

## ATTACHMENT 11: COUNTY LAND USE PLANS AND POLICIES CONSISTENCY SUMMARY

Policy Requirement	Project Consistency Analysis:
<b>Santa Barbara County Coastal Land Use Plan (CLUP)</b>	
<b>General Policies</b>	
<b>Policy 1-2:</b> Where policies within the land use plan overlap, the policy which is the most protective of coastal resources shall take precedence.	<b>Consistent.</b> In the coastal zone, the Project and associated licensing of activities upon eligible lands would be reviewed to ensure that the most coastal resource protective policies would prevail. While agricultural uses are permitted in designated agricultural and industrial zones in coastal areas, cannabis cultivation would be prohibited in Coastal Dependent Industry (M-CD), Coastal Related Industry (M-CR), Mountainous Areas, Environmentally Sensitive Habitat Overlay, and Resource Management (RES) zone districts. Therefore, the proposed Project would be consistent with this policy.
<b>Policy 1-3:</b> Where there are conflicts between the policies set forth in the coastal land use plan and those set forth in any element of the County's Comprehensive Plan or existing ordinances, the policies of the coastal land use plan shall take precedence.	<b>Consistent.</b> In the coastal zone, future land use permit and licensing applications would be evaluated by the County Planning and Development Department for consistency with coastal resource protection policies. Therefore, the Project would be consistent with this policy.
<b>Policy 1-4:</b> Prior to the issuance of a coastal development permit, the County shall make the finding that the development reasonably meets the standards set forth in all applicable land use plan policies.	<b>Consistent.</b> All development of cannabis-related structures in the coastal zone would be subject to existing County policies and regulations protecting environmental and natural resources to control where and how development occurs. The Project allows for cultivation where public services would meet the needs of cannabis cultivation operations. County Planning and Development staff would also review all permit and license applications for cannabis cultivation, manufacturing, testing, distribution, and retail activities on a case-by-case basis. Through this project review process, the Department can make findings on whether the cannabis facilities meet applicable coastal policies. If the decision-making authority cannot make the requisite findings of approval to issue a coastal development permit, the application for a coastal development permit must be denied. Therefore, the Project would be consistent with this policy.
<b>Coastal Act Policies</b>	
<b>30250. (a)</b> New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources. In addition, land divisions, other than leases, for agricultural uses, outside existing developed areas shall be permitted only where 50	<b>Consistent.</b> The Project includes development standards that apply to and serve to regulate cannabis activities. As such, the proposed Project would allow certain types of cannabis activities, by zone district. The Project also allows for cultivation in urban and rural areas where public services would meet the needs of cannabis cultivation operations. While most existing cannabis activities in the coastal zone would be sited on existing developed areas where there are adequate public services, such as roads and water supply connections, additional regulatory requirements and standard operating procedures for specific cannabis businesses may be necessary to avoid or minimize the effects of cultivation activities that may require the construction of new infrastructure, such as roads and utility connections to support operations. Permit review by Planning and Development staff would enable additional development measures to ensure consistency with this policy.

Policy Requirement	Project Consistency Analysis:
<p>percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels.            (b) Where feasible, new hazardous industrial development shall be located away from existing developed areas.</p>	
<p><b>30231.</b> The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging wastewater reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.</p>	<p><b>Consistent.</b> One of the objectives of the proposed Project is to minimize adverse effects of cannabis activities on the environment. The implementation of development standards would regulate cannabis activities and would ensure such activities maintain biological productivity and minimize effects of waste water discharges. Additional regulatory measures, such as Best Management Practices (BMPs), may be imposed on a case-by-case basis during site-specific project review to protect natural resources. Therefore, the Project would be consistent with this policy.</p>
<p><b>30241.</b> The maximum amount of prime agricultural land shall be maintained in agricultural production to assure the protection of the areas' agricultural economy, and conflicts shall be minimized between agricultural and urban land uses through all of the following:            a. By establishing stable boundaries separating urban and rural areas, including, where necessary, clearly defined buffer areas to minimize conflicts between agricultural and urban uses.            b. By limiting conversions of agricultural lands around the periphery of urban areas to the lands where the viability of existing agricultural use is already severely limited by conflicts with urban uses or where the conversion of the lands would complete a logical and viable neighborhood and contribute to the</p>	<p><b>Consistent.</b> Conflicts between agricultural and urban land uses would be minimized through the zoning requirements and development standards of the Project. The Project description was developed by comparing the proposed cannabis activities with other uses permitted in the various zones, including agricultural zones, and then requiring the appropriate type of permit. Based on State law, the Project includes buffers from schools, which will further minimize land use incompatibility issues. Though the loss of prime soils would potentially occur due to the construction of ancillary agricultural support structures, these ancillary structures (e.g. roads, buildings) would be constructed in support of the agricultural use of the land, similar to existing agricultural support infrastructure. Moreover, the Project includes a development standard to avoid the siting of structures on prime agricultural soils to the maximum extent feasible, thus retaining prime soils for agricultural production. Overall, the Project supports agricultural production and would not induce conversion of agricultural lands to non-agricultural uses. Therefore, the Project is consistent with Coastal Act Policy 30241 a through f.</p>

