Pence Appeal, Santa Barbara West Coast Farms

Case Nos. 19APL-00000-00010 and 19LUP-00000-00064

Hearing Date: November 6, 2019

Attachment A, Findings



#### COUNTY OF SANTA BARBARA PLANNING AND DEVELOPMENT

#### **MEMORANDUM**

TO: Santa Barbara County Planning Commission (Commission)

FROM: Jeff Wilson, (805) 586-2085

Assistant Director, Planning & Development

STAFF Melanie Jackson

CONTACT: Planner, (805) 934-6253

DATE: November 6, 2019

RE: Appeal of the Santa Barbara Westcoast Farms, LLC., Land Use Permit, Case

Nos. 19APL-00000-00010 & 19LUP-00000-00064, Third Supervisorial District

On September 13, 2019, the Santa Barbara County Planning Commission took action to continue a third party appeal of the Santa Barbara Westcoast Farms, LLC., Cannabis Cultivation Land Use Permit (Case Nos. 19APL-00000-00010 & 19-LUP-00000-00064) to the November 6, 2019, Planning Commission hearing. Since the date of continuance, the project proponent has revised the proposed project's lighting plan to reduce the number of proposed security lights. In addition, the applicant has modified the number of proposed employees and the hours of operation. Finally, the proposed fence height has been reduced from eight-feet to six-feet. This memorandum sets forth an analysis of the proposed project with these revisions.

#### PROPOSED PROJECT REVISIONS

#### Lighting

As originally proposed, the Santa Barbara West Coast Farms, LLC., cannabis cultivation project included 56 motion sensor activated security lights that would be mounted on poles located around the perimeter of the proposed cultivation areas and mounted to the proposed accessory structures. Following the September 13, 2019, decision to continue the hearing for the proposed project, the applicant revised the proposed lighting plan to reduce the number of motion sensor activated security lights to 12, in order to minimize lighting impacts to neighboring properties. Per the revised plans, security lighting would be concentrated at the locations of the processing areas, accessory structures, and property entrances.

#### Number of Employees & Hours of Operation

The original project proposed included three year-round, full-time employees and up to 15 additional employees during harvest seasons. The applicant has revised the proposed project

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description to include 10 full-time employees during cultivation seasons and an additional 10-20 employees during harvest seasons.

In addition, the hours of operation for the proposed project were originally from 7:30 a.m. to 7:30 p.m., seven days a week, during the non-harvest seasons, and 5:00 a.m. to 7:00 p.m., daily, during the harvest season. The applicant has revised the proposed hours of operation from 6:00 a.m. to 3:00 p.m., year-round.

#### Fence Height

Finally, the proposed project has been revised to modify the fence height from eight-feet to six-feet.

#### REVISED PROJECT DESCRIPTION

The revised project description, including the modifications noted above, is as follows (deletions are shown in strike-through font and additions are underlined):

The proposed Land Use Permit would allow for a cannabis cultivation operation on an approximately 50-acre portion of a 73-acre parcel (Assessor's Parcel Number 099-240-067) located off Highway 246, approximately 3.3 miles from the intersection of Highway 101 and W Highway 246 in the Buellton area. The project would include approximately 40-acres of outdoor cannabis cultivation and five acres of nursery, processing, and storage areas. The processing and storage areas would be located within two-3,000 square foot agricultural accessory structures and the nursery would be located outdoors, northwest of the proposed structures. The northerly structure would be dedicated to storage and the southerly structure would include a small office, two individual restrooms, and the remainder would be dedicated to processing. An on-site well will provide irrigation to the cultivation areas.

Placement of a <u>86</u>-foot chain-link fence would be located at the perimeter of the cannabis cultivation and product manufacturing areas to provide security and partial screening. Additional screening of the project site would be provided by landscaping that would be installed on the north property line, bordering Highway 246. Additional security would be provided with the installation of <u>12 full cut-off</u>, downward facing, motion-sensor lighting and onsite security cameras. During the harvest season, operations will be monitored by 24/7 onsite security.

The operation would include three-10 full-time staff during the cultivation season and an additional 10-20 temporary employees during the harvest season. year-round employees and up to 15 additional employees during the harvest season. Harvest seasons would take place twice a year and last approximately one month each. Approximately 28 onsite parking stalls are included in the project to accommodate employees, including one ADA parking stall. During the off season, hours of operation would be 7:30 a.m. to 7:30 p.m. daily, seven days a week. During harvest season, hours of operation would be 5:00 a.m. to 7:00 p.m. daily, seven days a week. Hours of operation would be 6:00 a.m. to 3:00 p.m., year-round. Potable water would be provided via a second onsite well and sewage disposal

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would be provided by onsite, permanent restrooms and accompanying septic system, leach field and repair area.

All products would be generated, and processed onsite. Thereafter, products would be transported to licensed distributors in the San Diego area. The site would take access from Highway 246 via Highway 101. Traffic generation and vehicle trips would be reduced by implementation of a Site Transportation Demand Management Plan, that includes ridesharing incentives and compressed work schedules for employees.

## REVISED STATE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) GUIDELINES § 15168(c)(4) CHECKLIST AND § 15162 ANALYSIS

As discussed in Section 6.2 of the staff reported prepared for the August 8, 2019, Planning Commission hearing regarding the proposed project, staff prepared a checklist pursuant to § 15168(c)(4) and, by reference, § 15162 of the State CEQA Guidelines, to determine whether the proposed activity is within the scope of the project analyzed in the programmatic environmental impact report (PEIR) that the County certified for the Santa Barbara County Cannabis Land Use Ordinance and Licensing Program (Program). Staff prepared a revised checklist that analyzes the revised project description set forth above; the revised checklist is included as Attachment A to this memorandum. As discussed in the revised checklist, the proposed project as revised is within the scope of the PEIR for the Program and the effects of the proposed project falls within those examined in the PEIR. 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, and will not present new information of substantial importance pursuant to § 15162 of the State CEQA Guidelines, thereby warranting the preparation of a new environmental document for the proposed project.

## COMPREHENSIVE PLAN (INCLUDING, BUT NOT LIMITED TO, SANTA YNEZ COMMUNITY PLAN) CONSISTENCY

Sections 6.3 and 6.4 of the staff report for the Planning Commission hearing on August 8, 2019, set forth an analysis of the originally proposed project's consistency with the Comprehensive Plan (e.g., the applicable policies and development standards of the general plan elements and Santa Ynez Community Plan, as well as the applicable zoning regulations of the Land Use and Development Code). As discussed in the staff report, the originally proposed project would have been consistent with the Comprehensive Plan and the Santa Ynez Valley Community Plan, with the application of certain conditions of approval to the Land Use Permit for the originally proposed project.

The revisions to the proposed project would not change the conclusions of the Comprehensive Plan or Santa Ynez Valley Community Plan consistency analysis set forth in the August 8, 2019, Planning Commission staff report. The proposed project would be consistent with the Comprehensive Plan because adequate services, including water and sewage disposal, are available to the site. The proposed project would be consistent with the Land Use Element hillside and watershed protection policies set forth in the comprehensive plan; the proposed project site is not located on a hillside and the proposed project would comply with the Land Use and

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Development Code Section 35.42.075.D.1.d, which requires that the proposed project comply with the Cannabis Waste Discharge Requirements General Order required by the State Water Resources Control Board's Cannabis Cultivation Policy. Biological resources in or around the project site would be protected based on the findings of the biological report submitted for the proposed project and due to the degraded quality of the site from previous, historical agricultural activities.

In addition, the proposed project is consistent with the other Comprehensive Plan policies and the Santa Ynez Community Plan policies related to visual resources because the modification to the lighting plan to reduce the number of pole mounted, motion sensor activated security lights would minimize potential lighting impacts to neighboring properties. Further, the reduction in fence height of the perimeter security fencing from eight feet to six feet would minimize the visual impacts of the proposed chain link fence. The proposed 320 square foot security office would also be consistent with the visual resources policies because it would be located in an area that would be screened from view of Highway 246 by the implementation of the proposed project landscaping. Finally, Condition of Approval no. 8 requires that the project be reviewed by the Central Board of Architectural Review to ensure that the project aesthetics are consistent with surrounding area.

#### **FINDINGS**

Given the revisions to the proposed project and additional information provided in this memorandum and attached documents, staff prepared revised CEQA and administrative findings for the Planning Commission's consideration. The revised findings are set forth in Attachment A to this memorandum.

#### RECOMMENDATION AND PROCEDURES

Based on the information provided above, staff recommends that the Planning Commission follow the procedures outlined below, deny the appeal (Case No. 19APL-00000-00010) and affirm the decision of the Director to approve Case No. 19LUP-00000-00064, marked "Officially Accepted, County of Santa Barbara July 10, 2019, County Planning Commission Attachment A-J", based upon the proposed project's consistency with the Comprehensive Plan and based on the ability to make the required findings.

The Commission's motion should include the following:

- 1. Deny the appeal, Case No. 19APL-00000-00010.
- 2. Make the required findings for approval of the proposed project specified in Attachment A to this memorandum, including California Environmental Quality Act (CEQA) findings.
- 3. Determine that the previously certified PEIR (17EIR-00000-00003) is adequate and no subsequent environmental review is required pursuant to CEQA Guidelines Sections 15162 and 15168(c)(2) (Attachment Q to the staff report dated August 8, 2019, and Attachment C to this memorandum).

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4. Grant *de novo* approval of the proposed project, Case No. 19LUP-00000-00064, subject to the conditions included as Attachment B to this memorandum.

Refer back to staff if the County Planning Commission takes other than the recommended actions for appropriate findings and conditions.

#### **ATTACHMENTS**

- A. Findings
- B. Conditions of Approval
- C. Revised CEQA Checklist
- D. Revised Plans

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#### ATTACHMENT A: FINDINGS

#### 1.0 CEQA FINDINGS

# SUBSEQUENT ACTIVITIES WITHIN THE SCOPE OF THE PROGRAM ENVIRONMENTAL IMPACT REPORT (PEIR)

FINDINGS PURSUANT TO PUBLIC RESOURCES CODE SECTION 21081 AND THE CALIFORNIA ENVIRONMENTAL QUALITY ACT GUIDELINES SECTIONS 15162 AND 15168:

#### 1.1 CONSIDERATION OF THE SUBSEQUENT ACTIVITIES IN THE PROGRAM

The County Planning Commission considered the previously certified PEIR for the Cannabis Land Use Ordinance and Licensing Program, 17EIR-00000-00003 (Attachment C to the memorandum, dated November 6, 2019, and incorporated herein by reference), along with the proposed project which is an activity within the scope of the PEIR. Staff prepared a written checklist in compliance with State CEQA Guidelines Section 15168(c)(4) to document the evaluation of the site and the activity to determine that the environmental effects of the operation are covered in the PEIR (Attachment C to this memorandum dated November 6, 2019, and incorporated herein by reference). As shown in the written checklist, the proposed project is within the scope of the PEIR and the effects of the proposed project were examined in the PEIR. Therefore, on the basis of the whole record, including the written checklist, the previously certified PEIR, and any public comments received, the Planning Commission finds 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, and will not present new information of substantial importance pursuant to State CEQA Guidelines Section 15162, thereby warranting the preparation of a new environmental document for the proposed project.

#### 1.2 LOCATION OF DOCUMENTS

The documents and other materials which constitute the record of proceedings upon which this decision is based are in the custody of the Planning and Development Department located at 123 East Anapamu Street, Santa Barbara, CA 93101.

#### 2.0 ADMINISTRATIVE FINDINGS

#### 2.1 LAND USE PERMIT FINDINGS

2.1.1 Finding required for all Land Use Permits. In compliance with Section 35.30.100.A of the County Land Use and Development Code, prior to the approval or conditional approval of an application for a Land Use Permit the review authority shall first find,

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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.

As discussed in the staff report, dated August 8, 2019, and the memorandum, dated November 6, 2019, incorporated herein by reference, adequate public and private services are in place to serve the proposed project. The subject property is served by an existing agricultural well that has historically been used for crop irrigation. The applicant will use the existing well to serve both agricultural and domestic water purposes, which will require review and approval by the Public Health Department, Environmental Health Services. Sanitary facilities for employees will be provided by a new restroom and new onsite wastewater treatment system, and portable chemical toilets with hand-washing stations during harvest seasons. The proposed onsite wastewater system will require review and approval by the Public Health Department, Environmental Health Services. The subject parcel will continue to be served by the Santa Barbara County Fire Department for fire protection services and by the Santa Barbara County Sheriff for public safety. Ingress and egress to the parcel would continue to be provided off of West Highway 246. Therefore, this finding can be made.

2.1.2 Findings required for all Land Use Permits. In compliance with Subsection 35.82.110.E.1 of the County Land Use and Development Code, prior to the approval or conditional approval of an application for a Land Use Permit the review authority shall first make all of the following findings:

#### 1. The proposed development conforms:

- a. To the applicable provisions of the Comprehensive Plan, including any applicable community or area plan.
- b. With the applicable provisions of this Development Code or falls within the limited exception allowed in compliance with Chapter 35.101 (Nonconforming Uses, Structures, and Lots).

As discussed in the staff report dated August 8, 2019, and the memorandum, dated November 6, 2019, incorporated herein by reference, the development conforms to the applicable policies and development standards of the Comprehensive Plan including, but not limited to, the Santa Ynez Valley Community Plan. The proposed development is consistent with the Land Use and Development Code requirements for the AG-II-100 zone district as they relate to permitted uses, building heights, setbacks and parking, as well as all othe applicable regulations of the Land Use and Development Code. Therefore, this finding can be made.

#### 2. The proposed development is located on a legally created lot.

The subject property is a legal lot that is shown as Tract 18 of the Rancho san Carlos De Jonata in the County of Santa Barbara, State of California, according to the map entitled "Map of survey made by Flournoy of a part of the Rancho San Carlos De Jonata for Santa

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Ynez Valley Development Company, Santa Barbara County California, February 1910" recorded on April 8, 1919, in Book 5, Page 55 of Maps and Surveys, in the Office of the County Recorder of said County.

3. The subject property complies with all laws, regulations, and rules pertaining to uses, subdivisions, setbacks and any other applicable provisions of this Development Code, and any applicable zoning violation enforcement fees and processing fees have been paid. This Subsection shall not be interpreted to impose new requirements on legal nonconforming uses and structures in compliance with Chapter 35.101 (Nonconforming Uses, Structures, and Lots).

As conditioned, the subject property is, and the proposed project will be, in full compliance with all laws, rules and regulations pertaining to zoning uses, subdivisions, setbacks and all other applicable provisions of the Land Use and Development Code, for the AG-II zone district. Additionally, all processing fees have been paid to date.

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Attachment B, Conditions of Approval

#### **ATTACHMENT B: CONDITIONS OF APPROVAL**

# CONDITIONS OF APPROVAL SANTA BARBARA WEST COAST FARMS CANNABIS CULTIVATION LAND USE PERMIT

CASE NO. 19LUP-00000-00064 APN: 099-240-067

#### **Project Description**

1. **Proj Des-01 Project Description**. This Land Use Permit is based upon and limited to compliance with the project description, and all conditions of approval set forth below, including mitigation measures and specified plans and agreements included by reference, as well as all applicable County rules and regulations. The project description is as follows:

The proposed Land Use Permit will allow for a cannabis cultivation operation on an approximately 50-acre portion of a 73-acre parcel (Assessor's Parcel Number 099-240-067) located off Highway 246, approximately 3.3 miles from the intersection of Highway 101 and W Highway 246 in the Buellton area. The project will include approximately 40-acres of outdoor cannabis cultivation and five acres of nursery, processing, and storage areas. The processing and storage areas will be located within two-3,000 square foot agricultural accessory structures and the nursery will be located outdoors, northwest of the proposed structures. The northerly structure will be dedicated to storage and the southerly structure will include a small office, two individual restrooms, and the remainder will be dedicated to processing. An on-site well will provide irrigation to the cultivation areas.

Placement of a 6-foot chain-link fence will be located at the perimeter of the cannabis cultivation and product manufacturing areas to provide security and partial screening. Additional screening of the project site will be provided by landscaping that will be installed on the north property line, bordering Highway 246. Additional security will be provided with the installation of 12 full cut-off, downward facing, motion-sensor lighting and onsite security cameras. During the harvest season, operations will be monitored by 24/7 onsite security.

The operation will include 10 full-time staff during the cultivation season and an additional 10-20 temporary employees during the harvest season. Harvest seasons will take place twice a year and last approximately one month each. Approximately 28 onsite parking stalls are included in the project to accommodate employees, including one ADA parking stall. Hours of operation will be 6:00 a.m. to 3:00 p.m., year-round. Potable water will be provided via a second onsite well and sewage disposal willbe provided by onsite, permanent restrooms and accompanying septic system, leach field and repair area.

All products will be generated, and processed onsite. Thereafter, products will be transported to licensed distributors in the San Diego area. The site will take access from Highway 246 via Highway 101. Traffic generation and vehicle trips will be reduced by

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implementation of a Site Transportation Demand Management Plan, that includes ridesharing incentives and compressed work schedules for employees.

This Land Use Permit is limited to compliance with the approved project description, approved project plans dated October 25, 2019 and all conditions of approval set forth herein and all applicable provisions of Santa Barbara County zoning and land use regulations, compliance with County, State and local cannabis licensing requirements and compliance with all applicable state laws.

Any deviations from the project description, exhibits, or conditions of approval must be reviewed and approved by Santa Barbara County for conformity with the project as approved. Said deviations may be subject to additional requirements, including but not limited to permit modification and/or environmental review. Deviations without the above described approval will constitute a violation of the subject permit.

#### **Project Specific Conditions**

- 2. Licenses Required. The applicant shall obtain and maintain in good status: (1) a valid County business license as required by the County Code Chapter 50, and (2) a valid State cannabis license as required by the California Business and Professions Code for the cannabis activities that are the subject of this permit.
- 3. Transfer of Ownership. In the event that the applicant transfers interest in the commercial cannabis operation, the successor(s) in interest shall assume all responsibilities concerning the project including, but not limited to, maintaining compliance with the conditions of this permit and paying for P&D condition compliance activities throughout the life of the project.

**DOCUMENTATION:** The successor(s) in interest shall notify P&D compliance staff, in writing, of the transfer in interest, and provide the contact and billing information of the successor(s) in interest.

**TIMING:** The successor(s) in interest shall provide the written notification within 30 days following the transfer in interest.

**MONITORING:** P&D compliance staff reviews the written notification to confirm that all requisite information has been included pursuant to the requirements of this condition.

**4. Records.** The applicant shall maintain clear and adequate records and documentation, in accordance with State law, the California Cannabis Track-and-Trace System, and as required by County Code Chapter 35, demonstrating that all cannabis or cannabis products have been obtained from, and are provided to, other permitted and licensed cannabis operations.

**TIMING:** The applicant shall maintain the documentation for a minimum of five years following the preparation and/or approval of the documentation.

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**MONITORING:** The applicant shall provide the documentation for review, inspection, examination and audit by the Department.

**5. Fencing and Security Plan.** The applicant shall implement the Fencing and Security Plan stamped "Zoning Approved," dated 10/25/2019.

**PLAN REQUIREMENTS**: The Fencing and Security Plan must comply with the requirements of the Land Use and Development Code (§ 35.42.075.C.2).

**TIMING:** The applicant shall implement the Fencing and Security Plan prior to commencement of the cannabis activities that are the subject of this permit. The applicant shall maintain the project site in compliance with the Fencing and Security Plan throughout the life of the project.

**MONITORING:** P&D compliance staff inspects the project site to confirm that all components of the Fencing and Security Plan are installed and maintained pursuant to the requirements of this condition.

**6.** Landscape and Screening Plan. The applicant shall implement the Landscape and Screening Plan stamped "Zoning Approved," dated 10/25/19.

**PLAN REQUIREMENTS**: The Landscape and Screening Plan must comply with the requirements of the Land Use and Development Code (§ 35.42.075.C.3). The applicant shall file a performance security in an amount sufficient to ensure the installation and maintenance of the landscaping for two years, as determined by a landscape architect and approved by P&D compliance staff.

**TIMING**: The applicant shall submit one copy of the approved Landscaping and Screening Plan to P&D staff and deposit the performance security prior to issuance of this permit. The applicant shall install all components of the Landscaping and Screening Plan prior to commencement of the cannabis activities that are the subject of this permit. The applicant shall maintain the landscaping and screening in compliance with the Landscape and Screening Plan throughout the life of the project.

MONITORING: P&D compliance staff inspects the project site to confirm that all components of the Landscape and Screening Plan are installed and maintained pursuant to the requirements of this condition. P&D compliance staff releases said performance security upon a written statement from P&D that the landscaping, in accordance with the approved Landscape Plan and Screening Plan, has been installed and maintained for two years.

