lower the groundwater table, which could eliminate flows or flow duration in drainages and the occurrence and persistence of wetlands. Lowering of the water table can also take water beyond the root zone resulting in mortality and decline of vegetation and reductions in wildlife populations. The Project could substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of preexisting nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted). The Department recommends the lead agency describe groundwater extraction and recharge measures that will assure that the Project's use of groundwater will not further result in subsidence of the groundwater table.

General Comments

- 1) Project Description and Alternatives. To enable CDFW to adequately review and comment on the proposed project from the standpoint of the protection of plants, fish, and wildlife, we recommend the following information be included in the DEIR:
 - a) A complete discussion of the purpose and need for, and description of, the proposed project, including all staging areas and access routes to the construction and staging areas; and,
 - b) A range of feasible alternatives to project component location and design features to ensure that alternatives to the proposed project are fully considered and evaluated. The alternatives should avoid or otherwise minimize direct and indirect impacts to sensitive biological resources and wildlife movement areas.

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- 2) Lake and Streambed Alteration Agreements (LSA). As a Responsible Agency under CEQA Guidelines section 15381, CDFW has authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (including vegetation associated with the stream or lake) of a river or stream, or use material from a streambed. For any such activities, the project applicant (or "entity") must provide written notification to CDFW pursuant to section 1600 *et seq.* of the Fish and Game Code. Based on this notification and other information, CDFW determines whether a Lake and Streambed Alteration Agreement (LSA) with the applicant is required prior to conducting the proposed activities. CDFW's issuance of a LSA for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the Negative Declaration or Environmental Impact Report of the local jurisdiction (Lead Agency) for the project. To minimize additional requirements by CDFW pursuant to section 1600 *et seq.* and/or under CEQA, the document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA.¹

¹ A notification package for a LSA may be obtained by accessing the Department's web site at www.wildlife.ca.gov/habcon/1600.

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- a) The Project area supports aquatic, riparian, and wetland habitats; therefore, a preliminary jurisdictional delineation of the streams and their associated riparian habitats should be included in the DEIR. The delineation should be conducted pursuant to the U. S. Fish, Wildlife Service wetland definition adopted by CDFW is some wetland, and riparian habitats subject to CDFW's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers' Section 404 permit and Regional Water Quality Control Board Section 401 Certification.
- b) In Project areas which may support ephemeral streams, herbaceous vegetation, woody vegetation, and woodlands also serve to protect the integrity of ephemeral channels and help maintain natural sedimentation processes; therefore, CDFW recommends effective setbacks be established to maintain appropriately-sized vegetated buffer areas adjoining ephemeral drainages.

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- c) Project-related changes in drainage patterns, runoff, and sedimentation should be included and evaluated in the environmental document.

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- 3) Wetlands Resources. CDFW, as described in Fish & Game Code § 703(a) is guided by the Fish and Game Commission's policies. The Wetlands Resources policy (<http://www.fgc.ca.gov/policy/>) of the Fish and Game Commission "...seek[s] to provide for the protection, preservation, restoration, enhancement and expansion of wetland habitat in California. Further, it is the policy of the Fish and Game Commission to strongly discourage development in or conversion of wetlands. It opposes, consistent with its legal authority, any development or conversion which would result in a reduction of wetland acreage or wetland habitat values. To that end, the Commission opposes wetland development proposals unless, at a minimum, project mitigation assures there will be "no net loss" of either wetland habitat values or acreage. The Commission strongly prefers mitigation which would achieve expansion of wetland acreage and enhancement of wetland habitat values".
 - a) The Wetlands Resources policy provides a framework for maintaining wetland resources and establishes mitigation guidance. CDFW encourages avoidance of wetland resources as a primary mitigation measure and discourages the development or type conversion of wetlands to uplands. CDFW encourages activities that would avoid the reduction of wetland acreage, function, or habitat values. Once avoidance and minimization measures have been exhausted, the project must include mitigation measures to assure a "no net loss" of either wetland habitat values, or acreage, for unavoidable impacts to wetland resources. Conversions include, but are not limited to, conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks, which preserve the riparian and aquatic values and functions for the benefit to on-site and off-site wildlife populations. CDFW recommends mitigation measures to compensate for unavoidable impacts be included in the DEIR and these measures should compensate for the loss of function and value.
 - b) The Fish and Game Commission's Water policy guides the CDFW to ensure the quantity and quality of the waters of this state should be apportioned and maintained respectively so as to produce and sustain maximum numbers of fish and wildlife; to provide maximum protection and enhancement of fish and wildlife and their habitat; encourage

and support programs to maintain or restore a high quality of the waters of this state, and prevent the degradation thereof caused by pollution and contamination; and endeavor to keep as much water as possible open and accessible to the public for the use and enjoyment of fish and wildlife. CDFW recommends avoidance of water practices and structures that use excessive amounts of water, and minimization of impacts that negatively affect water quality, to the extent feasible.

- 4) California Endangered Species Act (CESA). CDFW considers adverse impacts to a species protected by CESA, for the purposes of CEQA, to be significant without mitigation. As to CESA, take of any endangered, threatened, candidate species, or state-listed rare plant species that results from the Project is prohibited, except as authorized by state law (Fish and Game Code, §§ 2080, 2085; Cal. Code Regs., tit. 14, §786.9). Consequently, if the Project, Project construction, or any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from CDFW may include an Incidental Take Permit (ITP) or a consistency determination in certain circumstances, among other options (Fish and Game Code §§ 2080.1, 2081, subds. (b), (c)). Early consultation is encouraged, as significant modification to a Project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.
- 5) Biological Baseline Assessment. To provide a complete assessment of the flora and fauna within and adjacent to the Project area, with particular emphasis upon identifying endangered, threatened, sensitive, regionally and locally unique species, and sensitive habitats, the DEIR should include the following information:
- a) Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region (CEQA Guidelines § 15125[c]);
 - b) A thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (see <http://www.dfg.ca.gov/habcon/plant/>);
 - c) Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at the project site and within the neighboring vicinity. *The Manual of California Vegetation*, second edition, should also be used to inform this

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mapping and assessment (Sawyer et al. 2008³). Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions;

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- d) A complete, recent, assessment of the biological resources associated with each habitat type on site and within adjacent areas that could also be affected by the project. CDFW's California Natural Diversity Data Base (CNDDB) in Sacramento should be contacted to obtain current information on any previously reported sensitive species and habitat. CDFW recommends that CNDDB Field Survey Forms be completed and submitted to CNDDB to document survey results. Online forms can be obtained and submitted at http://www.dfg.ca.gov/biogeodata/cnddb/submitting_data_to_cnddb.asp;
 - e) A complete, recent, assessment of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect, including California Species of Special Concern (CSSC) and California Fully Protected Species (Fish and Game Code § 3511). Species to be addressed should include all those which meet the CEQA definition (see CEQA Guidelines § 15380). Seasonal variations in use of the Project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service; and,
 - f) A recent, wildlife and rare plant survey. CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed project may warrant periodic updated surveys for certain sensitive taxa, particularly if build out could occur over a protracted period, or in phases.
- 6) Biological Direct, Indirect, and Cumulative Impacts. To provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts, the following should be addressed in the DEIR:
- a) A discussion of potential adverse impacts from lighting, noise, human activity, exotic species, and drainage. The latter subject should address project-related changes on drainage patterns and downstream of the project site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the

³Sawyer, J. O., Keeler-Wolf, T., and Evens J.M. 2008. A manual of California Vegetation, 2nd ed.

project site. The discussion should also address the proximity of the extraction activities to the water table, whether dewatering would be necessary and the potential resulting impacts on the habitat, if any, supported by the groundwater. Mitigation measures proposed to alleviate such impacts should be included;

- b) A discussion regarding indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a NCCP). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DEIR;
- c) The impacts of zoning of areas for development projects or other uses nearby or adjacent to natural areas, which may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the environmental document; and,
- d) A cumulative effects analysis, as described under CEQA Guidelines section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

- 7) Avoidance, Minimization, and Mitigation for Sensitive Plants. The DEIR should include measures to fully avoid and otherwise protect sensitive plant communities from Project-related direct and indirect impacts. CDFW considers these communities to be imperiled habitats having both local and regional significance. Plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3 and S-4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by querying the CNDDDB and are included in *The Manual of California Vegetation* (Sawyer et al. 2008).
- 8) Compensatory Mitigation. The DEIR should include mitigation measures for adverse Project-related impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.
- 9) Long-Term Management of Mitigation Lands. For proposed preservation and/or restoration, the DEIR should include measures to protect the targeted habitat values from direct and indirect negative impacts in perpetuity. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include, but are not limited to, restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, and increased human intrusion. An appropriate non-wasting endowment should be set aside to provide for long-term management of mitigation lands.

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- 10) Nesting Birds. CDFW recommends that measures be taken to avoid Project impacts to nesting birds. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Title 50, § 10.13, Code of Federal Regulations). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). Proposed Project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of the avian breeding season which generally runs from February 1 through September 1 (as early as January 1 for some raptors) to avoid take of birds or their eggs. If avoidance of the avian breeding season is not feasible, CDFW recommends surveys by a qualified biologist with experience in conducting breeding bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.
- 11) Translocation/Salvage of Plants and Animal Species. Translocation and transplantation is the process of moving an individual from the Project site and permanently moving it to a new location. CDFW generally does not support the use of, translocation or transplantation as the primary mitigation strategy for unavoidable impacts to rare, threatened, or endangered plant or animal species. Studies have shown that these efforts are experimental and the outcome unreliable. CDFW has found that permanent preservation and management of habitat capable of supporting these species is often a more effective long-term strategy for conserving sensitive plants and animals, and their habitats.
- 12) Moving out of Harm's Way. The proposed Project is anticipated to result in clearing of natural habitats that support many species of indigenous wildlife. To avoid direct mortality, CDFW recommends a qualified biological monitor approved by CDFW be on site prior to and during ground and habitat disturbing activities to move out of harm's way special status species or other wildlife of low mobility that would be injured or killed by grubbing or Project-related construction activities. It should be noted that the temporary relocation of on-site wildlife does not constitute effective mitigation for the purposes of offsetting project impacts associated with habitat loss.
- 13) Wildlife Movement and Connectivity. The Project area supports significant biological resources and is located adjacent to a regional wildlife movement corridor. The Project area contains habitat connections and supports movement across the broader landscape, sustaining both transitory and permanent wildlife populations. Onsite features, which contribute to habitat connectivity, should be evaluated and maintained. Aspects of the Project could create physical barriers to wildlife movement from direct or indirect project-related activities. Indirect impacts from lighting, noise, dust, and increased human activity may displace wildlife in the general area.
- 14) Revegetation/Restoration Plan. Plans for restoration and re-vegetation should be prepared by persons with expertise in southern California ecosystems and native plant restoration techniques. Plans should identify the assumptions used to develop the proposed restoration strategy. Each plan should include, at a minimum: (a) the location of restoration sites and

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assessment of appropriate reference sites; (b) the plant species to be used, sources of local propagules, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) a local seed and cuttings and planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity. Monitoring of restoration areas should extend across a sufficient period to ensure that the new habitat is established, self-sustaining, and capable of surviving drought.

a) CDFW recommends that local onsite propagules from the Project area and nearby vicinity be collected and used for restoration purposes. Onsite seed collection should be initiated in the near future in order to accumulate sufficient propagule material for subsequent use in future years. Onsite vegetation mapping at the alliance and/or association level should be used to develop appropriate restoration goals and local plant palettes. Reference areas should be identified to help guide restoration efforts. Specific restoration plans should be developed for various Project components as appropriate.

b) Restoration objectives should include providing special habitat elements where feasible to benefit key wildlife species. These physical and biological features can include, for example, retention of woody material, logs, snags, rocks and brush piles (see Mayer and Laudenslayer, 1988¹, for a more detailed discussion of special habitat elements).

CDFW Additional Comments

Federally Listed Species: Revisions to the Ordinance do not refer to Federal Endangered Species Act (FESA); however, CDFW also recommends consulting with the USFWS on potential impacts to federally listed species that may occur within project activity sites, including those listed in the tables above. Take under the FESA is more broadly defined than CESA; take under FESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting. Consultation with the USFWS, in order to comply with FESA, is advised well in advance of projects resulting in ground disturbance.

If you have any questions regarding CDFW's concerns, please contact Jamie Jackson, Senior Environmental Scientist at jamie.jackson@wildlife.ca.gov or by telephone at (805) 382-6906.

Sincerely,



Betty Courtney
Environmental Program Manager I
South Coast Region

⁴Mayer, K. E. and W. F. Laudenslayer, Jr. 1988. Editors: A guide to wildlife habitats of California. State of California, The Resources Agency, Department of Forestry and Fire Protection, Sacramento, CA.

cc: Ms. Christine Found-Jackson, CDFW, Newbury Park
Ms. Jamie Jackson, CDFW, Oxnard
Ms. Sarah Rains, CDFW, Newbury Park
Office of Planning and Research, State Clearinghouse, Sacramento
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CBOC, 1993. Burrowing Owl Survey Protocol and Mitigation Guidelines. California Burrowing Owl Consortium, April 1993.

The California Burrowing Owl Consortium Survey Protocol are considered the best methods available currently. The protocols can be found at the following URL:
<https://www.google.com/url?q=https://nrm.dfg.ca.gov/FileHandler.ashx%3FDocumentID%3D83842&sa=U&ved=0ahUKEwiar5i0hJvVAhWmrFQKHW4GBJgQFggGMAE&client=internal-uds-cse&usg=AFQjCNHwRtQg6wLwtqJoia2E9Xc0m6B33Q>

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DEPARTMENT OF TRANSPORTATION

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*Making Conservation
a California Way of Life.*

August 10, 2017

SB Various - Countywide
SCH# 2017071016

Jessica Metzger, Project Planner
Long Range Planning Division
County of Santa Barbara, Planning and Development
123 E. Anapamu Street
Santa Barbara, CA 93101-2058

**RE: COMMENTS TO NOP AND SCOPING OF EIR FOR CANNABIS LAND USE ORDINANCE AND
LICENSING PROGRAM**

Dear Ms. Metzger:

The California Department of Transportation (Caltrans) appreciates the opportunity to review and comment on the Notice of Preparation (NOP) for the proposed Cannabis Land Use Ordinance and Licensing Program Environmental Impact Report (EIR). Caltrans understands that the Project will consist of amendments to the Santa Barbara County Land Use and Development Code, Santa Barbara County Montecito Land Use and Development Code, and Santa Barbara County Coastal Zoning ordinance to allow certain types of cannabis activities by zone district. The Project also involves other amendments to the County Code, in order to establish a County licensing program for cannabis-related activities.

18-1 In concurrence with the NOP, Caltrans notes that traffic and circulation impacts may result from the distribution of cannabis, the establishment of cultivation sites, and from consumers traveling to and from commercial retail locations. When available, Caltrans requests the opportunity to review and comment on any traffic impact studies conducted for the Project. The EIR should review existing state highway traffic volume data, project trip generation/distribution, vehicles miles travelled (VMT), level of service (LOS) calculations, accident data, and safety issues; identify long-term operational impacts associated with cannabis-related development; and evaluate the Project's cumulative effects to traffic and transportation based on regional development trends. Generally speaking, when reviewing local development projects for transportation-related impacts, Caltrans will consider how the project promotes the six principles of the California Smart Mobility Framework: Location Efficiency, Reliable Mobility, Health and Safety, Environmental Stewardship, Social Equity, and Robust Economy. Consequently, the EIR should identify feasible mitigation options to address any significant transportation impacts, including mitigation for direct project-related impacts and requiring contribution of fair share development fees for cumulative impacts.

Caltrans looks forward to continued involvement in the proposed Project, including the opportunity to review and comment on the draft EIR and associated studies. If you have any questions, please contact me at Michael.Hollier@dot.ca.gov or (805) 549-3131.

Sincerely,

A handwritten signature in blue ink, reading "Michael D. Hollier", is written over a horizontal line.

MICHAEL D. HOLLIER
LD-IGR Coordinator
Planning District 5, South Branch



CALIFORNIA STRATEGIES, LLC

August 11, 2017

Ms. Jessica Metzger
Planning & Development
123 East Anapamu Street
Santa Barbara, CA 93101

Re: Public Comment, Environmental Scoping Document, Cannabis Land Use Ordinance and Licensing Program; Project Case No 17ORD-00000-00004

Ms. Metzger,

On behalf of our clients, thank you for your consideration of the following comments on the EIR Scoping Document and Draft Cannabis Ordinance. We would like to address two key issues, which are relevant for the scope of the environmental review: 1) distance requirements; and 2) non-storefront facing retail.

Distancing Requirements

The Adult Use of Marijuana Act (AUMA) Section 26054 provides local jurisdictions with the authority to either defer to the State's minimum distance requirement of 600 feet from sensitive receptors or specify a different radius – greater or less than 600 feet. Sensitive receptors, as defined in AUMA, are as follows:

1. Schools providing instruction in kindergarten or any grades 1 through 12;
2. Day Care Centers; and
3. Youth Centers.

Many local jurisdictions are deferring to the State's distance requirement of 600 feet for retail, but not for the other license types. For example, the City of Santa Rosa requires a minimum distance of 600 feet from schools for retail facilities only (or establishments that have a storefront outlet). They do not require minimum distances for cultivation, manufacturing, distribution and testing labs.

Similarly, the City of Los Angeles's Draft Ordinance includes increased distance requirements for retail only - 800 feet - and additional sensitive receptors, including alcoholism/drug rehabilitation or treatment facilities, public libraries, public parks, and other cannabis retail. Cultivation, manufacturing, testing, distribution, and delivery facilities (with no retail outlets) are not subject to distance requirements.

The County of Santa Barbara's Draft Cannabis Ordinance includes 600 foot setbacks from sensitive receptors for all license types, except volatile manufacturing, which is subject to a 1,200 foot minimum distance requirement from sensitive receptors. The County should consider analyzing decreased distance requirements for all license types.

The new, robust State standards for all license types adequately safeguards against negative community impacts, risk of diversion, and threats to public health and safety. Imposing arbitrary minimum distance requirements does not achieve these objectives.

The minimum distance setback required for each license type in Santa Barbara County should be based on substantial evidence developed through the EIR process for each individualized license type proposed (i.e., determinations must be based on real-life, identifiable, substantiated impacts), not simply on an unsupported assumption that all cannabis-related businesses, regardless of license type, have impacts requiring a minimum 600 foot setback. We recommend a comprehensive environmental review for each license type before determining what the appropriate distance setback should be for each license type.

Santa Barbara County also has the authority to define the distance to be measured from sensitive receptors to cannabis facilities. Currently, the County's draft policy proposes to measure the distance in a "straight line from the property line of the school to the closest property line of the lot" in which the cannabis facility is located. The County should consider defining the distance to be measured from sensitive receptors to cannabis facilities as a straight line from the *premise* of the cannabis use to the property line of the sensitive receptor. If the objective of distancing requirements is to avoid negative community impacts, measuring the distance from the actual site or building in which the operation is being conducted is more relevant and appropriate than from the property line. In many cases on large agricultural parcels in the unincorporated area, the cannabis use is setbacks hundreds of feet from the property line.

Non-Storefront Facing Retail

Deliveries may only be made by a licensed retailer. However, the Budget Trailer Bill, SB 94, clarified that "retail" can also be non-storefront facing. In other words, a retailer may conduct sales exclusively by delivery, and close their premise to the public. Delivery services can be run out of a fulfilment center/warehouse, instead of a licensed dispensary.

Currently, Santa Barbara County consumers are largely served by delivery because there are limited storefront retail options. Furthermore, the American public is increasingly shopping online and demanding products delivered to their door. Hence the decline of traditional retail.

Non-storefront retail presents a strategic opportunity for the County to capture taxes from delivery services, which already exist. However, the County can only capture the revenue if the delivery business is based in the unincorporated area and licensed by the County.

The majority of existing warehouse buildings that could be utilized for delivery fulfilment centers in the County are on small agricultural parcels. Only a small amount of space is needed – around 3,000 square feet. Our clients are interested to lease space in existing agricultural buildings for this purpose. There could be increased efficiencies if a

19-2
Cont.

delivery operator could secure a small permitted premise in the same warehouse shared with other licensed businesses – for example packaging. Therefore, we suggest it would be beneficial for the County to analyze permitting delivery fulfillment businesses on agricultural parcels.

Since non-storefront facing retail will not be open to the public, it will generate less community and environmental impacts. Fulfillment centers for other agricultural products already exist in the unincorporated area on small agricultural parcels.

Thank you for your consideration of these two issues.

Erin Weber
Associate, California Strategies

Metzger, Jessica

From: Carl Hein [cwhjsd59@cox.net]
Sent: Friday, August 11, 2017 9:30 AM
To: Cannabis Info
Subject: cannabis

20-1

We are definitely against any cannabis being grown in our neighborhood, which currently is very family oriented and friendly, with good air quality. From what I understand, all this could be changed by this happening in our area. No on cannabis!

Dr. and Mrs. Carl William Hein
Sungate Ranch

Metzger, Jessica

From: Diana Rigby [drigby@cusd.net]
Sent: Friday, August 11, 2017 2:25 PM
To: Metzger, Jessica
Cc: Andy Sheaffer; Diana Rigby; jaclyn Fabre; Jolene Colomy; Maureen Claffey; Michelle Robertson; Rogelio Delgado; Aaron LaPlante; Barnaby Gloger; David Weniger; Gerardo Corjeno; Jamie Persoon; Kirsten Escobedo; Mari Hornback; Maureen Fitzgerald; Michelle Fox; Ron Briggs
Subject: Carpinteria Unified School District's Response to the Proposed Cannabis Land Use Ordinance and Licensing Program

Hi Jessica,

21-1 I am writing this email to meet the deadline at 5pm today for the EIR response by the Carpinteria Unified School District as the new School Superintendent responsible for student and staff safety in our schools, and particularly in Carpinteria High School. As currently reported by the Carpinteria High School Principal, Gerardo Cornejo, the air quality in the high school classrooms is compromised by the strong objectionable cannabis odors originating from agricultural operations located on properties in the unincorporated County area in close proximity to 4810 Foothill Road. As a high school school, we are considered a "sensitive receptor" and it is proposed in the Code Draft that a 600' radius is sufficient to protect our students and staff from the dangers or nuisance of the cannabis activities. I strongly recommend that you investigate a more effective distance(such as the 1000 ft. proposed in SLO County) to ensure that the cannabis activities are not interfering with nor compromising the safety of our students and staff at Carpinteria High School.

Thank you for your consideration and I can be reached at 805.684.4511 for further discussion.

Thanks.

Diana Rigby

Diana F. Rigby, Superintendent
Carpinteria Unified School District
1400 Linden Ave.
Carpinteria, CA 93013
Phone: [805-684-4511](tel:805-684-4511)
Email: drigby@cusd.net
Twitter: [@CUSD_Super](https://twitter.com/CUSD_Super)

Cruz, Patrick

From: Villalobos, David
Sent: Tuesday, August 08, 2017 9:36 AM
To: Klemann, Daniel; Metzger, Jessica
Subject: FW: Cannabis Odor Control- SLO Draft Ordinance as Example

fyi

From: Jim Taylor [<mailto:jim@carpedata.com>]
Sent: Monday, August 07, 2017 4:20 PM
To: Villalobos, David <dvillalo@co.santa-barbara.ca.us>
Cc: Schunk, Cameron <cSchunk@countyofsb.org>; Anna Carrillo <annacarp@cox.net>; Mike Wondolowski <cal@silcom.com>
Subject: Cannabis Odor Control- SLO Draft Ordinance as Example

David,

22-1 This is the SLO draft ordinance. Their paragraph on odor control is straightforward, and I think a similar approach might be appropriate in Carpinteria, where residential neighborhoods are adjacent to a large number of greenhouses.

<http://agenda.slocounty.ca.gov/agenda/sanluisobispo/7547/IVQyMyEgUkVWSVNFRCA2LTIwLTE3LnBkZg==/12/n/79248.doc>

(4) Odors. All cannabis cultivation shall be sited and managed in a manner that prevents cannabis odors from being detected. Indoor cannabis cultivation shall be equipped with ventilation controls (e.g. carbon scrubbers) to minimize nuisance odor emissions.

(5) Pesticides. Pesticides and fertilizers shall be properly stored and handled.

DRAFT – REVISED 6/20/2017 – Page 1

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Jim Taylor
Vice President
Carpinteria Valley Association



jim@carpdata.com

5563 Calle Ocho
Carpinteria CA 93013

408-666-7356

<http://www.carpinteriavalleyassociation.org>

Cruz, Patrick

From: Catalina [catalina@peacechairproject.org]
Sent: Sunday, August 06, 2017 6:24 AM
To: Cannabis Info
Subject: Cannabis is SB County - are you out of your mind?

From: Catalina [<mailto:catalina@peacechairproject.org>]
Sent: Sunday, August 06, 2017 6:07 AM
To: 'cannabisinfo@countyofsb.org'
Subject: Cannabis is SB County - are you out of your mind?

Acapulco, a historical and beautiful vacation destination, on the Sea of Cortez, is located in the coastal state of Guerrero, now considered the most violent in Mexico due to cannabis and poppy farming proliferation and the drug cartels that feed the cannabis and heroin appetites of Americans. California and Santa Barbara County now flirt with the same distinction.

- 23-1 1. Now, legal in California, cannabis growers are proliferating without regulation. The small operations can't compete with the big growers and will continue to turn to the black market via cartels aka mafia aka gangs to sell their cannabis. They will skirt the regulations and regulators to survive.
- 23-2 2. Law enforcement is made more difficult by inviting the "drug manufacturers" to grow and sell their product in Santa Barbara County. Cartels aka mafia aka gangs make demands enforced with violence.
- 23-2 3. Environmental concerns are legitimate. The wine industry appetite for water is a drop in the bucket compared to the cannabis industry. The tightly controlled pesticide and fertilizer runoff requirements of Santa Barbara County for agriculture are not a concern for the small cannabis farms, growing under the radar, that are interested in fast cash profits paid by cartels aka mafia aka gangs.
- 23-3 4. Poppies and meth labs will follow cannabis in hoop houses as the heroin epidemic and general drug culture continues to mushroom. Cartels aka mafia aka gangs will be on hand to profit from the cash business violently regulated by their own small private armies.
- 23-3 5. Property owners and the general public of Santa Barbara County, and beyond, deserve leadership that protects their constituents from the plague of unregulated or casually regulated cannabis farming and marketplaces. **Strict regulations and the means to enforce them must be in place before the cannabis farms and marketplaces are ubiquitous in Santa Barbara County.**
6. Santa Barbara County can't have it both ways. Either we will continue to be a tourist mecca and legitimate agricultural prize or become a shabby-criminal-invested-unregulated-poorly-regulated-cannabis, or worse, empire. Witness the Mexican state of Guerrero.

Attempting to control the, ultimately, uncontrollable is a fools game. Egypt made cannabis illegal because ambition was nullified across the country. Stop the madness.

Respectfully submitted,

Cathleen McIsaac Bowman
Resident of Santa Barbara County

Aesthetics and Visual Resources

In the Eastern Goleta Valley Community Plan on p.168 there is a listing of the public scenic resources. The EIR should include a consideration of these for any impacts related to cannabis grown in the ag-zoned lands in that area. Also, the county's scenic highways are precious visual resources and changes to the viewsheds, vistas, scenic points surrounding these highways in the ag fields will be an impact: see attached links/references regarding the latest designation of 101 along the Gaviota Coast as a scenic highway in evaluating the impacts of cannabis activities in this and other corridors.

24-1

Any new exterior lighting associated with cannabis activities needs to be evaluated and mitigated. The county's current standards regarding exterior lighting are inadequate and out of date. The California Building Code uses principally dark sky lighting standards for any new exterior lighting. And three community planning areas, Eastern Goleta Valley, Santa Ynez, and Gaviota all have Dark Sky lighting standards in their community plans and any new lighting in these areas must meet those requirements. Mitigation for any new exterior lighting needs to be dark sky compliant to protect the night sky and the surrounding areas from the impacts of new exterior lighting.

Another issue is that of cannabis grown in greenhouses and hoop houses, where, without blackout tarps or some other mechanism to completely block out the lighting inside, interior lighting effectively becomes exterior lighting and thus "sky glow." Imagine, if you will, all the hoop houses on the east side of 101 in Santa Maria making the hillside glow at night. Currently, it is my understanding that the only night lighting in agricultural areas is used for a very short period of time during the grape harvests in the fall. Any changes to this scenario in the ag fields will be impactful affecting not only the character of the area and residents and depending upon where/how the cannabis is being grown, perhaps the nocturnal environment for wildlife as well..

Indoor cultivation can also occur in commercial/industrial zoned areas. Night lighting installed for safety and security purposes outside the building may be more than that traditionally found in those zone districts. Are there any impacts from this additional lighting on surrounding businesses/residential areas/streetscapes and what are the mitigations for ensuring that this additional lighting will dark-sky compliant to reduce impacts of new lighting?

Will the county's sign ordinance need to be updated with different standards for signs/advertising for cannabis related facilities? What is the process to do this and what development standards will be considered? Please list them in the EIR.

What are impacts of any fencing needed for security in either ag fields or in manufacturing/commercial areas? Establish development standards of what is acceptable and what is give examples of what is not acceptable (e.g. no black plastic fencing, no razor wire). Development standards should include kinds of fencing materials, wall and fence construction standards, heights, etc. Fenced cannabis cultivation sites should not look like an armed fortress. Include debris removal from outside fences and maintenance of fencing in the development standards as well. Consider mitigation for fencing that may block wildlife corridors if appropriate. If possible, provide fence development standards for the public to comment on.

24-2 | Agriculture

Will multiple leases with different lessors be allowed on one ag parcel? ?

Air Quality and GHG Emissions

24-3

Anecdotal information indicates there might be an odor issue with the few plants that individuals are allowed to grow in their backyard. What enforcement will there be if neighbors are negatively impacted?

Cultural

24-4

Discuss the impact of growing cannabis on ag fields which are/may be considered cultural landscapes.

Hazards and Public Safety

24-5

Include in this section impacts both to the environment and to residents in high fire hazard areas of any cannabis-related activities..

Land Use and Planning

Residential/Ag conflicts: Per the draft ordinance, cannabis is proposed for all ag zone districts, but not all ag zone districts are suitable for cannabis-related activities. As an example, in the 2nd district, there are Ag-1 zone districts in the heart of the urban area in the Eastern Goleta Valley. Some of these parcels are surrounded by homes, schools, near a hospital. Some Ag-1 zoned parcels on More Mesa have apartment buildings located on them. Another Ag-1 zone parcel located off LaGoleta Road is surrounded by RR zoning. Also, many of the AG-II zoned parcels in the Eastern Goleta Valley are adjacent to residential properties. EIR needs to address the conflicts and impacts of locating cannabis related activities near residential areas for both Ag-1 and Ag-2 parcels.

Similar situations exist in the Santa Ynez Valley with Ag-1 zoning where “hobby farms” are really just large residential properties and may not be suitable for the requirements of cannabis cultivation which would have impacts on nearby sensitive receptors either on the same or adjacent properties. Carpinteria already is experiencing Ag-1 and residential zoning conflicts. See attached article. There is no speculation as to the conflicts between cannabis activities on Ag in Carpinteria and nearby residents. What are mitigations?

Commercial Zone District conflicts: While scoping document indicates that no additional impacts are foreseen in allowing cannabis related businesses in these zone districts, consider the following: Cannabis retail stores will have an influx of business with a steady stream of customers which may impact surrounding businesses. I believe that the shopping area where the retail outlet is located will be a magnet, drawing shoppers not only living close by but from afar. Parking will be expected and in demand, requiring more parking, not less. In older developed areas, parking needs outstrip county parking requirements (e.g., the Trader Joe’s parking lot on DeLaVina). Allow a cannabis retail outlet only in a shopping center with multiple tenants (like the Turnpike Center) where there is ample parking for all tenants. Small retail centers, like those at Modoc at Hollister often lack sufficient parking even for the in-place merchants. When locating cannabis retail stores in the community, a requirement should be there is ample parking.