Policy Requirement	Project Consistency Analysis:
<p>establishment of a stable limit to urban development.</p> <p>c. By permitting the conversion of agricultural land surrounded by urban uses where the conversion of the land would be consistent with Section 30250.</p> <p>d. By developing available lands not suited for agriculture prior to the conversion of agricultural lands.</p> <p>e. By assuring that public service and facility expansions and non-agricultural development do not impair agricultural viability, either through increased assessment costs or degraded air and water quality.</p> <p>f. By assuring that all divisions of prime agricultural lands, except those conversions approved pursuant to subdivision (b) of this section, and all development adjacent to prime agricultural lands shall not diminish the productivity of such prime agricultural lands.</p>	
<p><b>30242.</b> All other lands suitable for agricultural use shall not be converted to nonagricultural uses unless: (1) continued or renewed agricultural use is not feasible, or (2) such conversion would preserve prime agricultural land or concentrate development consistent with Section 30250. Any such permitted conversion shall be compatible with continued agricultural use on surrounding lands.</p>	<p><b>Consistent.</b> The Project would not result in the conversion of lands suitable for agricultural use to non-agricultural uses. Please also refer to the Coastal Act Policy 30241 discussion above.</p>
<p><b>30243.</b> The long-term productivity of soils and timberlands shall be protected, and conversions of coastal commercial timberlands in units of commercial size to other uses or their division into units of noncommercial size shall be limited to providing for necessary timber, processing and related facilities.</p>	<p><b>Consistent.</b> The Project would not result in the conversion of lands suitable for agricultural use to non-agricultural uses. Please also refer to the Coastal Act Policy 30241 discussion above.</p>
<p><b>30251.</b> The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be</p>	<p><b>Consistent.</b> The Project involves the implementation of development standards and all development of cannabis-related structures would be subject to County regulations protecting environmental and natural resources, thereby controlling where and how development occurs in</p>

Policy Requirement	Project Consistency Analysis:
<p>sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas.</p>	<p>the urban and rural area of the coastal zone. Coastal development permits would also be issued by the County Planning and Development on a case-by-case basis and may include site-specific standards related to site fencing and lighting to ensure scenic views are maintained and the activities are compatible with the surrounding areas. Such standards would ensure cannabis facilities sited within the coastal zone protect scenic and visual qualities. Therefore, the Project would be consistent with this policy.</p>
<b>Development Policies</b>	
<p><b>Policy 2-9:</b> The County shall give equal priority to the following land uses in the coastal zone of Montecito and Summerland:</p> <ul style="list-style-type: none"> <li>• Expansion of public recreational opportunities</li> <li>• Visitor-serving commercial uses (e.g., restaurants, retail commercial, motels)</li> <li>• Low- and moderate-income housing</li> <li>• Agricultural expansion</li> </ul> <p>In Goleta, the County shall give highest priority to low and moderate income housing and agricultural expansion followed by public recreation and visitor-serving commercial uses.</p>	<p><b>Consistent.</b> This policy requires the County to prioritize certain land use projects in the coastal zone, including agricultural expansion. Cannabis cultivation is considered an agricultural use that requires a higher level of scrutiny; therefore, the Project would expand agricultural uses in the coastal zone. Further, the Project would promote agricultural uses that are consistent with applicable plans, policies, and development standards. Therefore, the Project would be consistent with this policy.</p>
<p><b>Policy 2-11:</b> All development, including agriculture, adjacent to areas designated on the land use plan or resource maps as environmentally sensitive habitat areas, shall be regulated to avoid adverse impacts on habitat resources. Regulatory measures include, but are not limited to, setbacks, buffer zones, grading controls, noise restrictions, maintenance of natural vegetation, and control of runoff.</p>	<p><b>Consistent.</b> One of the objectives of the proposed Project is to minimize adverse effects of cannabis activities on the environment, natural resources, and wildlife. Thus, the project has been designed to avoid or mitigate impacts to riparian corridors, wetlands, other sensitive habitats, water supply, water quality, and instream flows. The implementation of development standards would regulate cannabis cultivation activities and ensure development adjacent to environmentally sensitive habitat areas avoids impacts on habitat resources. If impacts to sensitive vegetation cannot be feasibly avoided, the Project requires implementation of measures such as Tree Projection Plans or Habitat Protection Plans to mitigate any adverse effects.</p>
<b>Hillside and Watershed Protection Policies</b>	
<p><b>Policy 3-14:</b> All development shall be designed to fit the site topography, soils, geology, hydrology, and any other existing conditions and be oriented so that grading and other site preparation is kept to an absolute minimum. Natural features, landforms, and native vegetation, such as trees, shall be preserved to</p>	<p><b>Consistent.</b> The Project involves the regulation of cannabis activities via zoning restrictions and the implementation of development standards to minimize effects on the environment. Site-specific standards may also be required on a case-by-case basis. Additionally, individual proposed cannabis sites would be subject to the County's Grading Ordinance and NPDES requirements, which regulate local storm water impacts to avoid sediment and other pollution to local water courses and drainages. These development and site-specific standards would ensure</p>