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7. **Lighting Plan.** The applicant shall implement the Lighting Plan stamped "Zoning Approved," dated October 25, 2019.

**PLAN REQUIREMENTS**: The Lighting Plan must comply with the requirements of the Land Use and Development Code (§ 35.42.075.C.4).

**TIMING:** All components of the Lighting Plan shall be implemented prior to final building inspection. The applicant shall maintain the project site in compliance with the Lighting Plan throughout the life of the project.

**MONITORING:** P&D compliance staff inspects the project site to confirm that all components of the Lighting Plan are installed, maintained, and operated, pursuant to the requirements of this condition.

**8. BAR Required**. The applicant shall obtain Board of Architectural Review (BAR) approval for accessory structures, lighting, landscaping, and any other features that warrant BAR review and approval. All project elements (e.g., design, scale, character, colors and materials) shall be compatible with vicinity development and shall conform in all respects to the approved project plans dated October 25, 2019.

**TIMING**: The applicant shall submit architectural drawings of all structures for review and shall obtain final BAR approval prior to issuance of this Land Use Permit. Grading plans, if required, shall be submitted to P&D concurrent with or prior to BAR plan filing.

**MONITORING**: The applicant shall demonstrate to P&D compliance monitoring staff that the project has been constructed in conformance with approved BAR design prior to Final Building Inspection Clearance or installation of the feature that is subject to BAR design review (e.g., landscaping and lighting).

**8. Noise.** Noise resulting from cannabis activities shall not exceed 65 dB (Day-Night Average Sound Level) as measured at the property line of the lot on which the project site is located.

**PLAN REQUIREMENTS:** The applicant shall submit building plans that illustrate the proposed construction techniques and materials to be used in the agricultural accessory structure.

**MONITORING:** P&D compliance staff inspects the project site to confirm that all noise producing cannabis activities do not exceed 65 decibels at the property line.

9. Odor Abatement Plan. The applicant submitted an Odor Abatement Plan, dated July 29, 2019, which includes the use of a vapor phase system. The Applicant shall retain a professional engineer or certified industrial hygienist to prepare and submit a written analysis of the efficacy of the proposed Odor Abatement Plan. If it is found that the Odor Abatement Plan must be modified to meet the requirements of the Santa Ynez Valley Community Plan DevStd LUG-

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SYV-8.11 (e.g., by installing an additional vapor phase system), the Applicant shall submit a revised Odor Abatement Plan that sets forth the modifications to the Odor Abatement Plan.

**PLAN REQUIREMENTS:** The Odor Abatement Plan must comply with the requirements of the Santa Ynez Valley Community Plan DevStd LUG-SYV-8.11.

**TIMING:** The applicant shall: (1) submit the written analysis of the efficacy of the proposed Odor Abatement Plan, prior to issuance of this Land Use Permit; and (2) implement the Odor Abatement Plan prior to issuance of final building and/or grading inspection and/or throughout operation of the project as applicable. The applicant shall maintain the project site in compliance with the Odor Abatement Plan throughout the life of the project.

**MONITORING:** P&D compliance staff inspects the project site to confirm that all components of the Odor Abatement Plan are installed, operated, and maintained, pursuant to the requirements of this condition. Upon installation of the odor control system and quarterly thereafter for one year, Permit Compliance staff will conduct an inspection of the odor control system to assess its compliance with the Santa Ynez Valley Community Plan DevStd LUG-SYV-8.11. As part of each inspection, the County will retain a professional engineer or certified industrial hygienist, at the applicant's expense, to certify that the odor control system meets the requirements of this condition and the Santa Ynez Valley Community Plan DevStd LUG-SYV-8.11.

**10. Site Transportation Demand Management Plan.** The applicant shall implement the Site Transportation Demand Management Plan stamped "Zoning Approved," dated October 25, 2019.

**PLAN REQUIREMENTS:** The Site Transportation Demand Management Plan must comply with the requirements of the Land Use and Development Code (§ 35.42.075.D.1.j).

**TIMING:** The applicant shall implement the Site Transportation Demand Management Plan prior to the issuance of final building and/or grading inspection. The applicant shall maintain the project site in compliance with the Site Transportation Demand Management Plan throughout the life of the project.

**MONITORING**: The applicant shall demonstrate to P&D compliance staff (e.g., by providing a copy of an executed contract with a rideshare service or site inspections to verify that trip reduction features are installed onsite) that all components of the approved Site Transportation Demand Management Plan are implemented.

11. Cannabis Waste Discharge Requirements. The applicant shall demonstrate compliance with the State Water Resources Control Board's comprehensive Cannabis Cultivation Policy that includes principles and guidelines for cannabis cultivation, including regulations on the use of pesticides, rodenticides, herbicides, insecticides, fungicides, disinfectants, and fertilizers.

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12. **Minimum Cultivation Requirements.** A minimum of 10% of the cannabis product distributed from the project site shall be sourced from cannabis plant material cultivated on the same lot on which the distribution activities will occur.

**DOCUMENTATION:** The applicant shall participate in the California Cannabis Track-and-Trace System and prepare documentation from the California Cannabis Track-and-Trace System that identifies the source of cannabis products that are distributed from the lot on which the distribution activities will occur.

**TIMING:** Within three business days of a request from P&D compliance staff, the applicant shall provide the California Cannabis Track-and-Trace System records that identify the source of cannabis products that are distributed from the lot on which the distribution activities will occur. Pursuant to Condition No. 4 of this permit, the applicant shall maintain the records for a minimum of five years following the date of preparation of the records.

**MONITORING:** P&D compliance staff inspects the California Cannabis Track-and-Trace System records to confirm that the cannabis products are sourced from appropriate locations pursuant to the requirements of this condition.

- **13.** Utilities. Utilities, including television, shall be placed underground in new developments in accordance with the rules and regulations of the California Public Utilities Commission, except where cost of undergrounding would be so high as to deny service.
- **14. Onsite Wastewater Treatment System (OWTS).** The applicant shall install and use an OWTS that serves the restroom facilities to be located within one of the agricultural accessory structures.

**DOCUMENTATION:** The applicant shall submit: an "OWTS Permit Application(s) – New Systems" to the Public Health Department, Environmental Health Services (EHS) for review and approval.

**TIMING:** Prior to issuance of this Land Use Permit, the applicant shall submit the revised site plan to P&D. Prior to issuance of the building permit for the accessory structure with the restroom facilities, the applicant shall submit the "OWTS Permit Application(s) – New Systems" to EHS for review and approval.

**MONITORING:** P&D reviews the site plan, plans for the restroom facilities, and OWTS to confirm that it complies with any and all applicable zoning and building codes requirements that apply to the installation and use of the OWTS. In addition, EHS reviews the permit application and conducts field inspections to verify that the OWTS complies with any and all applicable EHS requirements.

**15. Single Parcel Water System.** The applicant shall obtain approval from EHS for the use of an existing agricultural water, as part of a Single Parcel Water System to provide domestic (potable) water for employees of the cannabis activities.

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**DOCUMENTATION:** The applicant shall submit any and all materials and information that EHS requires in order to review the proposed Single Parcel Water System for compliance with any requirements enforced by EHS for the Single Parcel Water System.

**TIMING:** Prior to issuance of the County cannabis business license that is required for the proposed cannabis activities, the applicant shall submit the required materials and information for EHS' review and approval.

**MONITORING:** EHS reviews the material and information regarding the proposed Single Parcel Water System, and may conduct field inspections to verify that the Single Parcel Water System complies with any and all applicable EHS requirements.

#### **County Rules and Regulations**

- 16. Rules-03 Additional Permits Required: The use and/or construction of any structures or improvements authorized by this approval shall not commence until all necessary planning and building permits are obtained. Before any permit is issued by P&D, the Applicant must obtain written clearance from all departments having conditions. Such clearance shall indicate that the Applicant has satisfied all pre-construction conditions. A form for such clearance is available from Planning and Development.
- 17. Rules-05 Acceptance of Conditions: The Applicant's acceptance of this permit and/or commencement of use, construction, and/or operations under this permit shall be deemed acceptance of all conditions of this permit by the Applicant.
- **18.** Rules-22 Leased Facilities: The Operator and Owner are responsible for complying with all of the conditions of approval contained in this Land Use Permit. Any zoning violations concerning the installation, operation, and/or abandonment of the facility are the responsibility of the Owner and the Operator.
- 19. Rules-23 Processing Fees Required. Prior to issuance of Coastal Development Permit, the Applicant shall pay all applicable P&D permit processing fees in full as required by County ordinances and resolutions.
- **20. Rules-30 Plan Requirements.** The Applicant shall ensure all applicable final conditions of approval are printed in their entirety on applicable pages of grading/construction or building plans submitted to P&D. These shall be graphically illustrated where feasible.
- 21. Rules-33 Indemnity and Separation. The Applicant shall defend, indemnify and hold harmless the County or its agents or officers and employees from any claim, action, or proceeding against the County or its agents, officers, or employees, to attack, set aside, void, or annul, in whole or in part, the County's approval of this project. In the event that the County fails promptly to notify the Owner / Applicant of any such claim, action or proceeding, or that the County fails to cooperate fully in the defense of said claim, this

Pence Appeal - Santa Barbara West Coast Farms Land Use Permit Case Nos. 19APL-00000-00010, 19LUP-00000-00064 November 6, 2019 Attachment B, Conditions of Approval

condition shall thereafter be of no further force or effect.

22. Rules-37 Time Extensions-All Projects. The Applicant may request a time extension prior to the expiration of the permit or entitlement for development. The review authority with jurisdiction over the project may grant a time extension in compliance with County rules and regulations, for good cause, which include evidence of changed circumstances and ensuring compliance with CEQA. If the Applicant requests a time extension, the permit may be revised to include updated or additional conditions of approval and/or revised or additional mitigation measures, reflecting changed circumstances and/or additional project impacts.

#### Villalobos, David

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Pamela Matovelle <pamela.matovelle@gmail.com>

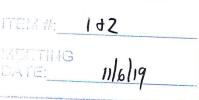
Sent:

Friday, August 9, 2019 3:29 PM

To: Subject: Villalobos, David Cannabis cultivation

Categories:

**Purple Category** 



Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To whom it may concern:

As a resident of Buellton, living approximately a quarter a mile from this proposed grow site, I have significant concerns and ask you to reject any proposal to grow marijuana at these locations.

The businessmen proposing such a venture are not from this area, (La Jolla, Ventura, Arroyo Grande) and are coming in to profit at the expense of Buellton citizens. The proposed grow area is close to elementary schools and small family homes and businesses. A grow operation that will produce noxious odors for miles, as well as THE NEED FOR ARMED GUARDS is highly inappropriate at this location.

There are many back hills locations in this county, many miles away from residences, town centers and schools that are a much better fit for such an operation. The decrease in property values if this occurs affects not only our homeowners, but tax collections as well. The impact on hotels and tourism if there is the state's largest marijuana grow and armed guards so close will be devastating for this community's economy as well as for county real estate and occupancy tax collections.

Please make sure this grow is relocated to a more suitable area.

Pamela S Matovelle

RECEIVED

AUG 09 2019

S.B. COUNTY
PLANNING & DEVELOPMENT
HEARING SUPPORT

#### Villalobos, David

From:

Cori Lassahn < corilassahn@gmail.com>

Sent:

Friday, August 9, 2019 1:22 PM

To:

Villalobos, David

Subject:

Buellton Grow Sites⊘

**Categories:** 

Purple Category

HELL#: 1+Z

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Hello,

As a resident of Buellton, I live close to this proposed grow site.

I have significant concerns and ask you to reject any proposal to grow marijuana at these locations.

The businessmen proposing such a venture are not from this area, (La Jolla, Ventura, Arroyo Grande) and are coming in to profit at the expense of Buellton citizens.

The proposed grow area is close to elementary schools and small family homes and businesses. A grow operation that will produce noxious odors for miles, as well as THE NEED FOR ARMED GUARDS is highly inappropriate at this location.

The decrease in property values if this occurs affects not only our homeowners, but tax collections as well. The impact on hotels and tourism if there is the state's largest marijuana grow and armed guards so close will be devastating for this community's economy as well as for county real estate and occupancy tax collections.

Please make sure this grow is relocated to a more suitable area.

RECEIVED

Best, The Lassahn Family 210 Valley Station Circle

AUG 09 2019

Cori Lassahn

S.B. COUNTY PLANNING & DEVELOPMENT HEARING SUPPORT

Text/Call: 805 259 8559

#### Villalobos, David

From:

Leanna Moore Watson <leanna.m.watson@gmail.com>

Sent:

Friday, August 9, 2019 12:14 PM

To:

Villalobos, David

Subject:

Buellton Marijuana Grow

**Categories:** 

**Purple Category** 

. .

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To whom it may concern:

As a resident of Buellton, living approximately a quarter a mile from this proposed grow site, I have significant concerns and ask you to reject any proposal to grow marijuana at these locations.

The businessmen proposing such a venture are not from this area, (La Jolla, Ventura, Arroyo Grande) and are coming in to profit at the expense of Buellton citizens. The proposed grow area is close to elementary schools and small family homes and businesses. A grow operation that will produce noxious odors for miles, as well as THE NEED FOR ARMED GUARDS is highly inappropriate at this location.

There are many back hills locations in this county, many miles away from residences, town centers and schools that are a much better fit for such an operation. The decrease in property values if this occurs affects not only our homeowners, but tax collections as well. The impact on hotels and tourism if there is the state's largest marijuana grow and armed guards so close will be devastating for this community's economy as well as for county real estate and occupancy tax collections.

Please make sure this grow is relocated to a more suitable area.

Leanna Moore Watson

RECEIVED

AUG 09 2019

S.B. COUNTY
PLANNING & DEVELOPMENT
HEARING SUPPORT

# From: rey830 . <rey830@gmail.com> Sent: Friday, August 9, 2019 8:58 AM To: Villalobos, David Subject: Public comment ref: Marijuana cultivation

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

**Purple Category** 

Categories:

My name is Jonathan Reyes, resident and business owner in Buellton. I am writing to submit my opposition to any marijuana cultivation in our area. Marijuana cultivation has proven to lead to environmental impact, nuisance odors, and wildlife disturbance. I and many other families in this community are against this. Thank you

RECEIVED

AUG 09 2019

S.B. COUNTY
PLANNING & DEVELOPMENT
HEARING SUPPORT

# State CEQA Guidelines § 15168(c)(4) Checklist for Commercial Cannabis Land Use Entitlement and Licensing Applications

#### A. Purpose

On February 6, 2018, the Santa Barbara County Board of Supervisors certified a programmatic environmental impact report (PEIR) that analyzed the environmental impacts of the Cannabis Land Use Ordinance and Licensing Program (Program). The PEIR was prepared in accordance with the State CEQA Guidelines (§ 15168) and evaluated the 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 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 Program.

The following checklist was prepared pursuant to the State CEQA Guidelines (§ 15168(c)(4)) to document the evaluation of the sites and activities that are the subject of land use entitlement and business licensing applications for commercial cannabis operations authorized under the Program, in order to determine whether the environmental effects of proposed commercial cannabis operations are within the scope of the PEIR.

#### B. Project Description

Please provide the following project information.

- 1. Land Use Entitlement Case Number(s): <u>19APL-00000-00010, 19LUP-00000-00064, 19BAR-00000-00195</u>
- 2. Business Licensing Ordinance Case Number(s):

State CEQA Guidelines § 15168(c)(4) Checklist for Commercial Cannabis Land Use Entitlement and Licensing Applications
Page 2

- 3. Project Applicant(s): Scott Rudolf
- 4. Property Owner(s): Scott Rudolf
- 5. Project Site Location and Tax Assessor Parcel Number(s): <u>099-240-067</u>, <u>West Highway 246</u>, <u>approximately 3.3 miles from the intersection of Highway 101 and W Highway 246 in the Buellton area.</u>

#### 6. Project Description:

This Land Use Permit is based upon and limited to compliance with the project description, and all conditions of approval set forth below, including mitigation measures and specified plans and agreements included by reference, as well as all applicable County rules and regulations. The project description is as follows:

The proposed Land Use Permit will allow for a cannabis cultivation operation on an approximately 50-acre portion of a 73-acre parcel (Assessor's Parcel Number 099-240-067) located off Highway 246, approximately 3.3 miles from the intersection of Highway 101 and W Highway 246 in the Buellton area. The project will include approximately 40-acres of outdoor cannabis cultivation and five acres of nursery, processing, and storage areas. The processing and storage areas will be located within two-3,000 square foot agricultural accessory structures and the nursery will be located outdoors, northwest of the proposed structures. The northerly structure will be dedicated to storage and the southerly structure will include a small office, two individual restrooms, and the remainder will be dedicated to processing. An on-site well will provide irrigation to the cultivation areas.

Placement of a 6-foot chain-link fence will be located at the perimeter of the cannabis cultivation and product manufacturing areas to provide security and partial screening. Additional screening of the project site will be provided by landscaping that will be installed on the north property line, bordering Highway 246. Additional security will be provided with the installation of 12 full cut-off, downward facing, motion-sensor lighting and onsite security cameras. During the harvest season, operations will be monitored by 24/7 onsite security.

The operation will include 10 full-time staff during the cultivation season and an additional 10-20 temporary employees during the harvest season. Harvest seasons will take place twice a year and last approximately one month each. Approximately 28 onsite parking stalls are included in the project to accommodate employees, including one ADA parking stall. Hours of operation will be 6:00 a.m. to 3:00 p.m., year-round. Potable water will be provided via a second onsite well and sewage disposal will be provided by onsite, permanent restrooms and accompanying septic system, leach field and repair area.

All products will be generated, and processed onsite. Thereafter, products will be transported to licensed distributors in the San Diego area. The site will take access from Highway 246 via Highway 101. Traffic generation and vehicle trips will be reduced by implementation of a Site Transportation Demand Management Plan, that includes ridesharing incentives and compressed work schedules for employees.

This Land Use Permit is limited to compliance with the approved project description, approved project plans dated October 25, 2019 and all conditions of approval set forth herein and all applicable provisions of Santa Barbara County zoning and land use regulations, compliance with County, State and local cannabis licensing requirements and compliance with all applicable state laws.

#### C. PEIR Mitigation Measures/Requirements for Commercial Cannabis Operations

The following table lists the specific mitigation measures set forth in the PEIR and questions to determine if the proposed commercial cannabis operation requires the preparation of a subsequent environmental impact report or negative declaration. Please answer all questions set forth in the following table; Planning and Development Department (P&D) staff complete § C.1 and County Executive Office (CEO) staff complete § C.2. If a question does not apply to the proposed cannabis operation, please check the corresponding "N/A" box.

