3.7 Hazards and Hazardous Materials

3.7.1 Introduction

This section evaluates impacts related to hazards and hazardous materials from the Cannabis Land Use Ordinance and Licensing Program (Project). It identifies existing hazards in the County of Santa Barbara (County), including the location of known hazardous materials and applicable regulations. Potential Project impacts are evaluated. Cannabis activities may result in environmental impacts related to hazards and hazardous materials, including human and wildlife exposure to hazardous substances and potential for wildfires. Hazards can arise from both manmade and natural conditions, including potential for natural disasters. Hazardous materials involve chemicals, such as petroleum products, solvents, pesticides, herbicides, paints, metals, asbestos, and other regulated materials, that can cause death, serious injury, long-lasting health effects, and damage to buildings, homes, and other property. Hazards can also arise from volatile cannabis manufacturing. Areas where historical releases of hazardous materials have occurred could pose a risk to public health and the environment.

Hazards and hazardous materials information in this section is based primarily on information from recent County Environmental Impact Reports (EIRs), California Environmental Protection Agency (CalEPA), California State Water Resources Control Board’s (SWRCB’s) Geotracker database, California Department of Toxic Substances Control’s (DTSC’s) EnviroStor database, and U.S. Environmental Protection Agency’s (USEPA’s) Resource Conservation and Recovery Act (RCRA) Biennial Report for hazardous waste generators.

A range of other types of hazards are addressed in other sections of this EIR as follows: geologic hazards, such as earthquakes, landslides, and bluff stability are addressed in Section 3.6, Geology and Soils; air pollution hazards, such as toxic air contaminants (TACs) and particulate matter, are addressed in Section 3.3, Air Quality and Greenhouse Gas Emissions; water pollution hazards, such as groundwater contamination and surface runoff, are addressed in Section 3.8, Hydrology and Water Resources; urban fire hazards and response/suppression systems are discussed in Section 3.11, Public Services; and hazardous solid waste disposal is addressed in Section 3.13, Utilities and Energy Conservation. Impacts from exposure of wildlife to hazardous materials are addressed in Section 3.4, Biological Resources.

3.7.2 Environmental Setting

In the County, there are a variety of agricultural, commercial, and industrial uses that involve the handling and storage of potentially hazardous materials that could adversely affect soil and groundwater. Several highways are primary transportation routes through the County, which present risk from possible spills of hazardous materials (Federal Motor Carrier Safety Administration 2009). Primary transportation routes include U.S. Highway 101, the main vehicular travel corridor in the County, and California State Routes (SRs) 1, 33, 135, 144, 150, 154, 166, 192, 217, 225, and 246, which primarily provide access through County regions and connect many incorporated and unincorporated communities. Transportation of hazardous materials often involves major arterial roads and local streets through populated and urbanized areas.
The County’s extensive woodlands, chaparral, scrub, and grassland habitats present significant wildfire risk and have been designated as Wildfire Hazard Severity Zones, including the Wildland-Urban Interface Zones, by the California Department of Forestry and Fire Prevention (CalFire) (CalFire 2017). In addition, the County includes the Santa Barbara Municipal Airport, Santa Maria Public Airport, Santa Ynez Airport, Lompoc Airport, and New Cuyama Airport, which present potential for hazards associated with aviation incidents. Vandenberg Air Force Base (VAFB) also presents the potential for hazards associated with aviation, satellite launches, and ballistic missile testing.

Based on the June 2017 Non-Personal Cannabis Cultivation and Related Operations Registry Program (Cannabis Registry), existing cannabis cultivation operations have historically been or are currently concentrated in more rural settings, such as remote and mountainous areas of Tepusquet Canyon and mountainous canyon settings of the Lompoc Valley. These existing cannabis operations can be associated with fires, use of hazardous materials such as pesticides and highly flammable materials, and, on occasion, explosions. In addition, some cannabis operations may engage in potentially hazardous volatile butane honey oil (BHO) extraction processes, which involve the use of flammable or explosive substances. Given the relatively remote and mountainous settings of these areas, as well as the high amount of natural vegetation and types of activities associated with these cannabis operations, such areas may pose or experience greater threat from fire hazards.

### 3.7.2.1 Hazardous Sites

As briefly discussed above, the County has current and former uses involving hazardous materials, resulting in the potential for past and/or ongoing site contamination in each of the five regions of the County. Existing and historical land uses in the County have varying degrees of hazard risk. Hazardous materials may be found in the materials of older buildings, such as asbestos or lead-based paints (LBPs), or may have been used routinely for the operation of certain land uses, such as automotive repair shops, commercial agricultural fields, medical offices, dry cleaners, and photo processing centers. Potentially hazardous materials that currently occur throughout the County are commonly found in urban and agricultural areas, and generally include cleaning and metal solvents, pesticides/herbicides, paints, and oils and lubricants. In addition, some properties in the County, including Casmalia, have experienced historical releases of hazardous materials, resulting in potentially contaminated soils and/or groundwater. Land uses that are particularly sensitive to the release of hazards or hazardous materials include residential, educational, assisted living, and daycare, which are located throughout the County.

<table>
<thead>
<tr>
<th>Table 3.7-1. Known Regulated Hazardous Sites within the County</th>
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<tbody>
<tr>
<td><strong>Site/Facility Type</strong></td>
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<tr>
<td>Hazardous Waste Generating Site</td>
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<tr>
<td>Superfund Sites</td>
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<td>Cleanup Project Sites</td>
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<td>ILRP Sites</td>
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<td>LUST Cleanup Sites</td>
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<tr>
<td>Military Sites</td>
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<tr>
<td>Permitted USTs</td>
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<td><strong>Total</strong></td>
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Source: California Department of Toxic Substances Control 2017; California Environmental Protection Agency State Water Resources Control Board 2017.
A review of the USEPA's RCRA Biennial Report, the DTSC's EnviroStor database, and SWRCB's Geotracker database indicate a variety of hazardous waste reporting facilities located throughout each of the County's five regions. The County has over 2,799 known, past, or existing regulated hazardous sites, which have required regulatory oversight to address contamination issues (California Department of Toxic Substances Control 2017; California Environmental Protection Agency State Water Resources Control Board 2017). These include 11 hazardous waste generating sites, 464 hazardous waste cleanup sites, 1,497 permitted Irrigated Lands Regulatory Project (ILRP) sites with historic pollutant runoff primarily located within the South County Region, 167 permitted Underground Storage Tanks (USTs), and 656 Leaking Underground Storage Tank (LUST) sites (Table 3.7-1). These databases also identify eight hazardous waste generators regulated under the RCRA (five closed, one undergoing closure, and two operating), five hazardous waste and substances sites ("Cortese List" Sites), and one active Superfund site.