Colorado has cannabis shops that are open 24 hours. What hours will retail outlets be allowed? Will they have longer “store open” hours than adjacent businesses, creating security issues for closed stores/ adjacent neighborhoods?

24-6

The presence of a cannabis business may change the carefully planned visual environment cultivated in commercial districts because of increased security footprint, special handling of waste, odor discharge from exhausts vents; fencing needed when not applicable to other business in the area, increased night lighting, etc. How will these aspects be mitigated so one tenant in the shopping complex doesn't stand out from the rest?

Mixed Use Zoning

Housing: All residentially zoned properties have been excluded from any cannabis zoning except for the Mixed Use Zone District. However, in the Eastern Goleta Valley (EGV) Community Plan, housing in mixed use zoning is considered residential zoning. I believe there are similar considerations for the CM-LA zone district. The community planning processes never considered the impacts of allowing cannabis activities and/or businesses in mixed-use zone districts. Here are some of the impacts that need to be evaluated of a cannabis-related business in the same complex as a residential use: increased security footprint needed/required changing the residential character of the complex, activity related to cannabis business with impact on residents and residential character of neighborhood. There is the odor issue where sealing of walls to prevent odor migrating from cannabis-related activities in one space into adjacent residential space will be needed as well as preventing any odorous exhaust from manufacturing facilities should they be located in the MU zone district. Possibly increased traffic throughout the day and into the evening in the complex because of nature of cannabis retail outlet.

Parking: When mixed-use zoning was considered as a way to provide more housing; it was understood that parking would be limited in most cases. Considered at the time of this planning effort was the notion of "conjunctive-use parking" where hours of operation and demand for parking were envisioned for use by different entities during different times of the day. That is, residents would use the spaces at night and businesses would use the spaces during the day, thus serving more than one use. Allowing a retail cannabis outlet in mixed-use zoning will create parking demand on the complex never envisioned or provided for in the planning process. In the case of a retail outlet on Hollister in the EGV mixed-use area, there is no parking on Hollister and there will be limited parking in a mixed-use complex with residents expecting to be able to park their cars at night when a cannabis retail store will most likely be open at night, using spaces intended for the residential occupants.

The EIR needs to address the incompatibility in allowing cannabis-related businesses in mixed use zoning where other residential zone districts aren't faced with the impacts generated by these kinds of business activities. The Mixed-Use District is a residential zone district and, at least, in the Eastern Goleta Valley Community Plan even has its own development standards addressing the residential nature of the zoning. There should be no cannabis-related businesses allowed in this zone district or in any mixed-use district in the county for that matter.

Public Services: Increased security issues of cannabis related businesses affecting resident's safety could occur in both MU zone district and in residential areas adjacent to commercial areas. The following information is excerpted from the California Dept of Food and Agriculture Draft PFEIR p.4.11-6: *In Colorado, where cannabis was legalized for recreation in 2012, dispensaries faced frequent robbery and burglary attempts despite security measures. The Police Foundation reports burglary rates at licensed cannabis outlets in CO are much higher than other retail outlets. Because cannabis-related organizations are forced to deal in cash, this subjects them to a substantially increased risk for crime.* Will buffers be needed between commercial areas where retail outlets are

24-6
Cont.

24-7

24-7
Cont. | located and immediate adjacent residential areas to mitigate increase in crime? While the elevated risk of crime isn't an impact under CEQA, it is a great concern to neighbors and residents located near cannabis retail outlets to their quality of life.

24-8 | **Public Utilities:** Scoping document lists increased waste from cannabis cultivation, but I believe the waste issue is broader than that. Some cannabis waste may be hazardous and needs to be handled differently than waste that isn't. What are impacts and evaluate capabilities of local facilities/vendors in handling increased and hazardous waste.

24-9 | **Buffers as mitigation:** California has established a minimum of 600ft buffer for K-12 schools and day care facilities. EIR must examine if this is sufficient distance to mitigate the impacts from various aspects of cultivation and dispensaries in the commercial and residential neighborhoods. Also to be included in any 600ft or greater buffers are other youth oriented centers where youth congregate on a regular basis. Permanent facilities like the Boys and Girls Club, Girls, Inc., Ben Page Youth Center, all on Hollister as well as for tenants in commercial/retail buildings which cater to youth, like the Indoor Trampoline Club in the Turnpike Shopping Center, and the SB Gymnastics Club at 4179 State Street. Also buffers should occur for libraries and, public transit stops where youth take the bus..

See below for links/reference material from Aesthetics/Visual Resource Section and Land Use Planning

There are three scenic highways in Santa Barbara County, all important visual resources.

- Highway 101 along the Gaviota coast, from the western boundary of the City of Goleta, north to the intersection of Highway and State Route 1 at Las Cruces.
- State Highway 1 from its intersection with Highway 101 at Las Cruces, north to the southerly city limits of Lompoc.
- The entire length of Highway 154.

For your consideration is the initial Board Letter regarding the scenic highway designation for the Gaviota Coast

<https://santabarbara.legistar.com/LegislationDetail.aspx?ID=2847879&GUID=502721CA-BC4A-4F00-A023-CF3F3B035456>

The final application packet for the Gaviota Coast Scenic Highway Designation application to Caltrans is located here:

http://longrange.sbcountyplanning.org/programs/gaviotascenichighway/Santa%20Barbara%20Co_%20Application%20Packet_NOV2016.pdf

This is a useful page from Caltrans about the Scenic Highways program, that talks about the benefits of designation:

<http://www.dot.ca.gov/design/lap/livability/scenic-highways/faq.html>

Grow operations out of control

The First District Supervisor's Office and Carpinteria City Council seem asleep at the wheel as greenhouses immediately adjacent to housing in Carpinteria are converted to cannabis grow operations. Residents are subjected to noxious odors, noise and night lighting in what has become a 24/7 industrial farming process. This is affecting residents' health, property values and quality of life. Some city residents have bedrooms within feet of the county greenhouses.

That the greenhouses are in county jurisdiction is no excuse for inaction by each agency. Greenhouses are being illegally converted to cannabis operations, and no agency is holding up a stop sign. A buffer zone of 1,000 feet seems a minimum setback between housing, schools and grow operations.

The lure of tax dollars should not override the government's duty to protect and serve the people. A wise decision would be to limit cannabis grow operations to rural areas far from housing and schools, in locations where water supply is available and rural residents are not affected. I doubt any such place exists.

A wiser decision would be to not permit commercial cannabis grow operations in Santa Barbara County. Our county's reputation as a clean, environmentally concerned and welcoming tourism destination will go down the drain with all the negative effects of cannabis operations. The direct impacts to individual residents and the cumulative effects to communities such as Carpinteria by grow operations will be disastrous.

John Culbertson
Carpinteria



CHERNIS LAW GROUP P.C.
2425 Olympic Blvd. Suite 4000-W
Santa Monica, CA 90404
Telephone: (310) 566-4388
Facsimile: (310) 382-2541

Email: michael@chernislaw.com

August 11, 2017

VIA E-MAIL

Jessica Metzger, Program Manager
Santa Barbara County Long Range Planning Division
123 E. Anapamu St.
Santa Barbara, CA 93101
cannabisinfo@countyofsb.org

Re: Draft Cannabis Land Use Ordinance Public Comments

Dear Ms. Metzger:

I am writing on behalf of Chernis Law Group P.C. (“CLG”), a Santa Monica-based law firm, that represents collectives, dispensaries, deliveries, cultivators, manufacturers, landlords, patients, and other cannabis-related clients. I am writing concerning the Draft Cannabis Land Use Ordinance released on July 12, 2017, on behalf of a client in Santa Barbara County who resides in an Agriculture II zone, and who will be seeking multiple cultivation permits for her property.

CLG and its client greatly appreciate the efforts of the Santa Barbara County Long Range Planning Division and their Staff in promulgating the draft land use ordinance for commercial cannabis activity. Your office has been transparent, professional and helpful during this process. However, the Draft Cannabis Land Use Ordinance did not address a few issues of concern to our client, and likely other prospective applicants, and to that end we respectfully submit the following comments and recommendations for your consideration:

1. The Draft Cannabis Land Use Ordinance authorizes issuance of commercial cannabis cultivation in certain zones, and specifies the types of cultivation permits available along with the maximum square footage to be associated with that permit type, on a particular “premises.” However, it does not



CHERNIS LAW GROUP P.C.

August 11, 2017

Page 2

address whether an applicant may seek multiple cultivation licenses or permits on a single parcel of land, thereby creating multiple “premises” on their parcel. I would note that State law (SB 94) authorizes multiple “premises” on a single parcel of land, provided they are “separate and distinct” in some fashion. Ca. Business and Profession Code § 26053(c). The Draft Land Use Ordinance does not provide a “premises” definition, but states that if a word is not defined, the Director will determine the correct definition utilizing State law. Since State law permits issuance of multiple licenses or permits on a parcel provided each licensed or permitted “premise” is “separate and distinct,” we would recommend that a permittee in Santa Barbara County be able to seek multiple permits for cultivation on a single parcel provided they are on distinct “premises” as defined by State law. This would avoid any inconsistency between State and local laws.

2. Along the same lines, and assuming multiple “premises” on a single parcel for outdoor and/or mixed light cultivation are permissible in Santa Barbara County, we recommend that the Ordinance describe at least by example what type of division or separation would be required to create a “separate and distinct” premise. For example, we recommend for purely outdoor cultivations that each “premise” be separated by a surrounding fence line, and for mixed light cultivations that each “premise” merely identify the hoop structures or greenhouse that comprise such “premise.”
3. Still assuming multiple “premises” are to be permitted on a single parcel, and in turn multiple permits, the Draft Cannabis Land Use Ordinance does speak to any limits on the number of permits that may be obtained by a single applicant on a single parcel for multiple “premises.” State law (SB 94) generally imposes no limits in this regard. Likewise, it does not limit the aggregate amount of square footage that can be devoted to cultivation on a parcel of land. Rather, it provides that, “a person may apply for and be issued more than one license under this division, provided the licensed premises are separate and distinct.” Ca. Business and Profession Code § 26053(c). While Ca. Business and Profession Code § 26061(a)(8)-(10) notes that the State will limit the number of Type 3, 3A, and 3B licenses that the Department of Food and Agriculture can issue; it imposes no limits whatsoever with regard to Type 2, 2A, or 2B licenses. See Ca. Business and

25-1
Cont.



CHERNIS LAW GROUP P.C.

August 11, 2017

Page 3

25-1
Cont.

Professions Code § 26061(a)(5)-(7). Thus, we recommend that Santa Barbara County not restrict the number of Type 2, 2A, or 2B permits or licenses a person may obtain for a single parcel of land with multiple “premises”, or if limits are to be imposed set the limit at an aggregate of no less than two acres of canopy on a single parcel (including the comprised “premises”), and no less than four acres of cultivation canopy per “Owner” across the County.

Thank you for taking the time to consider our comments and recommendations.

Sincerely,

Michael Chernis, Esq.

Cruz, Patrick

From: Cheryl Mrachek [cherylmrachek@gmail.com]
Sent: Tuesday, August 01, 2017 9:57 AM
To: Cannabis Info
Subject: Rezoning for marijuana growing

Attention of Jessica Metzger, Project Manager

26-1 I do not support the rezoning of the farm areas on Hollister, or any other residential area in Santa Barbara County, in order to grow marijuana plants. This will cause property devaluation as well as odor and breathing issues for all of us who live and work within this area.

We need you to stop this rezoning effort. Please listen to our needs.

Thank you,

Cheryl Mrachek

340 Old Mill Rd #96

Santa Barbara, CA

93110

Sent from my iPhone

CITY of CARPINTERIA, CALIFORNIA



August 10, 2017

Attention Ms. Jessica Metzger
County of Santa Barbara Planning and Development Department
Long Range Planning Division
123 East Anapamu Street
Santa Barbara, CA 93101-2058

Re: Notice of Preparation and Scoping of an Environmental Impact Report
Cannabis Land Use Ordinance and Licensing Program EIR
Case No. 17ORD-00000-00004

Dear Ms. Metzger:

Thank you for the opportunity to comment on the County's Notice of Preparation (NOP) for the Draft Environmental Impact Report (EIR) for the Cannabis Land Use Ordinance and Licensing Program. As described in the scoping document, the project under consideration is the adoption of a cannabis ordinance that would allow commercial cannabis cultivation, manufacturing/processing with non-volatile and volatile extraction, post-processing and packaging, testing, distribution and retail. The Draft EIR will describe the nature of these different aspects of commercial cannabis operations, identify the potential environmental impacts of uses, and identify alternatives and/or mitigation measures to address these impacts.

The City has reviewed and is generally in agreement with the issues and potential impacts identified in the County's Environmental Scoping Document. This includes the general topics of Aesthetics and Visual Resources, Agricultural Resources, Air Quality and Greenhouse Gas (GHG) Emissions, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Public Safety, Hydrology and Water Resources, Land Use and Planning, Noise, Public Services, Transportation and Circulation, and Public Utilities.

Due to the City's immediate adjacency to extensive agriculturally designated lands in the unincorporated area of the County, natural resources in the City and its residents, visitors and businesses, may be uniquely affected by any impacts resulting from expanded cannabis-related operations in the Carpinteria Valley. According to the County's recent voluntary registry effort, almost one quarter (52) of the 216 self-reported current cultivators countywide are located in the Carpinteria Valley. Of these 52 cultivators, it is not known how many are operating in a manner consistent with current law at the local and/or state levels. Furthermore, the number of self-registered cultivators located in the Valley underscores the desirability of the greenhouse and open field agricultural lands in the Carpinteria Valley for commercial cannabis operations. It is expected that many of the 506 self-registered "future cultivators" throughout Santa Barbara County are also looking at additional sites in the Carpinteria Valley.

The City has reviewed the County's Draft Cannabis Land Use Ordinance dated July 12, 2017. Comments herein identify issues, potential impacts, possible alternatives and/or mitigation measures that are germane to the City's statutory authority and are aimed at assuring that the project (i.e., Ordinance) and its potential impacts to the physical environment affecting the City are understood and properly disclosed. The City believes this is a project of area-wide significance and is responding in the belief that the project could affect residents, businesses, natural resources and public facilities within its jurisdiction.

This comment letter is provided for the limited purpose of assisting the County in scoping the project EIR. The City anticipates providing comments at the appropriate time on the various elements of the draft regulations applicable to the Carpinteria Valley including but not limited to what cannabis uses and activities are allowed, where certain uses are allowed, and development and operating standards.

Land Use and Agricultural Resources

Issue L1: As part of the EIR for the pending Cannabis Land Use Ordinance, the County should consider the consistency of the project with the County's Carpinteria Valley Greenhouse Program (Program) and resultant Carpinteria Agricultural Overlay District, and the potential for any new cannabis regulations to encourage or promote further conversion of open field agricultural lands to greenhouse facilities in the context of the Program regulations. The adopted Program included a numerical cap on the total amount of permissible new greenhouses and greenhouse-related development (including packing and shipping facilities and hoop structures) in Area "A" of the Overlay District. The City is not aware of any available, current figures concerning the remaining acreage capacity for new greenhouse development in this Area. Furthermore, and as discussed throughout this letter, the City is generally concerned with the land use and environmental effects of any additional greenhouse development in the Carpinteria Valley. The proliferation of greenhouses and greenhouse-related development in the Valley has led to a continued industrialization of Carpinteria Valley agricultural lands. The City believes further development of such uses and facilities in the Carpinteria Valley is inappropriate and inconsistent with the intent of Agricultural land use designations in the Coastal Zone.

By way of background, in 2004, the County Board of Supervisors (BOS) finalized their adoption and incorporation of amendments to Article II of Chapter 35 of the Santa Barbara County Code to address the outcomes and findings of the Carpinteria Valley Greenhouse Program (Program), including the establishment of the Carpinteria Agricultural Overlay District. The purpose of the program was to identify, limit (through regulation) and mitigate the potential impacts to coastal resources in the Carpinteria Valley resulting from future cumulative greenhouse development. The City of Carpinteria worked closely with the County, providing feedback and comments on the Program throughout the adoption process, to address concerns over continued greenhouse development germane to the City.

The City of Carpinteria General Plan/Coastal Plan, certified in 2003, also includes a number of Objectives and Policies (i.e., Objective LU-4 and Policies LU-4a, -4b and -4c) meant to ensure that development patterns in the unincorporated Carpinteria Valley are supportive of the Coastal Act and City objectives to

preserve unique coastal resources by maintaining open field agricultural uses as the predominant use in the unincorporated Valley.

27-1
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Alternatives/Mitigation: References in the Land Use and Development Code use tables should include a reference to compliance with the applicable provisions of the Carpinteria Agricultural Overlay District for any new cannabis operations contemplated in the Carpinteria Valley. If necessary, license or acreage caps could be considered to limit the proliferation of indoor/greenhouse cannabis operations in the Valley and/or to preserve available capacity for other non-cannabis agricultural uses.

Issue L2: The County's Draft Cannabis Land Use Ordinance dated July 12, 2017, contemplates allowing cannabis cultivation (Types 1-4) and non-volatile manufacturing (Type 6) in both the AG-I and AG-II zone districts, as well as volatile manufacturing (Type 7) in the AG-II zone district. The EIR should describe the nature of, intensity and processes involved in both types of cannabis-related manufacturing and compare these activities to the types and intensities of agricultural processing currently allowed in the AG-I and AG-II zones for "traditional" agricultural products. Those differences should be discussed in terms of intensity of uses (employment, traffic trips, etc.) and risks to public health, safety, and natural resources. Risks associated with allowing volatile manufacturing in areas of moderate or high fire hazards should be especially carefully considered and evaluated in coordination with fire protection agencies.

27-2

Alternatives/Mitigation: Alternatives considered should include further restricting or prohibiting where and/or to what extent manufacturing (Types 6/7) is permitted to occur, particularly in areas where manufacturing is determined to be inconsistent with current policies for preserving agriculture. Mitigation to be considered could include siting manufacturing facilities in areas that do not pose significant safety risks to surrounding land uses or wildlands, requiring the incorporation of additional safety measures (e.g., fire sprinkler systems, spill containment response plans, etc.) in all manufacturing facilities to minimize risk of accidents, fires, or spills, and requiring individual permitting/coordination of such facilities with applicable fire protection agencies (in the case of the Carpinteria Valley, this is primarily the Carpinteria-Summerland Fire Protection District).

27-3

Issue L3: The County's Draft Ordinance does not specify whether cannabis manufacturing/processing would be limited to on-premise products only, or whether off-premise product manufacturing/processing would also be allowed. We note that presently for other non-cannabis agricultural processing, only the processing of on-premise products are a permitted use in the AG-I and AG-II zones, with production of off-premise products being a conditionally permitted use only in the AG-II zone district. The EIR being prepared for the Cannabis Land Use Ordinance should identify and evaluate the potential environmental effects of allowing cannabis manufacturing/processing of off-premise products within the AG-I and AG-II zones. Specifically, the City is concerned with increased employee vehicle and/or truck traffic associated with deliveries to/from such facilities and the potential for the increased industrialization of activities occurring within Agriculturally-designated areas in the Coastal Zone.

Alternatives/Mitigation: Alternatives considered should include limiting cannabis production/manufacturing to on-premise products (only) in both the AG-I and AG-II zone districts (if

27-3
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manufacturing/processing is to be allowed at all (see Issue L2 above). Such alternatives would help to discourage the likelihood of large scale “industrialized” cannabis operations in or among the smaller AG-I and AG-II designated parcels found in the Carpinteria Valley. Mitigation measures that limit the extent, number or location of such manufacturing/production facilities could also be considered.

27-4

Issue L4: The EIR Scoping Document prepared by the County did not identify possible effects to the CEQA issues of population and housing as an anticipated area of study. We believe that the potential for the project to result in socio-economic changes to the nature or intensity of agricultural employment, and/or agricultural employee housing demands must be analyzed and discussed in the EIR. The EIR must consider the employment demands generated by cannabis operations in comparison to other agricultural uses currently being practiced in the County (and specifically in the Carpinteria Valley), and the distribution of residency of employees for cannabis operations compared to other agricultural uses. Again, in light of the City’s immediate adjacency to extensive agricultural lands under the County’s jurisdiction and the City historically serving as a primary source of housing for many individuals employed in the Carpinteria Valley’s agricultural industries, the City is especially exposed to the potential impacts of any intensification of employment demands related to new or expanded commercial/medical cannabis operations.

Alternatives/Mitigation: Alternatives that are based upon the available potential work force, housing costs in the area, commute distances from affordable housing, etc. should be considered. If increased availability of housing affordable to the work force is anticipated, the availability of suitably designated and located land in the County should be identified. Possible mitigation measures to consider include revisiting allowances for agricultural employee housing in the AG zone districts, and/or implementing a Development Impact Fee or In-Lieu fee program to set aside funds for additional affordable housing for increased agricultural employees resulting from any intensification of agricultural operations over existing conditions as a result of the considered Ordinance.

27-5

Issue L5: The EIR should consider the potential for expanded cannabis operations to support or encourage the growth of ancillary, supporting or complementary uses, including but not limited to tourism-based operations (e.g., tours, “tastings,” “cannabis clubs,” “farm stays,” etc.). Potential land use, traffic circulation, public safety, and environmental effects of such uses, including where, or if, such uses would be permitted, should be discussed evaluated.

Alternatives/Mitigation: If allowed at all, potential mitigation could include limiting where, when and at what level of intensity such uses are permitted. Licensing/permitting of such uses should be required with coordination through appropriate municipal and/or public safety agencies.

27-6

Issue L6: Numerous nuisance complaints related to odor, light and noise have been brought to both the City and County resulting from the impacts of existing cannabis operations in the unincorporated Carpinteria Valley occurring in close proximity to sensitive receptors located within the City of Carpinteria, including but not limited to schools, youth centers/daycares and residences. Further expansion and intensification of cannabis operations in the Carpinteria Valley has the potential to exacerbate the inherent conflicts between these land uses.

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Alternatives/Mitigation: As discussed elsewhere in this letter, mitigation measures to be considered should include mandatory buffers or setbacks from nearby sensitive receptors, numeric caps on licenses issued within a defined geographic area, and other physical development standards or required improvements (e.g., odor controls, etc.) for permitted premises to address and abate nuisance impacts.

27-7

Issue L7: The EIR should consider if and how cannabis operations would utilize the unique characteristics of agricultural land in Coastal Zone (e.g., soils, climate), and if and how the products produced are uniquely suited to the characteristics of the Coastal Zone or whether they succeed similarly in non-coastal areas when grown under similar conditions. The comparative costs of producing in the Coastal Zone versus other areas where the same products could be grown/produced should also be considered.

Alternatives/Mitigation: Mitigation considered should include means of assuring the availability of agricultural lands in the Coastal Zone for the growing of products that require the area's unique attributes.

27-8

Issue L8: While not specifically a CEQA issue, we do note that the County's urgency ordinance prohibiting all non-medical cannabis operations in unincorporated Santa Barbara County will expire in April, 2019, however, the County's timeline for the adoption of the Cannabis Land Use Ordinance (as presented at the July 11, 2017 Board of Supervisors hearing) suggests certification of a Local Coastal Plan Amendment (LCPA) to incorporate cannabis regulations into the County's Article II Coastal Zoning Ordinance may not be considered by the California Coastal Commission (CCC) until May 2019 (or later, depending upon scheduling, among other variables). Post-certification work efforts associated with the final implementation of the Ordinance within the Coastal Zone (e.g., returning the approved LCPA to the County BOS for acceptance, CCC acknowledgement of County acceptance of CCC action, etc.) would further delay the Ordinance from immediately taking effect.

In light of this potential timing gap between when the current urgency ordinance expires and when the Cannabis Land Use Ordinance would take effect in the Coastal Zone, what is the County's strategy for addressing and regulating existing cannabis operations and prospective new operators in areas located within the Coastal Zone during the period when no local regulations would otherwise be in effect? Of particular concern to the City are operations that are ongoing yet are subject to little, if any, regulation and generate complaints from residents and members of the public due to nuisances (e.g., odor, light, etc.). What is the status of enforcement efforts and what will be the County's enforcement strategy should the development and approval of regulations extend beyond the anticipated timeline?

Traffic & Circulation

27-9

Issue T1: Access to greenhouse and open field agricultural lands in the Carpinteria Valley from U.S. 101 is provided by local arterial and collector streets that pass through the City of Carpinteria, including Casitas Pass Road, Linden Avenue, Santa Monica Road and Cravens Lane. Existing agricultural uses in the Valley impact City streets and intersections through increased traffic, as well as the unique impacts associated with heavy truck traffic, such as damage/wear on local roads, and the inadequacy of some intersections and driveways to accommodate heavy truck turning movements. These concerns also

apply to State Route 192, which passes through the Carpinteria Valley and the City of Carpinteria. Changes in the intensity or nature of vehicle trips associated with existing agricultural uses as a result of expanded Cannabis cultivation and production must be considered.

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Alternatives/Mitigation: Mitigation could include operational measures such as excluding truck traffic from certain streets where conditions merit and/or limiting new vehicle trips during peak hours or similar methods. The County could also consider the establishment of a Development Impact Fee program to assess intensified uses for their incremental share of roadway and infrastructure improvements necessary to meet increased demands. We note the County previously established a similar program as part of the Carpinteria Valley Greenhouse Program to mitigate identified traffic impacts to the Santa Monica Road/Via Real/U.S. 101 intersection associated with future greenhouse development.

The potential for road/intersection repairs or improvements, addition of bike or walking paths, improving site distances at driveways and intersections, and ensuring adequate loading and parking facilities are provided onsite for cannabis operations should also be considered. If expanded cannabis operations would result in increased heavy truck traffic for concentrated areas, an assessment should be completed that determines whether or not local streets in the affected area are constructed adequately to accommodate increased truck traffic. Mitigation that would offset the proportionate share of damage done to local streets by traffic associated with increased, concentrated cannabis cultivation/manufacturing operations should be considered.

27-10

Issue T2: Assessing the potential impacts related to traffic and circulation will depend greatly on an understanding of the number of employees required for the expected number of cannabis operations and from where they will be coming. A study of the expected cumulative employment generation, where affordable housing for the work force is located and by what means and routes employees will commute to work must be completed in order to assess potential project impacts and provide adequate mitigation.

Alternatives/Mitigation: If warranted, mitigation considered could include methods for reducing vehicle trips (e.g., carpooling, bicycle lanes, etc.) and the establishment of housing affordable to the work force convenient to, or within, the project area(s).

27-11

Issue T3: In areas where expanded, concentrated cannabis operations are expected to occur (like in the Carpinteria Valley), a significant intensification in the number of agricultural employees associated with cannabis operations could impact the need for public transportation in the area. The EIR should include an assessment of the public transportation available, how it would be impacted and whether or not existing locations/routes would adequately support increased demand in these areas.

Alternatives/Mitigation: If warranted, mitigation could include cooperation with municipal transportation providers in the area to determine projected usage by agricultural employees and to determine if alterations in schedules and/or routes is necessary or possible. Similarly, the expansion or improvement of existing bicycle lanes along primary commute routes to/from affected agricultural lands could be considered.

Visual Resources & Blight

Issue V1: Lighting impacts from indoor and outdoor cannabis operations associated with both cultivation/production operations and site security measures must be considered and evaluated. Specifically, the City is concerned with cumulative impacts to the Carpinteria Valley night sky such that visibility and aesthetics in the area would be diminished, as well as nuisance impacts to other surrounding land uses (e.g., residences) in close proximity to such uses.

Alternatives/Mitigation: Mitigation that could be considered includes the use of roll-down covers or similar physical means of preventing light leakage or spillover from cultivation operations. Night sky friendly, hooded lighting that does not result in spillover onto adjacent properties should be required for all security and property lighting.

Issue V2: As noted above under “Land Use and Agricultural Resources” Issues, the City is concerned with the potential for the contemplated cannabis regulations to encourage or foster further growth and expansion of greenhouse and manufacturing/production facilities within the Carpinteria Valley and the impacts this would have on the visual character of the Valley. The proliferation of such facilities contributes to an increasing industrialized character of agricultural lands in the Valley. Furthermore, a general lack of adequate screening, setbacks and/or buffering of such uses from adjacent residential land uses and from nearby public roads throughout the Carpinteria Valley further degrades the visual quality of the area and contributes to a blighting effect upon the area.

Issue V3: The aesthetic impacts of the increased securitization of agricultural lands (e.g., large imposing fencing/gates, use of razor wire or similar physical deterrents, armed security, surveillance equipment, additional lighting, etc.) resulting from cannabis cultivation and manufacturing facilities should be considered and evaluated. Again, a proliferation of such infrastructure may contribute to a blighting effect and an increasingly industrialized character of the Carpinteria Valley that is not in keeping with the largely rural nature of the Valley, which has been identified for protection in both the County’s and City’s LCPs.

Issue V4: Aesthetic and quality of life impacts on adjacent land uses as a result of any increased industrialization and/or securitization of rural agricultural lands, and the impacts such changes would have on property values should be considered and addressed.

Alternatives/Mitigation: Mitigation should be considered that would result in the creation of development standards that take into account aesthetic treatments of new cannabis operations and any needed security improvements, and may include required setbacks, screening, landscaping or similar buffering elements from adjacent uses and public spaces (including roads) with the intent of preserving the existing rural character of the area. Additionally, exterior security lighting should be required to be limited to the minimum necessary for safety purposes and designed to be “night-sky” compliant.

Issue V5: Improvement requirements made by the County are often not implemented through approved development or are not properly maintained so as to be effective. Unpermitted improvements are also often not observed or abated for extended periods. Enforcement of

development standards and other zoning requirements has been lax allowing necessary and required improvements to be ignored and unpermitted uses to occur, which further impacts the visual quality of the Valley.

27-12
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Alternatives/Mitigation: Mitigation should be considered that would result in Code Enforcement officer(s) being dedicated to actively regulating and monitoring cannabis operations through the County. Public notifications, including mailed notices to nearby surrounding neighbors, concerning new or expanded licenses would help to inform concerned neighbors of pending operations and provide an opportunity for affected neighbors to share their input. Mandatory recurring inspections as part of ongoing licensing requirements (including renewals) would also help to ensure ongoing permit compliance. This would ensure a greater level of compliance at the construction stage, maintenance of required improvements over the long term, and responsiveness to citizen inquiries/concerns.

Air Quality/Odors

Issue AQ1: The EIR should describe and evaluate any public health effects from exposure of persons to odors or airborne particulates associated with the contemplated types of cannabis operations (e.g., cultivation, manufacturing/processing, etc.). This analysis should include a discussion of impacts to persons that have particular sensitivity or allergies to the types of organic and chemical compounds inherent to the uses and activities contemplated by the regulations.

Alternatives/Mitigation: If appropriate, mitigation could include mandatory buffers from sensitive receptors, including residences, and/or limiting such activities to indoor, enclosed operations that are outfitted with appropriate air filtering/scrubbing technologies.

27-13

Issue AQ 2: Intensification or expansion of indoor cannabis cultivation/manufacturing uses in the Carpinteria Valley has the potential to further impact air quality in the area, both from point sources (such as emissions from new large cultivation/production/manufacturing facilities) and non-point sources (e.g., increased vehicle and large truck trips). As stated previously, it will be important to consider cumulative impacts from new construction and employment generation, including the resultant impacts to housing demand (and location), vehicle trips/circulation, etc.

Alternatives/Mitigation: Mitigation measures considered should include design measures to reduce GHG emissions associated with point sources and means for reducing the number and distance of vehicle trips traveled in association with cannabis operations. If warranted in specific areas, intersection and/or street improvements that are capable of reducing congestion could also be considered.