#### C.1 Mitigation Measures/Requirements for P&D Staff Review

Mitigation Measure/Requirement	Code/Plan Sections*	Requirement	
Aesthetics and Visual R	esources		
MM AV-1. Screening Requirements	LUDC § 35.42.075.C.3	Is the proposed cannabis operation visible from public viewing location?  x Yes □ No	
	Article II § 35-144U.C.3	If so, does the proposed project include implementation of the required landscape and screening plan?  x Yes □ No □ N/A	
Agricultural Resources			
MM AG-1. Cannabis Cultivation Prerequisite Ancillary Use Licenses	LUDC §§ 35.42.075.D.3 and -4	Does the proposed project include ancillary cannabis uses (e.g., manufacturing of cannabis products)? x Yes □ No	
	Article II § 35-144U.C.2.a and -3.a	If the proposed project includes ancillary cannabis uses, does the proposed project comply with the minimum cultivation requirements to allow ancillary cannabis uses?  x Yes \( \subseteq \text{No} \subseteq \text{N/A} \)	

Mitigation Measure/Requirement	Code/Plan Sections*	Requirement
MM AG-2. New Structure Avoidance of Prime Soils	LUDC § 35.42.075.D.1.b	Does the proposed project site have prime soils located on it? x Yes □ No
Time Sons	Article II § 35-144U.C.1.b	Does the proposed project involve structural development? x Yes □ No  If the proposed project involves structural development, are the structures sited and designed to avoid prime soils? x Yes □ No □ N/A
Air Quality and Greenh	ouse Gas Emissions	
MM AQ-3. Cannabis Site Transportation	LUDC § 35.42.075.D.1.j	Does the proposed project include cannabis cultivation? x Yes □ No
Demand Management	Article II § 35-144U.1.j	If so, does the project include implementation of the required Transportation Demand Management Plan? x Yes □ No □ N/A
MM AQ-5. Odor Abatement Plan	LUDC § 35.42.075.C.6	This mitigation measure/requirement does not apply to projects in the AG-II zone, unless a Conditional Use Permit is required for the
	Article II § 35-144U.C.6	proposed commercial cannabis operation.  Does the proposed project include cannabis cultivation, a nursery, manufacturing, microbusiness, and/or distribution?  ☐ Yes ☐ No x N/A  If so, does the project include implementation of the required odor abatement plan? ☐ Yes ☐ No x N/A
Biological Resources		
MM BIO-1a. Tree Protection Plan	LUDC § 35.42.075.C.8 and Appendix J	Does the proposed project involve development within proximity to, alteration of, or the removal of, a native tree? ☐ Yes x No
	Article II § 35-144.C.8 and Appendix G	If so, does the project include implementation of the required tree protection plan? $\square$ Yes $\square$ No x N/A
MM BIO-1b. Habitat Protection Plan	LUDC § 35.42.075.C.8 and Appendix J	Inland. Will the project result in the removal of native vegetation or other vegetation in an area that has been identified as having a medium to high potential of being occupied by a special-status wildlife species, nesting bird, or a Federal or Statelisted special-status plant species?  ☐ Yes x No ☐ N/A
		If so, does the project include implementation of the required habitat protection plan?  ☐ Yes ☐ No x N/A

Mitigation Measure/Requirement	Code/Plan Sections*	Requirement
	Article II § 35-144.C.8 and Appendix G	Coastal. Does the project involve development within environmentally sensitive habitat (ESH) and/or ESH buffers? ☐ Yes ☐ No x N/A  If so, does the project include implementation of the required habitat protection plan? ☐ Yes ☐ No x N/A
MM HWR-1a. Cannabis Waste Discharge	LUDC § 35.42.075.D.1.d	Does the proposed project involve cannabis cultivation? x Yes □ No
Requirements Draft General Order	Article II § 35-144U.C.1.d	If so, did the applicant submit documentation from the State Water Resources Control Board demonstrating compliance with the comprehensive Cannabis Cultivation Policy? x Yes \(\Boxed{D}\) No \(\Dag{D}\) N/A
MM BIO-3. Wildlife Movement Plan	LUDC § 35.42.075.C.8 and Appendix J	Is the proposed project site located in or near a wildlife movement area? ☐ Yes x No
	Article II § 35-144.C.8 and Appendix G	If so, does the project include implementation of the required wildlife movement plan?  ☐ Yes ☐ No x N/A
Cultural Resources		
MM CR-1. Preservation	LUDC § 35.42.075.C.1	Does the proposed project involve development within an area that has the potential for cultural resources to be located within it? x Yes □ No
MM CR-2. Archaeological and Paleontological Surveys		If so, was a Phase I cultural study prepared? x Yes □ No □ N/A
	Article II §§ 35-144U.C.1 and 35-65	If so, did the Phase I cultural study require a Phase II cultural study?  ☐ Yes x No ☐ N/A
		If so, does the project involve implementation of cultural resource preservation measures set forth in the Phase II cultural study? ☐ Yes ☐ No x N/A
Hazards and Hazardous	Materials	
MM HAZ-3. Volatile Manufacturing Employee Training Plan	LUDC § 35.42.075.D.4.c	Does the proposed project involve volatile manufacturing of cannabis products?  ☐ Yes x No
	Article II § 35-144U.C.3.c	If so, does the project involve implementation of the required Volatile Manufacturing Employee Training Plan? $\square$ Yes $\square$ No x N/A
Hydrology and Water Q	Quality Impacts	
MM HWR-1. Cannabis Waste Discharge	See the Biological Resou	rces items, above.

Mitigation Measure/Requirement	Code/Plan Sections*	Requirement
Requirements General		
Order		
MM BIO-1b. Cannabis	See the Biological Resoi	ırces items, above.
Waste Discharge		
Requirements General		
Order		
Land Use Impacts		
MM LU-1. Public	LUDC	Does the proposed project involve cannabis
Lands Restriction	§ 35.42.075.D.1.h	cultivation on public lands?   Yes x No
	Article II	
	§ 35-144U.C.1.h	
MM AQ-3. Cannabis		 Greenhouse Gas Emissions items, above.
Site Transportation	See the Air Quanty and \	Treenhouse das Emissions tiems, above.
1		
Demand Management MM AQ-5. Odor	San the Air Oreality and	Cuanhanna Can Emissions Hama allama
MM AQ-5. Odor Abatement Plan	See the Air Quality and (	Greenhouse Gas Emissions items, above.
MM TRA-1. Payment		In the muonesed muoiest subject to the security
of Transportation		Is the proposed project subject to the countywide,
	Carreta Ondinana	Goleta, or Orcutt development impact fee ordinance? ☐ Yes x No
Impact Fees	County Ordinance No. 4270	ordinance? Li Yes X No
	10.4270	If so, did the applicant new the requisite for?
		If so, did the applicant pay the requisite fee?  ☐ Yes ☐ No x N/A
Compliance with		All cannabis applications. Does the proposed
Comprehensive Plan		project comply with all applicable environmental
Environmental	LUDC § 35.10.020.B	resource protection policies set forth in the
Resource Protection	LODE § 33.10.020.B	Comprehensive Plan?
Policies		x Yes $\square$ No
Toncies		Coastal cannabis applications. Does the proposed
	CLUP Chapter 3, § 3.1	project comply with all applicable coastal resources
	and Policy 1-4	protection policies set forth in the Coastal Land Use
	and roney 1-4	Plan?  Yes  No x N/A
Noise	1	1 mm 105 - 110 A 14//1
MM AQ-3. Cannabis	See the Air Quality and I	Greenhouse Gas Emissions items, above.
Site Transportation	See me mi Quany ana	Sicernouse Gus Emissions nems, acove.
Demand Management		
Transportation and Tra	ffic	
MM AQ-3. Cannabis		Greenhouse Gas Emissions items, above.
Site Transportation	See the Air Quality und	STECHNOUSE Gas Linussions hems, above.
Demand Management		
MM TRA-1. Payment	See the Land Use Impact	's items ahove
of Transportation	все те шта озе тпраст	s uems, avove.
Impact Fees		
	aractaristics and Davida	nment Activities
Unusual Project Site Characteristics and Development Activities		
Activities and Impacts within the Scope of the	State CEQA Guidelines	Does the proposed project involve a project site with sensitive or unusual environmental
Program/PEIR	§ 15168(c)(1)	characteristics, or require unusual development
1 10gram/1 DIK	8 12100(0)(1)	activities, which will result in a significant
		activities, which will result in a significant

State CEQA Guidelines § 15168(c)(4) Checklist for Commercial Cannabis Land Use Entitlement and Licensing Applications
Page 7

	environmental impact that was not evaluated in the PEIR? Examples of unusual environmental characteristics or development activities which might cause a significant environmental impact include, but are not limited to:
	<ul> <li>construction of a bridge across a riparian corridor that supports listed species protected under the Federal or California endangered species acts, in order to gain access to a project site;</li> <li>structural development that cannot be screened from a public viewing location pursuant to the requirements of PEIR mitigation measure MM AV-1 (Screening Requirements); or</li> <li>development activities that will have a significant impact on cultural resources, which cannot be mitigated to a less-thansignificant level pursuant to the County's</li> </ul>
	Environmental Thresholds and Guidelines Manual (March 2018).

LUDC = Land Use and Development Code; Chapter 35, Article 35.1 et seq., of the Santa Barbara County Code Article II = Coastal Zoning Ordinance; Chapter 35, Article II, § 35-50 et seq., of the Santa Barbara County Code CLUP = Santa Barbara County Coastal Land Use Plan

State CEQA Guidelines = California Code of Regulations, Title 14, Division 6, Chapter 3, § 15000 et seq.

#### **C.1.1** Environmental Document Determination

Check the appropriate box below, based on the responses to the questions and requests for information set forth in the checklist in § C.1, above, and pursuant to the requirements set forth in State CEQA Guidelines §§ 15162 and 15168.

- x All of the environmental impacts of the proposed commercial cannabis operation are within the scope of the PEIR, and a subsequent environmental document is not required to evaluate the environmental impacts of the proposed commercial cannabis operation.
- The proposed commercial cannabis operation will have environmental effects that were not examined in the PEIR, and an initial study must be prepared to determine whether a subsequent environmental impact report or negative declaration must be prepared.

Melanie Jackson	(1) Jord	10/28/10
Name of Preparer of § C.1	Signature of Preparer of § C 1	Date

#### C.2 Mitigation Measures/Requirements for CEO Staff Review

Mitigation Measure/Requirement	Code/Plan Sections* Requirement		
Air Quality and Greenh	ouse Gas Emissions		
MM UE-2a. Energy Conservation Best Management Practices	BLO § 50-10(b)	Does the proposed project include the implementation of the required energy conservation plan? ☐ Yes ☐ No	
MM UE-2b. Participation in a Renewable Energy Choice Program	BLO § 50-10(b)2.ii	Does the proposed project include participation in a renewable energy choice program to meet the applicable energy reduction goals for the proposed project?  □ Yes □ No	
MM UE-2c. Plan review by the County Green Building	BLO § 50-10(b)2.iii.K	Did the County Green Building Committee review the proposed project? ☐ Yes ☐ No ☐ N/A	
Committee		If so, does the proposed project conform to the recommendations of the County Green Building Committee? ☐ Yes ☐ No ☐ N/A	
Utilities and Energy Con			
MM UE-2a. Energy Conservation Best Management Practices			
MM UE-2b. Participation in a Renewable Energy Program	See the Air Quality and	Greenhouse Gas Emissions items, above.	
MM UE-2c. Licensing by the County Green Building Committee	See the Air Quality and Greenhouse Gas Emissions items, above.		
Unusual Project Site Ch	aracteristics and Develo	pment Activities	
Activities and Impacts within the Scope of the Program/PEIR	State CEQA Guidelines § 15168(c)(1)	Does the proposed project involve a project site with sensitive or unusual environmental characteristics, or require unusual development activities, which will result in a significant environmental impact that was not evaluated in the PEIR? Examples of unusual environmental characteristics or development activities which might cause a significant environmental impact include, but are not limited to:	
		<ul> <li>construction of a bridge across a riparian corridor that supports listed species protected under the Federal or California endangered species acts, in order to gain access to a project site;</li> <li>structural development that cannot be screened from a public viewing location</li> </ul>	

State CEQA Guidelines § 15168(c)(4) Checklist for Commercial Cannabis Land Use Entitlement and Licensing Applications
Page 9

Mitigation Measure/Requirement	Code/Plan Sections*	Requirement
		pursuant to the requirements of PEIR mitigation measure MM AV-1 (Screening Requirements); or  • development activities that will have a significant impact on cultural resources, which cannot be mitigated to a less-than-significant level pursuant to the County's Environmental Thresholds and Guidelines Manual (March 2018).
		☐ Yes ☐ No

BLO = Commercial Cannabis Business Licensing Ordinance; Chapter 50, § 50-1 et seq., of the Santa Barbara County Code
State CEQA Guidelines = California Code of Regulations, Title 14, Division 6, Chapter 3, § 15000 et seq.

#### **C.2.1** Environmental Document Determination

Check the appropriate box below, based on the responses to the questions and requests for information set forth in the checklist in § C.2, above, and pursuant to the requirements set forth in State CEQA Guidelines §§ 15162 and 15168.

- All of the environmental impacts of the proposed commercial cannabis operation are within the scope of the PEIR, and a subsequent environmental document is not required to evaluate the environmental impacts of the proposed commercial cannabis operation.
- The proposed commercial cannabis operation will have environmental effects that were not examined in the PEIR, and an initial study must be prepared to determine whether a subsequent environmental impact report or negative declaration must be prepared.

Name of Preparer of § C.2

Signature of Preparer of

ate

# Attachment 1 –Additional Information for the Proposed Cannabis Activity CEQA Environmental Determination

The following provides additional analysis of the environmental impacts associated with the proposed West Coast Farms, Cannabis Cultivation (Outdoor) Project (Proposed Project), pursuant to the requirements of the State CEQA Guidelines §§ 15168(c) and 15162. The State CEQA Guidelines §§ 15168(c)(1) and (2) state:

- (1) If a later activity would have effects that were not examined in the program EIR, a new Initial Study would need to be prepared leading to either an EIR or a Negative Declaration. That later analysis may tier from the program EIR as provided in Section 15152.
- (2) If the agency finds that pursuant to Section 15162, no subsequent EIR would be required, the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required. Whether a later activity is within the scope of a program EIR is a factual question that the lead agency determines based on substantial evidence in the record. Factors that an agency may consider in making that determination include, but are not limited to, consistency of the later activity with the type of allowable land use, overall planned density and building intensity, geographic area analyzed for environmental impacts, and covered infrastructure, as described in the program EIR.

The requirements of the State CEQA Guidelines § 15162 are set forth below along with an analysis of the Proposed Project with regard to these requirements. The following analysis supplements the information set forth in the Program Environmental Impact Report (PEIR) for the Cannabis Land Use Ordinance and Licensing Program (Program), State CEQA Guidelines § 15168 checklist prepared for the Proposed Project, and other documents in the administrative record regarding the Proposed Project (e.g., Land Use Permit application).

#### State CEQA Guidelines § 15162

In general, the State CEQA Guidelines § 15162 states that when a lead agency has prepared an EIR for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, that certain conditions exist. The specific conditions that warrant the preparation of a subsequent EIR are set forth below, with an analysis of the proposed project immediately following the respective condition.

(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR...due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

The Proposed Project includes a request for a commercial cannabis cultivation activity that was anticipated and evaluated in the PEIR. The proposed project site is zoned AG-II-100 (Agriculture II, 100 acre minimum lot size) which is one of the zones in which outdoor

cultivation activities was evaluated in the PEIR (PEIR pages 2-33 and 2-36, Table 2-5). Furthermore, the Santa Ynez Valley in which the Proposed Project site is located was one of five regions identified in the PEIR for organizing the data and analyzing the environmental impacts of the Program; the PEIR considered the existing development, physical features, regulatory environment, and unique atmospheric conditions of the Santa Ynez Valley (e.g., temperature inversions that can affect the dispersion of air emissions and odors) when evaluating the impacts of the Program (Ibid, Chapter 2 especially page 2-5, and page 3.3-1, Section 3.3.2.1). Therefore, the Proposed Project will not result in a change in the type or location of commercial cannabis activities that were evaluated in the PEIR.

Currently, there are approximately 23 land use entitlement applications (including the subject application for a LUP) involving proposed or permitted cannabis activities located generally east of the City of Buellton and near State Route 246 (Santa Barbara County Interactive Map Cannabis, available https://sbcopad.maps.arcgis.com/apps/webappviewer/index.html?id=f287d128ab684ba4a87f 1b9cff438f91, accessed on October 24, 2019). The PEIR anticipated that certain areas (e.g., the Carpinteria Valley) in which cannabis activities historically have occurred would continue to experience cannabis activities under the Program. Furthermore, the PEIR projected the demand for cannabis cultivation that could occur under the Program (i.e., 1,126 acres of cultivation countywide), based on information that was known at the time the PEIR was prepared. However, the Program that was analyzed in the PEIR did not include an artificial cap or other requirement to limit either the concentration or total amount of cannabis activities that could occur within any of the zones that were under consideration for cannabis activities (Ibid, pages 3-3, 3-5, 3-12, 3.1-19, and 3.12-26). Therefore, the number and/or location of the commercial cannabis activities that have been either permitted or are currently under consideration within the general area of the Proposed Project site, do not constitute a substantial change in the Program.

Furthermore, the concentration of cannabis activities near the Proposed Project site will not create new significant environmental effects or a substantial increase in the severity of previously identified significant effects evaluated in the PEIR. The PEIR evaluated the cumulative impacts to which cannabis activities, as well as other pending, recently approved, and reasonably foreseeable non-cannabis projects, would contribute (Ibid, page 3-11, Section 3.0.4). The PEIR concluded that unavoidably significant (Class I) impacts would result from the 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

<sup>&</sup>lt;sup>1</sup> The PEIR states, "...[T]he impact analysis in this EIR assumes that **future cannabis activity licenses would not be limited under the Project**, with the total area permitted to be unincorporated areas Countywide that are under County jurisdiction (excludes incorporated cities, state, federal, and tribal lands) (PEIR, page 3-5, emphasis added)."

The Proposed Project would contribute to these cumulative impacts and would be subject to the mitigation measures set forth in the PEIR to reduce the Proposed Project's contribution to these cumulative impacts. However, these are not new impacts resulting from a substantial change in the Program. As stated above, the Proposed Project is an activity that was anticipated to result from the Program and, consequently, the impacts associated with the Proposed Project were disclosed in the PEIR. Furthermore, the PEIR did not assume that there would be a cap or other limitation on activities which would prevent a concentration of cannabis activities on agricultural lands, such as what is occurring within proximity to the Proposed Project site. As such, the PEIR analysis of cumulative impacts accounted for the impacts from the Proposed Project and other projects located within proximity to the Proposed Project site.

Therefore, the Proposed Project will <u>not</u> result in substantial changes to the Program which will require major revisions of the PEIR, due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR...due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

As stated above, the Proposed Project consists of an activity and will result in impacts that were disclosed in the PEIR. Outdoor cultivation is a cannabis activity that was anticipated to occur on AG-II zoned lands, such as the AG-II zoned lands which exist in the Santa Ynez Valley on which the Proposed Project site is located. The PEIR evaluated the potential increases in employment, traffic, noise, air emissions (including odors), etc., that would result from the Proposed Project and other commercial cannabis activities allowed under the Program. In addition, all of the physical development that is included in the Proposed Project (e.g., fencing, lighting, landscaping, and accessory storage buildings) was evaluated in the PEIR with regard to aesthetics, visual impacts, and loss of prime soils. Finally, the PEIR did not assume that there would be a cap or other limitation on activities which would prevent a concentration of cannabis activities within a specific geographic location, and the PEIR evaluated the cumulative impacts associated with such unlimited commercial cannabis development.

Therefore, the Proposed Project will <u>not</u> cause a substantial change to occur with respect to the circumstances under which the Program is undertaken which will require major revisions of the PEIR, due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified...shows any of the following:

### (A) The project will have one or more significant effects not discussed in the previous EIR....

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 Program. More specifically, the PEIR identified the following unavoidably significant (Class I) impacts that would result from the Program:

- Cumulative impacts to aesthetics and visual resources
- Cumulative impacts to agricultural resources
- Project-specific and cumulative impacts to air resources (including odors)
- Project-specific and cumulative noise impacts
- Project-specific and cumulative transportation and traffic impacts

The PEIR also identified the following significant but mitigable (Class II) impacts that would result from the Program:

- Project-specific impacts to aesthetics and visual resources
- Project-specific impacts to agricultural resources
- Project-specific and cumulative impacts to biological resources
- Project-specific impacts to cultural resources
- Project-specific impacts related to hazards and hazardous materials
- Project-specific impacts related to hydrology and water quality
- Project-specific land use impacts
- Project-specific impacts related to utilities and energy conservation

The PEIR identified a number of mitigation measures to reduce the significant impacts that would result from the implementation of the Program. The mitigation measures were included as development standards and other regulations of Chapters 35 and 50 of the County Code, which are applied to commercial cannabis activities resulting from the Program. As shown in Section C of the State CEQA Guidelines § 15168(c)(4) checklist that was prepared for the Proposed Project, the Proposed Project would be subject to the applicable mitigation measures that were included as development standards and other regulations of Chapters 35 and 50 of the County Code.

As stated above, the PEIR did not assume that there would be a cap or other limitation on activities that would prevent a concentration of cannabis activities within any given specific geographic location. Therefore, although the PEIR did not predict the specific commercial cannabis applications on the properties located on and around the Proposed Project site, the programmatic analysis was broad enough to account for this pattern of development that has resulted from the Program. Furthermore, the concentration of commercial cannabis activities will not result in a new significant impact which was not disclosed in the PEIR; the project-specific and cumulative impacts associated with aesthetics and visual resources, agricultural resources, air resources (including odors),

noise, and traffic resulting from the Proposed Project and other proposed projects located within proximity to the Proposed Project site, were evaluated in the PEIR.

Therefore, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the PEIR was certified, which shows that the Proposed Project will have one or more significant effects not discussed in the PEIR.

# (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

As stated above, the Proposed Project consists of a cannabis activity that was analyzed in the PEIR. There are no unique features of the Proposed Project such that the Proposed Project could cause more severe impacts than shown in the PEIR. The PEIR analyzed the impacts of outdoor cultivation of cannabis on AG-II zoned lots within the Santa Ynez Valley.