### 3.7.2.2 Hazardous Materials and Agriculture

Agricultural production activities, including both conventional and organic agriculture, occur throughout the County. (Refer to Section 3.2, Agricultural Resources, for detailed discussion of agricultural land within the County.) Agricultural activities involve the use of regulated hazardous materials, particularly commercial pesticides. Pesticide use is regulated by the County Agricultural Commissioner's Office, with permits required for pesticide application. Such pesticide use is carefully regulated under state law and consistent with guidelines issued by the California Department of Pesticide Regulation (DPR). DPR has published legal pest management practices for cannabis growers in California, which include a list of active ingredients which can be used on cannabis and the pests that these active ingredients target (DPR 2017). Such regulations generally govern the type of pesticide applied, as well as the location, timing, and rules of applications. Special consideration is given to application near schools.

Pesticides – including rodenticides, insecticides, herbicides, fungicides, and other pest controlling substances – are applied in various locations throughout the County to support commercial cultivation of agricultural crops. Consequently, pesticides, fertilizers, and associated contaminants may be present in near-surface soils in residual concentrations at these locations. Many irrigated lands are currently required to operate under the ILRP to regulate runoff of pesticides, fertilizers, and sediments from irrigated lands through Waste Discharge Requirements (WDRs or "Orders") issued by the SWRCB.

Unpermitted cannabis operations occur in agricultural areas. Because it is currently unregulated, existing cannabis activities involve the use of unknown amounts and varieties of pesticides and hazardous materials. However, it is known that pesticides are often used to control rodents, including rats and gophers, and insects, including gnats, mites, and aphids. See Section 3.4, Biological Resources, for impacts to wildlife related to pesticides.

### 3.7.2.3 Hazardous Materials and Manufacturing, Testing, Retail, and Distribution

The County supports many heavy industrial and commercial uses, which may be associated with the storage, use, and disposal of hazardous wastes and materials. There are regulated hazardous waste generators and contamination sites within industrial and commercial zones. Uses located within these zoning districts may: have involved or continue to involve hazardous operations; contain
aboveground storage tanks (ASTs) and USTs containing fuel; utilize flammable or explosive substances and other hazardous compounds; and/or expose workers and people involved with nearby uses to known hazards associated with these heavy industrial and commercial uses.

Cannabis manufacturing involves both non-volatile and volatile extraction processes. Non-volatile extraction typically involves the use of low risk solvents, such as alcohol or water, to dissolve tetrahydrocannabinol (THC) from the cannabis plant to produce an extract. Infused products are made from raw cannabis flower/leaves or prepared concentrate into different mediums to make new products, which do not pose a hazard risk. Volatile processes typically include or require equipment or substances that are volatile in nature, that is, flammable and explosive, such as compressed butane gas and other hydrocarbon compounds, to produce THC extracts typically in the form of BHO or carbon dioxide (CO2) cannabinoid concentrates and oils. Although volatile cannabis manufacturing can be performed safely, known problems and reported incidents associated with existing unlicensed and sometimes poorly executed manufacturing operations range from fires and explosions to hazardous materials spills. Such cannabis product manufacturing industry accidents can result in substantial harm to property and persons, both those involved in the process of cannabinoid extraction and unknowing people within the area. For instance, the engagement in BHO extraction processes in an apartment complex in Goleta is believed to have resulted in an explosion and fire which caused damage to the apartment complex and serious injury to the individual engaging in the volatile extraction process (Santa Barbara County Sheriff 2017).

While the manufacturing of cannabis products is considered to be one of the most hazardous activities associated with the cannabis industry, the distribution, testing, and sale of cannabis may also present hazards from the storage, use, and disposal of hazardous materials. In accordance with the Medical Cannabis Regulation and Safety Act (MCRSA) and the Adult Use of Marijuana Act (AUMA), testing of cannabis is currently conducted in laboratory settings in compliance with standards established by the Business and Professions Code. The testing of cannabis involves the regular use, transport, and disposal of hazardous materials such as chemicals, reagents, and solvents utilized for analytical testing of cannabis. However, such analytical testing does not tend to involve volatile processes or substantially hazardous activities, and are conducted in very controlled environments. See Section 2.0, Project Description, for additional information about cannabis activities.

### 3.7.2.4 Wildfire Hazards

The County experiences annual cycles of elevated fire danger. Due to its low annual precipitation, highly flammable vegetation, and high velocity "sundowner" and "Santa Ana" winds, the County has routinely experienced major wildfires that threaten residents’ safety and property. CalFire requires counties to develop fire protection management plans that address potential threats of wildland fires.

According to information obtained from CalFire, much of the land in the County exists within CalFire Fire State Responsibility Area Hazard Severity Zones (CalFire 2017). Fire Hazard Severity Zones are identified as "moderate," "high," and "very high" using a science-based and field-tested computer model that assigns a hazard score based on the factors that influence fire likelihood and fire behavior. Factors considered include fire history, existing and potential fuel (natural vegetation), flame length, blowing embers, terrain, and typical weather for the area. According to Fire Hazard Severity Maps, most of the County eligible for cannabis activities is designated as "high" to "very high" Fire Hazard Severity Zones. The greatest concentration of lands designated as "very high" fire hazard severity exists along the Santa Ynez Mountains in the South Coast and Lompoc Regions, along the San Rafael
Mountains in the Santa Ynez and Cuyama Regions. "High" fire hazard severity lands exist in the valley areas, including the Santa Ynez and Santa Maria Valleys (See Figure 3.7-1.).

The County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) also designates critical hazard areas of the County, as areas subject to greater threat from wildfire, and identifies these areas based on slope, vegetation, ability to respond to fire threats, and localized weather conditions to assist in preparation of County hazard mitigation and response planning (County of Santa Barbara Office of Emergency Management 2017).

Because existing cannabis activities are in "very high" and "high" Fire Hazard Severity Zones within the County, there is concern that cannabis activities could spark wildfire. Some sites may include activities using higher fire risk methods, such as open blast BHO production.

### 3.7.2.5 Oil Extraction Areas

According to the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR), active well fields, and plugged and abandoned oil wells can be found throughout the County. New development near active oil fields could potentially expose construction workers to chemical hazards. Also, it is possible that oil wells abandoned to past or current standards may begin leaking oil. All oil wells (abandoned, plugged, or active) located on land eligible for licensing of cannabis activities would be managed according to DOGGR procedures and in conformance with DOGGR requirements.

### 3.7.3 Regulatory Setting

The hazards analysis was conducted in conformance with the goals and policies of federal, state, and local regulations, as described below.

#### 3.7.3.1 Federal


The Federal Toxic Substances Control Act (1976) and RCRA established a USEPA-administered program to regulate the generation, transport, treatment, storage, and disposal of hazardous waste. RCRA was amended in 1984 by the Hazardous and Solid Waste Act (HSWA), which affirmed and extended the "cradle to grave" system of regulating hazardous wastes.

