Section 3.2
Agricultural Resources

3.2.1 Introduction

This section provides a discussion of the existing agricultural resources in the County of Santa Barbara (County), as well as the applicable regulations pertaining to the proposed Cannabis Land Use and Licensing Program (Project). Potential Project impacts are evaluated, and where applicable, mitigation measures are proposed. Proposed Project standards and regulations that address environmental resources are also described. Key resources and data used in the preparation of this section include the Santa Barbara County Comprehensive Plan Agricultural and Land Use Elements, Santa Barbara County Code (County Code), U.S. Natural Resources Conservation Service (NRCS) Soil Survey Maps, Farmland Monitoring and Mapping Program (FMMP) maps, County geographic information system (GIS) data, and the 2017 Cannabis Registry data that the County collected to inform the analysis of the Project.

3.2.2 Environmental Setting

The County has a mild Mediterranean climate with an average rainfall between 8 and 36 inches (depending on the region) and over 300 days of sunshine per year, as well as a variety of soils that facilitate ideal conditions and long growing seasons for a diversity of agricultural crops. The County’s inland topography of mountain ranges and inter-mountain valleys allow for cool ocean air to flow inland, creating moderate temperatures conducive to high value crops such as premium wine grapes and subtropical fruits.

Agriculture is the number one contributor to the County’s economy, contributing approximately $2.8 billion to the local economy and providing 25,370 jobs. Agricultural commodities produced a gross production value of $1.43 billion in 2016, with the highest producing crops consisting of strawberries ($414 million), wine grapes ($152 million), broccoli ($149 million), nursery products ($79 million), cut flower ($75 million), and head lettuce ($76 million). Through a multiplier effect, County agriculture has an estimated local economic impact in excess of $2.8 billion (County of Santa Barbara 2016). (See Table 3.2-1.)

The County’s agricultural production primarily occurs on approximately 705,378 acres of agricultural lands, including 67,201 acres of prime farmland, 12,998 acres of farmland of statewide importance, 36,574 acres of unique farmland, and 9,720 acres of local importance under the Farming Mapping and Monitoring Program [FMMP]1 (California Department of Conservation [DOC] 2014). (See Tables 3.2-2 and 3.2-3.) Of the total County acreage eligible under the Project (671,023 acres), approximately

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1 The FMMP assesses the location, quality and quantity of agricultural lands and monitors the conversion of these lands to nonagricultural uses. The FMMP classifies important farmland based on agricultural soil quality and current land use into four categories of important farmlands: prime farmland, farmland of statewide importance, unique farmland, and farmland of local importance. Important farmlands contain soils best suited for producing food and forage, particularly for producing high-yield crops.
513,470 acres (76.5 percent) are enrolled in Land Conservation Act contracts (Williamson Act; Department of Conservation 2010). A substantial amount of agricultural lands (578,885 acres) are also non-irrigated grazing and pasture lands where the prevalence of steep slopes, and less fertile, dryer lands may limit their agricultural use (Department of Conservation 2010). While grazing land makes up the bulk of the agricultural acreage in the County, irrigated crops produce the greatest value. The County’s agricultural industry continues to grow and change over time with trends of converting grazing lands to more intensive farming uses with higher value irrigated crops.

**Table 3.2-1. Summary of Agricultural Production in Santa Barbara County (2016)**

<table>
<thead>
<tr>
<th>Agricultural Production/Crop</th>
<th>Harvested Acreage¹</th>
<th>Production Value²</th>
<th>Percentage of Total Production Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fruit and Nuts</td>
<td>18,436</td>
<td>$546,727,621</td>
<td>38.3</td>
</tr>
<tr>
<td>Vegetables</td>
<td>67,309</td>
<td>$515,397,033</td>
<td>36.1</td>
</tr>
<tr>
<td>Wine Grapes</td>
<td>21,349</td>
<td>$151,629,764</td>
<td>10.6</td>
</tr>
<tr>
<td>Nursery Products</td>
<td>383</td>
<td>$78,911,967</td>
<td>5.5</td>
</tr>
<tr>
<td>Cut Flower &amp; Cut Foliage</td>
<td>857</td>
<td>$75,040,786</td>
<td>5.3</td>
</tr>
<tr>
<td>Livestock and Poultry</td>
<td>N/A</td>
<td>$31,804,415</td>
<td>2.2</td>
</tr>
<tr>
<td>Field &amp; Seed Crops</td>
<td>598,304</td>
<td>$19,487,436</td>
<td>1.4</td>
</tr>
<tr>
<td>Dairy and Apiary Products</td>
<td>N/A</td>
<td>$7,665,047</td>
<td>0.5</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>712,823</strong></td>
<td><strong>$1,426,664,069</strong></td>
<td><strong>100.0</strong></td>
</tr>
</tbody>
</table>

¹Harvested acreage is not reflective of land area, but of acres harvested where in some cases, crops may be harvested more than once per year. Vineyards and orchards not yet producing are not included in the harvested acreage.

²Represented as gross values.

Source: County of Santa Barbara 2016.

**Table 3.2-2. Summary of County Agricultural Lands within the Project Eligible Area**

<table>
<thead>
<tr>
<th>County Region</th>
<th>Total Agricultural land under FMMP¹ (acres)</th>
<th>Total land zoned for Agriculture AG-I and AG-II² (acres)</th>
<th>Williamson Act Contracts (acres)</th>
<th>Number of Existing Cannabis Activity Sites</th>
</tr>
</thead>
<tbody>
<tr>
<td>Santa Maria</td>
<td>134,661</td>
<td>147,079</td>
<td>95,130</td>
<td>12</td>
</tr>
<tr>
<td>Lompoc</td>
<td>202,390</td>
<td>151,725</td>
<td>118,779</td>
<td>34</td>
</tr>
<tr>
<td>Santa Ynez</td>
<td>164,411</td>
<td>185,940</td>
<td>131,649</td>
<td>30</td>
</tr>
<tr>
<td>Cuyama</td>
<td>175,621</td>
<td>142,851</td>
<td>129,809</td>
<td>16</td>
</tr>
<tr>
<td>South Coast</td>
<td>28,295</td>
<td>41,445</td>
<td>25,792</td>
<td>42</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>705,378</strong></td>
<td><strong>669,041</strong></td>
<td><strong>501,158</strong></td>
<td><strong>134</strong></td>
</tr>
</tbody>
</table>

¹Acreage of total agricultural lands represents lands surveyed by the FMMP and includes prime farmland, farmland of statewide importance, unique farmland, farmland of local importance, and grazing farmland. Total land zoned for agriculture differs from agricultural land, as lands zoned AG-I or AG-II may include built-up land, roads, water, or other non-cultivation uses.

Sources: California Department of Conservation 2014; County of Santa Barbara Assessor’s Office 2016.