Furthermore, the PEIR did not assume that there would be a cap or other limitation on activities which would prevent a concentration of cannabis activities within any given specific geographic location. Although the PEIR did not predict the specific commercial cannabis applications on the properties located on and around the Proposed Project site, the programmatic analysis was broad enough to account for this pattern of development, and disclosed the corresponding impacts that would result.

Therefore, there is not new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the PEIR was certified, which shows that significant effects previously examined will be substantially more severe than shown in the PEIR.

(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

There are no mitigation measures or alternatives previously found not to be feasible that would in fact be feasible, and would substantially reduce one or more significant effects of the Proposed Project, which are available at this time for the project proponents to consider.

(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

There are no mitigation measures or alternatives that are considerably different from those analyzed in the previous EIR that would substantially reduce one or more significant

State CEQA Guidelines § 15168(c)(4) Checklist for Commercial Cannabis Land Use Entitlement and Licensing Applications
Page 15

effects on the environment. As such, there are no mitigation measures, that the project proponents decline to adopt.

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# **CONTACT LIST**

#### OWNER

PACIFIC COAST ENTERPRISES, LLC. 7660 FAY STREET, #H-247 LA JOLLA, CALIFORNIA 92037 P: 858.750.0502 C: KAVAUGHN BAGHBEH

#### CONSULTANT

HIGH ROAD CONSULTING GROUP 14201 PALM DRIVE, SUITE 105 DESERT HOT SPRINGS, CALIFORNIA 92240 P: 760.671.5647 C: SIMONE SANDOVAL

#### PLANNING CONSULTANT

JAY HIGGINS 3217 CALLE NOGUERA SANTA BARBARA, CALIFORNIA 93105 P: 805.637.6670

#### LANDSCAPE ARCHITECT

PLEINAIRE DESIGN GROUP 3203 LIGHTNING STREET, SUITE 201 SANTA MARIA, CALIFORNIA 93455 P: 805.349.9695 C: KEVIN J. SMALL

# PUBLIC AGENCIES

#### **COUNTY OF SANTA BARBARA**

PLANNING & DEVELOPMENT 624 WEST FOSTER ROAD SANTA MARIA, CALIFORNIA P: 805.934.6250

# PROPERTY STATISTICS

- 1. LOT SIZE: 82 ACRES
- 2. CULTIVATION PREMISES AREA: 40 ACRES
- 3. APN#: 099-240-067

# PROJECT DESCRIPTION

PROJECT DESCRIPTION COPIED FROM PROJECT APPLICATION

# PROJECT NOTES

THE PROJECT SHALL BE CONSISTENT WITH THE FOLLOWING DEVELOPMENT STANDARDS SET FORTH IN THE SANTA YNEZ VALLEY COMMUNITY PLAN:

DEVSTD BIO-SYV-3.1: DEVELOPMENT SHALL NOT INTERRUPT MAJOR WILDLIFE TRAVEL CORRIDORS. TYPICAL WILDLIFE CORRIDORS INCLUDE RIPARIAN

HABITATS, RIVERS, STREAMS AND FLOODPLAINS, AND UN-FRAGMENTED AREAS OF GRASSLAND, OAK WOODLAND AND COASTAL SCRUB. CORRIDORS SHALL ALLOW FOR WILDLIFE MOVEMENT. WHERE PRACTICAL, OPTIONS FOR ROAD

UNDER-CROSSINGS SHALL BE EXPLORED.

DEVSTD BIO-SYV-4.2: ONLY FULLY SHIELDED (FULL CUTOFF) NIGHT LIGHTING SHALL BE USED NEAR STREAM CORRIDORS. LIGHT FIXTURES SHALL BE DIRECTED AWAY FROM THE STREAM CHANNEL.

DEVSTD BIO-SYV-5.1: SITE DRAINAGE PLANS SHALL DIRECT POLLUTING DRAINAGE AWAY FROM THE STREAM CHANNEL OR INCLUDE APPROPRIATE FILTERS.

# SANTA BARBARA WEST COAST FARMS, LLC.

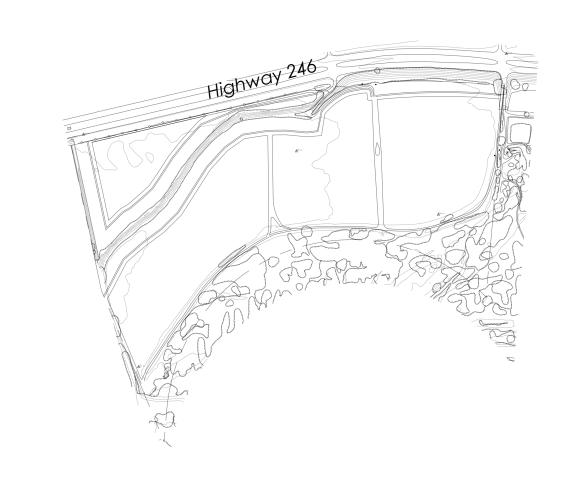
DEVELOPMENT PLAN
PERMIT APPLICATION

1800 WEST HIGHWAY 246 BUELLTON, CALIFORNIA 93427

# **REVISION DATES**

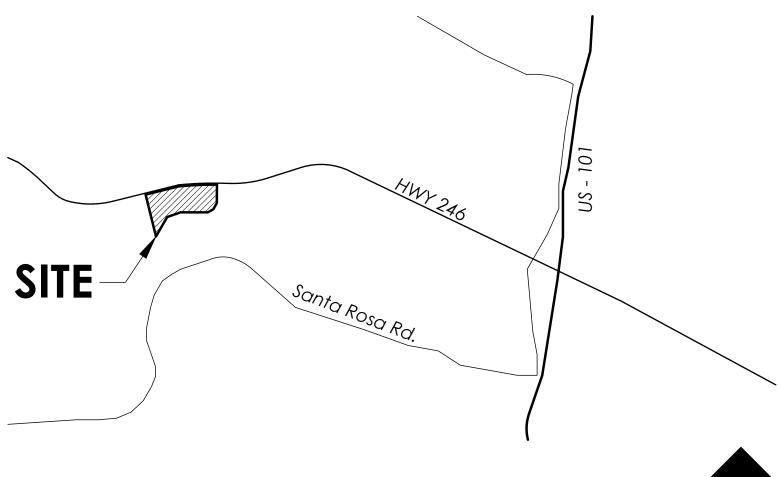
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3				
2				
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REV.	DATE	ВҮ	APPROVED	COMMENTS

# SITE MAP





# **LOCATION MAP**





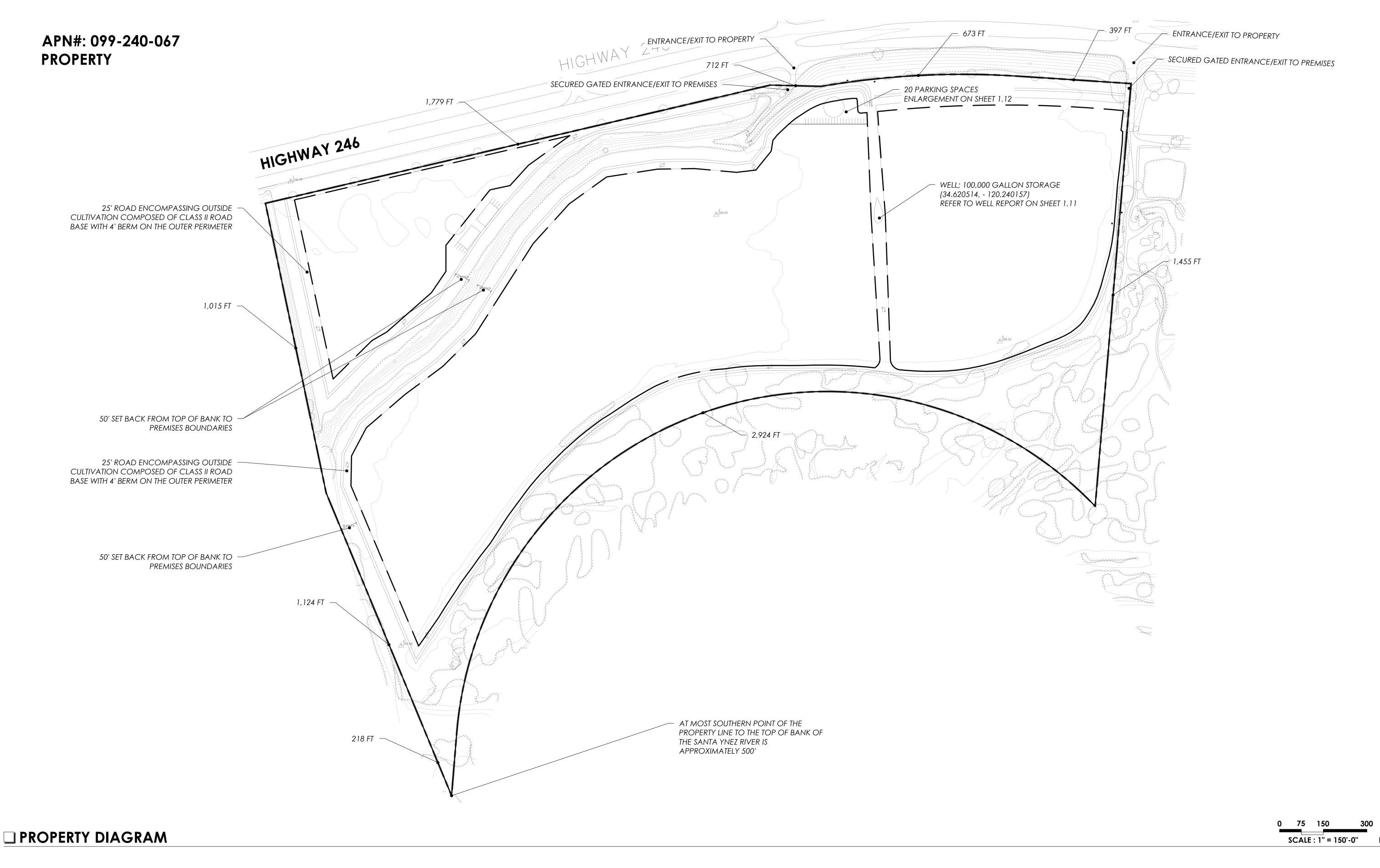
# SHEET LEGEND

TRANSPORTATION DEMAND MANAGEMENT PLAN

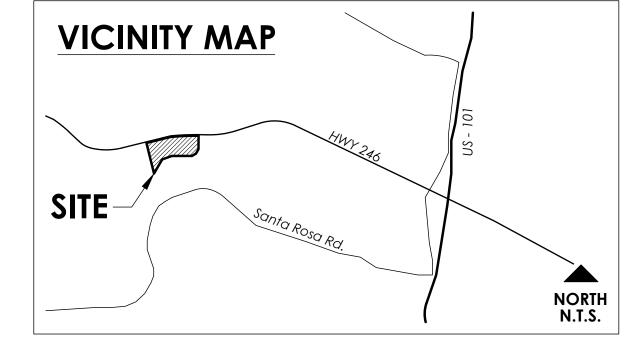
L-0.0	COVER SHEET
L-1.0	PROPERTY DIAGRAM
L-1.1	PREMISES DIAGRAM
L-1.2	LIGHTING PLAN
L-1.3	FENCING & SECURITY PLAN
L-1.4	LANDSCAPE SCREENING PLAN
L-1.5	SCREENING ENLARGEMENT
L-1.6	SCREENING IRRIGATION & NOTES
L-1.7	SCREENING IRRIGATION DETAILS
L-1.8	BUILDING NOTES
L-1.9	BUILDING PERSPECTIVE
L-1.10	ODOR ABATEMENT SYSTEM
L-1.11	NOISE PLAN
L-1.12	DETAILS & NOTES

L-0.0



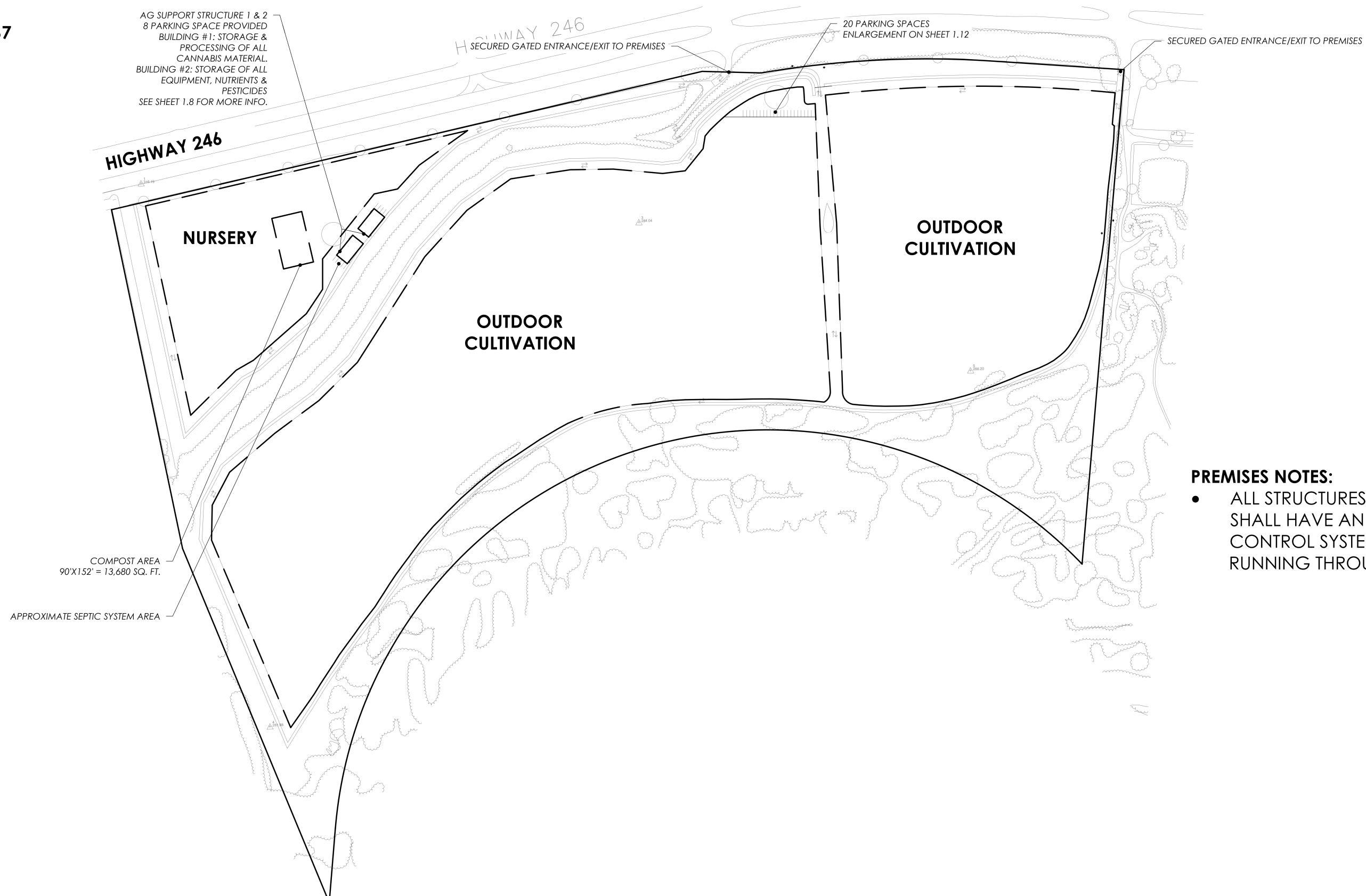


PLEINAIRE
DESIGN GROUP
3203 Lightning St., Suite 201 // Santa Maria, CA 93455
805.349.9695 // www.pleinairedg.com
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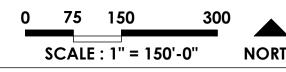


1800 WEST HIGHWAY 246 // BUELLTON, CALIFORNIA 93427

APN#: 099-240-067 **PROPERTY** 

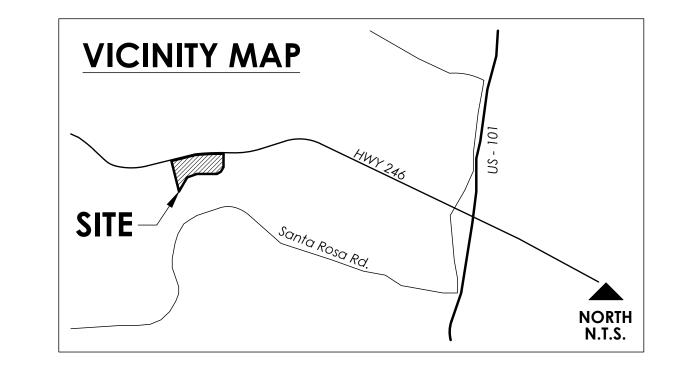


☐ PREMISES DIAGRAM





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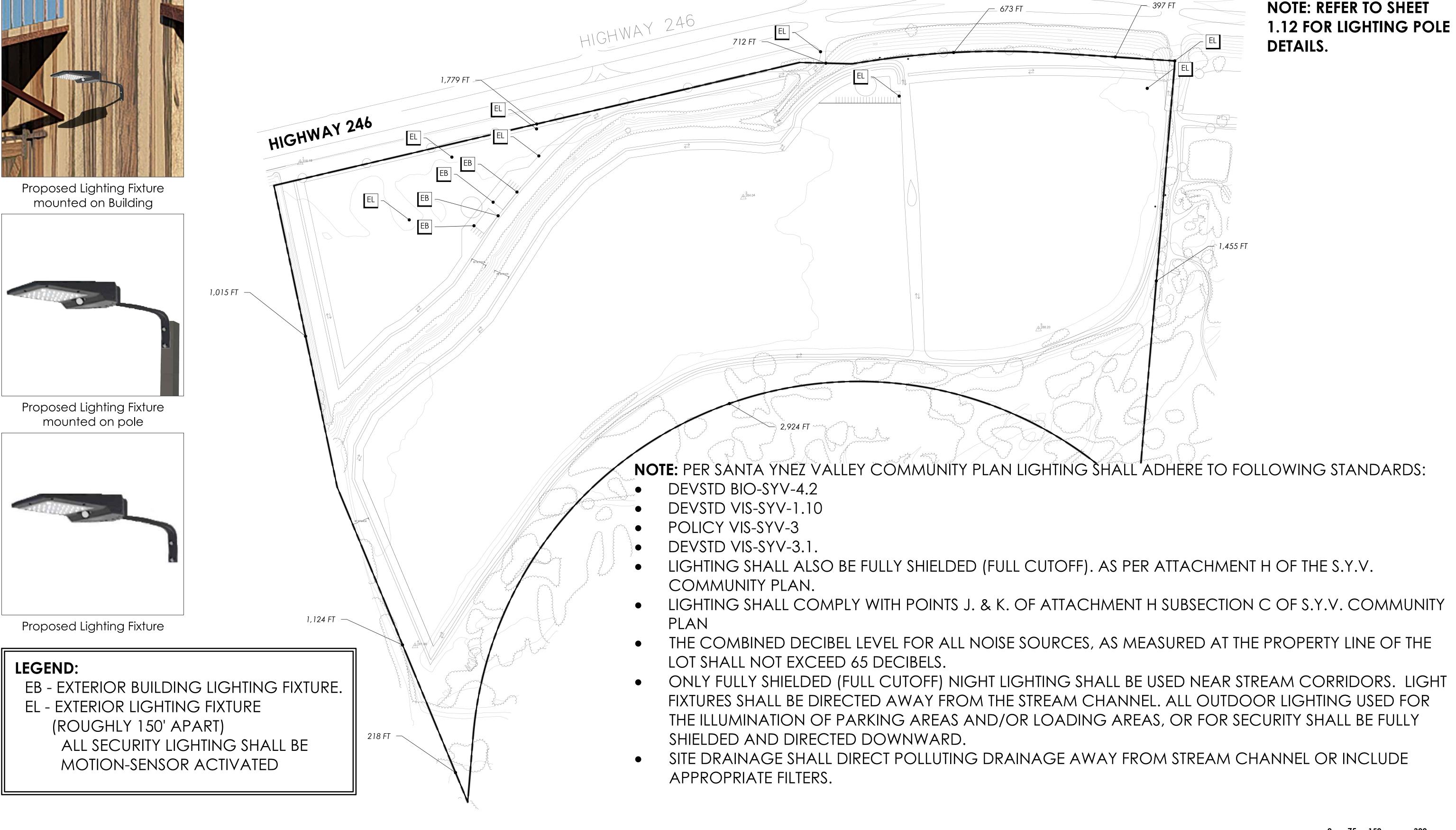
PREMISES NOTES:

