

Attachment 13 – Supplemental Comprehensive Plan Policy Consistency Analysis

REQUIREMENT	DISCUSSION
<i>Conservation Element – Groundwater Resources Policies</i>	
<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 decision which would lead to the substantial over commitment of any groundwater basin.</i></p>	<p>Consistent with the Conservation Element Groundwater Resources Policies 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 Cuyama Groundwater basin. As discussed in Section C of the Board Agenda Letter prepared for the July 13, 2021 Board of Supervisors meeting, the Cuyama Groundwater Basin is defined by the California Department of Water Resources (DWR) as a critically over drafted groundwater basin (medium priority). The Sustainable Groundwater Management Act (SGMA) requires Groundwater Sustainability Agencies (GSAs) to be formed to develop and implement Groundwater Sustainability Plans (GSPs) in medium- and high-priority basins. In accordance with SGMA, the Cuyama Groundwater Basin GSA formed in 2017 and is responsible for the development and implementation of the Cuyama GSP. The Proposed Project is currently not within either of the Management Areas that are delineated in the Cuyama GSP and therefore is not subject to pumping restrictions.</p> <p>The Proposed Project includes approximately 34.7 acres of outdoor cannabis cultivation under hoop structures located in areas of the site historically used for farming and was last under crop in 2012. The projected water use for the Proposed Project is approximately 104 acre-feet per year, which the Applicant will offset 100% by providing compensation to farmers within the same groundwater basin</p>

<p><i>Groundwater Recourses Action 3.5.1: Based on input from the County Water Agency and P&D, the Board, in coordination with the responsible water purveyor(s), shall designate any basins within the county as "seriously overdrafted" if the following conditions are present: Prolonged overdraft which results or, in the reasonably foreseeable future (generally within ten years) would result, in measurable, unmitigated adverse environmental or economic impacts, either long-term or permanent. Such impacts include but are not limited to seawater intrusion, other substantial</i></p>	<p>that switch from irrigated to non-irrigated agricultural uses, and/or by funding irrigation improvements within the same groundwater basin.</p> <p>The proposed 1:1 water offset program (discussed in Section B and Attachment 8 of the Board Agenda Letter prepared for the July 13, 2021 Board of Supervisors meeting), in addition to the existing regulatory framework that the Cuyama GSP provides, adequately addresses groundwater impacts to the Cuyama Groundwater Basin. Additionally, the applicant provided a hydrogeologic evaluation and hydrologic analysis (Attachment 9 of the Board Agenda Letter prepared for the July 13, 2021 Board of Supervisors meeting) which support the 1:1 groundwater offset program and illustrate that the proposed project site and offset site are hydrogeologically connected.</p> <p>Water efficiency measures that meet the requirements of LUDC Section 35.42.075.D.1.j have been proposed as a part of the Project and include use of a drip irrigation system and use of tensiometers to monitor soil moisture and prevent over watering. These components of the Proposed Project ensure that groundwater resources will continue to be protected after implementation of the Proposed Project.</p> <p>Staff consulted with the County Water Agency and confirmed that Actions 3.5.1 and 3.5.2 would not apply as the Board of Supervisors has not designated the Cuyama Basin as “seriously overdrafted”.</p>
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quality degradation, land surface subsidence, substantial effects on riparian or other environmentally sensitive habitats, or unreasonable interference with the beneficial use of a basin's resources. The County's fundamental policy shall be to prevent such overdraft conditions.

Groundwater Resources Action 3.5.2: *In seriously overdrafted basins, the County shall not approve discretionary development permits if such development requires new net extractions or increases in net extractions of groundwater, pending development and County acceptance of a basin management plan, consistent with the Groundwater Management Act or other applicable law, which adequately addresses the serious overdraft.*