4.1 Introduction

Section 15126.6 of the California Environmental Quality Act (CEQA) Guidelines requires that an Environmental Impact Report (EIR) describe a range of reasonable alternatives to the project or to the location of the project that could feasibly avoid or lessen any significant environmental impacts while attaining the basic objectives of the project. This chapter describes three potential alternatives to the Cannabis Land Use Ordinance and Licensing Program (Project), including the No Project Alternative, analyzes potential environmental impacts resulting from the alternatives, and compares the degree of impact relative to the Project. From this analysis, this section also identifies the Environmentally Preferred Alternative, consistent with CEQA. The purpose of this section is to provide sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Project to inform the County’s policy and decision-making process.

Key provisions of Section 15126.6 of the State CEQA Guidelines, which pertain to the alternatives analysis, are summarized below.

- The discussion of alternatives will focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if those alternatives would impede to some degree the attainment of the project objectives or would be more costly.

- The “No Project Alternative” will be evaluated, along with its impacts. The No Project Alternative analysis will discuss the existing conditions at the time the Notice of Preparation (NOP) was published, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.

- The range of alternatives required in an EIR is governed by a “rule of reason;” therefore, the EIR must evaluate only those alternatives necessary to permit a reasoned choice. Alternatives will be limited to ones that would avoid or substantially lessen any of the significant effects of the project.

- For alternative locations, only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.

- An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative.

Alternatives to the Project were identified, screened, and either retained for further analysis or discarded, as described below. Alternatives were developed based on: information provided by the County; input received from comments on the NOP; feedback from the local cannabis industry; and review of other agency cannabis regulations and industry sources. The alternatives screening process consisted of the following steps:

**Step 1:** Define the alternatives to allow comparative evaluation.
Step 2: Evaluate each alternative using the following criteria:

- The extent to which the alternative would accomplish most of the basic goals and objectives of the Project (Section 2.3.1, Project Objectives);
- The feasibility of the alternative, taking into account site suitability, economic viability, availability of infrastructure, General/Local Coastal Plan consistency, and consistency with other applicable plans and regulatory limitations; and
- The extent to which the alternative would avoid or lessen one or more of the significant environmental impacts of the Project.

Step 3: Determine the suitability of the proposed alternative for full analysis in the EIR based on Steps 1 and 2 above. Alternatives considered unsuitable were discarded, with appropriate justification, from further consideration. The State CEQA Guidelines require the consideration of a “no project” alternative and to identify, under specific criteria, an “environmentally superior” alternative. If the environmentally superior alternative is determined to be the “no project” alternative, CEQA Guidelines Section 15126.6 requires that the EIR also identify an environmentally superior alternative among the other alternatives.

Feasible alternatives that did not clearly offer the potential to reduce significant environmental impacts and infeasible alternatives were removed from further analysis. In the final phase of the screening analysis, the environmental advantages and disadvantages of the remaining alternatives were weighed with respect to their potential for overall environmental advantage, technical feasibility, and consistency with Project objectives.

At the alternatives screening stage, it is not possible to evaluate potential impacts of the alternatives or the Project with any measure of certainty; however, it is possible to identify elements of the Project that are likely to be sources of impacts. A preliminary assessment of potential significant effects of the Project was also considered in the development of alternatives. Additionally, the technical and regulatory feasibility of various potential alternatives was assessed at a general level. Specific feasibility analyses were not needed for this purpose. Any alternative with infeasible characteristics was disregarded. CEQA does not require elimination of a potential alternative based on cost of construction and operation/maintenance. For the Project, characteristics used to eliminate alternatives from further consideration included:

- Limited effectiveness in reducing environmental impacts;
- Feasibility and safety;
- Permitting feasibility;
- Potential adverse effects on resources;
- Potential effects on public health and safety;
- Potential for inconsistency with adopted agency plans and policies; and
- Feasibility when compared to other alternatives under consideration.

The range of feasible alternatives is selected and discussed in a manner that fosters meaningful public participation and informed decision-making.
4.1.1 Project Objectives

The objectives for the Cannabis Land Use Ordinance and Licensing Program (Project) are presented in Chapter 2, Project Description, and reiterated here for reference:

1. Develop a robust and economically viable legal cannabis industry to ensure production and availability of high quality cannabis products to help meet local demands, and, as a public benefit, improve the County’s tax base;

2. Provide opportunities for legal commercial cannabis cultivation, testing, packaging, transportation, distribution, manufacturing, and retail sale in appropriate unincorporated areas of the County, consistent with state law and County regulations;

3. Develop a new regulatory program allowing for the orderly development and oversight of commercial cannabis activities and businesses, consistent with state law and existing agricultural industry practices, standards, and regulations;

4. Encourage commercial cannabis businesses to operate legally and secure a license to operate in full compliance with County and state regulations, maximizing the proportion of licensed activities and minimizing unlicensed activities;

5. Provide an efficient, clear, and streamlined commercial cannabis licensing and permit process and attainable regulations and standards to facilitate participation by commercial cannabis businesses in the unincorporated areas of the County;

6. Minimize adverse effects of commercial cannabis activities on the natural environment, natural resources, and wildlife, including riparian corridors, wetlands, sensitive habitats, and water resources;

7. Promote energy and resource efficiency in all cannabis activities, consistent with existing agricultural and other industry practices, standards, and regulations;

8. Establish land use requirements for commercial cannabis activities to minimize the risks associated with criminal activity, degradation of visual resources and neighborhood character, groundwater basin overdraft, obnoxious odors, noise nuisances, hazardous materials, and fire hazards;

9. Develop a regulatory program that protects the public health, safety, and welfare through effective enforcement controls (i.e., ensuring adequate law enforcement and fire protection services) for cannabis activities in compliance with state law, to protect neighborhood character and minimize potential negative effects on people, communities, and other components of the environment; and

10. Limit potential for adverse impacts on children and sensitive populations by ensuring compatibility of commercial cannabis activities with surrounding existing land uses, including residential neighborhoods, agricultural operations, youth facilities, recreational amenities, and educational institutions.
4.1.2 Summary of Potentially Significant and Unavoidable Impacts

Based on the analysis provided in this EIR, the Project would result in potentially significant and unavoidable impacts related to agricultural resources (Section 3.2, Agricultural Resources); air quality (Section 3.3, Air Quality and Greenhouse Gas Emissions); noise (Section 3.10, Noise); and transportation and traffic (Section 3.12, Transportation and Traffic). In addition to these project impacts, cumulative significant and unavoidable impacts were identified to aesthetics and visual resources (Section 3.1, Aesthetics and Visual Resources). This EIR identifies the following significant and unavoidable project impacts:

- **Agricultural Resources.** The Project may result in the cumulative loss of prime soils due to the eligibility for hard surface building floors to be installed on agriculturally productive soils;

- **Air Quality.** The Project would be potentially inconsistent with the Regional Clean Air Plan, the County Land Use Element Air Quality Supplement, and the Energy and Climate Action Plan; emissions from operations of cannabis activities could potentially violate an air quality standard or substantially contribute to an air quality violation, and result in a cumulatively considerable net increase of a criteria pollutant for which the County is in nonattainment; cannabis activities could potentially expose sensitive receptors to substantial pollutant concentrations and create objectionable odors affecting a substantial number of people;

- **Noise.** Cannabis activity facilities would have a long-term increase in noise from traffic on vicinity roadways; and

- **Transportation and Traffic.** The Project may result in increases in traffic and daily vehicle miles of travel that affect the performance of the existing and planned circulation system; cannabis activities may result in adverse changes in the traffic safety environment.

4.1.3 Alternatives Considered and Discarded

As discussed above, Section 15126.6(c) of the CEQA Guidelines requires that an EIR disclose alternatives that were considered and rejected, and provide a brief explanation as to why such alternatives were not fully considered in the EIR. The following alternatives were considered but eliminated from further analysis by the County:

1. **Residential Cultivation (Cottage Industry) Alternative** – Under this alternative, commercial cannabis cultivation would be permitted in selected residential zone districts, particularly those with larger lots where cannabis cultivation could potentially be accommodated while minimizing potential for neighborhood conflicts. This alternative’s intent would be to support the cannabis industry in all areas of the County, including residential neighborhoods. Under this potential alternative, cultivation could occur within single-family residential neighborhoods in urban areas, as well as some Residential Ranchette zones within rural areas of the County. These residential neighborhoods would occur within unincorporated communities such as Casmalia, Orcutt, Garey, Sisquoc, and Tepusquet in the Santa Maria Valley; Vandenberg Village and Mission Hills in the Lompoc Valley; Ballard, Los Alamos, Los Olivos, and Santa Ynez in the Santa Ynez area; Cuyama, New Cuyama, and Ventucopa in the Cuyama Valley; and Gaviota, Eastern Goleta Valley, Hope Ranch, Mission Canyon, Toro Canyon, Montecito, and Summerland in the South Coast region. Cannabis cultivation would be licensed within structures such as existing attached garages that
are constructed consistent with the Santa Barbara County Code (County Code). Multiple family zoning districts, such as the two-family residential (R-2) and Design Residential (DR) and Planned Residential Development (PRD) zones would not be considered under such an alternative as these zones permit attached units that could have cultivation in close proximity to, or along the same walls as adjacent units. Further, these zone districts may not have private stand-alone garages, or may have garages which utilize heating, ventilation, and air conditioning (HVAC) units for ventilation, odor control, and cooling that could be proximate to shared walls which would create compatibility issues. To address consistency and compliance with the County Code, this alternative could build on the current Cottage Industry cultivation category to permit a limited level of residential cultivation while balancing environmental, public service, and quality of life concerns.

This alternative was discarded as it could potentially increase land use compatibility impacts and would not meet key Project objectives. This would include Project Objective No. 8, which states: “Establish land use requirements for cannabis activities to minimize the risks associated with criminal activity, degradation of visual resources and neighborhood character, groundwater basin overdraft, obnoxious odors, noise nuisances, hazardous materials, and fire hazards.” Permitting cannabis cultivation and manufacturing in residential zones could increase criminal activity and the perception of the potential for increased criminal activity by residential neighbors. Even accounting for potentially well-managed garage grows, allowing cannabis activities in single-family residential neighborhoods could lead to potentially significant land use conflicts, expose children to cannabis activities, and result in an increase in odor and traffic complaints, thereby degrading the neighborhood character of a community. Further, allowing residential “garage grows” could conflict with Project Objective No. 9, which states, “Develop a regulatory program that protects the public health, safety, and welfare through effective enforcement controls (i.e., ensuring adequate law enforcement and fire protection services) for cannabis activities in compliance with state law, to protect neighborhood character and minimize potential negative effects on people, communities, and other components of the environment.” It would also conflict with Project Objective No. 10, which states, “Limit potential for adverse impacts on children and sensitive populations by ensuring compatibility of cannabis activities with surrounding existing land uses, including residential neighborhoods, agricultural operations, youth facilities, recreational amenities, and educational institutions.” Interspersing cannabis grows within residential zones would result in potential negative effects on the people residing in those communities, and specifically impact children, seniors, and other sensitive populations to cannabis activities and create the possibility of increased potentially significant impacts related to odors. In addition, residential zones typically support many school sites which—even with required setbacks—would incrementally increase exposure of children to cannabis activities.

In permitting larger scale cannabis activities proximate to large concentrations of residential units, this potential alternative could incrementally increase impacts related to safety, noise, air quality, and land use compatibility beyond those of the Project. Additionally, the results of the 2017 Cannabis Registry (Registry) did not indicate a substantial portion of the applicants were located in residential zones. Finally, early public comment on the NOP from residents of neighborhoods indicated strong concerns over the potential impacts of allowing larger grows in such locations. Therefore, this potential alternative was discarded from further consideration.

Eliminate Coastal Zone Alternative – Under this alternative, all cannabis activities would be prohibited within the Coastal Zone. This alternative would preserve existing Coastal Zone agricultural land and developed agricultural infrastructure for production of more traditional
agricultural crops and products; and it would eliminate the need for any future approvals from the California Coastal Commission. Consistent with Ordinance No. 4808 in the Coastal Zone Ordinance (CZO), which currently bans dispensaries in the Coastal Zone, this alternative would continue to disallow all new cannabis cultivation, manufacturing, distribution, retail sales, and testing throughout the Coastal Zone. All other unincorporated regions of the County, except within the Coastal Zone boundary, would be eligible for licensing as proposed under the Project. As such, this alternative would not involve any amendments to the CZO.

This alternative was discarded from further consideration in favor of Alternative 1 – Exclusion of Cannabis Activities from the AG-I Zone District Alternative. Much of the eligible area for cannabis activities in the Coastal Zone is within the AG-I zoning district. Notably, the existing cannabis activities in the Coastal Zone are located almost exclusively on lands with an AG-I designation. As such, the Eliminate Coastal Zone Alternative would essentially be a subset of Alternative 1. Since many of the comments received on the NOP expressed concerns regarding cannabis activities in the coastal and inland AG-I zones, the Exclusion of Cannabis Activities from the AG-I Zone District Alternative was selected for further analysis. Through the screening process described in Section 4.1 above, the alternatives that are analyzed in this EIR were determined to provide the best scenarios to represent the different planning approaches that have been considered thus far in the development of the Project.