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²A Williamson Act contract is an agreement between private landowners and the government to preserve specific parcels of land in agricultural or related open space uses in return for reduced property tax assessments (refer to Section 3.2.3, Regulatory Setting, for additional discussion).
Table 3.2-3. Summary of County FMMP Lands

<table>
<thead>
<tr>
<th>FMMP Designation</th>
<th>Santa Maria</th>
<th>Lompoc</th>
<th>Santa Ynez</th>
<th>Cuyama</th>
<th>South Coast</th>
</tr>
</thead>
<tbody>
<tr>
<td>Farmland of Local Importance</td>
<td>1,114</td>
<td>3,384</td>
<td>4,052</td>
<td>1,090</td>
<td>81</td>
</tr>
<tr>
<td>Farmland of Statewide Importance</td>
<td>8,156</td>
<td>1,199</td>
<td>929</td>
<td>2,116</td>
<td>597</td>
</tr>
<tr>
<td>Grazing Land</td>
<td>80,013</td>
<td>181,858</td>
<td>146,801</td>
<td>154,712</td>
<td>15,502</td>
</tr>
<tr>
<td>Prime Farmland</td>
<td>27,897</td>
<td>13,169</td>
<td>7,489</td>
<td>15,500</td>
<td>3,147</td>
</tr>
<tr>
<td>Unique Farmland</td>
<td>17,482</td>
<td>2,781</td>
<td>5,140</td>
<td>2,203</td>
<td>8,968</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>134,661</strong></td>
<td><strong>202,390</strong></td>
<td><strong>164,411</strong></td>
<td><strong>175,620</strong></td>
<td><strong>28,295</strong></td>
</tr>
</tbody>
</table>

1Acreage of total agricultural lands represents lands surveyed by the FMMP and includes prime farmland, farmland of statewide importance, unique farmland, farmland of local importance, and grazing farmland.

2Total land zoned for agriculture differs from agricultural land, as lands zoned AG-I or AG-II may include built-up land, roads, water, or other non-cultivation uses.

Source: County of Santa Barbara Assessor's Office 2016.

With nearly 93 percent of the County zoned for agricultural uses, 712,823 acres of harvested agricultural acreage in 2016, and approximately 25,370 jobs, Santa Barbara County is considered a predominantly agricultural county. Additionally, the presence of farms and ranches has been deemed to yield significant aesthetic and economic benefits to the residents of the County (County of Santa Barbara 1989). Many of the lands within the County which are currently under some form of agriculture are developed with standard commercial agricultural operations, which include irrigated and fallow cropland, nurseries, vineyards, greenhouses, pasture and grazing land, and orchards, as well as industry agricultural development such as wineries, distilleries, and food processing facilities. Compared to the existing amount of agricultural operations within the County, the known amount of existing cannabis activities represents less than 0.06 percent of the harvested agricultural acreage in 2016. However, due to its high profit margins, annual revenue from cannabis may account for a significant portion of the annual yield from commercial agricultural commodities, though this yield may not currently be captured in the County’s agricultural economy due to the lack of tax revenue and historically unregulated nature of the industry. Therefore, with regards to revenue from both legal medical marijuana and illegal cannabis operations, it is difficult to predict its status due to uncertainty in the extent of operations and current market value for cannabis products. With regard to cannabis, many of the processes involved in the cultivation, processing, manufacturing, distribution, or sale of cannabis are not dissimilar from other agricultural operations that currently occur throughout the County and state.

Agricultural Productivity within Santa Barbara County Regions

Santa Maria Region

The Santa Maria Region is an area of intensive row crop cultivation and contains the largest amount of important farmland in the County, including the largest concentration of prime lands (17,482 acres). Over half of the County’s agricultural production value is produced in this region, producing the majority of the County’s high yield crops, including strawberries, broccoli, lettuce, and celery. The hills to the south and east of the valley are primarily used for vineyards and cattle grazing, though a few select locations in the same areas currently engage in cannabis cultivation. While 147,079 acres are designated for agricultural land within the region, 95,130 acres are enrolled under Williamson Act contracts, equating to approximately 65 percent of the region’s agricultural lands.
Santa Barbara County Farmland

LEGEND
- Santa Barbara County Boundary
- Coastal Zone Boundary
- Incorporated City
- Vandenberg Air Force Base
- Los Padres National Forest
- Farmland
  - Prime
  - Unique
  - State Importance
  - Local Importance
- Grazing

Source: California Farmland Mapping and Monitoring Program (FMMP)

FIGURE 3.2-2
Lompoc Region

The Lompoc Valley contains 13,169 acres of prime farmlands associated with the Santa Ynez River watershed. Principal crops produced in this region include artichokes, flowers, beans, and walnuts. The hilly topography of the Santa Rita Hills supports vineyards and cattle grazing, and the hills to the northeast and southeast of the incorporated areas support cannabis cultivation operations. While 151,725 acres are designated for agricultural land within the region, approximately 118,779 acres are under Williamson Act contracts, equating to approximately 78 percent of the region's agricultural lands.

Santa Ynez Region

The Santa Ynez Region is the region with the largest amount of land zoned for agricultural uses in the County, comprising 185,940 acres of agricultural lands, and is recognized as a major cattle grazing and winery region. (See Table 3.2-2.) The valley floor sustains vineyards, fruit orchards, row crops and grain fields, while the hills along the valley's edges are filled with vineyards and cattle grazing. Much of the agricultural production occurs on the 7,489 acres of prime farmlands surrounding the developed communities and along the Santa Ynez River. Similarly, known cannabis activity sites within this region are primarily dispersed on properties located along Highway 246 within AG-I and AG-II zoned lands, and select sites near the San Antonio Creek watershed near Los Alamos. Growing tourism and residential popularity of this region has also led to conflicts with agricultural resources with resulting from the expansion of ranchette, residential, and visitor-serving commercial land uses (County of Santa Barbara 2009). Approximately 131,649 acres of land in the valley are enrolled under Williamson Act contracts, equating to approximately 71 percent of the region's agricultural lands.

Cuyama Region

The Cuyama Valley has a distinct micro-climate that differs from the rest of the County, with hot dry summers and winters with below freezing temperatures, underlain by the critically overdrafted Cuyama Valley Groundwater Basin (County of Santa Barbara 2012). Agricultural activity in the Cuyama Valley consists primarily of irrigated row crops in level or gently sloping areas, with livestock grazing in foothill areas. Agriculture land uses are dominant within the region, comprising approximately 142,851 acres in the Cuyama Valley, with approximately 15,500 acres of prime farmland, though water availability has notably limited agricultural expansion. Irrigated crops include alfalfa, carrots, deciduous fruit orchards, pistachios, wine grapes, hay/grain, peppers, potatoes, and onions. Rangeland livestock grazing of cattle and calves, sheep, and horses, as well as a small-scale dairy operation also occur in the Cuyama Valley, particularly in foothill areas. Known cannabis activity sites are located along the westernmost edge near Tepusquet Canyon adjacent to the Santa Maria Region, and a singular known site at the easternmost edge of the region. Approximately 129,809 acres of agricultural land are enrolled in Williamson Act contracts in the County Agricultural Preserve Program within this region, equating to approximately 91 percent of the region's agricultural lands.

South Coast Region

The South Coast Region contains 3,147 acres of prime farmlands associated with the Carpinteria Valley and Eastern Goleta Valley areas. The South Coast Region contains extensive tracts of agricultural lands along the coast from Goleta to Carpinteria, bordering urban areas and more rural agricultural regions located along the Gaviota Coast and within the Santa Ynez Mountain foothills. Approximately 25,792 acres of agricultural land are enrolled in Williamson Act contracts in the
The eastern-most portions of this region surrounding the City of Carpinteria supports the only mapped greenhouse district of the County, comprising the largest and most concentrated agricultural greenhouse area of the County. Within Carpinteria Valley (east of Nidever Road), there are 449 acres of greenhouse-type structures, including hoop structures and shade structures. Of those, 333 acres are what are considered “true” greenhouses (pursuant to the County definition), 61 acres are hoop structures, and 58 acres are shade structures. All greenhouse-type structures in the Carpinteria Valley are within the AG-I zoning district. Within Williamson Act land, there are a total of 122 acres of greenhouse-type structures within the Carpinteria Valley, comprising approximately 27 percent of the total amount of Carpinteria greenhouses. Of those, 52 acres are greenhouses, 45 acres are hoop structures, and 26 acres are shade structures (County of Santa Barbara 2017).