Issue AQ3: Complaints concerning nuisance odors from cannabis operations occurring in unincorporated areas of the County in proximity to sensitive receptors such as schools, youth centers/day cares and residences located within the City of Carpinteria have increased significantly over the last couple of years. Residents complain that the odor is objectionable, degrades their quality of life and may pose health risks. Nuisance impacts related to the unique odor characteristics of cannabis operations must be considered and addressed.

27-13
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Alternative/Mitigation: Mitigation considered should include recognition that certain aspects of cannabis operations should not occur within certain distances of sensitive receptors, including residential uses. Incorporation of air scrubbing technologies on cannabis operations must be considered to help mitigate nuisance odor complaints.

27-14

Issue AQ3: The EIR should evaluate if, or how, pesticide, fertilizer or chemical usage (including for both volatile and non-volatile manufacturing) associated with the cannabis industry differs from that of existing agricultural operations, particularly in areas where such agricultural uses occur in close proximity to other land use types. Impacts related to odor from, and exposure to, such materials must be addressed.

Alternatives/Mitigation: Mitigation considered should include ensuring ongoing compliance with application standards and operating procedures as managed through the Agricultural Commissioner's office. If necessary, appropriate buffers from nearby surrounding sensitive receptors could also be considered.

Noise

27-15

Issue N1: Nuisance noise from fans, ventilation systems and other operating characteristics of cannabis industry for nearby sensitive receptors, including residential land uses in City, must be addressed and evaluated. Like odor and lighting, noise complaints have seen a recent increase among residential areas in close proximity to existing cannabis operations in the Carpinteria Valley.

Alternatives/Mitigation: Mitigation considered should include recognition that certain aspects of cannabis operations should not occur within certain distances of sensitive receptors, including residential uses, and/or during certain hours that are likely to disturb residents or other sensitive receptors. Appropriate development standards should be established and enforced.

Public Facilities & Services

27-16

Issue PF1: The EIR should describe and evaluate potential impacts to law enforcement service demands associated with the various aspects of commercial cannabis activities. The potential for the cash basis of the cannabis industry to lead to an increase in crime, including the potential for an increased incidence of crime in areas adjacent to commercial cannabis activities (i.e., robberies, burglaries, weapons possession, etc.) should be investigated/analyzed in the EIR.

Alternatives/Mitigation: Possible alternatives to be considered include physically limiting the number or geographic extent of the various types of commercial cannabis activities so as to not create an overconcentration of such uses. Any such alternative should consider the cumulative impacts of the concentration of commercial cannabis activities with other "traditional" blighting uses (e.g., bars, liquor stores, pawn shops, adult-oriented businesses, etc.). Potential mitigation measures to be considered should include additional law enforcement personnel to serve affected areas, minimum requirements, certifications, licenses and inspections for individual cannabis operations and their employees, minimum buffers/separation requirements from other blighting uses and/or exploring options for establishing and

requiring participation of commercial cannabis operations in safer alternatives to an “all-cash” operation.

Issue PF2: Potential increased demands for fire protection services associated with the contemplated cannabis operations relative to existing agricultural activities should be described and evaluated. In particular, any potential increased risks of fire, spills, and accidents associated with cultivation and manufacturing activities should be evaluated. We note that much of the Carpinteria Valley is located in or near moderate and/or high fire hazard areas. The appropriateness and risks associated with, for example, volatile manufacturing in such areas, should be carefully evaluated and reviewed with proper fire protection authorities. The potential for any increased incidence of traffic accidents associated with the various aspects of commercial cannabis activities should also be described and evaluated.

27-17

Alternatives/Mitigation: Alternatives considered could include prohibition or further limitations (e.g., license number caps, size thresholds, etc.) on where particularly high risk activities associated with commercial cannabis are permitted to occur. Mitigation measures considered could include use of development standards to buffer or separate uses from adjacent at risk land uses/resources, requiring mandatory incorporation of appropriate safety measures/technologies, and/or establishing a fee program or similar to require new/intensified uses to pay an incremental share toward additional fire safety personnel, equipment and/or facilities to serve affected areas.

Issue PF3: Differences in water use and demand relative to traditional agricultural crops grown in the County and in specific sub-areas like the Carpinteria Valley, should be described and evaluated. This should include demands on both municipally-provided water (like the Carpinteria Valley Water District) and from groundwater reserves through the use of private wells. Impacts to water availability and reserves, particularly in times of drought, resulting from commercial cannabis cultivation should be considered.

27-18

Alternatives/Mitigation: Mitigation considered could include caps on the number of licenses issued or the amount of acreage allowed to be used for cannabis operations (i.e. cultivation, etc.) for a given geographical area so as to not exceed or pose an undue burden on available water resources. Mitigation should also explore options for cultivation and manufacturing operations to use recycled and/or recirculated water systems and low water use irrigation technologies.

Issue PF4: The EIR should consider and describe the means of providing electrical service to cultivation and processing facilities, and the impacts on demand and availability of such services resulting from increased growing operations (particularly as a result of energy intensive indoor growing facilities), including cumulative impacts from other future anticipated land uses in the County. If generators or other “off the grid” technologies will be considered for cannabis operations, they should be evaluated for their own potential environmental and nuisance impacts to surrounding land uses.

27-19

Alternatives/Mitigation: Appropriate measures should be developed to ensure expanded cannabis operations in a defined area do not reduce existing or anticipated service levels. Measures to reduce energy usage, while avoiding negative environmental impacts should also be explored.

Water Quality/Flooding and Drainage/Groundwater Recharge

Issue W1: The EIR should consider the potential impacts to water quality/runoff, flood and drainage, and groundwater recharge impacts from the expansion of cannabis cultivation and manufacturing activities, particularly in areas where cannabis activities are expected to be concentrated such as the Carpinteria Valley. Cumulative impacts of new operations along with existing agricultural operations should be included, particularly as it relates to increases in impervious surfaces within a defined watershed.

27-20

Alternatives/Mitigation: Mitigation considered should include implementation of low impact development strategies and stormwater best management practices to address water quality and runoff concerns from cultivation and manufacturing operations. Irrigation methods that result in no or minimal offsite runoff should also be considered. In the case of new greenhouse or building construction, preservation of sufficient permeable areas to allow for onsite runoff retention and percolation should be required.

Biological Resources

Issue B1: The EIR should consider the potential impacts to biological and habitat resources from the expansion of cannabis cultivation and manufacturing activities, particularly in areas where cannabis activities are expected to be concentrated such as the Carpinteria Valley. Cumulative impacts of new operations along with existing agricultural operations should be included.

Alternatives/Mitigation: Specific means for the protection and preservation of sensitive habitats such as wetlands and creeks should be considered. Means of protection could include but are not limited to on-site preservation and restoration through mandatory buffers or setbacks from such resources, and development restrictions/requirements aimed at avoiding or minimizing impacts to nearby resources.

27-21

Issue B2: The potential for direct impacts to wildlife domestic pets as a result of pest control activities associated with cannabis cultivation operations should be discussed and evaluated. Use of poisons, rodenticides and similar pest control strategies on cultivation sites near wildlands and/or urban residential areas could result in unintended impacts to wildlife and domestic pets, including incidences where a domestic pet ingests another animal previously exposed to such materials.

Alternatives/Mitigation: Mitigation measures to address this concern could include limitations or restrictions on the types of pest control measures permitted to be used in sensitive areas (e.g., near creeks or wildlife corridors, or near residences), requirements for appropriate physical deterrents to discourage targeted wildlife or pets from entering cultivation sites, and written notification to neighboring residential land uses concerning the presence and potential hazards of exposure to such pest control materials.

If you have any questions concerning these comments, please contact me at (805) 755-4414 or by email at steveg@ci.carpinteria.ca.us.

Sincerely,



Steve Goggia, Director
Community Development Department
City of Carpinteria

Cc: City Ad Hoc Cannabis Committee
City Council members
Dave Durflinger, City Manager
Nick Bobroff, Senior Planner
Ed Foster, Carpinteria-Summerland Fire Protection District
Sheriff Bill Brown, Santa Barbara County Sheriff's Department
Bob McDonald, Carpinteria Valley Water District



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August 10, 2017

Jessica Metzger
County of Santa Barbara Planning and Development
Long Range Planning
123 E. Anapamu Street
Santa Barbara, CA 93101
jmetzger@countyofsb.org

SUBJECT: Comments on Notice of Preparation and Scoping for Cannabis Land Use and Licensing Program EIR

Dear Ms. Metzger:

Thank you for the notification, and opportunity to comment on the scoping of the EIR analysis for the Cannabis Land Use and Licensing Program. The City of Santa Barbara Planning Division offers the following comments:

We reviewed the County's proposed ordinance and considered the existing zoning in the City's Sphere of Influence, and along the City/County boundary. Given that the existing County zoning in these areas is primarily agricultural, and the existing City zoning is primarily residential single-unit, the regulations could allow cannabis cultivation near residential areas, with the potential for environmental effects. Issues related to cannabis cultivation that may result in effects in the City are odors and light trespass/pollution, along with dust, noise, and pesticide exposure, some of which are to be addressed in the EIR analysis.

Because the profitability of cannabis cultivation could result in more intensive use of agriculturally zoned land, we suggest including an analysis of potential intensification be included in the Environmental Impact Report. We appreciate that the scope will include a look at water use as that is an important issue for the region. Part of the analysis might also include consideration as a mitigation measure or alternative of an ordinance provision for a required minimum distance between cultivation and residential land use, for example 600 to 1000 feet. In the scope and in the draft ordinance, we suggest more analysis and detail about security measures that will be required to protect neighbors. In addition to requirements, there should be information about additional types of security measures commonly implemented for cannabis cultivation (types of fencing, guards, motion lighting, cameras, etc.) and how those measures may impact neighboring residential areas, visual resources, biological resources, traffic, etc.

We would like to offer the following comments on lighting and odor issues:

Lighting – 35.42.075.D.2

The proposed ordinance provides clear measures to address lighting with greenhouses being completely shielded between sunset and sunrise.

28-3

35.42.075.D.2a states: “Lighting shall be shielded to prevent light trespass into the night sky and/or glare onto lots other than the lots that constitute the project site, or rights-of-way.”

The City uses the term “light pollution” with regard to light escaping into the night sky, and “light trespass” with regard to light beams crossing property boundaries. The City has design guidelines for outdoor lighting which express the City’s concerns and objectives related to the control of outdoor lighting:

<http://www.santabarbaraca.gov/civicax/filebank/blobdload.aspx?BlobID=17314>

Odor – 35.42.075.D.3

28-4

The proposed ordinance provisions to control odor appear vague in that they lack clear direction on the preparation of an odor abatement plan per 35.42.075.3.a, and how such a plan will be determined to be acceptable.

Consider addressing, or cross referencing in the code, how problems related to lighting and odor are enforced, including repeat violations.

Thank you for the opportunity to comment.

Sincerely,



Renee Brooke, AICP
City Planner

CITY OF SANTA BARBARA, Community Development

Cc: Tony Boughman, Assistant Planner, City of Santa Barbara

Metzger, Jessica

From: Craig Bittner [craigbittner@yahoo.com]
Sent: Wednesday, August 09, 2017 9:45 PM
To: Cannabis Info
Cc: Craig Bittner
Subject: Voting "No" on rezoning "Noleta" to allow growing of cannabis

I recently heard that there are steps underway to rezone the area known as "Noleta" to allow farms to grow pot on a commercial scale. I want you to know that I am vehemently against this proposal for the following reasons:

- 1) The marijuana plant exudes a skunky smell and its off-gassing of the plant can cause severe allergic reactions.
- 2) Burning eyes and tight lungs and headaches are common side effects of the air pollution created by pot farms.
- 3) The growers spew out perfumes and air fresheners to try to cover the smell, but the air fresheners have their own additional health risks.
- 4) The health risks would permeate the heavy concentration of people and children in our neighborhoods, which include a major high school with multiple athletic programs.
- 5) Additionally doctor offices, Cottage Hospital, eateries, Vons supermaket and other restaurants would be negatively impacted as the workers and their patrons would be affected by these health risks.

There is plenty of space to grow the plants on the North side of the mountains. Why risk the health of our families and children? This would be an irresponsible decision.

Craig Bittner
805-964-6497

Metzger, Jessica

From: Dave Clary [templeclary@gmail.com]
Sent: Friday, August 11, 2017 3:32 PM
To: Cannabis Info
Cc: Dave Clary
Subject: Cannabis land use and licensing program

Attention Jessica Metzger ...

This is on behalf of David and Lillian Clary who have resided at 2988 Tepusquet Road, County of Santa Barbara since December 16, 1996.

This is basically a reiteration of the key points made by Dave Clary at the EIR meeting in Santa Maria on July 27, 2017. We do not purport to speak for all members of the Tepusquet Canyon Cannabis Committee.

ZONING ISSUE

In your Draft Land Use Ordinance, what is proposed to be allowed or disallowed is established by Zone. Most of Tepusquet Canyon is zoned Ag I or Ag II. Hence, when we of the Tepusquet Canyon Crisis Committee, individually or as a group make recommendations, they would apply to all the areas in the county of Santa Barbara that are zoned Ag I or Ag II.

This is not what we intend. We do not purport to represent or speak for any area that is zoned Ag I or Ag II that is outside of Tepusquet Canyon or its feeder road areas. So we hope you can find a way to narrow the focus for those of us in Tepusquet Canyon to just the canyon and its feeder areas.

By feeder areas, I am referring to those areas zoned Ag I or Ag II that use roads that feed into Tepusquet Canyon for entrance and exit. I am thinking of, for example, Colson Canyon road. There are marijuana growers that use that road for ingress and egress both in, at least, one inholding in the Los Padres National Forest as well as other parts of the National Forest. There may be others before the National Forest boundary is reached using that road as well.

WATER

You have received numerous comments about water issues in the canyon. We, in particular, have heard accounts of enormous amounts of water being trucked to cannabis growing sites past the home of one of the members of our group. The account, which given the source, I consider to be very accurate, is of 30,000 gallons per week (perhaps more at this point). We worry a great deal about the usage of water in the canyon, especially from water sources within the canyon.

Last year, before the rainy season, many of our neighbor's wells had dried up and they were facing the costs of digging deeper wells. Many were worried about exhausting the availability of water completely. It is very disturbing to hear those on the side of the cannabis growers claim at public meetings before the county ad hoc cannabis committee that cannabis cultivation uses very little water. This is not the real world they are portraying. We personally are opposed to any cultivation of cannabis in the canyon not already mandated by law.

QUALITY OF LIFE

This is an amorphous issue that encompasses each underlying problem mentioned already ... water, traffic, pollution, noise, fire hazard and one more (at least) and that is an atmosphere of fear and intimidation. We all know about the activities and viciousness of the cartels in Mexico. We do not know if there is any contact or representation among the

growers in Tepusquet Canyon from these groups. We do know some ignore easement issues and have threatened residents.

We have read in a recent New York Times article, their California section, that approximately 80% of the cannabis grown in California is shipped out of state, largely to areas where the sale of cannabis is illegal. What kind of business person is going to engage in this kind of enterprise? It would appear to draw those entities that already have ties to illegal sales out of state. Does that mean cartels? It certainly means people we are reluctant to trust, and whose public claims of friendly neighborliness grate against common sense.

30-3
Cont. One case reported to me is that a known grower (or employee of that grower) demanded that a local resident allow him to use all the water in his water storage tank, many thousands of gallons. The owner of the tank and property refused. The next day, while no one was home, someone stole all the water from his tank. The owner is so intimidated by the attitude of the grower he has been afraid to report it to the sheriff (who has taken no enforcement actions in other situations in the canyon regarding cannabis growers).

We have seen enormous commercial gasoline tanker trucks driving up dirt roads for deliveries to cannabis growers. What is going on? The increased fire hazard that threatens is scary. (Contrary to general knowledge, much of the canyon remains unburned.) Some of our long term neighbors have mentioned they were considering moving from the canyon, selling their property. This would probably make the growers happy; but it is wrong that anyone in the canyon should so feel his or her quality of life is threatened in that fashion.

Thank you for your consideration.

David and Lillian Clary

County Decision Makers,

As I watch the initial stages of our County's effort to design a plan for the scope and impact of the new cannabis industry in our neighborhoods, I have several concerns:

31-1

- There is clearly a gold-rush fever element (by a relatively small % of County residents) to get the now legalized marijuana industry ramped up as fast as possible. With big revenues on the line for the County, local entrepreneurs and outside interests, the highly charged push for 'everything pot', seems to be steamrolling the normal, steady, sensible planning practices we expect to be in play for any community game-changer of this magnitude.
- The private subcommittee approach of Supervisors Williams and Lavagnino to date is suspect, suggesting hidden motives, potential corruption, and an obvious skirting of the Brown Act. Is the public really expected to trust that this unconventional process is somehow in the general community's best interest? From here on out, everything cannabis-related should be out in the light in the purview of all 5 Supervisors and under the public's watchful eye. Isn't that why we have governance with established processes? Furthermore, Supervisor Wolf needs to be directly involved in any changes in her District. Here in the Eastern Goleta Valley, we have spent 10+ years developing a mutually beneficial community plan with our Supervisors and expect that any tweaks to that plan will go through the same, rigorous channels. We care about our neighborhoods !!
- Have County executives issued any mandate or inference that the cannabis industry must be allowed to thrive here in order to stimulate County revenues? Everything on the table please. With oil and developer interests, the County has always been careful and deliberate to not sell-out our communities so that a few, very pushy personalities, can get even richer. What's different here? Established neighborhoods and historical quality of Santa Barbara life come first !!

31-2

- As residents in Carpinteria have testified, pot crops **stink** and should be kept **miles** away from any established neighborhoods. The wind can blow in any direction on the South Coast, and downwind patterns should be thoroughly examined.

31-3

- Keep the industrial aspects of the cannabis business far away from established residential areas, including our local shopping centers. That means any growing, processing, packaging, warehousing of pot products should be located in sparsely populated, more remote areas. Interesting Note: Few knew or cared about the illegal pot industry operating for decades in the remote areas of Los Padres National Forrest. *Out of Sight, Out of Mind*, is still a good model for current scoping and locale considerations.
- **Don't rezone anything** without due diligence, public reviews, substantial input from the Planning Commission, Environmental Review, police, fire, schools, and neighborhood representatives. We haven't invested years of our energies to build a great community here, only to recklessly throw it away because a small minority of citizens suddenly think that we can't live without the non-essential pot industry in our midst.

Bottom Line: Permanent **Land Use** is the issue here and must be studied carefully over time for the good of the large majority of County residents who are not pot-infatuated. We have real concerns about the long term effects of unleashing irreversible, cannabis ordinances on our local culture and youth. Learn from the negatives in Colorado. Our State has not mandated *any* timelines or requirements to do anything locally. Be smart and prudent for the long-term good of our communities.

--David Kloos, Eastern Goleta Valley

Cruz, Patrick

From: Dennis LaLumandiere [dlalu@yahoo.com]
Sent: Wednesday, August 02, 2017 1:11 PM
To: Cannabis Info
Subject: Proposed Rezoning for cannabis farming

Attention: Jessica Metzger, Project Manager

Dear Ms. Metzger,

I subscribe to a number of neighborhood news groups in unincorporated Santa Barbara County. Several of the groups recently have had numerous discussions regarding the potential rezoning of growing areas adjacent to Hollister Avenue between Turnpike Road and Patterson. This rezoning would allow for cannabis cultivation.

If this is the case, I find it very troubling and I am very much opposed to this happening. While I know that the citizens of California have voted to allow for the cultivation and distribution of recreational marijuana, I believe that the spirit of the law assumes responsible and common sense application. The current growing areas that may be subject to rezoning have existed in harmony with the adjacent neighborhoods because the products grown have not affected the quality of life of the residents.

I am opposed to the rezoning of this land for three reasons:

When grown, cannabis emits an overwhelming odor which, depending on the direction of the wind, could drift to the surrounding neighborhoods. This could have a severe impact on the quality of life of the residents in the neighborhoods in the area. This has been reported by those that live adjacent to the greenhouses in Carpinteria where apparently cannabis is currently being cultivated.

Cannabis is illegal in most states, which makes it very valuable and subject to a potential increase criminal activity in the areas where it is grown.

There are a number of schools near the area in question and while growing the product there would be legal, I don't believe it is prudent to expose our children to it.

In closing, I believe common sense should apply and this rezoning should not take place. I respect the laws of the state and my comments have nothing to do with any personal feelings about marijuana use. However, while I enjoy eating a steak from time to time, I would oppose the placement of a stock yard next to any neighborhood. I believe that those who enjoy marijuana should not expect that neighborhoods should be subject to the odors created in the growth of the product that they consume. I hope that the decision makers in this process will respect the wishes of the communities that might be impacted and find more suitable, common sense sites that would not impact nearby neighborhoods.

Respectfully,

Dennis LaLumandiere
4600 Camino del Mirasol
Santa Barbara County

Cruz, Patrick

From: Susan Ashbrook [sjashbrook@gmail.com]
Sent: Thursday, August 03, 2017 12:55 PM
To: Cannabis Info
Subject: Cannabis Comments

Susan Ashbrook & Derek McLeish

3375 Wild Oak Road

Lompoc, CA 93436

33-1 We have lived in Santa Barbara County over 17 years. When we built our metal shed row barn, one of the many environmental regulations we were required to meet was that our land be tested for endangered tiger salamanders. Some neighbors have installed as many as 8 hoop houses on their property. Shouldn't they have the same regulations to check for the endangered species?

Those who have placed hoop houses on their property are doing so without permits or under false pretenses. In our area, permits have been granted for tomatoes and flowers but are now growing marijuana.

Here are our environmental questions:

- 33-2
1. Under what standard will noxious harvest emissions be measured?
 2. Many of the hoop house are running generators all night long, how will that impact be measured? CO2, NOX?
 3. Light pollution what is the standard for light pollution?
 4. How will fertilizer and pesticide runoff be measured?
 5. Will a bond be required for build outs to remediate the property if/when the hoop houses are no longer a viable business?

Thank you,

Derek McLeish and Susan Ashbrook

Metzger, Jessica

From: Diane Cook [dmchealth800@yahoo.com]
Sent: Friday, August 11, 2017 11:03 AM
To: Cannabis Info
Cc: jwolf@countysb.org
Subject: Fw: Future cannabis growing in Santa Barbara County

To: Ms. Jessica Metzger, Project Manager,

34-1 I am a home owner in Sungate Ranch and I am writing today to say I am totally opposed to having cannabis growing in the Hollister corridor or any populated area in Santa Barbara County. What makes are area so wonderful are the views of the mountains, the terrain and natural beauty here. I do not think Ag-I land use should be turned into hoop houses to grow pot that are not in character with our neighborhood. I ask for no re-zoning of the Ag-1 land use on the Hollister corridor.

34-2 My concerns are many. What about the environmental impact of the grow lights, noise of fans, horrific smell, theft, and safety of our community? We in Sungate have many two stories homes with no air conditioners. With the smell and having to close the windows in 80 degree temperatures how is that safe? We are surrounded not only by residential housing but by 2 schools and Girls Inc. That's a lot of extra children right next to a proposed pot farm. Why the subcommittee approach of 2 Supervisors moving rapidly on this let's get pot on San Marcos Growers, Lane Farm and the avocado orchard? Why closed doors here that makes the public unaware of what is truly happening. What happened to all 5 Supervisors and out in the open for public view? And what about the buffer of only 600 feet? Have we truly studied Carpinteria's issues with the cannabis growing and business which are many?

34-3 In summary, I am protesting the development and re-zoning of farmland surrounding Sungate Ranch and Hollister corridor. Please vote against re-zoning of these beautiful lands on the Hollister corridor and preserve the people of Sungate Ranch and other housing developments nearby their quality of living. Say no to cannabis growing in Santa Barbara County.

Thank you for your consideration.

Best regards,

Diane Cook

Metzger, Jessica

From: Doug Burbank [burbank@ucsb.edu]
Sent: Friday, August 11, 2017 12:41 PM
To: Cannabis Info
Cc: Doug Burbank
Subject: Open hearings on rezoning and cannabis cultivation in Santa Barbara

Attention: Jessica Metzger,
Project Manager

35-1 I would like to state my opposition to closed deliberations that are presently occurring with respect to the introduction of cannabis cultivation in the Santa Barbara area. The issues related to rezoning, to impacts on neighborhoods, to impacts on schools and businesses, and to air quality (among others) need to be discussed in open public hearings among the full board of supervisors. Irrespective of their purpose, the current closed hearings of a few supervisors give the impression of wanting to "sneak" something past the citizens without full public scrutiny.

35-2 This style of government and decision-making is NOT in the best public interest and "smells" of big business or other underhanded dealing. These attributes are NOT those that we expect from our elected officials. Hence, I strongly urge a switch to open hearings and deliberation of the important issues related to legalized growing, harvesting, and selling of cannabis.

I hope that such openness will re-appear soon on this and related issues.

Sincerely yours,

Doug Burbank

1026 Sandpiper Lane
burbank@ucsb.edu

Dept. of Earth Science
Univ. of California
Santa Barbara, CA 93106
<http://www.geol.ucsb.edu/faculty/burbank>

Ennis, Reanna

From: Doug McGinnis [dougmcginnis1@gmail.com]
Sent: Friday, July 28, 2017 9:37 AM
To: Cannabis Info
Cc: FredShaw@ci.carpinteria.ca.us; D, Dave; Doug McGinnis
Subject: Cannabis Growing

Hello,

36-1

I am a long time resident of Carpinteria and wanted to provide my input on the future impact of cannabis growing in our area. IF the greenhouses are to grow cannabis it is my desire that they must control the offensive skunk odor that we are now smelling almost nightly. Other concerns of the greenhouse grows are the mold and dust that is exhausted or ventilated outdoors.

36-2

We are already prisoners of our own homes when the nightly skunk smell occurs. We must go indoors, close all windows and we still get the smell in the house. Other collateral concerns are health of breathing whatever mold and chemicals may be in use, water usage(?), increase in crime or safety, housing and care of 'trimmers' hired to cultivate the plants, providing for 'trimmers' when the season is done and they require assistance with food and housing. We already deal with avocado theft, I suspect the much more valuable cannabis crops will be a likely target.

I am not anti-marijuana, but I do not believe these large grows belong in our backyard!

Sent from [Mail](#) for Windows 10

Cruz, Patrick

From: Edo McGowan [edo_mcgowan@hotmail.com]
Sent: Wednesday, July 19, 2017 3:41 PM
To: Cannabis Info; Wolf, Janet; Office of Supervisor Janet Wolf; Edo McGowan; DasWilliams
Subject: draft ordinance regulating the potential cultivation, manufacturing, testing, commercial distribution and retail sales of marijuana in Santa Barbara County.

Couple of observations on scoping. Although water is mentioned, in doing key word searches for the following, these words were not found:

PESTICIDE
AGRICULTURAL CHEMICAL
INSECTICIDE

How do such potential inputs interact with the local water resources?

If these are not discussed as needed inputs, who regulates these inputs, how is that accomplished, what are potential impacts on ground water, which agencies of government interact in this, if at all,? What are the mandatory intervals between application, reentry, and harvest, and Hazards to Bees (if any). Is there any residue limit established for this crop, if so, how tested?

Additionally, since recycled wastewater is legally allowed on crops, what are the public health impacts from such use in irrigation? The recycled water as produced by both Santa Barbara and Goleta is documented to be carrying multi-antibiotic resistant pathogens and their genes.

The Fahrenfeld paper below tested both Santa Barbara and Goleta's recycled water. Thus, based on those results, the potential for the use of recycled water on any crop may be problematic. Assuming that the County's staff comprehends phytoremediation concepts, what materials can be taken up into the cannabis plant that could adversely impact human health.

The material below is incorporated by reference.

[Reclaimed water as a reservoir of antibiotic resistance genes - NCBI](#)

<https://www.ncbi.nlm.nih.gov/pubmed/23755046>

by N Fahrenfeld - 2013 - [Cited by 39](#) - [Related articles](#)

May 28, 2013 - *Fahrenfeld* N(1), Ma Y, O'Brien M, Pruden A. ... A broader range of ARGs were detected after the reclaimed water passed through the ...

[\[PDF\]Edo McGowan - State Water Resources Control Board](#)

www.waterboards.ca.gov/water_issues/programs/land_disposal/.../edo_mcgowan.pdf

May 27, 2014 - microbes and their antibiotic resistant genes ARGs), a ND will not do and a full EIR needs to be under taken with testing of the water by a third ...

You visited this page.

To: Felicia Marcus, via David Balgobin
Fm: Dr Edo McGowan
Re: The choice of an ND is inappropriate



I would appreciate some indication that this was forwarded to Felicia Marcus

The email I received from the SWRQB indicated the following:

The proposed General Order and Draft Initial Study/Negative Declaration are available at http://www.waterboards.ca.gov/water_issues/programs/land_disposal/waste_discharge_requirements.shtml.

Since recycled water as currently produced carries large numbers of antibiotic resistant microbes and their antibiotic resistant genes (ARGs), a ND will not do and a full EIR needs to be undertaken with testing of the water by a third party, say like Amy Pruden. This fact that recycled water as currently produced is full of pathogens is hardly new information. The US-EPA did a major study on this topic back in 1981, citing studies on the topic going back into the 1950s. I find it hard to imagine how your board could come up with an ND with this kind of history and material in the literature. It is not as if we have an abundance in workable antimicrobials. In fact we are running out of functional drugs while at the same time the bugs are gaining in resistance. Sewer plants and their production of these resistant organisms and their genes continue to pump out industrial volumes daily into the environment. Just for academic interest, it would be interesting to discuss this with you, I would welcome the opportunity.

BACKGROUND

Sewer plants by their design generate antibiotic resistant microbes and their genes. We and others have tested recycled water meeting state requirements. These tests have documented the fact that the finished recycled water carries multi-drug resistant bacteria and their genes. This information has been repeatedly reported to the state (your board as well as CalEPA, and CDPH,) all apparently without effect. It should be recognized that because the ARGs are small. Genes are designed to fit through nuclear pores, the opening of which (functional diameter) is about 9 nanometers wide, but that is the size of the globular state but they can string out. Because they are not "alive" cells, but protein, they are unaffected by chlorine at contact times and concentrations typically used by plants producing recycled water. If you look at the screen sizes of filters typically used for recycled water, it will see that there is a large disparity and that's why we are finding ARGs in the finished recycled water. They are also essentially unaffected by UV. The effects of UV on antibiotic resistant organisms is discussed in the US-EPA report, where it actually enhances resistance and survival (see: <http://aem.asm.org/content/43/2/371.full.pdf>).

WERF documented that the finished and disinfected recycled water contained an array of pathogens (see WERF report 00-PUM-2T as well as the paper by Valerie Harwood---abstract appended below).

Our own work shows that while the water as first discharged from the plant to the purple pipes may meet Title 22 standard on indicator organisms, it contains many pathogens of which there is a mix of multi-drug resistance (see inserted picture)

Above picture is from the El Estero plant in Santa Barbara showing bacteria resistant to 11 of the 12 challenge antibiotics. Work done in medical microbiology lab on Muller Hinton agar, disk diffusion drops from Kirby Bauer.

If, in addition to testing as the water just leaves the plant we also test at the POU, we are finding with typical indicator using the MPN, that the numbers are off the chart and we are still picking up multi-drug resistant organisms. Something is going on in the pipes on the way to the POU. We opine that either or both of the following may be happening: resuscitation of viable but non-culturable (VBNC), bloom of persisters, or shedding of biofilms that grow in the purple pipes. The up-shot is this water is hardly safe. WERF found something similar with sewage sludge where 20 minutes following successfully meeting bacterial counts, testing again showed that the numbers jumped several magnitudes. Thus the standardized tests are throwing false negatives and this is a serious flaw that could adversely impact public health..