**Personal Use Licensing Required Alternative** – Under state law, Proposition 64 legalizes cannabis for use by adults 21 or older, including the cultivation of up to six cannabis plants for personal use per residential dwelling/property, but also allows local jurisdictions to create “reasonable regulations” to limit personal cultivation. Under this alternative, all other components of the Project would remain as described in Chapter 2, Project Description; however, individuals would also be required to obtain a local license to grow the state-allowed six plants for personal use, in order to enable regulatory oversight of all personal cannabis activities and assist in tracking the presence and production of cannabis within the County. While a few stakeholders have requested that the Project include this component, a licensing requirement for personal use was never part of the scope or direction from the County Board of Supervisors (Board). On February 14, 2017, the Board established a temporary Ad Hoc Subcommittee on cannabis which met regularly through August 2017 to, in part, define the scope and objectives of the Project. The Ad Hoc Subcommittee held three public meetings, in addition to the two NOP scoping meetings, to engage the community and receive public input on the Project. With the exception of concerns about the effects of outdoor cultivation, neither members of the Ad Hoc Subcommittee nor members of the public expressed concerns about personal use cultivation. Rather, the focus throughout the planning process has been on commercial cannabis activities. As a result, this alternative would not achieve the objectives of the Project. This alternative would specifically conflict with Project Objective No. 3, which would develop a new regulatory program allowing for the orderly development and oversight of cannabis activities and businesses, consistent with state law and existing agricultural industry practices, standards, and regulations. Should the Board determine that reasonable regulations to limit personal cultivation are needed, then this component could be evaluated as a separate project.

**No Cannabis Activities with Enhanced Enforcement Program** – This alternative would fully ban all cannabis operations Countywide. Ordinance No. 4954 added Article X, titled “Medical Marijuana Regulations,” to Chapter 35, Zoning, of the County Code, which prohibited the cultivation and delivery of medical cannabis, except for cultivation for personal medicinal use in accordance with the Medical Marijuana Regulation and Safety Act (MMRSA), the Federal
Controlled Substances Act (CSA), and Medical Marijuana Program Act. However, under this alternative, it is anticipated that Article X would be repealed or replaced with an outright ban on all cannabis activities, including those qualified or designated as legal nonconforming uses, by the year 2019. Under this alternative, no cannabis activities would be allowed after 2019, with the exception of those cannabis activities preempted by state law. In addition, this alternative would involve an expanded law and code enforcement program to attempt to actively terminate unlicensed cannabis operations.

While this alternative would be considered consistent with several of the Project objectives (Objectives No. 8, 9, and 10) relating to establishing regulations on cannabis activities and reducing impacts to children and sensitive populations, this alternative was discarded as it would directly conflict with and not meet many of the other objectives of the Project. This would include Project Objective No. 2 which states: "Provide opportunities for legal cannabis cultivation, testing, packaging, transportation, distribution, manufacturing, and retail sale in appropriate unincorporated areas of the County, consistent with state law and County regulations." An outright ban on all cannabis activities would directly conflict with this objective through the creation of a prohibition on all cannabis operations. As a likely result of implementation of this alternative, it is reasonable to assume that many operators would relocate existing cannabis operations and continue to seek to operate as unlicensed operations resulting in potential increases in illegal and unlicensed activities within the County with related and exacerbated adverse environmental impacts, such as illegal grading and land clearing, traffic, use of hazardous materials, and unchecked demand for utilities and public services (i.e., fire protection and law enforcement services). Further, increased enforcement appears to be of doubtful effectiveness as more than 30 years of local, state, and federal government enforcement efforts, including the War on Drugs and Campaign Against Marijuana Planting (CAMP), have failed to extinguish or significantly diminish cannabis-related activities. Despite majority public support for legalization, it is doubtful that an increased enforcement campaign, lacking the resources of even past failed efforts, would effectively halt or significantly slow cannabis-related activities, particularly considering the lack of tax revenue generated from the licensing of cannabis operations as under the proposed Project which may help to fund an increased enforcement campaign under this alternative.

Further, prohibiting cannabis could conflict with Project Objectives No. 1, 3, and 4, which are focused on the development of a robust and legal cannabis industry, the establishment of a regulatory program that would produce and meet current market demands for cannabis and improve the County’s tax base, and encouraging cannabis businesses to operate legally and secure a license to operate in full compliance with County and state regulations. Under this alternative, unlicensed cannabis businesses may continue to meet some demand for cannabis products locally, but the County would see no fiscal benefit while carrying the burden of related environmental impacts. There would also be no orderly development of cannabis activities, nor oversight of cannabis activities, and may not be feasible under local and state law. Further, demand of cannabis in the County likely would be met by supply from outside of the County, which could exacerbate impacts related to traffic generation and circulation, air quality, and greenhouse gases (GHGs), as well as public health and welfare, as the demands on local public services may increase (e.g., law enforcement and zoning enforcement services). Therefore, this potential alternative was discarded from further consideration.

Retail in Agriculture Zones Alternative – Under this alternative, all other components of the Project would remain as described in Chapter 2, Project Description; however, retail activities
would be allowed within agricultural zones Countywide. Similar to existing roadside agricultural produce stands or winery tasting rooms and in support of expanding the potential cannabis industry, this alternative would allow the sale of cannabis products from agriculturally zoned cultivation sites. Due to adherence to state regulations, this alternative may not be feasible and could result in increased traffic, noise, and quality of life concerns in agricultural and rural areas. This alternative would not meet Project Objective No. 9 which states, "Develop a regulatory program that protects the public health, safety, and welfare through effective enforcement controls (i.e., ensuring adequate law enforcement and fire protection services) for cannabis activities in compliance with state law, to protect neighborhood character and minimize potential negative effects on people, communities, and other components of the environment." Allowing cannabis retail activities in agriculture zones may increase public health and safety concerns associated with increased traffic, noise, and air quality impacts. As a result, this alternative was discarded from further consideration.

**Existing Registrants Alternative** – Under this alternative, in order to limit the extent of the cannabis industry within the County, the number of licenses issued by the County would be limited to the pool of applicants in the 2017 Cannabis Registry. This would place a cap on the total number of licenses administered within the County, in order to procedurally manage the growth of the cannabis industry within the County without restricting existing registrants who have indicated they would like to conduct cannabis activities. In effect, this Alternative would also preclude the option to obtain a Type 5 Unlimited Cultivation license in the future. The goal of this alternative would be to control the licensing, registration, and compliance to a proportion that more closely approximates existing grower demand in the County, and limit the amount of permitted development within the County that has the potential to adversely affect environmental resources. Under this alternative, the Existing Registrants Alternative would cap the total number of licenses allowed within the County at the quantity indicated within the 2017 Cannabis Registry (1,924 licenses total), distributed as follows: This alternative was discarded from further consideration in favor of Alternative 3, described below, which more closely aligns with the amount of indicated existing County operators and greatly limits the amount of potential expansion, instead of relying on the existing demand from growers.

- Type 1: 176
- Type 2: 217
- Type 3: 382
- Type 4: 270
- Type 5: none
- Type 6: 174
- Type 7: 126
- Type 8: 64
- Type 10: 124
- Type 11: 109
- Type 12: 202

It is possible that the Existing Registrants Alternative would reduce some impacts by controlling the total amount of licensed operations that would require more protective measures for environmental resources; however, this alternative would not meet Project objectives including Project Objective No. 1, related to development of a robust and economically viable legal cannabis industry, nor Project Objective No. 4, which encourages businesses to operate legally and secure a license to operate in full compliance with County and state regulations, and maximizes the proportion of licensed activities by minimization of unlicensed activities. Additionally, placing a
4.2 Alternatives Considered and Analyzed in this EIR

During the preparation of this EIR, the County considered several alternatives for the Project. The goal for developing possible alternative scenarios under CEQA is to identify other means to attain the Project objectives (Section 2.3.2) while lessening or avoiding potentially significant environmental impacts caused by adopting the Project. A reasonable range of alternatives with the potential to attain the basic objectives of the Project but avoid or substantially lessen significant impacts is analyzed below. Each alternative is discussed in relation to the objectives of the Project. Alternatives selected for analysis include:

- No Project Alternative
- Alternative 1 — Exclusion of Cannabis Activities from the AG-I Zone District Alternative
- Alternative 2 — Preclusion of Cannabis Activities from Williamson Act Land Alternative
- Alternative 3 — Reduced Registrants Alternative

A description of environmental impacts under each alternative is also provided below. Table 4-3 provides a summary of the comparative impacts of each alternative to the Project.

4.2.1 No Project Alternative

In accordance with CEQA, the EIR includes a No Project Alternative. As the Project is long-term regulation of cannabis activities, the No Project Alternative does not mean "no future growth or land uses," but rather that permitted development under existing adopted laws, plans, and policies would occur as if no changes were made. As stated in CEQA Guidelines Section 15126.6(e)(3)(A), “typically this is a situation where other projects initiated under the existing plan will continue while the new plan is developed. Thus, the projected impacts of the proposed plan or alternative plans would be compared to the impacts that would occur under the existing plan.” Therefore, the No Project Alternative addresses the potential environmental impacts that could result if the proposed Project is not adopted and the goals, standards, policies, and actions of the Project are not implemented.

Under the No Project Alternative, the Project would not be adopted and cannabis activities administered under a County licensing program would not occur. The County would continue to prohibit new cannabis activities, consistent with the Nonmedical Marijuana Interim Urgency Ordinance (Ordinance No. 4922), which was adopted by the County in April 2017 and imposed a temporary moratorium on any activities that would require a state license under the recently passed Adult Use of Marijuana Act (AUMA). This moratorium is set to expire in March 2019, in which cannabis would then be regulated under the existing Chapter 35 Article X of the County Code. This article prohibits cannabis cultivation businesses; however, it grants certain exceptions for some activities. Per Article X, medical marijuana cultivation locations already existing on January 19, 2016, if they are legal under California state law, would become legal nonconforming uses. Currently, Article X does not set forth a procedure by which staff or a decision-making authority may consider and formally recognize a legal nonconforming use. Therefore, if the existing Article X requirements become
effective after the expiration of the Nonmedical Marijuana Interim Urgency Ordinance in 2019, cannabis activity sites would be able to operate indefinitely, subject to future County decisions. In order to obtain a state license, the operator of the legal nonconforming use location could apply for a state license, and when the state inquires for local approval, the County may choose to provide a non-response. After 60 days, a non-response would become a “non-action” by the local jurisdiction, and the state could issue a state license. Therefore, some existing cannabis activity sites may remain under the No Project Alternative, while some may not be able to continue operating under the state regulations.

As described in Chapter 2, Project Description, the County Sheriff currently maintains an enforcement approach to cannabis that responds to calls and complaints for service, but does not actively seek out unlicensed cannabis operations and most cases have occurred in the backcountry involving grows in the national forest; this approach would continue under the No Project Alternative. State agencies, including the California Department of Fish and Wildlife (CDFW) and the Central Coast Regional Water Quality Control Board (RWQCB) would provide some limited additional enforcement services focused on resource protection in the County under pending state programs to support licensed cannabis activities statewide.

Under the No Project Alternative, the direct impacts associated with licensing of an expanded cannabis industry related to traffic, air quality, and agriculture would not necessarily occur. Thus, the No Project Alternative would have potential to avoid a number of direct significant and unavoidable and potentially significant impacts associated with the Project.

However, the No Project Alternative would not address unregulated and illegal cannabis activities, nor offer an avenue for licensing and permitting, and such activities would continue to operate and very likely expand given permissive state laws. Under the No Project Alternative, existing County law enforcement would continue on a primarily response-to-complaints and call-for-service basis. In addition, pending state-level regulations and enforcement programs may also be increased. However, over the more than three decades of local, state and federal law enforcement activities, such as the California Attorney General’s CAMP Program1 and the War on Drugs, cannabis cultivation and related activities have not been eradicated. Even with local, state, and federal participation in cannabis law enforcement, as well as pending state-level regulations and programs developed from the Medicinal and Adult-Use Cannabis Regulation and Safety Act (MAUCRSA), the illicit cultivation of cannabis in California and the County would likely continue to be a major business. Therefore, there would be no orderly development, nor oversight of cannabis activities within the County, with potential for expanded illegal activities. As a likely result of implementation of the No Project Alternative, it is reasonable to assume that many existing cannabis operations would continue operating as unlicensed operations.

Potential Impacts to Resource Areas

Under the No Project Alternative, regulations for commercial cannabis operations would not be adopted and licenses and permits would not be issued in the County, thereby preventing local cannabis business from attaining state-level licenses, with the exception of legal nonconforming uses subject to Chapter 35, Article X of the County Code. While many direct Project impacts would thus be avoided, as described in Chapter 2, Project Description, and Chapter 3, Environmental Impact Analysis,

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1 The CAMP program partners local, state, and federal agencies to eradicate the large scale illegal cannabis cultivations from public and private lands – California Attorney General 2017 - [https://oag.ca.gov/bi/camp](https://oag.ca.gov/bi/camp)
unregulated cannabis activities have potentially significant environmental impacts, particularly due to the lack of oversight and regulation and the need to conceal such activities. While it is not known to what extent such illegal activities would continue or expand, the long history of such activities in the County, strong interest in industry expansion, tremendous financial incentive, and lack of strong, credible, and effective enforcement indicate a potential for significant expansion of illegal activities. Such unregulated activities could create impacts related to grading, land clearing, habitat, water resources, odor, traffic, hazards, air pollution, the provision of public services, and utilities, such as energy and water. Under the No Project Alternative, unregulated cannabis activities would continue and likely expand with commensurate impacts to the environment, which would not be required to comply with the policies and development standards of the County's Comprehensive Plan or the Land Use and Development Code (LUDC), Montecito Land Use and Development Code (MLUDC), CZO, or any mitigation measures identified for the Project. Continued and increased impacts to environmental resources from unlicensed or illegal activities could include sensitive habitat degradation, cultural resource disturbances, erosion and sedimentation, and ground and surface water quality issues, given the dynamic nature of intensity, variability, and location of cannabis-related uses. Service demands, including water, wastewater, fire and police, solid waste, and utilities, would also occur. Continuing unlicensed cannabis activities would be expected to result in land use conflicts, and exacerbate land use compatibility and quality of life issues, as well as related code compliance enforcement issues. Impacts to specific resources are discussed further herein.