ALL STRUCTURES ON SITE

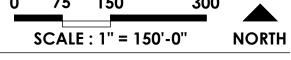
RUNNING THROUGH THEM

SHALL HAVE AN ODOR

CONTROL SYSTEM

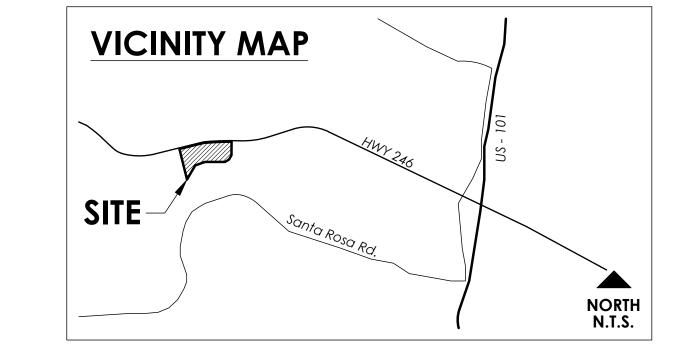


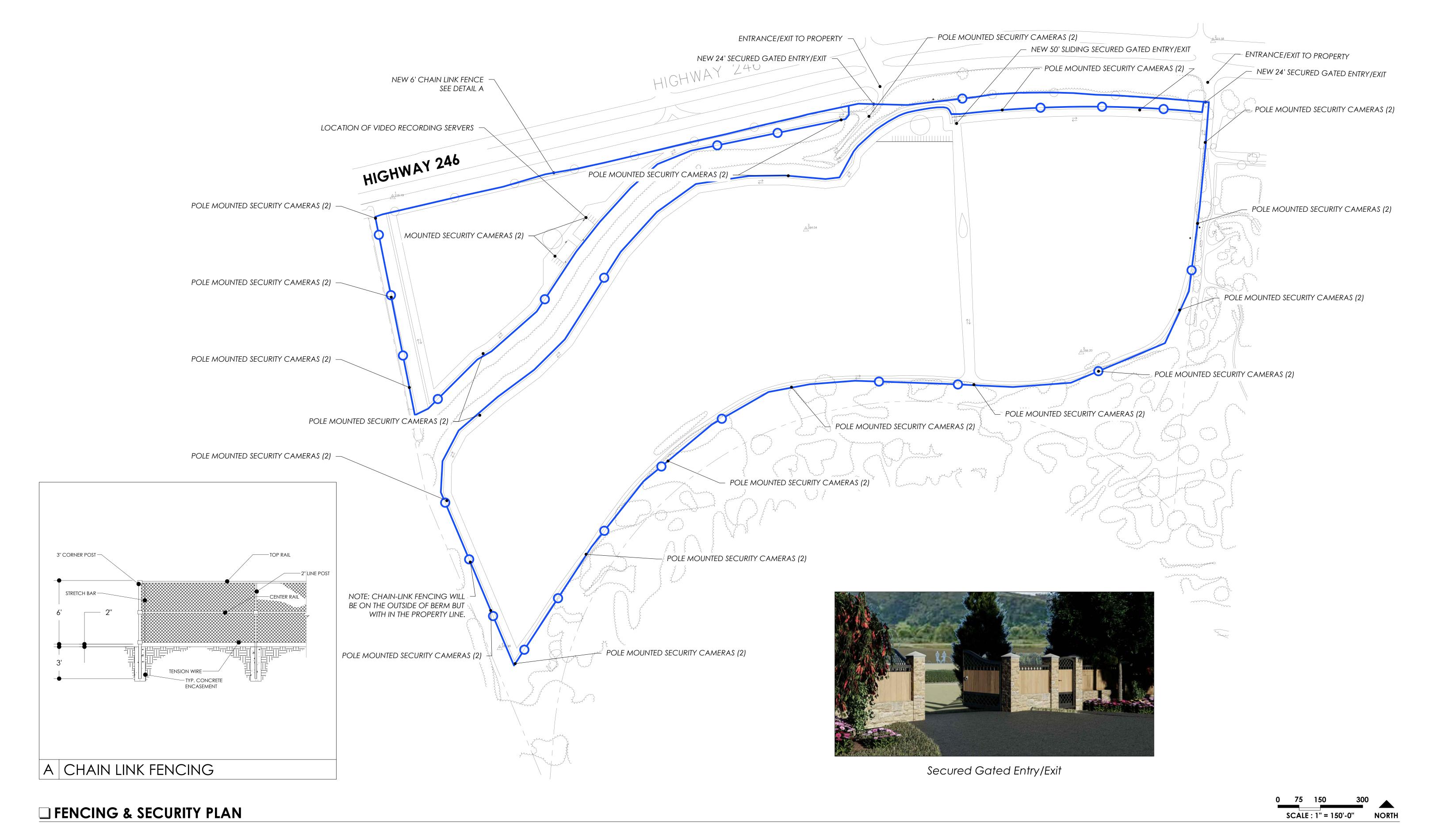
☐ LIGHTING PLAN



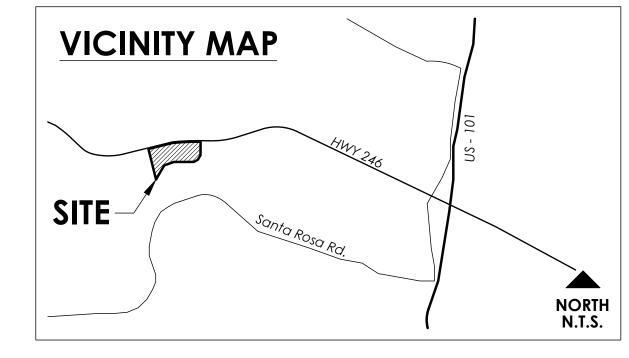


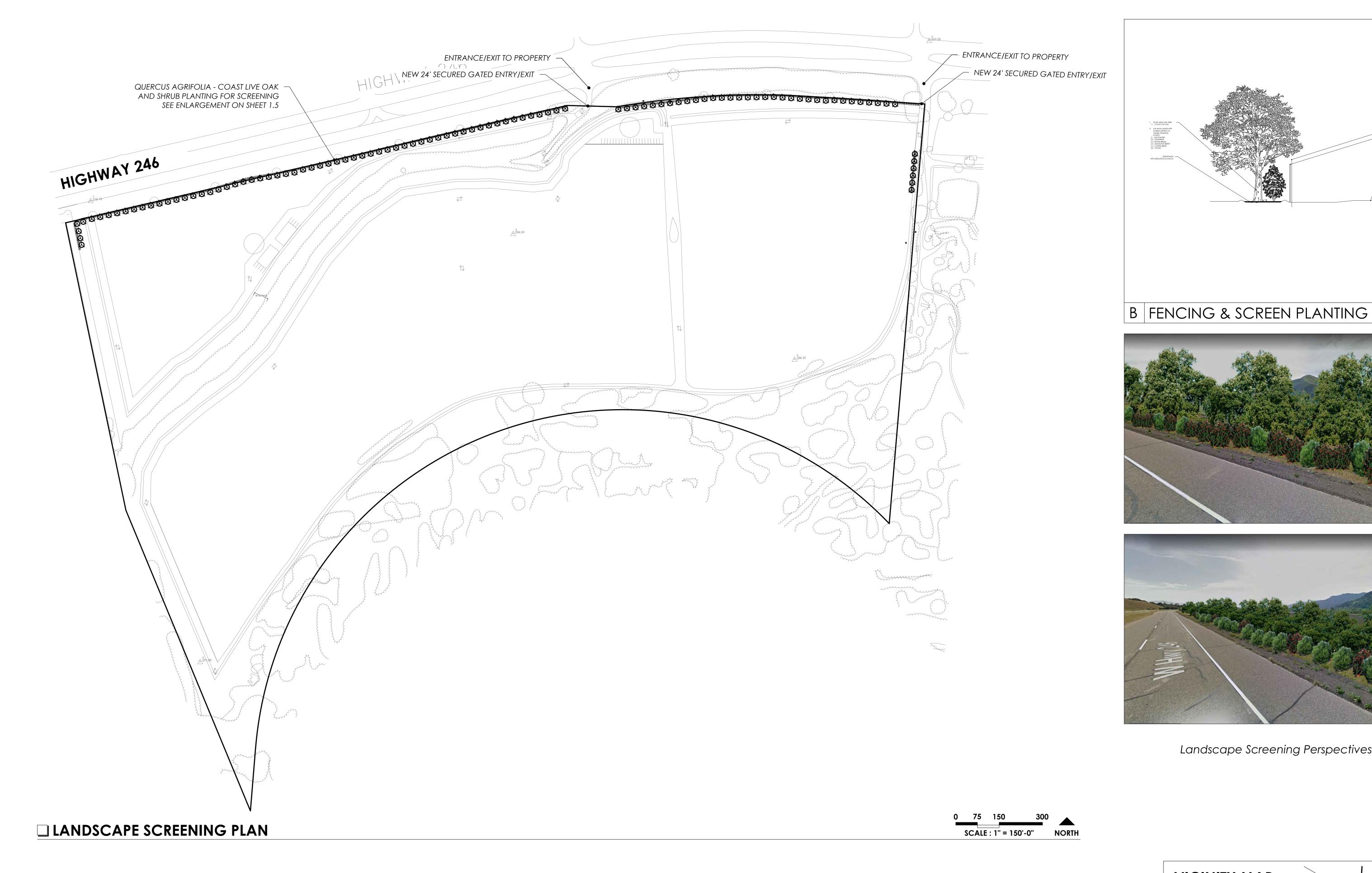




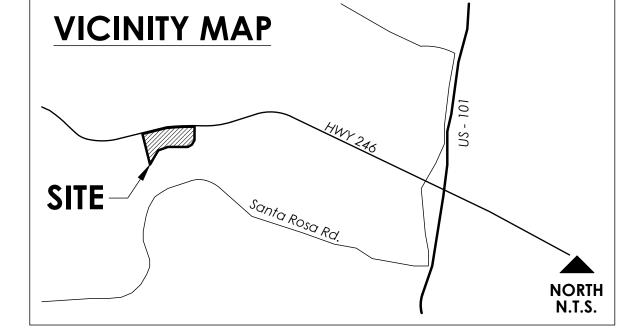


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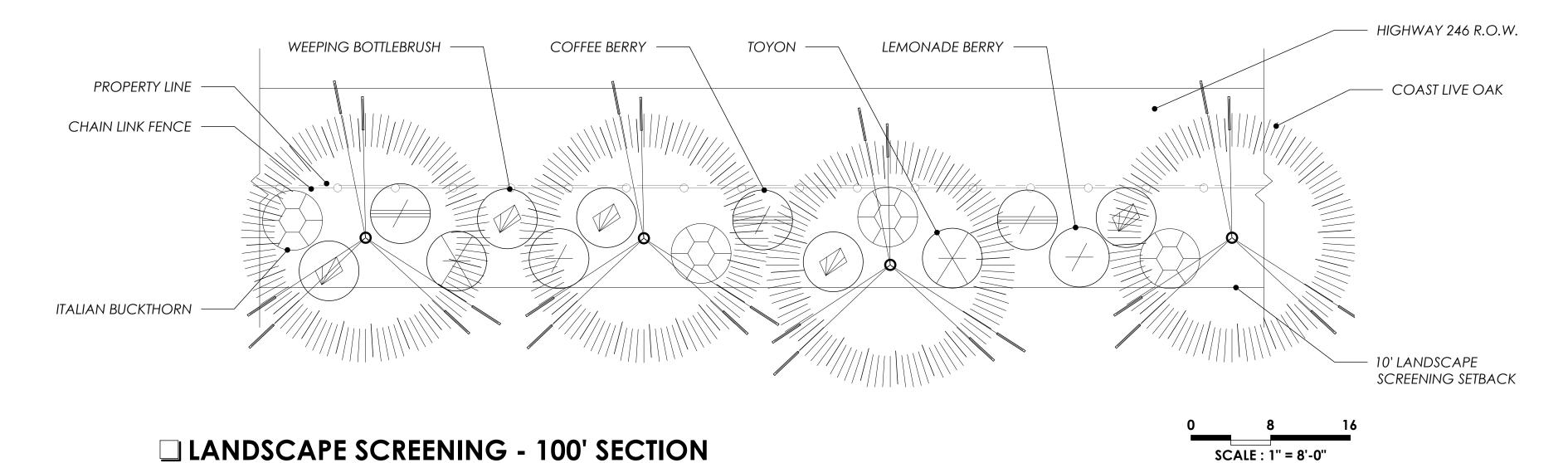




Landscape Screening Perspectives



### HIGHWAY 246



LANDSCAPE IRRIGATION SCREENING CALCS 1800 W Highway 246 8/30/2019

Landscape Screening Area	30,42	23	Sq. ft.	
Total Landscape Screening Linear Feet	3,04	12	ft.	
Landscape Screening per 100' Sections	3	30	Sections	
Plant Legend:				Total # of Plan
Trees Coast Live Oak		4	x 30 sec	12
Shrubs				
Italian Buckthorn		4	x 30 sec	12
Weeping Bottlebrush		5	x 30 sec	15
Coffee Berry		3	x 30 sec	9
Lemonade Berry		2	x 30 sec	6
Toyon		2	x 30 sec	6
	Site Total:		15 Gal. Trees	1
			5 Gal. Shrubs	1

3" MEDIUM BARK ROOTBALL EQUAL WITH FINISH GRADE 3" HIGH WATERING FINISH GRADE SET STAKES PERPENDICULAR TO THE PREVAILING WIND AS SHOWN ABOVE. ROOTBALL 3" WATERING FERTILIZER TABLETS STAKE TO TREE, NAIL TO STAKE PER SPECIFICATIONS PER SPECS FINISH GRADE UNTREATED TREE STAKES BACKFILL PER SPECS PER SPECS. PLANT PIT (SIZE PER 3" MEDIUM BARK MULCH **ROOT BALL** COMPACTED 2x DIA. BACKFILL, PER SPECS. **BACKFILL** ROOTBALL MIN COMPACTED BACKFILL "A" =  $\frac{2}{3}$  TREE HEAD HEIGHT "B" =  $\frac{1}{3}$  TREE HEAD HEIGHT C TREE PLANTING D SHRUB PLANTING

40% of Total # of Shrubs 60% of Total # of Shrubs

## ☐ SCREENING ENLARGEMENT

## SANTA BARBARA WEST COAST FARMS, LLC.

**SHEET 1.5** 

## TYPICAL PLANT LEGEND (PER 100' OF LANDSCAPE SCREENING)

SYMBOL	NAME	COMMENTS	SIZE	WUCOLS	QTY
	QUERCUS AGRIFOLIA COAST LIVE OAK	PLANT PER DETAIL C	15 GAL.	LOW	4
SHRUBS		COMMENTS	C17F	WIICOIS	OT)
SYMBOL	NAME	COMMENTS	SIZE	WUCOLS	QTY
	RHAMNUS ALATERNUS ITALIAN BUCKTHORN	PLANT PER DETAIL D	NOTE*	LOW	4
	CALLISTEMON VIMINALIS WEEPING BOTTLEBRUSH	PLANT PER DETAIL D	NOTE*	LOW	5
	FRANGULA CALIFORNICA COFFEE BERRY	PLANT PER DETAIL D	NOTE*	LOW	3
<del></del>		PLANT PER DETAIL D PLANT PER DETAIL D	NOTE*	LOW	2

NOTE\*: FOR SHRUB SIZES, 40% SHALL BE 5 GAL. & 60% SHALL BE 1 GAL.

#### PLANTING LEGEND NOTES

- ALL TREES ARE TO BE STAKED PER DETAIL C/SHEET 1.5
- 2. ALL SHRUBS ARE TO BE PLANTED PER D/SHEET 1.5
- 3. CONTRACTOR IS TO PROVIDE AN AUTOMATIC IRRIGATION SYSTEM WITH 100% COVERAGE AND SEPARATE SUN/SHADE AND TURF/GROUNDCOVER SYSTEMS. REFER TO IRRIGATION PLANS FOR SPECIFICS OF INSTALLATIONS.
- 4. CONTRACTOR SHALL NOT DETOUR FROM ANY OF THE PLANT MATERIAL ON THE LIST UNLESS CONSULTING WITH THE LANDSCAPE ARCHITECT FIRST.
- 5. CONTRACTOR SHALL INSTALL HEADER AT THE EDGE OF ALL TURF TO SHRUB AREAS. SEE DETAILS FOR MATERIAL
- 6. ALL SHRUB AREAS SHALL RECEIVE A 3" LAYER OF MEDIUM SIZED FIR MULCH 1/2" TO 1" IN DIAMETER. TOP SURFACE OF MULCH SHALL BE A MINIMUM OF 1" BELOW ANY ADJACENT HARDSCAPE. "GORILLA HAIR" OR POST CONSTRUCTION WASTE WILL NOT
- 7. ALL SLOPE AREAS 3:1 OR GREATER SHALL HAVE JUTE NETTING OR EQUIVALENT SLOPE STABILIZATION MATERIAL APPLIED ON TOP OF ANY APPLIED MULCH.
- 8. ALL PLANT MATERIAL, COLOR, SIZE AND QUANTITIES ARE TO BE VERIFIED WITH OWNER.

#### GENERAL PLANTING NOTES

- REMOVE ALL DEBRIS, WEEDS, EXCESS MATERIAL AND ROCKS LARGER THAN 3" IN DIAMETER FROM PLANTING AREAS.
- 2. CROSS RIP ALL TURF AND PLANTING AREAS TO A DEPTH OF 12" AND BLEND THE FOLLOWING AMENDMENT INTO THE TILLED SOIL TO A DEPTH OF 6".
  - - 2.1.1. 6 CUBIC YARDS NITROGEN AND IRON FORTIFIED ORGANIC SOIL AMENDMENT
  - 2.1.2. 14 POUNDS 12-12-12 FERTILIZER 2.1.3. 15 POUNDS SOIL SULFUR
- 3. EXCAVATE THE PLANTING PITS FOR TREES AND SHRUBS TWICE THE DIAMETER AND TWICE THE DEPTH OF THE ROOT BALL SCARIFY THE SIDES AND BOTTOM OF THE PIT. THE BACKFILL MIX FOR USE AROUND THE ROOT BALL SHALL CONSIST OF THE
  - 3.1. PER CUBIC YARD OF SOIL:
  - 3.1.1. 1/3 CUBIC YARD NITROGEN STABILIZED FIR BARK
    - 3.1.2. 1 POUND 12-12-12 FERTILIZER
  - 3.1.3. 1 1/2 POUNDS IRON SULFATE (20% IRON)

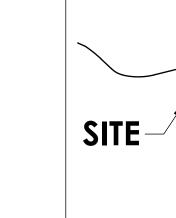
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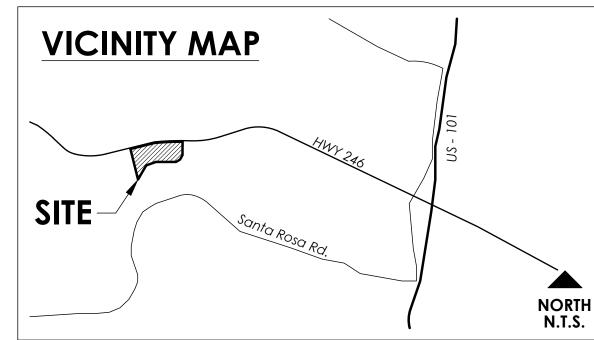
DESIGN GROUP

