



BOARD OF SUPERVISORS  
AGENDA LETTER

**Agenda Number:**

**Clerk of the Board of Supervisors**  
105 E. Anapamu Street, Suite 407  
Santa Barbara, CA 93101  
(805) 568-2240

**Department Name:** Planning and Development  
**Department No.:** 053  
**For Agenda Of:** August 31, 2021  
**Placement:** Departmental  
**Estimated Time:** 2 hrs. on September 21, 2021  
**Continued Item:** No  
**If Yes, date from:** N/A  
**Vote Required:** Majority

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**TO:** Board of Supervisors  
**FROM:** Department Lisa Plowman, Director, Planning and Development  
Director: (805) 568-2086  
Contact Info: Travis Seawards, Deputy Director, Development Review Division  
(805) 568-2518  
**SUBJECT: JCCrandall, LLC Appeal of the Planning Commission Approval of the Santa Rita Holdings, Inc., Cannabis Cultivation Project, Case No. 21APL-000000-00031, Fourth Supervisorial District**

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**County Counsel Concurrence**

As to form: Yes

**Auditor-Controller Concurrence**

As to form: N/A

**Other Concurrence:** N/A

**Recommended Actions:**

Staff recommends that your Board take the following actions to deny the appeal and uphold the County Planning Commission's approval of the Project:

- a) Deny the appeal, Case No. 21APL-00000-00031;
- b) Make the required findings for approval of the Project, Case No. 19CUP-00000-00018, as specified in Attachment 1, including CEQA findings;
- c) Determine that the previously certified Program EIR (17EIR-00000-00003) constitutes adequate environmental review and no subsequent Environmental Impact Report or Negative Declaration is required pursuant to CEQA Guidelines Sections 15162 and 15168 (c)(2) (Attachments 3 and 4); and

- d) Grant *de novo* approval of the Project, Case No. 19CUP-00000-00018 subject to the conditions of approval (Attachment 2).

### **Summary Text:**

On April 17, 2019, the Applicant, Santa Rita Holdings, Inc., submitted an application for a Conditional Use Permit for a cannabis operation consisting of 2.54 acres of cultivation of immature and mature plants. Cannabis is currently being cultivated and processed onsite based on an affidavit of legal nonconforming use. A detailed Project Description is provided below.

On June 9, 2021, the County Planning Commission (Commission) granted approval of the Proposed Project. On June 18, 2021, JCCrandall, LLC, filed a timely appeal of the Commission's approval of the Proposed Project. During the June 9, 2021 County Planning Commission hearing, the Commission requested that the Wildlife Movement Plan for the Proposed Project be updated to require the owner/applicant to comply with any subsequent modifications or revisions as required by the California Department of Fish and Wildlife (CDFW) and/or United States Fish and Wildlife Service (USFWS). The Wildlife Movement Plan (Attachment 10) has been updated accordingly.

### **A. Proposed Project**

Since the Commission's approval, the Project Description was revised to further clarify aspects of the Proposed Project, including that the nursery cultivation will take place under 4-ft.-tall hoop structures. The revised Project Description also clarifies the duration that refrigerated trucks will remain onsite at any given time, which is a maximum of three days, and that supply deliveries will take place on average once per day. The revised Project Description refines the description of the proposed fencing, water use, and water tanks. The modified Project Description is provided below (deleted text shown in strikethrough font and new text shown in underlined font).

The Proposed Project is a request for approval of a Conditional Use Permit to allow for a total of 2.54 acres of outdoor cannabis cultivation, including 1.88 acres under 14-ft.-tall hoop structures, 0.55 acres of mature cultivation without hoop structures, and 0.11 acres of nursery cultivation ~~without hoop structures~~. Mature cultivation will take place in raised beds, in the ground, or in 30-gallon pots, and nursery cultivation will be in 4-inch to 1-gallon pots located underneath ~~plastic coverings~~ small hoop structures that will be ~~less than 3~~ up to 4-ft.-tall. Hoop structures will be located at least 100 ft. from the top-of-bank of a drainage traversing the site. The cultivation area without hoop structures nearest to this drainage will be setback at least 50 ft. from the top-of-bank. Hoop structure coverings will be removed as needed between November and February. Irrigation will be on a timed-drip system and will utilize soil monitoring and evaporative barriers. The Wildlife Movement Plan will be updated to require the owner/applicant to comply with any subsequent modifications or revisions as required by CDFW and/or USFWS.