As existing cannabis operations continue to seek to operate as unlicensed operations, this would result in potential increases in illegal and unlicensed activities within the County with related and exacerbated adverse environmental impacts, such as illegal grading and land clearing, traffic, use of hazardous materials, and unchecked demand for utilities and public services (i.e., fire protection and law enforcement services). Given these factors, successful implementation of cannabis prohibition may not be realistic, would not meet Project objectives, and may create substantially more severe impacts than expansion of the industry under a well-regulated licensing program.

**Aesthetics and Visual Resources**

Under the No Project Alternative, no locally licensed cannabis activities would occur, and thus direct impacts to aesthetic and visual resources resulting from licensed cannabis activities such as (1) impacts to scenic vistas and scenic resources from clearing, grading, and construction of cannabis-related structures; (2) changes to existing visual character from conversion of land; and (3) creation of new sources of outdoor nighttime lighting, would be avoided.

However, ongoing or expanded unregulated cannabis operations would adversely affect aesthetic resources in new locations and in new ways Countywide. While unregulated cannabis activities would remain subject to existing County enforcement in response to complaints and calls for service, as well as state-level enforcement programs, which may reduce adverse effects over time, the effectiveness of such programs is unknown given past failures to suppress the industry. Although cannabis-related activities within permitted structures may occur, unlicensed activities may also continue and expand in non-permitted structures. However, unlicensed activities generally conceal operations to avoid detection and are located in more remote and/or heavily screened areas. These operations would be difficult to detect and would not significantly degrade scenic resources in publicly visible areas. Therefore, impacts to aesthetics and visual resources under the No Project Alternative would be similar but slightly less adverse than impacts described in Section 3.1, Aesthetics and Visual Resources. While some new structural development related to unlicensed cannabis operations could occur in public viewshe, visual impacts would be less than the proposed Project as there would be less
vegetation clearing, less grading in areas visible to the public, and reduced construction for new licensed structures. Therefore, due to the hidden nature of illegal activities, impacts would likely be relatively less than the proposed Project and would be less than significant.

Agricultural Resources

Under the No Project Alternative, no licensed cannabis activities would occur and potentially significant direct impacts to agricultural resources resulting from licensed cannabis activities, such as siting cannabis-related manufacturing and distribution uses on agriculturally zoned lands, and converting or covering agricultural soils with cannabis-related structures and foundations would not occur. Additionally, potential for expansion of greenhouse, processing, and manufacturing structures on prime soils would likely be avoided or minimized.

However, unregulated cannabis operations would adversely affect agricultural resources. Continued and accelerated unlicensed cannabis cultivation Countywide would potentially result in the incremental degradation or loss of some farmland or soils (e.g., loss of top soil through clearing activities, and related unregulated cannabis manufacturing activities upon prime soils), and adverse effects to lands identified as important farmland for the state or local level, and lands that are subject to a Williamson Act contract. The areas with the largest potential for continued adverse impacts would occur in more remote locations, isolated canyons, and more heavily vegetated foothill lands where activities can be most easily concealed. Such lands may include soils in valley bottoms or existing cropland on hillsides often located in or near the Los Padres National Forest (LPNF) and other public lands based on the preponderance of past known unregulated operations in these areas. While indirect impacts of illegal cannabis cultivation associated with agricultural resources under the No Project Alternative could occur, they would likely be substantially less than impacts described in Section 3.2, Agricultural Resources, and would be less than significant.

Air Quality and Greenhouse Gas Emissions

Under the No Project Alternative, direct impacts to air quality and those associated with GHG generation resulting from licensed cannabis activities, such as exposure of sensitive receptors to substantial pollutant concentrations, construction and operation generated emissions from cannabis activities, and cumulatively considerable increases in criteria pollutants would not occur.

No licensed cannabis activities would occur under the No Project Alternative, and unregulated cannabis operations would continue to emit air pollution and objectionable odors. Potential increased operation of unregulated sites would not comply with County standards and regulations. As such, air pollution and objectionable odor impacts would occur, including the use of diesel or gasoline generators, lack of use of commercial air scrubbers on indoor cultivation or manufacturing operations, and lack of setbacks such that the strong odor associated with cannabis, especially during the flowering phase, does not disturb nearby sensitive receptors. Unregulated manufacturing operations may involve activities that contribute to harmful air emissions from the release of combustion materials or other volatile gases. Other unregulated cultivation and manufacturing activities that would contribute to particulate emissions would likely occur, such as illegal clear-cutting and burning of trees and brush for cannabis-related development, in addition to burning agricultural waste rather than properly disposing in landfill or compost. Further, vehicle trips associated with cannabis activities would contribute significant amounts of nitrogen oxide (NOx) on an ongoing basis, similar to the proposed Project. As these unregulated operations would be ongoing,
operational impacts related to air emissions and objectionable odors would be greater than the proposed Project and *significant and unavoidable* under the No Project Alternative.

Construction-related impacts may be comparable to the proposed Project related to site clearing for cannabis operations, such as greenhouse and outdoor cultivation; however, such impacts would not involve required site improvements for roads and water infrastructure. Therefore, the No Project Alternative is expected to generate fewer construction-related emissions, including dust (particulate matter), diesel emissions, and volatile organic compounds. Construction-related impacts would be expected to be less severe than the proposed Project and *less than significant*.

Potential unlicensed cannabis activities would also contribute to increased GHG emissions from high energy demand, including both from public utilities energy providers and the use of portable diesel and gasoline generators on a stationary basis for extended periods of time as a site’s main energy source. Vehicles and water demand would further contribute to GHGs from unregulated cannabis activities. Therefore, impacts related to GHG emissions and produced by the construction and operation of future unregulated cannabis cultivation and/or manufacturing sites, and their associated infrastructure would be substantial and adverse, and similar to the impacts discussed in Section 3.3, *Air Quality and Greenhouse Gas Emissions*. While construction-related GHG emissions may be less than the proposed Project due to fewer site improvements, because the locations and nature of unregulated and unlicensed cannabis activities throughout the County would remain largely unknown and have no potential for mitigation, operational GHG impacts would be greater than the proposed Project and *significant and unavoidable*.

**Biological Resources**

Potentially significant direct impacts to biological resources resulting from licensed cannabis activities, such as expansion of cannabis-related development that would destroy, disturb, or otherwise interfere with special-status species and sensitive habitats; conversion of existing crops on agricultural land for cannabis cultivation use; and, potentially significant cumulative impacts to biological resources associated with waste discharge from cannabis activities would not occur.

Under the No Project Alternative, impacts of unregulated cannabis operations on biological resources would be more adverse compared to the proposed Project because unlicensed cannabis activities would not be subject to the County Code, including LUDC, MLUDC, or CZO standards, or proposed mitigation measures protecting sensitive biological resources. Existing and future cannabis activity operators may continue to clear-cut forests, remove or degrade sensitive habitats, expose such habitats to hazardous materials, adversely affect stream habitats, and engage in other non-permitted development activities that prevent the passage of wildlife or divert streams crucial to the life cycle of aquatic or riparian species. Therefore, because unregulated cannabis activities would continue under the No Project Alternative and not comply with existing regulations regarding biological resources, unlicensed cannabis activities would result in *significant and unavoidable* impacts that would be greater than the proposed Project.

**Cultural Resources**

Potentially significant impacts to cultural resources resulting from licensed cannabis activities, such as (1) physical demolition, destruction, relocation, or alteration of historical resources on previously unevaluated historic properties, and (2) disruption, alteration, destruction, or adverse effects on significant archaeological resources, tribal cultural resources, human remains, or paleontological resources, would not occur.
Under the No Project Alternative, impacts of unregulated cannabis operations on cultural resources would be greater compared to the proposed Project. The location of unregulated cannabis activities under this alternative would be variable and would occur throughout the County, including areas with known or unknown historical resources, archaeological resources, tribal cultural resources, human remains, or paleontological resources. Cannabis activities could also potentially involve reuse of historic structures for cannabis operations. Unregulated cannabis activities would not comply with state and County guidelines and regulations pertaining to cultural resources, and would not involve mitigation measures identified for the proposed Project to protect potentially significant cultural resources. Therefore, unregulated cannabis activities could have a potentially adverse effect on archaeological resources, tribal cultural resources, human remains, and paleontological resources from unpermitted ground disturbance, site development, and reuse of existing structures. Because no cannabis operations would be regulated by adopted standards, potential adverse impacts would be greater than the proposed Project and would be considered significant and unavoidable.

Geology and Soils

Direct impacts related to geology and soils resulting from licensed cannabis activities, such as potential adverse effects from clearing and grading for cannabis activities that would result in exposure to unstable earth conditions, particularly erosion, landslides, and other geologic hazards, would not occur.

Given that much would be unknown regarding unregulated sites and associated cannabis activities under the No Project Alternative, it is difficult to determine where cannabis activities would occur. However, it is likely that unregulated cannabis activity sites would be located in remote areas screened from public view, such as in steep-sloped mountainous areas and densely forested areas. Cannabis operations would continue to operate without adherence to County policies, as well as LUDC, MLUDC, or CZO regulations pertaining to siting, grading, and erosion control. Therefore, unlicensed cannabis activities would likely contribute to increases in geological hazards associated with extensive grading or clear cutting, which would result in soil erosion, sedimentation, alterations of site topography, and exacerbated erosion. Potential adverse impacts to soils and geologic resources would be greater than the proposed Project due to increased amounts of unregulated activities and lack of compliance with LUDC, MLUDC, or CZO regulations. Potential unregulated site grading and soil disturbance would have adverse effects on erosion and slope stability. Therefore, impacts would be greater than the proposed Project and would be significant and unavoidable.

Hazards and Hazardous Materials

Direct impacts to hazards and hazardous materials resulting from licensed cannabis activities, such as potential impacts resulting from prior use, storage, or discharge of hazardous materials on lands subject to future cannabis activities would not occur.

No licensed cannabis activities would occur under the No Project Alternative, and impacts to hazards and hazardous materials would result from ongoing unregulated cannabis operations Countywide. Unlicensed cannabis activity sites have the potential to store or discharge hazardous materials, including fuels, oils, pesticides, and fertilizers. Unlicensed cannabis activity sites also have a high potential to involve operations that increase fire hazards, including use of machinery, faulty electric power, and increased human presence onsite in remote and heavily vegetated areas. As compared to the Project, unregulated cannabis activity sites have a higher likelihood to be located on contaminated sites, such as former oil and gas pipelines or above underground storage tanks that may release...
contamination during soil disturbance or excavation. Additionally, some types of cannabis product manufacturing involve storage and use of flammable and explosive materials (e.g., compressed liquefied petroleum gases) that would continue to occur unregulated under the No Project Alternative. Further, risky butane honey oil (BHO) extraction labs within the rural mountainous regions (e.g., rural Santa Ynez Valley and LPNF) where operations are less prone to be discovered may be concentrated in areas that are not subject to adequate emergency response services or evacuation plans. These sites pose increased risk to workers and residents in the event of wildfires. Unregulated facilities operating near sensitive receptors would also have the potential to expose significant populations to hazards or hazardous materials. Given the uncertainty of the locations and nature of unlicensed cannabis activities, as well as the inability to effectively ensure compliance with existing safety-related policies and regulations, adverse impacts to hazards and hazardous materials would be greater than the proposed Project and would be significant and unavoidable.

**Hydrology and Water Resources**

Direct impacts to surface and groundwater quality, surface water runoff, and groundwater levels would be avoided.

However, indirect impacts under the No Project Alternative related to unregulated cannabis operations in remote areas of the County could occur related to inappropriate siting, grading, use of pesticides, runoff control, rights to water, and erosion control that would adversely affect water resources, including streams and groundwater. Unlicensed sites may rely on existing and new wells that could draw groundwater at rates such that water resources would be adversely affected. Unlicensed sites may also rely on illegal stream diversions due to the lower expense of operating a portable pump compared to drilling a new well, or be sited in areas of inundation or mudflows. Further, unlicensed cannabis-related activities may not adhere to existing state regulations, County policies, the County Code, including LUDC, MLUDC, or CZO regulations intended to protect water quality, nor would these sites go through a licensing process to ensure water quality is considered in site development. Hydrologic impacts related to site disturbance and runoff from unregulated operations would remain. As a result, potential adverse impacts to hydrology and water resources within the County would be greater than the proposed Project and impacts would be significant and unavoidable.

**Land Use and Planning**

Direct impacts from the potential for licensing of cannabis activities on publicly owned lands (e.g., Gaviota, El Capitan, and Refugio State Parks) would be avoided.

However, impacts related to land use and planning policy consistency under the No Project Alternative would indirectly result from land use conflicts related to unregulated cannabis activities. With continued and future unlicensed cannabis activities, impacts to surrounding land uses, neighborhood character, and quality of life issues would likely expand under this alternative. Such impacts may involve but are not limited to non-residential activities within a residentially zoned neighborhood; high intensity commercial and manufacturing uses in low density or rural areas; nighttime activities generating light, noise, and traffic impacts in an area with sensitive populations; and intrusion of cannabis-related activities in recreational or educational areas heavily populated by children. Such neighborhood compatibility issues would also conflict with the County Code, including LUDC, MLUDC, and CZO standards. Without a cannabis permitting and licensing program, as proposed within the proposed Project, standards to ensure land use compatibility would not be implemented.
and therefore, impacts would be greater than the proposed Project and would be significant and unavoidable.

**Noise**

Direct impacts associated with site construction and operation would not occur under this alternative. However, ongoing and expanded unregulated cannabis activities would occur unlicensed throughout the County. Impacts would be less than the Project, as those activity sites which conduct operations at noise levels that exceed County thresholds on sensitive receptors would likely be discovered and shut down. Nevertheless, the unregulated operation of activity sites would not be required to comply with County thresholds for protections for sensitive noise receptors or ensuring that noise levels from generated traffic or similar operations are not exceeded. Therefore, though noise impacts from construction and operation would be less than the Project, impacts would remain significant and unavoidable.

