

Attachment 10 – Supplemental Comprehensive Plan Policy Consistency Analysis

REQUIREMENT	DISCUSSION
<i>Land Use Element – Groundwater Resources Policies</i>	
<p><i>Groundwater Resources Policy 3.2:</i> <i>The County shall conduct its land use planning and permitting activities in a manner which promotes and encourages the cooperative management of groundwater resources by local agencies and other affected parties, consistent with the Groundwater Management Act and other applicable law.</i></p> <p><i>Groundwater Resources Policy 3.5:</i> <i>In coordination with any applicable groundwater management plan(s), the County shall not allow, through its land use permitting decisions, any basin to become seriously over drafted on a prolonged basis.</i></p> <p><i>Groundwater Resources Policy 3.6:</i> <i>The County shall not make land use decisions which would lead to the substantial over commitment of any groundwater basin.</i></p>	<p>Consistent with the Conservation Element Groundwater Resources Policies 3.2, 3.5, and 3.6, the Proposed Project will not result in any groundwater basin becoming seriously over drafted on a prolonged basis or lead to a substantial over commitment of any groundwater basin.</p> <p>The Proposed Project site is located in the Santa Rita Uplands sub-basin of the Santa Ynez River Valley Groundwater basin. The Santa Barbara County Environmental Thresholds and Guidelines Manual does not identify a threshold for this particular sub-basin. The Santa Ynez River Valley Basin is defined by the California Department of Water Resources (DWR) as a medium priority basin. The Sustainable Groundwater Management Act (SGMA) requires Groundwater Sustainability Agencies (GSAs) to be formed and to develop and implement Groundwater Sustainability Plans (GSPs) in medium- and high-priority basins. Three separate GSAs have been formed to represent the three management areas of the Santa Ynez River Valley Groundwater basin, and GSPs are in development. The Proposed Project will be subject to the Western Management Area Groundwater Sustainability Agency’s GSP and will be required to be operated in compliance with all applicable rules and regulations adopted by the GSA. At this time, no pumping limitations have been identified. If pumping limitations are identified in the future, the Applicant would be subject to those restrictions pursuant to the GSA’s authority.</p> <p>The Proposed Project includes approximately 86.8 acres of outdoor cannabis cultivation and</p>

	<p>nursery located in areas of the site historically used for strawberries, celery, broccoli, kale, romaine, peppers and grain (Attachment 3 to the Board Agenda Letter, dated June 9, 2021). The proposed 86.8 acre cultivation area will not result in an increase in the area that was previously farmed. The average AFY between these crops is 237 AFY. Cultivation of celery in the same footprint would require 332 AFY. The projected water use for the Proposed Project is approximately 124.80 acre-feet per year, which is 190.2 AFY less than the property's estimated historic baseline use while under the previously cultivated crops. Therefore, the Proposed Project will not lead to the substantial over-commitment of the groundwater basin.</p>
<i>Agricultural Element</i>	
<p><i>Agricultural Element, Policy 1.E:</i> <i>The County shall recognize that the generation of noise, smoke, odor and dust is a natural consequence of the normal agricultural practices provided that agriculturalists exercise reasonable measures to minimize such effects.</i></p>	<p>The Proposed Project is consistent with the goals and policies that enhance agricultural production. A Noise Plan was prepared and concluded that noise generated by the Proposed Project will not exceed 65 decibels, consistent with the Noise Element of the Comprehensive Plan. The nearest residentially zoned area is located 0.72 miles northwest of the cannabis cultivation area. Additionally, no generators are proposed. The Proposed Project is anticipated to generate odors from cannabis cultivation harvesting activities. The Proposed Project will remove harvested cannabis from the site on the same day as harvest in order to minimize odors. However, no odor abatement requirements are applicable to this project as the Proposed Project does not require the approval of a Conditional Use Permit and is not proposing any onsite processing.</p>