3.2.3 Regulatory Setting

The agricultural resources analysis was conducted in conformance with the goals and policies of state and local regulations, as discussed below.

3.2.3.1 State

California Department of Conservation, Division of Land Resource Protection

The California Department of Conservation established the FMMP in 1982 to assess the location, quality, and quantity of agricultural lands and analyze the conversion of these lands throughout California. The list below provides a comprehensive description of all the California Department of Conservation mapping categories (California Department of Conservation 2010).

- **Prime Farmland.** Farmland that has the best combination of physical and chemical features and is able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to sustain high yields. Land must have been used for irrigated agricultural production at some time during the 4 years prior to the mapping date.

- **Farmland of Statewide Importance.** Farmland similar to prime farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the 4 years prior to the mapping date.

- **Unique Farmland.** Farmland with lesser quality soil that is used for production of the State’s leading agricultural crops. This land is usually irrigated but may include non-irrigated orchards or vineyards, which are found in some climatic zones in California. Land must have been used for crops at some time during the 4 years prior to the mapping date.

- **Farmland of Local Importance.** Land of importance to the local agricultural economy as determined by each county’s board of supervisors and a local advisory committee.

- **Grazing Land.** Land where existing vegetation is suited to the grazing of livestock. This category was developed in cooperation with the California Cattlemen’s Association, University of California Cooperative Extension, and other groups interested in grazing activities. The minimum mapping unit for Grazing Land is 40 acres.
- **Urban and Built-up Land.** Land occupied by structures with a building density of at least 1 unit to 1.5 acres, or about six structures to within a 10-acre parcel. This land is used for; residential, industrial, commercial, institutional, and public administrative purposes; railroad and other transportation yards; cemeteries; airports; golf courses; sanitary landfills; sewage treatment facilities; water control structures; and other developed purposes.

- **Other Land.** Land not included in any other mapping category. Common examples include low-density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry, or aquaculture facilities; strip mines and borrow pits; and water bodies smaller than 40 acres. Vacant and nonagricultural land surrounded by urban development and greater than 40 acres is mapped as Other Land.

### California Land Conservation Act of 1965 (Williamson Act)

The California Land Conservation Act of 1965, commonly referred to as the Williamson Act, is promulgated in California Government Code Section 51200-51297.4. The Williamson Act enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space uses in return for reduced property tax assessments. Specifically, this legislation enables landowners who voluntarily agree to participate in the Williamson Act program, to receive assessed property taxes according to the income-producing value of their property in agricultural use, rather than on the property’s assessed market value.

The Williamson Act program is administered by the California Department of Conservation in conjunction with local governments, which administer the individual contract arrangements with landowners. The landowner commits the parcel to a 10-year “rolling” period wherein no conversion out of agricultural use is permitted. Each year the contract automatically renews unless a notice of non-renewal or cancellation is filed. In return, the land is taxed at a rate based on the actual use of the land for agricultural purposes, as opposed to its unrestricted market value. An application for immediate cancellation can also be requested by the landowner, provided that the proposed immediate cancellation application is consistent with the cancellation criteria stated in the California Land Conservation Act and those adopted by the affected county or city. Non-renewal or immediate cancellation does not change the zoning of the property. Participation in the Williamson Act program is dependent on county adoption and implementation of the program and is voluntary for landowners.

The Williamson Act states that a board or council shall, by resolution, adopt rules governing the administration of agricultural preserves. The rules of each agricultural preserve specify the uses allowed. Generally, commercial agricultural uses are permitted within an agricultural preserve; however, local governments may identify compatible uses permitted with a use permit.

California Government Code Section 51238.1 allows a board or council to deem compatible any use, without conditions or mitigation that would otherwise be considered incompatible. However, this may occur only if that use meets the following conditions:

- The use will not significantly compromise the long-term productive agricultural capability of the subject contracted parcel or parcels on other contracted lands in agricultural preserves.

- The use will not significantly displace or impair current or reasonably foreseeable agricultural operations on the subject contracted parcel or parcels on other contracted lands in agricultural preserves. Uses that significantly displace agricultural operations on the subject contracted parcel or parcels may be deemed compatible if they relate directly to the production of commercial
agricultural products on the subject contracted parcel or parcels or neighboring lands, including activities such as harvesting, processing, or shipping.

- The use will not result in the significant removal of adjacent contracted land from agricultural or open space use.

**California Right to Farm Act (California Civil Code Section 3482.5)**

The California Right to Farm Act (California Civil Code Section 3482.5)—enacted in 1981—provides that a farming activity cannot be a public nuisance if all of the following factors are met:

- The activity is in support of the production of an agricultural commodity;
- The agricultural activity is commercial in nature;
- The activity is conducted “in a manner consistent with proper and accepted customs and standards as established and followed by similar agricultural operations in the same locality;”
- The farming activity must have been in operation for at least 3 years; and
- The farming activity was not a nuisance at the time it began.

The California Right to Farm Act does not require “best management practices” but instead simply allows adherence to “accepted” customs and practices. In addition, the statute specifically states that it prevails over any contrary provision of a city or county ordinance or regulation, but does allow cities and counties to require disclosures to be given to prospective home buyers that a dwelling is near an agricultural operation.

**Farmland Security Zone Act**

The Farmland Security Zone Act was passed by the California legislature in 1999 to ensure that long-term farmland preservation is part of public policy. Under the provisions of this act, a landowner already under a Williamson Act contract can apply for Farmland Security Zone status by entering into a contract with the County. Farmland Security Zone classification automatically renews each year for an additional 20 years. In return, for a further 35 percent reduction in the taxable value of land and growing improvements (in addition to Williamson Act tax benefits), the owner agrees not to convert agricultural land for nonagricultural uses.

### 3.2.3.2 Local

**Santa Barbara County Comprehensive Plan**

The Santa Barbara County Comprehensive Plan provides a framework for development and growth in the County. The Comprehensive Plan’s Agricultural and Land Use Elements, along with local community plans, contain various goals and policies that address agricultural resources, including the preservation and expansion of agricultural land use within the County. Such lands are designated A-I, A-II, or AC by the Land Use Element of the Comprehensive Plan and provide opportunities for a range of commercial agricultural operations.

The policies outline the County’s priority to preserve and, where feasible, expand and intensify agricultural land uses. Agricultural operations are encouraged in areas containing both prime and non-prime soils. Consistency with Comprehensive Plan goals and policies is further discussed in Section 3.9, *Land Use and Planning*. Relevant goals and policies are summarized below.
Agricultural Element

**Goal I:** Santa Barbara County shall assure and enhance the continuation of agriculture as a major viable production industry in Santa Barbara County. Agriculture shall be encouraged. Where conditions allow (taking into account environmental impacts) expansion and intensification shall be supported.

**Policy I.A:** The integrity of agricultural operation shall not be violated by recreational or other non-compatible uses.