**Comprehensive Environmental Response, Compensation, and Liability Act/Superfund Amendments and Reauthorization Act**

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as "Superfund" (42 United States Code [USC] 103) was enacted by Congress on December 11, 1980. This law provides broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA establishes requirements concerning closed and abandoned hazardous waste sites, provides for liability of persons responsible for releases of hazardous waste at these sites, and establishes a trust fund to
Countywide Fire Hazard Severity Areas

FIGURE 3.7-1
provide for cleanup when no responsible party can be identified. CERCLA also enabled the revision of the National Contingency Plan (NCP) (40 Code of Federal Regulations [CFR] 300). The NCP provides the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, and/or contaminants. The NCP also established the National Priorities List (NPL). CERCLA was amended by the Superfund Amendments and Reauthorization Act (SARA) on October 17, 1986.

Clean Water Act/Spill Prevention, Control, and Countermeasure Rule

The Clean Water Act (CWA) (33 USC 1251 et seq., formerly the Federal Water Pollution Control Act of 1972) was enacted with the intent of restoring and maintaining the chemical, physical, and biological integrity of waters of the United States. As part of the CWA, USEPA oversees and enforces the Oil Pollution Prevention regulation contained in 40 CFR 112, which is often referred to as the “SPCC Rule” because it requires facilities to prepare, amend, and implement spill prevention, control, and countermeasure (SPCC) plans. A facility is subject to SPCC regulations if a single oil storage tank has a capacity greater than 660 gallons, the total aboveground oil storage capacity exceeds 1,320 gallons, or the underground oil storage capacity exceeds 42,000 gallons and, because of its location, the facility could reasonably be expected to discharge oil into or upon the “navigable waters” of the United States.

Other federal regulations overseen by USEPA relevant to hazardous materials and environmental contamination include 40 CFR 1(D) (Water Projects) and 40 CFR 1(I) (Solid Wastes). Furthermore, 40 CFR 1(D)(116) sets forth a determination of the reportable quantity for each substance that has been designated as hazardous, and 40 CFR 1(D)(117) applies to quantities of designated substances equal to or greater than the reportable quantities that may be discharged into waters of the United States.

Occupational Safety and Health Administration

The Occupational Safety and Health Administration’s (OSHA’s) mission is to ensure the safety and health of American workers by setting and enforcing standards; providing training, outreach, and education; establishing partnerships; and encouraging continual improvement in workplace safety and health. The OSHA staff establishes and enforces protective standards and reaches out to employers and employees through technical assistance and consultation Projects. OSHA standards are listed in 29 CFR 1910.

3.7.3.2 State

Division of Oil, Gas, and Geothermal Resources

DOGGR is the state agency responsible for supervising the drilling, operation, maintenance, plugging, and abandonment of oil, gas, and geothermal wells. DOGGR’s regulatory program promotes the sensitive development of oil, natural gas, and geothermal resources in California through sound engineering practices, pollution prevention, and the implementation of public safety programs. DOGGR requires any construction above or near plugged or abandoned oil and gas wells to be avoided and the remediation of wells to current DOGGR standards.
Hazardous Materials Release Response Plans and Inventory Act of 1985

The Hazardous Materials Release Response Plans and Inventory Act, also known as the Business Plan Act, requires businesses that use hazardous materials to prepare a plan that describes their facilities, inventories, emergency response plans, and training programs. Hazardous materials are defined as unsafe raw or unused materials that are part of a process or manufacturing step. They are not considered hazardous waste. Health concerns pertaining to the release of hazardous materials, however, are similar to those pertaining to hazardous waste.

Hazardous Materials Transportation

The transport of hazardous materials within the State of California is subject to various federal, state, and local regulations. It is illegal to transport explosives or inhalation hazards on any public highway not designated for that purpose unless the use of the highway is required to permit delivery or the loading of such materials (California Vehicle Code, Sections 31602(b) and 32104(a)). The California Highway Patrol (CHP) designates through routes to be used for the transport of hazardous materials. The transport of hazardous materials is restricted to such routes except in cases where travel from these routes is required to deliver or receive hazardous materials. Information on CHP requirements and regulatory authority is provided under “California Highway Patrol,” below.

Hazardous Waste Control Act

The Hazardous Waste Control Act created the State Hazardous Waste Management Project, which is similar to, but more stringent than, the federal RCRA program. The act is implemented by regulations contained in Title 26 of the California Code of Regulations (CCR), which describe the following aspects of the requirements for the proper management of hazardous waste:

- identification and classification;
- generation and transportation;
- design and permitting of recycling, treatment, storage, and disposal facilities;
- treatment standards;
- operation of facilities and staff training; and
- closure of facilities and liability requirements.

These regulations list more than 800 materials that may be hazardous and establish criteria for identifying, packaging, and disposing of such waste. Under the Hazardous Waste Control Act and Title 26, the generator of hazardous waste must complete a manifest that accompanies the waste from generator to transporter to the ultimate disposal location. Copies of the manifest must be filed with the California DTSC.

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

Senate Bill 1082 (1993) created the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program), which requires the administrative consolidation of six hazardous materials and waste programs (Program Elements) under one agency, a Certified Unified
Program Agency (CUPA). The Program Elements consolidated under the Unified Program are as follows:

- Hazardous Waste Generator and Onsite Hazardous Waste Treatment Programs (i.e., Tiered Permitting);
- Aboveground Petroleum Storage Tank SPCC;
- Hazardous Materials Release Response Plans and Inventory Project (i.e., Hazardous Materials Disclosure or “Community Right-to-Know”);
- California Accidental Release Prevention (CalARP) Program;
- UST Program; and
- Uniform Fire Code Plans and Inventory Requirements.

The Unified Program is intended to provide relief to businesses that comply with the overlapping and sometimes conflicting requirements of formerly independently managed programs. CUPA implements the Unified Program at the local government level. Most CUPAs have been established as a function of a local environmental health or fire department. Some CUPAs have contractual agreements with another local agency (i.e., a participating agency) that implements one or more program elements in coordination with the CUPA.

California Environmental Protection Agency

CalEPA was created in 1991. It unified California's environmental authority in a single cabinet-level agency and brought California Air Resources Board (CARB), SWRCB, Regional Water Quality Control Board (RWQCB), California Department of Resources, Recycling and Recovery (CalRecycle), DTSC, the Office of Environmental Health Hazard Assessment (OEHHA), and the DPR under one agency. These agencies were placed within the CalEPA “umbrella” for the protection of human health and the environment to ensure a coordinated deployment of state resources. Their mission is to restore, protect, and enhance the environment and ensure public health, environmental quality, and economic vitality.