Hours of operation will be from 6:00 a.m. to 4:00 p.m. seven days per week. Plants will be chopped in the field, binned, and then weighed and tagged outside of an existing 120 sq. ft. shed and underneath an existing 575 sq. ft. tractor shade structure that is open on all sides. Cannabis product will then be loaded onto refrigerated trucks and will be transported offsite. During harvests, the refrigerated trucks will ~~remain onsite~~ be on the property over the course of ~~for~~ up to three days as trucks are filled with cannabis and then transported offsite. Trucks that contain cannabis will not be stored onsite overnight. The 120 sq. ft. shed will be used for storage of pest management equipment, nutrients, as well as administrative records and materials and will not require any utility hook-ups. Harvested cannabis will be trucked offsite for

processing daily during harvests, and no drying, trimming, curing, or processing will occur onsite. Plant waste will be stored in bins that will be hauled and composted offsite. Roundtrip ~~V~~vehicle trips generated by incoming and outgoing delivery of supplies or product will occur on average ~~twice~~ once daily.

The operation will require up to three regular employees, who will live in the onsite legal nonconforming 1,096 sq. ft. single-family dwelling. Aside from housing, the dwelling will not be used for any activities, including administration, related to the cannabis operation. The operation will require up to 12 temporary employees during planting and harvesting for a maximum total of 15 employees. Temporary employees will be transported to the site by a labor contractor in carpools or shuttles. There will be up to three harvests per year which will last up to three days each time. There will be three parking spaces onsite for the cannabis operation and two parking spaces onsite for the single-family dwelling.

All exterior light fixtures will be fully shielded, directed down, on a motion sensor, and mounted at a maximum height of 8 feet. The lights will remain illuminated for five minutes after activation. The site is not visible from any public viewing areas or public roads. The Proposed Project includes 2,780 sq. ft. of aromatic landscaping planted along the west property boundary. An 8-ft.-tall deer fence is located around the cultivation areas and will ~~be extended in order to~~ exclude the legal nonconforming 1,096 sq. ft. single family dwelling and legal nonconforming 216 sq. ft. storage shed, which will not be used as part of the Proposed Project, from the cultivation areas.

The existing ~~f~~Five 5,000-gallon water tanks, two 2,500-gallon water tanks, and one 1,500-gallon water tank will continue remain to be located onsite. Domestic and agricultural water will continue to be provided by Vista Hills Mutual Water Company. Wastewater treatment for regular employees will be provided by an existing onsite septic system and restrooms in the single family dwelling. All sanitation facilities will be provided in compliance with OSHA. Power will be provided by PG&E and a portable generator in the case of an emergency.

There is no grading proposed. The County Sheriff will provide Law enforcement, and County Fire will provide fire protection. The property will be accessed off Santa Rita Road via an existing unpaved 12-ft.-wide private driveway. The property is a 120-acre parcel zoned AG-II-100 and shown as Assessor Parcel No. 099-110-060 located at 2300 Santa Rita Road in the Lompoc area, Fourth Supervisorial District.

**B. Background:**

On April 17, 2019, the Applicant submitted an application for a Conditional Use Permit (CUP), Case No. 19CUP-00000-00018, to allow 2.54 of outdoor cannabis cultivation. The Project area is located in the southwest corner of the 120-acre subject property which is zoned AG-II. Cannabis is currently grown onsite outdoors under hoop structures as well as in the open sun.

Staff reviewed the CUP application for compliance with the applicable policies of the County Comprehensive Plan and development standards set forth in Section 35.42.075 (Cannabis Regulations) of the County Land Use and Development Code (LUDC) On June 9, 2021, the Commission granted approval of the Proposed Project.

On June 18, 2021, the JCCrandall, LLC, filed a timely appeal of the Commission's approval of the Proposed Project. The Board of Supervisor's (Board) Appeal Application is included as Attachment 4. The Appellant's appeal issues and staff's responses are discussed in further detail under Section C of this Board Agenda Letter.

### **C. Appeal Issues and Staff Responses**

The Appeal application (Attachment 4) contains a letter outlining the issues on appeal. The appeal letter alleges that the Proposed Project is inconsistent with the Land Use and Development Code (LUDC) and with State law, that approval of the Proposed Project is not supported by evidence in the record, that the PEIR and CEQA Checklist prepared for the Proposed Project are deficient, and that the Commission approved the Proposed Project under a truncated and rushed hearing. Staff reviewed the appeal issues and found they are without merit. The appeal issues and staff's responses are discussed in detail below.