Policy Requirement	Project Consistency Analysis:
<p>the maximum extent feasible. Areas of the site which are not suited for development because of known soil, geologic, flood, erosion or other hazards shall remain in open space.</p>	<p>cannabis activities minimize impacts related to topography, soils, geology, and hydrology. Therefore, the Project would be consistent with this policy.</p>
<p><b>Policy 3-15:</b> For necessary grading operations on hillsides, the smallest practical area of land shall be exposed at any one time during development, and the length of exposure shall be kept to the shortest practicable amount of time. The clearing of land should be avoided during the winter rainy season and all measures for removing sediments and stabilizing slopes should be in place before the beginning of the rainy season.</p>	<p><b>Consistent.</b> The Project involves the implementation of development standards to ensure cannabis activities do not compromise the quality of the environment. Site-specific standards may also be required on a case-by-case basis. These development standards, as well as site-specific standards would apply to all cannabis activities to ensure appropriate erosion and sediment control measures are implemented in accordance with Grading Ordinance regulations (Ord. No. 4766, 11-9-2010). Therefore, the Project would be consistent with this policy.</p>
<p><b>Policy 3-16:</b> Sediment basins (including debris basins, desilting basins, or silt traps) shall be installed on the project site in conjunction with the initial grading operations and maintained throughout the development process to remove sediment from runoff waters. All sediment shall be retained on site unless removed to an appropriate dumping location.</p>	<p><b>Consistent.</b> The Project involves the implementation of development standards, as well as site-specific standards that may be required on a case-by-case basis to ensure cannabis activities that involve initial grading include the installation of sediment basins and other features to capture and remove on-site sediment. Specific permit requirements may also be required to ensure appropriate erosion and sediment control measures are implemented in accordance with Grading Ordinance regulations (Ord. No. 4766, 11-9-2010).</p>
<p><b>Policy 3-17:</b> Temporary vegetation, seeding, mulching, or other suitable stabilization method shall be used to protect soils subject to erosion that have been disturbed during grading or development. All cut and fill slopes shall be stabilized immediately with planting of native grasses and shrubs, appropriate nonnative plants, or with accepted landscaping practices.</p>	<p><b>Consistent.</b> The Project involves the implementation of development standards, and may require site-specific standards on a case-by-case basis to ensure cannabis activities protect existing slopes and vegetation during grading or development. These standards would apply to all cannabis activities. Specific permit application requirements may also be required to ensure appropriate slope stability, soil protection, erosion, and sediment control measures are implemented in accordance with Grading Ordinance regulations (Ord. No. 4766, 11-9-2010).</p>
<p><b>Policy 3-18:</b> Provisions shall be made to conduct surface water to storm drains or suitable watercourses to prevent erosion. Drainage devices shall be designed to accommodate increased runoff resulting from modified soil and surface conditions as a result of development. Water runoff shall be retained on-site whenever possible to facilitate groundwater recharge.</p>	<p><b>Consistent.</b> One of the objectives of the Project is to minimize adverse effects of cannabis activities on the environment, natural resources, and wildlife, including riparian corridors, wetlands and sensitive habitats, as well as effects on water supply, water quality, and instream flows. The implementation of the development standards, as well as site-specific standards on a case-by-case basis through Planning and Development permit review would ensure development prevents erosion and minimizes on-site runoff. The Project would be consistent with this policy.</p>