By giving your program an ND, the above issues are neatly covered up----something I would not

expect from a state agency charged with protection of public health.

Validity of the Indicator Organism Paradigm for Pathogen Reduction in Reclaimed Water and Public Health Protection†

1. [Valerie J. Harwood^{1,*}](#),
2. [Audrey D. Levine²](#),
3. [Troy M. Scott³](#),
4. [Vasanta Chivukula¹](#),
5. [Jerzy Lukasik³](#),
6. [Samuel R. Farrah⁴](#) and
7. [Joan B. Rose⁵](#)

† Author Affiliations

1. ¹Department of Biology, SCA 110, University of South Florida, 4202 E. Fowler Ave., Tampa, Florida 33620
2. ²Department of Civil and Environmental Engineering, ENB 118, University of South Florida, 4202 E. Fowler Ave., Tampa, Florida 33620
3. ³Biological Consulting Services of N. Florida, Inc., 4641 N.W. 6th Street, Suite A, Gainesville, Florida 32609
4. ⁴Department of Microbiology and Cell Science, University of Florida, Gainesville, Florida 32611
5. ⁵Department of Fisheries and Wildlife and Crop and Soil Sciences, 13 Natural Resources Building, Michigan State University, East Lansing, Michigan 48824

ABSTRACT

The validity of using indicator organisms (total and fecal coliforms, enterococci, *Clostridium perfringens*, and F-specific coliphages) to predict the presence or absence of pathogens (infectious enteric viruses, *Cryptosporidium*, and *Giardia*) was tested at six wastewater reclamation facilities. Multiple samplings conducted at each facility over a 1-year period. Larger sample volumes for indicators (0.2 to 0.4 liters) and pathogens (30 to 100 liters) resulted in more sensitive detection limits than are typical of routine monitoring. Microorganisms were detected in disinfected effluent samples at the following frequencies: total coliforms, 63%; fecal coliforms, 27%; enterococci, 27%; *C. perfringens*, 61%; F-specific coliphages, ~40%; and enteric viruses, 31%. *Cryptosporidium* oocysts and *Giardia* cysts were detected in 70% and 80%,

respectively, of reclaimed water samples. Viable *Cryptosporidium*, based on cell culture infectivity assays, was detected in 20% of the reclaimed water samples. No strong correlation was found for any indicator-pathogen combination. When data for all indicators were tested using discriminant analysis, the presence/absence patterns for *Giardia* cysts, *Cryptosporidium* oocysts, infectious *Cryptosporidium*, and infectious enteric viruses were predicted for over 71% of disinfected effluents. The failure of measurements of single indicator organism to correlate with pathogens suggests that public health is not adequately protected by simple monitoring schemes based on detection of a single indicator, particularly at the detection limits routinely employed. Monitoring a suite of indicator organisms in reclaimed effluent is more likely to be predictive of the presence of certain pathogens, and a need for additional pathogen monitoring in reclaimed water in order to protect public health is suggested by this study.

FOOTNOTES

- Received 27 September 2004.
- Accepted 20 December 2004.

[Front Microbiol.](#) 2013 May 28;4:130. doi: 10.3389/fmicb.2013.00130. eCollection 2013.

Reclaimed water as a reservoir of antibiotic resistance genes: distribution system and irrigation implications.

[Fahrenfeld N¹](#), [Ma Y](#), [O'Brien M](#), [Pruden A](#).

[Author information](#)

Abstract

Treated wastewater is increasingly being reused to achieve sustainable water management in arid regions. The objective of this study was to quantify the distribution of antibiotic resistance genes (ARGs) in recycled water, particularly after it has passed through the distribution system, and to consider point-of-use implications for soil irrigation. Three separate reclaimed wastewater distribution systems in the western U.S. were examined. Quantitative polymerase chain reaction (qPCR) was used to quantify ARGs corresponding to resistance to sulfonamides

(sul1, sul2), macrolides (ermF), tetracycline [tet(A), tet(O)], glycopeptides (vanA), and methicillin (mecA), in addition to genes present in waterborne pathogens *Legionella pneumophila* (Lmip), *Escherichia coli* (gadAB), and *Pseudomonas aeruginosa* (ecfx, gyrB). In a parallel lab study, the effect of irrigating an agricultural soil with secondary, chlorinated, or dechlorinated wastewater effluent was examined in batch microcosms. A broader range of ARGs were detected after the reclaimed water passed through the distribution systems, highlighting the importance of considering bacterial re-growth and the overall water quality at the point of use (POU). Screening for pathogens with qPCR indicated presence of Lmip and gadAB genes, but not ecfx or gyrB. In the lab study, chlorination was observed to reduce 16S rRNA and sul2 gene copies in the wastewater effluent, while dechlorination had no apparent effect. ARGs levels did not change with time in soil slurries incubated after a single irrigation event with any of the effluents. However, when irrigated repeatedly with secondary wastewater effluent (not chlorinated or dechlorinated), elevated levels of sul1 and sul2 were observed. This study suggests that reclaimed water may be an important reservoir of ARGs, especially at the POU, and that attention should be directed toward the fate of ARGs in irrigation water and the implications for human health.

KEYWORDS:

antibiotic resistance genes, irrigation, reclaimed water distribution systems, water reuse
PMID:

23755046
[PubMed]

PMCID:

PMC3664959

[Free PMC Article](#)

1. ['Superbugs' found breeding in sewage plants](#)

news.rice.edu/.../superbugs-found-breeding-in-sewage-pl...

Rice University

Dec 16, 2013 - Tests at *wastewater treatment plants* in China revealed *antibiotic-resistant* bacteria were not only escaping purification but also breeding and ...

2. [Urban wastewater treatment plants as hotspots for antibiotic ...](#)

www.ncbi.nlm.nih.gov/...

National Center for Biotechnology Information

- [Cited by 43](#) - [Related articles](#)

Feb 7, 2013 - Urban wastewater treatment *plants* as hotspots for *antibiotic resistant ... plants* (UWTPs) are among the main sources of antibiotics' release into ...

3. [**Sewage treatment *plants* may contribute to antibiotic ...**](#)

www.sciencedaily.com/releases/2011/.../111207133042.ht...

Science Daily

Dec 7, 2011 - In an effort to determine the importance of municipal *sewage* treatment *plants* as sources of *antibiotic resistance* genes, the scientists studied ...

Dear Ms. Metzger and the SB Planning and Development Committee,

As residents of Sungate Ranch between Hollister, S. San Marcos Rd., and San Simeon, we are greatly concerned about the prospect of allowing cannabis to be grown in the Ag1 land which surrounds us. It has just recently come to our attention that this is a possibility.

Our home has no buffer to San Marcos Growers. Without leaving our yard we can touch their bamboo growing on the other side of our fence. They are just across the road from our home and the breeze travels over their plants before reaching our yard and home. To allow such planting would negatively impact our quality of life and ultimately property value.

We object to the plan to allow Ag 1 to plant literally in our back yard. The Lane farms and also the Goleta School property are also within viewing much less smelling distance of our home. The orchid farm is just west of Sungate fence line off of three of our streets which means those homes would also be impacted.

We are well aware that our pocket of Santa Barbara has a good deal of Ag1 land which of course is one of the reasons we were drawn to buying here.

Tempting these farmers on their farmland to grow cannabis plants which increase their income but have such negative effects on their neighbors is wrong. California does not need more cannabis. We understand there is already a glut of cannabis in California. We are a produce rich area which feeds the nation. Let the farmers farm that produce without the lure of growing a crop which has a negative impact on so many locally and even nationally.

We are also surrounded by schools and youth organizations which would reap the negative impact of cannabis. Behind our home is El Camino Elementary School. Across Hollister is Hollister Elementary School. Just down the street is San Marcus High School. These are only a few of the schools. The Salvation Army building houses a preschool, Girls Inc. is on Hollister just west of Turnpike. Page Youth Center, Discover Preschool, Vieja Valley Elementary School, the Seventh Day Adventist School and San Rafael Catholic school are all just a short distance from these Ag1 lands.

To have cannabis planted properties which in anyway could encourage our growing youth to become addicted to cannabis or impacted by its growth is wrong. As the voting adults and protectors in their young lives, we must object and stand strongly against this prospect.

We as adults are setting an example for all the youth who surround us within these schools and youth organizations. Rather than applying more security to combat possible theft of a much desired (illegal federally) substance, as our children's protectors, let's stand against this plan. As to the effect of added security to our quality of life, more lights and higher fences with loud alarms are another reason to fight!

Eric and Katharine Larsen
5000 Oak Ridge Rd.
Santa Barbara, CA 93111

Metzger, Jessica

From: G and K Nobis [gknobis@gmail.com]
Sent: Friday, August 11, 2017 1:23 PM
To: Metzger, Jessica
Subject: Concerns re regulation of cannabis in Santa Barbara County ("noLeta")

August 11, 2017

Ms. Jessica Metzger

Project Manager

SB County Planning Commission

Re: Farming of marijuana in SB County off Hollister--strong concerns (also related to production and sale)

Dear Ms. Metzger:

We live in Santa Barbara and consider Hollister Avenue where farms are ("noLeta") to be part of our neighborhood.

We are concerned about the negative impacts of pot farming in this area. Those impacts are health, environmental, and economic related.

We are also concerned about the process to regulate the farming, manufacturing, distribution and sale of pot. This seems rushed and not transparent to the public.

Some specifics:

1. This rush-to-regulate and allow new business seems rushed and for no useful reason. Plenty of pot is available. LA times reports that much cannabis is already produced in California, well in excess of current consumption. " ... the state's cannabis growers produce eight times the pot that is consumed in the state so some will face "painful" pressure to reduce crops under new state regulations that will ban exports after Jan. 1."

<http://www.latimes.com/politics/essential/la-pol-ca-essential-politics-updates-california-producing-pot-surplus-1501101923-htmlstory.html>

2. We have read the entire board of supervisors oversee and limit winery operations--already in rural areas. Why are only a small number (2) of supervisors involved in this planning?

3. Can the entire process of developing regulations be stated? It seems unknown.

4. Pot stinks up the neighborhood, as reported from Carpenteria. A recent business trip to Denver took me (Garth) past where pot is grown, with the inherent skunk odor.

- 39-3 | 5. Large amounts of electricity and water are needed. Where will this come from? Is it possible that growers will receive subsidies from the public? We think that could happen in California and not appropriate for the public to subsidize and bear the costs of another activity.
- 39-4 | 6. Other business processes and permitting take a "long time" in Santa Barbara County. Is the deveopment of regulation regarding this new industry moving too quickly?
- 39-5 | 7. Why not require that pot be manufactured in very remote areas, not near existing homes and businesses?
- 39-6 | 8. Existing homeowners will likely have resulting property value losses if pot farming moves into their neighborhood. We presume a smelly Marborg recycling facility would not be allowed in that area along Hollister--why are smelly and potentially dangerous pot operations being considered?

Thank you for the opportunity for us to present our concerns to you.

Best regards,

Garth and Kathy Nobis

3508 Chuparosa Drive

SB 93105

gknobis@gmail.com

Metzger, Jessica

From: Heidi Carver [sweet2654@yahoo.com]
Sent: Wednesday, August 09, 2017 8:25 AM
To: Cannabis Info
Subject: Cannabis Cultivation Thimbs Up

40-1 As a local community member, daughter, sister, granddaughter, friend.. Previously a hardworking caregiver, we need local marijuana stores, cultivation of any sort, dealing with a work injury, my case being denied for almost two years, with barely any medical, my medicines prescribed by a doctor for the chronic pain could not be covered, I was left to marijuana for nautiousness, pain and depression from being left with no doctor recommended treatment/MRI that were requested and denied, even though five doctors at least have tried recommending.. I am still left in my condition, and one of my only hopes, and ways of dealing, possibly permanently is by marijuana, start now by supporting this movement in Santa Barbra County..

Cruz, Patrick

From: Helen Larsen [helenlarsen79@hotmail.com]
Sent: Monday, July 24, 2017 9:21 PM
To: Metzger, Jessica
Subject: The marijuana industry in East Goleta

I am of two minds:

In order for us to have a strong community, state and nation, we cannot be side-lined by drug use. Instead, we should take the proper steps to ensure our own well-being, then our family's well-being, followed by the well-being of the community both near and far.

If a young person imbibes marijuana too early in life, that person seems to be side-lined and often rendered incapable by marijuana use, often followed by further drug experimentation. Even in the recent News Press there is an article regarding the early, untimely death of drug users whose body parts are being harvested to give longer life to others.

That's a classic upside to the downside!

Then again, the first time I knew about someone benefitting from the medical aspects of marijuana was when a friend was reluctantly subjected to chemo and was so sick from the chemo-therapy, that the only way he could eat was first to smoke marijuana, so his nausea was lessened. Folks who have pain, sleep troubles, muscles spasms, whatever, marijuana is a centuries-old, common antidote.

Therefore, I would vote for a careful study of the pros and cons. Seeing how Colorado is doing could be the first place to start. Maybe the state of Washington too. I would severely limit the whole marijuana industry as has been conjectured, away from schools, plus anywhere kids might be introduced to marijuana too early in their young lives. Eighteen and over, seems to be the best approach, so their brains have a chance to grow and mature, without being nullified.

Sent from [Mail](#) for Windows 10

August 11, 2017

Ms. Jessica Metzger
Long Range Planning Division
123 East Anupam Street
Santa Barbara CA 93101

Project Case Number 17ORD-00000-00004

Dear Ms. Metzger,

The purpose of this correspondence is to comment on the County of Santa Barbara's proposed Environmental Review of the Draft Land Use Policy.

I am the Founder of HERBL Distribution Solutions, a cannabis distribution company, that is interested in locating in the Carpinteria Valley, in the unincorporated area. Our mission statement is *"to make partnering with us exceptional by providing outstanding service & uncompromising quality assurance"*.

My background is in natural foods distribution as the President of United National Foods Inc, the largest natural/organic food distributor in the US, for over 10 years. I have entered the cannabis industry because I see many parallels with the natural foods industry.

Natural & Organic Product retailers in the US began as early as the mid 1930's in a few locations but did not see substantial expansion until the 70's. The stores were small (1k-3k sq ft), and focused on bulk foods, grocery, vitamins, and produce. When it began there were no "distributors" to choose from, all farms, manufacturers, and brands sold directly to the retail location. Distributors started cropping up in the mid 70's, offering to aggregate suppliers into a central warehouse, allowing retailers to consolidate their purchases.

Since the early 80's the distributor has been the central part of the supply chain and now most all products pass through a distributor prior to retail. This aggregate approach greatly reduces the environmental impact, as one truck visits a retail location replacing 50+ trucks if farms and brands were to ship direct.

42-1 Over the past two years, I have been traveling throughout the State, meeting with industry leaders and conducting research on the existing supply chain and new regulatory framework. I am currently exploring a variety of local jurisdictions and looking for the best local environment to locate my business from a tax and regulatory perspective. I understand the County of Santa Barbara is currently developing a land use ordinance and tax policy.

The opportunity for Santa Barbara County to support the cannabis industry cannot be overstated. Carpinteria in particular, has an enormous amount of pre-existing greenhouse infrastructure. These greenhouses have allowed cannabis growers to produce high quality cannabis, at a low cost per pound, at scale. Carpinteria also has corresponding pre-existing agricultural warehouse infrastructure that was previously used for flower processing, packaging and distribution. In my experience, this is truly unique.

Due to the volume of supply in the unincorporated area, it is critical for the sustainability of the local cannabis industry to permit a distribution facility near the supply chain.

All of the farmers I have been working with are growing cannabis in greenhouses on Ag-1-10 parcels. Similarly, all of the warehouse buildings I have been exploring for lease or purchase are located on Ag-1-10 zones. These buildings are prime for cannabis distribution because they already have the features necessary for the business, including power, roll-up doors, parking and secure locations, away from residential.

The County is currently proposing to only allow distribution on C-3, M-RP, M-1, M-2 zones. **There are no existing buildings that are available for lease or sale or suitable for distribution in those zones in the unincorporated area. Additionally, these zones are not in proximity to the existing cannabis supply. Therefore, the proposed draft does not appear to support establishment of a local distribution company – one of the most important licenses in the supply chain.**

Even if I were able to secure and permit a distribution building in a C-3, M-RP, M-1 or M-2 zone, additional (and unnecessary) impacts would be created due to the volume of transportation to and from the farm to the distribution facility – as opposed to permitting distribution on, or near, the grow operations.

It is also significant to note that the impacts of distribution are minimal. Because cannabis is a small agricultural product, semi-trucks are not needed to transport this commodity. In fact, our business will utilize small sprinter vans. Because of the high value and small nature of cannabis packaged products the footprint for a cannabis distribution facility is small, I only anticipate needing 5,000-10,000 square feet. By comparison, most products being distributed from an Ag zone today requires semi-trucks and the associated noise and pollution related to typical Ag product distribution.

Additionally, it is worthwhile to emphasize the significant role of distribution in the cannabis supply chain and the extensive regulations the State has issued for this license type. Distributors are responsible for quality control and assurance, tax collection, testing, and compliance with labeling and packaging requirements. The Bureau of Marijuana Control, Medical Cannabis Regulation, Initial Statement of Reasons reads as follows:

“Distributors play a pivotal role in the commercial cannabis supply chain. Ensuring a seamless transition from the cultivation and manufacturing of the product through the distribution process is key to a well-regulated market... The proposed distributor regulations are designed with three main goals:

- 1) To design a regulated system that provides the emerging industry the flexibility to properly provide medical cannabis goods in a safe and secure method;*
- 2) To ensure the medical cannabis goods are properly stored, handled, packaged and tested; and*
- 3) To ensure distributors keep and maintain records that are adequate to effectively track and trace the medical cannabis goods and thereby helping to prevent entry of untested medical cannabis goods into the legal market, and diversion of medical cannabis goods into the illegal or unregulated market.” – Page 3-4.*

The distributor is tasked with labeling and packaging compliance and coordination of product testing with a third-party compliance testing lab prior to transportation to a dispensary. Distributors will store product on their premise and work with the testing lab to ensure the product passes test before it is transported to a retailer. (Therefore, it is also essential that third party compliance testing labs are located near the distributor, and supply chain.)

Although the purpose of this letter is to focus on environmental impacts, it is relevant to highlight the potential economic impacts of permitting distribution. Not only do I anticipate hiring 30+ local employees, but also estimate generating anywhere from \$20M-\$50M revenue for the County, based on my knowledge of the local industry.

Lastly, distribution applicants who are not proposing building a new structure, or major structural changes or renovations to an existing structure, should be considered a permitted use and be required to apply for a ministerial permit. The County does not currently regulate transportation of other agricultural products – which is largely what this license type entails. For example, the County does not require a permit to distribute or transport wine from a vineyard to a tasting room/consumer. I would encourage the County to look to the City of Santa Rosa’s model ordinance – which requires a simple zoning clearance for distribution.

42-1
Cont. Industry leaders and regulators are concerned there will be a shortage of licensed distributors with the proper business acumen in 2018. Industry experts are seeing distribution as a potential “gap” in the supply chain. Therefore, it is vital that local governments support distributors, to ensure product can be safely stored and transported to the retailer, but also to maximize potential to capture revenue by domiciling the tax collection.

In conclusion, distribution is a low-impact license type that is fundamental to the continuity of the industry. Distribution will not increase use of water, or generate cannabis odors. Use of empty agricultural warehouses on small ag parcels for distribution is consistent with existing agriculture operations and will help prevent conversion of existing agriculture to non-agricultural uses. Cannabis distribution should be permitted on AG-1-10 zones to incentivize distributors to locate in the unincorporated area and provide a critical service to farmers and strengthen the local industry.

Thank you for your time and careful consideration of the issues I present above.

Michael Beaudry 8/11/17

Michael Beaudry
Founder, HERBL Distribution Solutions
(805) 420-2000
mbeaudry@herbl.com

Metzger, Jessica

From: CHRISTINA LEVEQUE [hcleveque@mac.com]
Sent: Thursday, August 10, 2017 6:17 PM
To: Metzger, Jessica
Subject: Cannabis

43-1 Ii strongly object to present buffer zone. It should be art lease 1200 feet between schools and cannabis activity.As a physician ,I understand problems associsted with breathing noxious fumes . Please review and accommodate concerns of local residents.
Thank you for your consideration in this matter.
Hubert Leveque M.D.

Sent from my iPhone

Cruz, Patrick

From: htjameson@verizon.net
Sent: Tuesday, August 08, 2017 5:45 PM
To: Metzger, Jessica
Subject: Comments on Cannabis Land Use and Licensing Seeking Prohibition of Storefront Outlets=Jameson
Attachments: Cannabis EIR and Land Use Ordinance Comments-Jameson-8-8-17.pdf

Dear Ms. Metzger,

I have attached my additional comments on the Cannabis Land Use Ordinance and Licensing Program supplementing my oral comments at the public meeting on July 27, 2017, in Santa Maria.

If you have problems with the PDF attachment or links, please let me know, and I can send a Word version in case that would work better.

Thanks for your information and help on this.

Yours sincerely,
Hunter Jameson

Santa Maria, CA

Additional Comments on Proposed Environmental Impact Review and Draft Cannabis Land Use Ordinance – Santa Barbara County

Supplementing Oral Comments at the July 27, 2017, public meeting in Santa Maria

Hunter Jameson, Santa Maria, htjameson@verizon.net

Date Submitted: August 8, 2017.

Seeking Continued Prohibition of Marijuana Dispensaries and Storefront Outlets

Marijuana use poses additional risks of addiction and harm for adolescents and young people compared with older people. (The Health Effects of Cannabis and Cannabinoids: The Current State of Evidence and Recommendations for Research, A report of the National Academies of Sciences, Engineering, Medicine. National Academies Press, January, 2017, <https://www.nap.edu/read/24625/chapter/13>; <https://www.nap.edu/read/24625/chapter/15>.) Measure 64, which legalizes recreational marijuana growth, possession, and use for individuals, recognizes this vulnerability. It forbids marijuana possession and use by youth under 21 years of age.

I urge planners and other county officials, including our supervisors, to use zoning regulations and ordinances to protect young people and our community and to assure compliance with the minimum age requirement of the law by strictly regulating retail sales, and continuing the current practice of prohibiting any marijuana dispensaries or other storefront outlets.

44-1

Although storefronts would not be allowed to sell to minors legally, storefronts would provide increased visibility and availability of marijuana for young people. We can learn this from the example of Colorado, which by a vote in November 2012 became one of the first two states to legalize recreational marijuana. Colorado already had a medical marijuana industry, which had been heavily commercialized starting in 2009, with many medical marijuana dispensaries. (See The Legalization of Marijuana in Colorado: The Impact, Volume 4, September, 2016, pp. 9-10, Rocky Mountain High Intensity Drug Trafficking Area, <http://www.rmhidta.org/html/2016%20FINAL%20Legalization%20of%20Marijuana%20in%20Colorado%20The%20Impact.pdf> . Following references are to the same work, except as noted.) However, after recreational marijuana was legalized (effective 2013) under terms very similar to California's Proposition 64, pot shops mushroomed. By the beginning of 2016, there were more medical and recreational pot shops combined in Colorado than there were McDonald's and Starbucks outlets combined (Legalization, p. 153).

The visibility of storefront shops and advertising they will generate will make marijuana use more attractive to young people and tend to normalize it. There is also evidence from Colorado that marijuana dealers are keen to attract young people, who are more vulnerable to addiction than older people, because young people will provide a continuing and increasing future market.

Evidence comes from the heavy marketing of marijuana edibles, such as marijuana candies, which are more attractive to young people than marijuana for smoking (see Thomson, Rod, “Where There’s Smoke,” Citizen Magazine, August 2015, p. 24, “Aiming at the Children,” www.focusonthefamily.com/socialissues/citizen-magazine/marijuana/where-theres-smoke)

Pot shops also make marijuana more available to young people. Even before recreational legalization, marijuana use by youth ages 12-17 in Colorado under commercialized medical marijuana already was high. The state ranked fourth in the nation for youth use in the past 30 days, according to 2011/2012 survey results (Legalization, pp. 37-38). However, after legalization of recreational marijuana, the state earned the unhappy distinction of becoming highest in the nation for youth use in the past 30 days in 2013/2014 results (ibid.). For 2014/2015, Colorado again led the nation, with youth use 55% higher than the national average (Supplement to Legalization, published March 2017, p. 7).

A survey in June 2016 of more than 100 school resource officers (most in high schools) asked where students who were found to have used marijuana got their supply (Legalization, pp. 46-47). Two-thirds said it was passed along to them from other people – friends who had got it from legal sources or, sadly, from parents. Legal sources surely would include Colorado’s more than 900 pot shops (as of January 2016). In addition, 8% of students got their supply directly from pot shops.

The survey also supplied proof that the argument that legalizing the marijuana market will end the black market is false. Almost a quarter of the students (24%) got their marijuana from the black market. To help curtail black market availability, please classify any transaction involving transfer of marijuana where money changes hands as a sale. Adults are permitted to “give away” marijuana to other adults under Proposition 64. Please prevent by ordinance the scam under which a non-licensed adult could sell marijuana by calling any payment received for it a “donation.”

Please do not add another channel of supply of marijuana for young people. Instead, please continue the current policy and prohibit marijuana dispensaries and other storefronts in the draft EIR and ordinances. In addition, please do not permit microbusinesses that grow marijuana to retail it. Also, please maintain the proposed draft EIR’s provisions that do not allow marijuana clubs. These establishments would allow a patron to buy marijuana, consume it on the premises, and then stagger out stoned to the driver’s seat of the car, posing a menace to society on the highway.

By prohibiting dispensaries and storefront retailing, you can protect our young people and community and promote compliance with the legal age limit. By doing so, you will be following, at least in part, the nearly two-thirds (63%) of Colorado counties that have used their authority to prohibit or impose a moratorium on recreational marijuana businesses (Legalization, p. 155).

Cruz, Patrick

From: Jackie Silverman [jackiehsilverman@gmail.com]
Sent: Wednesday, July 26, 2017 7:11 AM
To: Metzger, Jessica
Subject: Marijuana July 26th meeting

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Jessica Metzger,

I received a flyer at my front door yesterday in regards to a meeting that's being held tonight. As I'm sure you're aware, there is a coalition that intends to stop expansion of pot growth, manufacturing, testing, and distribution in the Santa Barbara area.

45-1 Your email address was included on the flyer and we were instructed to email you with pre-written comments, should we not be able to attend the meeting. That is why I am contacting you today, however my intention is to give verbal support for what the city is doing, not to rail against it.

I hope the local government continues to handle this as they have been doing, complying with the state law and making sure that a good local structure is in place before the law takes effect next year.

Hopefully others will also email their support or even show up to the meeting tonight.

Thank you for your time and good luck.

My Best,
Jackie Silverman

James T. Malone
Jeanne-Marie Malone
2585 Wild Oak Rd.
Lompoc, CA 943436
(805)735-7122

8/8/2017

Re: Marijuana Grows Environmental Impact

Jessica Metzger, Project Manager
Planning and Development Dept.
123 Anapamu St., First Floor
Santa Barbara, CA 93101

Dear Jessica:

We can't believe Santa Barbara County is even entertaining legalizing and growing marijuana. As retired law enforcement officers, the county does not have the best interests of its citizenry in mind, just profits.

Currently, marijuana is illegal to grow in SBCO, yet Cebada Canyon is being called 'Reefer Canyon' and our street, 'Reefer Ridge'. We moved here 18 years ago and are now being surrounded by marijuana farmers because, even while illegal, there is no oversight, no police presence and no prosecution. It is **FEDERALLY** illegal, yet no oversight. This is what we are seeing and/or what we are worried about:

- 46-1 • Ground water contamination; illegally disposed of chemicals, booby traps if you wander off trails, if you are brave enough to even go hiking; another 'Green Triangle' like Humboldt County.
- 46-2 • No control; growers everywhere and **NOTHING** is being done. Closed off hoop structures with no on-going inspections or enforced permitting processes.
- 46-3 • Excess power usage.
- 46-4 • Criminal element coming into the county from other areas and soon, if not already so, cartels, so that they can control who grows and who doesn't. More corruption to follow.

- 46-5 | • Enormous water consumption.
- 46-6 | • Reduction of property values; would you buy a home next to a marijuana grow?
- 46-7 | • Why no official notice that a property is applying for a permit, so protests can be heard from the affected neighbors?
- 46-8 | • Cash crop; federally illegal, so no FDIC insured bank will handle the money. Unsecured cash attracts more crime to the area, increasing burglaries on surrounding properties.
- 46-9 | • Local possible renters were frightened off a nearby property by armed men, telling them to get away from the area.
- 46-10 | • Increased traffic; increased smog.
- 46-11 | • Pet overdoses. Yes, the vet clinics are seeing marijuana pet overdoses.
- 46-12 | • Just this last week, we were told about a 300+ acre grow, in our canyon, with helpers wearing ankle bracelets in the fields, (where are there parole/probation officers?) and that numerous oak trees had been leveled to provide the growing area. Hmmmm, that's a pretty large grow to go UNNOTICED, by the county of Santa Barbara.
- 46-13 | • Loss of workers for legal agricultural farming. The farmers that have to obey all the laws, pay workman's compensation, etc, are losing half their workers to the marijuana growers, since it is an all cash crop, nothing is deducted. The workers get paid more and have to declare nothing.
- 46-14 | • We are afraid to leave our home to go anywhere and not worry about being burglarized while we are gone.
- 46-15 | • We don't want our family or grandchildren to visit, for their safety and they don't want to come for the same reasons.
- 46-15 | • When our well is either drained dry or contaminated, is the County ready for the deep pocket law suit?
- 46-16 | • If all these grows are illegal, the county is doing nothing about it and the county is not getting any profits now, do you really think they are going to try and BECOME legal and lose profits?

The county believes it can wrangle a herd of cats, if they actually think this is a good crop to allow here. The cons outweigh the pros.

Sincerely,

James and Jeanne Malone

Saturday, August 5, 2017

To: County of Santa Barbara
Jessica Metzger, Project Manager
Planning and Development
123 E Anapamu Street, SB CA 93101

From: Jan Baker, Santa Barbara Resident
P O Box 30268
Santa Barbara, CA 93130

Re: Rezone Small Farm Cannabis Growers to SB County Rural Area

47-1 For the Santa Barbara/Goleta residential neighborhoods on Hollister Avenue, I would like to petition that the small farms of San Marcus Growers, Lane Farms & the Avocado orchard be rezoned to grow cannabis in large quantities to outside of the communities of Santa Barbara, Montecito, and Goleta. These small farms are in residential neighborhoods with school children and families.

47-2 The practical solution would be to grow the cannabis pot outside the city limits, in rural areas that would not impact the quality of communities and schools. Reports from people in Carpinteria where these types of greenhouses have sprung up complain of headaches, burning eyes, not being able to go outside. With an invitation to a dinner party last December, we drove by the Carpinteria School on our way to our friend's home. The smell was terrible, but more importantly near the school.

On behalf of the residents in the Santa Barbara/Montecito/Goleta area, please reconsider the future quality of our communities to rezone to rural areas in Santa Barbara County.

Sincerely,

Jan Baker
(805) 845 - 5424
janbaker5440@gmail.com

Cruz, Patrick

From: Janet Booth [janetboothsb@gmail.com]
Sent: Tuesday, August 08, 2017 9:28 PM
To: Cannabis Info; Metzger, Jessica
Subject: Attention: Jessica Metzger

I am a concerned resident of Sungate Ranch where the proposed land use ordinance seems to be targeting our area in a very concentrated way.