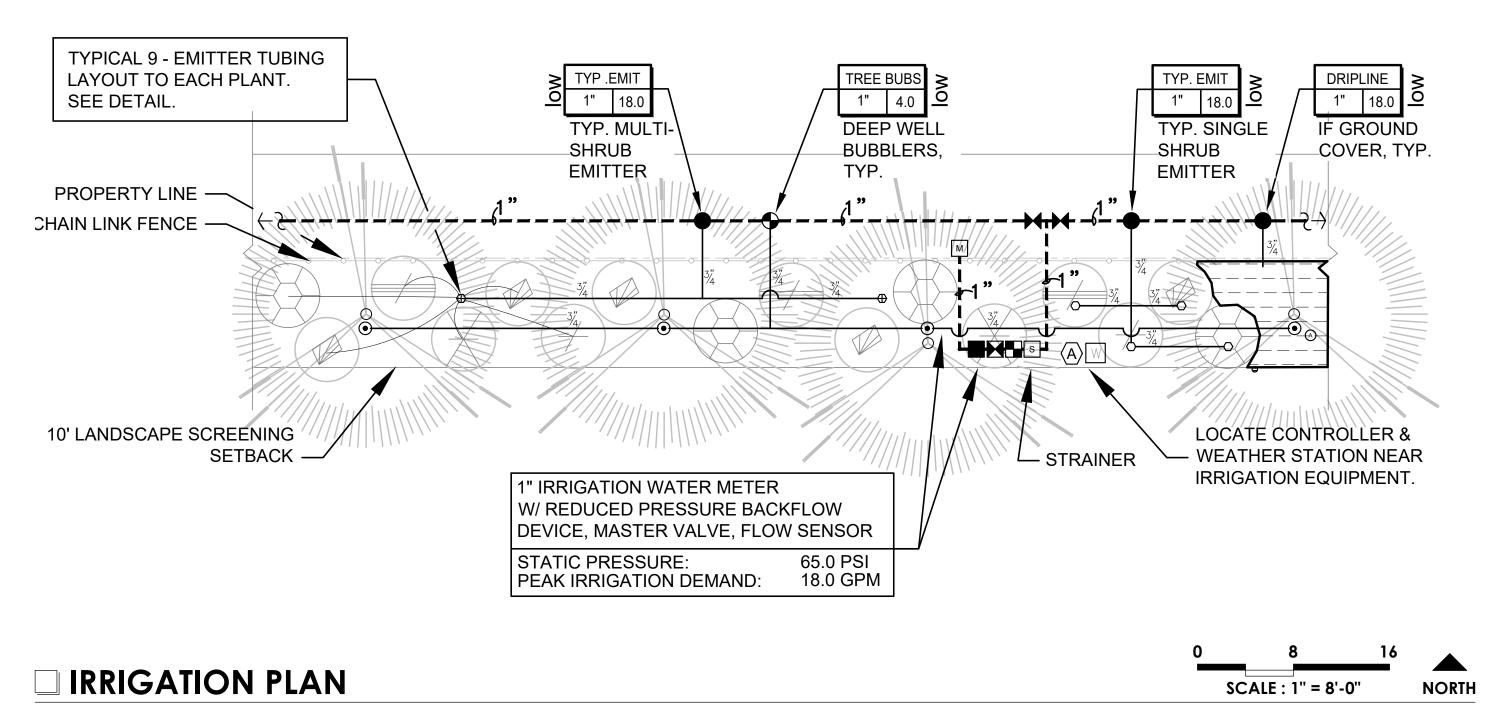
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- 3.1.4. 2/3 CUBIC YARD TOPSOIL
- PLANT TABS SHALL BE AGRIFORM OR APPROVED EQUAL USED AT MANUFACTURER'S RECOMMENDED RATE FOR EACH PLANT SIZE
- 4. SOIL AMENDMENT AND BACKFILL MIX ARE PROVIDED FOR BIDDING PURPOSES ONLY. THE CONTRACTOR SHALL PROVIDE FOR IN HIS BID FOR A SOIL AGRONOMY REPORT BY AN APPROVED SOIL AGRONOMIST UPON COMPLETION OF THE ROUGH GRADING. ACTUAL SOIL AMENDMENTS AND BACKFILL MIX SHALL BE AS PER SOIL AGRONOMISTS REPORT AND RECOMMENDATIONS.
- 5. FINE PRUNE ALL SPECIMEN TREES AFTER PLANTING UNDER THE DIRECTION OF THE LANDSCAPE ARCHITECT.
- ALL SPECIMEN TREES SHALL BE SELECTED AT THE SOURCE BY THE LANDSCAPE ARCHITECT.
- UPON COMPLETION, REMOVE ALL EXTRANEOUS MATERIAL AND DEBRIS, BROOM AND WASH CLEAN AREA.
- 8. ACTUAL SYMBOLS SHALL HAVE PRIORITY OVER WRITTEN QUANTITIES. CONTRACTOR SHALL VERIFY QUANTITIES AND NOTIFY LANDSCAPE ARCHITECT OF DISCREPANCIES.
- 9. ALL PLANT MATERIAL, COLOR, SIZE AND QUANTITIES ARE TO BE VERIFIED WITH OWNER.
- 10. ALL SUBSTITUTIONS SHALL BE APPROVED BY LANDSCAPE ARCHITECT AND OWNER, PRIOR TO INSTALLATION.
- 11. ALL FLOW LINES ESTABLISHED BY GRADING PLAN SHALL BE MAINTAINED BY FINISH GRADING. MAINTAIN 1.5% MINIMUM FLOW IN ALL PLANTER AREAS.







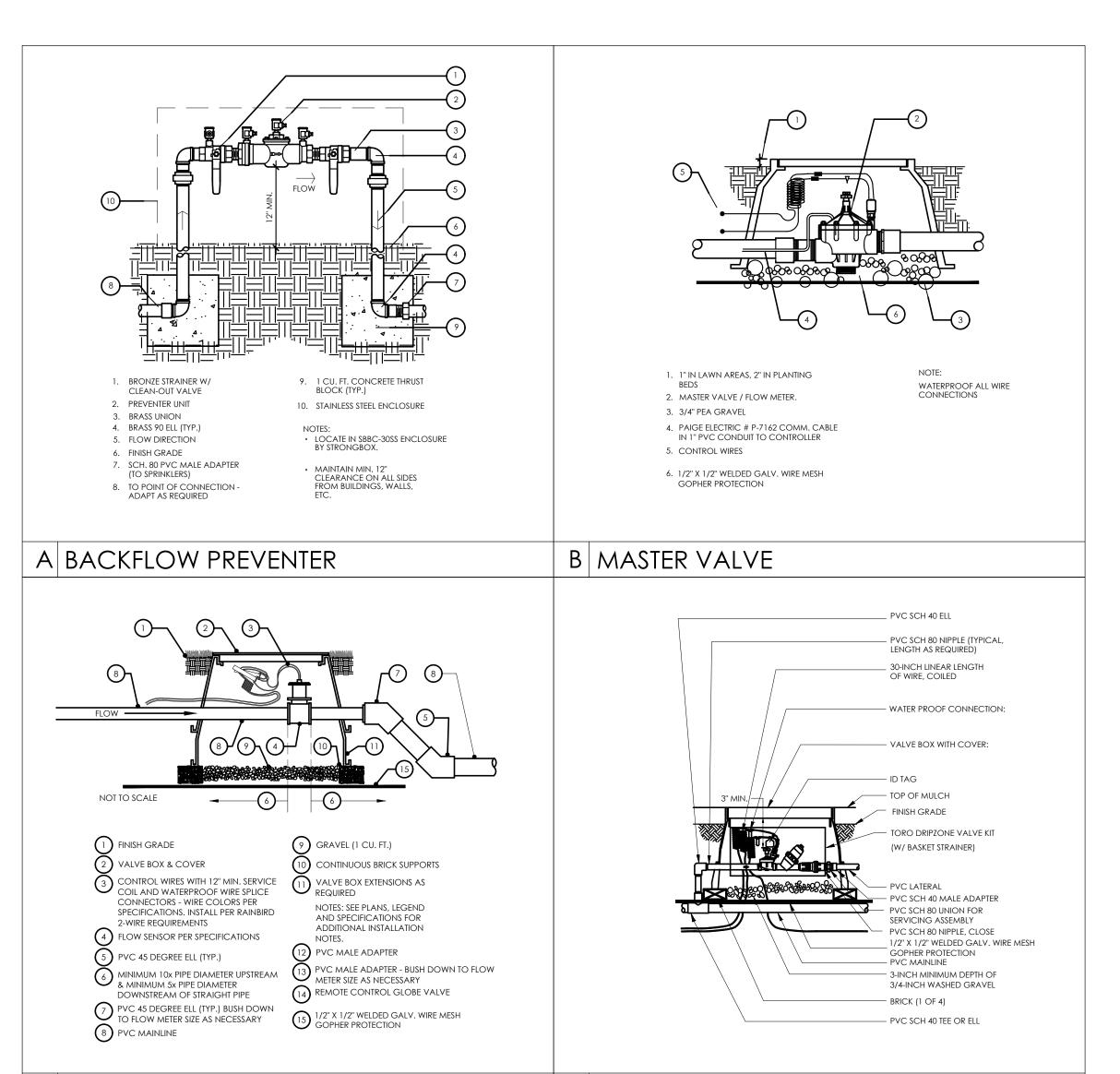


#### TYPICAL IRRIGATION EQUIPMENT LEGEND (PER 100' OF LAND. SCREENING)

SY	MBOLS		MANUFACTURER	ITEM	GPM	PATTERN	R	PSI		
E		TORO	# DL2000 RGP 4-18-01	DRIPLINE @ 18" O.C. TURF	0.009	FLOOD	-	30		
	•	RAINBIRD	# RWS-B-1402	2- PER TREE DEEP ROOT WATER SYSTEM	1.0	360	-	30		
	0	TORO	# LF-20-PC	SHRUB EMITTER ON RISER	0.03	360	-	30		
	<del>0</del>	TORO	# T-PR25-9 W/ EMITTER T-DPJ08-A-RED	MULTI-OUTLET EMITTER (9), ONE EMITTER PER SURROUNDING PLANTS	0.29	360	-	30		
<u></u>	A-4 1" 6.5		ER AND STATION NUMBER / GPM FLOW	WITH low, med or high PLANT WATER R	EQUIREMEN	NT				
	•	TORO	# TPVF100	REMOTE CONTROL VALVE INSTALLED I	N VALVE BO	X				
		TORO	# DZK-700-1-MF	DRIP MED. FLOW REMOTE CONTROL V	ALVE W/ ST	RAINER IN VALVE BOX				
		TORO	# DZK-700-1-LF	DRIP LOW FLOW REMOTE CONTROL VA	LVE W/ STF	RAINER IN VALVE BOX				
		TORO	# 075-SLSC	3/4" QUICKCOUPLING VALVE INSTALLE	IN VALVE I	вох				
	$\langle A \rangle$	TORO	# EVO-OD-4-SC	EVOLUTION SERIES CONTROLLER OUT W/ WIRELESS WEATHER STATION (ET &						
	$\mathbb{W}$	TORO	# EVO-WS	SMART CONNECT WIRELESS WEATHER	SENSOR					
	X	NIBCO	# T-113	GATE VALVE, LINE SIZE						
	•	TORO	# T-FCH-H-FIPT	TYPICAL AUTOMATIC FLUSH VALVE. IN:	STALLED AT	THE END OF LINE.				
	A	TORO	# T-YD-500-34	AIR RELEASE VALVE						
		TORO	# TFS-075	FLOW CONTROL SENSOR						
		GRISWOLD	# 2230	PRESSURE REGULATING MASTER VALV	/E					
		FEBCO	# 825 YA	REDUCED PRESSURE REGULATOR						
	S	HAYWARD	# 72	72 200 MESH STAINLESS STEEL STRAINER 1" SIZE, LOCATE IN 18"X12" VA				X		
	М	WATER MET	TER	EXISTING DOMESTIC. 3/4 TO 1" SIZE						
_		PVC	SCHEDULE 40	IRRIGATION MAIN, 1" TO 1-1/2" SIZE						
-		PVC	SCHEDULE 40	SPRINKLER LATERAL, USE SCHEDULE						

4" WIRE SLEEVE, PIPE SLEEVE TO BE TWICE THE SIZE OF LATERAL OR MAIN LINE.

SCHEDULE 40



D 1" CONTROL ZONE KIT

## ASSIGNMENT OF RESPONSIBILITY

GENERAL: THE IRRIGATION SYSTEM IS DESIGNED TO PROVIDE FULL COVERAGE OF ALL PLANTING AREAS WITH MINIMUM OVERSPRAY ONTO PAVING, WALKS, WALLS AND EXISTING UTILITIES. THE IRRIGATION CONSULTANT DOES NOT ASSUME ANY MAINTENANCE OBLIGATIONS.

CONTRACTORS RESPONSIBILITIES: THE CONTRACTORS SHALL ASSUME THE SOLE RESPONSIBILITY FOR THE CORRECT ALIGNMENT OF THE SPRINKLER HEADS, PROPER SETTINGS OF CONTROLLER ENCLOSURES AND ALL OTHER IRRIGATION SYSTEM COMPONENTS. THE CONTRACTOR SHALL BE SOLELY RESPONSIBLE FOR ADJUSTING THE WATERING CYCLES TO SUIT THE SEASONAL REQUIREMENTS. ADJUST THE WATERING CYCLES TO THE SOILS INFILTRATION RATE. NO RUN OFF SHALL OCCUR AT ANY TIME. THE INSTALLATION CONTRACTOR SHALL INSTRUCT THE MAINTENANCE CONTRACTOR IN THE USE AND ADJUSTMENT OF THE IRRIGATION SYSTEM. PERFORM ALL REVIEWS AND AUDITS AS CALLED OUT IN THE IRRIGATION MAINTENANCE NOTES AND SUBMIT WRITTEN REPORTS TO THE OWNER.

OWNERS RESPONSIBILITIES: THE OWNER SHALL BE SOLELY RESPONSIBLE FOR OBTAINING "AS BUILT" DRAWINGS AND CONTROLLER CHARTS FROM THE INSTALLATION CONTRACTOR. ANY DANGEROUS CONDITIONS THAT MAY OCCUR DURING THE CONSTRUCTION OR LATER MAINTENANCE PERIOD SHALL BE CORRECTED IMMEDIATELY.

SUBSTITUTIONS: NO SUBSTITUTIONS OF MATERIALS SHALL BE ALLOWED DURING THE CONSTRUCTION OR LATER MAINTENANCE WITHOUT THE WRITTEN CONSENT OF THE IRRIGATION CONSULTANT. ALL REPLACEMENT COMPONENTS SHALL BE AS CALLED OUT ON THE DRAWINGS AND IN THE SPECIFICATIONS. THE CONSULTANT CAN NOT BE HELD RESPONSIBLE FOR ALTERATIONS OF THE IRRIGATION SYSTEM THAT WERE DONE WITHOUT HIS WRITTEN PERMISSION

### **OBSTRUCTIONS**

WHEN VERTICAL OBSTRUCTIONS (PROPS, STREET LIGHTS, TREES, ETC.) INTERFERE WITH THE SPRAY PATTERN OF THE SPRINKLER HEADS SO AS TO PREVENT PROPER COVERAGE, THE IRRIGATION CONTRACTOR SHALL FIELD ADJUST THE SPRINKLER SYSTEM BY INSTALLING A QUARTER CIRCLE OR HALF CIRCLE SPRINKLER HEAD ON EACH SIDE OF THE OBSTRUCTION SO AS TO PROVIDE PROPER COVERAGE. ALL ADJUSTMENTS SHALL BE MADE AT NO ADDITIONAL COST TO THE OWNER.

## ☐ SCREENING IRRIGATION & NOTES

## SANTA BARBARA WEST COAST FARMS, LLC.

1800 WEST HIGHWAY 246 // BUELLTON, CALIFORNIA 93427

SHEET 1.6

C FLOW SENSOR

## PLEINAIRE DESIGN GROUP 3203 Lightning St., Suite 201 // Santa Maria, CA 93455 805.349.9695 // www.pleinairedg.com

2019.10.22

## **MWELO IRRIGATION NOTES**

DESIGN & INSTALLATION REQUIREMENTS FOR THE MODEL WATER EFFICIENT LANDSCAPE ORDINANCE (MWELO) EFFECTIVE DECEMBER 1, 2015 DESIGN AND INSTALLATION SHALL INCLUDE THE FOLLOWING:

1. AUTOMATIC IRRIGATION CONTROLLER USING ET OR SOIL MOISTURE SENSOR DATA AREA REQUIRED.

- 1.1. LANDSCAPE WATER METERS (DEDICATED OR PRIVATE) SHALL BE INSTALLED FOR ALL NON-RESIDENTIAL LANDSCAPE OF 1,000 SQUARE FEET BUT NOT MORE THAN 5,000 SQUARE FEET OR GREATER.
- 1.2. RESIDENTIAL OVER 5,000 SQUARE FEET.
- RAIN, FREEZE AND WIND SENSORS ARE REQUIRED, AS NEEDED FOR LOCAL CLIMATE.
- FLOW SENSORS THAT DETECT HIGH FLOW ARE REQUIRED FOR ALL NON-RESIDENTIAL LANDSCAPES AND RESIDENTIAL 5,000 SQUARE FFFT
- 4. PRESSURE REGULATING DEVICES ARE REQUIRED. LOW FLOW WILL NEED BOOSTER.
- CHECK VALVE AND ANTI-DRAIN VALVES ARE REQUIRED WHERE LOW HEAD DRAINAGE COULD OCCUR.
- NO OVERHEAD IRRIGATION WITHIN 24 INCHES OF ANY NON-PERMEABLE SURFACE.
- 7. LOW VOLUME (DRIP) IRRIGATION IS REQUIRED ON MULCHED PLANTING AREAS.
- 8. AREAS LESS THAN 10 FEET IN WIDTH IN ANY DIRECTION MUST BE IRRIGATED WITH SUBSURFACE IRRIGATION OR ANOTHER MEANS THAT PRODUCES NO RUNOFF.
- 9. ALL SPRINKLER HEADS MUST DOCUMENT A LOWER QUARTER
- DISTRIBUTION UNIFORMITY (DULQ) OF 65% OR HIGHER.
- 10. EMISSION DEVICES MUST HAVE MATCHED PRECIPITATION RATES.11. SOIL MANAGEMENT REPORT THAT INCLUDES SOIL ANALYSIS: TEXTURE, INFILTRATION RATE, PH, SOLUBLE SALTS, SODIUM, % ORGANIC,

#### **SOIL PREPARATION:**

RECOMMENDATIONS.

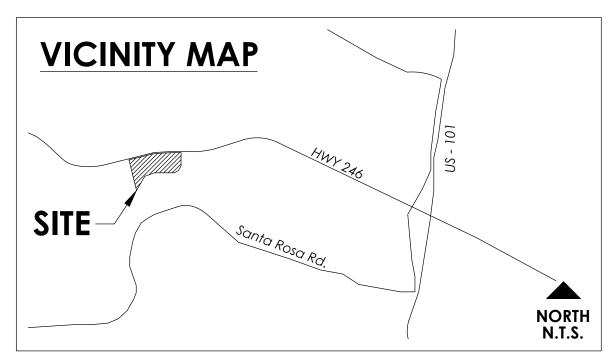
- 1. PRIOR TO PLANTING COMPACTED SOIL SHALL BE TRANSFORMED TO A FRIABLE CONDITION.
- 2. INSTALLATION: COMPOST AT A MINIMUM RATE OF FOUR CUBIC YARDS PER 1,000 SQUARE FEET OF PERMEABLE AREA SHALL BE INCORPORATED TO A DEPTH OF 6 INCHES INTO SOIL.