Policy Requirement	Project Consistency Analysis:
<p><b>Policy 3-19:</b> Degradation of the water quality of groundwater basins, nearby streams, or wetlands shall not result from development of the site. Pollutants, such as chemicals, fuels, lubricants, raw sewage, and other harmful waste, shall not be discharged into or alongside coastal streams or wetlands either during or after construction.</p>	<p><b>Consistent.</b> One of the objectives of the Project is to minimize adverse effects of cannabis activities on the environment. Additionally, the mitigation measures related to Cannabis Waste Discharge Requirements General Order, addresses impacts to water quality. The mitigation requires that cannabis cultivators provide evidence of compliance with the State Water Resources Control Boards' requirements (or certification by the appropriate Water Board stating a permit is not necessary) prior to issuance of permit or license. Additional regulatory measures, such as BMPs may be imposed on a case-by-case basis during site-specific project review to protect natural resources. Therefore, the Project would be consistent with this policy.</p>
<p><b>Policy 3-20:</b> All development within the coastal zone shall be subject to the slope density curve (Plate A) of the County Zoning Ordinance No. 661 (Article VII, Section 20). However, in no case shall above-ground structures, except for necessary utility lines and fences for agricultural purposes, be sited on undisturbed slopes exceeding 40 percent.</p>	<p><b>Consistent.</b> One of the objectives of the Project is to minimize adverse effects of cannabis activities on the environment, natural resources, and wildlife, including riparian corridors, wetlands and sensitive habitats, as well as effects on water supply, water quality, and instream flows. As such, cannabis activities are not eligible for licensing in the MT overlay zones, which are marked by 40 percent or greater slopes. Therefore, the Project would be consistent with this policy.</p>
<p><b>Policy 3-23:</b> In order to protect scenic resources, water quality, and community character, and reduce land form alteration, greenhouses and greenhouse related development shall be prohibited on slopes in excess of 10 percent within Area B of the Carpinteria Agricultural Overlay District. Greenhouse or greenhouse related development may be approved on slopes between 5 and 10 percent, subject to a Conditional Use Permit.</p>	<p><b>Consistent.</b> One of the objectives of the Project is to minimize adverse effects of cannabis activities on the environment, as well as effects on water supply, water quality, and instream flows. Regulatory measures, such as BMPs may be implemented on a case-by-case basis to protect steep slopes, cannabis activities must be consistent with all applicable County policies. Therefore, the prohibition of greenhouse and greenhouse related development on slopes greater than 10 percent in Area B of the Carpinteria Agricultural Overlay District will be applied, and the Project would be consistent with this policy.</p>
<p><b>Visual Resource Policies</b></p>	
<p><b>Policy 4-1:</b> Areas within the coastal zone which are now required to obtain approval from the County Board of Architectural Review, because of the requirements of the "D"- Design Supervision Combining Regulations or because they are within the boundaries of Ordinance #453, shall continue to be subject to design review. In addition, developments in all areas designated on the land use plan maps as Commercial, Industrial, or Planned Development and</p>	<p><b>Consistent.</b> Cannabis cultivation, manufacturing, testing, distribution, or retail activities proposed in coastal areas, and those on bluff top lots would require approval from the County Board of Architectural Review as outlined in the coastal zone policy. This policy would apply to buildings and structures, including ancillary structures to cultivation operations such as processing and packaging facilities. The implementation of development standards would provide additional protections in bluff top lots in the coastal zone. Therefore, the Project would be consistent with this policy.</p>

Policy Requirement	Project Consistency Analysis:
residential structures on bluff top lots shall be required to obtain plan approval from the County BAR.	
<b>Policy 4-2:</b> All commercial, industrial, planned development, and greenhouse projects shall be required to submit a landscaping plan to the County for approval.	<b>Consistent.</b> Types of cannabis cultivation generally include medium to large greenhouse growers. Given that the County currently contains a range of cultivation types, including greenhouses, these projects would be reviewed on a case-by-case basis, which includes compliance with existing policy requirements. Where existing facilities are proposed for cannabis-related use, and no new physical development or minor development is proposed, the County may reduce the extent of landscape plan review on a case-by-case basis. The Project is consistent with this policy.
<b>Policy 4-3:</b> In areas designated as rural on the land use plan maps, the height, scale, and design of structures shall be compatible with the character of the surrounding natural environment, except where technical requirements dictate otherwise. Structures shall be subordinate in appearance to natural landforms; shall be designed to follow the natural contours of the landscape; and shall be sited so as not to intrude into the skyline as seen from public viewing places.	<b>Consistent.</b> The County currently contains a wide range of cannabis cultivation types and locations, including medium to large greenhouse growers, outdoor growers on mountain hillsides, and indoor growers in commercial and industrial areas. All of these cultivation types would need to ensure the design and layout of the facility structures are compatible with the surrounding natural environment in order to minimize visual effects. As a result, each activity would be reviewed on a case-by-case basis by Planning and Development staff during permit review and prior to issuance of a license. Further, cannabis sites proposed within areas that are subject to design guidelines (e.g., within community planning areas) would undergo architectural review and would be required to be proven consistent with all applicable design guidelines. These review processes would ensure the proposed activities and any structures are designed to be compatible with the surrounding environment. As a result, the Project would be consistent with this policy.
<b>Policy 4-4:</b> In areas designated as urban on the land use plan maps and in designated rural neighborhoods, new structures shall be in conformance with the scale and character of the existing community. Clustered development, varied circulation patterns, and diverse housing types shall be encouraged.	<b>Consistent.</b> The County currently contains a wide range of cannabis cultivation types and locations, including medium to large greenhouse growers, outdoor growers on mountain hillsides, and indoor growers in commercial and industrial areas. All of these cultivation types would need to ensure the commercial structures, such as outbuildings, warehouses, and other structures are compatible with the existing community. Each new structure would be reviewed on a case-by-case basis during environmental review and prior to project approval. Additionally, as described above, cannabis sites proposed within areas that are subject to design guidelines would undergo architectural review and would be required to be proven consistent with all applicable design guidelines. This review process would ensure the proposed activities and any structures are designed to be compatible with the scale and character of the existing community. As a result, the Project would be consistent with this policy.
<b>Agriculture Policies</b>	
<b>Policy 8-2:</b> If a parcel is designated for agricultural use and is located in a rural area not contiguous with	<b>Consistent.</b> The Project is likely to result in construction of ancillary agricultural support structures (e.g. roads, buildings). Such structures would support the agricultural use of the land.