**Public Services**

Direct impacts from the increased demand for public services, such as police, fire, and emergency services would be avoided. However, ongoing and expanded unregulated cannabis activities would occur unlicensed throughout the County and particularly in inaccessible rural areas, where the availability of public services may be limited. The potential impacts on public services would depend on the location and uses involved in cannabis operations, as well as the availability of public services in the area. Unlicensed cannabis development would not be subject to LUDC, MLUDC, or CZO regulations or County policies addressing emergency services. Enforcement and management of illegal cannabis operations would place increased demands upon police- and fire-related services. For example, since the Sheriff responds to cannabis cases on a complaints-driven basis, it is expected that calls for service would increase commensurate with increased unregulated activities which many adversely affect neighborhoods throughout the County. Unregulated cannabis manufacturing, including volatile extraction processes, could continue or expand in remote areas unsuitable for manufacturing, such as in rural areas of the County subject to increased threat from wildfire for fire hazards, increasing fire, police, and emergency response times with unknown adequacy of fire suppression services. These activities could also increase fire and hazards risks for both residents and emergency response personnel. Such increases in demand associated with operation of unlicensed cannabis activities throughout the County may require the physical construction of new or expanded governmental facilities necessary to maintain standards for adequate service ratios, response times, or other performance objectives, the construction of which may result in adverse impacts to the environment. The population associated with unregulated cannabis would also demand other services, such as schools, libraries, and recreation, though these demands are expected to be similar to the proposed Project. Given unlicensed cannabis cultivation would not be in compliance with LUDC, MLUDC, or CZO regulations that address public service adequacy including acceptable emergency access, impacts related to public services under this alternative would be greater than the proposed Project and significant and unavoidable.

**Transportation and Traffic**

Direct impacts from the generation of new employee and commercial vehicle trips resulting from licensed cannabis activities such as (1) impacts related to traffic and daily vehicle miles travelled
(VMT); (2) inconsistency with plans and policies regarding public transit, bicycle, and pedestrian facilities; and (3) generation or exacerbation of circulation safety hazards, would be avoided.

However, ongoing or expanded unregulated and unlicensed cannabis operations would adversely affect the circulation network throughout the County. For instance, to avoid enforcement and incrimination, implementation of the No Project Alternative may increase the number of cannabis sites which may operate in areas with inadequate emergency access or in areas with unsafe roadway features or potential traffic hazards compared to the proposed Project. Operations that generate traffic from employees and operations that use private undeveloped roads or access rural roads within the County may introduce or exacerbate traffic safety hazards and conflict with users of the same roadways, without standards to ensure adequate access for all users of these roadways. Trips generated from unlicensed cannabis operations would also have the potential to exacerbate traffic congestion on local roads and highways already operating at or near unacceptable levels. Therefore, unlicensed operations have the potential to exacerbate impacts related to transportation and traffic more than the proposed Project, due to the lack of ability to identify and mitigate or address potential adverse effects, and impacts would be similar to the proposed Project and would be significant and unavoidable.

Utilities and Energy Conservation

Direct impacts to utilities and energy conservation resulting from licensed cannabis activities such as impacts related to (1) demand for water supplies and services, wastewater treatment, solid waste disposal services, and energy supplies, and (2) inconsistency with existing energy standards and conservation policies from the County Comprehensive Plan and Energy and Climate Action Plan, would be avoided.

However, the No Project Alternative likely would result in a greater number of unlicensed cannabis activities than under the proposed Project, which would result in greater adverse indirect impacts to water, wastewater, and solid waste services or infrastructure. While the cannabis industry may not reach a level that is anticipated under the proposed Project, and would likely result in reduced overall demand for utility services and supplies, illegal operations would occur without County Code or County policy compliance, and could include unregulated groundwater or surface water diversion, improper disposal and treatment/non-treatment of wastewater generated onsite, or the improper storage, handling, and disposal of municipal solid waste, as well as cannabis plant waste products. Unregulated cannabis operations also have the increased potential to result in the use and consumption of high levels of nonrenewable energy resources due to the lack of enforcement with regulations which would reduce energy demands of the proposed Project, particularly related to electrical supplies. Therefore, the No Project Alternative would result in greater impacts to utilities and energy conservation than the proposed Project, and impacts are considered significant and unavoidable.

Population, Employment, and Housing

Under the No Project Alternative, the County would not develop a licensing program that would allow for the expansion of a previously illegal business sector and the potential for the generation of a substantial new number of jobs, demand for housing, and associated increases in Countywide population. Thus, direct impacts to population, employment, and housing would be reduced.

However, the No Project Alternative would result in ongoing or expanded unregulated cannabis operations which may result in the generation of new employment opportunities. Increases in
employment under the No Project Alternative would likely be met by existing County workforce populations, and indirect increases in demand for housing and subsequent increases in countywide population is not anticipated to increase at a rate that would exceed local and regional growth forecasts. Because such operations would be unregulated, increases in cannabis-related jobs and demand for housing could not accurately be identified at the local or regional level, and such operations would not be considered under existing growth projections. Therefore, impacts would likely be less than the proposed Project and would be less than significant.

Conclusion and Relationship to Project Objectives

This alternative would not reduce significant direct impacts of the proposed Project to a less than significant level, with the exception of aesthetic/visual and agricultural resource impacts. Essentially, this alternative would perpetuate unlicensed cannabis activities which would have impacts that are similar to—but would be greater than—the impacts of the proposed Project, since all existing and future commercial cannabis activities would occur without the benefit of the licenses. As such, adoption of the No Project Alternative could result in greater impacts related to all other resources described above and would not reduce construction-related air quality and GHG emission impacts. Similarly, significant and unavoidable impacts associated with unlicensed cannabis activities under the proposed Project would be similar to this alternative for nearly all resources.

Additionally, while this alternative would achieve a select few of the Project objectives, Alternative 1 would directly conflict with or not achieve the majority of the Project objectives. (See Chapter 2, Project Description.) This alternative would not develop any program to encourage cannabis cultivators and cannabis product manufacturers to operate legally, would not ensure compatibility of commercial cannabis activities with surrounding land uses, would not minimize adverse effects on natural resources or wildlife, and would not facilitate participation within the County or in accordance with recently adopted state regulations.

4.2.2 Alternative 1 – Exclusion of Cannabis Activities from the AG-I Zone District Alternative

Under the Exclusion of Cannabis Activities from the AG-I Zone District Alternative (Alternative 1), cannabis-related activities would not be allowed within the AG-I zone districts throughout the County and cannabis licensing regulations would be modified to reduce the areas of eligibility in the County to reflect this change, particularly within the Carpinteria Valley and the Santa Ynez Valley (Figure 4-1). The intent of this alternative would be to reduce perceived potential environmental and land use compatibility impact concerns associated with the Project that were identified during the NOP scoping and DEIR public comment processes as well as from general public interest, specifically those related to odor and land use compatibility. Under this Alternative, cannabis cultivation, manufacturing, and distribution activities would be prohibited within the AG-I zone district Countywide. Under this Alternative, similar to the Project, licensed cannabis activities would continue to be allowed in rural agricultural areas (AG-II zone district only), commercial, and industrial zone districts.
Alternative 1 – Exclusion of Cannabis Activities from the AG-I Zone District Alternative
Under this Alternative, exclusion of cannabis activities from the AG-I zone district would be implemented through development standards and zoning regulations to reduce the area of eligibility compared to the proposed Project (Figure 4-1). Under this alternative, opportunities for the cannabis industry would be substantially reduced, as areas of major current and proposed cultivation and other cannabis activities within AG-I zoned land, such as within the Carpinteria Valley, Santa Ynez Valley, and Tepusquet Canyon, would be excluded from the cannabis licensing program (Table 4-1). For instance, within the Carpinteria Valley, there is a total of approximately 400 acres of greenhouse-type structures, including greenhouses, hoop structures, and shade structures on AG-I zoned parcels.

Under the Alternative 1, approximately 41,368 acres of AG-I zoned land would be removed from eligibility compared to the Project, primarily within the Carpinteria, Santa Ynez, and Tepusquet areas of the County. Out of the 671,023 acres eligible under the proposed Project for License Types 1 through 5, related to cultivation, this would result in an approximately 6 percent reduction of eligible land. This Alternative would also reduce the amount of land available for License Types 6, 7, 11, and 12 related to manufacturing, distribution, and microbusinesses by approximately 6 percent. While this alternative restricts all cannabis activities on all AG-I zoned lands, licensees may still locate anywhere within the reduced areas of eligibility in AG-II, commercial-, and industrial-zoned lands.

As described in Chapter 2, Project Description, existing cannabis cultivation in Santa Barbara County includes 134 unique, known cannabis activity sites, as identified in the 2017 Cannabis Registry data. Of the data collected, 216 registry respondents indicated that they are currently cultivating on an existing 396 acres of cannabis canopy. Under this Alternative, registry data indicates that only 74 of 134 existing program registrants (55 percent) would be eligible for licensing (Table 4-1). For example, the Carpinteria Valley is entirely within the AG-I zone district and currently supports at least 37 acres, which is 20 percent of all cannabis cultivation from known addresses (186 acres) and is proposed for 61 additional acres, or 9 percent of all potential future demand (730 acres). The Santa Ynez Region currently supports 12 cultivation sites within the AG-I zone district, which is 40 percent of known cannabis cultivation sites in that region. While the acreages of AG-I land excluded is not large (only 41,368 acres) and is only 6 percent of the 671,023 acres of Countywide acreage eligible for cultivation, manufacturing, and distribution, this Alternative would exclude the County’s most highly developed and sophisticated agricultural areas, namely the Carpinteria Valley, from the program.

<table>
<thead>
<tr>
<th>Table 4-1. Comparison of Registrant-Provided Cultivation Sites Eligibility under the Proposed Project and Alternative 1</th>
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<tr>
<td>Total Registrant-Provided Sites</td>
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<tr>
<td>Potentially Eligible Sites after Regulatory Constraints are Considered</td>
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<tr>
<td>Potentially Ineligible Sites</td>
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In summary, Alternative 1 would reduce the total amount of eligible area and sites as compared to the proposed Project, and would require substantial relocation or abandonment of existing cannabis operations. This alternative would also reduce the concentration of the current cannabis businesses found in the County in areas like Carpinteria and the Santa Ynez Valley to more dispersed and scattered locations throughout the AG-II-zoned lands, potentially in areas such as the Santa Maria and Santa Ynez valleys, and the Cuyama region. Existing registrants would need to find locations within the reduced area of eligibility as depicted in Figure 4.1. As a result, this alternative may result in a
The decrease in the total number of cannabis operators in the County, and also limit the opportunity for businesses to secure a license in the County.

Under Alternative 1, cannabis activity sites currently operating within the AG-I zone district would potentially become legal nonconforming uses upon adoption. An unknown number of these sites would be able to remain at their current location, while others may need to relocate. Medical cannabis cultivation sites that are considered to be legal nonconforming uses pursuant to Article X zoning regulations and which would remain within the AG-I zone district, could not be expanded or substantially changed with regard to use, without risk of becoming an illegal operation. For example, under this Alternative, if all sites do not qualify as legal nonconforming sites, approximately 60 existing cannabis cultivation sites that are located within in the AG-I zoning district would need to be relocated to eligible areas, be abandoned, or convert to other allowed agricultural activities or uses.

Additionally, although restrictions could drive some growers into conducting illegal cultivation operations, in areas such as LPNF, places with dense vegetation, or are otherwise readily concealed, the existing industry in the County is primarily that of major agricultural operations (including use of hoop structures and greenhouses). These types of operations are unlikely to relocate to illegal areas that are screened or within more rural, removed areas. Instead, it is anticipated that these operations which cannot obtain licensing are more likely to relocate outside of the County to areas with different or reduced regulatory oversight, such as the counties of Mendocino, Calaveras, Monterey, or Humboldt.

Nevertheless, precluding cannabis activities from AG-I areas that have well developed and sophisticated existing agricultural infrastructure such as state of the art greenhouse, packing, and shipping facilities may increase new development in less developed rural areas of the County on AG-II lands to support permitted cultivation, for those operations which continue within the County. While the reduction of current and future cultivation sites under this Alternative may result in fewer environmental impacts in some areas of the County due to reduced land use compatibility and odor concerns, other environmental impacts such as loss of habitat, visual intrusion into sensitive viewshed, and water quality impacts may increase in these areas. Cultivation uses may also result in grazing land conversion to cultivation construction of processing, packaging, distribution, and manufacturing uses with associated impacts (e.g., increased water demand).

As compared to the proposed Project, the approximate total area of eligibility for cannabis product retail sales and testing under this alternative would remain the same, although there may be a greater concentration of certain cannabis cultivation, manufacturing, and distribution sites within commercially- and industrially-zoned properties for those operators who remain within the County.

Indirect impacts of illegal cultivation and other activities may result because many potential licensees may abandon the Project if the proposed site of licensing is not eligible. Such operations would not be subject to licensing criteria requirements, development standards, and regulations associated with licensed facilities and could result in continued or increased adverse effects upon the environment, such as clearing of woodland and sensitive habitats, unregulated volatile manufacturing, water diversions, non-regulated waste water effluent, sedimentation and erosion concerns, greater fire safety and security risks, degradation of neighborhood quality of life, as further described herein. By not accommodating a substantial proportion of existing cannabis activities and proposed expansion area as represented in the License Registration data, this Alternative may result in greater environmental impacts than the proposed Project as further analyzed below.
Precluding the AG-I agricultural areas with substantial existing cannabis activity and well developed agricultural infrastructure could increase pressure for cannabis development on more undeveloped areas of the County, primarily within AG-II areas in order to support projected demand for permitted cultivation and other activities.