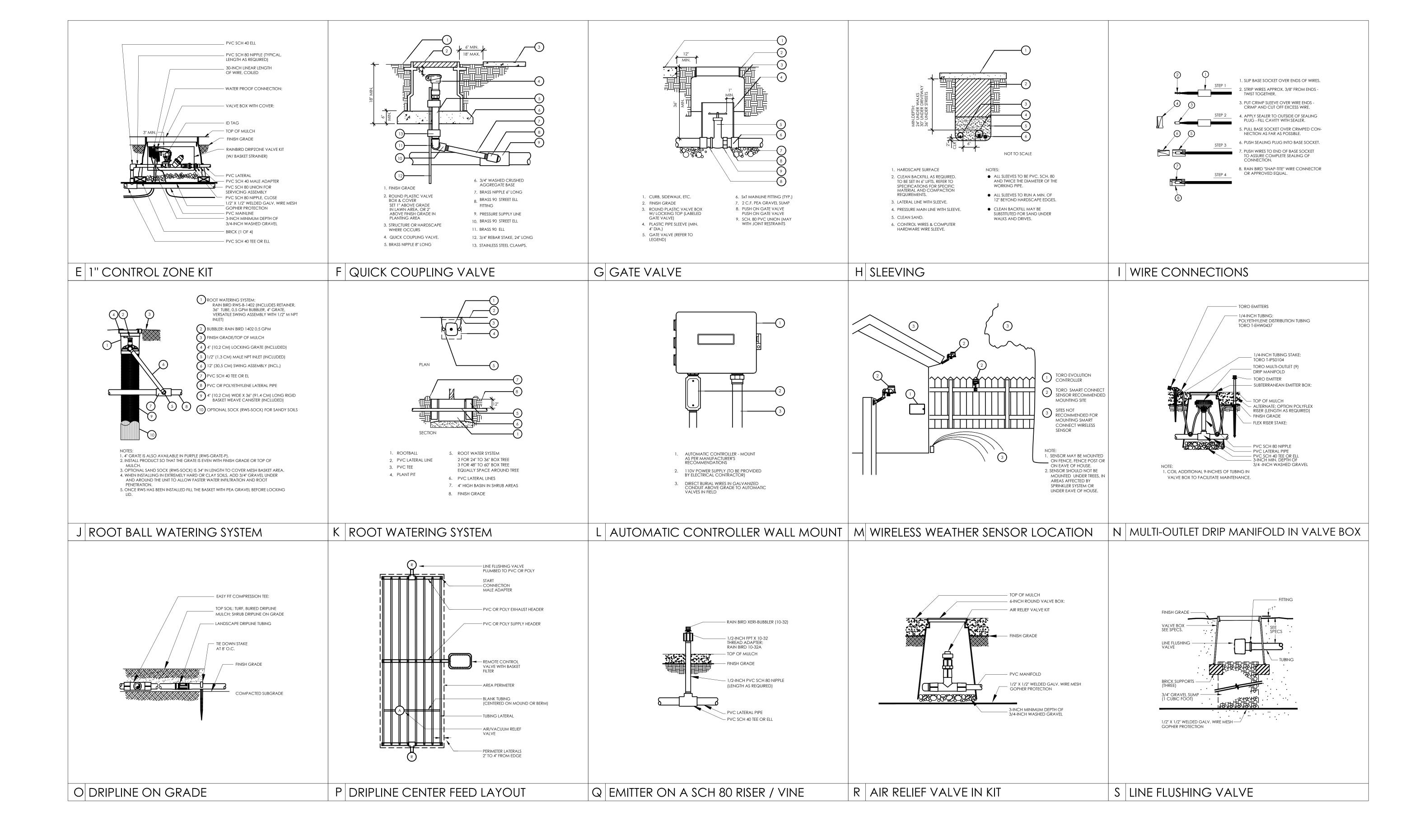
#### IRRIGATION AUDITS:

 LANDSCAPE AUDITS SHALL NOT BE CONDUCTED BY THE PERSON WHO DESIGN OR INSTALLED THE LANDSCAPE AND CONDUCTED IN A MANNER CONSISTENT WITH THE IA LANDSCAPE IRRIGATION AUDIT OR "WATERSENSE" LABELING AUDIT BY USEPA. 2. CERTIFICATE OF COMPLETION SUBMITTED TO LOCAL AGENCY FOR APPROVAL.





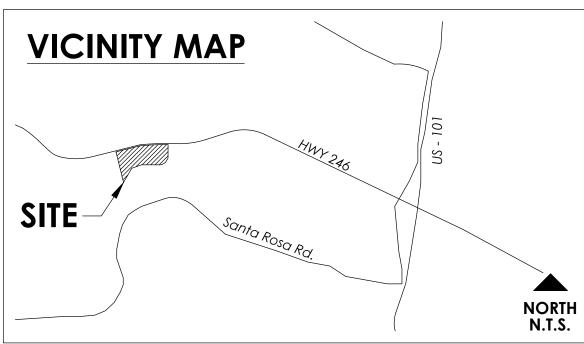






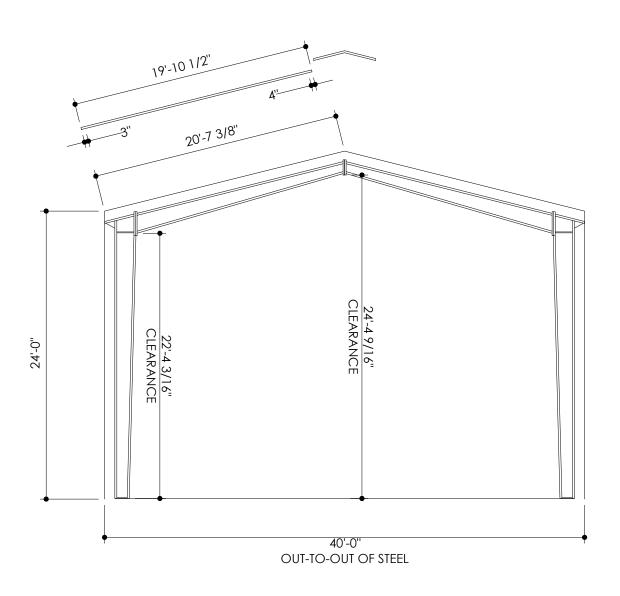
203 Lightning St., Suite 201 // Santa Maria, CA 93455 805.349.9695 // www.pleinairedg.com 2019.10.22





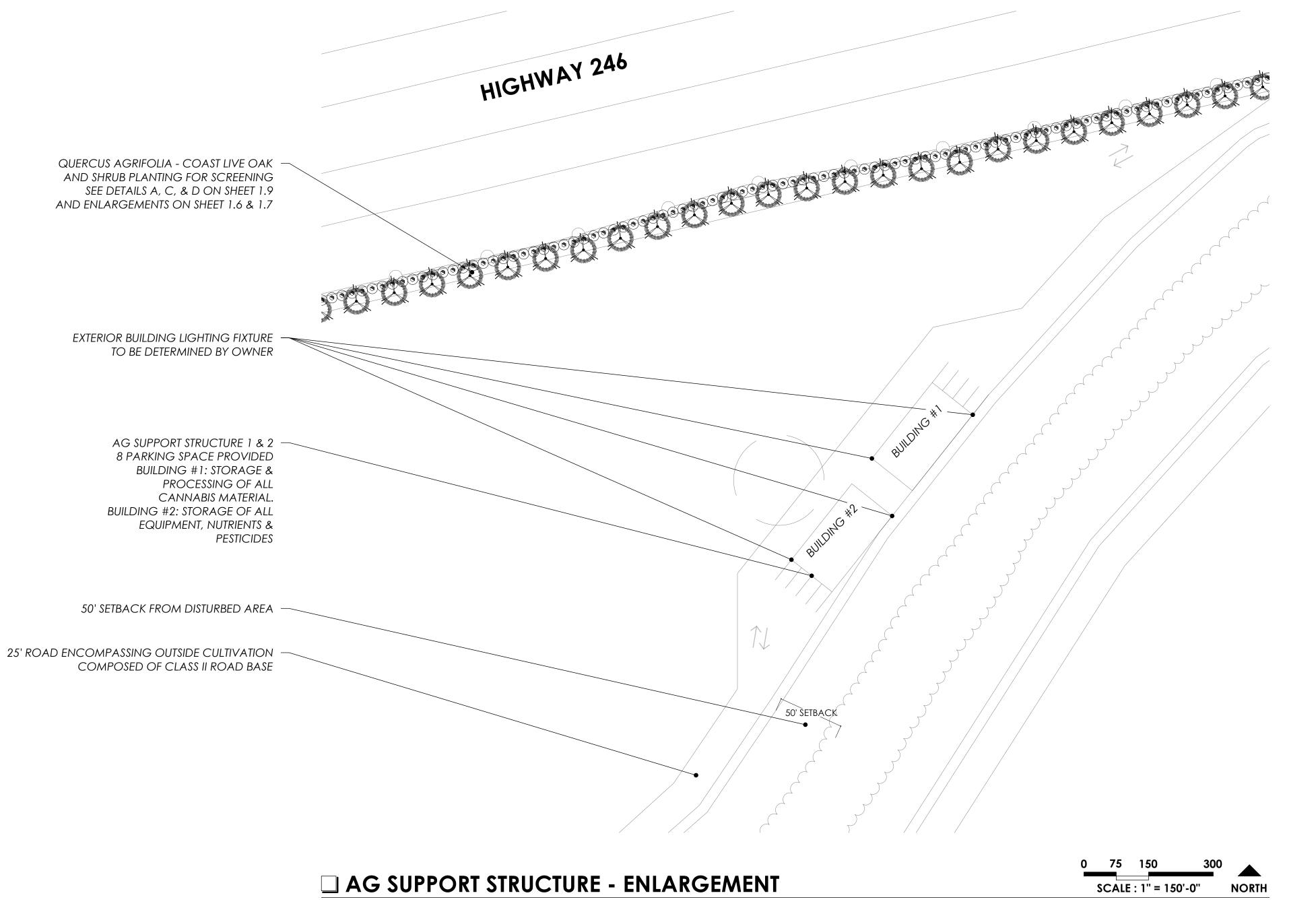
☐ AG SUPPORT STRUCTURE - FLOOR PLAN

SCALE: 1" = 8'-0"



☐ AG SUPPORT STRUCTURE - ELEVATION

SCALE: 1" = 8'-0"



STRUCTURE BY OTHER. REFERENCE STRUCTURE SHEETS FOR MORE INFO.

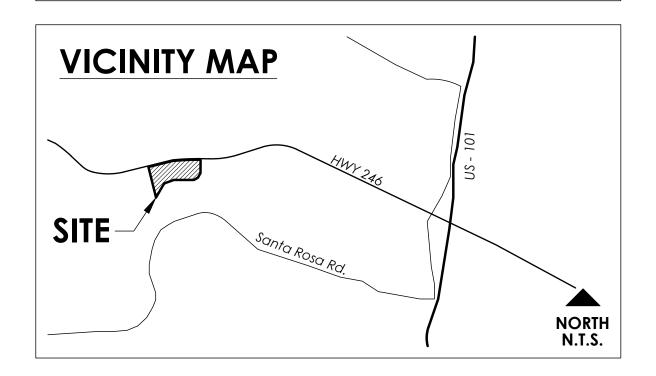
NOTE: STEEL AG SUPPORT

SITE MAP SITE-

■ BUILDING NOTES

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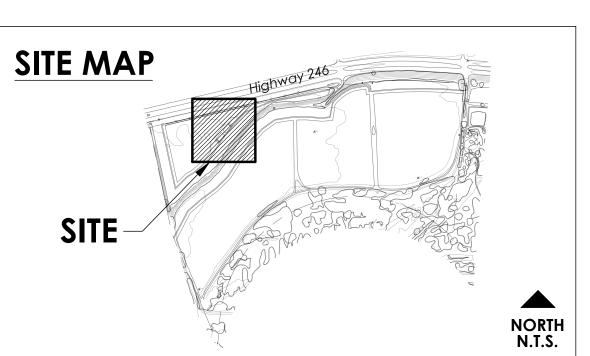


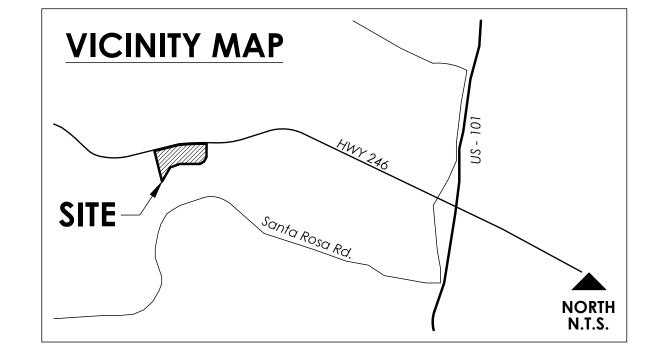




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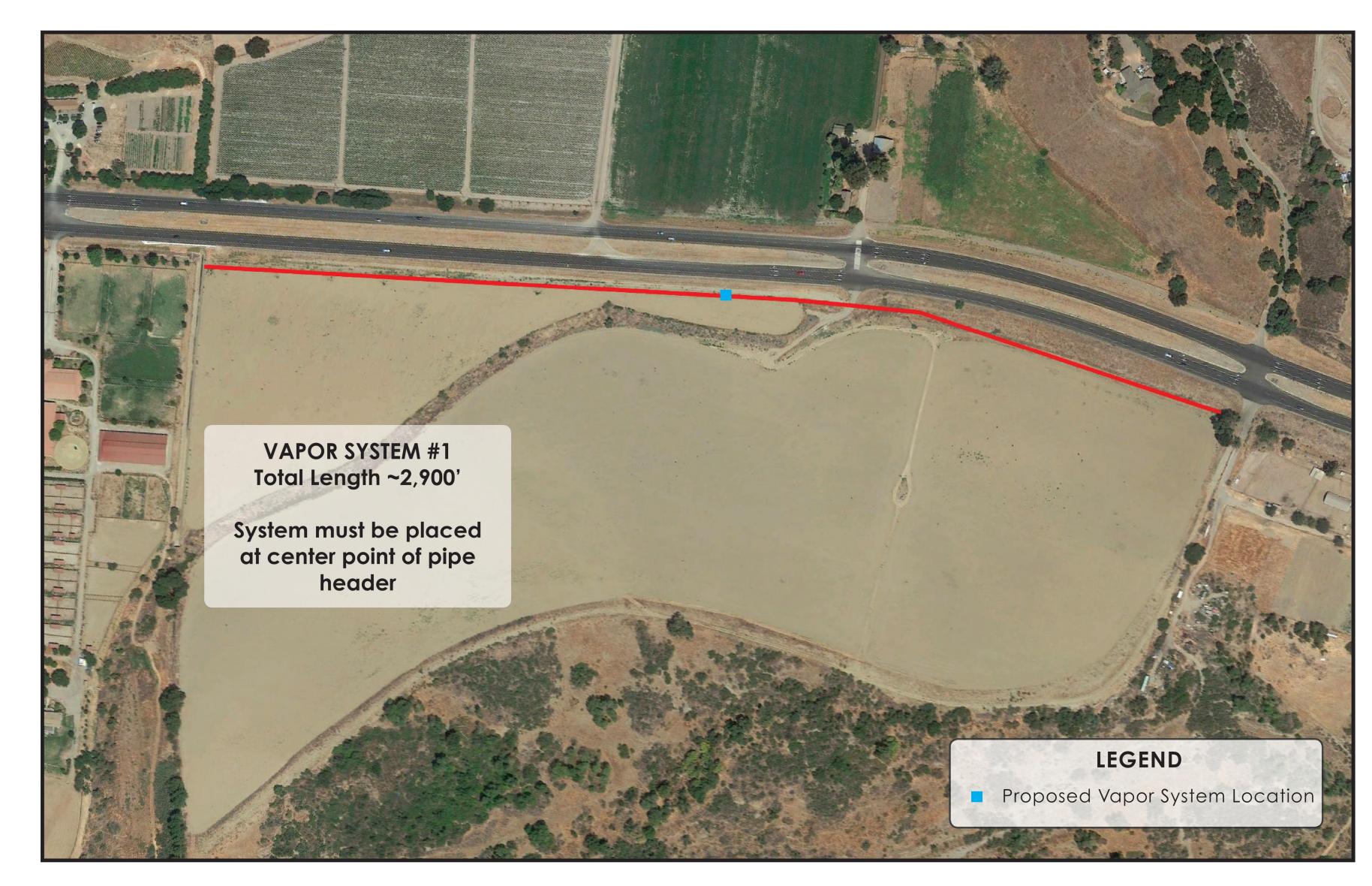






PROPOSED 6" PVC D2729 LAYOUT

1800 W HIGHWAY 246 BUELLTON, CA 93427



2332 W. Industrial Park Drive · Bloomington, IN 47404 USA

www.byers-scientific.com



2332 W. Industrial Park Drive Bloomington, IN 47404 Ph: (812) 269-6218



### **KEY FEATURES:**

- Patent-pending Uniform Vapor-Distribution Technology ensures that a consistent and controllable level of product is dispersed via the perimeter piping
- Remote monitoring 24/7 by Byers Scientific staff on status of all machine operating parameters
- Rugged weather resistant enclosure capable of withstanding prolonged exposure to wind, rain and other elements
- UL Listed control panel is designed for site specific electrical requirements (e.g. 480 VAC, 3 Phase)
- Air filter replacement can be done safely from outside, no need to open/unlock
- Product reservoir tank provides up to three weeks of uninterrupted operation before needing refill

- Key personnel receive email/SMS text notifications alerting of machine needs such as low tank level or air filter replacement
- Operational data are logged to provide evidence of compliance to local/state/ federal agencies
- Optional weather station fully integrated with SCADA system available
- Utilizes Ecosorb® 607, a proprietary blend from OMI Industries that is specifically formulated for use in BS&M equipment
- Each system is custom designed and engineered for a client's site-specific characteristics
- Interior access via lockable 120-degree angle, gas assisted door for general machine maintenance such as product tank filling

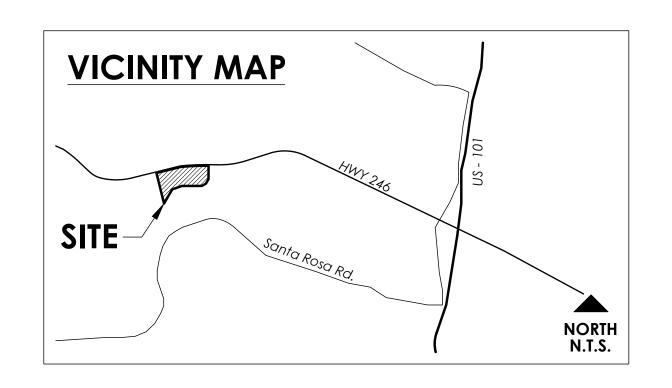
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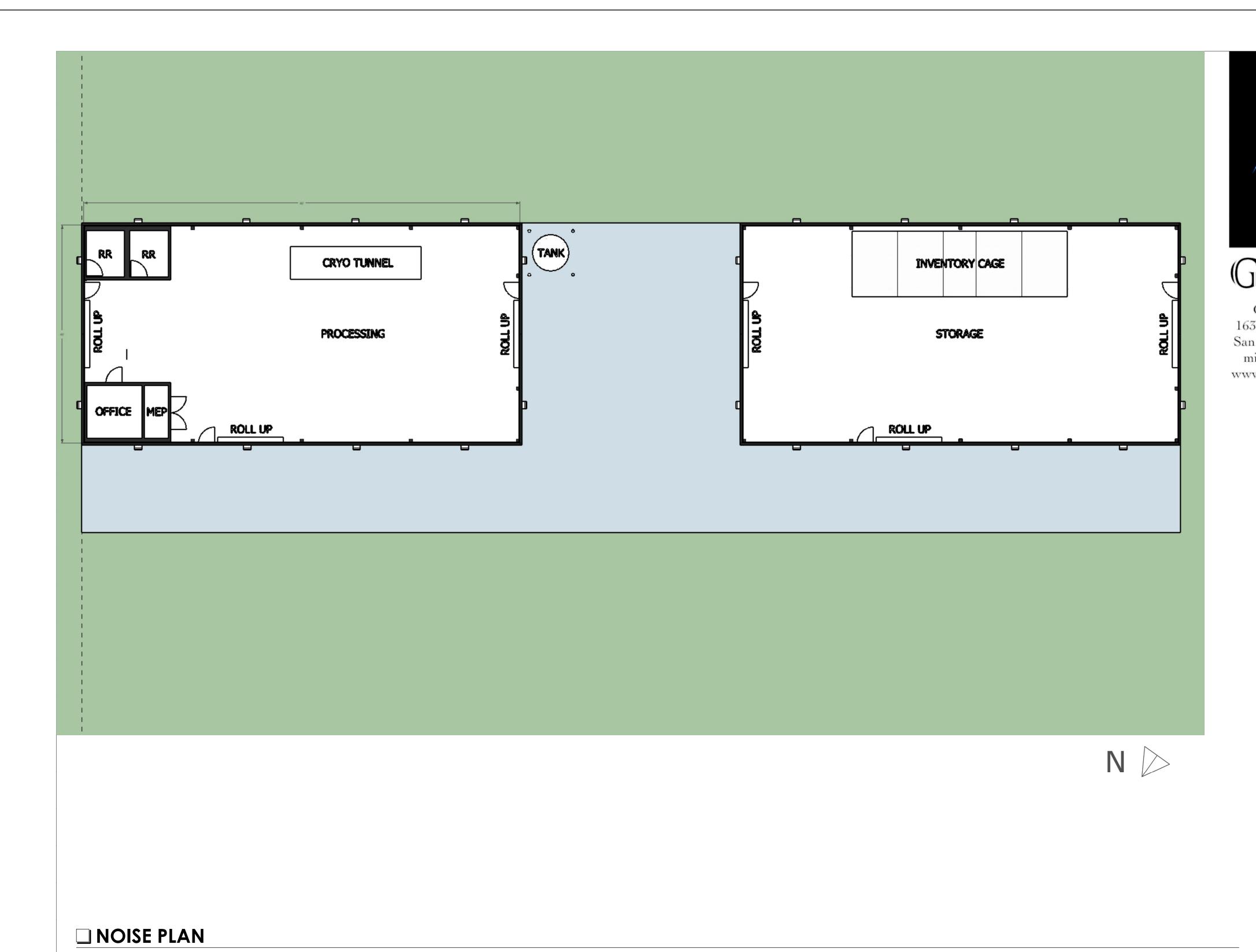
**☐** ODOR ABATEMENT SYSTEM

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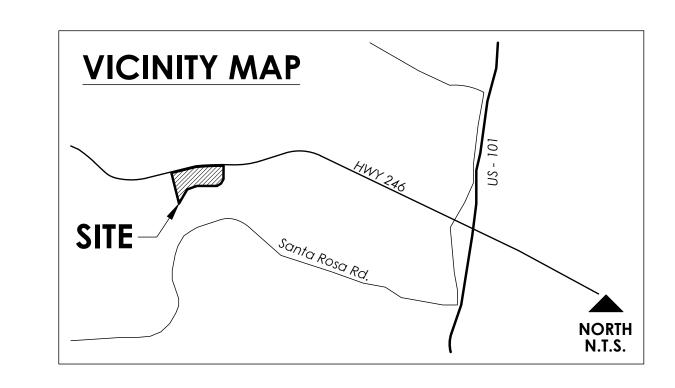
**NOTE:** THE NOIS'E PLAN SHALL DEMONSTRATE COMPLIANCE WITH THE FOLLOWING STANDARDS:

- a. BUILDING SHALL BE ADEQUATELY SOUNDPROOF SO THAT INTERIOR NOISE SHALL NOT EXCEED 65 DECIBELS BEYOND THE PROPERTY. THE PLAN SHALL IDENTIFY NOISE-GENERATING EQUIPMENT THAT WILL BE USED AND THE NOISE LEVEL ASSOCIATED WITH EACH.
- b. ENVIRONMENTAL CONTROL SYSTEMS SHALL BE LOCATED AND/OR SHIELDED TO AVOID GENERATING NOISE LEVELS ABOVE 65 DECIBELS HEARD BY SENSITIVE RECEPTORS, IN COMPLIANCE WITH THE SANTA BARBARA COUNTY NOISE ELEMENT.
- c. N/A
- d. THE COMBINED DECIBEL LEVEL FOR ALL NOISE SOURCES, AS MEASURED AT THE PROPERTY LINE OF THE LOT ON WHICH CANNABIS ACTIVITY IS LOCATED, SHALL NOT EXCEED 65 DECIBELS.
- e. THE USE OF GENERATORS FOR CULTIVATION IS PROHIBITED, EXCEPT FOR TEMPORARY USE IN THE EVENT OF A POWER OUTAGE OR EMERGENCY. THE NOISE PRODUCED BY A GENERATOR SHALL NOT BE AUDIBLE BY HUMANS FROM NEIGHBORING RESIDENCES.