Policy Requirement	Project Consistency Analysis:
<p>the urban/rural boundary, conversion to non-agricultural use shall not be permitted unless such conversion of the entire parcel would allow for another priority use under the Coastal Act, e.g., coastal dependent industry, recreation and access, or protection of an environmentally sensitive habitat. Such conversion shall not be in conflict with contiguous agricultural operations in the area, and shall be consistent with Section 30241 and 30242 of the Coastal Act.</p>	<p>Moreover, the Project includes a development standard to avoid the siting of structures on prime agricultural soils to the maximum extent feasible, thus retaining prime soils for agricultural production. Overall, the Project supports agricultural production and would not induce conversion of agricultural lands to non-agricultural uses. Therefore, the Project is consistent with this policy.</p>
<p><b>Policy 8-5:</b> All greenhouse projects of 20,000 or more square feet and all additions to existing greenhouse development, i.e., greenhouse expansion, packing sheds, or other development for a total of existing and additions of 20,000 or more square feet, shall be subject to County discretionary approval and, therefore, subject to environmental review under County CEQA guidelines.</p>	<p><b>Consistent.</b> The County supports a range of agricultural greenhouses, particularly in the Carpinteria, Lompoc, and Los Alamos areas. Consistent with this policy, all cannabis cultivation greenhouses that involve new construction or additions over 20,000 or more square feet are subject to County discretionary approval and environmental review. In addition, for the purposes of the proposed Project, cannabis is considered to be an agricultural use that requires a higher level of scrutiny than normal agriculture. Any cannabis activity will be required to follow additional development standards and each project will be reviewed on a case-by-case basis for compliance with these standards. Therefore, the proposed Project is consistent with this policy.</p>
<p><b>Policy 8-6:</b> No greenhouse, hothouse, or accessory structure shall be located closer than 50 feet from the boundary line of a lot zoned residential.</p>	<p><b>Consistent.</b> The County supports a range of agricultural greenhouses, hothouses, and accessory structures for agricultural uses. Consistent with this policy, cannabis cultivation facilities would need to be sited 50 feet or more from the boundary line of a residential use within the coastal zone. In addition, for the purposes of the proposed Project, cannabis is considered to be an agricultural use that requires a higher level of scrutiny than normal agriculture. Any cannabis activity will be required to follow additional development standards and each project will be reviewed on a case-by-case basis for compliance with these standards. All permits would be reviewed to ensure consistency with this policy, and such measures as a revision to the site plans may be imposed. Therefore, the proposed Project is consistent with this policy.</p>
<p><b>Policy 8-7:</b> Landscaping and screening shall be installed within 6 months of completion of new greenhouses and/or accessory buildings. Such landscaping shall reasonably block the view of greenhouse structures and parking areas from the nearest public road(s) within 5 years of project completion.</p>	<p><b>Consistent.</b> All new greenhouses and agricultural accessory buildings would include landscaping and screening on a case-by-case basis. The proposed Project includes development standards that require site fencing, lighting, and other controls, as well as landscape and screening requirements that would ensure views from public roads into the agricultural facilities are minimized. In addition, for the purposes of the proposed Project, cannabis is considered to be an agricultural use that requires a higher level of scrutiny than normal agriculture. Any cannabis activity will be required to follow additional development standards and each project will be reviewed on a case-</p>