#### **Appeal Issue No. 1: Inconsistent With the Land Use and Development Code**

The Appellant states that the Proposed Project is not consistent with the LUDC.

#### **Staff Response:**

The Proposed Project is consistent with all applicable sections of the LUDC, including the following sections:

35.21.020 *Purposes of the Agricultural Zones*,  
35.21.050.A *Agricultural Zones Development Standards; General Development Standards*,  
35.42.075 *Cannabis Regulations*, and  
35.42.140.C *Hoop Structures and Shade Structures Development Standards*

Section 35.21.020 *Purposes of the Agricultural Zones* states that the AG-II zone is applied to areas appropriate for agricultural land uses on prime and non-prime agricultural lands located within the Rural Area as shown on the Comprehensive Plan maps. It further provides that the intent of the AG-II zone district is to preserve these lands for long-term agricultural use. The Proposed Project meets the intent of the AG-II Zone and the zone requirements for setbacks, height, and allowed uses. The Project site is located on an Agriculture II (AG-II-100) zoned property in an area designated as Rural in the Comprehensive Plan, and it is surrounded by agricultural uses. The Project area has historically been used for grazing. The parcels surrounding and in the vicinity of the subject property that are zoned AG-II have been historically used for agricultural activities such as grazing and growing irrigated crops. The cannabis operation will continue to preserve the 2.54 acres for agricultural activity through the cultivation of crops.

The Proposed Project is consistent with the requirements for cannabis cultivation as outlined in LUDC Section 35.42.075, which provides standards that are designed to protect the public health, safety, and welfare, enact strong and effective regulatory and enforcement controls as a result of and in compliance with State law, protect neighborhood character, and minimize the potential for negative impacts on people, communities, and the environment by establishing minimum land use requirements for medicinal and adult use cannabis activities including cultivation, processing, distribution, manufacturing, testing, and sales.

The Proposed Project is required to demonstrate consistency with requirements for landscaping and screening, security and fencing, lighting, water efficiency, transportation demand management, odor abatement, and biological resources. The Proposed Project is not visible from public roads, and includes 8-ft.-tall fencing (Attachment 6). Exterior light fixtures will be on motion sensors (Attachment 6). As demonstrated by the Site Transportation Demand Management Plan (STDMP) (Attachment 6), there will be up to three regular employees who will live in the onsite single-family dwelling and up to 12 temporary employees during harvests. The Odor Abatement Plan (OAP) (Attachment 7) is certified by Nate Seward,

a Certified Industrial Hygienist, of Premier Environmental Consulting, and meets the requirements for odor control as outlined in LUDC Section 35.42.075.C.6. The nearest residential zone is 2.8 miles to the west, and the nearest residential zone east of the subject property is over nine miles away in the City of Buellton. The Proposed Project includes a Tree Protection Plan, Habitat Protection Plan, and Wildlife Movement Plan, all of which were reviewed by CDFW and USFWS consistent with LUDC Section 35.42.075.C.8.

The Proposed Project is consistent with the Hoop Structures and Shade Structures Ordinance Regulations as outlined in LUDC Section 35.42.140.C. No lighting will be associated with the 1.88 acres of 14-ft.-tall hoop structures or small nursery hoop structures with a height up to 4-ft.-tall. The hoop structures will not have any permanent elements or utilities. The hoop structures will be located outside of all required setbacks, including the required 100-ft. setback from the top-of-bank of the unnamed ephemeral drainage. The Planning Commission staff report, dated June 1, 2021 and included as Attachment 8, includes a detailed analysis detailing how the Proposed Project is consistent with each applicable development standard in the LUDC.

**Appeal Issue No. 2: Inconsistent With State Law**

The Appellant states that the Proposed Project is not consistent with State law. Specifically, the Appellant asserts that the Proposed Project is in violation of Cal. Bus. & Prof. Code Section 26051.5(a)(2), which states that an applicant for a State cannabis license shall provide evidence of the legal right to occupy and use the proposed location, and the Appellant contends that the access easement granting access rights over the private portion of Santa Rita Road crossing over the Appellant’s property does not expressly authorize or consent to the transportation of cannabis.