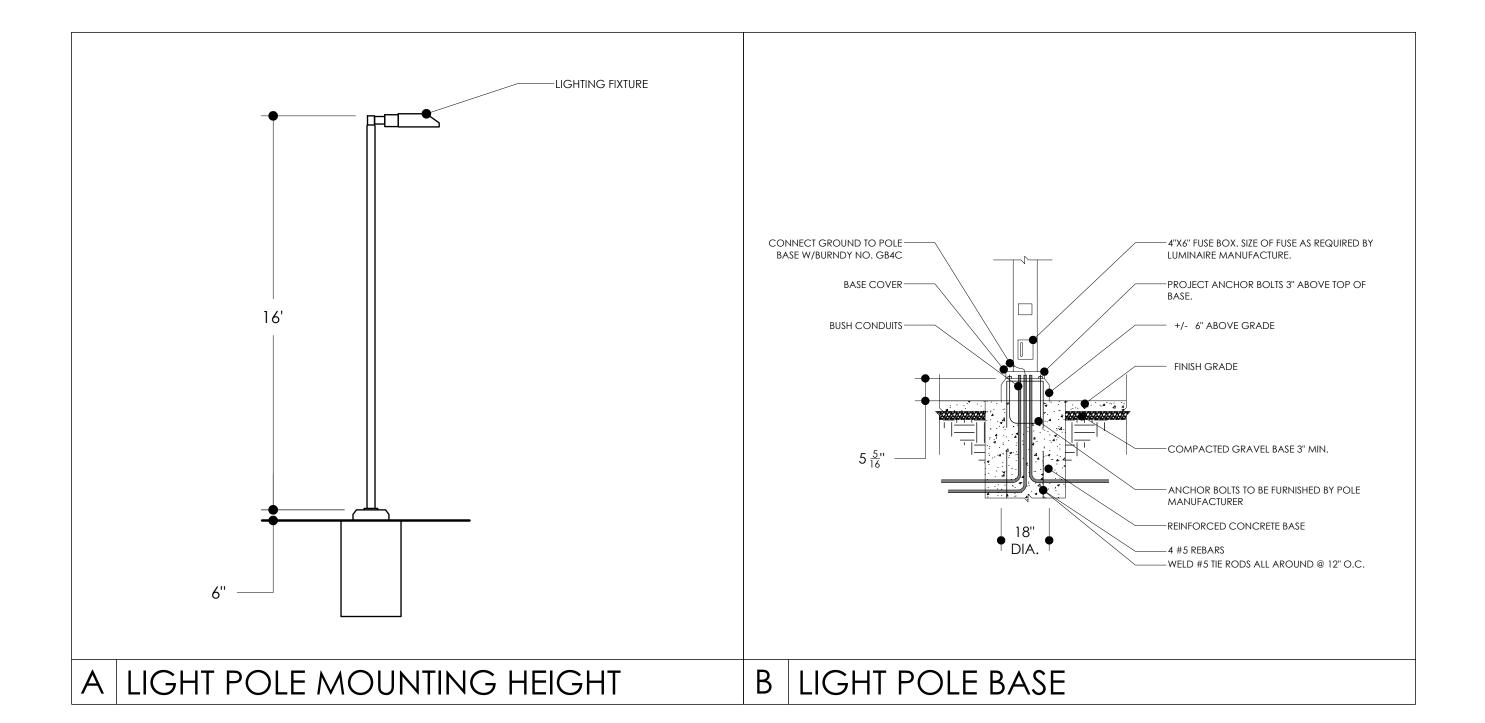
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1800 WEST HIGHWAY 246 // BUELLTON, CALIFORNIA 93427









#### WATER EFFICIENT LANDSCAPE WORKSHEET

Project:	1800 W High	hway 246, Buellto	n CA				
Hydrozone # /Planting Description a	Plant Factor (PF)	Irrigation Method b	Irrigation Effciency (IE)c	ETAF (PF/IE)	Landscape Area (sq, ft,)	ETAF x Area	Estimated Total Water Use (ETWU) e
Regular Landscape Are	eas						
Very Low	0.1	drip	0.81	0.12	-	-	-
Low - Screening	0.2	drip	0.81	0.25	30,423.00	7,511.85	212,375.08
Low	0.3	drip	0.81	0.37	-	-	-
Medium	0.5	drip	0.81	0.62	-	-	-
Non-irrigated	0		0.81	-	3,293,481.00	-	-
				Totals	3,323,904.0	7,511.9	212,375.1
Special Landscape Are	as						
Irrigated Crop				1.0	2,237,778.0	2,237,778.00	63,266,459.6
						-	-
						-	-
				nenen enemenen en		-	-
						-	-
				Totals	2,237,778.0	2,237,778.0	63,266,459.6
						ETWU Total	63,478,834.7
Maximum Allowed Wa	ater Allowance	(MAWA)e					77,084,589.0

Hydrozone #/Planting Description Irrigation Method c Irrigation Efficiency overhead spray 0.75 for spray head 1.) front lawn 0.81 for drip or drip 2.) medium water use planting MAWA (Annual Gallons Allowed) ETWU (Annual Gallons Required) = Eto x 0.62 x ETAF x Area = (Eto) ( 0.62) [ (ETAF x LA) + ((1-ETAF) x SLA)] where 0.62 is a conversion factor that converts where 0.62 is a conversion factor acre- inches per acre per year to gallons per square that converts acre-inches per acre foot per year, LA is the total landscape area in per year to gallons per square foot square feet, SLA is the total special landscape area in square feet, and ETAF is .55 for residential areas and 0.45 for non-residential areas.

ETAF Calculations: Average ETAF for Regular Landscape Areas must be 0.55 or below for residential areas, and 0.45 or below for nonresidential areas.

ll Landscape Areas				
tal ETAF x Area (B+D)	2,245,289.85			
tal Area (A+C)	5,561,682.00			
ewide ETAF (B+D) ÷ (A+C)	0.40			

LANDSCAPE AREA CALCS. FOR WATER USE ESTIMATE 1800 W Highway 246

3,293,481 Sq. ft.

8/30/2019

Balance of site undeveloped

(non-irrigated)

3,574,750 Sq. ft. Total area of Site (82 ac) Landscape Screening 30,423 Sq. ft. 2,237,778 Sq. ft. Cultivated area 20% of site built out with roads 281,269 Sq. ft. structures etc.

Water source is by private on site well. Water use is an

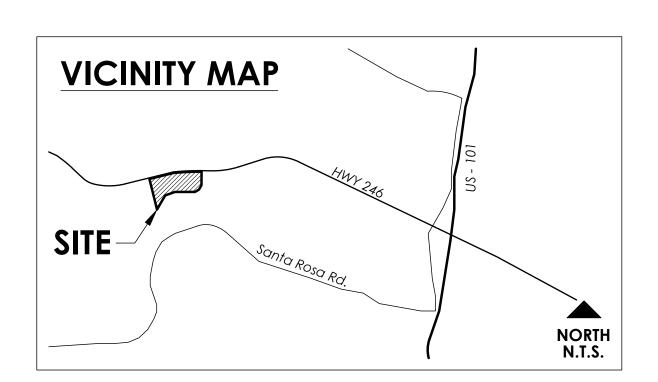
estimate based on information currently avaiable

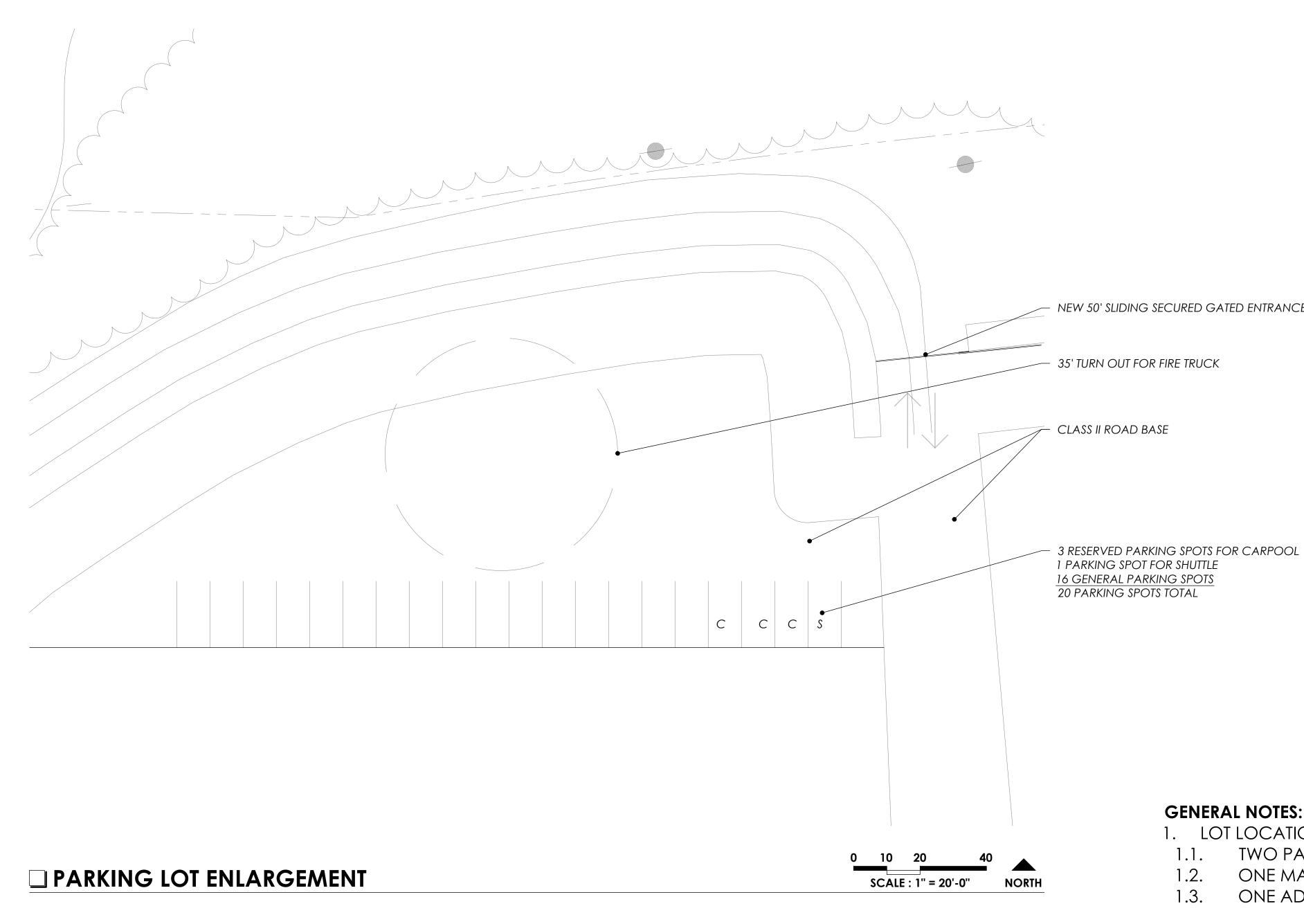
\*The free Adobe Reader may be used to view and complete this form. However, software must be purchased to complete, save, and reuse a saved form. File Original with DWR DWR Use Only - Do Not Fill In Well Completion Report State Well Number/Site Number No. e0263528 Owner's Well Number 4 Latitude Longitude \_\_\_\_ Date Work Ended \_\_\_ Date Work Began 03/13/2015 Local Permit Agency Santa Barbara County Health Department Permit Date 3/16/15 Permit Number WP447 Geologic Log Name Campbell Ranches - SRYTT RANS Drilling Method Mud Rotary Mailing Address P.O. Box 625 Depth from Surface Describe material, grain size, color, etc Sand - soil Gravel & sand Address 1610 W Hwy 246 Clay with gravel \_\_\_ County Santa Barbara Gravel & sand Sandy clay, some gravel APN Book <u>099</u> Page <u>240</u> Parcel <u>067</u> Sandy clay & gravel streaks Location Sketch (Sketch must be drawn by hand after form is print Modification/Repair Planned Uses Water Supply ☑ Domestic ☐ Public ☑ Irrigation ☐ Industrial O Cathodic Protection Dewatering O Heat Exchange O Injection O Test Well □ Well Construction Diagram ☐ Geophysical Log(s) ☐ Soil/Water Chemical Analyses Other \_\_\_ IF ADDITIONAL SPACE IS NEEDED, USE NEXT CONSECUTIVELY NUMBERED FORM

☐ DETAILS & NOTES

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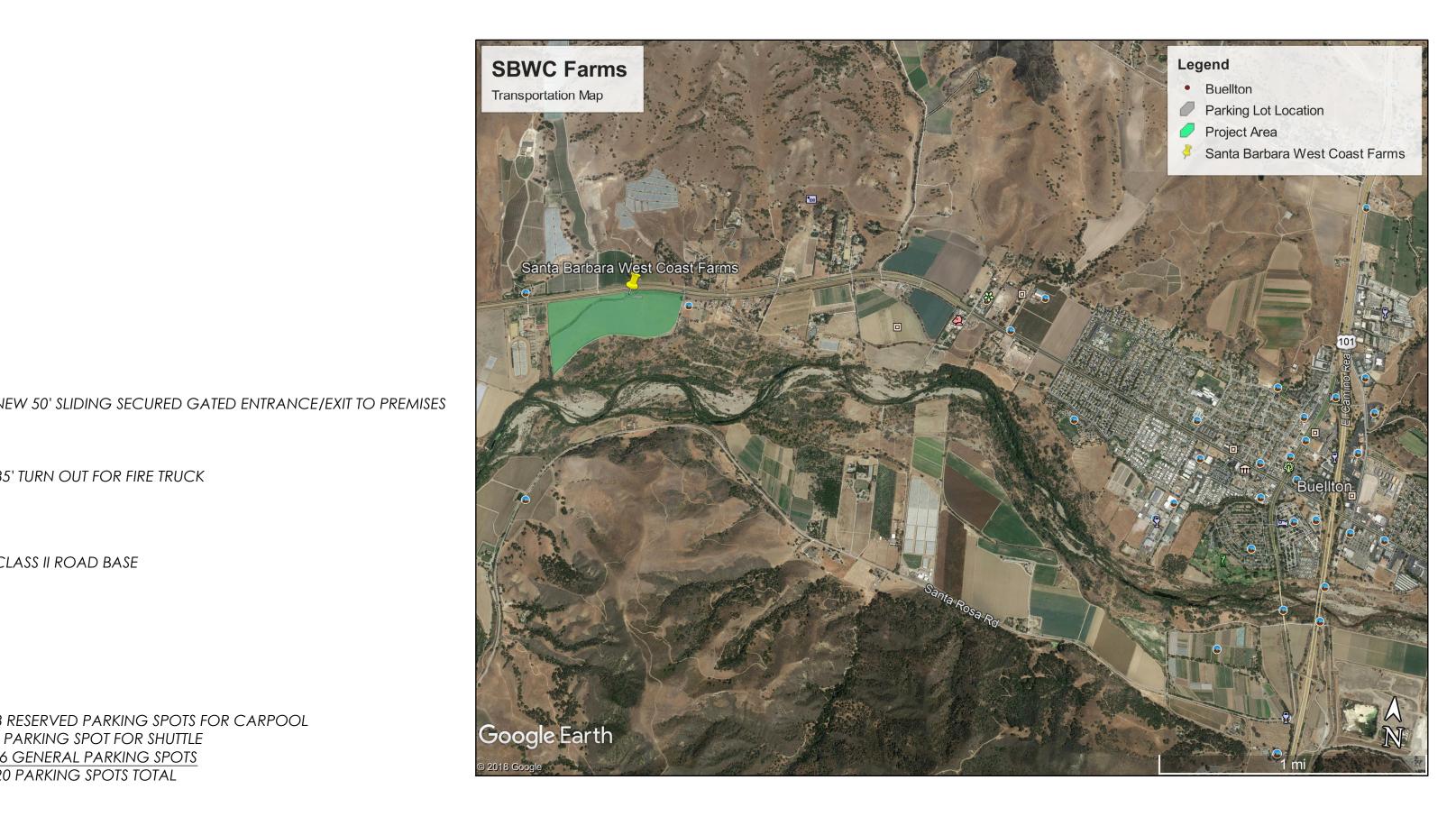






#### TRANSPORTATION ROUTE NOTES:

ALL TRAFFIC LEAVES AND ARRIVES VIA A DRIVEWAY CONNECTED DIRECTLY TO CA-246



## ☐ TRANSPORTATION ROUTE MAP

### TRANSPORTATION ROUTE NOTES:

ALL TRAFFIC LEAVES AND ARRIVES VIA A DRIVEWAY CONNECTED DIRECTLY TO CA-246

### **GENERAL NOTES:**

- 1. LOT LOCATION
- TWO PARKING AREAS ON SITE CONSTRUCTED WITH CLASS II ROAD BASE
- ONE MAIN PARKING LOT WITH 20 PARKING SPOTS, 3 RESERVED FOR CARPOOL, ONE FOR SHUTTLE PARKING
- ONE ADDITIONAL PARKING AREA NEAR ACCESSORY STRUCTURES WITH 8 PARKING SPOTS
- 2. TOTAL NUMBER OF EMPLOYEES
- 10 FULL TIME CULTIVATION STAFF ON SITE DURING CULTIVATION SEASON
- ADDITIONAL 10-20 TEMP LABORERS BROUGHT IN FOR TRANSPLANTING, HARVESTING, & PROCESSING ACTIVITIES
- 3. HOURS OF OPERATION
- 3.1. 6:00 AM 3:00 PM DAILY
- 4. TRIP ORIGINS & DESTINATIONS
- 4.1. LABOR COMES FROM SURROUNDING AREAS VIA CA-246
- 4.2. HARVESTED CANNABIS PROCESSED ON-SITE THEN SENT TO CA TYPE-7 VOLATILE MANUFACTURING FACILITY IN SAN DIEGO VIA US-101 AND I-5 SOUTH.
- 5. VEHICLE USAGE
- 5.1. DURING HARVEST SEASON, ONE VEHICLE PER DAY SHALL BE USED FOR TRANSPORTING CANNABIS
- 5.2. VEHICLE SIZE RANGING FROM A SPRINTER TO FULL-SIZE TRUCK (40-FOOT CONEX)

### ☐ TRANSPORTATION DEMAND MANAGEMENT PLAN

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