Department of Toxic Substance Control

DTSC, a department of CalEPA, is the primary agency in California for regulating hazardous waste, cleaning up existing contamination, and finding ways to reduce the amount of hazardous waste produced in California. DTSC regulates hazardous waste primarily under the authority of the federal RCRA and the California Health and Safety Code (primarily Division 20, Chapters 6.5 through 10.6, and Title 22, Division 4.5). Other laws that affect hazardous waste are specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning.

USC 65962.5 (commonly referred to as the Cortese List) includes DTSC-listed hazardous waste facilities and sites, Department of Health Services (DHS) lists of contaminated drinking water wells, sites listed by SWRCB as having UST leaks or discharges of hazardous wastes or materials into the water or groundwater, and lists from local regulatory agencies of sites with a known migration of hazardous waste/material.
State Water Resources Control Board

SWRCB is responsible for statewide regulation of water resources. SWRCB’s mission is to “ensure the highest reasonable quality for waters of the State, while allocating those waters to achieve the optimum balance of beneficial uses.” SWRCB thus has joint authority over water allocation and water quality protection. SWRCB supports the efforts of the individual RWQCBs, of which there are nine statewide. These are semiautonomous and consist of Board members appointed by the Governor and confirmed by the Senate. Regional boundaries are based on watershed, and water quality requirements are based on the unique differences in climate, topography, geology, and hydrology for each watershed.

Each RWQCB makes critical water quality decisions for its region, including setting standards, issuing waste discharge requirements, determining compliance with those requirements, and taking appropriate enforcement actions. Water quality standards are defined in each RWQCB’s respective Basin Plan. Basin plans must conform to the policies set forth in the Porter-Cologne Water Quality Control Act (Porter-Cologne Act) and established by SWRCB in its state water policy. The Porter-Cologne Act also provides that an RWQCB may include in its region a Regional Plan with water discharge prohibitions applicable to particular conditions, areas, or types of waste. The RWQCBs are also authorized to enforce discharge limitations, take actions to prevent violations of these limitations from occurring, and conduct investigations to determine the status of quality of any of the waters of the state within their region. Civil and criminal penalties are also applicable to persons who violate the requirement of the Porter-Cologne Act or SWRCB/RWQCB orders.

California Porter-Cologne Water Quality Control Act

The federal CWA places the primary responsibility for the control of water pollution and for planning the development and use of water resources with the individual states, although it does establish certain guidelines for the states to follow in developing their programs.

California’s primary statute governing water quality and water pollution is the Porter-Cologne Act, which grants the SWRCB and RWQCBs broad powers to protect water quality and is the primary vehicle for implementation of California’s responsibility under the CWA. The Porter-Cologne Act grants the SWRCB and RWQCBs the authority and responsibility to adopt plans and policies, regulate discharges to surface and groundwater, regulate waste disposal sites, and require cleanup of discharges of hazardous materials and other pollutants. The Porter-Cologne Act also establishes reporting requirements for unintended discharges of any hazardous substance, sewage, oil, or petroleum product.

California Office of Emergency Services

To protect public health and safety as well as the environment, the California Office of Emergency Services (OES) is responsible for establishing and managing statewide standards for business and area plans related to the handling and release, or threatened release, of hazardous materials. OES requires basic information regarding hazardous materials handled, used, stored, or disposed of (including location, type, quantity, and health risks) to be available to firefighters, public safety officers, and regulatory agencies. Typically, this information should be included in Hazardous Materials Business Plans to prevent or mitigate impacts on the environment or the health and safety of individuals from the release, or threatened release, of these materials into the workplace and environment. These regulations are covered under Chapter 6.95 of the California Health and Safety
Code, Article 1, Hazardous Materials Release Response and Inventory Project (Sections 25500 to 25520), and Article 2, Hazardous Materials Management (Sections 25531 to 25543.3).

Title 19 of the CCR (Public Safety; Division 2; Office of Emergency Services; Chapter 4; Hazardous Material Release Reporting, Inventory, and Response Plans; Article 4 [Minimum Standards for Business Plans]) establishes minimum statewide standards for Hazardous Materials Business Plans. These plans must include the following: a hazardous material inventory; emergency response plans and procedures; and training program information. Hazardous Materials Business Plans should contain basic information regarding the location, type, quantity, and health risks of hazardous materials stored, used, or disposed in the state. Each business will prepare a Hazardous Materials Business Plan if that business uses, handles, or stores a hazardous material or an extremely hazardous material in quantities greater than or equal to the following:

- 500 pounds of a solid substance;
- 55 gallons of a liquid;
- 200 cubic feet of compressed gas;
- a hazardous compressed gas in any amount; and
- hazardous waste in any quantity.

**California Occupational Safety and Health Administration**

The California Occupational Safety and Health Administration (Cal/OSHA) is the primary agency with responsibility for worker safety with respect to the handling and use of chemicals in the workplace. Cal/OSHA standards are generally more stringent than federal regulations. The employer is required to monitor worker exposure to listed hazardous substances and notify workers of exposure (8 CCR 337–340). The regulations specify requirements regarding employee training, the availability of safety equipment, accident-prevention projects, and hazardous substance exposure warnings.

**California Highway Patrol**

Under the California Vehicle Code, Section 32000.5, a valid license to transport hazardous materials, issued by the CHP, is required for the transport of either of the following:

- hazardous materials for which the display of placards is required pursuant to Section 27903; or
- hazardous materials weighing more than 500 pounds for which the display of placards is required.

The CHP enforces additional requirements regarding the transport of explosives, inhalation hazards, and radioactive materials pursuant to the California Vehicle Code. The transport of explosives generally requires consistency with rules and regulations pertaining to routing, safe stopping distances, and inspection stops (14 CCR 6(1)(1150–1152.10)). Inhalation hazards face similar but more restrictive rules and regulations (13 CCR 6(2.5)(1157–1157.8)). The transport of radioactive materials is restricted to specific safe routes.
3.7.3.3 Local

Santa Barbara County Comprehensive Plan

The Santa Barbara County Comprehensive Plan (inclusive of mandatory and optional Elements) addresses public safety, hazardous materials, and fire hazards for the County as a whole, including the coastal area, inland area, and community plan areas.

Seismic Safety and Safety Element

The Seismic Safety and Safety Element (adopted in 1979, republished in May 2009, and amended in August 2010) is intended to guide land use planning by providing pertinent data regarding geologic, soil, seismic, fire, and flood hazards. The Seismic Safety and Safety Element provides information concerning geology, soils, seismicity, and fire and flood hazards of the County, and provides recommendations and criteria to aid in land use planning in order to ensure that future development will be compatible with the environment. The following goals and policies are applicable to the proposed Project:

Fire Protection and Prevention

Goal 1: Protect the community from unreasonable risks associated with the effects of wildland and urban fires pursuant to Government Code 65302 (g)(1).