Potential Impacts to Resource Areas

Prohibiting use of more than at least 50 acres of existing greenhouses and other existing infrastructure (e.g., packing houses) in the Carpinteria Valley and other AG-I areas, which are currently utilized or proposed for cannabis cultivation, processing, packing and potentially manufacturing could cause substantial growth inducement in the County’s rural AG-II agricultural areas. Under Alternative 1, cannabis activity sites currently operating within the AG-I zone district would potentially become legal nonconforming uses upon adoption. An unknown number of these sites would be able to remain at their current location, while others may need to relocate. Those sites which remain within the AG-I zone district would not be able to expand or substantially change use, or risk becoming an illegal operation. For future cannabis activities development, construction of new greenhouses, hoop houses, and packing/processing facilities in the County’s scenic rural areas potentially visible from State Scenic Highways 101 through Gaviota, and 154 through Santa Ynez as well as Highway 135 through Los Alamos, Highway 246 through the Santa Rita Hills and other scenic roads, could be highly visible. Displaced growers from AG-I areas who decide to remain within the County and are financially able could pursue construction of new concrete floor greenhouses, and packing/processing and manufacturing facilities in the County’s scenic rural areas creating impacts to aesthetic and visual resources. Changes in specific impacts are discussed below.

Aesthetics and Visual Resources

Under Alternative 1, impacts to aesthetics and visual resources could be similar to the Project.

Impacts AV-1 and AV-2: Under Alternative 1, cultivation, manufacturing, and distribution activities would be prohibited in all areas of the County zoned AG-I, where hundreds of thousands of square feet of greenhouse and other structures are currently used or planned for cannabis activities. Demand for space for cannabis cultivation, processing, packaging, and manufacturing could stimulate construction of new greenhouses, hoop houses and other structures that could result in grading, vegetation clearing, and construction on publicly visible slopes that could have adverse impacts on scenic resources. Given that a portion of the existing registrants may seek to relocate ineligible cannabis sites on AG-I zoned lands to eligible cannabis sites on AG-II zoned lands or commercially-zoned lands, a higher density of both indoor and greenhouse cannabis development may occur within eligible zones under Alternative 1 (i.e. AG-II zone). In addition, under this Alternative, more licensed cultivation would occur in rural areas within AG-II zoned lands given the exclusion of cannabis activities on AG-I zoned lands. Given the potential for additional greenhouse and structural development to alter the visual character of scenic rural areas of the County where AG-II zoned lands are located, impacts would be considered potentially significant. However, similar to the proposed Project, proposed development criteria and restrictions would assist in the protection of visual resources and scenic views. The regulations require proposed sites in scenic areas to be evaluated against the context of their unique environment with criteria for structure height, setbacks, and design to protect scenic resources in the surrounding area. Cultivation, manufacturing, and distribution activities under Alternative 1 would also be subject to a case-by-case review by the County. Additionally, Alternative 1 would be subject to the goals and policies of the County’s Comprehensive Plan and the provisions of the LUDC, MLUDC, and CZO, include siting requirements.
that address preservation of scenic views to ensure development is compatible with existing aesthetic and visual resources. Taken together, these standards and review processes would ensure compatibility with the surrounding landscape and reduce the visual impacts associated with cannabis activities so that the Alternative 1 would not substantially degrade the visual character in the County's rural areas.

Under Alternative 1, impacts to aesthetic resources in rural areas would be substantially more severe than under the proposed Project, because cannabis related development would be precluded from AG-I zoned lands and would therefore likely occur in rural areas outside of AG-I zoned lands. The proposed Project would involve initially licensing more eligible sites than Alternative 1 due to the exclusion of 60 sites in the AG-I zoned lands. Because Alternative 1 would potentially induce substantially more cannabis industry related growth and development in the rural areas with increased potential for visual impacts on AG-II zoned lands. Specifically, these increased visual impacts could occur in the Cuyama region, in the Gaviota and Goleta and Carpinteria Foothill areas of the South Coast region, the Lompoc Valley, and the rural areas of the Santa Ynez and Santa Maria regions. Alternative 1 would result in greater visual impacts in these rural areas due to grading, land clearing, and other site improvements, sometimes in areas where there is little to no existing agricultural development, such as along the perimeters of the LPNF. With implementation of MM AV-1, Screening Requirements, impacts would be reduced. The combination of the project regulations, County’s development criteria, implementation of mitigation measures and case-by-case review would ensure impacts are less than significant with mitigation.

Agricultural Resources

Under Alternative 1, impacts to agricultural resources could be similar to the Project.

**Impacts AG-1:** Impacts under Alternative 1 from cannabis manufacturing and distribution would be somewhat greater than the Project. Under Alternative 1, manufacturing and distribution uses could be concentrated on primarily AG-II zoned lands with some potential to conflict with agricultural production. Because cannabis has been considered an agricultural product, as discussed in Section 2.2.3, Agricultural Context of Cannabis, and Section 3.2, Agricultural Resources, conversion of outdoor cultivation to indoor or greenhouse cultivation would not conflict with existing agricultural zoning or Williamson Act contracts. Under Alternative 1, incrementally greater land use compatibility impacts with agriculturally zoned lands could occur with the introduction of a range of cannabis related structures for manufacturing, packaging, and processing with associated traffic, construction, and other activities that may have potential to disrupt proximate agricultural activities. Implementation of **MM AG-1, Cultivation Prerequisite to Ancillary Use Licenses**, would ensure manufacturing and distributing activities are subsidiary uses to support the agricultural use of agriculturally-designated County lands. As a result, Alternative 1 would result in a less than significant impact with mitigation.

**Impacts AG-2:** Under Alternative 1, expansion of cannabis related concrete floor greenhouse, packing sheds, and processing and manufacturing structures could lead to increased conversion or over-covering of prime agricultural soils or could impair agricultural land productivity. For instance, under Alternative 1, if operators decide to remain within the County, projected growth under the Project could be combined with more than 37 acres of existing canopy and associated greenhouse structures from growers displaced from Carpinteria Valley, in addition to 67 additional acres of potential demand for conversion, creating a potential need for nearly 100 acres of corresponding agricultural structure space in rural areas, though may be reduced due to sometimes prohibitive costs associated with agricultural infrastructure development. Although the precise location of such development is
not known, the potential exists for over-covering prime soils with concrete floors, roads, and parking areas, which would result in permanent or long term loss of such soils. Therefore, while potential demand for such land would comprise only 0.2 percent of eligible land area designated by the County for agricultural uses, impacts from loss of prime soils would remain potentially significant and would be more severe than under the Project. Although conversion of Prime Farmland, Farmland of Statewide Importance, or Unique Farmland would be related to agricultural use or support facilities, these soils would still be over-covered, subject to damage and long term or permanent loss to production. Mitigation measures to minimize impacts would include development standards to require avoidance of prime soils and productive agricultural land to the maximum extent feasible. Individual projects would be subject to case-by-case environmental review in order to minimize impacts to agricultural resources. However, because concrete floor greenhouses, packing sheds, processing outbuildings, and road and parking areas are all allowable for agricultural uses or to support such uses, it would not be possible to completely avoid loss of prime soils, and implementation of **MM AG-2, New Structure Avoidance of Prime Soils**, would remain necessary to reduce impacts. Therefore, conversion of agricultural lands from future cannabis activity development under Alternative I would be incrementally more severe than the Project and **significant and unavoidable**.

**Air Quality and Greenhouse Gas Emissions**

Under Alternative 1, construction impacts would be greater than the Project, while operational impacts to air quality and associated impacts to greenhouse gas emissions could be less adverse than under the Project.

*Impact AQ-1:* Impacts would be similar to those discussed in Section 3.3, *Air Quality and Greenhouse Gas Emissions*, however, incrementally increased from the proposed Project. Limiting all cultivation, manufacturing, and distribution activities from the AG-I zoning district under Alternative 1 would lessen pollutant concentrations and objectionable odors on nearby sensitive receptors and residences. However, promoting cannabis cultivation and manufacturing facilities to rural areas, where the AG-II zoned lands are located primarily within the Cuyama region, the coastal areas of Lompoc Valley, and the rural areas of the Santa Ynez and Santa Maria regions of the County would increase the cumulative effect of these pollutants and odors within these regions. Additionally, existing cannabis cultivation development in AG-I lands would be required to shut down or relocate, which would cause increased construction emissions as compared to the Project. Taken together, impacts would remain **significant and unavoidable** given there is not feasible mitigation to lessen the impact associated with the inconsistencies between the proposed Project and Alternative 1 and the County’s Clean Air Plan.

*Impacts AQ-2:* Air quality impacts of cannabis cultivation, manufacturing, and distribution under Alternative 1 would be similar to construction generated and operation generated emissions from cannabis activities under the Project. Similar to the Project, short-term construction emissions, which includes PM$_{10}$ and NO$_x$ pollutants associated with cannabis activities are not expected to violate an air quality standard and would be **less than significant**.

*Impact AQ-3:* Long-term operation emissions would occur due to the increased vehicle mobile emissions generated by vehicle trips from employees and customers of new or expanded cannabis activities sites, as well as from the transportation of cannabis products to and from these sites. Programmatically, the long-term operation emissions are considered **potentially significant** for the proposed Project, and impacts under Alternative 1 would be slightly greater. Because Alternative 1
would restrict cannabis activities on AG-I zoned lands, which are typically closer to urban areas, this alternative would result in slightly increased vehicle mobile emissions generated from increased and longer vehicle trips to cultivation sites on AG-II zoned lands, often located in rural areas. Similar to the Project, despite implementation of MM AQ-3, Cannabis Site Transportation Demand Management, which would reduce air quality emissions from vehicle trips, impacts under Alternative 1 resulting from air pollutant emissions generated by mobile sources would remain significant and unavoidable.

Impact AQ-4: Impacts from cannabis activities under Alternative 1 could be potentially inconsistent with the Energy and Climate Action Plan. While the proposed Project and Alternative 1 both promote an orderly, efficient, and defined licensing and permit process for cannabis activities, this would nevertheless result in growth in the agricultural and manufacturing industry beyond what is forecasted in the CAP. As such, implementation of the Alternative 1 would be inconsistent with the CAP, and in turn, also with the ECAP. Therefore, Alternative 1 would result in potentially significant impacts related to GHG emissions and climate change that would be similar to the proposed Project. Similar to the proposed Project, because there is no feasible mitigation, this impact would be significant and unavoidable.

Impact AQ-5: Impacts from odors and site emissions would occur under Alternative 1, but they would be reduced compared to the proposed Project. Because all AG-I-zoned lands would no longer be eligible for cannabis cultivation, manufacturing, and distribution, this would reduce potential odors and site emissions that would originate from cannabis activities sited on AG-I zoned lands, which are typically located closer to sensitive receptors, a higher concentration of people, and residential neighborhoods. Cultivation, manufacturing, and distribution operations located on agricultural parcels in the rural areas of the County may be several miles to hundreds of miles from sensitive receptors. As a result, Alternative 1 would minimize odor and site emission impacts. Nevertheless, some cultivation sites may be located within proximity to a sensitive receptor, and similar to the Project, implementation of MM AQ-5, Odor Abatement Plan (OAP), would ensure that impacts under Alternative 1 resulting from potential nuisance odors would be reduced. However, because nuisance odors may not be substantially reduced due to the mitigation, impacts would remain significant and unavoidable.

**Biological Resources**

Under Alternative 1, impacts to biological resources could be similar to the Project.

**Impacts BIO-1 and BIO-2:** Under Alternative 1, licensed cannabis activities would occur on non-AG-I zoned areas of the County, primarily AG-II zoned lands, and some commercial and industrial zoned lands. While concentrating cannabis activities on AG-II zoned lands would limit the extent of the impacts to unique, rare, threatened, and endangered species and sensitive habitats, Alternative 1 may increase the severity of impacts on agricultural lands in rural areas of the County. While some eligible agricultural areas may have lower habitat values, particularly in areas with existing urban development, other areas that border mountainous and coastal areas near federal and state lands, may have higher habitat values due to less habitat fragmentation. As a result, because the range of eligible Project area would likely be pushed to rural areas of the County under Alternative 1, associated biological impacts would likely increase in comparison to the proposed Project. However, the implementation of MM BIO-1a, Tree Protection Plan, MM BIO-1b, Habitat Protection Plan, and MM HWR-1, Cannabis Waste Discharge Requirements Draft General Order, would ensure that impacts would be less than significant with mitigation.
Impact BIO-3: Impacts under Alternative 1 associated with the movement of any native resident or migratory species would be more than the proposed Project, because of the increased amount of cannabis activities that would occur on or adjacent to wildlife areas located near rural AG-II zoned lands. However, compliance with County conservation policies and development standards would be required by each licensee applicant, which would reduce potential biological impacts. Additionally, the implementation of MM BIO-3, Wildlife Fencing, would ensure biological impacts remain less than significant with mitigation.

Impact BIO-4: Impacts under Alternative 1 would remain similar to the proposed Project related to consistency with adopted local plans, policies, or ordinances oriented towards the protection and conservation of biological resources. Because Alternative 1 would require projects to demonstrate consistency with applicable policies and development standards, and projects would be reviewed on a case-by-case basis, impacts associated with the protection and conservation of biological resources would be considered less than significant.

Cultural Resources

Under Alternative 1, impacts to cultural resources would be incrementally less severe in some instances, but incrementally more severe in others when compared to the Project.