I would like to propose that if SB County really needs the revenues that this Cannabis Industry will likely generate, that the draft Ordinance be amended to prohibit Cannabis Cultivation & Retail sales within 1 mile of Schools, recreational areas, parks & residential neighborhoods. Please take into consideration how growing Cannabis near our neighborhoods will affect quality of life in many ways:

The Horrible Skunk odor that cannabis gives off when growing will mean keeping windows closed & staying inside. Also growing Pot gives off chemicals causing headaches & burning eyes. And there are the safety issues because it's a cash business, Also the unsightly metal Greenhouses behind high fences will change the natural Beauty of our area & depreciate our property values, And lastly the most important fact is exposing our youth to growing Pot fields & retail shops in their direct walking path to schools. I would like to know if extensive studies have been done to see how Colorado, Washington & Oregon are handling the Pot explosion so we don't rush into this & make huge mistakes that can't be reversed. Thank you for taking the time to consider my concerns.

Sincerely,
Janet Booth
Janetboothsb@gmail.com

Sent from my

Metzger, Jessica

From: Janet Kruger [j1akruger7@gmail.com]
Sent: Tuesday, August 08, 2017 3:34 PM
To: Cannabis Info
Subject: rezoning matter:

To Whom and ALL It Concerns, and please forward to those involved in planning:

49-1 | I am emailing to voice a NO consideration to NOT letting small farms located in residential neighborhoods on Hollister Avenue (farms San Marcus Growers, Lane Farms & the Avocado orchard) be rezoned to grow cannabis in large quantities. These small farms are located in residential neighborhoods.

49-2 | I understand from areas that grow cannabis that *there is **an awful skunk smell from growing Pot***, so bad of a smell residents who live within several miles of fields don't open their windows. *From what I understand there are reports from people in Carpinteria where these types of greenhouses that have sprung up **complain of headaches and burning eyes!***

49-3 | Because of the above proven report of testimony, **the outcome of these small farms growing cannabis in a residential neighborhood would affect Quality of Life and the Environment.**

Note: This is NOT about whether cannabis should or should not be legal (it already is in California), or whether medicinal marijuana is helpful for treating medical conditions, nor is it about a person's personal right to smoke pot. **IT IS ABOUT LAND USE IN THE COUNTY, and particularly in the unincorporated area!!!!**

Thanks for your time and consideration of the impact of this matter.

Regards,

Janet Kruger

From: janet shaw [shepardmesaschool@gmail.com]
Sent: Monday, July 31, 2017 9:32 AM
To: Cannabis Info
Subject: Jessica PM regarding zoning changes

Dear Jessica,

We are writing to ask that you don't change zoning.. we are avocado and Cherimoya growers. Why is the county pushing to grow pot? The profit is very high for the grower so if course, greed and need to survive will encourage folks to go with the more lucrative product..

50-1

Sent from my iPhone

From: janet shaw [shepardmesaschool@gmail.com]
Sent: Monday, July 31, 2017 9:48 AM
To: Cannabis Info
Subject: Jessica regarding zoning

Second email to finish first email..

It seems schools and many neighbors wish to not have pot grown next to them..when growers destroy trees that have taken years to produce, flower growers refit there green houses... how will you ever get this turned around once the change is made? Most growers have been around for years.. Why is SB of all places enticing a 3 times your profit to change the wonderful heathy food we are growing now???? What does SB have to gain??? What about the future of food? The price of food when we have less growers? Isn't it high enough now??? Does growing pot save on water vs trees? No!!!! With growing pot comes security needed that is much greater then Avocados, citrus, and followers.. are we really pushing this??? Like we did housing in 2009-2012? Now 1000 permits..and all we hear is a water shortage?? My family has been here As SB volunteers, and involved to preserve SB since 1961... we need to get everyone on board and do the right thing..

Sincerely,
Janet

Sent from my iPhone

50-2

Metzger, Jessica

From: Jeanne Spencer [jeanne@ideaengineering.com]
Sent: Friday, August 11, 2017 4:52 PM
To: Metzger, Jessica
Cc: Fogg, Mindy
Subject: Comments on Proposed Draft Cannabis Use Land Ordinance

Thank you for requesting public comments. I am have been a resident of unincorporated Santa Barbara County, living near More Mesa off of Hollister and Puente Dr. for 8 years, and my neighborhood is likely to be significantly affected by the land use changes. I am also on the board of Vieja Gardens Owners Association, and while not officially representing them, my comments reflect concerns that I have heard from other board members and residents.

Comments:

51-1 **1) Please include restrictions on retail density.** This is of extreme importance to the perception of safety and community, particularly on Hollister Ave. between Hwy 154 and Patterson.

As an example of what not to do, a friend recently described visiting her mother-in-law in Colorado Springs and now seeing marijuana-related businesses averaging every 3-4 storefronts in that neighborhood, and how it no longer seems child- and family-friendly.

51-2 **2) Increase the buffer from sensitive receptors to at least 1000 feet, and add parks and libraries to the list.** You may also want to add adult residential care facilities, and alcohol and other drug treatment facilities.

51-3 **3) Add Signage restrictions to the General Commercial Development Standards.** This is going to be one of the most visible aspects of any retail businesses and like retail density, can have a major negative impact on the community.

51-4 **4) I'm not sure if included in this, but please do not allow on-premises consumption** at this time, due to concerns regarding impaired driving and youth access.

5) In general, please start slowly and review the impacts of changes on community health.

Overall, the draft document seems thoughtful and thorough, and I appreciate your efforts in including community involvement. I've worked closely with Ventura County and others regarding marijuana planning communications, including the Mapping Marijuana forums, so am very familiar with the complexity involved. In reviewing this, I've referred to documents developed by Ventura County. You're likely aware of them, but if not, please check out:

Protecting Our Youth: http://venturacountylimits.org/resource_documents/MJ_Protecting_our_Youth_Aug2015_1up.1.pdf

and other resources at: <http://www.venturacountylimits.org/en/prevention/marijuana/policy>

Best regards,

Jeanne Spencer

Cruz, Patrick

From: jimsvine@cox.net
Sent: Friday, July 28, 2017 7:25 AM
To: Metzger, Jessica
Subject: Marijuana & Goleta Valley

Jessica,

My family wanted to express their feelings about this issue. We do not support this "business" in any way. We think the people that do are only thinking about money and refuse to see that that this is a dangerous road

52-1 to go down. The negative affect and effects far outweigh people wanting to get high and those that want to profit from it. While there "might" be a miniscule number of people that truly benefit medically from it (???), we are aware of the negative and tragic problems that will arise. And for people purposely trying to manipulate the system behind closed doors, is unconscionable.

WE VOTE NO ON MARIJUANA!!!

Sincerely,

Jim and Karen Siffert and Family

Metzger, Jessica

From: Kathy Curtis [sheytanska@cox.net]
Sent: Wednesday, August 09, 2017 8:24 PM
To: Cannabis Info; jmetzer@countyofsb.org
Subject: Re: Cannabis Grown in the Turnpike Area-We request change-Please read.

To Personnel,

53-1 I'm writing this letter to address the issue of growing and selling POT in our local community. I object to the growth, processing and sale of POT in our neighborhood for many reasons, which I shall state. I reject the usage of POT for many reasons. Morally, I think it is wrong. How is it different than legalizing cocaine or methylenephthamine? Does POT smoking lead to other drugs? Even though many would say that there is a medical reason to use POT, I'm sure with all the vast medical advances in Science, someone could come up with a better painkiller. Medically speaking, our country is trying to get away from smoking anything due to the lethal effects from smoking due to lung and throat cancer and cardiovascular failure. Legally, I have to accept the fact that it was voted in by a majority and therefore is a law. However, laws can be repealed just like the GOP trying to repeal Obamacare. I have no illusions that the law will be repealed anytime soon. Politically it is no coincidence that only 3 states have legalized POT while 47 states have not. Maybe they know something that we do not know. Also politically, why is this process in such a hurry to be implemented before the public has had time to analyze the impact on individuals and the community. Two supervisors are railroading this process through whereas the other 3 supervisors are practically unaware of what's happening. This is like the GOP senators rushing a bill to repeal and replace Obamacare before any one has had a chance to read the bill. This is not democracy in action. Besides medical concerns there is also safety concerns. In Colorado a legalized POT state, auto accidents have gone up 20-30% since POT was legalized there.

53-2 There are also practical concerns to be addressed. I have lived in this area for 19 years and we have built up equity in our house. I don't want housing values to drop drastically just so someone can make a fortune selling POT. There is also a quality of life issue. I don't want to be smelling the awful odor of POT growing in the fields on a constant basis. There is also the crime issue. What kind of people will be hanging out in our neighborhood trying to buy or steal POT? And of course, there is the issue of young children in schools being exposed to all of these issues because of proximity of growing and selling close by. It is no accident that POT growth and processing is not taking place in Santa Barbara or Montecito or Goleta.

For all these reasons, I hope you think very carefully about growing and selling POT in our neighborhood. Because once the process is completed, we are stuck with the results for a very long time.

Jim and Kathy Sterken

Metzger, Jessica

From: Jim Taylor [jim@carpedata.com]
Sent: Friday, August 11, 2017 9:37 AM
To: Metzger, Jessica
Subject: Cannabis EIR Scoping

To: Jessica Metzger, Project Manager

Cannabis Land Use Ordinance and Licensing Program

Long Range Planning

County of Santa Barbara

Residents of the Carpinteria Valley have a right to fresh air that supersedes the right of a cannabis cultivator to vent terpene-laden odorous air to the environment.

The unique geography of Carpinteria requires special consideration in terms of odor control. What may be adequate mitigation in the wide open spaces of North County would be inadequate in the Carpinteria Valley due to the close proximity of residential neighborhoods to the cultivation operations. As an example of the level of odor control required in our situation, I refer to the San Luis Obispo Draft Cannabis Ordinance: "All cannabis cultivation shall be sited and/or operated in a manner that prevents cannabis odors from being detected offsite. All structures utilized for indoor cannabis cultivation shall be equipped and/or maintained with sufficient ventilation controls (e.g. carbon scrubbers) to eliminate or significantly reduce nuisance odor emissions."

54-1 The definition of Sensitive Receptors should include the denizens of residential neighborhoods. After all, a student spends more time at home than at school.

The arbitrary size of a buffer or setback between cannabis cultivation and adjacent land use is an indirect approach to mitigating the impact of emissions. Because atmospheric conditions are highly variable, it is more effective to preclude the release of odorous air in the first place.

Odors and other emissions can be measured. Ongoing enforcement of emissions control should be proactively monitored with instrumentation and not be complaint-based. However, there must be a simple method for neighbors to lodge a complaint, and for these complaints to be materially considered in the renewal of operating permits.

--

Jim Taylor
jim@carpedata.com

5563 Calle Ocho
Carpinteria CA 93013

408-666-7356

Metzger, Jessica

From: Joe Schuster [joeschu@cox.net]
Sent: Thursday, August 10, 2017 2:12 PM
To: Metzger, Jessica
Subject: Cannabis Growth & Distribution In Eastern Goleta Valley

Dear Ms. Metzger:

I would like to express my concerns over the issue of cannabis growth and distribution in the eastern Goleta Valley. As I watch the initial stages of our County's designing a plan for the scope and impact of the new cannabis industry in our neighborhoods, I have several concerns:

- 55-1 • There seems to be a sense of urgency to get marijuana ramped up as fast as possible. With big revenues on the line for the County, local entrepreneurs and outside interests, the urgency to get cannabis into our communities seems to be steamrolling the normal, steady, sensible planning practices we expect to be in play for a community game-changer of this magnitude.
- 55-2 • The private subcommittee approach of Supervisors Williams and Lavagnino to date breeds mistrust and very questionable motives, and an obvious skirting of the Brown Act. Is the public really expected to trust that this unconventional process is somehow in the general community's best interest? From here on out, everything pot related should be out in the light in the purview of all 5 Supervisors and under the public's watchful eye. Isn't that why we have established processes? Supervisor Wolf needs to be directly involved in the process as this is her District.
- 55-3 • Have County executives issued a mandate or inference that the cannabis industry must be allowed to thrive here to meet County budget issues? Everything on the table please. As with oil and developer interests, over time we have been careful and deliberate to not sell out our communities so select entities can get richer. What's different here? Established neighborhoods and historical quality of Santa Barbara life come first!
- 55-4 • As residents in Carpinteria have testified, pot crops stink and should be kept far from any established neighborhoods. All common downwind patterns should be examined.
- 55-5 • What is the effect on local businesses to have a pot establishment in the vicinity? How can it be allowed in a mixed-use area where there are residential dwellings? What about security, increased traffic, noise?
- 55-6 • Keep the industrial aspects of the cannabis business far away from established residential areas, including our local shopping centers. That means any growing, processing, packaging, warehousing of pot products should be in less populated, more remote areas.
- 55-7 • Don't rezone anything without taking time to study the effects the industry has had in Colorado. There is much information available that we need to take into consideration before allowing it into our community. We haven't invested years of our energies to build a great community here, only to recklessly throw it away because a very small amount of people think that we can't live without a thriving pot industry.

Land use is the issue here and must be studied carefully over time for the good of the huge majority of County residents who do not want cannabis to define our community, and have real concerns about the long-term effects of unleashing irreversible pot ordinances on our local culture and youth. The State has not given communities any deadline for rolling out regulations. Let's be careful. We need to know how our lives and safety will be effected and what the benefit and risks could be.

Thank you for your attention and time.

Sincerely,

Joe & Janet Schuster

5006 Oak Ridge Road
Santa Barbara, CA 93111

9 August 2017

To: Santa Barbara County Planning
Cannabis Land Use Ordinance and Licensing Program

From: John Culbertson, 4516 La Tierra Ln, Carpinteria CA 93013
jculbertson@sbceo.org

Comments to Environmental Scoping for the Cannabis Land Use Ordinance and Licensing Program

56-1 | **The document does not address the negative impact of cannabis operations in close proximity to housing, youth facilities, churches, parks and schools that are under separate jurisdiction from the County.** This is the situation in the City of Carpinteria. This is a health and safety issue in addition to the negative cumulative impact to the community.

Until this issue is addressed, the document should not be considered complete for the decision making process. (2.0, 4.1, 4.2, 4.2.7, 4.2.14)

Please expand the document to include the following:

56-2 | **Inform cannabis growers currently operating** within potential buffer and restricted zones that they will be required to shut down operations when permitting begins if they are within a buffer zone. County is in conflict with State and Federal law in allowing cannabis operations to proliferate during the planning process. This will undoubtedly result in lawsuits, inter-jurisdictional conflicts, and drawn out court proceedings.

56-3 | **Permits should not be grandfathered** for cannabis operations.

56-4 | **Establish 1000 foot set back / buffer zone** requirement from all housing, youth facilities, churches, parks and schools irrespective of County / City boundaries.

56-4 | **Cannabis grow operations within buffer zones should be shut down** through a specified enforcement process.

56-5 | **Notification of residents regardless of jurisdiction** before permit is granted to include public hearing and protest period. Notification should be to all residents within buffer distance.

Notification of school boards, youth facilities and all parents regardless of

- 56-5
Cont. | **jurisdiction** before permit is granted to include public hearing and protest period. Notification should be to school boards, youth facilities and parents for children in schools within buffer distance.
- 56-6 | **Odor and lighting mitigation:** No odor, harmful gas or night lighting should escape from greenhouses. Specify actual requirements and enforcement process. The current process is ineffective and not useable by the general public.
- 56-7 | **Restricted permit zones;** Public health, impact on children, water use, nearby residents, quality of life, questionable tax benefits and cumulative impact to communities services indicate the need for restricted zones near highly populated areas. The greenhouse area bordering Carpentaria schools and housing is one such zone.
- 56-8 | **Cumulative impact to communities. Government should do no harm.** Health, children, air quality, water, crime, organized crime, money laundering, homelessness, mental health, law enforcement, courts, traffic, housing, provision of local services, federal and state intervention, failure of county to handle less complex and ongoing agricultural issues in proximity to populations all point to severe local impact.
- 56-9 | Why any agency would inflict the kind of trouble seen in pot growing areas such as Garberville, Humboldt and Desert Hot Springs to the South Coast is beyond reason. The County Medical Officer warns of many negative health impacts and is developing an education program for children and “At Risk,” individuals to deal with the coming problems.
- The South Coast prides itself on its commitment to a clean environment and a welcoming atmosphere. We are dependent on tourism. Pot farming is industrial farming with all the side issues of the drug world coming to our community. If pot farming is allowed at all in Santa Barbara County it should be restricted to rural zones far from communities.

Cruz, Patrick

From: John De Friel [john@ccagriculture.com]
Sent: Wednesday, July 26, 2017 10:26 PM
To: Cannabis Info
Subject: EIR scoping follow up

Dear Jessica, Mindy, and Dan,

57-1 Thank you for hosting the public comment this evening. I look forward to continuing to work with you through the ordinance development process. Please let me know if I can answer any further questions for you.

Sincerely,
John De Friel

From: Julia Crookston [chefjuliainsb@gmail.com]
Sent: Thursday, July 27, 2017 2:42 PM
To: Metzger, Jessica
Subject: Marijuana industry EGV

I am personally against the use of marijuana as a recreational pleasure. As an employer I experience the effects of 'blazing' up' before coming to work every day and it makes me angry and makes me sad.

HOWEVER

Marijuana is here to stay.

It is an agricultural based business, just like orchid green houses, tree farms, strawberry fields and tomato fields and I say that Goleta (the County) should jump on this business right away. Goleta Valley, despite developers best efforts, remains an agricultural area and allowing the marijuana industry to establish itself here will help keep that ag culture alive.

Better green houses than crappy over built single family houses or stuffed to the gills lo-income apartments.

58-1

I want EIR, Coastal Commission and all procedures examined & permitted - just like any other business.

It is important for the County to be ahead of this as it is coming & nothing will stop it.

Now is the time to get in line for the potentially enormous tax revenues this industry will generate.

This a rare opportunity for the community, the kids, the firemen, the schools everybody to generate some real municipal income - not just money in an out of the area developer's pocket.

Bring it on!.

Julia Crookston

Cruz, Patrick

From: Von Jansma [vjansma@gmail.com]
Sent: Friday, August 11, 2017 2:47 PM
To: Metzger, Jessica
Cc: Wolf, Janet; Linda Brown
Subject: Large Scale Cannabis Cultivation, Distribution and Sales

Dear Ms. Metzger:

59-1 We are writing to you to express our concern about the process to develop a plan and ordinances governing the development of the cannabis industry in our county. There has been little public discussion or input on this topic. We are not opposed to the development of this industry, but we are concerned about the restrictions on the siting of such operations. In particular, it would be easy to inadvertently allow the intensive operations of the industry to occur in or near unincorporated areas which are primarily residential in nature. That would be inconsistent with good planning and zoning practises.

In order to develop a plan that avoids a conflict between residential and industrial, agricultural, and retail land uses there needs to be a thorough understanding of the nature of the cannabis industry segments to see if they are consistent with or compatible with other nearby uses. In particular there needs to be a study of:

- 59-2 - air quality issues, such as noxious odors from the plants, the harvesting process, and any industrial refinement or processing
- 59-3 - waste treatment for both biological and chemical waste
- 59-4 - light pollution issues from artificial lights running 24/7
- 59-5 - traffic increases and the accompanying noise
- 59-6 - security issues to safeguard crops and the large amounts of cash being exchanged in this industry which could attract crime.

59-7 The primarily residential area between Goleta and Santa Barbara could be adversely affected because of its relative density and the proximity of mixed uses if those issues are not properly understood and accounted for in trying to craft regulations. The area has schools, day care centers, medical facilities, senior centers, playgrounds and churches, all of which should be well isolated from large scale cannabis industry operations in order to avoid conflicts and assure quality of life. There seems to be little benefit to permitting cannabis operations in that area compared to the costs and risks that likely will arise.

59-8 In addition, we think that the process in this case would certainly benefit from having the knowledge of what has happened in other states in trying to manage the cannabis industry, especially vis a vis competing land uses. Nearer to home, we could benefit from the experiences of a community like Carpinteria which has had this industry operating on a smaller scale for some time. If there have been adverse effects there, the experience can be used to avoid making the same mistakes on a larger scale in the rest of the county.

Please take our thoughts and concerns into account as the process continues.

Sincerely,

Von Jansma and Linda Brown

385 Greendale Court, SB 93110

Metzger, Jessica

From: June Gill [junegill21@msn.com]
Sent: Friday, August 11, 2017 12:34 PM
To: Cannabis Info
Subject: rezoning for pot

Dear madam,

As a resident of the San Roque area of Santa Barbara I am anxious to see that discussions about rezoning for marijuana cultivation and sale are held in an open public forum before official decisions are made.

June Gill

Sent from my Verizon, Samsung Galaxy smartphone

Cruz, Patrick

From: karen friedman [notdeadyet0@gmail.com]
Sent: Saturday, August 05, 2017 6:29 PM
To: Cannabis Info
Subject: Avocados are posted and protected from theft

61-1 | Crop rustlers will be tempted by big money just sitting for the picking in a commercial grow. Just a reminder. peace

Karen Friedman
POB 942
Carpinteria 93014

Cruz, Patrick

From: karen friedman [notdeadyet0@gmail.com]
Sent: Thursday, July 20, 2017 5:18 PM
To: Cannabis Info
Subject: Non-Profit Tax-Exempt Cannabis Industry

62-1 Please consider the possibility that many profiting from this cash crop will not be paying taxes. Who is going to protect California's Organic standards from the blight of chemicals necessary for commercial use? Are there any requirements that dispensaries be ADA compliant not to exclude people who use wheelchairs? Patients have rights too!

Thank you for attempting to make recreational use a safe and positive experience for all. peace

Karen Friedman
POB 942
Carpinteria 93014

Cruz, Patrick

From: Karen Haddigan [karenhinsb@gmail.com]
Sent: Monday, July 31, 2017 2:57 PM
To: Cannabis Info
Subject: attention: Jessica Metzger

I am writing in connection to the idea of installing cannabis farms near residential areas. Until and unless the issues regarding smell from the growth of cannabis can be controlled, I do not believe this should be allowed so close to residential neighborhoods.

I do not oppose the new cannabis law - in fact, I support it. I simply want it not to cause problems for residents in the areas immediately surrounding the proposed growing locations.

Thank you for taking the time to read my submission.

Karen Haddigan
Santa Barbara resident

Cruz, Patrick

From: mozziemama@aol.com
Sent: Friday, July 28, 2017 4:04 PM
To: Metzger, Jessica
Subject: NO POT IN OUR city!

I URGE all the supervisors to put the BRAKES on this Shady, Unconventional process. All proposals MUST go thru the "Normal" channels, planning Commission.EIR review etc..

64-1

This stinks...I smell GREED....which seems to be running this sleazy show. Dirty money for those in charge is that it????
Wolf's flunkies making plans "Behind closed doors"the democratic way??????

STOP this Travesty!

Kathy Perrizo
6243 parkhurst drive
Goleta, Ca 93117

Cruz, Patrick

From: Kim Miller [kstar137@gmail.com]
Sent: Friday, July 28, 2017 10:57 PM
To: Metzger, Jessica
Subject: Marijuana growing, processing, and sale in the eastern goleta valley

Dear Ms. Metzger,

65-1 As a local schoolteacher for the past 27 years, I can attest to the very real negative effects marijuana use has on both youth and adults. I have never met a parent whose parenting skills were improved by the use of marijuana. I have never met a teenager whose academic success and self-esteem was improved by marijuana use. I challenge the County Supervisors who wish to promote marijuana zoning to find an elder person who can seriously reflect back on life and say, "My life and my impacts on my fellow community members would have been so much improved, if only I had drunk more alcohol, smoked more weed, and taken more drugs."

Please resist any and all marijuana production, processing and sales throughout Goleta and Santa Barbara. Especially, I am concerned about the Eastern Goleta Valley area since that is my own home area; please do NOT incorporate cannabis-related activities anywhere near our region.

Sincerely,
Kim Miller
652 S. San Marcos Road
Santa Barbara, CA 93111

Cruz, Patrick

From: kurt smith [kurt.kvsmith@gmail.com]
Sent: Saturday, August 05, 2017 10:14 PM
To: Metzger, Jessica
Cc: Wolf, Janet; barbk77@cox.net
Subject: Marijuana influx int eastern Goleta valley

To Whom It May Concern,

66-1 I was unable to attend the public meeting on July 26th, but I would like to express our concern over the issue of marijuana growth and distribution in eastern Goleta valley. I was born in Colorado and have family there today that have been directly affected by the unrestricted growth and sales of marijuana. It is not a pretty picture. My biggest concern is the growth within the populated areas of Goleta. Each of the "pot" fields will require security to protect the plants from theft. The fields will be lined with fences with razor wire and will have other measures (such as guard dogs, armed security, etc.) that can and will endanger the children and citizens of the area in a way that no other crop will do. Also, marijuana growth requires a large amount of water and will further stress the water supply. This issue has lead to some extreme measures (including stealing water, illegal wells, hauling water) in Colorado which has some of the same concerns with water that we have here in Santa Barbara County.

66-2 The dispensary issue has multiple red flags as well. The most important is the quasi-legal operation of the industry. Because the banks can not accept the money, the sales locations will have very large amounts of cash on hand, which is a crime and security risk as well. Unfortunately, previous experience (from family and friends in Colorado) has shown that the clientele and operators of these businesses have little respect for other businesses or anyone else in the area. Parking and access to the area are often taken advantage of with no regard for anyone else. Petty crime in the areas of the these businesses goes up dramatically with items disappearing from yards and fenced in areas. This is not a guess, this is a direct experience of multiple people in Colorado.

66-3 I oppose the growth of marijuana in any populated area especially in the Goleta area. I firmly believe that sales locations will be a significant burden on the local businesses and homes as well as requiring a increase in the local law enforcement resources that will out weigh the financial benefit of increased taxes. It is critical that any rules or laws that will affect the growth and sale of marijuana be given the proper public review and oversight. We need to know how our lives and safety will be effected and what the benefit and risks could be. Thank you for your attention and time.

Sincerely,
Kurt Smith
Hope Ranch Annex

Metzger, Jessica

From: Kyle Wolf [kylejwolf@gmail.com]
Sent: Friday, August 11, 2017 2:41 PM
To: Cannabis Info
Subject: EIR

67-1 To whom it may concern, thank you for all your hard work. I'm writing this in hopes to be able to obtain a local cannabis cultivation permit on my AG-I zoned property located at 2825 Baseline Ave Santa Ynez Ca. About 1,600 AG-I properties are located within the Santa Ynez Valley Community Plan area. Amazingly this is two-thirds of the total AG-I properties in all of Santa Barbara County. Almost 40 percent of the Community Plan area is zoned AG-I. In comparison there are only about 100 in the rest of the entire North County. About 95 percent of all the AG-I parcels in Santa Barbara Wine Country are in the Santa Ynez Valley. These wineries conduct high impact agricultural practices. They also conduct public wine tasting and commercial events every day all year long. My AG-I zoned property is within the Unincorporated Area of Santa Barbara County and the Right to Farm Act. It has an agricultural water meter and a 560 foot deep private well. It also has a private fire hydrant and is not located in a fire hazard zone. PG&E is in the middle of installing a agricultural electric meter. There is no home on the property. The property is not visible from any public road and checks off everything required on the County registration form. There is one million dollars worth of general liability insurance on the property. Please take into consideration that professional rule abiding AG-1 zoned properties would be a perfect fit for cannabis cultivation in Santa Barbara County. All the while becoming financial assets the County could count on.

Sincerely, Kyle Wolf

Metzger, Jessica

From: Lee Kell [lee@leekell.com]
Sent: Thursday, August 10, 2017 2:59 PM
To: Metzger, Jessica
Cc: jwolfe@countyofsb.org
Subject: STOP THE POT

Manufacturing cannabis along the Hollister Corridor? I seriously hope not. It just devalues communities and properties.

Hollister Road is too close to shopping centers, schools, churches and business's. All will suffer from odor, noise, light pollution and theft Growing and selling marijuana does not add to our communities, and is not beneficial to society.

Wish you would concentrate on the "ROUGH ROAD" areas...do not see any repairs happening.

DO NOT DESTROY PARADISE!

A concerned homeowner

L. Kell

Cruz, Patrick

From: Leisa Cosentino [lcosentino1@gmail.com]
Sent: Monday, August 07, 2017 9:29 AM
To: Cannabis Info
Subject: rezoning "Noleta" for pot-growing farms?

69-1 | I recently heard that there are steps underway to rezone the area known as "Noleta" to allow farms to grow pot on a commercial scale. I want you to know that I am vehemently against this proposal as it would devastate the neighborhoods with heavy traffic and smells.

Thank you,
Leisa Cosentino
Vintage Ranch Lane

Metzger, Jessica

From: Leo Elovitz [lelovitz@gmail.com]
Sent: Thursday, August 10, 2017 10:40 PM
To: Metzger, Jessica
Subject: Comments: Preparation of County Cannabis EIR

TO: Jessican Metzger, Senior Planner, Long Range Planning Division, County of S.B.

FROM: Leo Elovitz, 429 Thumbelina Drive, Buellton CA

It is understood that developing a comprehensive EIR for a projected cannabis ordinance in Santa Barbara County requires conservative evaluations across multiple environmental issues in order to address public safety and environmental protections and provide the County with justifiable legal protections. However, to be fair to all stakeholders (industry professionals, adjacent residential and commercial properties and municipalities) reasonable assessments need to be made with regard to water resources, traffic, property values, discharge of chemicals into air, soil and water, and odor. Since multiple license types, property sizes, zoning regions and mixes of adjacent parcel zones and municipalities can be vastly different for each applicant's business, it is crucial that the impact of distinguishing details be considered for each of these assessments:

I. WATER RESOURCES

There has been some concern voiced over the impact on the County's water resources and yet little scientific data has been presented for what constitutes actual water use. Request that you review water use by multiple factors:

- a.) land area (square feet or acre)
- 70-1 b.) grow duration (span of time for one crop)
- c.) number of crops per year
- d.) type of cultivation; outdoor, outdoor with hoops, green house, hydroponic, mixed lighting
- e.) total projected water use based on recent County Registry

Would like to see comparisons of total water use by other ag industries and crops, particularly the largest ag operations each year (berries, grapes etc.)

II. TRAFFIC

There has been some concern over the impact of different licensed operations (as defined by the State under MAUCRSA) on traffic on public roads. Please evaluate impact based on:

- 70-2 a.) licensed cultivation in Ag1, Ag2, commercial, industrial and mixed use zones
- b.) licensed cultivation with processing on the same Ag1, Ag2, commercial, industrial and mixed use zones

c.) licensed cultivation with processing and manufacturing on the same sight in Ag1, Ag2, commercial, industrial and mixed use zones

d.) licensed cultivation with processing, manufacturing and distribution facilities on the same Ag1, Ag2, commercial, industrial and mixed use zones

e.) licensed dispensaries in commercial, industrial and mixed use zones

70-2

Cont.

f.) license type(s) by square feet

I think the public should be able see data on projected traffic impact in each of these scenarios and comparisons to current practices from other existing types of agricultural operations by zone, size and number of operations within the same parcel: cultivation, processing, manufacturing and packaging (wineries in particular since they are abundant and process and package their harvests into alcoholic beverages on the same site).

III. PROPERTY VALUES

There has been some concern over the impact on property values in suburban residential areas (Goleta, Carpinteria) that are in proximity to cannabis operations. Would like to see any data that exists on “legal” operations and projections of what might be expected by future “legal” operations as defined under MAUCRSA and anticipated by the numbers provided in the County Registry. Factors to evaluate:

a.) type of operations: cultivation or mixed operations (cultivation, processing, manufacturing)

b.) sizes of operations in square feet

70-3

c.) number of crops per year

c.) proximities to suburban residents in feet

d.) dwelling densities in acres

c.) odor levels (if that can be measured)

d.) lighting levels during evening hours

Provide available data comparing other crop industries in the County with the same criteria.