**Policy I.B:** The County shall recognize the rights of operation, freedom of choice as to the methods of cultivation, choice of crops or types of livestock, rotation of crops and all other functions within the traditional scope of agricultural management decisions. These rights and freedoms shall be conducted in a manner which is consistent with: (1) sound agricultural practices that promote the long-term viability of agriculture and (2) applicable resource protection policies and regulations.

**Policy I.D:** The use of the Williamson Act (Agricultural Preserve Program) shall be strongly encouraged and supported. The County shall also explore and support other agricultural land protection programs.

**Policy I.E:** The County shall recognize that the generation of noise, smoke, odor, and dust is a natural consequence of the normal agricultural practices provided that agriculturalists exercise reasonable measures to minimize such effects.

**Policy I.F:** The quality and availability of water, air, and soil resources shall be protected through provisions including but not limited to, the stability of Urban/Rural Boundary Lines, maintenance of buffer areas around agricultural areas, and the promotion of conservation practices.

**Policy I.G:** Sustainable agricultural practices on agriculturally designated land should be encouraged in order to preserve the long-term health and viability of the soil.

**GOAL III.** Where it is necessary for agricultural lands to be converted to other uses, this use shall not interfere with remaining agricultural operations.

**Policy II.D:** Conversion of highly productive agricultural lands whether urban or rural, shall be discouraged. The County shall support programs which encourage the retention of highly productive agricultural lands.

**Goal III:** Where it is necessary for agricultural lands to be converted to other uses, this use shall not interfere with remaining agricultural operations.

**Policy IV.C:** Grading and bush clearing for new agricultural improvements on hillsides shall not cause excessive erosion or downslope damage.

**Goal V:** Santa Barbara County shall allow areas and installations for those supportive activities needed as an integral part of the production and marking process on and/or off the farm.

**Policy V.A:** Santa Barbara County shall permit on-farm supportive agricultural installations for product handling and selling as prescribed in the Uniform Rules of the County’s Agricultural Preserve Program.

**Policy V.B:** Santa Barbara County should allow areas for supportive agricultural services within reasonable distance and access to the farm user.
Land Use Element

Regional Goal, Agriculture: In the Rural Areas, cultivated agriculture shall be preserved and, where conditions allow, expansion and intensification should be supported. Lands with both prime and non-prime soils shall be reserved for agricultural uses.

Hillside and Watershed Protection: Where agricultural development and/or agricultural improvements will involve the construction of service roads and the clearance of natural vegetation for orchard and vineyard development and/or improvements on slopes of 30 percent or greater, cover cropping or any other comparable means of soil protection, which may include alternative irrigation techniques, shall be utilized to minimize erosion until orchards and vineyards are mature enough to form a vegetative canopy over the exposed earth, or as recommended by the County Public Works Department.

Lompoc Area Goal, Land Use: Commercial and industrial development that complements and expands the existing agricultural industry of the area should be encouraged.

Prime agricultural lands should be preserved for agricultural use only. Preservation of lesser grades of presently producing or potential agricultural land should be actively encouraged.

Santa Maria/Orcutt Area Goal, Land Use: Promotion and protection of agriculture as an industry.

Projects within community planning areas would also be subject to agricultural protection goals and policies of the respective plan:

- Eastern Goleta Valley Community Plan
- Gaviota Coast Plan
- Goleta Community Plan
- Los Alamos Community Plan
- Mission Canyon Community Plan
- Montecito Community Plan
- Orcutt Community Plan
- Santa Ynez Valley Community Plan
- Summerland Community Plan
- Toro Canyon Plan

Santa Barbara County Uniform Rules for Agricultural Preserves and Farmland Security Zones

The Santa Barbara County Uniform Rules of Agricultural Preserves and Farmland Security Zones (Uniform Rules) is used to implement the Williamson Act and administer the Agricultural Preserve program in the County. The Uniform Rules define eligibility requirements and compatible uses to which each participating landowner must adhere in order to receive a reduced tax assessment, based
on acreage of prime and nonprime farmlands. The County also enforces Agricultural Preserve contract requirements to ensure that tax assessments for contracted lands are appropriate.

The Uniform Rules also establish standards for the termination of Williamson Act contracts and the withdrawal of land from the Agricultural Preserve program, without impairing the integrity of the program. Upon serving a notice of non-renewal, the existing contract remains in effect for the balance of the period remaining, typically a period of 10 years. The following rules apply to the proposed Project:

2-1. Principles of Compatibility

A. Uses approved on contracted lands shall be consistent with all of the following principles of compatibility:

1. The use will not significantly compromise the long-term productive agricultural capability of the subject contracted parcel or parcels or on other contracted lands in agricultural preserves.

2. The use will not significantly displace or impair current or reasonably foreseeable agricultural operations on the subject contracted parcel or parcels or on other contracted lands in agricultural preserves. Uses that significantly displace agricultural operations on the subject contracted parcel or parcels may be deemed compatible if they relate directly to the production of commercial agricultural products on the subject contracted parcel or parcels or neighboring lands, including activities such as harvesting, processing, or shipping.

3. The use will not result in the significant removal of adjacent contracted land from agricultural or open-space use. In evaluating compatibility the Board of Supervisors shall consider the impacts on non-contracted lands in the agricultural preserve or preserves.

2-1.2. Other Compatibility Criteria

A. The use does not result in the significant increase in the density of the temporary or permanent human population that could hinder or impair agricultural operations on the subject property and/or other agricultural lands in the vicinity.

B. The use does not require and will not encourage the extension of urban services such as sewer or the upgrade of public roads to urban standards that could encourage premature conversion of agricultural land to non-agricultural uses.

2-2.1. Preparation and Processing.

A. Preparation Facilities. The preparation for market of agricultural products in their raw state includes but is not limited to: sorting, grading, cleaning, packing, cooling and shipping, and is deemed compatible provided all the following are met:

1. The facility does not exceed 50 percent of the parcel or 30 acres, whichever is less, except the Board of Supervisors may allow a preparation facility to exceed 50 percent of the parcel if it finds that a substantial benefit to the agricultural community and the public can be

3The Uniform Rules’ eligibility criteria require that an Agricultural Preserve consist of no less than 100 acres for non-prime agricultural lands, 40 acres for prime agricultural lands, or a combination of 40 acres that may consist of a combination of 20-acre prime agricultural lands, or 5-acre minimum super prime agricultural lands. The County Uniform Rule 1 Section C.4 provides that in creating a prime preserve, the Board of Supervisors may at its discretion reduce the requirements for minimum size to not less than 30 acres in one parcel or in several contiguous parcels. The Board of Supervisors would have to make a series of findings presented in Uniform Rule 1.
demonstrated. However, in no case shall the facility exceed 30 acres. All such uses shall be confined to a single parcel (excepting the access road) within the premises and sited in a manner that minimizes, to the extent feasible, the land area taken out of agricultural production. Included within this site are roads serving these uses 6, all parking and storage areas, landscaping, loading areas, all attached and detached supportive structures and any other related improvements. Wastewater treatment systems are included within this site limitation if they take land out of agricultural production.

2. The acreage allowances identified above are maximums and will only be permitted upon a demonstrated need.

3. All such uses are subject to all zoning requirements, including a conditional use permit, when applicable, and its conditions and standards that are found necessary to maintain compatible agricultural land uses.