Impacts CR-1 and CR-2: Alternative 1 would involve licensing of a smaller potential impact area than the proposed Project, which would result in more focused areas of cannabis activities. However, because cannabis-related development would not occur on AG-I zoned lands, it is likely that such development would occur in rural areas, which would increase the potential for disturbance of undiscovered historical, archaeological, or paleontological resources. Land clearing and modifications to existing structures near properties that are known to include significant resources would have an adverse effect on the physical context of the historic structures and may potentially diminish its historic value. Site preparation and grading activities for new developments under Alternative 1 could inadvertently uncover significant cultural resources which would result in more adverse impacts when compared to the Project. However, similar to the Project, proposed cannabis activities would be subject to LUDC, MLUDC, County Comprehensive Plan, and County Coastal Land Use Plan policies and regulations, which require avoidance of impacts to historic resources. Compliance with existing regulations, policies, and guidelines would reduce impacts of Alternative 1 to cultural resources. Additionally, implementation of MM CR-1 (CSMM CulRes-10), Preservation, would reduce impacts to structures that may be eligible historic resources. As a result, impacts to historic resources, archaeological resources, tribal cultural resources, human remains, and paleontological resources under Alternative 1 would balance to be similar to the Project, and would remain less than significant with mitigation.

Geology and Soils

Under Alternative 1, impacts related to geology and soils could be similar to the Project.

Impacts GEO-1 and GEO-2: Impacts of cannabis cultivation under Alternative 1 involving exposure to landslides, erosion, earthquakes, liquefaction, expansive soils, ground failure, or other geologic hazards would be greater than the proposed Project due to the expansion of cannabis activities into rural areas of the County. Manufacturing and distribution facilities would be anticipated to be spread across AG-II lands in the rural areas of the County. While some of these rural areas may be flatter in the agricultural areas near Cuyama Valley and have fewer geological hazards as compared to other areas, while other areas may contain greater geological hazard risks due to their proximity to...
mountainous terrain with steeper slopes and soil erosion potential. Compliance with the Santa Barbara County Comprehensive Plan Seismic Safety and Safety Element, Grading Ordinance, County Building Code, the LUDC, MLUDC, Coastal Zoning Ordinance, and application of the CBC standards would address potential impacts to structures related to seismic events and soil-related hazards. Compliance with these existing policies and regulations would reduce impacts under Alternative 1 associated with geologic hazards, and impacts would be considered less than significant and similar to the Project.

**Hazards and Hazardous Materials**

Under Alternative 1, impacts to hazards and hazardous materials would be incrementally less severe in some instances, but incrementally more severe in others when compared to the Project.

*Impact HAZ-1:* Under Alternative 1, cannabis activities would be consolidated into a smaller area of the County, primarily on AG-II zoned lands, and other commercial and industrial zoned properties, which could increase risks of upset in some areas but reduce risk in others. Cannabis cultivation would be subject to existing laws and regulations governing the cultivation of commercial food products and associated hazardous activities. Therefore, impacts would be similar to the proposed Project and remain less than significant.

*Impacts HAZ-2:* Similar to the Project, impacts from former oil or gas pipelines or well facilities on lands subject to cannabis activities may occur under Alternative 1. However, compliance with federal and state regulations, County policies and regulations, and permit review processes would reduce impacts. Therefore, impacts related to hazards and hazardous materials associated with cannabis activities would be similar to the Project and less than significant.

*Impacts HAZ-3:* Similar to the Project, under Alternative 1, impacts may also occur from the use, storage, or distribution of hazardous or toxic materials for cannabis activities, similar to the Project. 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, and impacts would remain less than significant with mitigation.

*Impact HAZ-4:* While cannabis activities on eligible parcels would be subject to various levels of fire hazards, the level of impacts under Alternative 1 would be greater than the proposed Project. Under Alternative 1 cannabis activities would be sited in more remote and rural areas of the County where AG-II zoned lands are situated and where the emergency access and evaluation may be more limited and more timely (e.g., Tepusquet Canyon, Gaviota Coast, Cuyama Valley), which could expose cannabis cultivators, manufacturers, retailers, distributors, testers, and employees, neighboring populations, as well as wildlife to greater fire hazards. Cannabis activities would be subject to CalFire defensible space requirements, County Building Code requirements, and County Fire Code regulations to ensure protection of proposed facilities from wildfire hazards. Therefore, impacts associated with wildfire hazards of siting new facilities and operations would be less than significant.

**Hydrology and Water Quality**

Under Alternative 1, impacts to hydrology and water quality could be similar to the Project.

*Impact HWR-1:* Alternative 1 would prohibit all cannabis activities on AG-I zoned lands, which would greatly limit the lands eligible for cannabis activities within the County, but would not significant
affect the potential for introduction of sediments or pollutants into surface runoff or stormwater flows. Compliance with federal, state, and County regulations would minimize most impacts to surface waters. Similar to the Project, Alternative 1 would include project requirements to protect water quality, such as prohibiting cultivation within proximity to streams or within the high-water mark (HWM) of a water body. Implementation of MM HWR-1, Cannabis Waste Discharge Requirements Draft General Order, would reduce impacts to less than significant with mitigation and would be similar to the Project.

Impact HWR-2: Under Alternative 1, impacts to groundwater supplies from cannabis cultivation would be similar to impacts under the Project. Compliance with state and local regulations governing water quality would ensure that cannabis cultivation use BMPs that would limit impacts where the aquifers intersect with the ground surface. Expansive cannabis activities in locations that are especially vulnerable to surface pollutants could result in potentially significant impacts. With implementation of MM HWR-1, Cannabis Waste Discharge Requirements Draft General Order, impacts would be less than significant with mitigation and similar to the Project.

Impact HWR-3: Alternative 1 would result in greater impacts than the Project, particularly when cannabis cultivation is directed to AG-II zoned lands where any increase in groundwater extraction would impact the level of supply available in the aquifers. Higher groundwater impacts may occur in rural areas where there are AG-II zoned lands, and where there may be scarcer groundwater supplies, and overdrafted groundwater basins, including the Goleta, Buellton Uplands, Santa Ynez Uplands, Lompoc, San Antonio, Santa Maria, and Cuyama Groundwater Basins. However, concentration of cannabis activities to AG-II lands is not anticipated to substantially increase impacts to groundwater resources beyond those identified under the Project, and impacts would be similar. Implementation of the modified County standard condition of approval WatCons-01 Water Conservation-Outdoor, MM HWR-3, Water Conservation–Water Efficiency for Cannabis Cultivation would further reduce impacts under Alternative 1 to less than significant with mitigation.

Impact HWR-4 and HWR-6: While the lands eligible under Alternative 1 are limited and located in more rural areas of the County compared to the AG-I zoned lands, impacts related to existing drainage patterns are expected to be similar to the Project. New greenhouses, buildings, or other cannabis-related structures would have the potential to increase concentrated runoff, but this development would be subject to existing County regulation and permitting, which would minimize adverse effects of runoff through adherence to applicable regulations, including the County’s Grading Code. With adherence to design features and applicable regulations that would apply under Alternative 1, impacts would be considered less than significant.

Impact HWR-5: While the lands eligible under Alternative 1 are limited and the alternative may direct cannabis activities to AG-II zoned lands located in rural areas of the County, impacts related to surface and groundwater quality are expected to be similar to the proposed Project. Similar to the Project, all new cannabis activity operations under Alternative 1 would be required to be designed and constructed in accordance with state and County codes regulating water efficiency. Additionally, grading required to construct new site buildings would occur in accordance with the County’s Grading Ordinance. Further, compliance with state and local regulations governing water quality, would ensure that cannabis cultivation use BMPs that would limit impacts where the aquifers intersect with the ground surface and are especially vulnerable to surface pollutants. Compliance with existing regulations and requirements would ensure surface and groundwater quality impacts are less than significant.
Land Use and Planning

Under Alternative 1, impacts to land use and planning could be incrementally less severe than under the Project.

Impact LU-1 and LU-2: Similar to the proposed Project, where lands would be eligible for licenses under Alternative 1, there is a potential for land use inconsistency. Cannabis activities would not be allowed within AG-I zoning districts, reducing potential neighborhood compatibility issues or perceived change in quality of life in the areas, particularly in neighborhoods where the AG-I zoning districts abut residential uses (e.g. Carpinteria and Lompoc Valley). While some land use conflicts may increase in AG-II zoning districts near sensitive receptors and nearby residences, potential adverse impacts on the surrounding existing communities would be reduced compared to the proposed Project. Also, because the regulations, restrictions, and development standards under Alternative 1 would be the same as the proposed Project, these would regulate cannabis activities and restrict potential neighborhood incompatibility. Implementation of **MM LU-1, Public Lands Restriction**, would reduce impacts to less than significant with mitigation.

Noise

Under Alternative 1, impacts to noise would be similar to the proposed Project.

Impacts NOI-1 and NOI-2: Construction and operation of cannabis cultivation, distribution, manufacturing, processing, testing, and retail sales facilities allowed under Alternative 1 would result in similar noise impacts as under the proposed Project. Construction noise increases would be temporary and existing County policies and proposed development standards would minimize short-term and long-term operational noise impacts. Proposed cannabis activity projects would be subject to the policies and standards contained within the proposed County’s Comprehensive Plan that aim to reduce both construction-related and operational noise impacts. Therefore, short-term impacts from construction would be less than significant. Nevertheless, while implementation of **MM AQ-3, Cannabis Site Transportation Demand Management**, would ensure that potentially significant impacts resulting from roadway noise and congestion under long-term Project operations are reduced, similar to the Project, there is no feasible way to ensure vehicle noise increase from Project traffic would not exceed County thresholds, and impacts under Alternative 2 associated with operational noise would remain significant and unavoidable.

Public Services

Under Alternative 1, impacts to public services could be incrementally more severe than under the Project.

Impacts PS-1 and PS-2: Impacts from cannabis activities under Alternative 1 would increase demand for fire protection and police protection, as compared to the proposed Project. Impacts to Alternative 1 would result in similar impacts to parks, schools, libraries, and other public services when compared to the Project. Under Alternative 1, cannabis activities would be directed towards the more rural areas of the County as compared to the urban areas near Carpinteria and Lompoc Valley under the proposed Project.

Fire Protection: Alternative 1 restricts cannabis activities in the AG-I zoning district and reduces the amount of eligible land in already established agricultural areas of the County; therefore, the potential for future cannabis related development to be located in rural areas containing high fire risk zones
would be increased. Implementation of this alternative would also likely result in related increases in employee populations in high fire risk zones, which would increase demand on fire protection services in rural areas as compared to the Project. As a result, the increase of licensed cannabis-related activities in remote areas under Alternative 1 could exacerbate demand for fire protection and emergency response services during wildfires, particularly along narrow rural roads, which are common in the AG-II zoning district. Cannabis activity sites that would likely be located in remote areas of the County also potentially would result in longer response times and limited emergency access, increasing impacts on fire protection and emergency services as compared to the Project. However, compliance with the County Comprehensive Plan goals and policies and County Code, among other state requirements, would reduce the overall risk of wildfires and impacts would be less than significant, but incrementally greater than the proposed Project.

Police Protection: Cannabis activities in the County under Alternative 1 would have the potential to incrementally increase demand for police and emergency services in rural areas of the County. Under Alternative 1, cannabis activities could be sited in more remote and rural areas of the County where emergency access may be more limited, resulting in longer response times. Because Alternative 1 disallows cannabis activities in the AG-I zoning district, which is usually closer to established residential neighborhoods and existing police services, potential new police service facilities may be required under Alternative 1, which would increase impacts as compared to the Project. Compliance with the County Comprehensive Plan goals and policies, County LUDC, and the County Code, among other state requirements, would ensure that police protection service demands are met. As a result, impacts under Alternative 1 would be greater than the proposed Project, but would remain less than significant.

Parks, Schools, Libraries and Other Public Services: Similar to the proposed Project, Alternative 1 would generate additional cannabis-related jobs, which would increase the employee population of the County and therefore contribute to increased demand for housing, as well as increased demand on parks, schools, libraries, and other public services. Over time, Alternative 1 would likely result in a higher concentration of population in rural areas of the County associated with the industry, as compared to the urban areas near Carpinteria and Lompoc Valley under the proposed Project. Increased demand for parks, schools, libraries, and other public services in rural areas of the County may result in the need to develop new public facilities to meet increased demand. However, as discussed in Section 3.11, Public Services, an increase in employment and associated population increase would not represent a significant increase in demand for these public services. Ultimately, impacts would remain less than significant, and similar to Alternative 1.

**Transportation and Traffic**

Under Alternative 1, impacts to transportation and traffic could be incrementally more severe than under the Project.

*Impact TRA-1:* Similar to the proposed Project, impacts of cannabis cultivation under Alternative 1 could result in increases in traffic and daily vehicle miles of travel affecting the performance of the existing and planned circulation system. For Alternative 1, impacts associated with consistency with transportation plans and programs, traffic increases, and consistency with plans and policies regarding public transit, bicycle, and pedestrian facilities would be significant and unavoidable.
Consistency with Transportation Plans and Programs

Like the proposed Project, Alternative 1 has a reasonable potential to result in exceedance of growth projections for the agricultural and manufacturing industries within the County. As such, employment and population growth and associated vehicle trips and VMT from cannabis activities may exceed forecasted conditions, and therefore would be inconsistent with SBCAG’s RTP/SCS. Therefore, these impacts under Alternative 1 are similar to those under the proposed Project.

Increases in Traffic

Similar to the Project, while there is some uncertainty and variability regarding future cannabis operations, due to estimated increases in traffic, implementation of Alternative 1 has the potential to introduce new vehicle traffic to County roadways and intersections, such that the County's thresholds for traffic related impacts are exceeded. These impacts are expected to be greater under Alternative 1, as trips may be more dispersed throughout the rural areas of the County, rather than concentrated in urban areas, and agricultural districts, like Carpinteria. As result, implementation of Alternative 1 is considered to have a potentially significant impact with regard to traffic, traffic volumes, and consistency with the CMP. Implementation of MM TRA-1, Payment of Transportation Impact Fees, and MM AQ-3, Cannabis Site Transportation Demand Management, would be required to reduce impacts to roadways and intersections under the jurisdiction of the County. Traffic impacts under Alternative 1 would be similar to those under the proposed Project.