IV. CULTIVATION ADDITIVES

By identifying the kinds of pesticides, fertilizers and soil amendments allowed under the requirements of MAUCRSA, evaluate impact from runoff and air disbursement based on the following factors:

70-4

a.) cultivation type: outdoor, greenhouse, indoor, mixed lighting

b.) operations: processing, manufacturing, packaging, distribution

c.) total square feet

d.) green certification

Provide comparisons to other crops and operations in the County on similarly sized parcels.

V. ODORS

Every cannabis business (license type) involved with cultivation, processing, manufacturing and packaging and distribution will produce varying levels of odor (or not) and operate in different surroundings and thus have differing levels of impacts depending on multiple factors. Provide assessments that compare the overall odor release from differing cultivations and operations (license types) based on measurements of the following factors:

- a.) total square footage licensed to operate
- b.) type of cultivations: outdoor, green house, indoor, mixed light
- c.) length of time of operations each year
- d.) number of crops per year per total square footage
- e.) proximity to dwellings by feet
- f.) amount of surrounding dwelling density by acre

Provide comparisons to other crops and operations in the County on similar factors.

August 11, 2017

Ms. Jessica Metzger
County of Santa Barbara
Planning & Development Department
Long Range Planning Division
123 E. Anapamu Street
Santa Barbara, CA 93101-2058

RE: Scoping Comments for the Cannabis Land Use Ordinance and Licensing Program EIR

Dear Ms. Metzger:

We spoke about our concerns about the proposed Cannabis Land Use Ordinance and the severe impacts that could result in Tepusquet Canyon at the EIR Scoping Meeting on July 27, 2017. We are also providing this letter of comments regarding the scoping of the Draft Cannabis Land Use Ordinance and Licensing Program EIR.

Tepusquet Canyon is an area with a unique character as well as severe geological and hydrological constraints. As a testament to its unique constraints, the Tepusquet Canyon Existing Rural Neighborhood is the only area of the County with tailored planning policies in the Comprehensive Plan Land Use Element (LUE p. 102-103) designed to prevent inappropriate development in the area.

The primary goal of the Comprehensive Plan Agricultural Element is the expansion and intensification of agriculture in areas *where conditions allow (taking into account environmental impacts)* for such expansion (Ag. Element Goal I). Tepusquet Canyon is not a suitable area for such an intensification and expansion of cultivation implied by the cannabis industry.

The scope Draft Cannabis Land Use Ordinance and Licensing Program EIR must fully discuss and analyze the various significant environmental impacts that would result in Tepusquet Canyon due to the cultivation and processing of Cannabis as follows:

1. **Impact Analyses**

a. **Geology/Soils**

71-1 Tepusquet Canyon is a documented area of geologic constraints and typically steep slopes. The Comprehensive Plan Seismic Safety Element identifies Tepusquet Canyon as having a Geological Problems Index of IV. The most severe Geological Problems Index rating is V. The geological problems identified include landslides, slope instability, and collapsible soils.

Ms. Jennifer Metzger
CLU Draft EIR Scoping Comments
08/11/17

71-1
Cont.

The rapid conversion of naturally vegetated or long-fallowed lands in Tepusquet Canyon to Cannabis cultivation can have a detrimental effect on surrounding areas threatened with downslope erosion, siltation, potential landslides, and other detrimental effects.

b. Hydrology/Water Quality

As discussed in the section on Geology/Soils, Tepusquet Canyon is largely located in an area of severely steep slopes. Stormwater control is currently hampered by this fact. Damage to downstream private property and public improvements such as Tepusquet Canyon Road due to flooding, erosion, and siltation are concerns during the winter storm season.

71-2

The rapid conversion of naturally vegetated or long-fallowed lands in Tepusquet Canyon to Cannabis cultivation can have a detrimental effect on surrounding areas exacerbated by increased stormwater resulting in erosion, siltation, potential landslides, and increased anticipated private property and public infrastructure damage.

Secondly, Tepusquet Canyon is not located over a groundwater basin or other reliable source of regional groundwater supply. Local wells drilled for limited domestic or agricultural uses are a hit and miss proposition, with well failures being common.

The rapid conversion of naturally vegetated or long-fallowed lands in Tepusquet Canyon to Cannabis cultivation would substantially increase the demand for irrigation water. This would severely tax the limited local water supply to unsustainable levels.

c. Transportation/Circulation

Tepusquet Canyon Road is the only public road access to Tepusquet Canyon. This is a narrow, windy road ill-suited to accommodate substantial increases in traffic anticipated with Cannabis cultivation and processing. Moreover, substantial numbers of large, cumbersome delivery trucks and agricultural equipment would present a vehicular circulation safety problem.

71-3

The analysis of transportation/circulation impacts should include a thorough review of an anticipated substantial increase of vehicular traffic and the introduction of a large number of larger trucks and agricultural implements. The analysis should not be a standard volume to capacity analysis, but should be tailored to the narrow, windy nature of Tepusquet Canyon Road and similar roads in the County and the traffic increase from existing including a turning-movement safety analysis.

d. Fire Safety

71-4

Tepusquet Canyon is located in an area of extreme fire hazard. In a wildfire event, fuels would burn extremely rapidly in the steep-sloped environment. Moreover, with only one narrow, windy access road, emergency ingress and egress would be extremely difficult during a wildfire.

The rapid conversion of naturally vegetated or long-fallowed lands in Tepusquet Canyon to Cannabis cultivation would add substantially to the population and vehicle traffic utilizing

Ms. Jennifer Metzger
CLU Draft EIR Scoping Comments
08/11/17

71-4
Cont. Tepusquet Canyon Road. This would severely hamper the ability for people and their animals to escape a wildland fire, while also hampering emergency vehicle access. This would make a dangerous situation even more so.

e. Programmatic Analysis

71-5 The Draft CLU EIR should completely analyze potential impacts from Cannabis cultivation and processing to this geologically and hydrologically sensitive area with limited road access and extreme fire hazards. Since this is a programmatic analysis, the tendency is to analyze the aggregate, or average, situation countywide. However, CEQA requires that the impact analysis be made on the 'reasonable worst case' scenario. Areas such as Tepusquet Canyon represent this worst case scenario.

2. Alternatives

71-6 The Draft EIR should analyze an alternative project description that would reduce potential impacts to areas of high environmental sensitivity or resource constraints in a programmatic way. This can be achieved by omitting certain areas of the County (Tepusquet Canyon, Toro Canyon, and/or sensitive coastal zone areas) from the effect of the proposed ordinance or instituting a more stringent Conditional Use Permit process on cannabis cultivation and processing in the identified sensitive areas. These sensitive areas have already been identified in the comprehensive plan. For example, the CLU could be tailored to be inapplicable to those properties mapped as having a Geological Problems Index of IV or higher in the Seismic Safety Element.

We appreciate your time in considering our comments. Please contact me with any questions.

Sincerely,


Linda and Curtis Tunnell

To: Jessica Metzger

From: Linda Muzinich

Re: Proposal to convert surrounding
agricultural acreage to Marijuana development

RECEIVED

AUG 09 2017

S B COUNTY
PLANNING & DEVELOPMENT

Dear Jessica Metzger;

It is with deep concern for my family and others living near the fields proposed for future growth of marijuana, that I am writing this letter to you. Please have an understanding of the content as if your home and family was across the street from the fields.

The following are issues that have a direct impact on our families comfort, safety, and security.

- 72-1 • The proximity of the fields, if marijuana is growing, emits a pungent, obnoxious odor that would penetrate our homes and yards.
- 72-2 • Schools and youth present in the area include: ;San Marcos High School, Hollister Elementary School, El Camino Elementary School, Girls Inc., Salvation Army pre-school and after school Care, and the soon to be build the Montessori Center School
- 72-3 • All of the children who spend much of their day at the above facilities will be exposed to the order, traffic (both vehicle and people interested in the marijuana) and a negative affect on their security.
- 72-3 • The population visiting the area, or loitering near-by include those: interested in purchase, stealing, and/or exchanging of drugs
- 72-4 • Neighboring children pass by the San Marcos agricultural field while walking to and from schools, the El Camino playground, and neighbors walking their dogs using the walk-way at the

end of San Simeon as a route to the Vons shopping center

- 72-5 • The growing of marijuana will have a direct impact on causing a devaluation of the secured appreciation of home owners near-by. In addition, the sale of homes near-by will be less than j desirable for families to purchase.
- 72-6 • It is a proven statistic that the crime in areas with the presence of marijuana growth has increased.
- 72-7 • I plead with you to give strong consideration to the severe impact a decision to allow the growing of marijuana in our area will have on the families nearby, the security of our families, and their comfort. Please base your decision on concerns of those most affected, and not on the financial rewards for the recipients of the growing, manufacturing, and distributing of the drug, or tax revenues.

Sincerely,

Linda Muzinich



162 Ranch Lane

Santa Barbara, CA 93111

(805) 455 3167

Metzger, Jessica

From: Linda Price [lgprice13@gmail.com]
Sent: Thursday, August 10, 2017 9:14 PM
To: Metzger, Jessica
Cc: Wolf, Janet
Subject: Cannabis Farming

Jessica,

73-1 As a former Goleta resident and currently a Carpinteria resident, I must write to let you know how outraged I am. This cannabis farming is out of control here in Carpinteria and now I hear Goleta and the surrounding areas are being threatened. Since when does an Ad Hoc Committee of 2 board members make decisions for the entire board. Where is the transparency? Buffering zones of just 600 feet, they need to be at least 1,000 if not 2,000. We are talking about our children here. Just the horrific smell in Carpinteria should be evidence enough. I hate to think family farms producing the world's finest produce will soon be producing a crop which poisoning minds. Pot prices will fall as produce prices rise because we have to ship the produce in from other countries.

Please I urge you, stop the madness!

Sincerely,

Linda Price

Metzger, Jessica

From: Lisa Overstreet [lisaosl@aol.com]
Sent: Friday, August 11, 2017 8:31 AM
To: Cannabis Info
Subject: Cannabis crops

Attention: Jessica Metzger

74-1 I'm writing in response to the Cannabis growing operation in Santa Barbara. Please have the Buffer Zone be extended to 1200 feet between schools and Cannabis operations!

Thank you,
Lisa Overstreet

Sent from my iPad

Metzger, Jessica

From: Marc Cosentino [marc.cosentino@gmail.com]
Sent: Friday, August 11, 2017 11:16 AM
To: Metzger, Jessica
Cc: Wolf, Janet
Subject: cannabis

75-1 I live in unincorporated Santa Barbara and am concerned about the upcoming cannabis regulations. I've read and heard about what happened in Ventura and want to make sure that it doesn't happen here. I'm concerned about the production and manufacturing, not the distribution, although I think a 1000 foot buffer zone from schools and daycare makes sense.

I'm concerned about housing values, and how placing the growing and manufacturing facilities could hurt the value of my home. I'm also concerned about the private meetings between the two supervisors (Williams and Lavagnino). We need more transparency, otherwise people will draw the conclusion that they two have their own agenda.

Thank you for your time.

Marc Patrick Cosentino
CEO / CaseQuestions.com



Cruz, Patrick

From: Marsha Messmore [caokie@aol.com]
Sent: Sunday, August 06, 2017 8:12 AM
To: Cannabis Info
Subject: Growing marajuana in residential areas

76-1 I am familiar with the negative Impacts that the harvesting and processing of the marijuana plants cause. I don't think that these areas should be in or near a residential setting. We have a lot of space in the hills that are far from homes and businesses that are more conducive to such activities. Please don't destroy the peace and beauty that is in our cities and neighborhoods. Put these types of business where they belong in the outskirts of populated areas.

From. Marsha.
I hope you dance

McCloskey Nursery

5030 Hollister Ave

967-1039

8/10/2017

Dear Santa Barbara County Board of Supervisors,

The McCloskey family has been farming 6.6 acres on Hollister Ave. for over 100 years. Our land has grown pampas grass, tomatoes, lemons, avocados, orchids, and other various crops. Our land has been rezoned three times and our well revised twice, as groundwater levels have decreased. Our neighboring ranches have all been developed, and we are now surrounded by track houses. We strive to be good neighbors. Our intent is never to be a nuisance, as we also live on the property.

Current markets, NAFTA, and environmental changes have made farming a difficult business to succeed in.

We currently use fish emulsion, manure, bees, and various fertilizers in our farming process, it can be stinky at times. That is a reality of life on a farm when you are zoned Ag. In order to continue in our farming legacy, we need to be allowed to grow any commercially viable crop. Our future generations rely on this.

Sensible guidelines for local growers are needed to ensure that small family farms remain in Santa Barbara County. Agricultural and residential communities can live side by side with your help and guidance.

Thank you for your consideration,

Kim Miller
McCloskey Nursery
5030 Hollister Ave
Santa Barbara, Ca 93111

Metzger, Jessica

From: M Mori [meg.mori@yahoo.com]
Sent: Tuesday, August 08, 2017 9:09 PM
To: Cannabis Info
Cc: M. Mori
Subject: Future of Cannabis Operations in Santa Barbara County

To: Ms. Jessica Metzger, Project Manager

78-1 I'm writing to protest the development and re-zoning of farmland surrounding Sungate Ranch residential neighborhood to allow cannabis farming at San Marcos Growers, Lane Farm & the avocado orchard.

78-2 While I respect the laws of California and Santa Barbara County, I personally do not like the smell of pot and would have to keep the windows closed if it were growing nearby. This would negatively impact my standard of living and enjoyment of lovely Santa Barbara!

78-3 Secondly, I am concerned about the environmental impact of pot farming. Since cannabis farming is fairly new, there isn't much research concerning it's effect on water run-off quality. I have attached a research article which suggests that it might impact steel head trout and chinook salmon. As you may be aware, Santa Barbara has been working to restoring the ecosystems of native steelhead trout in the past few years. And these lands drain to nearby Atascadero Creek. Therefore, I'd like to see an EIR on cannabis farming before moving forward.

<https://www.sciencedaily.com/releases/2016/10/161019173110.htm>

Please vote against re-zoning of these beautiful lands which surround Sungate Ranch residential homes, Girls Inc., elementary school, and Atascadero creek.

Best regards,
Meg Mori

Cruz, Patrick

From: Bozanich, Dennis
Sent: Saturday, August 12, 2017 6:52 AM
To: Klemann, Daniel; Fogg, Mindy; Metzger, Jessica
Subject: Fwd: Comments to Environmental Scoping for the Cannabis Land Use Ordinance

FYI

Sent from my iPhone

Begin forwarded message:

From: Merrily Peebles <merpeebles@gmail.com>
Date: August 11, 2017 at 10:47:44 PM PDT
To: cannabisinfo@countyofsb.org, dwilliams@countyofsb.org, Dennis Bozanich
<dBozanich@countyofsb.org>, Jwolf@countyofsb.org
Subject: Comments to Environmental Scoping for the Cannabis Land Use Ordinance

Dear Scoping Committee,

Growing marijuana will likely continue in the county, with new stringent controls. But the residents of Carpinteria Valley are concerned that growers *also* want permits to allow volatile extraction. This is not the same as making lavender oil using distilled water for extraction. This is the manufacturing of hash oil/wax using chemicals to obtain oil for vaping. Vaping is the preferred method for recreational use. It is big business and takes big monitoring. A grower can sell a pound of trim for x dollars (right now approx. \$2000) or make that pound into oil and sell it for, some sites say, almost 50% more (approx. \$3000). You can see why the growers here are anxious for the Zoning and Land Use regulations to change so that manufacturing can take place in Carpinteria Valley. This is a major change in ag land usage and does not seem necessary for the "growers" to make a very good living. This was their original concern, "lets change flowers to pot."

79-1

With the addition of manufacturing the character of the Carpinteria Valley changes. The county will make enough revenue without allowing Carpinteria to emulate struggling locales that are desperate to cater to anything that will add money to their coffers. At some point the county has got to put a brake on. Carpinteria is not an industrial center and not desperate. If the growers want to grow weed, with controls, that is one thing, but manufacturing and greed on their part is another.

This is my comment to help guide the future of cannabis operations. I would hope the County Supervisors, Land Use Zoning and the Santa Barbara County Coastal Zoning Ordinance would have a lot of push back on this desire of the pot growers to also manufacture oil in Carpinteria Valley.

Merrily Peebles
La Mirada Estates (where we smell the growing pot)

Metzger, Jessica

From: Michael Holliday [michael@dmhaa.com]
Sent: Tuesday, August 08, 2017 5:04 PM
To: Cannabis Info
Cc: Beverly Holliday
Subject: JESSICA METZGER - SB County Cannabis Policy Program Manager

Dear Jessica and SB County Planning Department,

We have lived and worked in Santa Barbara County for over 25 years. Although we work in downtown Santa Barbara each day, our home is located in a remote cul-de-sac neighborhood of 19 homes called Rosario Park located near the top of San Marcos Pass.

80-1 We are very concerned about any new ordinance that may allow any growing of cannabis in our remote rural neighborhood. We have young families and young children in our area along with a very limited water source supplying our entire community. Any ordinance which SB County develops should consider that remote rural neighborhoods like ours are not appropriate growing locations for cannabis. Several other mountain top communities have experienced recent problems with local growers bringing in outside vehicle traffic at all hours of the day and night, growing sites putting significant pressure on community water and roadway resources, as well as creating a neighborhood situation that can significantly devalue single family residential or residential ranchette (RR-5) property. Although we are fortunate to have some larger open properties in remote mountain top locations, the fire hazard created by additional traffic and smoking of any type along with the social pressure placed on the community by any cannabis cultivation effort would be a devastating blow to our neighborhood's quality of life.

Please do not approve any new SB County ordinances that would put our local rural neighborhoods at risk of becoming cannabis growing sites. Not only would this type of policy be a negative blow to the character and quality of our unique Santa Barbara rural communities, but also it would set the stage for neighborhood strife and conflict.... not what good planning policy should do.

Please feel free to contact me directly with any questions or should you need additional information.

Sincerely,

Michael

Michael Holliday FAIA, LEED AP
PRINCIPAL ARCHITECT



DMHA Architecture + Interior Design

1 N Calle Cesar Chavez, Suite 102
Santa Barbara, CA 93103
Phone: 805.965.7777

Email: michael@dmhaa.com
Website: www.dmhaa.com

August 10, 2017

County of Santa Barbara
105 East Anapamu Street
Santa Barbara, CA 93101

transmitted via email jmetzger@countyofsb.org

Re: Public Comment re Environmental Scoping Document for the Cannabis Land Use Ordinance and Licensing Program. Project Case No: 17ORD-00000-00004

Ms. Metzger,

Thank you for the opportunity to comment on the scope and content of the environmental information to be included in the Environmental Impact Report (EIR) for the Cannabis Land Use Ordinance and Licensing Program. As a current cultivator in Carpinteria, and a member of the Board of Directors of the Cannabis Business Council, I am supportive of the following provisions of the County's draft Cannabis Land Use Ordinance to be analyzed in the EIR:

- Allow cultivation on AG-I zones;
- Allow non-volatile manufacturing on AG-I zones.

However, I strongly urge the County to amend the draft Cannabis Land Use Ordinance to be analyzed in the EIR to:

1. **Allow distribution in AG-I and AG-II zones;**
2. **Allow testing in AG-I and AG-II; and**
3. **Allow volatile manufacturing in AG-I zones.**

Additionally, I would like to address the **permit level to be determined by zone:**

If the County is committed to regulating the cannabis industry, eliminating the black market, and capturing revenue, it is critical that businesses can obtain a permit within a timely matter. The County should require a **ministerial permit – not a discretionary permit** - for operators who are:

1. Utilizing existing agricultural infrastructure;
2. Not proposing new infrastructure or expansion of the footprint of their operation;
3. Proposing a similar, or less intensive, use than the previous use on the property; and
4. Simply changing a crop/change in use.

Obtaining a discretionary permit in Santa Barbara County can take anywhere from six (6) months to one year. If local businesses cannot secure local land use approval until late 2018 or 2019, the black market will continue. Compliant operators will not be able to compete with the black market, who will not be expending time and resources to obtain land use approvals. If the County's objective is to incentivize businesses to apply for and secure permits, applicants pursuing compliance should not be overly burdened.

Cultivation

Our greenhouse cultivation operation results in less environmental impacts than the previous use on the property (growing of gerbera and anthurium). We are utilizing the follow best management practices:

- 1) **Water** We capture and reuse 100% of our water. No water touches the ground. Drain water is captured, recycled and reused on the crop.
- 2) **Odor:** Perimeter odor control technology is installed around our entire greenhouse.
- 3) **Noise:** we do not use generators.
- 4) **Waste:** Our mulched is ground up and used as fertilizer. There is no waste requiring landfill.
- 5) **Public Services:** We have not had any incidents of theft or calls for fire or law enforcement. Our farm includes video surveillance, alarm systems, and fencing.
- 6) **Hazards:** We do not use pesticides, only beneficial predacious insects, which consume bad bugs. We use organic control methods for fungicides.
- 7) **Geology:** Our farm does not require any grading, terracing or vegetation clearing. We are using existing access road.
- 8) **Traffic:** Our operation results in less project related vehicle trips due to high volume that can be transported in smaller vehicles – compared to flowers. We estimate 70-80% less truck traffic pick-ups for cannabis compared to flowers. Previously used larger trucks ranged in size from 26-52 feet long.

Distribution

The recently signed budget trailer bill (SB 94) eliminated the “transportation” license type previously included in MCRSA. All transportation will now be regulated via a distribution license. Therefore, all cannabis businesses must either contract with a licensed distributor or apply for their own distribution license to transport product. In other words, a distribution license is required to transport cannabis product between license types or cannabis businesses.

Distributors are responsible for 1) arranging testing of product with a licensed testing lab prior to transportation to a retailer; and 2) quality assurance review to ensure compliant labeling and packaging. Distributors must store batches on their premise during testing, while the third party compliance testing lab obtains samples for testing, and transports those samples to testing laboratories. Cannabis must pass test before it can be transported to a licensed retailer.

The budget trailer bill also clarified that businesses can self-distribute their own product, or contract with a third party licensed distributor. Growers in Santa Barbara County should have the optionality to apply for a self-distribution license and transport product out of existing buildings on their property. Farmers are already transporting and distributing agricultural products out of existing agricultural buildings on small agricultural parcels in Carpinteria. **Distribution should be permitted on AG-I parcels.**

If growers decide to contract with a third party licensed distributor, instead of self-distributing, it is equally important for the distribution site to be located near the supply for efficiency and cost

81-2
Cont.

effectiveness. The vast majority of the supply/grows in Carpinteria are located on AG-I-10 parcels.

Due to the nature of the cannabis crop, impacts of transporting this product are minimal. Higher volumes of cannabis can be transported in smaller vans, compared to other agricultural product. In other words, large heavy-duty semi trucks are not needed.

Permitting distribution near, or on the same parcel as the grow operation will further decrease potential impacts, such as noise, air quality, and traffic – which would otherwise occur if the product was transported long distances from the farm/supply to the distribution site.

Distribution is a critical piece of the supply chain and barriers to permitting should be minimal. Limiting zones where distribution is permitted will handicap the supply chain in Santa Barbara County.

Testing

81-3

Starting in 2018, all cannabis product must be third party tested. Currently, testing is not required. For those who *do* voluntarily test their product, there is already a shortage of testing labs for the medical market. This will be compounded by new demand for adult use cannabis in 2018. It is vital that local governments make it as easy as possible to establish and permit as many compliance testing labs as possible. **This should include permitting third party compliance testing labs on AG-I parcels, close to the cannabis farms and supply.**

Under the new regulatory model, cannabis must pass test before it can be transported to a licensed retailer. The new testing regulations require extensive pesticide testing, among other analytes, including very low tolerance levels down to 10 parts per billion.

It is vital that third party compliance testing labs are located close to the cannabis supply and especially a distributor for efficiency. Otherwise, growers and other businesses will be burdened with transporting their product from the farm to the testing lab. This will increase traffic, and create other unnecessary impacts.

The footprint of a compliance testing lab is relatively small – due to the nature and size of the cannabis product – anywhere from 1,000 to 4,000 square feet.

There are currently agricultural testing labs located on AG-I lands in Carpinteria. Growers regularly test other agricultural products, such as lettuce and other products, for e-coli and other harmful contaminants. The infrastructure needed for cannabis testing labs, and the associated impacts, are no different than existing agricultural testing labs.

Testing laboratory licenses (Type 8) are prohibited from obtaining licenses in any other commercial cannabis activity. Therefore, I will not be applying for a testing lab license, but want to emphasize that they are a critical piece of the supply chain and barriers to permitting should be minimal. Limiting zones where compliance testing labs are allowed will bottleneck the supply

81-3
Cont.

chain, and ultimately hurt the consumer. Alternatively, increasing the number and capacity of testing labs is critical to ensuring that the public is consuming safe, tested product.

Volatile Manufacturing

The California Department of Public Health is the State agency responsible for regulating volatile manufacturing. Volatile solvent extractions must be performed in a closed loop extraction system, certified by a licensed engineer that the system is commercially manufactured, safe for its intended use, and built to code. Furthermore, the professional closed loop system and other equipment used must be approved by local fire code and meet required fire, safety and building code requirements. Volatile extractors must enact procedures regarding disease control, cleanliness, and sanitary operations to protect against contamination of products – similar to lab clean room standards.

The County is currently proposing to allow nonvolatile manufacturing on Ag-I zones, but not volatile manufacturing. The only difference between nonvolatile and volatile manufacturing is that volatile manufacturing can include chemical extraction using a volatile solvent. Most volatile manufacturers are proposing to use ethanol – not butane. Ethanol extraction is the same process that is used to extract essential oils – such as lavender, peppermint, and numerous other botanicals. Extraction of agricultural products is already occurring on small agricultural throughout Santa Barbara County.

81-4

The draft EIR includes a setback of 1,200 feet for volatile manufacturing. The County should analyze the impacts of volatile manufacturing within 600 feet from sensitive receptors – consistent with the rest of the license types. Given the stringent nature of both the State and local standards required to permit a volatile manufacturing facility, the risk to public health and safety is extremely low.

There is increasing demand for extracted products – as opposed to flower – such as oils, tinctures, and topicals. This demand will only increase as new consumers enter the market. Additionally, many medical patients, for example, cannot smoke flower due to serious health conditions and rely on other extracted products to ingest medicinal cannabis. Therefore, it would be shortsighted for the County to limit zones where volatile manufacturing is permitted, as there will be increasing demand for products produced via volatile manufacturing.

Volatile manufacturing also provides businesses with increased efficiencies and yields, compared to nonvolatile manufacturing. These include the ability to process wet trim and flower using ethanol extractions methods. This reduces time needed to dry product prior to extraction. **Growers should have the optionality to establish closed loop ethanol extractors on Ag-1 zones in existing agricultural buildings, near the local supply chain. Locating these systems near the grow operations will allow farmers to efficiently extract their product at a lower cost, faster.**

Alternatively, if the County only permits volatile manufacturing on AG-II zones, growers will have to transport their flower from the cultivation site to another location, which will result in increased impacts, such as traffic, noise and air quality.

Thank you for your consideration of our comments. Allowing co-location of the aforementioned additional license types is critical for the viability of the local industry, is consistent with current “vertically integrated” agricultural practices and most importantly, will reduce impacts such as traffic, noise and air quality.

Mike Palmer
P&B Land LLC
805-298-6453
palmermail@gmail.com

TO: County of Santa Barbara Planning Department
SUBJECT: Cannabis Land Use Ordinance EIR Scoping
DATE: 8-11-2017
FROM:

82-1

- Right to Farm
 - Under the Santa Barbara County Right to Farm ordinance, farmers are expected to have protections from nuisance complaints from adjacent residential properties. Furthermore, the residential properties are expected to know prior to moving in that nuisances will likely occur in the area, but that they have waived their rights to complain about it.
 - Under the Santa Barbara County Comprehensive Plan Agricultural Element it states that farmers have the exclusive right to choose which every crops they so desire to cultivate with no outside interference from the County. This supports the historical observation that Santa Barbara County farmers have been changing crops every few decades for over one hundred years. For example, the Santa Ynez Valley was full of dairy farms one hundred years ago, it moved to flowers and walnuts in the mid-1900s, and has since converted to grapes, broccoli, tomatoes, squash, and Cannabis.

82-2

- Economics
 - What is the total economic benefit added to the County from the hundreds if not thousands of jobs that have already been created in the Cannabis industry in Santa Barbara County? How many more will be created? How does this money trickle into grocery stores, real estate values, and other local economic benefits.
 - Through strong support for Santa Barbara County grown Cannabis, what is the increased tourism potential to the County. The Santa Ynez Valley already sees over one million tourists a year for wine tourism. Cannabis tourism will likely double this number. How does that affect hotels and restaurants in Santa Barbara County?
 - Santa Barbara County is already a strong agricultural producer, so the conversion of existing crop lands to Cannabis does not constitute development, but instead revitalization of existing agricultural lands & infrastructure. This revitalization trickles down to greenhouse materials suppliers, electricians, irrigation suppliers, etc...
 - Tax revenue in the County can go to offset a portion of the budget deficit and fund much needed programs that otherwise have no other projected funding source.

82-3

- Best Management Practices
 - Existing agricultural models in comparable crops should be considered in order to determine best management practices.
 - Water usage and conservation
 - Drip tape and/or drip irrigation should be utilized to decrease wasted water

82-3
Cont.

- Plastic mulch should be utilized when possible to decrease soil water evaporation
 - Hoophouses should be utilized to maximize yield and decrease disease pressure
 - Water ideally comes from Agricultural Irrigation Districts and is intended for irrigating crops
 - Organic fertilizer programs should be utilized when possible with practices to build soil tilth and fertility.
 - Organic Pesticide and Integrated Pest Management Programs should be utilized in order to prevent disease before it starts, keeping pest populations under control.
 - What production model is most similar to Cannabis production? Tomatoes, squash, strawberries, Gerberas, grapes, raspberries?
- Expansion of acreage
 - The registry is only self-reporting, how many acres of black market cultivation were not reported and will be decreased through increased regulation. Since a larger acreage than was reported is most likely, expansion of legal operators should be encouraged in order to decrease the persistence of the black market.
 - A cap on total canopy production should not be considered because this will allow black market operators to continue should the canopy cap be set below total market demand, which is difficult to gauge. For this reason, no canopy cap should be put in place and market forces should be allowed to drive the market and production. Additionally, since Santa Barbara County operators are competing on a state-wide marketplace, if another County allows production canopy greater than Santa Barbara County, it will either decrease the competitiveness and economies of scale achieved by local operators or it will incentive operators to leave the County in order to maintain competitive advantages and continue to scale their business. As the market develops, consolidation is likely as observed in all other commodity markets. This will require businesses to scale to meet demand.
 - Multi-premise parcels
 - Many operators in this County are already set up with multiple operators on a single parcel. The state has allowed for “Multi-premise Parcels.” The County should do this similarly, allowing an unlimited number of licenses on each parcel. For example, a single entity can have up to 4 acres of canopy, but that must be aggregated from 1-1 acre license, and 13-10,000 sq ft licenses, not to mention operators likely having a manufacturing and distribution license as well.
- Manufacturing
 - Type 6 and Type 7 licenses with appropriately built facilities should be allowed on both Ag I and Ag II for cultivators to realize their maximum return on investment.

82-4

82-5

82-5
Cont.

- Properly designed C1D1 facilities have relatively small foot print and are not dangerous. Most facilities have a 10'x12' footprint. They are designed nearly identically to paint booths and clean rooms for the microfabrication industries, both of which are present in Santa Barbara County.

82-6

- Distribution

- Distribution must be allowed on Ag I and Ag II parcels if cultivation is occurring on those parcels otherwise farmers will be required to have Commercially zoned facilities to have their own distribution. This will create an unreasonable burden on farmers and decrease their power at the market place, reducing realized revenues.