Policy Requirement	Project Consistency Analysis:
	by-case basis for compliance with these standards. Therefore, the proposed Project would be consistent with this policy.
<p><b>Policy 8-11:</b> The following requirements shall apply to greenhouse and greenhouse related development within the Carpinteria Valley to protect the long-term productivity of prime agricultural soils:</p> <p>a. Greenhouse operations on prime agricultural soils shall encourage use of in-soil cultivation methods</p> <p>b. Prime agricultural soils shall not be modified with sterilants or other chemicals that would adversely affect the long-term productivity of the soil.</p> <p>c. The removal of prime agricultural soils shall be prohibited, including removal of indigenous prime soils used as a growing medium for container plants which are sold intact.</p>	<p><b>Consistent.</b> The proposed Project would allow cultivation of cannabis in AG-I, AG-II, M-RP, M-1, and M-2 zone districts. As such, all cultivation activities would need to follow applicable coastal plan policies related to greenhouse development in the Carpinteria Valley to ensure the protection of prime agricultural soils. The proposed Project does not specifically reference applicable coastal policies, but each project would be reviewed on a case-by-case basis to ensure consistency with this policy, and conditions may be imposed. In addition, for the purposes of the proposed Project, cannabis is considered to be an agricultural use that requires a higher level of scrutiny than normal agriculture. Any cannabis activity will be required to follow additional development standards and each project will be reviewed on a case-by-case basis for compliance with these standards. Therefore, the proposed Project is consistent with this policy.</p>
<p><b>Policy 8-12:</b> No increase in greenhouses or greenhouse related development within the Carpinteria Valley shall result from divisions or redivisions of land, redesignations or rezonings of AG-I or AG-II, or other land uses, subsequent to the date of Commission action on LCP amendment STB-MAJ-2-02.</p>	<p><b>Consistent.</b> The proposed Project may result in an increase in greenhouse growers. However, the proposed Project does not promote the division or redivision of land, or redesignation or rezoning of AG-I or AG-II parcels. In addition, for the purposes of the proposed Project, cannabis is considered to be an agricultural use that requires a higher level of scrutiny than normal agriculture. Any cannabis activity will be required to follow additional development standards and each project will be reviewed on a case-by-case basis for compliance with these standards. Therefore, the proposed Project would be consistent with this policy.</p>
<b>Environmentally Sensitive Habitat Areas</b>	
<p><b>Policy 9-1:</b> Prior to the issuance of a development permit, all projects on parcels shown on the land use plan and/or resource maps with a Habitat Area overlay designation or within 250 feet of such designation or projects affecting an environmentally sensitive habitat area shall be found to be in conformity with the applicable habitat protection policies of the land use plan. All plans (e.g., development plans, grading plans), shall show the precise location of the habitat(s) potentially affected by the proposed project. Projects which could</p>	<p><b>Consistent.</b> The proposed Project would not allow the permitting or operation of cannabis activities within any ESHA; however, the proposed Project would be subject to a conformity analysis with applicable habitat protection policies of the land use plan on a case-by-case basis, if the cannabis activity were located adjacent to or otherwise in proximity to a Habitat Area overlay. As a result, the approval of any grading plan, or related development permit may be subject to a site inspection by a qualified biologist prior to approval by the County. The proposed Project is required to comply with this policy and conditions may be imposed as part of the cannabis activity permit approval process. The proposed Project would be consistent with this policy.</p>

Policy Requirement	Project Consistency Analysis:
<p>adversely impact an environmentally sensitive habitat area may be subject to a site inspection by a qualified biologist to be selected jointly by the County and the applicant.</p>	
<p><b>Santa Barbara County Comprehensive Plan- Land Use Element</b></p>	
<p><b>4.</b> Prior to issuance of a development permit, the County shall make the finding, based on information provided by environmental documents, staff analysis, and the applicant, that adequate public or private services and resources (e.g., water, sewer, roads) are available to serve the proposed development. The applicant shall assume full responsibility for costs incurred in service extensions or improvements that are required as a result of the proposed project. Lack of available public or private services or resources shall be grounds for denial of the project or reduction in the density otherwise indicated in the land use plan. Affordable housing projects proposed pursuant to the Affordable Housing Overlay regulations, special needs housing projects or other affordable housing projects which include at least 50 percent of the total number of units for affordable housing or 30 percent of the total number of units affordable at the very low income level shall be presumed to be consistent with this policy if the project has, or is conditioned to obtain all necessary can and will serve letters at the time of final map recordation, or if no map, prior to issuance of land use permits.</p>	<p><b>Consistent.</b> Cannabis activities would not conflict with this policy because land use permits would be subject to County environmental, site development, and design standards prior to approval. This case-by-case review process would ensure the proposed activities can be connected to adequate public or private public services and utilities. However, given that cannabis cultivation has historically been known to use illegal water sources, additional provisions requiring the development be connected to an adequate public or private water connection may be required. As a result, the proposed Project would be consistent with this policy.</p>
<p><b>Hillside and Water Protection Policies</b></p>	
<p><b>2.</b> All developments shall be designed to fit the site topography, soils, geology, hydrology, and any other existing conditions and be oriented so that grading</p>	<p><b>Consistent.</b> One of the objectives of the Project is to minimize adverse effects of cannabis activities on the environment, natural resources and wildlife, including riparian corridors, wetlands and sensitive habitats, as well as effects on water supply, water quality, and instream flows. The</p>