Consistency with Plans or Policies Regarding Public Transit, Bicycle, or Pedestrian Facilities

While Alternative 1 does not include features which would directly affect the performance or safety of transit, bicycle, or pedestrian facilities, it would allow new cannabis uses in existing compatible zoned areas, which may induce employment industry growth, and subsequent demand for such facilities. As Alternative 1 does not include changes in existing land use or zoning patterns, or new development which would directly affect current or proposed transit, bicycle, or pedestrian facilities, Alternative 1, like the proposed Project, is not considered to conflict with applicable plans, policies, or programs for these facilities. As a result, impacts would be less than significant. Impacts under Alternative 1 would also be greater than the proposed Project, because at a programmatic level this alternative directs cannabis cultivation to AG-II zoning districts located in rural areas of the County, which would result in fewer work trips using alternative modes of transportation, mainly because fewer facilities are located in the rural areas of the County.

Impact TRA-2: Licensed cannabis operations could be located within areas of the County or along roadways currently subject to hazardous road conditions. In particular, Alternative 1 would have the potential to reduce roadway safety or introduce new roadway hazards, such that the County’s adopted significance criteria for traffic and roadway safety are exceeded, particularly within areas with known hazardous roadway conditions, such as the rural winding roads of Tepusquet Canyon and SR 192 where existing agricultural operations may result in roadway compatibility issues with nearby urban residential development. Implementation of MM TRA-1, Payment of Transportation Impact Fees, and MM AQ-3, Cannabis Site Transportation Demand Management, would reduce impacts to roadways safety and emergency access, but they would remain significant and unavoidable. These road safety impacts would be slightly greater under Alternative 1, as it directs cannabis activities to the AG-II zoning districts, which are spread across the County in rural areas, and where more narrow and winding roads may be present when compared to the urban areas of the County.
Utilities and Energy Conservation

Under Alternative 1, impacts to utilities and energy conservation could similar to the Project.

*Impact UE-1*: As total water use, wastewater, and solid waste is expected to be consistent between Alternative 1 and the proposed Project, the resulting impacts on new demand for water, wastewater, and solid waste utility services, supplies, and infrastructure would be similar due to a comparable amount of anticipated future operations. Therefore, impacts on water supply, wastewater services, and existing infrastructure for Alternative 1 similar to the Project and remain *less than significant*.

It is not anticipated that Alternative 1, like the proposed Project, would result in substantial new wastewater generation, as cannabis cultivation typically results only in the generation of agricultural runoff from outdoor cultivation sites and the disposal of mineral-nutrient rich water used in hydroponic operations is regulated separately from municipal wastewater. Similarly, Alternative 1 would generate solid waste both during construction of new cannabis sites and during operation of such facilities, but because operations would comply with federal, state, and local regulations, impacts associated with the disposal of solid waste generated from cannabis activities are considered *less than significant*. Both wastewater and solid waste impacts under Alternative 1 are expected to be similar to the proposed Project.

*Impact UE-2*: Under Alternative 1, cannabis cultivation would not be permitted in the AG-I zoning district, but other eligible areas within the County are located entirely within the PG&E and SCE service territories, and these utilities providers have supplies available to meet existing and future utilities demands. While the proposed project may have the potential to result in the wasteful or inefficient use of electricity through the operation and powering of facilities and equipment, the implementation of *MM UE-2a, Energy Conservation, MM UE-2b, Participation in a Renewable Energy Choice Program*, and *MM UE-2c, Licensing by the County Green Building Committee*, would reduce impacts to *less than significant* with mitigation.

While Alternative 1 may result in additional demand for electricity, this alternative is not anticipated to result in the substantial new demand for natural gas supplies, as natural gas is not typically required as part of cannabis cultivation or manufacturing operations. As such, energy impacts related to natural gas usage would be *less than significant*. Similarly, given there would be a foreseeable, but negligible increase in regional and statewide demand and use of vehicle fuels under Alternative 1, this increase is not anticipated to constrain available supplies or result in the wasteful use of such resources to a substantial degree. As a result, energy impacts related to fuels would be *less than significant*.

*Impact UE-3*: Similar to the Project, under Alternative 1, licensees would be required to submit applications, including detailed site plans, if necessary, that would be subject to discretionary review by the County Planning and Development Department and would be subject to similar review requirements at the state level, which would ensure further consistency with standards for energy and building design. Therefore, impacts are *less than significant* and anticipated to be similar to the proposed Project.

Population, Employment, and Housing

Under Alternative 1, impacts to population, housing, and employment would be similar to the Project.

*Impact PEH-1*: Similar to the Project, impacts of Alternative 1 could induce population growth from an increase of full-time cannabis employees Countywide, yet is not expected to exceed total local and
regional growth estimates under the County Comprehensive Plan. Alternative 1 would disallow cannabis activities in the AG-I zoning district, which may direct more activities to the AG-II zoning district and as a result incrementally increase new employee housing demand in more remote, rural areas of the County. However, demand for housing under this alternative, like the Project, would be dispersed throughout the County and would not occur at a rate which would exceed local or regional growth projections. With implementation of MM PEH-1, In Lieu Fees, impacts associated with demand for housing would be similar to the Project and remain less than significant with mitigation.

**Conclusion and Relationship to Project Objectives**

Alternative 1 would not reduce any significant impacts to a less than significant level. This alternative would primarily result in similar environmental impacts to the majority of resource areas. Impacts to air quality and GHG emissions and land use and planning would be incrementally less than the proposed Project. Impacts to public services and transportation and traffic would be incrementally more adverse than the Project. Similar to the proposed Project, impacts to aesthetics and visual resources; agricultural resources; biological resources; cultural resources; hydrology and water quality; noise; utilities and energy conservation; and population, employment, and housing would result in a similar degree of impacts. Additionally, aesthetics and visual resources; agricultural resources; air quality and greenhouse gas; biological resources; cultural resources; hydrology and water quality; land use and planning; noise; transportation and traffic; utilities and energy conservation; and population, employment, and housing would subject to feasible mitigation. Further, the classification of all impacts under Alternative 1 would be the same as those under the proposed Project, including significant and unavoidable impacts to agricultural resources; air quality and greenhouse gas emissions; noise, and transportation and traffic.

Adoption of Alternative 1 would achieve most of the Project objectives which include regulating cannabis activities within the County; providing an efficient and clear cultivation and manufacturing permit process and regulations; and regulating sites and premises to avoid degradation of the visual setting and neighborhood character, odors, hazardous materials, and fire hazards. However, adoption of Alternative 1 would not achieve some of Project objectives, including those related to development of a robust and economically viable legal cannabis industry; encouraging businesses to operate legally and secure a license to operate in full compliance with County and state regulations; minimization of adverse effects of cultivation and manufacturing and distribution activities on the natural environment; and maximization of the proportion of licensed activities by minimization of unlicensed activities. Because this alternative would make numerous existing cannabis activity sites ineligible in the AG-I zoning district, implementation of this alternative may result in existing cannabis cultivators and product manufacturers to continue to operate illegally without obtaining a license to operate in full compliance with County regulations.

**4.2.3 Alternative 2 — Preclusion of Cannabis Activities from Williamson Act Land Alternative**

This alternative considers environmental impacts under a modified set of licensing regulations that would reduce the area of eligibility on lands that are subject to a Williamson Act contract in the County where licenses may be issued for cannabis cultivation activities.

Under the Preclusion of Cannabis Activities from Williamson Act Land Alternative (Alternative 2), cannabis activities would be precluded from Williamson Act provisions that govern agricultural
preserve contracted lands, and instead would be considered a compatible use. Cannabis cultivation activities would be prohibited on all Williamson Act lands with the exception of a maximum of 22,000 sf cannabis canopy cover for each Williamson Act contract. Cannabis would not be considered an agricultural commodity, and lands used for the purpose of cultivating, producing, or manufacturing would not be considered an agricultural use. “Cannabis” and “cannabis products” would be provided with their own definitions and requirements. Agricultural use data for commercial production and reporting that would be used to determine compliance with minimum productive acreage and annual production value requirements would not include cannabis activities. Additionally, the following provisions would be included as amendments to the County Uniform Rules:

- The cultivation of cannabis, including the planting, growing, harvesting, drying, curing, grading, or trimming of cannabis, as may be permitted by the County, may be considered compatible on agricultural preserve contracted land if the activity is consistent with the compatibility guidelines of the established Uniform Rules and does not hinder or impair the short-term or the long-term agricultural uses and activities on the premises or on other properties in the vicinity;

- The following cannabis related uses and activities are expressly deemed incompatible uses on agricultural preserve contracted land: manufacturing, testing of cannabis grown off-premises, retail sales, distributing, dispensing, and marketing of cannabis or cannabis products; and

- Only one land use entitlement, one State license, and one local license (Type 3) for cannabis cultivation may be issued for the premises.

This alternative would result in limiting the potential for cannabis activities on over 50 percent of eligible County area, and eliminate hundreds of potential license applications from occurring on Williamson Act lands.

The intent of this alternative is to reduce impacts on lands subject to Williamson Act contracts by reducing the level of licensed cannabis activities on Williamson Act lands, thus potentially increasing cannabis activities on non-Williamson Act lands, as well as within commercial and manufacturing zone districts. The Williamson Act lands restrictions would be implemented through development standards and zoning regulations included under this alternative to reduce the area of eligibility compared to the proposed Project (Figure 4-2). Under Alternative 2, the opportunities for the cannabis industry could become limited, as the most developed agricultural areas are within Williamson Act lands, including a majority of agricultural lands within the Santa Maria, Lompoc, and Santa Ynez Valley regions, in addition to approximately half of Carpinteria Valley.

Williamson Act lands make up approximately 513,470 acres, which comprises approximately 62 percent of all County land. Compared to the 671,023 acres eligible under the Project for cultivation, this would result in an approximate 77 percent reduction of land availability to 157,553 acres (not including the eligibility for one license permitted per Williamson Act contract, which would comprise a maximum of 22,000 square feet of cannabis canopy per contract, or 0.51 acre, per contract). Under the Project, total future demand of cannabis canopy size within Williamson Act parcels is approximately 176 acres, according to 2017 Cannabis Registry data. Under Alternative 2, all contract lands would be eliminated from eligibility (except for up to 22,000 square feet per Williamson Act contract), although licensees may still locate anywhere within the reduced areas of eligibility in AG-I, AG-II, commercial, and manufacturing zoned lands.
As identified in the 2017 Cannabis Registry data, 39 registry respondents indicated they are currently cultivating on Williamson Act lands, with at least 166 acres of cannabis canopy, representing approximately 44 percent of the total existing acreage. Although the number of known cultivation sites only accounts for approximately 29 percent of known locations, these sites on Williamson Act contract lands may comprise nearly half of all existing cannabis production in the County. (See Table 4-2) The distribution and quantity of known cannabis cultivation sites enable a representative comparison of the portion of lands for which the registrants may qualify under Alternative 2, compared to the Project. Considering that a Williamson Act contract location could be subject to one license, and the largest available license type is Type 3 with up to 22,000 square feet of cannabis canopy, the 39 Registry respondents at known locations could utilize up to 19.7 acres, resulting in an 88 percent decrease of existing cannabis canopy area within these lands. Because nearly half of existing cannabis canopy acreage occurs within Williamson Act lands, this alternative may result in the relocation of existing operations if production of 0.51 acres of cannabis canopy hinders existing operations. If the total acreage of cannabis canopy remains the same as the Project, this could result in the relocation of the remaining approximate 146 acres of cannabis canopy on Williamson Act lands to other eligible areas of the County. Additionally, within the Carpinteria Valley, there are a total of 122 acres of greenhouse-type structures within Williamson Act land, representing 27 percent of total Carpinteria greenhouses. Of those, 52 acres are greenhouses, 45 acres are hoop structures, and 26 acres are shade structures.

### Table 4-2. Comparison of Registrant-Provided Cultivation Sites under the Project and Alternative 2

<table>
<thead>
<tr>
<th></th>
<th>Proposed Project (activity sites)</th>
<th>Cannabis Canopy (acres)</th>
<th>Alternative 2 (activity sites)</th>
<th>Cannabis Canopy (acres)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Total Known Cultivation Sites</strong></td>
<td>134</td>
<td>134</td>
<td>134</td>
<td>134</td>
</tr>
<tr>
<td><strong>Unaffected by Williamson Act Lands</strong></td>
<td>134 (100%)</td>
<td>376 (100%)</td>
<td>95 (71%)</td>
<td>210 (56%)</td>
</tr>
<tr>
<td><strong>Potentially Affected by Williamson Act Lands</strong></td>
<td>0 (0%)</td>
<td>--</td>
<td>39 (29%)</td>
<td>166 (44%)</td>
</tr>
</tbody>
</table>

Alternative 3 would reduce the total amount of area available to support cannabis cultivation compared to the proposed Project. This Alternative could involve relocation or abandonment of major known cannabis operations located on Williamson Act Lands, potentially leading to their relocation to currently undeveloped areas. This alternative could redistribute the concentration of the current cannabis cultivation businesses from Williamson Act AG-I and AG-II commercial agricultural areas to AG-I and AG-II-zoned lands not under Williamson Act contracts.

For this alternative, existing registrants may need to relocate manufacturing and distribution operations to within the reduced area of eligibility, potentially limiting the opportunity for businesses to secure a license in the County. As compared to the proposed Project, the approximate total area of eligibility for cannabis product retail sales and testing under this alternative would remain the same. Under Alternative 2, cannabis activity sites currently operating within the AG-I zone district would potentially become legal nonconforming uses upon adoption. An unknown number of these sites would be able to remain at their current location, while others may need to relocate. Those sites which remain within the AG-I zone district would not be able to expand or substantially change use, or risk becoming an illegal operation.
Alternative 2 – Preclusion of Cannabis Activities from Williamson Act Land Alternative
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With the restriction under this Alternative of one license per existing Williamson Act contract, registrants with more than one parcel under a Williamson Act contract may attempt to split their contract into multiple contracts between their respective parcels, in order to acquire more licenses within a proximate area and retain profitability. For those with larger parcels, they may pursue parcel maps or tract maps to enable the creation of additional eligible parcels under additional Williamson Act contracts, thus increasing the number of cannabis licenses to hold. These options would involve a difficult approval process, including a potentially costly investment and time commitment, which may also result in the relocation of the registrant.