Fire Policy 1: Continue to pursue and promote County fire prevention projects and control measures.

Fire Policy 2: The County shall use California Department of Forestry and Fire Protection-Fire Hazard Severity

Fire Policy 3: Fire Hazard Severity Zone Maps, as maintained by the California Department of Forestry and Fire Protection, shall be used to illustrate the official areas of Very High Fire Hazard Severity Zones (VHFHSZ) in the Local and State Responsibility Areas.

Fire Policy 4: To reduce the potential for fire damage, the County shall continue to require consistency with County Fire Department Development Standards pursuant to the California Fire Code, Public Resource Code §4291, and Government Code §51175-51188.

Fire Policy 5: The County shall continue to require defensible space clearance around all structures in unincorporated Local Responsibility Areas pursuant to Public Resource Code §4291, and Government Code §51175-51188.

Fire Policy 6: The County should continue to collaborate with the California Department of Forestry and Fire Protection in the revision of VHFHSZ.

Fire Policy 7: The County should strive to maintain partnerships with tribal governments, state, local, and federal agencies to identify, prioritize, and implement fire prevention and protection measures in the County.

Fire Policy 8: The County OES shall continue coordinating emergency planning for the Santa Barbara Operational Area pursuant to the California Emergency Services Act of 1970.

Fire Policy 9: The County shall minimize the potential effects of fire hazards through the development review process pursuant to state law.
Fire Policy 10: The County should reference the Santa Barbara County Multi-Jurisdiction Hazard Mitigation Plan when considering measures to reduce potential harm from fire-related activity to property and lives.

Safety Element Supplement

The Safety Element Supplement was adopted in 2000 and republished in May 2009. It focuses on the role of land-use planning in reducing the risk of public exposure to acutely hazardous materials. It draws upon the County's own experiences and recommended practices of other informed sources to guide consistent and well-informed land-use decisions with regard to public safety. Chapter I addresses facilities that handle acutely hazardous materials and are fixed in location to a single site; and Chapter II addresses gas pipelines, which are considered to be fixed in location to a corridor and, thus, represent a linear source of risk, which extends along the corridor.

The objectives and policies contained in these chapters address the following two goals:

Goal 1: To provide sufficient guidance to affect well-informed, consistent and equitable land use decisions.

Goal 2: To prevent and minimize unnecessary risk to the public, recognizing it is impossible to obtain a zero-risk society.

Policy Hazardous Facility Safety 1-A: Risk Estimates. The County shall employ accurate estimates of risk associated with hazardous facilities to inform discretionary land-use decisions where substantial, preliminary evidence indicates involuntary public exposure to significant risk may result from the land-use decision.

Hazardous Waste Element

The Hazardous Waste Element was adopted in 1990 and republished in May 2009, which emphasizes the need for proper management of current as well as future hazardous wastes with the goal of minimizing the amount of waste generated and reducing the hazard of what is generated. The County Hazardous Waste Management Plan is concerned primarily with hazardous waste issues and not hazardous materials issues. Hazardous wastes are substances of no further intended use which need treatment or disposal, or both, while hazardous materials include new and usable substances. The handling and use of hazardous materials is regulated by a set of legislative and regulatory requirements which falls outside the scope of the Comprehensive Plan. The following goals and policies are relevant to the proposed Project:

Storage of Hazardous Waste

Goal 1: To protect the public health and safety and the environment from risks posed by improper storage of hazardous materials and hazardous waste.

Policy 1: The County and cities shall encourage the proper storage of hazardous materials and hazardous waste through continued inspection efforts and public education regarding proper storage methods and regulations.

Contaminated Sites

Goal 1: To protect public health and safety and the environment from risks due to the presence of abandoned or contaminated sites.
Policy 1: The County and cities should work with other involved agencies to establish a coordinated interagency effort for identification, regulation, mitigation, and notification of contaminated sites.

Policy 2: The County and cities in conjunction with the State Department of Health Services shall encourage onsite treatment and remediation to reduce the transport of hazardous waste from contaminated sites.

Land Use Element - Community Plans

Projects within the following community planning areas would be subject to hazardous materials and fire hazard goals and policies of that 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 Fire Department, Hazardous Waste Unit

The Santa Barbara County Fire Department is certified by CalEPA as the CUPA for the County. The CUPA regulates businesses that handle hazardous materials, generate or treat hazardous waste or operate ASTs or USTs. CUPA requirements can be found in Health & Safety Code (HSC) Chapter 6.11 and CCR, Title 27, Division 1, Subdivision 4, Chapter 1. CUPA is responsible for administering and managing the Hazardous Materials Release Response Plans & Inventory Program, USTs, Hazardous Waste Generators, Onsite Hazardous Waste Treatment, Aboveground Petroleum Storage Act, and CalARP.

Santa Barbara County's Site Mitigation Program

This program is administered by the Environmental Health Division of the County and is responsible for the supervision of cleanup at contaminated sites throughout the County. The goal of the program is to identify contaminated sites, and to find a permanent remedy that is technologically feasible, reliable, and effectively reduces the danger of contamination, and adequately protects public health, welfare, and the environment.

Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan

The County OES prepared the MJHMP. The MJHMP focuses on the assessment of identified risks and implementation of loss reduction measures to ensure critical County services and facilities survive a
disaster. Topics covered in the plan include flood, wildfire, earthquake, coastal storm, surge/tsunami, landslide/coastal erosion and dam failure in the unincorporated areas of the County.

3.7.4 Environmental Impact Analysis

This section discusses the potential hazards impacts associated with the proposed Project.

3.7.4.1 Thresholds of Significance

CEQA Guidelines

Appendix G of the State California Environmental Quality Act (CEQA) Guidelines states that a project is considered to have a significant impact related to hazards if it would result in any of the following:

- create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;
- emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school;
- be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment;
- be located within an airport land use plan area or, where such a plan has not been adopted, be within 2 miles of a public airport or public use airport, and result in a safety hazard for people residing or working in the project area;
- be located within the vicinity of a private airstrip and result in a safety hazard for people residing or working in the project area;
- impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or
- expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

Non-Applicable Thresholds

Private Airstrip or Public Airport: Thresholds related to location within or near a public or private airport or airstrip are not applicable to the Project. Five airports are located within the County: the Santa Maria Public Airport; the public Lompoc Airport; the Santa Ynez Airport; the public New Cuyama Airport; and the public Santa Barbara Airport. Under the Project, cannabis activities could be permitted within a 2-mile radius of airports and airstrips. Under current state law, development near an airport is required to be in conformance with the California Airport Land Use Planning Handbook and airport safety compatibility policies and guidelines for development of uses within the vicinity of an airport (Chapter 3 of the Airport Land Use Plan [ALUP]), as administered by the Santa Barbara
County Association of Governments (SBCAG) and the regional Airport Lane Use Commission (ALUC), which oversees implementation of the County ALUP. These requirements would ensure that cannabis operations and associated worker populations are not exposed to airport related hazards or pose additional hazardous risk to the safety and operation of local airports. Therefore, due to existing California regulations and restrictions for airport operations and the County ALUP, impacts associated with airport hazards resulting from implementation of the Project are considered insignificant and are not discussed further in this EIR.