4. The parcel with the preparation facility has at least 50 percent of the parcel or 50 acres in commercial agricultural production, whichever is less, unless it can be demonstrated to the Agricultural Preserve Advisory Committee that it is unreasonable due to terrain, sensitive habitat and/or resources or other similar constraints. Where constraints are determined to exist, the Agricultural Preserve Advisory Committee will recommend the minimum productive acreage particular to the premises. Notwithstanding the commercial production eligibility requirements in Rule 1-2.3, the Board of Supervisors may establish different minimum production acreage requirements particular to the parcel and/or premises if the Board finds that a substantial benefit to the agricultural community and public can be demonstrated.

C. Small Scale Processing Beyond the Raw State. Small scale processing of agricultural products other than wine grapes (wine grapes are addressed in Section 2.2.1.B) beyond the raw state are deemed compatible within contracted land, provided the following criteria are met:

1. The proposed facility is located on a parcel that has been planted with the crop proposed for processing prior to County approval of the facility;

2. Processing of horticultural or agricultural products from offsite sources shall be limited to no more than 49 percent of the total volume of processed products on the facility premises (with allowances for normalized yields upon maturity, fallow periods, and atypical harvest years), and where such premises comprise more than one legal parcel, at least 5 percent of the total volume of processed products shall be harvested from the legal parcel upon which the processing operation is located;

3. The processing facility and any ancillary facilities such as sales, marketing, and parking are limited to 1 acre;

4. In the case of superprime contracts, such facilities are limited to parcels 10 acres or greater in size and shall be either located within existing farm buildings or count towards the development envelope allowance in order to avoid displacement of productive agricultural land;

5. The allowance identified in #3, above, is a maximum. Small Scale Processing operations will only be permitted at an appropriate scale upon a demonstrated need to support the agricultural operation.
E. **Facilities Visible from a State-designated Scenic Highway.** Agricultural preparation and processing facilities visible from a State-designated scenic highway should be sited, screened, and designed to be compatible with the scenic and rural character of the area.

**Santa Barbara County Code, Article V. Right-to-Farm Ordinance No. 4907**

The County’s Right-to-Farm Ordinance protects agricultural land uses from conflicts with nonagricultural land uses that may result in financial hardship to agricultural operators or the termination of their operation. The purpose of the ordinance is to preserve and protect agricultural zoned lands for exclusive agricultural use; to support and encourage continued agricultural operations in the County; and to forewarn prospective purchasers or residents of property adjacent to or near agricultural operations of the inherent potential problems associated with such purchase or residence including, but not limited to, the sounds, odors, dust, and chemicals that may accompany agricultural operations.

Projects that are proposed and/or approved in the County proximate to agriculturally zoned lands are often required to provide notice to future residents, tenants, and users of the Right-to-Farm.

**County of Santa Barbara Land Use and Development Code**

The Santa Barbara County Land Use and Development Code (LUDC) constitutes a portion of Chapter 35 of the Santa Barbara County Code. The LUDC carries out the policies of the Santa Barbara County Comprehensive Plan and Local Coastal Program by classifying and regulating the uses of land and structures within the County. The LUDC is adopted to protect and to promote the public health, safety, comfort, convenience, prosperity, and general welfare of residents and businesses in the County (Section 35.10.010 - Purpose of LUDC).

Section 35.21.030 lists allowable land uses on agriculturally zoned lands, and would be updated under the Project to include cannabis cultivation, manufacturing, and distribution. Development within agricultural zones should be designed, constructed, and established in compliance with the requirements in Section 35.21.050 of the LUDC and all applicable standards in Article 35.3 through Article 35.7 of the Development Code.

**Santa Barbara County Code – Carpinteria Agricultural Overlay District**

**Section 35-102F.2 Applicability and District Boundaries.**

The provisions of this overlay district that apply to greenhouses shall also apply to shade structures and hoop structures unless expressly stated otherwise. The provisions of this overlay district shall apply to AG-I zoned lands in the coastal zone of the Carpinteria Valley. The Carpinteria Agricultural Overlay District identifies areas where future development of greenhouses shall be regulated in accordance with this overlay district. *(See Figure 3.2-4.)*

Area A allows future expansion of greenhouses, greenhouse related development, packing and shipping facilities, shade structures and hoop structures, on AG-I zoned lands as identified by the Carpinteria Agricultural Overlay District map, subject to the provisions of this overlay district. Area A is generally located south of Highway 192, east of Nidever Road and west of Linden Avenue.
Area B allows new greenhouses, greenhouse related development, packing and shipping facilities, shade structures and hoop structures subject to the provisions of this overlay; however, no more than 20,000 square feet cumulative is permitted per legal lot. Area B encompasses the remainder of AG-I zoned lands in the Carpinteria Valley as identified by the Carpinteria Agricultural Overlay District map.

**Section 35-102F.3 Effect of the CA Overlay District.**

Within the CA Overlay District, all uses of land shall comply with regulations of the base zone district (AG-I). In Areas A and B legally permitted greenhouses, greenhouse related development, packing and shipping facilities, shade structures and hoop structures existing on the effective date of ordinance adoption will be considered conforming uses. New or altered greenhouses and greenhouse related development, packing and shipping facilities, shade structures and hoop structures in the Carpinteria Valley must comply with the regulations of this CA Overlay District before the issuance of a Coastal Development Permit under Section 35-169. If any of the provisions of this overlay district conflict with the provisions of base zoning district regulations, the provisions that are most restrictive shall govern.

**Section 35-102F.4 Development Cap for Greenhouses and Greenhouse Related Development.**

Within Area A of the CA Overlay District, no more than 2.75 million square feet of new greenhouses, greenhouse related development, packing and shipping facilities, and hoop structures may occur after the date of adoption of this overlay district. For the purpose of calculating this development cap, all greenhouses, packing and shipping facilities, hoop structures, and greenhouse related development (including associated paved parking and driveways, and associated accessory structures [e.g. boiler rooms, storage sheds]) shall be included. Shade structures shall not be calculated towards the cap. Structures that are legalized during the amnesty period (Section 35-102F.7.2) shall not be calculated towards the development cap.

**Section 35-102F.5 Processing.**

1. The following types of development shall require a Coastal Development Permit (Section 35-169):
   a. Development of new greenhouses, greenhouse related development, packing and shipping facilities, additions or alterations to existing greenhouses or related development, and conversions of shade or hoop structures to greenhouses, where the cumulative lot coverage is less than 20,000 square feet (See Section 35-102F.5.3 for additional requirements for packing and shipping facilities).
   b. Development of new shade structures or hoop structures greater than 500 square feet, where the cumulative lot coverage is less than 20,000 square feet. Hoop structures greater than 5,000 sq. ft. in area shall be subject to Flood Control District review to mitigate potential drainage and erosion impacts.
   c. Minor alterations or additions to an existing greenhouse, packing and shipping facility, or related development, including retrofits of aging structures, if such alterations and additions meet the requirements of this overlay district and all of the following applicable criteria:
      i. The existing structure(s) shall be legally permitted.
      ii. Alterations shall not conflict with project conditions of approval for the existing structure.
iii. Alterations to existing structures shall not reduce the effectiveness of existing landscape screening, result in the removal of specimen trees, or disrupt environmentally sensitive areas.

iv. Alterations shall incorporate the applicable development standards set forth in Section 35-102F.9 (Development Standards for Greenhouses and Related Development).

v. Additions shall not result in a cumulative lot coverage of 20,000 square feet or more, or in an increase of 1,000 square feet or 5% of building coverage of all existing structures, whichever is less.