**Staff Response:**

The Proposed Project shall comply with all applicable State laws, as required by 35.42.075.A.2.a of the LUDC. In order to conduct commercial cannabis business in the County of Santa Barbara, business entities must obtain the appropriate State license from one of the State’s three licensing authorities: Bureau of Cannabis Control, Cal Cannabis, and the Manufactured Cannabis Safety Branch. An applicant for a State cannabis license must show proof that the Property Owner has “acknowledged and consented to permit commercial cannabis activities to be conducted on the property by the tenant applicant.” (Cal. Bus. & Prof. Code Section 26051.5(a)(2).) The Proposed Project is required to obtain all applicable State licenses prior to issuance of a County Business License in compliance with Chapter 50 of the County Code.

Under Section 35.80.030.B of the LUDC, an application for a zoning permit may be filed by either the “owner of the subject property” or with the written consent of that property owner. Kim Hughes of the Hughes Land Holding Trust, Property Owner of the subject property at 2300 Santa Rita Road, acknowledged and consented to permit the Proposed Project on the property.

The Applicant/Owner must demonstrate access in order to be compliant with Comprehensive Plan Land Use Development Policy 4, which states that adequate services, including access are available to serve the proposed development. There is no requirement in the LUDC that the owner of an access easement obtain consent from the underlying fee owner of the property in order to utilize the easement to access the subject property.

The access easement for the Proposed Project, included as Attachment 11, was granted for “ingress and egress” and it notes that at the time of the easement’s creation, the subject parcel was used for “agricultural

activities, livestock grazing, and one single-family residence.” The Project proposes to utilize this private easement for ingress and egress to access the project site in connection with agricultural activities, and therefore the Applicant has shown adequate access for the Proposed Project. Any further disagreement regarding the scope of the easement or its burdening of the underlying property is a private, civil matter that is outside the scope of the County’s zoning permit review process.

**Appeal Issue No. 3: Approval Is Not Supported by Evidence in the Record**

The Appellant asserts that the Commission’s approval is not supported by evidence in the record. The Appellant also states that the review authority cannot make the findings required for approval of a Conditional Use Permit set forth in Section 35.82.060.E.1 of the LUDC related to the adequacy of the site to accommodate the Proposed Project. The Appellant contends that the Proposed Project has no legal access.

**Staff Response:**

Approval of the Proposed Project is supported by evidence in the record, and all findings required for approval of a Conditional Use Permit can be made. The Proposed Project is consistent with each of the seven required findings from LUDC Section 35.82.E.1, as described below.

- a. The site for the Proposed Project is adequate in terms of location, physical characteristics, shape, and size to accommodate the type of use and level of development proposed.
- b. Significant environmental impacts will be mitigated to the maximum extent feasible.
- c. Streets and highways are adequate and properly designed to carry the type and quantity of traffic generated by the proposed use.
- d. There will be adequate public services, including fire protection, police protection, sewage disposal, and water supply to serve the proposed project.
- e. The proposed project will not be detrimental to the comfort, convenience, general welfare, health, and safety of the neighborhood and will be compatible with the surrounding area.
- f. The proposed project will comply with all applicable requirements of this Development Code and the Comprehensive Plan, including any applicable community or area plan.
- g. Within Rural areas as designated on the Comprehensive Plan maps, the proposed use will be compatible with and subordinate to the rural and scenic character of the area.

The Proposed Project is consistent with each of the findings set forth in Section 35.82.060.E.1 of the LUDC. The site is adequate in terms of location, physical characteristics, shape, and size to accommodate the type of use and level of development proposed, and the access easement is adequate. Significant impacts will be mitigated to the maximum extent feasible as demonstrated by the written checklist pursuant to State CEQA Guidelines Section 15168(c)(4). Streets and highways are adequate and properly designed to carry the type and quantity of traffic generated by the Proposed Project, and the County Public Works Roads Division and County Fire Department determined that existing road facilities are sufficient. There will be adequate public services, such as water provided by the Vista Hills Mutual Water Company, an existing septic system, and access from Santa Rita Road via an easement (Attachment 11). The Proposed Project will not be detrimental to the comfort, convenience, general welfare, health, and safety of the neighborhood and will be compatible with the surrounding area, in part because employees living onsite will mitigate traffic. The Policy Consistency analysis included in the Planning Commission staff report dated June 1, 2021 and included as Attachment 8, supports that the Proposed Project will conform to the goals and policies in the Comprehensive Plan. Lastly, the Proposed Project will be compatible with and subordinate to the rural and scenic character of the area, as the approximately three-acre Project area

is not visible to public viewing areas and is surrounded by hills, an ephemeral drainage, and agricultural crop lands.