**County of Santa Barbara Environmental Thresholds and Guidelines**

The County’s Environmental Thresholds and Guidance Manual (County of Santa Barbara 2008, updated in 2015) includes thresholds for public safety, as summarized and presented below, that are relevant in determining Project impacts related to hazards.

**Public Safety**

Impacts from risks stemming from the following facilities and activities would be significant if (a) they are subject to a discretionary land-use action (or would communicate its concerns for public safety to another jurisdiction that is making a discretionary decision such as routes for shipping hazardous materials), and (b) initial analysis reveals substantial evidence to support a fair argument that the potential of a significant impact to public safety could result from approval of the project subject to such action:

1. oil wells and gas wells (unless abandoned or undergoing abandonment), and associated production;
2. gas and hazardous liquids pipelines, including oil if a significant risk is expected, but exempting existing natural gas pipelines owned by a Californian public utility regulated by the California Public Utilities Commission and operated for the purpose of delivering gas directly to the Goleta storage field or consumers (except activities related to liquefied natural gas), and exempting new low pressure distribution pipelines (125 pounds per square inch gauge [psig] or lower) operated by a Californian public utility and regulated by the California Public Utilities Commission;
3. oil and/or gas processing and storage facilities, including facilities for removing sulfur, removing gas liquids, and compressing gas;
4. oil refineries;
5. handling, storage, and transport of compressed natural gas or methanol related to facilities for refueling motor vehicles with these materials;
6. all handling, storage, and transport of chlorine in containers with a capacity of one ton or more, or an equivalent amount of chlorine in bottles or cylinders connected through a common header;
7. handling, storage, and transport of anhydrous ammonia in containers with a capacity of one ton or more, or an equivalent amount of anhydrous ammonia in bottles or cylinders connected through a common header;
8. handling, storage, and transport of acutely hazardous rocket propellants such as nitrogen tetroxide (including instances where the County would communicate with other jurisdictions...
about discretionary actions that affect public safety in this County such as designation of routes for transporting hazardous materials);

9. handling, storage, and transport of spent radioactive fuel and other high-level, radioactive materials (including instances where the County would communicate with other jurisdictions about discretionary actions that affect public safety in this County such as the designation of route for transporting hazardous materials);

10. storage of natural gas liquids, including liquefied petroleum gas, unless such storage is limited to a single container with a maximum capacity of 10,000 gallons or less and does not require refilling more than once weekly;

11. facilities of a type not addressed in 1-10 above, and not exclusively dedicated to retail distribution of consumer products (e.g., gasoline stations, or hardware, paint, and dry-cleaning stores) that: (a) use a classified Class A or B explosive (per Title 49, CFR, 171-179); or (b) use substances classified as high-level radioactive materials; or (c) use specified quantities of regulated substances (pursuant to Title 19 of the CCR, Division 2, Chapter 4.5) and meet all of the following criteria:

a. the regulated substance(s) is stored as a compressed gas or liquefied compressed gas, or is expected to vaporize or evaporate quickly upon release (e.g., through failure of container, piping, or valve), or is stored as a liquid at a temperature that exceeds its boiling point;

b. the regulated substance(s) has the potential to cause a significant risk to public safety according to the County’s environmental thresholds (for example, the regulated substance(s) exists as a gas or vapor upon accident release, and will either release into the open atmosphere or become dangerously explosive in a confined environment);

c. the regulated substance(s) is associated with a specific activity that is generally considered to be incompatible with surrounding land uses; or

12. all development proposed in proximity to one or more existing hazardous facilities as described above, unless (a) the hazardous facility(ies) are inoperative for the purpose of abandonment, or (b) the proposed development is a single family residential unit which the County considers to be a voluntary exposure to the hazardous facility, or (c) the proposed development does not require a discretionary land-use action.

In cases 1 through 11 listed above, these thresholds apply to risks imposed on present and reasonably projected future land use, considering principally permitted uses under current zoning along with any conditional uses that are permitted or under review.

With regard to land uses with transitory populations (e.g., parks, roads, pedestrian and bike paths), these thresholds apply only when these populations are considered to be often present or often flow continuously (e.g., a frequently used recreational park or frequently traveled road). They do not apply when transitory populations are considered to be sporadic or often absent (e.g., hiking trails and other uses where the infrequent presence of people renders inclusion herein as overly speculative).

These thresholds do not apply to occupational safety (i.e., employees of the hazardous facility or people who visit the hazardous facility to provide services or conduct business).

In addition, impacts would be significant if a risk analysis conducted for a project results in a societal risk spectrum that falls in the amber or red zones of the public fatality or public injury risk spectrums.
as presented in Figures 1 and 2 of the Public Safety Thresholds section of the County of Santa Barbara Environmental Thresholds and Guidelines Manual (County of Santa Barbara 2008).

### 3.7.4.2 Project Impacts

This section discusses the potential hazardous impacts associated with the Project. A detailed discussion of each impact follows. Table 3.7-2, below, provides a summary of the impacts related to hazards and hazardous materials related to the proposed Project.

#### Table 3.7-2. Summary of Hazards and Hazardous Materials Impacts

<table>
<thead>
<tr>
<th>Hazards and Hazardous Materials Impact</th>
<th>Mitigation Measures</th>
<th>Residual Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Impact HAZ-1. Potential adverse impacts could result from prior use, storage, or discharge of hazardous materials on lands subject to future cannabis activities.</td>
<td>No mitigation required</td>
<td>Less than significant (Class III)</td>
</tr>
<tr>
<td>Impact HAZ-2. Potential adverse impacts could result from former oil or gas pipelines or well facilities on lands subject to cannabis activities.</td>
<td>No mitigation required</td>
<td>Less than significant (Class III)</td>
</tr>
<tr>
<td>Impact HAZ-3. Potential adverse impacts could result from use, storage, or distribution of hazardous or toxic materials for cannabis activities.</td>
<td>MM HAZ-3. <em>Volatile Manufacturing Employee Training Plan</em></td>
<td>Less than significant with mitigation (Class II)</td>
</tr>
<tr>
<td>Impact HAZ-4. Potential adverse impacts could result from cannabis activities that may be located within high fire hazard areas, exposing people or structures to significant risks involving wildland fires.</td>
<td>No mitigation required</td>
<td>Less than significant (Class III)</td>
</tr>
<tr>
<td>Cumulative Impacts</td>
<td>No mitigation required</td>
<td>Less than significant (Class III)</td>
</tr>
</tbody>
</table>

#### Impact HAZ-1. Potential adverse impacts could result from prior use, storage, or discharge of hazardous materials on lands subject to future cannabis activities.