3.2.4 Environmental Impact Analysis

This section discusses the potential agricultural resources impacts associated with the proposed Project. The conversion of important farmland to non-agricultural uses, along with any potential conflicts with existing land uses or other agricultural operations, may be considered significant impacts on agricultural resources, as described further herein.

3.2.4.1 Thresholds of Significance

CEQA Guidelines

With respect to agricultural resources, applicable sections of Appendix G of the CEQA Guidelines state that a project would normally have a significant impact on the environment if it would:

- Convert prime farmland, unique farmland, or farmland of statewide importance to non-agricultural use.
- Conflict with existing zoning for agricultural use, or a Williamson Act contract.
- Involve other changes in the existing environment which, due to their location or nature, could individually or cumulatively result in the conversion of farmland to non-agricultural use.

County of Santa Barbara Environmental Thresholds and Guidelines

The County of Santa Barbara Agricultural Resource Guidelines, included within the Santa Barbara County Environmental Thresholds and Guidelines Manual (County of Santa Barbara 2008) uses a point system to assign relative values to particular characteristics of a site’s agricultural productivity (e.g., soils, parcel size, water availability, land use designation, and a range of other issues) to determine whether a proposed project’s impact on loss or impairment of agricultural resources will be considered to have a potentially significant impact. Where points total 60 or more, the following projects would have a potentially significant impact:

- Projects which involve the approval of a Development Plan, approval of a Conditional Use Permit, or other discretionary act which would result in the conversion from agricultural use of a parcel qualifying as viable using the weighting system; or
- Discretionary projects that may result in substantial disruption of surrounding agricultural operations.
“If a potentially significant impact is identified using these criteria, further more detailed, site-specific evaluation of agricultural impacts is completed in an EIR. The EIR analysis should focus upon the factors and criteria, but not the points, in the weighting system of these guidelines, and any other relevant factors such as the history of agricultural use on the site, land use trends, etc. Final determination of the project’s level of impact will be based on this analysis.” – Page 11 (County of Santa Barbara 2008)

Thresholds relating to land use compatibility, are analyzed further in Section 3.9, Land Use and Planning.

### 3.2.4.2 Project Impacts

Compatibility between the proposed Project and agricultural operations, as well as other land uses are analyzed further in Section 3.9, Land Use and Planning. Table 3.2-4 below provides a summary of the impacts related to agriculture from the proposed Project. Existing development standards and standard permit processes and conditions as well as development standards and requirements proposed as part of the Project, would serve to mitigate environmental impacts and are referenced in the analysis below.

**Table 3.2-4. Summary of Agricultural Resources Impacts**

<table>
<thead>
<tr>
<th>Agricultural Resources Impacts</th>
<th>Mitigation Measures</th>
<th>Residual Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Impact AG-1. Proposed land uses under the proposed Project are potentially incompatible with existing zoning for agricultural uses and Williamson Act contracts.</td>
<td>MM AG-1. Cannabis Cultivation Prerequisite to Ancillary Use Licenses</td>
<td>Less than significant with mitigation (Class II)</td>
</tr>
<tr>
<td>Impact AG-2. Cumulative cannabis-related development would potentially result in the loss of prime agricultural soils. However, the Project would not result in conversion to non-agricultural use or impair agricultural land productivity (whether prime or non-prime).</td>
<td>MM AG-2. New Structure Avoidance of Prime Soils</td>
<td>Significant and unavoidable (Class I)</td>
</tr>
<tr>
<td>Cumulative Impacts</td>
<td>None required</td>
<td>Significant and unavoidable (Class I)</td>
</tr>
</tbody>
</table>

**Impact AG-1. Proposed land uses under the proposed Project are potentially incompatible with existing zoning for agricultural uses and Williamson Act contracts.**

The Project amendments would permit, or conditionally permit, licensed cannabis activities and facilities such as cannabis cultivation, manufacturing, distribution, and microbusinesses without retail on lands primarily used for agriculture (AG-I and AG-II), in Santa Barbara County. Because the microbusiness license contains cultivation, manufacturing, and distribution components, these items are addressed individually within the following discussion. The Project would additionally allow cannabis activities on lands that are subject to Williamson Act contracts. Nearly 30 percent of known cultivation sites in the County are located on Williamson Act contract lands (Table 3.2-2), and produce nearly half of all cannabis within the County; therefore, future cannabis activities development would be anticipated to continue within contracted lands, provided that they comply with the Uniform Rules.

Per the California Health and Safety Code (HSC) and California Business and Professions Code, medical cannabis is identified as an "agricultural product" (HSC Section 11362.777). Additionally, per SB 94
requirements, applicants seeking a cultivation license would be required to provide a statement
declaring the applicant is an “agricultural employer,” defined by the Alatorre-Zenovich-Dunlap
Berman Agricultural Labor Relations Act of 1975 as “any person acting directly or indirectly... in
relation to... any association of persons engaged in agriculture, and shall include any person who owns
or leases or manages land used for agricultural purposes” (State of California 2012). As such,
applicants applying for cannabis licenses would be overseeing land used for agricultural purposes,
and the growing of cannabis under SB 94 would constitute an agricultural purpose and resultant
cannabis products as an agricultural product. Therefore, utilizing a license to grow cannabis would
ensure agricultural purposes are carried out, and these actions would not convert associated FMMP
farmland or prime agricultural soils to non-agricultural uses, nor conflict with existing zoning for
agricultural uses.

Per California Government Code Section 51201, an agricultural commodity under the Williamson Act
is defined as “any and all plant and animal products produced in this state for commercial purposes,”
and an agricultural use consists of the “use of land, including but not limited to greenhouses, for the
purpose of producing an agricultural commodity for commercial purposes” (State of California 2017).
Additionally, guidance from the Department of Conservation has stated that cannabis is an
agricultural product under the 2015 MCRSA statutes and that nothing in the Williamson Act prohibits
the growth of cannabis on land enrolled in the Williamson Act (DOC 2016). A city or county’s
participation in the Williamson Act does not alter a local government’s authority to place conditions
on crop types and agricultural practices allowed in areas under its jurisdiction.

Pursuant to 2-2.1 A and 2-2.1 C of the Uniform Rules, and subject to future decisions under the
Agricultural Preserve Advisory Committee (APAC)\(^4\), manufacturing, distribution, or microbusinesses
under the Project would be permitted as an ancillary use to cannabis cultivation on Williamson Act
Contract lands. These rules guide the compatibility of preparation facilities and small-scale processing
beyond the raw state, which would consist of both non-volatile and volatile manufacturing techniques
in support of the agricultural purpose. The Uniform Rules recognize that some secondary uses
inherently related to agricultural operations may be compatible, if they are consistent with the
compatibility guidelines with the Uniform Rules. (See Section 3.2.3.2, Regulatory Setting.)

In order for a cannabis activity license to be approved on contracted lands, the use must not
significantly compromise long-term productive agricultural capability or impair long-term
agricultural operations. The APAC evaluates the compatibility of uses on an Agricultural Preserve on
a case-by-case basis, and the uses are subject to development standards and requirements in County
zoning ordinances. Individual cannabis facility development on these lands would also require County
review for permit approval, and would be subject to conditions necessary to maintain compatible
agricultural land uses under agricultural zoning. Additionally, land use compatibility with adjacent
agricultural crops would be ensured by APAC review which ensures compatibility with agricultural
uses, and cannabis activities would not conflict with properties that are subject to Williamson Act
contracts. For instance, due to extensive testing requirements for cannabis products, it is a benefit for
cannabis cultivators to be located further away from agricultural operations which utilize potentially
hazardous pesticides, such as grape and strawberry harvesters.