The Findings are included as Attachment 1 to this Board Letter.

**Appeal Issue No. 4: Deficient PEIR and CEQA Checklist**

The Appellant states that the County cannot make the required CEQA findings and that the Commission overlooked significant environmental issues that are not addressed in the Cannabis PEIR. Additionally, the Appellant contends that staff failed to address deficiencies in the CEQA Checklist and states that the Applicant did not submit documentation from the State Water Resources Control Board. Lastly, the Appellant states that the Applicant did not submit a Phase I cultural study.

**Staff Response:**

The County can make required CEQA findings, and the Commission did not overlook significant environmental issues that are not addressed in the previously certified Cannabis PEIR. Environmental conditions unique to this parcel were appropriately analyzed through the review of the Conditional Use Permit and CEQA Checklist that was prepared pursuant to CEQA Guidelines Section 15168 (c)(4). The findings and analyses presented to the Commission and to the Board (Attachments 1, 3 and 4), discuss that the PEIR provides adequate environmental review, and no subsequent environmental review is needed.

On February 6, 2018, the Board certified the PEIR that analyzed the environmental impacts of the Cannabis Program. The PEIR was prepared in accordance with the State CEQA Guidelines Section 15168 and evaluated the Cannabis Program’s impacts with regard to the following environmental resources and subjects:

- Aesthetics and Visual Resources
- Agricultural Resources
- Air Quality and Greenhouse Gas Emissions
- Biological Resources
- Cultural Resources
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use
- Noise Transportation and Traffic
- Utilities and Energy Conservation
- Population, Employment, and Housing

The PEIR evaluated the direct and indirect impacts, as well as the project-specific and cumulative impacts, that would result from the implementation of the Cannabis Program. The PEIR identified a number of significant impacts and set forth feasible mitigation measures that were included as development standards and requirements in the land use and licensing ordinances, which are applied to site-specific land use entitlement and business licensing applications for commercial cannabis operations authorized under the Cannabis Program. The PEIR concluded that unavoidable and significant (Class I) impacts would result from the Cannabis Program with regard to the following environmental resources or issues:

- Aesthetics and visual resources
- Agricultural resources
- Air quality (including odor impacts)
- Noise
- Transportation and traffic

The Board adopted a Statement of Overriding Considerations concluding that the benefits of the Program outweigh the unavoidable adverse environmental effects identified above. Under State CEQA Guidelines Sections 15162 and 15168, following certification of a PEIR, later activities within the Program that will not result in environmental effects not examined in the PEIR may be approved under the PEIR unless a subsequent environmental document is required under Section 15162. Pursuant to Section 15162, a subsequent environmental document shall not be prepared unless there are: 1) substantial changes to the project; 2) substantial changes to the circumstances under which the project will be undertaken; and/or 3) new information of substantial importance, which was not and could not have been known at the time the previous environmental document was completed, regarding new or substantially more severe significant impacts, or new or newly feasible mitigation measures or project alternatives. The Proposed Project does not meet any of these criteria, and therefore no subsequent environmental document is needed for this Project.

On October 1, 2020, pursuant to the State CEQA Guidelines Section 15168(c)(4), staff completed the Checklist for Commercial Cannabis Land Use Entitlement and Licensing Applications (Attachment 3) and determined that all of the environmental impacts of the Project were within the scope of the project covered by the PEIR for the Cannabis Program. Staff updated the Checklist on April 12, 2021 to include a reduced total cultivation area from 2.94 acres to 2.54 acres, remove the previously proposed onsite compost area, and attach the Statement of Overriding Consideration regarding the PEIR. Staff updated the Checklist again on September 1, 2021 to incorporate the revised Project Description. The CEQA Checklist is not deficient, and it demonstrates that the Proposed Project will not create any new significant effects or a substantial increase in the severity of previously identified significant effects on the environment. There is no new information of substantial importance under State CEQA Guidelines Section 15162 warranting the preparation of a new environmental document for the Proposed Project.

As demonstrated by the CEQA Checklist, the Applicant submitted documentation from the Central Coast Regional Quality Control Board (RWQCB) included as Attachment 13. The RWQCB reviewed the Proposed Project and determined that it meets the requirements for the State Water Board's Cannabis Cultivation Waste Discharge Regulatory Program. The State Water Board assigned waste discharge identification (WDID) number 3\_42CC406403 to the Proposed Project. The Applicant is required to prepare and submit annual reports to the RWQCB as part of the California State Licensing process.