Cannabis activities on eligible lands could occur on sites that have stored or discharged hazardous materials, which could be released. However, most facilities that store, use, and dispose of hazardous materials have complied with appropriate federal, state, and local regulations, such as the regulations described in Section 3.7.3, *Regulatory Setting*, to ensure safety of the surrounding public and environment. These regulations are designed to prevent hazardous materials from being handled, transported, used, or disposed in such a way as to jeopardize or cause injury to others or the environment. In cases where the handling, transport, use, and disposal of hazardous materials have resulted in the contamination of the local area, federal, state, and local regulations require disclosure of the extent and severity of contamination, identification of a remediation plan to mitigate hazards and hazardous materials, and continued compliance and monitoring of the mandated plan.

Nevertheless, cannabis activities could occur on parcels on which there is an existing permitted use or past release of hazardous materials, such as sites regulated under ILRP and RCRA regulations, or included on a list compiled pursuant to Government Code 65962.5. Cannabis activities in areas of known hazardous contamination could result in the potential release of hazardous materials through the disturbance of contaminated surface soils or the extraction of contaminated groundwater which
could subject workers, neighboring land uses, and future cannabis users to exposure to hazardous substances. As required under existing federal, state, and local regulations, sites of known hazardous contamination are required to ensure safety of the future uses, surrounding public, and the environment through investigation and remediation prior to allowance and future operation of land uses on such sites. Additionally, all sites proposed for cannabis operations would undergo review processes as part of the proposed Permitting Program and the County's existing permit review processes to ensure future uses are compatible with the history of the site and do not pose a substantial threat to humans or the environment from the risk of release of hazardous materials. Given the application of federal, state and local regulations, impacts would be less than significant (Class III).

Impact HAZ-2. Potential adverse impacts could result from former oil or gas pipelines or well facilities on lands subject to cannabis activities.

Active well fields and plugged and abandoned oil wells can be found throughout the County. It is expected that any development located near an active well field would comply with the procedures and regulation of DOGGR. To ensure development compliance with these requirements, DOGGR developed the Construction-Site Plan Review Program. This program assists local permitting agencies in identifying and reviewing the status of oil or gas wells located near or beneath proposed structures. Prior to issuing building or grading permits, local permitting agencies would review and implement DOGGR's preconstruction well requirements. Local permitting agencies working in conjunction with DOGGR would help to resolve land-use issues and allow for responsible development in oil and gas fields.

Among DOGGR's Construction Site Plan Program are the following development requirements:

- The developer is required to submit a fully completed Well Review Program application to DOGGR;
- The developer is required to locate all known wells located on the development site property; and
- DOGGR will evaluate all known wells located on the development site property. The evaluation process consists of (1) verifying the wells have a competent surface plug, and (2) verifying the wells are not leaking any fluids or gas.

Compliance with these requirements and County policies and permit review processes would ensure impacts associated with permitting of cannabis operations near potentially hazardous oil or gas facilities are less than significant (Class III).

Impact HAZ-3. Potential significant impacts could result from use, storage, or distribution of hazardous or toxic materials for cannabis activities.

Potential impacts associated with cannabis activities would result from construction and operation of cannabis cultivation, manufacturing, testing, retail, and distribution facilities and associated ancillary facilities. Construction and operation of facilities under the Project could involve the routine transport, use, storage, and disposal of hazardous materials such as butane, fuel, solvents, paints, oils, and grease. Varying amounts of these materials could be utilized on cannabis sites during construction and operation. For example, the operation of cannabis product manufacturing can involve volatile processes that include the use and storage of highly flammable materials. Volatile processes such as production of BHO and high-pressure supercritical CO₂ extract can involve the use of hazardous
materials and involve some risk of explosion. Ethanol, butane, propane, and other natural gases, as well as isopropyl alcohol, hydrogen, and liquid nitrogen may be used, which may pose safety risks. Furthermore, cannabis cultivation under the Project could result in impacts from the use, storage, transport, or discharge of hazardous materials, particularly with respect to the use of rodenticides, fungicides, herbicides, insecticides, fertilizers, and other agricultural chemicals. Other activities to be potentially permitted under the Project would involve the handling, storage, use, and disposal of hazardous materials such as commercial chemicals or household cleaning supplies.

Required conformance with existing federal, state, and local regulations, as well as Project requirements, would reduce these impacts. Cannabis cultivation would be subject to existing laws and regulations governing the cultivation and associated hazardous activities, including the ILRP regulated under the RCRA, and pesticide use regulations under USEPA and CalEPA regulate the use of pesticides, fertilizers, and other hazardous materials used in the cultivation of food and non-food agricultural products to ensure the safety of employees, consumers, adjacent uses, and the environment, while OSHA regulates permitted businesses to ensure the health and safety of employees from occupational hazards.

Zone districts considered eligible for cannabis operations have been assigned based on consideration of the type of cannabis activities and their compatibility with other uses allowed within such zones. For instance, testing and retail licenses are proposed for eligibility within commercial, manufacturing, and mixed-use zoned districts, which may currently accommodate a range of retail uses with similar hazardous conditions. (Refer to Chapter 2, Project Description.) In some cases, the Project may result in the introduction of cannabis activities within zones that may result in additional risk to/from hazards. However, in all cases, compliance with federal, state, and local regulations, as well as site-specific review as part of the County’s permitting process would minimize impacts to hazards and hazardous materials, and allow for identification of potential future environmental review. In addition, proposed development standards include specific setback requirements for non-volatile and volatile manufacturing processes, which are considered to have the greatest threat from hazards and release of hazardous materials, from sensitive populations which would further serve to reduce risks from such operations. Cannabis activities would be subject to review and permitting by the County, compliance with federal and state regulations relating to employee health and safety, and existing County policies and regulations related to site design, setback requirements, site location, construction and operation of facilities, types of allowed operations, and the general operation of each activity.

Despite the federal, state and local regulations which must be adhered to, volatile components of cannabis processing and manufacturing could still lead to a potentially significant impact. Therefore, mitigation measure **MM HAZ-3, Volatile Manufacturing Employee Training Plan**, would be required.