\(^4\) APAC has given County staff conceptual guidance on potential amendments to the Uniform Rules, the conceptual
changes would restrict cannabis uses on Williamson Act Lands. This action would drastically modify the proposed
Project. Refer to Chapter 4, Alternatives Analysis, for more information on APAC’s preliminary direction and the
alternative analysis based on that direction.
It is expected that some manufacturing uses would locate on agricultural lands, such as within structures of the Carpinteria Valley and within the Santa Ynez and/or Lompoc regions (which have limited land zoned for manufacturing or commercial purposes). Per Agricultural Element Policy II.D and Goal III, manufacturing processes would require siting so as to prevent the removal of any production or areas of production, which would include soils (e.g., prime soils) that may be used for cannabis or other agricultural cultivation, subject to approval by the County Planning and Development Department. The County could deny applications that would impact agricultural production or result in land conversion of such principal uses.

It is estimated that approximately 16 percent of applicants may seek manufacturing licenses from the County for the first 5 years of the Project (until the industry is assumed to stabilize, as discussed in Section 3.0 of this EIR), but that some portion of these manufacturers would not seek licenses on agricultural lands given the utility demands and structural requirements, such as energy, water, and wastewater. (See also, Section 3.13, Utilities and Energy Conservation.) Under the Project, cannabis manufacturing, distribution, or microbusinesses would not require licensed cultivation activities to occur onsite as a prerequisite for manufacturing and distribution licenses, and manufacturing and distribution licenses within these zones could be permitted without the cultivation of an agricultural product. Microbusiness licenses would not have this issue, provided that cultivation is indeed occurring onsite. Therefore, manufacturing and distribution uses without cultivation would be a primary use on AG-I and AG-II zoned lands, which would conflict with the established uses for agriculturally zoned lands to produce agricultural products. This would result in potentially significant impacts towards on the established integrity of agriculturally zoned lands, and would require implementation of MM AG-1, Cannabis Cultivation Prerequisite to Ancillary Use Licenses, to ensure manufacturing and distributing activities are subsidiary (accessory) uses to support the agricultural use of agriculturally-designated County lands, similar to the development of wineries in the County to support the principal agricultural operation of vineyards.

Impact AG-2. Cumulative cannabis-related development would potentially result in the loss of convert-prime agricultural soils. However, the Project would not result in conversion to non-agricultural use or impair agricultural land productivity (whether prime or non-prime).

As discussed above, the consideration of cannabis as an agricultural product would ensure consistency with growing cannabis on soils designated for agricultural uses. Given that cultivation demand by Project registrants would potentially comprise 0.2 percent of eligible land area designated by the County for agricultural uses, impacts from the cultivation of cannabis pursuant to the ordinance would not result in substantial conversion of Prime Farmland, Farmland of Statewide Importance, or Unique Farmland to non-agricultural use. Similarly, cannabis cultivation is would not unlikely to lead result into conversions of prime soils as identified by the NRCS, as cannabis requires the use of soil, water, and environment control similar to agricultural crops of the cut flower industry. Water and energy usage associated with cannabis activities, including comparison of the plant with other agricultural crops, is discussed further in Section 3.13, Utilities and Energy Conservation.

Indoor cultivation could include the use of permanent cement foundations, which could cover agricultural soils, or new buildings that would trigger additional infrastructure upgrades; however, this would represent less than 3 percent of potential industry expansion under the Project, and is would be generally reserved for commercial and industrial areas of the County. Greenhouses constructed for cannabis cultivation and manufacturing could overlie agricultural soils; however, Sections 35-102F.2 through 102F.5 greatly limit the amount of impervious surfaces that may occur
from the development of greenhouses in Carpinteria Valley, and County Agricultural Element Policy II.D and Goal III would prevent the loss of highly productive agricultural lands.

The existing agricultural practices, the development envelope of future cannabis activities under the proposed Project may include, but would not be limited to, hoop structures, drying rooms, processing and packaging facilities, distribution storage areas, and manufacturing structures. This development, although largely compatible with agricultural land uses as ancillary development, would potentially result in development on prime and nonprime soils, some of which would be prime farmland, unique farmland, or farmland of statewide importance under the FMMP. Development standards for agricultural zoned lands would apply to cannabis activity structures where structural development shall avoid or minimize impacts to prime soils and productive agricultural land to the maximum extent feasible (Section 35.21.050 of the LUDC). Development Plans subject to additional environmental review would be required for some development, such as for greenhouses greater than 20,000 square feet, in order to minimize impacts to agricultural resources. Therefore, under the Project, measures would be in place to reduce the loss of agricultural resources resulting from cannabis activity structural development; however, they would not avoid the conversion of agricultural soils altogether. Nevertheless, the agricultural use of prime agricultural soils would remain intact, as the ancillary structures are in direct support of the agricultural activity.

Future cannabis activity structural development does not account for all elements of the potential development envelope; this may include parking areas, circulation roads, visual screening and landscaping, wastewater treatment systems, or other related improvements that would potentially remove land out of agricultural production. These elements could result in incremental losses of agricultural lands on a cannabis activity site. In order to address this, County Agricultural Element Policy II.D and Goal III prevent the loss of productive agricultural operations. However, as discussed above, agricultural use of prime agricultural soils would remain intact, as the ancillary structures would be in direct support of the agricultural activity.

Additionally, volatile manufacturing, distribution, and microbusiness licenses on agricultural land would generally be subject to additional CEQA review, and, therefore, loss of agricultural resources would be addressed for these cannabis activities on a case-by-case basis for these types of ancillary uses.

Future cannabis activity expansion is expected to occur over approximately 730 acres for cultivation, 15.5 acres for manufacturing, and 6.5 acres for distribution, which would represent approximately 1 percent of the County’s 67,202 acre of prime farmland (if entirely located on these areas, though highly unlikely), or less than 0.1 percent of all County farmland. For each cannabis activity site, on given parcels, the amount of prime soils affected may be small, as the threshold for significant impacts of soil loss would likely be less than the amount of conversion from agricultural use of a parcel qualifying as viable using the County’s weighting system. However, cumulatively the Project would convert prime soil with incremental development of ancillary structures on agricultural land in the County.

Development standards under the proposed Project, LUDC, and Uniform Rules, as well as review processes for land use and other zoning permits, would limit conversion of agricultural lands. However, the development envelope of future cannabis activity sites under the proposed Project would result in losses of agricultural soils due to the cumulative potential development of ancillary structures such as processing, packaging, distribution, and manufacturing facilities that may overlie prime soils, similar to the existing potential conversion of prime soils under existing agricultural operations. Though individual sites may not result in a significant impact under County thresholds,
cannabis activity development pursuant to the Project would potentially aggregate to a considerable conversion of prime soils, and would represent a potentially significant impact on prime soil agricultural resources, and would require implementation of MM AG-2, New Structure Avoidance of Prime Soils, to reduce impacts.