As demonstrated by the CEQA Checklist, the Applicant submitted a Phase I Cultural Resources Assessment that was prepared in April 2020 by Allison Jaqua of A Jaqua Consulting in accordance with the County of Santa Barbara Cultural Resources Threshold and Guidelines. No cultural resources were observed during the Phase I field survey, and the report concluded that the Project will have no effect on archaeological resources. No new structures are proposed. Cannabis cultivation will take place in raised beds, in the ground, or in pots. In the unlikely event that subsurface resources are encountered onsite, as conditioned in Attachment 2 (Condition No. 4), the Applicant will stop work immediately, contact P&D staff, and retain a P&D-approved archaeologist and Native American representative to evaluate the



significance of the find. This standard discovery process will ensure that the potential for impacts to cultural resources during Project construction and operations activities is less than significant.

The PEIR (Attachment 4) considered together with the CEQA Checklist (Attachment 3) is adequate, and subsequent analysis of the environmental impacts of the Proposed Project is not required pursuant to CEQA Guidelines Sections 15162 and 15168(c)(2).

**Appeal Issue No. 5: Truncated and Rushed Hearing**

The Appellant asserts that the Commission approved the Proposed Project under a truncated and rushed hearing, depriving the Appellant of a fair and impartial hearing.

**Staff Response:**

The Commission approved the Proposed Project with vote of 5 to 0 at a hearing that was conducted in a fair and impartial manner. The required notice of the hearing was provided, and all attendees, including the Appellant, were given a fair opportunity to address the Commission. The County Planning Commission hearing on June 9, 2021 followed all procedural standards outlined in the Santa Barbara County Planning Commission Procedures Manual (Procedures Manual), including but not limited to the Order of Public Hearings and Procedure for Conduct of Public Hearings. Consistent with the Procedures Manual, the Chair of the Commission invited the general public to give testimony about the Proposed Project after staff and Applicant presentations. The Appellant provided both written and oral testimony on the Proposed Project, raising the issues that are the subject of this appeal. After hearing staff presentation, Applicant presentation, public testimony, and considering the evidence presented as part of the record, the Commission granted approval of the Proposed Project.

**D. Conclusion:**

For the reasons discussed above, staff finds that the appeal issues raised are without merit. Planning and Development staff recommends that the Board approve the Project *de novo* based on the findings provided as Attachment 1.

**Fiscal and Facilities Impacts:**

Budgeted: Yes

Total costs for processing the appeal are approximately \$19,000 (75 hours of staff time). The costs for processing cannabis project appeals are partially offset by a fixed appeal fee and cannabis tax revenues. The fixed appeal fee was paid by the Appellant in the amount of \$701.06. Funding for this project is budgeted in the Planning and Development Department's Permitting Budget Program on page D-301 of the County of Santa Barbara Fiscal Year (FY) 2021-22 adopted budget.

**Special Instructions:**

The Clerk of the Board shall publish a legal notice at least 10 days prior to the hearing on September 21, 2021. The notice shall appear in the Lompoc Record. The Clerk of the Board shall also fulfill mailed noticing requirements. The Clerk of the Board shall forward a minute order of the hearing to the attention of Gwen Beyeler and return one printed copy of the Cannabis Program PEIR to the Planning and Development Department Hearing Support.

**Attachments:**

1. Findings
2. Conditions of Approval with Departmental Condition Letters
3. CEQA Checklist dated August 1, 2021
4. Link to Program EIR
5. Appeal Letter dated June 18, 2021
6. Project Plans dated April 23, 2021
7. Odor Abatement Plan dated April 23, 2021
8. Planning Commission Staff Report dated June 1, 2021 and associated Attachments
9. Biological Resources Assessment dated August 14, 2020
10. Biological Resources Assessment Addendum, Tree Protection Plan, Habitat Protection Plan, and Wildlife Movement Plan dated September 2021
11. Deed of Easement and Agreement Among Land Owners dated July 26, 1988
12. Vista Hills Mutual Water Company Water Service Letter
13. Central Coast Regional Water Quality Control Board Notice of Applicability, dated December 21, 2018

**Authored by:**

Gwen Beyeler, Planner, (805) 934-6269  
Development Review Division, Planning and Development Department