Policy Requirement	Project Consistency Analysis:
<p>and other site preparation is kept to an absolute minimum. Natural features, landforms, and native vegetation, such as trees, shall be preserved to the maximum extent feasible. Areas of the site which are not suited to development because of known soil, geologic, flood, erosion or other hazards shall remain in open space.</p>	<p>implementation of development standards (e.g., compliance with the County’s Grading Ordinance, the prohibition of cannabis sites in ESHA and MT overlay areas), as well as site-specific standards on a case-by-case basis would ensure development is designed to fit the site topography, soils, geology, and hydrology. However, additional BMPs would need to be implemented to ensure the Project would be consistent with this policy.</p>
<p><b>3.</b> For necessary grading operations on hillsides, the smallest practical area of land shall be exposed at any one time during development and the length of exposure shall be kept to the shortest practicable amount of time. The clearing of land should be avoided during the winter rainy season and all measures for removing sediments and stabilizing slopes should be in place before the beginning of the rainy season.</p>	<p><b>Consistent.</b> All cannabis activities would be subject to development standards, as well as site-specific development standards, that would be developed on a case-by-case basis during discretionary and environmental review. Standards would include compliance with the County’s Grading Ordinance. As a result, the proposed Project would be consistent with this policy.</p>
<p><b>4.</b> Sediment basins (including debris basins, desilting basins, or silt traps) shall be installed on the project site in conjunction with the initial grading operations and maintained through the development process to remove sediment from runoff waters. All sediment shall be retained on site unless removed to an appropriate dumping location.</p>	<p><b>Consistent.</b> All cannabis activities under the proposed Project would be subject to development standards, as well as site-specific standards to ensure cannabis activities that involve initial grading include the installation of sediment basins and other features to capture and remove on-site sediment. These standards would be developed on a case-by-case basis during Planning and Development permit review. As a result, the proposed Project would be consistent with this policy.</p>
<p><b>5.</b> Temporary vegetation, seeding, mulching, or other suitable stabilization method shall be used to protect soils subject to erosion that have been disturbed during grading or development. All cut and fill slopes shall be stabilized as rapidly as possible with planting of native grasses and shrubs, appropriate non-native plants, or with accepted landscaping practices.</p>	<p><b>Consistent.</b> All cannabis activities under the proposed Project would be subject to development standards, as well as site-specific development standards that would be developed on a case-by-case basis during Planning and Development permit review. The Project’s development standards include compliance with the County’s Grading Ordinance. Site-specific standards may include temporary vegetation, seeding, and mulching activities to prevent soil erosion during grading. However, the Project does not include best management practices (BMPs) to specifically address impacts to sensitive habitat. With mitigation to identify and implement a range of feasible best management practices to prevent soil erosion and promote revegetation, the Project would be consistent with this policy.</p>
<p><b>6.</b> Provisions shall be made to conduct surface water to storm drains or suitable watercourses to prevent</p>	<p><b>Consistent.</b> One of the objectives of the Project is to minimize adverse effects of cannabis activities on water supply, water quality, and instream flows. Compliance with the County’s Grading</p>

Policy Requirement	Project Consistency Analysis:
erosion. Drainage devices shall be designed to accommodate increased runoff resulting from modified soil and surface conditions as a result of development. Water runoff shall be retained onsite whenever possible to facilitate groundwater recharge.	Ordinance and the implementation of development standards would ensure cannabis facilities minimize water quality discharges, prevent erosion, and retain on-site water runoff. Specific permit application requirements may also be required to ensure appropriate slope stability, soil protection, erosion, drainage, and sediment control measures are implemented in accordance Grading Ordinance regulations (Ord. No. 4766, 11-9-2010).
7. Degradation of the water quality of groundwater basins, nearby streams, or wetlands shall not result from development of the site. Pollutants, such as chemicals, fuels, lubricants, raw sewage, and other harmful waste, shall not be discharged into or alongside coastal streams or wetlands either during or after construction.	<b>Consistent.</b> One of the objectives of the Project is to minimize adverse effects of cannabis activities on water supply, water quality, and instream flows. The implementation of development standards would ensure cannabis facilities minimize water quality impacts. Moreover, the Project requires compliance with the State Water Board’s <i>Cannabis Waste Discharge Requirements General Order</i> to addresses impacts to water quality. All cannabis activity permits would be reviewed to ensure appropriate standards are in place, compliant with federal, state, and local regulations for the treatment of wastewater, solid waste, and other hazardous materials affecting water quality through project design and/or permit conditions. The Project would be consistent with this policy.
8. On any lands not Comprehensive Planned and zoned for agriculture, grading and “brushing” shall require a permit. Exceptions shall be grading of 50 cubic yards or less and “brushing” within a radius of 100 yards of a residential structure for fire purposes.	<b>Consistent.</b> All cannabis activities under the proposed Project would require permits and would be subject to development standards, as well as site-specific standards that would be applied on a case-by-case basis during Planning and Development permit review. Existing County regulations would also be applied to individual proposed cannabis sites, as applicable. As a result, the Project would be consistent with this policy.
<b>Visual Resource Policies</b>	
2. All commercial, industrial, and planned developments shall be required to submit a landscaping plan to the County for approval.	<b>Consistent.</b> The proposed Project includes development standards that require site fencing, lighting, and other controls, but the standards do not require landscaping. Cannabis activities would be reviewed on a case-by-case basis. This review may include requirements for a landscaping plan. Therefore, the Project would be consistent with this policy.
3. In areas designated as rural on the land use plan maps, the height, scale, and design of structures shall be compatible with the character of the surrounding natural environment, except where technical requirements dictate otherwise. Structures shall be subordinate in appearance to natural landforms; shall be designed to follow the natural contours of the landscape; and shall be sited so as not to intrude into the skyline as seen from public viewing places. In areas designated as urban on the land use plan maps and in designated rural neighborhoods, new	<b>Consistent.</b> All cannabis activities would be subject to development standards, as well as site-specific standards that may be required on a case-by-case basis. This review process would ensure all activities with structures proposed in rural regions are designed to be compatible with the natural environment. As a result, the Project would be consistent with this policy.