3.2.4.3 Cumulative Impacts

As described in Section 3.0, Introduction and Approach to Analysis, the cumulative setting for the Program involves a variety of planning programs in the region of Santa Barbara County along with regional growth and ongoing development under the County's Comprehensive Plan, including the pending Hoop Structure Update and the Legal Nonconforming Use Determination for Article X efforts. Specifically, cannabis activities may increase or decrease in different locations in the County depending on the County's proposed amendment to Article X of the County Code, which would require acknowledgement, relocation, or closure of existing legal nonconforming cannabis operations in the County. However, it is expected that overall increases in emissions would occur given the potential for growth in the agricultural and manufacturing industries under the Project. Program approval would contribute to cumulative agricultural impacts associated with pending and future growth and development projects Countywide, including changes in County agricultural crops and associated activities over time.

Greater buildout in the number of cannabis activity sites within the County is anticipated to occur over approximately 5 years following adoption of the Project. Growth from buildout projections identified in County community plans, such as the Eastern Goleta Valley Community Plan, and similar buildout projections from other jurisdictions within the South Coast, Santa Ynez, and Lompoc regions, a variety of projects, programs, or initiatives would have the potential for additional growth in the County. As cannabis activity site development would result in some conversion of agricultural soils to non-agricultural soil uses (i.e., construction of roads and buildings), gradual cannabis activity site growth and projects listed in Table 3.0-2, could potentially lead to combined losses in prime or nonprime soils in areas where cannabis activity site expansion is concentrated without existing agricultural infrastructure, such as within the Lompoc and Santa Ynez regions.

As growth has the potential to occur throughout the County, it is anticipated that development standards under the proposed Project, LUDC, MLUDC, CZO, and Uniform Rules, as well as review processes for Development Plans and/or land use permits with integrated integration would limit the conversion of agricultural lands. In the Los Alamos and Santa Ynez Regions, cannabis activity site growth is anticipated on parcels which are much larger in size in these regions and have the ability to support large industrial-sized cannabis activity site developments, though the prime farmland of the Carpinteria area contains existing infrastructure to potentially support Project buildout demand. Future cannabis activity site expansion would represent approximately 1 percent of the County's 67,202 acre of prime farmland (if entirely located on these areas, though highly unlikely), or less than 0.1 percent of all County farmland. Given the estimated amount of cannabis activity anticipated throughout the County, agricultural soil losses from cumulative cannabis activity development would be adverse but relatively negligible on a Countywide scale. Nevertheless, the cumulatively considerable loss of prime soils would represent a potentially significant impact.

Cumulative direct and indirect impacts associated with the Project's cannabis activities would include potential exposure to agricultural resource conflicts associated with the combined new cannabis canopy by registrants seeking licenses, of 376 acres up to 1,126 acres, with additional acreage for support development and future license applicants, as well as development of structures
to support cannabis cultivation and manufacturing activities. Though agricultural land use consistency impacts are entirely mitigated, the cumulatively considerable loss of prime soils from the allowed development of cannabis activity facilities would result in impacts that are significant and unavoidable.

### 3.2.4.4 Proposed Mitigation Measures

**MM AG-1. Cannabis Cultivation Prerequisite to Ancillary Use Licenses.** The County shall amend the Project to specify that in order to obtain a manufacturing or distribution license (Types 6, 7, and 11) on lands designated for agricultural use (e.g., AG-I and AG-II), the applicant must cultivate cannabis on-site and have approval for a cultivation license (Types 1-5). The purpose of this mitigation is to ensure that agricultural production is the primary use on agriculturally-zoned lands, and that manufacturing and/or distribution is maintained as a subordinate and incidental use. The amendment shall specify that non-cultivation activities must be clearly ancillary and subordinate to the cultivation activities on-site so that the majority of cannabis product manufactured and/or distributed from a cannabis site is sourced from cannabis plant material cultivated on the same site. The amendment shall also specify that the accessory use must occupy a smaller footprint than the area dedicated to cannabis cultivation. Further, the amendment shall apply to microbusiness licenses (Type 12) to ensure that proposed manufacturing or distribution would be ancillary and subordinate to the proposed cultivation area, as described above.

**Plan Requirements and Timing:** The proposed cannabis ordinances shall be revised prior to adoption of the Project by the County. The County shall submit the ordinances with the revisions to the Board of Supervisors for review and approval.

**Monitoring:** The Planning and Development Department shall review applications to ensure that requests for manufacturing, distribution, or microbusiness licenses on agriculturally-zoned lands are preceded by permitted approval of a cultivation license on-site and that manufacturing and distribution is ancillary to cultivation on cannabis sites within AG-I and AG-II zone districts.

**MM AG-2. New Structure Avoidance of Prime Soils.** During the review of applications for cannabis site development and licensing, the County Planning and Development Department shall review the proposed location of any new structures proposed for cannabis-related activities relative to known agricultural soils on site in order to avoid development of new structures associated with the Project on prime soils. Any new structures proposed for development must be sited on areas of the property that do not contain prime soils, to the maximum extent feasible.

**Plan Requirements and Timing:** Preliminary site plans and applications for cannabis sites must undergo review by Planning and Development to ensure that development on prime soils are avoided to the maximum extent feasible. Preliminary site plans and applications must be approved prior to permit approval and licensing. If siting on prime soils is unavoidable, the applicant for the cannabis permit shall submit a written statement justifying the inability and/or infeasibility of avoiding prime soils to County Planning and Development Department staff.

**Monitoring:** The Planning and Development Department shall ensure that consideration is given to onsite prime soils for each cannabis site. If adjustments are made, the Planning...
and Development Department shall ensure revisions of site plans for development are completed prior to permit approval.

### 3.2.4.5 Residual Impacts

Impact AG-1. Implementation of **MM AG-1. Cannabis Cultivation Prerequisite to Ancillary Use Licenses**, would ensure that manufacturing and distribution licenses remain subordinate and incidental uses on agriculturally-zoned lands. Volatile manufacturing would only occur on agriculturally designated lands as a subsidiary, compatible use to agricultural cultivation with discretionary approval, and non-volatile would remain principally permitted, though codified as a subordinate and incidental use, along with microbusinesses. Further, because manufacturing and distribution facilities would consist of an accessory use on agricultural sites and are anticipated to comprise a small portion of total available land zoned for agricultural uses, impacts on agricultural resources would be minorless than significant. Because agricultural manufacturing and distribution activities would be permitted as a secondary, ancillary use to agriculture, thus supporting and supporting the agricultural use of the land, impacts to agriculturally-zoned land would be less than significant minimal. Given the development standards and Development Plan process outlined in the LUDC, MLUDC, and CZO, and mitigation implementation, the proposed Project would be compatible with existing zoning for agricultural land uses. Residual conflicts with agricultural zoning and Williamson Act contracts would therefore be less than significant with mitigation (Class II).

Impact AG-2. With implementation of development standards under the proposed Project, adherence to the Comprehensive Plan, and Uniform Rules, as well as review processes for Development Plans and land use permits, impacts to prime agricultural soils and soil productivity under the Project would be reduced. Additionally, implementation of **MM AG-2, New Structure Avoidance of Prime Soils**, would reduce impacts associated with the loss of prime soils. However, implementation of the mitigation measure would not ensure that an aggregate loss of prime soils would be avoided from development of ancillary uses to cannabis cultivation; that is, there is no guarantee all prime soils would not be avoided, because there are would be some viable sites that are entirely comprised of prime soils. Therefore, residual impacts on agricultural resources would be significant and unavoidable (Class I).
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