82-7

- Retail

- We would like to see a special retail license allowed for cultivators and manufacturers on Ag I/II , Industrial, and Commercial zoned properties to offer direct to consumer sales at appropriate facilities. This creates a tasting room like environment for the industry and supports the operators to realize increased revenues and profits by selling direct. It also encourages tourism and market presence of small local operators.

NATIVE AMERICAN HERITAGE COMMISSION

Environmental and Cultural Department
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
Phone (916) 373-3710



July 27, 2017

Jessica Metzger
Santa Barbara County
123 E. Anapamu Street
Santa Barbara, CA 93101

Sent via e-mail: jmetzger@countyofsb.org

RE: SCH# 2017071016; Cannabis Land Use Ordinance and Licensing Program, Countywide; Santa Barbara County, California

Dear Ms. Metzger:

The Native American Heritage Commission has received the Notice of Preparation (NOP) for Draft Environmental Impact Report for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code § 21000 et seq.), specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit. 14, § 15064.5 (b) (CEQA Guidelines Section 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared. (Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd. (a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a **separate category of cultural resources**, "tribal cultural resources" (Pub. Resources Code § 21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment (Pub. Resources Code § 21084.2). Please reference California Natural Resources Agency (2016) "Final Text for tribal cultural resources update to Appendix G: Environmental Checklist Form," <http://resources.ca.gov/ceqa/docs/ab52/Clean-final-AB-52-App-G-text-Submitted.pdf>. Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code § 21084.3 (a)). **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. § 800 et seq.) may also apply.

The NAHC recommends **lead agencies consult with all California Native American tribes** that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments. **Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a **lead agency** shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code § 21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code § 21073).
2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A **lead agency** shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code § 21080.3.1, subs. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or environmental impact report. (Pub. Resources Code § 21080.3.1(b)).
 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18). (Pub. Resources Code § 21080.3.1 (b)).
3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code § 21080.3.2 (a)).
4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code § 21080.3.2 (a)).
5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code § 21082.3 (c)(1)).
6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code § 21082.3 (b)).

- 83-1
Cont.
7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
 - a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code § 21080.3.2 (b)).
 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code § 21082.3 (a)).
 9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code section 21084.3 (b). (Pub. Resources Code § 21082.3 (e)).
 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
 - a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
 - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d. Protecting the resource. (Pub. Resource Code § 21084.3 (b)).
 - e. Please note that a federally recognized California Native American tribe or a nonfederally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code § 815.3 (c)).
 - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code § 5097.991).
 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An environmental impact report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
 - a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
 - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code § 21082.3 (d)).

This process should be documented in the Cultural Resources section of your environmental document.

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires **local governments** to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code § 65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code § 65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code section 65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county's jurisdiction. (Gov. Code § 65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have been already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.

- b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:

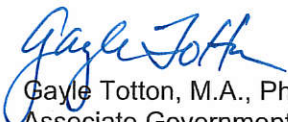
- a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
- b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.

- a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, section 15064.5(f) (CEQA Guidelines section 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
- b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
- c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code section 7050.5, Public Resources Code section 5097.98, and Cal. Code Regs., tit. 14, section 15064.5, subdivisions (d) and (e) (CEQA Guidelines section 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

Please contact me if you need any additional information at gayle.totton@nahc.ca.gov.

Sincerely,



Gayle Totton, M.A., PhD.
Associate Governmental Program Analyst

cc: State Clearinghouse

July 27, 2018

My name is Patricia Hansen. Four generations of my family have lived in Tepusquet Canyon. Our quality of life will be forever changed if cannabis growers continue to set up shop in our residential neighborhood.

84-1 There is a cannabis farm next door to me. Because of the large quantities of water used to grow the crop, I would like to see a limit on the number of operations allowed. Runoff from pesticides and fertilizers is a concern.

84-2 As you know, we are vulnerable to wildfires. The Alamo fire burned through a large portion of Tepusquet Canyon. Our road is narrow and winding and the potential increase in traffic and noise is a concern.

84-3 The lay of the land is steep and rugged. It does not strike me as good farmland. The growers will want to level and terrace the hillsides which could lead to mudslides during heavy winter rains.

Please give these concerns your utmost consideration.

Thank you,

Patricia Hansen

August 11, 2017

Ms. Jessica Metzger
Planning & Development
123 East Anapamu Street
Santa Barbara, CA 93101

Public Comment
Environmental Scoping Document
Cannabis Land Use Ordinance and Licensing Program
Project Case No 17ORD-00000-00004

The purpose of this letter is to ask the County to analyze third party compliance testing labs (Type 8) on Ag-1 zones. I currently operate an agricultural testing lab which is located on Ag-1 property. Our lab is located at one of our nurseries. We test weekly for Ecoli before we harvest our hydroponic lettuce and herbs. We also test our certified produce cooler monthly for salmonella and biannually for listeria. Testing onsite allows us to produce accurate and timely results to guarantee the safety of our products.

We would like to leverage our expertise by operating a cannabis third party compliance testing lab and provide an essential service to local growers, distributors and the public. We believe this new business offers the County a key opportunity to generate revenue. For the first time in 2018, product must be tested before sale. Therefore, there will be an enormous demand for testing labs that produce precise and quick results. The more local labs that are permitted, the more quality assurance for the public. Furthermore, in order to incentivize existing businesses to transition from the black market (no testing requirements), labs must be easily accessible to cannabis operators.

85-1

Testing labs should be permitted uses on agricultural parcels. Cannabis farmers and distributors will need testing labs located near the farms and corresponding supply chain. Per to the Bureau of Cannabis Control, testing laboratory employees must obtain samples for testing from a licensed distributor's premise, and transport the samples to testing laboratories.

Environmental impacts, such as project related vehicle trips, will be lessened if labs are permitted near the cannabis supply chain, and especially near the distributor. The more local testing labs, the more quickly distributors can verify that product (in its final form) meets test, and can be distributed/transported to the consumer. Distributors and labs will be far more efficient and cost effective if they are located in close proximity to each other.

There are existing agricultural buildings that are already being used to test agricultural product on small ag parcels in Carpinteria. We only need a small amount of building space for a cannabis testing lab – 2,500 square feet (maximum 5,000 square feet). We do not anticipate

85-1
Cont.

that changing the type of product we are testing in our existing building – from lettuce to cannabis – would increase any environmental impacts.

Local, third party compliance testing labs are paramount to ensure cannabis offered for sale is safe for human consumption. The Bureau of Cannabis has issued detailed standards for labs. For example, labs shall test for analyses of the following:

Cannabinoids
Residual solvents
Processing chemicals
Pesticides
Microbiological impurities
Mycotoxins
Water activity
Moisture content
Filth and foreign material
Heavy metals

Only high-level, compliant operators will be able to meet the proposed standards which include sampling procedures, testing-method validation, quality assurance, and laboratory personnel qualifications. Additional examples of provisions in the regulations include training requirements for lab agents who obtain samples, how samples are stored, statistically valid sample methods, minimum components of quality-assurance program, and record keeping.

Please allow us to continue to test ag products on small ag parcels in Carpinteria. Cannabis is just a new, more profitable crop. If appropriately regulated, cannabis has the potential to help preserve the agricultural character of Carpinteria. But in order to be a sustainable, and successful industry, the County must support the full supply chain.

Patricia Henmi
805-698-5933
henmipatty@gmail.com

Metzger, Jessica

From: Patricia K. [patricia.kohlen@gmail.com]
Sent: Tuesday, August 08, 2017 2:32 PM
To: Cannabis Info
Subject: Jessica Metzger: Objection to the proliferation of Cannabis growing areas in SB county

Ms. Metzger,

This is to express my dismay at the proliferation of cannabis growing areas in SB county which is spreading like weed.

There is little if no regulation of the cannabis phenomenon after the passage of Prop. 64 last November. People are doing what they want and greenhouses, which used to house lovely flowers, are being converted to marijuana hot houses, orchards are being ripped out, marijuana plants are being planted among avocados and olives - indeed on any plot of land available.

I am of the understanding that San Marcos Growers is selling to others who apparently have the intention to grow marijuana.

86-1 Really - there - in the middle of a residential neighborhood, close to schools. Have you considered the environmental impact - SMELL, DRAIN ON WATER RESOURCES, attractive nuisance for others, nightmare for neighboring property owners, increased traffic due to work going on and transporting the product, etc. etc?

Why is it that the County is lagging so far behind in regulating this industry? Surely the County of SB does not want a pot paradise such as the one at Nipton, where American Green Inc., one of the nation's largest cannabis companies, announced it has bought the entire 80-acre California desert town?

Sincerely,

Patricia Kohlen

3048 Calle Noguera

Santa Barbara, CA 93105

Cruz, Patrick

From: pattiruben@aol.com
Sent: Thursday, July 20, 2017 8:31 PM
To: Cannabis Info; pattiruben@aol.com
Subject: shepard mesa scents

87-1 When driving down Casitas Pass, to and from Shepard Mesa, there is a strong gross smell of weed, tilting a carefree community to frustration. Children comment on it; a 5 year old child held her nose and was instantly inquisitive. Long time homeowners are embarrassed to have out-of-town guests. I have disturbing headaches and others admit to the same. Is this the proud legacy of Santa Barbara county? If the objective is profit, the destiny is loss; a community divided, a real estate market marked and marred, and a interruption of a life's most basic necessity....the right to breath.

Patricia Ruben

Cruz, Patrick

From: Peggy Zachariou [peggy.zachariou@live.com]
Sent: Friday, July 28, 2017 2:06 PM
To: Cannabis Info; FredShaw@ci.carpinteria.ca.us; D, Dave
Subject: Quality of life near marijuana growers

Dears Sirs and Madams:

88-1 My husband and I own our home at 1480 La Paloma Street in Carpinteria where we have lived for about seven years. There are greenhouses behind the houses at the end of our culdesac. Frequently the odor outside our home smells as bad as if a skunk had sprayed nearby. I am pretty sure this is due to marijuana being grown in these nearby greenhouses. While some don't find this bothersome, I do, and in fact, sometimes I believe it is the source of stinging eyes and a dull headache. I am also concerned about chemicals, lights, and loss of my personal security due to the attraction of this industry to the criminal element.

88-2 I am opposed to the proximity of marijuana grow-houses to residential properties and schools. I would like to see a buffer zone between existing residential developments/schools and any commercial marijuana cultivation or any other commercial marijuana operation. Odor studies could be done to determine just how large the buffer zone needs to be, however, I would expect no less than 500 feet.

Thank you for your consideration of my concerns.

Sincerely,
Peggy Zachariou

Cruz, Patrick

From: Yahoo [rachael_n09@yahoo.com]
Sent: Monday, July 24, 2017 8:17 AM
To: Metzger, Jessica
Subject: EGV marijuana issue...

Mrs. Metzger-

The news about a proposed marijuana growing and or selling facility in Goleta Valley is disturbing to say the least. There is no way that we want a marijuana growing farm in our community. We don't want the retail stores or any part of the industry impacting our wonderful area of paradise.

89-1 The worst part is how it seems to be pushed through behind closed doors. The county has a process for land development for a reason. The general public deserves to know the actual intent for a proposed area, and what impact it will have in the surrounding areas before something is approved. It is extremely unnerving how this has been handled and scary as to how easy it is for the political leaders to push their own agendas. I'm disappointed and completely appalled at their new proposal.

I am out of town until late august but hope that this letter stating my opinion will help and matter.

Sincerely,
Rachael Amundsen
Sent from my iPhone

Cruz, Patrick

From: Randy Jones [rjones@westmont.edu]
Sent: Thursday, July 27, 2017 8:40 AM
To: Cannabis Info
Subject: Concern regarding marijuana cultivation

90-1 My name is Randy Jones and I am a 22 year resident at 5217 Cambridge Lane, Carpinteria, CA 93103. I am concerned about the practice of marijuana cultivation near neighbors, schools or residences, because of the distinct, pungent odor that permeates Carpinteria when the plants are in bloom. The odor is so strong in my neighborhood, that homes must be completely closed up to make a house habitable. This is more than an inconvenience, especially in the summer when windows need to be open in non-air conditioned residences. At a minimum I request greenhouses growing marijuana provide air scrubbers to eliminate all detectable odors from leaving the greenhouse. I would also discourage a requirement to use odor masking products that can be very sweet smelling but, are also annoying and cause allergic reactions.

Thank you,

Randy Jones

Cruz, Patrick

From: Riva McLernon [rivamclernon@gmail.com]
Sent: Wednesday, August 09, 2017 7:37 PM
To: Metzger, Jessica
Subject: Jessica Metzger, Project Manager, Cannabis in Our Community

I am a resident of Santa Barbara County and I am voicing my concern regarding cannabis cultivation, distribution and sales within our community.

My specific concerns include:

- **Buffer zone around schools, day care centers, hospitals, senior citizen centers to be at least 1500 feet**
- **Public safety concerns regarding the product and large amounts of cash on hand.**
- **Air quality/odor control**
- **Nighttime lighting**

In addition to the above mentions concern, I would also like to see more transparency from the Santa Barbara County Board of Supervisors. This would include disbanding the private 2 man ad-hoc committee of two Supervisors, operating in complete secrecy, to now be made up of the entire 5 member board. Also, the need for much more community involvement is imperative, which would include widely advertised open meetings for the public to learn about any impact studies, ask questions and to pose questions and voice concerns.

Cordially,
Riva and Kevin McLernon
4717 Calle Reina
Santa Barbara, CA 93110

Metzger, Jessica

From: Robert Lilley [robert.lilley@cox.net]
Sent: Friday, August 11, 2017 1:12 AM
To: Metzger, Jessica; Cannabis Info
Cc: Wolf, Janet
Subject: Cannabis common sense

Attention: Jessica Metzger

To the County Planning Commission and the Board of Supervisors:

The Santa Barbara *Independent* on August 10 published an article quoting Supervisor Janet Wolf's views on the cannabis industry [1]. The article seems to me to reflect some rational and common-sense thinking about accommodation in our county and our neighborhoods.

Land use is a key concern. Buffer zones of 1000 to 1200 feet surrounding any element of this industry are not unreasonable, given demonstrated impacts of growing, processing and selling this product -- noise, traffic, air quality and security to name a few. *Cannabis definitely must not be considered an "infill" opportunity*, where residents of established neighborhoods that just happen to have a vacant lot next door must fear those impacts on their daily lives and their investment in our community.

92-1 I urge the Planning Commission and our Supervisors to respond to our communities' concerns and craft the necessary processes by which property values and quality of life may be respected.

We are not under a state-mandated deadline to produce industry regulations, as I understand it. So, take the time to do this right! Allow time and place for discussion of the experiences in other states and localities, and recognize that many of the same issues they faced, both resolved and unresolved, are also our issues.

And it needs to be done in public. Open the closed doors and trust the full Planning Commission and the full Board of Supervisors -- and your fellow citizens -- to air their understandable concerns about a new industry and how best to deal with it. We've done this before with other industries and developments, so it should be second nature.

Thank you!

[1] Kelsey Brugger, (contact) "Wolf Urges Caution in Cannabis Regulations", *The Santa Barbara Independent*, August 10, 2017.

July 25, 2017

July 26, 2017

**To: Jessica Metzger, Project Manager
Cannabis Land Use Ordinance and Licensing Program
Planning & Development Dept.
County of Santa Barbara**

**Das Williams
Supervisor, First District
County of Santa Barbara**

**From: Roxanne Lapidus
1975 Cravens Lane
Carpinteria, CA 93013
805-684-4054
rlapidus@cox.net**

Re.: Comments on Scope of EIR for Cannabis Land Use Ordinance & Licensing Program

Here are my comments:

4.2.2 Ag Resources

Question: Will cannabis cultivation qualify as an agricultural activity as far as the Williamson Act is concerned? If not, then cannabis cultivation will definitely result in ag land being converted to non-ag uses. This in turn could pave the way for that land eventually to be taken out of any semblance of agriculture, since the question of whether or not a parcel has been “traditionally farmed” (even in non-ag zoning) is always considered when other (residential, commercial) development is proposed for the site.

On the other hand, if cannabis cultivation qualifies for continuing Williamson Act protection, it should be made clear that this does not mean that cannabis cultivation is protected by any “Right to Farm” ordinance.

California Health and Safety Code 11362.777(a) specifies:

“For purposes of this section and Chapter 3.5 (commencing with Section

19300) of Division 8 of the Business and Professions Code, medical

cannabis is an agricultural product.” The California Dept. of Food & Agriculture’s website adds,

93-1
Cont. | “The identification as an agricultural crop does not extend to other areas of the law. For example, cannabis is not an agricultural crop with respect to local ‘right to farm’ ordinances.”

4.2.3 Air Quality & Greenhouse Gas Emissions

93-2 | This is a major problem in Carpinteria. We know from first-hand experience that the 600-ft. setback from schools is inadequate. The ocean breeze carries the skunk-like smell across Foothill Road and into classrooms at Carpinteria High School every day. Neighbors in a wide radius of these greenhouse operations are experiencing headaches, stinging eyes, and even nausea. Setbacks should be prescribed not only for schools, but for residential areas and for any public gathering place, such as scout houses, churches, veterans halls, and the like.

There must be standards or at least research that shows what exact concentration of the different substances (cannabis itself, and any airborne/volatile products associated with the greenhouse operations) is noticeable / annoying / unhealthy / dangerous. (If there are no standards, these need to be developed.) Without that specific data, we are all (the public and the experts writing the EIR) just inventing numbers for required setbacks. The Air Quality Control District needs to be more pro-active in this whole situation.

4.2.7 Hazards & Public Safety.

It’s incredible that the County is considering allowing “manufacturing of volatile extraction” in areas zoned AG-II, M-1 & M-2. An article posted in Canna Law Blog on February 1, 2016 cautions:

93-3 | “The methods used to produce cannabis extracts involve complicated and precise techniques and often dangerous, volatile solvents, resulting in a risk of physical harm to the manufacturers and to those around them. In recent years, butane has been the most commonly used solvent and cannabis extracts produced using this method are also known as ‘butane hash oil (BHO).’ The major burn treatment centers at two hospitals in Northern California reported in 2015 that nearly 10 percent of severe burn cases were attributed to butane hash oil explosions, which was more than burn cases from car accidents and house fires combined.”

In Colorado and other states that have approved recreational marijuana, there has been a marked increase in traffic accidents, attributed to drivers who have used marijuana.

In the Carpinteria Valley, we have already seen crime associated with commercial greenhouse cultivation of marijuana. Marijuana cultivation is still a federal felony under the U.S. Controlled Substances Act, and strictly speaking, nationally insured banks can have nothing to do with marijuana-growing businesses. As a result, many of these cultivation sites operate on cash only. This is a huge temptation to thieves, as we have already seen here. Citizens of Carpinteria are deeply concerned about the possibility of organized crime moving into our valley.

93-3
Cont. | Note that one of the state's requirements for a cultivation license is that the applicant must "comply with prohibition of weapons and firearms at the cultivation site." This should be repeated at the County level.

4.2.8 Hydrology & Water Resources

93-4 | Despite last winter's rains, Southern California is still experiencing the worst drought in its history. One Marijuana plant reportedly requires 6 gallons of water per day. Do the math, and you'll realize that limits are going to have to be made on marijuana cultivation. Should cultivators qualify for the normal agricultural water discounts? Again, Marijuana is classed as an "agricultural product," not simple agriculture. According to the California Dept. of Food & Agriculture's website, "The identification [of marijuana] as an agricultural crop does not extend to other areas of the law." Agricultural water and water rates should be reserved for crops that put food on the table. Otherwise, we're headed for disaster, with our limited water supplies being drained dry for profit by self-styled "bio-entrepreneurs."

4.2.9 Land Use & Planning

93-5 | We have already seen land-use conflicts related to cannabis cultivation in the Carpinteria Valley. While such cultivation admittedly takes place on land zoned for agriculture, these sites are nevertheless adjacent to residential areas. There's no denying that there's a difference between living next to open field ag or orchards, and living next to greenhouses that vent the skunk-like smells of marijuana 24/7. Residents complain about a drop in property values, about health concerns, about unacceptable night lighting, about a diminished quality of life. Ideally, cannabis cultivation should have it's own zoning, far from populations, but obviously it's too late for this. However, it is not right that people who have invested in homes in the expectation of living peacefully there should suddenly be subjected to these annoyances and have their quality of life degraded by a neighbor's desire for profit in this new industry. Many would see cannabis cultivation as a Public Nuisance.

As for the complaints about night lighting, the Carpinteria Valley Greenhouse Program, certified by the California Coastal Commission in 2004, requires "blackout screens for any greenhouse structures designed to include interior cycling lighting." To date, some Carpinteria greenhouse growers have not been scrupulous in complying. Anyone driving at night along route 192 (Foothill Road) in the area of Carpinteria High School can see lighting in greenhouses south of the school. Even worse are certain greenhouses north of Via Real and West of Cravens Lane. Since they are hidden from sight from public roads, their owners assume that no sees the nighttime lighting. But on foggy nights, there is a huge orange glow over these areas, visible throughout the valley. This is not acceptable, especially in these days of heightened awareness about nighttime "light pollution" and how it interferes with enjoying the wonders of the nighttime sky.

4.2.11 Public Services

93-6 | The project will clearly make more demands on police and the fire department.

93-6
Cont.

See above, 4.2.7 Hazards & Public Safety, for concerns about the manufacture of volatile marijuana products, the problem of impaired drivers, and the increase in crime associated with this lucrative business.

4.2.14 Cumulative Impacts

93-7

The greatest cumulative impact is to our water supply. Clearly, not every entrepreneur who wants to grow marijuana in Santa Barbara County will be able to do so. The County will need a clear plan for accepting or denying applicants, and will need to work with the various water districts in establishing guidelines that will dictate how many plants can be accommodated before “sustainability” is jeopardized.

Finally, a few words of perspective:

The County is now embarked on this onerous and costly process because “the people have spoken” in the November 2016 elections. But many who voted to legalize recreational marijuana use did so mainly to end its criminalization, and free up the jails from such minor offenders.

Few foresaw that this vote would “open up Pandora’s Box,” with “bio-entrepreneurs” flocking to the state and demanding the “right” for everything from on-site “tasting rooms” to the manufacture of an array of ever-more potent cannabis products. Only the County can reign in this self-interested frenzy. I urge you to adopt strong guidelines, backed up by strict enforcement. Santa Barbara County has an international reputation as a desirable place to live and as a tourist destination. Don’t let a vociferous minority hijack our lifestyle and our reputation.

Cruz, Patrick

From: ruizsblaw@cox.net
Sent: Thursday, August 10, 2017 7:00 AM
To: Metzger, Jessica; Cannabis Info; Williams, Das
Cc: Wolf, Janet; Adam, Peter; Hartmann, Joan; stevelavagnino@countyofsb.org; Allen, Michael (COB); sbcob; Lea@coastalview.com; Nick@Independent.com
Subject: Cannabis Land Use Ordinance and Licensing Program EIR

I am a resident of the City of Carpinteria, my residence address is 1483 La Paloma. I am submitting these Comments to formally respond to the NOP and Scoping of the EIR for the referenced Project. I have reviewed the material on the website and I attended the Santa Barbara Scoping meeting.

CEQA requires that you consider the expertise of Commenters in assessing their Comments so I will provide a brief introduction on my local land use and CEQA expertise. I was General Counsel for the Goleta Water District for about 20 years, late 80's through 2007. In that capacity I reviewed and was engaged in just about every Goleta area EIR prepared in that time period. I served on the City of Santa Barbara Water Commission for about 10 years where we had authority to review and approve all water and wastewater related CEQA documents. My name will forever be stated in the California Supreme Court Reports under the case, Citizens for Goleta Valley vs. the Santa Barbara County Board of Supervisors (the Hyatt/Bacara case, a landmark CEQA case). I was on the local Steering Committee for the initial Cachuma Contract Renewal in 1995 where we oversaw, managed (and paid for) the EIR/EIS prepared for that Project. That EIR addressed, among other matters, local Commercial Agriculture using Cachuma Water. I have worked on several Community Plan EIRs including the Goleta Community Plan, the first City of Goleta General Plan, the most recent City of Santa Barbara General Plan Update, and the 1990 and 2010 UCSB LRDP EIRs.

Considering that background, much of it representing local public agencies as a Staff member, I understand the challenges presented by the unwieldy Project description for this EIR. You are tasked to address issues related to retail sales, off cultivation site processing, manufacturing and distribution, hemp growing (?) and the issue that I am interested in, cultivation in the Carpinteria Valley on lands that are zoned Ag and are and have been in production. It is my strong legal opinion, based on my professional experience and as a lifetime South Coast resident (my 10 year old daughter is a 9th generation South Coast resident), you need to do area specific analysis if you are to prepare a valid and adequate EIR for this Project. At the Santa Barbara Scoping meeting I heard East Goleta activists upset about something they have heard proposed for their neighborhood. More power to them but that has no application to the issues of cultivation by established farmers, in the Carpinteria Valley. I do not want the underlying anti-cannabis perspective by some in our community to inappropriately "flavor" the result of this matter in the Carpinteria Valley. If our long established local family farmers want to grow cannabis legally, please let them be successful. I will explain why I believe it is one of the most critical environmental issues pending on the Santa Barbara County South Coast today. Likewise, I have read about the controversy in Tepusquet Canyon. Good luck with that one but that also has absolutely nothing to do from a CEQA perspective, with the issues in the Carpinteria Valley.

I propose that you have a Section of the EIR dedicated to a CEQA analysis of the "impacts" on the longterm viability of Carpinteria Valley Commercial Agriculture, and those established farmers who have identified an interest in sustaining Commercial Agriculture in the Carpinteria Valley with the cultivation of cannabis, from the implementation of County regulations proposed here. An obvious baseline would be to analyze the difference in impacts to Commercial Ag longterm viability with no County regulations over and above those already established by the State, compared to whatever levels of regulation may be proposed by the County. My practical issue is that I want the County and its decision makers to weigh the

94-1 Cont. benefits of sustaining Commercial Agriculture in the Carpinteria Valley, and where the line is drawn where proposed regulations may make the Commercial endeavor of being a successful cannabis farmer in the Carpinteria Valley, infeasible.

As we all know cannabis odor has become an issue in Carpinteria. I have been following these matters closely since the November election and several local social media participants have been very vocal and aggressive in the discussions. As the County has already established, some of these odor complaints have been the product of mistakes, County inspections have determined that some of the reports targeted properties where no cannabis cultivation is occurring. I do not question odor reports from my immediate neighborhood, and all that area on the mountain side of El Carro in the immediate vicinity of the Everbloom greenhouses. Look at Google Maps how close my backyard is to Everbloom. I know what cannabis cultivation smells like. I have never smelled it from my residence. I invite County staff to visit my backyard for a couple hours or as you wish, and determine for yourselves if you detect any unpleasant odors. I assume there is no such device yet that can detect cannabis odors, if there is one, I invite the County to install one in my backyard.

My goal here is to promote a Carpinteria Valley specific EIR analysis with appropriate alternatives, so the decision makers have all the information necessary to consider the impact on longterm Commercial Ag viability in the Carpinteria Valley, from any County regulations proposed. I want us to avoid the anti-cannabis hysteria that is unfortunately rampant in these debates today. I understand people are going to be vociferous in their opposition to retail sales in their neighborhoods. God bless them, that has nothing to do with the CEQA issues related to cultivation on existing producing Ag lands, in the Carpinteria Valley.

94-2 In following the local social media on these matters, I saw one participant encouraging others to submit to him odor reports, and he would bundle them and submit them to the County. I hope County staff rejects that approach. Those comments have no credibility and it would require a big waste of our time and County time and resources to respond to that. You have made it simple enough for any individual who is interested, to participate as an individual resident. In the course of these social media discussions, it has become apparent that in certain parts of the City of Carpinteria, backyard personal grows are proliferating and generating all the odor complaints on the ocean side of the Freeway. It is my opinion that existing Commercial cannabis cultivation cannot be smelled by any residents on the ocean side of the Freeway but of course many people on that side have registered odor reports. I believe today the County knows just about every existing Carpinteria Valley Commercial cultivation site and the analysis of odor reports should follow accordingly. For those who live next door to a large facility, yes, that can be credible. For those who live a mile or more away from a known facility, mistake, exaggeration, and/or anti-cannabis hysteria.

And that begins to raise what I expect in Carpinteria will be a decisive issue, how will odor be regulated and what will that cost the farmers to comply? With my background in local water I know better than most the challenges of making and meeting water quality regulations that require measurements and have criteria in parts per billion. I know how much it costs. I know we need to be reasonable and informed as we make these decisions on this subject because the preservation of Commercial Ag in the Carpinteria Valley is a significant County of Santa Barbara environmental issue and we need to get this right. How is odor regulation going to be implemented? What will the offsite odor criteria be? I have stated that I have never smelled any cannabis cultivation from my residence and I live just a few hundred feet from Everbloom. Of course we have people residing at or near the beach who swear they smell it all the time. How will these regulations be monitored and enforced, who will do it, how much will it cost, and how is it paid for? I know some in the County are counting on significant revenue from the cannabis industry, but if you do not allow the farmers, who do in fact know what they are doing, to be financially successful, they are not going to generate any revenue for you. There is a sense among people who know little or nothing about the cannabis industry, that it will be a guaranteed gold mine for any farmer who tries to cultivate. On a Statewide basis we

94-2
Cont.

are just starting to see what it will look like and we know that eventually there will be tremendous competition from big business and the price of cannabis will inevitably go down from here. Yes Carpinteria poses some challenges that can be reasonably met. But we need to allow our farmers to successfully compete with what we know will be less regulated farms in other parts of the State.

94-3

My background in local water had me working with Goleta and the remnant Santa Barbara farmers that we have left, for 30 years. Some of the old time Goleta farm families have "children" my age who I have known since High School. Preservation of Commercial Ag was a recurring theme in many of the Goleta area EIRs I worked on. Local Ag that uses Cachuma Water was a driving issue in the 1995 Cachuma Contract Renewal and supporting Ag was critical to our negotiations to get the Federal Government to give us a better "Ag" water rate and interest concessions. Preservation of Ag will again be a critical issue that I will promote as we get into the next Cachuma Contract Renewal which the County has already initiated and will manage. Much like the odor issue but with a lot less credibility at least as it may apply in the Carpinteria Valley, there have been claims about how cannabis cultivation will use huge and unreasonable amounts of water. This is again area specific but in the Carpinteria Valley where for the most part we are talking about existing farmers converting crops from cut flowers to cannabis, I expect there will be no increase in water use. It is important that you address this issue and put it to bed because it is too easy for the hysteria mongers to use without reliable scientific information on the subject. I am sure our Carpinteria farmers who are currently legally cultivating cannabis can tell you exactly what the numbers are. I hope you understand that our established Carpinteria family farmers are some of the most efficient Ag water users on the face of the Earth. In the Scoping Document at 4.3.13 Public Utilities, it begins: "The Project would increase demand for water ... " Again area specific and in the Carpinteria Valley I expect that is not an accurate statement. You should not make statements like that at this juncture on a controversial matter without reliable evidence in the record to support it.

94-4

I also believe it is entirely speculative to assume what level of new cultivation we may see here. As touched on above, there will be tremendous competition from areas of the State where property is much cheaper and the regulation of Agricultural is much less onerous. I do not expect to see any significant new greenhouse development. Initially I expect almost all major cultivation will be conversion of crops by existing farmers to cannabis with very little legitimate environmental impact. I hope you have the resources to study and report on the actual environmental issues raised by an existing Carpinteria farmer converting from cut flowers to cannabis. That is the valid CEQA Baseline in the Carpinteria Valley.