**Impact HAZ-4. Potential adverse impacts could result from cannabis activities that may be located within high fire hazard areas, exposing people or structures to significant risks involving wildland fires.**

Project impacts could result from operation of existing or new cannabis activities within areas identified as being at increased threat from fire hazards or located within wildland-urban interface areas, particularly where there may be heavy fuel loads in areas that have not historically or recently burned. Cannabis activities would be eligible for a license on parcels subject to various levels of fire hazard. Fires in these areas could expose cannabis cultivators, manufacturers, retailers, distributers, testers, and employees, neighboring populations, as well as wildlife populations and habitat to fire
hazards. Location of cannabis-related activities in more remote areas could increase difficulty with
emergency evacuations, particularly within areas of narrow rural roads and limited access, such as
Tepusquet Canyon or along the Gaviota Coast. Further, cannabis activities could introduce new
ignition sources to rural areas, including electrical power, machinery, and operators and employees,
incrementally increasing the potential for accidental wildfire ignition.

Cannabis cultivation conducted both outdoors or in hoop structures and greenhouses has low risks
for fire akin to agricultural uses. Cannabis-related structures, including drying sheds, barns, and other
agricultural structures, typically have few sources of ignition and are not inhabited, which
substantially reduces the risk of fire. Indoor cultivation, manufacturing, retail, testing, and
distribution retain higher risk for fire, as these activities require electricity/wiring and/or store
flammable/explosive materials onsite. The electrical infrastructure that is required for indoor
cannabis activities creates incremental additional risk of ignition of structure fires or wildfires, which
is especially important where indoor cultivation is located in wildland interface areas where fire risk
is elevated. Some sites may also include manufacturing activities using higher fire risk methods, such
as open blast BHO production. However, indoor cannabis activities would occur within permitted
structures subject to building codes, electrical codes, and review by the Fire Department. Potential
impacts would therefore be addressed or avoided through proper implementation of existing codes
and standards, and would not interfere with County emergency response or evacuation plans.
Regulations of the Medicinal and Adult-Use Cannabis Regulations and Safety Act (MAUCRSA) would
require cannabis manufacturers to operate only equipment that has been certified by a professional
engineer and are built to codes of recognized and generally accepted good engineering practices.

Cannabis activities would also be subject to existing policies and regulations pertaining to fire
protection, including road standards, vegetation management, and water supply for fire suppression.
Zoning permits would be required to avoid interference with implementation of County emergency
and evacuation plans. For those Projects with development greater than 20,000 square feet (sf), a
Development Plan would be required by the County in addition to zoning permits. Policies,
regulations, and/or standards such as the MJMHP, Seismic Safety and Safety Element, and Montecito
Community Plan would facilitate emergency response and preparedness in affected areas, especially
in critical fire hazard areas. Because licensed cannabis activities would be required to comply with
CalFire defensible space requirements, County Building Code, and County Fire Code regulations to
ensure protection of proposed facilities from wildfire hazards, impacts to the siting of new facilities
and operations would be less than significant (Class III). In addition, as described in MM HAZ-3 volatile
manufacturing operators are required to develop a Volatile Manufacturing Employee Training Plan
which identifies how operators would train their employees on the proper use of equipment and on
the proper hazard response protocols in the event of equipment failure. While not required to mitigate
this impact, this would further reduce the risk of ignition or explosion from extraction processes.

### 3.7.4.3 Cumulative Impacts

As described in Section 3.0 Environmental Impact Analysis, the cumulative setting for the Project
involves a variety of policies and initiatives in the County, as well as future development projects.
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 licensed cannabis activities would occur
given the potential for growth in the agricultural and manufacturing industries under the Project. The
County is also considering changing the Land Use and Development Code by requiring hoop structures above 20 feet high to have a permit, while hoop houses less than 20 feet high will not be required to have a permit (County of Santa Barbara 2017). Additionally, unlimited cultivation area licenses (Type 5 license) will be permitted starting in 2023. Increased buildout under these licenses would increase the likelihood that hazardous materials would be disturbed, increase fire risks, and increase the use, transport, and discharge of hazardous materials.

Concurrent pending development of agricultural, commercial, institutional, industrial, and residential land uses could potentially result in conflicts related to hazards and hazardous materials when considered cumulatively. The potential for cumulative development in the County could lead to the use of hazardous materials or the release of hazardous substances into the environment or the introduction of new development in areas subject to existing hazards such as critical fire hazard areas and hazardous contamination sites. However, County permits require review for potential effects of hazards and hazardous materials, which may be located on a project site due to historic and/or current uses that have existed or currently exist on a site. Similar to the Project, pending projects are subject to federal, state, and local policies and regulations pertaining to use of hazardous materials, remediation of hazardous contamination sites, and engagement in hazardous activities, to minimize impacts including release or exposure to hazardous substances. Given all development is subject to compliance with such policies and regulations as part of project entitlements, including inspection by County fire agencies to ensure adequate protection from fire hazards, and with implementation of MM HAZ-3, 

**3.7.4.4 Proposed Mitigation**

**MM HAZ-3: Volatile Manufacturing Employee Training Plan.** Cannabis activities dealing in volatile manufacturing shall develop a Volatile Manufacturing Employee Training Plan (Training Plan) and submit to the County as part of the permitting and licensing process. The Training Plan shall detail how the licensed volatile manufacturing operators will train their employees on the proper use of equipment and on the proper hazard response protocols in the event of equipment failure, per established OSHA standards. The Training Plan shall include a log, identifying trained employees and the date upon which training was completed.

**Requirements and Timing.** Prior to issuance of a permit or license (whichever occurs first) by the County, the Employee Training Plan shall be reviewed and approved by the Planning and Development Department and the applicant shall record a covenant, subject to Planning and Development Department and County Counsel approval, to implement the Training Plan. The Training Plan shall be reviewed and implemented prior to licensing and permitting, with approval renewed annually.

**Monitoring.** The Planning and Development Department shall review and approve the Volatile Manufacturing Employee Training Plan. The County shall review site conditions and the Training Plan log on an ongoing basis to ensure compliance with MM HAZ-3.

**3.7.4.5 Residual Impacts**

Impacts HAZ-1, HAZ-2, and HAZ-4. Implementation of existing federal, state, and local regulations, proposed development standards, licensing review processes of the proposed Licensing Program, and
standard permit processes and conditions of the County, would ensure impacts of the Project with regard to hazards and hazardous materials are less than significant (Class III).

Impact HAZ-3. With the implementation of **MM HAZ-3, Volatile Manufacturing Employee Training Plan**, which would require employees working in volatile manufacturing to be trained on the proper use of equipment and hazard response protocols in event of equipment failure, along with implementation of existing federal, state, and local regulations, as well as the proposed development standards, licensing review processes of the proposed Licensing Program, and standard permit processes and conditions of the County, all impacts of the Project with regard to hazards and hazardous materials would be less than significant with mitigation (Class II).