Policy Requirement	Project Consistency Analysis:
structures shall be in conformance with the scale and character of the existing community. Clustered development, varied circulation patterns, and diverse housing types shall be encouraged.	
<b>Santa Barbara County Comprehensive Plan – Agriculture Element</b>	
<p><b>GOAL I.</b> Santa Barbara County shall assure and enhance the continuation of agriculture as a major viable production industry in Santa Barbara County. Agriculture shall be encouraged. Where conditions allow, (taking into account environmental impacts) expansion and intensification shall be supported. (Supporting Policies I.A through I.F)</p>	<p><b>Consistent.</b> The proposed Project would support, encourage, and enhance the continuation of agriculture as a major viable production industry in the County. The proposed Project would also support the expansion and intensification of agriculture by designating zoning districts where cannabis cultivation and manufacturing is permitted. The proposed Project would also be consistent with the supporting policy that states the County shall recognize crop choice and agricultural management decisions given when an existing crop may be replaced by licensed cannabis activities and current agricultural practices surrounding cannabis cultivation are evolving and improving. Additionally, as part of the proposed Project, the County does recognize that cannabis cultivation activities may generate noise, odor, and dust as a known consequence of the normal agricultural practices for cannabis cultivation. As a result, the proposed Project would be consistent with this goal and its supporting policies.</p>
<p><b>GOAL II.</b> Agricultural lands shall be protected from adverse urban influence. (Supporting Policy II.B)          Santa Barbara County shall recognize, and give high priority to, the need for protection from trespass, thievery, vandalism, roaming dogs, and other similar concerns on all agricultural lands.</p>	<p><b>Consistent.</b> Cannabis cultivation has been recognized as an agricultural use that requires additional security measures related to trespass, thievery, vandalism, and crime given the existing cannabis industry has historically been an illegal activity in California, is still illegal at a federal level, and subject to law enforcement actions. The proposed Project contains zoning restrictions and development standards designed to prevent the activities associated with cannabis cultivation uses that may impact urban uses. The development standards also contain specific measures related to site fencing and security. As a result, the Project would be consistent with this goal and its supporting policy.</p>
<p><b>GOAL III.</b> Where it is necessary for agricultural lands to be converted to other uses, this use shall not interfere with remaining agricultural operations. (Supporting Policy III.B)</p>	<p><b>Consistent.</b> Cannabis cultivation has been recognized as an agricultural use that requires supporting manufacturing, testing, distribution and retail uses on commercial and industrial zoned parcels. The proposed Project permits cannabis cultivation and allows accessory uses, such as outbuildings and warehouses subject to a discretionary zone permit. The proposed Project does not limit agriculture in Urban Areas; rather the Project supports agricultural uses in both urban and rural areas. As a result, the proposed Project would be consistent with this goal and its supporting policy.</p>
<p><b>GOAL IV.</b> Recognizing that agriculture can enhance and protect natural resources, agricultural operations should be encouraged to incorporate such techniques</p>	<p><b>Consistent.</b> The proposed Cannabis Land Use Ordinance includes use restrictions and development standards; however, the County implements soil conservation and fire risk reduction practices, in addition to grading and brush clearing measures. These specific conditions may be</p>

Policy Requirement	Project Consistency Analysis:
as soil conservation and sound fire risk reduction practices. (Supporting Policies IV.A through IV.C)	applied to the project on a case-by-case basis during the discretionary and environmental review process. As a result, the Project is consistent with this goal and its supporting policies.
<b>GOAL V.</b> Santa Barbara County shall allow areas and installations for those supportive activities needed as an integral part of the production and marketing process on and/or off the farm. (Supporting Policies V.A through V.B)	<b>Consistent.</b> The proposed Cannabis Land Use Ordinance Project includes use restrictions and development standards; but these restrictions allow supporting cannabis activities that involve manufacturing, testing, distribution, and retail to occur on appropriately zoned parcels, even though these parcels may not be contiguous with the cultivation activities. There are commercial and industrial zoned parcels within the vicinity of the currently operating cultivators in the County (e.g., Carpinteria, Lompoc Valley, and Santa Ynez Valley) that could provide areas for supportive agricultural services. Therefore, the proposed Project is consistent with this goal and its supporting policies.
<b>GOAL VI:</b> The County should make effective-provision for access to agricultural areas and for the necessary movement of agricultural crops and equipment. (Supporting Policy VI.A)	<b>Consistent.</b> Supporting infrastructure may be necessary to facilitate cannabis cultivation, manufacturing, distribution, testing, and retail activities. These proposed activities would rely on and use existing County-maintained roads. The proposed Project does not conflict with this goal or its supporting policy.