94-5

I will wrap up and summarize here. My issue is the preservation of Commercial Agriculture in the Carpinteria Valley consistent with the County's Ag Preservation policies. For the rest of my life I will be dedicated to protect Carpinteria Ag lands from being converted to development, as the County has allowed to happen in the Goleta Valley during my lifetime. As stated above my 10 year old daughter is a 9th generation South Coast resident. I hope she chooses to stay here and live in Carpinteria where we are so happy and enjoy such a wonderful quality of life. It is my opinion based on my lifetime in local land use, that the most critical factor in that effort is to prevent in the Carpinteria Valley what happened in the Goleta Valley. When I was my daughter's age Goleta was covered with thriving Ag. As the financial viability of Ag waned and pressures to develop new housing mounted, the County allowed prime Ag lands to be converted to development and there we have it, Goleta 50 years later. For those who were not around look at an aerial shot of Goleta 50 years ago and Google Maps today. For those who do not believe the same could happen in Carpinteria, they are uninformed and/or naive. I can see it now, the struggling farmer willing to sell, the developer willing to promise to only build "Workforce Housing", and County staff saying we like Workforce Housing way more than we like greenhouse farmers, let's do it. And there goes the quality of life in the Carpinteria Valley forever. Just look at what is happening in the City of Santa Barbara with their AUD Program. Longtime City residents are in revolt. In 10 years every square inch of the City that is not a park is going to be covered with

development and most of the new residential is going to be high density with no parking. Throughout my life on the South Coast there have always been these euphemisms, today it is Workforce Housing. Those euphemism have all really meant the same thing, let's develop as much as we can possibly get away with. That is one of the reasons we moved to Carpinteria. I worked with and for successful local developers, it is my opinion that for a residential developer with the resources to have a longterm view, Carpinteria is a much better target than Goleta ever was. It is an idyllic residential setting, we have the World's Safest Beach, lots of Ag land that could be bought relatively inexpensively. It could happen and if we are not diligent, it will.

94-5
Cont. The issue that is apparent to me and apparently not to most of the anti-cannabis activists is that the historic market for cut flowers and other Carpinteria Valley greenhouse farmers' products has literally gone South and is not coming back. Our Carpinteria farmers are at risk and some see cannabis cultivation as the business of the future that can preserve their family farms and businesses. Not only is Ag a critical environmental issue in the Carpinteria Valley but it is an economic driver and major employer. It is my view that we should treat our remnant successful established South Coast farmers, in the same manner as an Endangered Species, which they are. In my humble opinion our local farmers are the most valuable "endangered species" we have in Santa Barbara County and they should be treated accordingly.

It is certainly not unusual to have area specific land use regulations. Who knows what the future will hold but I will start my advocacy with, for existing Carpinteria Valley greenhouses where the farmer wants to convert from an existing crop to cannabis or continue a currently lawful cannabis cultivation, no significant regulation is warranted or necessary. I know that politically you need to do something about odor but that must be a reasonable regulatory approach where the farmers will have very clear Notice of what they are expected to achieve to comply, and based on the best available scientific evidence in the record, and not on arbitrary, subjective personal opinions and anti-cannabis hysteria. All Ag comes with odors. I would much rather live next to a cannabis cultivation (which I do) than a pig farm, dairy or chicken farm. Even most crop cultivation comes with odors as demonstrated by the mistaken cannabis odor reports that the County has already documented in the Carpinteria Valley. When you are done listening to the anti-cannabis activists I hope you will consider the fact that California voters spoke overwhelmingly at the November election in the manner that is one of the more eloquent ways the People are empowered to speak, through the enactment of Legislation. I hope the County of Santa Barbara will respect that vote.

Please allow a step away from the anti-cannabis hysteria that has become a major theme in this discussion and focus on Ag preservation in the Carpinteria Valley. Listen to our longtime successful family farmers. Work reasonably with them and treat them as they should be treated, as some of the most important members of our community. Please promote the preservation of Ag in the Carpinteria Valley.

Russell R. Ruiz

Cruz, Patrick

From: Sandra S Mezzio [sandymv@me.com]
Sent: Tuesday, July 25, 2017 12:17 PM
To: Cannabis Info
Subject: Please help!

Greetings, Ms. Metzger.

I am writing to express my unhappiness with the unrelenting "skunk" odor in Carpinteria.

I live down in the beach area, (quite a distance from the growers,) and even here, I often wake up and retire to the stench of the malodorous weed.

The whole town smells like skunk much of the time.

Frankly, aside from being noxious, it is embarrassing.

A biochemist friend came to stay and remarked, "Your town has more dead skunks than I've ever smelled before!"

I would prefer NO cannabis cultivation, but if it must go forward, please assure that the growers are responsible for ZERO collateral stink.

Thank you for your time.

Regards,

Sandy Mezzio
4925-D Sandyland Rd.
Carpinteria CA 93013
805)452-8664



714 Bond Avenue
Santa Barbara, CA 93103

tel 805.563.3377
fax 805.687.5635

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Jessica Metzger, Senior Planner
Long Range Planning Division
123 E. Anapamu St.
Santa Barbara, CA 93101

Dear Ms. Metzger,

Thank you for the opportunity to comment on the Environmental Scoping Document for the County's Cannabis Land Use Ordinance and Licensing Program. Santa Barbara Channelkeeper, a grassroots nonprofit organization dedicated to protecting and restoring the Santa Barbara Channel and its watersheds, is concerned about the potential impacts to biological resources, hydrology and water resources from cannabis cultivation in the unincorporated areas of Santa Barbara County and offers the following comments and recommendations for issues to be addressed by the forthcoming Environmental Impact Report (EIR).

96-1

Similar to any irrigated agricultural operation, cannabis cultivation has the potential to result in detrimental impacts to fish and other sensitive species and habitats and can negatively affect in-stream water quality and hydrology through increased grading, vegetation clearing, erosion and sedimentation, stormwater runoff, and through contaminated tailwater discharges. We urge the county to fully assess and mitigate potential impacts to water quality resulting from these activities. While such activities (for outdoor cultivation) will likely fall under the regulatory oversight of the Central Coast Regional Water Quality Control Board's Conditional Waiver for Irrigated Agricultural Dischargers, the County should play a role in assessing whether any expansions of agricultural development (resulting from Cannabis cultivation) are suitable and appropriate for areas within the County's jurisdiction. Such assessment should consider the existence of 303(d) Listed water bodies impaired by nitrate, pesticides, sedimentation, and toxicity.

96-2

Cannabis cultivation can also potentially impact water quantity in streams and aquifers through increased pumping and water diversions. Santa Barbara County's coastal streams are particularly vulnerable to such impacts due to their reliance on surface-groundwater interactions (spring-fed streams) as well as seasonal low flow periods when stream habitats and wildlife are particularly vulnerable. We urge the County to assess and adequately mitigate potential impacts of water diversions from streams and interconnected aquifers on aquatic species and habitats. Cumulative water demand from any expanded or modified agricultural practices should be balanced with in-stream demands of fish and wildlife.

96-3

To the extent that cannabis cultivation may occur indoors within enclosed greenhouses or other facilities, Channelkeeper highlights additional methods, such as full capture and recycling systems and rooftop rainwater capture systems that could be required to mitigate potential environmental impacts. Such systems can dramatically reduce water demands and prevent runoff

96-3
Cont.

and tailwater discharges. We also note however that any brine and wastewater generated from such systems should be treated before being disposed of in ponds or landscapes for infiltration. The County should consider impacts to adjacent streams and underground water supplies, which could result from such disposal techniques.

Once again, we thank you for this opportunity offer comments on the Cannabis Land Use Ordinance and Licensing Program. We appreciate your consideration of these concerns.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Benjamin Pitterle', is written over a light blue rectangular background.

Benjamin Pitterle
Watershed and Marine Program Director
Santa Barbara Channelkeeper

Metzger, Jessica

From: Fogg, Mindy
Sent: Friday, August 11, 2017 10:53 AM
To: 'Sara Rotman'
Cc: Metzger, Jessica
Subject: RE: EIR Cannabis Cultivation/SB county

Hi Sara,

Thank you for submitting these inquiries. I'll include these in our public scoping comments/questions to be addressed in the EIR and discuss them with our team. I'll let you know what I find out.

Thanks again – it was great meeting you the other night!

Mindy Fogg

Supervising Planner I Long Range Planning Division
County of Santa Barbara I Planning & Development
123 East Anapamu St. I Santa Barbara I CA 93101
(805) 884-6848
mfogg@countyofsb.org
<http://www.sbcountyplanning.org>

From: Sara Rotman [<mailto:sara@tresososranch.com>]
Sent: Friday, August 11, 2017 10:36 AM
To: Fogg, Mindy
Subject: Fw: EIR Cannabis Cultivation/SB county

From: Sara Rotman
Sent: Friday, August 11, 2017 10:35 AM
To: mfogg@countryofsb.com
Cc: mollie culver
Subject: EIR Cannabis Cultivation/SB county

Hello Mindy,

I met you at the CBCSBC meeting in Golita earlier this week. Many thanks for your time and attention in sorting through the complicated issues surrounding the county guidelines.

The discussion was illuminating and I wanted to follow up with some requests/questions I'd like to see addressed in the EIR.

My questions are as follows:

97-1 I would like to see a comparative study of water use (per square foot/acre) relative to MJ as it compares the top 10 crops currently being cultivated in SB county? Strawberries, Wine Grapes, broccoli, Nursery Products, Cut Fower, Head Lettuce, Cauliflower, Avacado, Celery, Leaf Lettuce, Cattle.

97-2 Similarly - I would like to see a comparative data of toxic run off/waste produced by each of these crops (top 10 in SB county as well as projections for MJ cultivation in outdoor and mixed light scenario's).

I would like to know what proportion of the above mentioned agricultural products are known to be or intend to be operating within organic and sustainable state guidelines and practices.

What proportion of the the 11 crops mentioned will be distributed in SB county?

97-3 Will there be a comprehensive set of considerations or guidelines recommended for comparative impact of EACH of these crops in our agricultural community? Meaning, if, for example lettuce farming is found to be significantly more water intensive, or Avacados production regularly requires harmful pesticide spraying with the potential for contaminating neighboring water and air quality will there be a standard set of guidelines or tax and regulation off sets recommended to bring each of these important crops as close to environmentally neutral in their impact as possible?

Please let me know if there is someone else I should be forwarding this information to and so many thanks for your assistance in this matter.

All my best,

Sara

Metzger, Jessica

From: Ben Ellenberger [EllenbergerC@sbcapcd.org]
Sent: Thursday, August 10, 2017 4:54 PM
To: Metzger, Jessica
Cc: McNally, Kaitlin
Subject: 17ORD-00004 SBCAPCD Comments on NOP for Cannabis Land Use Ordinance and Licensing Program
Attachments: SBCAPCDNOPComments.pdf

Jessica,

Thanks for the opportunity to provide comments on this NOP. Our comments are attached. Please contact me if you have any questions.

Thanks,

Ben Ellenberger
SBCAPCD
(805) 961-8879



**Santa Barbara County
Air Pollution Control District**

Our Vision  Clean Air

April 10, 2017

Jessica Metzger
Santa Barbara County
Long Range Planning
123 E. Anapamu Street
Santa Barbara, CA 93101

Re: APCD Response to the Notice of Preparation of an Environmental Impact Report for the Cannabis Land Use Ordinance and Licensing Program, 17ORD-00000-00004

Dear Ms. Metzger:

The Santa Barbara County Air Pollution Control District (APCD) appreciates the opportunity to provide comments on the Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) for the Cannabis Land Use Ordinance and Licensing Program. APCD's mission is to protect the people and the environment of Santa Barbara County from the effects of air pollution. As the County of Santa Barbara develops guidelines regulating cannabis activities, we believe it is important to address potential air quality impacts.

98-1

Cannabis activities have the potential to generate nuisance odors. The EIR should address potential odors and identify measures to mitigate nuisance odor impacts. Cultivation could take many forms, for example: open fields, hoop houses, greenhouses, or indoors. The EIR should analyze potential impacts from each type of cultivation expected in the county. The analysis of each proposed mitigation measure should also provide evidence whether that measure is effective for each type of cultivation. Mitigation might take the form of establishing minimum distances from sensitive receptors, development and implementation of an odor control plan, use of odor control devices, operating practices, or some combination of these or other methods.

98-2

Processing cannabis products after harvest may include activities that are subject to permit. The EIR should address the requirement of processing activities to comply with air district regulations. These may include VOC limits on solvents used in extraction, storage and disposal requirements for VOC-containing compounds, and the requirement to obtain a permit.

98-3

Cannabis cultivation operations may use diesel-fired equipment for irrigation and/or lighting. Diesel-fired equipment is a source of toxic air emissions, criteria pollutants, and greenhouse gases. The EIR should address health risk, local air quality impacts, and greenhouse gas emissions from the use of diesel-fired equipment. It should discuss requirements for registration or permitting, and emission standards to which the equipment would be subject. Potential mitigation might include minimizing power use on-site, using grid power or on-site renewable power to the greatest extent possible, and, if diesel engines are used, using Tier 4 certified engines to the greatest extent possible.

98-4

Disposal of crop residue by burning can result in significant air quality impacts. The EIR should address how to minimize or eliminate impacts associated with burning crop residue.

Aeron Arlin Genet • Air Pollution Control Officer
260 North San Antonio Road, Suite A • Santa Barbara, CA • 93110 • 805.961.8800
OurAir.org • twitter.com/OurAirSBC

Thank you for the opportunity to comment on the scope of the EIR. Please contact me at (805) 961-8879 or by email at cbe@sbcapcd.org if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Ben Ellenberger", with a long horizontal stroke extending to the right.

Ben Ellenberger
Manager
Technology and Environmental Assessment Division

cc: Kaitlin McNally, Manager, Compliance Division
TEA Chron File

FOR THE ENVIRONMENTAL Scoping Document
Preview and public Response related to
the Cannabis Land Use Ordinance and
Licensing Program.

contact: JESSICA METZGER, Project Planner
123 E. ANAPAMU ST.
Santa Barbara, CA. 93101

left at the above office Thurs. Aug. 10,
2017 in person. I have NO E-MAIL.

Sheryl L. Robinson resident of Santa
Barbara, CA. Registered voter. 1325
Chapala St. Apt. 6 Santa Barbara, CA
93101. 805. 324. 4623. NO E-MAIL

Regards Proposition 64 passed in California
Nov. 8, 2016. I voted against the proposition.

In short, I advise all non-medical cannabis
be sold in state licensed stores. The location
of these stores ~~be~~ situated in business-
zoned Areas. The sales personnel be vetted for
business knowledge of cannabis to answer
questions - have a license to sell the product
and NO felony background. The cultivation
~~be~~ ^{be} under state. Licensed operations and not
to have a negative impact on land use near
by. The sale, growing of cannabis, etc not
to be under private commercial investment.

Signed. Sheryl Robinson

Metzger, Jessica

From: Susan Murphy [sgmurph2@gmail.com]
Sent: Friday, August 11, 2017 3:08 PM
To: Metzger, Jessica
Cc: Wolf, Janet
Subject: Cannabis Land Use Ordinance and Licensing Program

Date: August 11, 2017

Jessica Metzger, Project Manager

Planning & Development

Long Range Planning Division

123 Anapamu Street

Santa Barbara, CA 93101

Re: Cannabis Land Use Ordinance and Licensing Program

Draft Environmental Impact Report (EIR)

Dear Ms. Metzger;

I, and a number of other residents of my community in the unincorporated area between Santa Barbara and Goleta, were shocked and appalled to learn only a couple of weeks ago of plans by the County of Santa Barbara to amend existing County land codes and ordinances to allow certain activities relating to the growth, production, and sale of cannabis and cannabis products in the unincorporated areas of our County.

100-1 In my view, the proposed Cannabis Land Use Ordinance and Licensing Program is an ill-thought out effort on the part of certain county officials, with the full support of the very powerful cannabis lobby and certain would be get-rich-quick property owners, to ram this program through the bureaucratic process before the public is even aware of what is going on and the County has had time to thoroughly study and evaluate the possible effects it might have on the County as a whole, and its unincorporated areas in particular. This effort is being spearheaded by a recently formed subcommittee of the County Board of Supervisors, headed by two of its members who are most eager to support this effort, without the participation of the other Supervisors.

Proponents of this Program argue that tax revenues generated by this currently exceedingly profitable business would alleviate considerably, if not eliminate, the County's financial woes. However, recent reports indicate that the State of California's marijuana producers are already producing between eight and ten times the amount needed for consumption, and that this glut will likely continue when new regulations that ban exports go into effect on January 1, 2018. While the current cannabis industry in Santa Barbara County is still enormously profitable, this will most likely change when new licenses are issued and the number of growers increases. Moreover, the cannabis industry is currently a cash industry, as cannabis activities are currently illegal in the eyes of the Federal Government. Since this makes it virtually impossible to track financial transactions in this industry, the much-hyped potential flow of tax dollars pouring into the county coffers may be considerably less than anticipated.

100-1
Cont. Proponents of this Program also argue that the County needs to establish its own regulations governing the cultivation, production, and use of cannabis and cannabis products before the State begins issuing licenses on January 1, 2018. As Paragraph 3.3 of the Environmental Scoping Document for the Cannabis Land Use Ordinance and Licensing Program points out, however, "*None of the above regulations limit the authority of a local governing body to adopt and enforce local ordinances regulating or completely prohibiting state-licenses cannabis operations. Moreover, local jurisdictions may regulate or ban all outdoor cultivation and may impose reasonable regulations on personal cultivation (Health and Safety Code section 11362.2(3)(b)).*" (Emphasis mine)

In my view, there is insufficient time between now and January 1, 2018, when the State of California is supposed to start issuing licenses for entities to engage in medical and nonmedical cannabis activity, for the County to establish well thought out local regulations governing the growth, production, and use of cannabis and cannabis products, taking into consideration the full and largely irreversible environmental and other impacts they would have on our county and its residents. Moreover, the question of who is going to enforce the regulations that are approved, and where the money needed to do so is going to come from, needs to be addressed. In light of these and the other aforementioned considerations, I believe the current ad hoc subcommittee should be disbanded and the issue returned to the full Board of Supervisors to handle in more open and transparent manner, and that the push to rush this Project through by the 1st of January, 2018, be stopped. In the meantime, the Board should simply prohibit state-licensed cannabis operations in our county except, perhaps, for medical purposes, until we have sufficient time to assess the long-term environmental and other impact of such operations on our county and decide whether we even want to permit them at all.

With regard to any regulations that may be formulated or Environmental Impact Report that may be drafted in the future concerning the growth, production, and/or use of cannabis or cannabis products, I would like to recommend the following:

- 100-2
- No activities relating to the growth, processing, production, distribution, or sale of cannabis or cannabis products should be permitted near residential areas, especially in the densely populated area along Hollister Avenue between Santa Barbara and Goleta.

100-3

- The “buffer” between any of these activities and “sensitive receptors” should be increased from 600 feet to at least 1,000 feet and preferably higher.

100-4

- No activities relating to the processing, production, distribution or sale of cannabis or cannabis products should be allowed in small shopping centers that serve nearby residential areas; they should be allowed, if at all, only in industrial areas or larger centers, such as Camino Real.

100-5

- In deciding which, if any, areas of the County would be appropriate for the conduct of any cannabis-related activities, primary consideration should be given to the impact they would have on nearby residents, local resources, especially water, and the environment—not the enrichment of local landowners or potential tax dollars resulting from same.

100-6

- County planners and other officials should consider the demonstrated effects of cannabis growing and related activities on residents in Colorado, as well as in nearby Carpinteria, before rushing to allow them in the Eastern Goleta Valley. They should also remember the abortive attempt to allow medical marijuana dispensaries to operate in City of Santa Barbara.

100-7

- In contemplating any zoning or ordinance changes, primary consideration should be given to preserving the County’s environment, its resources, including its valuable farmland, and the health and well being of its residents, not to self-serving interests of certain politicians and the cannabis industry.

Thank you for considering my views on this important issue.

Sincerely,

Susan Murphy

Resident of “Noleta”

Cruz, Patrick

From: Charmaine Rogers [tbrogers@pacbell.net]
Sent: Tuesday, August 08, 2017 9:21 AM
To: Metzger, Jessica; Cannabis Info
Subject: Comments on Proposed Cannabis Ordinance

Dear Ms. Metzger:

This letter is to express our concerns regarding the County Board of Supervisors ad hoc committee establishing a proposed ordinance regarding growing, manufacturing, testing and distribution of cannabis in Eastern Goleta Valley and possibly Montecito. We are residents of Montecito.

The residential areas in Eastern Goleta Valley are surrounded by Ag1 parcels such as Lane Farms and San Marcos Farms, which have a tradition of growing food sold at their sites and at farmers' markets. These areas are also close to San Marcos High School, as well as elementary schools.

101-1 Due to the odor emitted by growing cannabis, the health and quality of life for surrounding property owners and residents will be affected. There is also the uncertain future of property values for the current homeowners.

101-1 The fact that the proposed ordinance talks about the odor problem in section D.3. testifies to the fact that there is a problem, and does not take severe enough measures to deal with it when a complaint is received. The only way to eliminate the odor problem is to not have it in the first place.

101-2 Does the County of Santa Barbara which has a history of being able to grow avocados, citrus, strawberries, and other necessary food want to use land and water resources to grow cannabis? According to an MSN/Money report on July 30, 2017, "California marijuana producers are growing eight times the amount needed for consumption," citing Patrick McGreevy of the Los Angeles Times. Cannabis is not a necessity for life. Food is. If the County is bound and determined to cash in on this new California "gold rush," the cultivating and manufacture of cannabis should be confined to rural areas where water resources are not needed for residents or farming, and where this odoriferous crop will not affect homeowners. Certainly allowing it to be no less than 600 feet away from homes or schools is not far away enough to eliminate all the potential problems.

101-3 Rather than be established by committee, any ordinance meant to deal with the growing, cultivating, manufacture, testing and distribution of cannabis is such an important issue that it should be considered by all five members of Santa Barbara County Board of Supervisors, together with the Long Range Planning Division, and it should be accompanied by an open and transparent process in the public forum.

Sincerely,

Thomas and Charmaine Rogers

Metzger, Jessica

From: Tim [Tim@sm4.org]
Sent: Friday, August 11, 2017 4:08 PM
To: Metzger, Jessica
Subject: Comments Re: County Marijuana Ordinances

Greetings, Jessica...

I'm writing to offer my comments regarding two concerns I have related to marijuana growing facilities. These concerns grow out of what has been experienced in Denver in recent years and are specifically related to zoning and establishing preventative measures to protect our county and its citizens.

First, because marijuana crops are known to be highly lucrative, increased theft against growing facilities should be anticipated (including theft by heavily armed individuals which places nearby residence in harms way). My suggestions are:

- 102-1
- Require added security measures for all growing facilities to discourage break-ins. These measures could include the requirement of K-rated security fencing (already required for chemical plants, etc.), security rated doors and windows, monitored alarm systems, and video surveillance.
 - Require added permitting fees that would help fund policing programs related to marijuana growing.
 - Strong zoning ordinances for growing facilities, ensuring such facilities not be in proximity of housing, schools, churches, or public parks.

Second, because marijuana grows are known to create serious odor nuisances, my suggestions are:

- 102-2
- Establish heightened odor ordinances, along with serious penalties for infractions, including shutting down facilities that are out of compliance.
 - Require significant industrial filtration to mitigate odor seeping out of growing facilities.
 - Strong zoning ordinances for growing facilities, ensuring such facilities not be in proximity of housing, schools, churches, or public parks.

Many thanks...

Tim Mossholder
Lead Pastor
Santa Maria Foursquare Church
805.922.8445 - church
503.816.4411 - cell
SM4.org

Cruz, Patrick

From: Todd Booth [toddboothsb@gmail.com]
Sent: Monday, July 31, 2017 8:21 PM
To: Cannabis Info
Subject: Concerns of Hollister Cannabis Growers

Hi Jessica Metzger,

We have a real concerns over the growing of cannabis in our own neighborhood. We have lived on Santa Paula Ave for the past 20 yrs and do not want]to see our neighborhood deteriorate with this large cannabis project scheduled for the near future.

103-1 My main concern is the awful skunk odor the plants give off during the growth process. I have friends that live in Carpinteria who have experienced quality of life issues due to the smell which I understand in reading about neighborhoods in Colorado with similar growers that the smell travels a long distance. Children that have breathing problems can't play in the neighborhood, I find it hard to believe that this area would be an option so close to an elementary school, Girls Inc and a high school. Shopping Center where people eat and buy food. Not to mention our property values will also be affected there are a lot of residents in this area that it will affect.

Please look for rural areas to at least grow the plants and please do not allow the growing in our residential areas with children. You will change the charector of our nice family neighborhoods.

This is a ridiculous idea to have this proposed in a neighborhood.

--

Todd and Rosa

Tom and Denise Peterson
2725 Avena Road
Lompoc, CA 93436

RECEIVED
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S B COUNTY
PLANNING & DEVELOPMENT

August 6, 2017

We have lived at our present residence for over 13 years. We moved here for the rural, open space and ranch atmosphere. We greatly opposed the legalization of Marijuana knowing that people would acquire property for the soul purpose to grow marijuana with no concern for the neighborhood or the impact it would have on the environment and traffic.

We recently had to go through the CUP processes. County road usage, water and endangered Salamanders were the big issues. Our area falls under Rural Residential/Residential Ranchette.

These are our concerns:

- 104-1 | 1. Hoop houses popping up all around us, they apply for permits to grow tomatoes and flowers and are growing marijuana. Under section 35.42.140 they are to obtain permits.
- 104-2 | 2. No one is actually inspecting what they are truly growing.
- 104-3 | 3. Most are not "Owner Occupied" operations, they do not live here, thus do not care what happens to the land – contamination and waste.
- 104-4 | 4. Highly concentrated fertilizers, contaminating our aquafer, we are all on wells.
- 104-5 | 5. Run off and erosion from these Non Permeable building structures they are erecting.
- 104-6 | 6. Water usage in our canyon is another issue.
- 104-7 | 7. Generators running 24/7 – carbon dioxide?
- 104-8 | 8. Set up of illegal trailers for security, no septic tanks or permits for these trailers.
- 104-9 | 9. Traffic has increased considerably, using county roads. Since the workers are all paid in cash, how do you regulate the amount of people coming and going using the roads?
- 104-10 | 10. Cutting down mature oak trees to clear land for hoop houses.
- 104-11 | 11. What about the "Endangered Animals" in our area? I have seen ranches and farmers shut down because of salamanders in SB County.

Thank you for your consideration, our neighborhood is under siege.


Tom and Denise Peterson



Dear Jessica,

Please don't let Carpinteria go from "The World's Safest Beach," to "Pot Town," or "Stinky Town." As a long time resident and home owner I feel forced into selling my house now because property values will plummet soon. It should be illegal to ruin property values and investments for homeowners. Big business is taking over. What's next meth labs to generate \$\$\$\$?

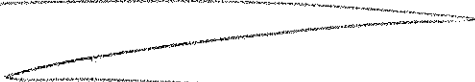
Marijuana is not a harmless drug. When smoked it burns out your lung lining at an alarming rate, far worse than cigarettes. Ask any radiologist, they can tell right away an xray of a pot smoker versus a cigarette smoker. Medicinal edibles are very dangerous. They require a hands on administration to the patient due to hallucination etc. Pot is also very dangerous around pets if they ingest it!

The crime that goes along with being a "Pot" town will be huge and we do not have the

funding is up the sheriffs in Carpinteria.
They are already short staffed and the drug
related crime is up now in Carpinteria;
I have already witnessed a guard dog at
a newly purchased former greenhouse turned
pot grower, escape the fenced facility and
kill a neighbors cow! It will have a huge
ripple effect and ruin our loved small town.
The greenhouse owners have biding wars to
purchase their greenhouses as we speak from
outside multiple investors!

105-3
Cont.

Please Help Stop this!



Cruz, Patrick

From: Valerie Bentz [valeriebentz@gmail.com]
Sent: Wednesday, July 26, 2017 4:40 PM
To: Cannabis Info
Cc: Williams, Das; board
Subject: Odor and Allergic Issues in Carpinteria--"Skunksville?"

Dear Santa Barbara County Board,

I am writing to request that Santa Barbara County significantly restrict or eliminate marijuana plant growing in and around Carpinteria, CA.

For the last six months or more I have noticed a skunk-like odor coming into my windows and around the area which comes from marijuana growing plants. The odor is not only objectionable but I also have an allergic reaction to it. The odor becomes intense nightly around 9 PM and continues through much of the night.

I have had to purchase an air purifier in my bedroom and home office in order to be comfortable.

106-1 I believe there a problem with allergic reactions, not just with the objectionable odor. (My dog also started coughing since this has intensified, sometimes for much of the night.)

There is a reputational factor to consider. Carpinteria is known as a small peaceful town where there are lots of flower greenhouses, nurseries, and avocado ranches. This has had an uplifting effect on tourists and residents.

Now, when I am driving from Santa Barbara to Carpinteria in the evening a distinct skunk odor begins at about Padaro Lane. It is strong and noticeable. This is obviously the effect of the marijuana growing.

While picking up an out of town guest from the Santa Barbara airport one evening, he said "Where do you live, in "Skunksville?" The odor certainly lowers the impression of our community.

106-2 In addition, pervasive marijuana growing could significantly change the sense of our community to a pot-ridden place which may attract undesirable elements. This could significantly lower our property values.

(Don't get me wrong, I am not in favor of marijuana use being illegal. I just think it needs to be highly regulated as is alcohol production and consumption.)

Think about it. What if the famous Carpinteria Avocado Festival turned into the Carpinteria Marijuana Festival with a slogan, "Peace, Love and Pot" replacing the usual, "Peace Love and Avocados"?

it gives you a different sense of the kind of family community we are, doesn't it?

Also, think of the "Rods and Roses" Event, becoming "Rods and Pot". We would not be attracting the kind of visitors who would make for a lovely family afternoon on Linden Drive!

Please, for the sake of the health and well being of Carpinterians, please significantly restrict or eliminate pot growing in our community.

Sincerely,
Valerie Bentz, Ph.D.
Homeowner at
5367 Ogan Rd.,
Carpinteria, CA 93013

Cruz, Patrick

From: Vicky Lorelli [vllorelli@gmail.com]
Sent: Monday, July 31, 2017 11:23 AM
To: Cannabis Info
Subject: Rezoning for Pot

107-1 Rezoning for growing pot in areas near schools and neighborhoods is a bad idea. It affects the air quality for otherwise healthy citizens and especially for children, older adults, and others with upper respiratory health problems. It appears that the rezoning is being pushed because the pot industry can be financially lucrative for Santa Barbara and Goleta which is true but it places financial greed above quality of life.

107-2 I do not live the the first potentially affected area. I also did not vote to legalize recreational marijuana, only because we had not studied the unintended consequences extensively enough. This rezoning issue is only the first of many to cause possibly serious problems. I will watch to see who votes to pass the rezoning initiative and then cast my vote accordingly when elections come around.

Vicky Lorelli
248 Calle Amarilla
Santa Barbara, CA 93110

Cruz, Patrick

From: Bill Potts [mr.zip1950@yahoo.com]
Sent: Saturday, July 29, 2017 3:42 PM
To: Cannabis Info
Subject: Tepusquet Canyon Marijuana growing farms

108-1 After reading the article in Friday's 7/28 edition of the Santa Maria Times, I feel compelled to express my opinion. If you are truly looking out for the environment, and not just the opportunity at extra money for the county, I would say to be honest and say it's for that reason only. I realize the county is in financial straits, but please don't ignore the areas water resources, lack of manpower to enforce your regulations, and resident's concerns. Just because it's the law, doesn't mean you have the right to force your citizen tax base to subsidize that industry. Please think this through, and find another way to locate the industry somewhere else, and quit trying to regulate other industries out of existence such as agriculture, tourism, or oil. Manage the county budget better, instead of looking for a quick fix!

Sincerely, William T. Potts
931 N.Ridge View Dr. Santa Maria, CA. 93455