Under this alternative, unlike the Project, registrants would not be able to utilize growing the cannabis crop to fulfill Williamson Act requirements. Considering this, the registrant may decide to non-renew a land’s enrollment in its Williamson Act contract in order to obtain multiple licenses on the property. Due to requirements under the Williamson Act, this would take ten years to complete, not including the time put towards fulfilling application requirements and approval. By that time, the unlimited cultivation licenses (Type 5) which become available in 2023, would already be available, and potential parcel maps or tract maps would not be beneficial to the registrant. Therefore, under Alternative 3, it may also be assumed that larger lands under a Williamson Act contract may experience a higher amount of development after 2023, though without manufacturing or distribution facilities disallowed under this Alternative, and remain primarily used for other soil crops which contribute to land eligibility for Williamson Act contracts.

As discussed above, although restrictions could drive some growers into conducting illegal cultivation operations, in areas such as LPNF, places with dense vegetation, or are otherwise readily concealed, the existing industry in the County is primarily that of major agricultural operations (including use of hoop structures and greenhouses). These types of operations are unlikely to relocate to illegal areas that are screened or within more rural, removed areas. Instead, it is anticipated that these operations which cannot obtain licensing are more likely to relocate outside of the County to areas with different or reduced regulatory oversight, such as the counties of Mendocino, Calaveras, Monterey, or Humboldt.

**Potential Impacts to Resource Areas**

Limiting use of more than half of the existing agricultural lands in the County, including greenhouses and other existing infrastructure, for cannabis activity use, which are currently utilized or proposed for cannabis cultivation, processing, packing, and potentially manufacturing could cause growth inducement in dispersed rural areas and near urban boundary areas away from commercial agriculture areas. Under Alternative 2, cannabis activity sites currently operating within Williamson Act lands would potentially become legal nonconforming uses upon adoption. An unknown number of these sites would be able to remain at their current location, while others may need to relocate. Those sites which remain within Williamson Act contract lands may need to reduce in size and would not be able to expand or substantially change use, or risk becoming an illegal operation.

**Aesthetics and Visual Resources**

Under Alternative 2, impacts to aesthetics and visual resources could be similar to the Project. Preclusion of cannabis activities from 513,00 acres of Williamson Act lands (73 percent of eligible area Countywide) would redirect cannabis related growth to less developed agricultural areas and areas more suited to urban services. Development of cannabis facilities on undeveloped lands may involve vegetation clearing and grading or construction of new agricultural structures with resultant
visual changes. Such areas may be located proximate to State Scenic Highways such as US Hwy 101 through the Gaviota Coast, Highway 154 through the Santa Ynez Valley, or other local scenic rural County roads.

**Impact AV-1 and AV-2:** Under Alternative 2, a portion of the existing registrants may seek to relocate ineligible cannabis sites on Williamson Act lands to eligible cannabis sites on other AG-I and AG-II zoned lands or commercially-zoned lands, and a higher density of indoor, outdoor, and greenhouse cannabis development may occur within the reduced eligible zones. Given the potential for additional greenhouse and structural development to alter the visual character of more visible scenic rural areas of the County where some non-Williamson Act agricultural lands are located, impacts would be considered *potentially significant.* However, similar to the Project, proposed development criteria and restrictions would assist in the protection of visual resources and scenic views. The Comprehensive Plan, LUDC, MLUDC, and CZO, include siting requirements and design standards that address preservation of scenic views and ensure development is compatible with existing aesthetic and visual resources would ensure compatibility with the surrounding landscape and reduce the visual impacts associated with cannabis activities so that the Alternative 2 would not substantially degrade the visual character of the County's rural areas.

Under Alternative 2, impacts to scenic resources in rural areas would be greater than under the proposed Project because greater amounts of grading, vegetation clearing, and construction on undeveloped and publicly visible slopes would occur than in areas subject to Williamson Act contracts, with a similar range of impacts for all other aesthetic resources. These increased visual impacts serve to preserve scenic views less than under the proposed Project, including those of the San Rafael Mountains in the Gaviota region, coastal scenic vistas and views of the Pacific Ocean in the Santa Maria, Lompoc Valley, and South Coast regions, and the rural areas of the Santa Ynez and Santa Maria regions. Further, site locations within the County on Williamson Act contract lands which continue to engage in cannabis activities, both known and unknown, may be unwilling to enroll in the proposed Project. Such operations would not be subject to licensing criteria requirements, development standards, and regulations that serve to protect scenic vistas and visual character. The degree of impacts in rural areas would continue to be heavily reliant on the siting and design relative to viewsheds and visual resources within that area. Therefore, in combination with implementation of MM AV-1, Screening Requirements, impacts would still be reduced to *less than significant with mitigation.*

**Agricultural Resources**

Under Alternative 2, impacts to agricultural resources would be incrementally reduced compared to the Project.

**Impact AG-1:** Agricultural resources impacts under Alternative 2 from cannabis cultivation activities would be similar to the proposed Project in regards to agricultural land use compatibility, and incrementally greater in regards to the potential for some operators within Williamson Act contract lands to discontinue contract renewal over the next ten years. Because cannabis would not be permitted in areas greater than 22,000 square feet under each Williamson Act contract and would not be identified as an “agricultural product” for Alternative 2, preclusions on cannabis cultivation would not necessarily conflict with the other agricultural uses for agriculturally zoned lands to produce agricultural products. Limiting the amount of cannabis cultivation on existing Williamson Act agricultural lands would not lead to a conversion of agricultural soils or conflict with existing agricultural zoning or Williamson Act contracts. Further, existing cannabis cultivation activities
exceeding 22,000 square feet in area on Williamson Act lands may be scaled back in size or relocated to lands not under a Williamson Act contract. While this may reduce the area of Williamson Act lands cultivated with cannabis crops, it may also result in a reduced number of people who would enroll in the licensing program, due to the potential that they may be required to reduce the profitability of their current operations by scaling back production under this alternative. Therefore, unlicensed cannabis operations on lands under a Williamson Act contract would likely continue.

When licensed, cultivation activities would be permitted as a compatible use within AG-I and AG-II zoned lands to avoid conflicts with the established integrity of the agriculturally zoned lands. Cannabis cultivation activities would be allowed on AG-I and AG-II zoned lands as a compatible use, therefore there would not be conflicts with established uses for agriculturally zoned lands. Because it is anticipated that the majority of cannabis cultivation activities would register under the proposed Project, Alternative 2 would result in less impacts towards the established integrity of agriculturally zoned lands. Additionally, implementation of MM AG-1, Cultivation Prerequisite to Ancillary Use Licenses would ensure manufacturing and distributing activities are subsidiary uses to support the agricultural use of agriculturally-designated County lands. As a result, Alternative 2 would result in a less than significant impact with mitigation.

Impact AG-2: Cannabis cultivation activities under Alternative 2 could impair the production of other agricultural products; however, given that cultivation demand by Project registrants would be reduced under Alternative 2, impacts from the cultivation of cannabis pursuant to Alternative 2 would not result in substantial conversion of Prime Farmland, Farmland of Statewide Importance, or Unique Farmland to non-agricultural use. Similarly, cannabis cultivation is unlikely to lead to 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. While existing cannabis operations may not obtain the requisite licenses and entitlements to operate in the program, or relocate to other areas because their existing operations exceed the area standards of Alternative 2, it is anticipated that the majority of cannabis cultivation activities would comply with the adopted development standards. Because Alternative 2 reduces cannabis cultivation activities on Williamson Act lands to 22,000 square feet per contract, this alternative would be expected to result in 166-acre reduction in cannabis cultivation on Williamson Act lands if all existing and proposed cannabis operations comply with the proposed standards, resulting in fewer impacts associated with the loss of other agricultural resources specifically on Williamson Act lands, based on the preclusion of cannabis as an agricultural use under this alternative. However, this quantity of cultivation may relocate to other eligible areas of the County within agriculturally-zoned lands not fully supported by lands and infrastructure contracted under the Williamson Act, including level agricultural fields, ancillary agricultural structures, roads, and additional agricultural buildings. Therefore, areas of the County within eligible areas outside of Williamson Act contracts designated for prime farmland or farmland of statewide importance, such as east of Santa Maria, southwest of New Cuyama, or northwest and south of Santa Ynez, may experience heightened development and associated loss of soil for infrastructure installation for cannabis activities. Nevertheless, most prime soil would be protected by Williamson Act contract land provisions. For instance, this alternative may reduce impacts of the loss of tens of acres of prime soils from the construction of concrete floor greenhouses, packing sheds, and similar infrastructure. Mitigation measures to minimize impacts would include development standards to require avoidance of prime soils and productive agricultural land to the maximum extent feasible. Because concrete floor greenhouse, packing sheds, processing outbuildings, and road and parking areas are all allowable for agricultural uses or to support such uses, it would not be possible to completely avoid loss of prime soils, and implementation of MM AG-2, New Structure Avoidance of
Prime Soils, would remain necessary to reduce impacts. Therefore, conversion of agricultural lands from future cannabis activity development under Alternative 2 would be less severe than the Project and significant and unavoidable.

**Air Quality and Greenhouse Gas Emissions**

Under Alternative 2, adverse impacts to air quality and associated impacts related to GHG emissions could be incrementally greater than under the Project.

**Impact AQ-1:** Impacts under Alternative 2 would be similar, though incrementally increased from the proposed Project. Preventing all cultivation, manufacturing, and distribution activities from occurring on Williamson Act lands under Alternative 2 would likely increase the range of pollutant concentrations and objectionable odors to sensitive receptors and residences throughout the County. As mentioned above, approximately 44 percent (166 acres) of existing cannabis canopy is located on Williamson Act lands. This area would potentially be reduced to approximately 19.7 acres, and approximately 146 acres of existing cannabis operations, along with a potential future 730 acres, may be sited on other agricultural areas, where the AG-I and AG-II zoned lands are located primarily within the Cuyama region, the coastal areas of Lompoc Valley, and the rural areas of the Santa Ynez and Santa Maria regions of the County, which could increase the cumulative effect of criteria pollutants in these regions through more new grading/construction and scattered operational activities. Further, concentrating cannabis cultivation facilities to other areas within each region of the County would increase the cumulative effect of odors within these concentrated areas and sensitive receptors nearby concentrated areas. Therefore, impacts would be incrementally greater than the proposed Project and would remain significant and unavoidable given there is not feasible mitigation to lessen the impact associated with the inconsistencies between the Project and Alternative 2 and the County’s Clean Air Plan.

**Impact AQ-2:** Construction emissions from cannabis activities under Alternative 2 would likely be greater than the proposed Project as up to approximately 146 acres of existing cannabis canopy may be relocated to non-Williamson-Act lands. Even so, similar to the Project, short-term construction emissions associated with cannabis cultivation activities are not expected to violate any air quality standards and would be less than significant.

**Impact AQ-3:** Long-term operation emissions impacts under Alternative 2 may be reduced or when compared to the Project, depending on the reduction of cannabis operations from lands under Williamson Act contract to the reduced area of eligibility, potentially creating additional pockets of concentrated cannabis activity areas. Similar to the proposed Project, impacts resulting from air pollutant emissions generated by stationary sources during operation of licensed cannabis facilities would be less than significant. Similar to the Project, despite implementation of **MM AQ-3, Cannabis Site Transportation Demand Management**, impacts under Alternative 2 resulting from air pollutant emissions generated by mobile sources would remain significant and unavoidable.

**Impact AQ-4:** Impacts from cannabis activities under Alternative 2 could be potentially inconsistent with SBCAG’s negative growth projections or the Energy and Climate Action Plan. While the proposed Project and Alternative 2 both promote an orderly, efficient, and defined licensing and permit process for cannabis activities, both options would similarly result in growth in the agricultural and manufacturing sectors beyond what is forecasted in the CAP. As such, implementation of Alternative 2 would be inconsistent with the CAP, and in turn, also with the ECAP. Therefore, Alternative 2 would result in potentially significant impacts to GHG emissions and climate change that would be similar to
the proposed Project. Similar to the proposed Project, because there is no feasible mitigation, this impact would be significant and unavoidable.

**Impact AQ-5:** Impacts from odors and site emissions would occur under Alternative 2, and may be increased compared to the proposed Project. Because there would be a reduced area of Williamson Act lands eligible for cannabis cultivation, potential odors and site emissions that would originate from cannabis activities on Williamson Act lands may be reduced. However, these are located in rural areas that are already subject to similar agricultural odors, and replacement agricultural activities would likely generate a similar type and quantity of odors. As discussed above, approximately 146 acres of existing cannabis canopy and any future potential 730 acres may be sited within other portions of the County outside of lands designated for agricultural purposes. These acres of cannabis canopy may be located closer to urban areas, including sensitive receptors, a higher concentration of people, and residential neighborhoods. Cultivation operations located on agricultural parcels in the rural areas of the County may be several miles to hundreds of miles from sensitive receptors. As a result, Alternative 2 may incrementally increase odor and site emission impacts throughout the County. However, as with the proposed Project, implementation of **MM AQ-5, Odor Abatement Plan (OAP)**, would ensure that impacts under Alternative 2 resulting from potential nuisance odors would be reduced. However, there remains the potential for odors to present a nuisance to neighboring receptors. Given the difficulty in being able to effectively contain or eliminate cannabis odors, and the potential for odors to be perceived as a nuisance despite implementation of odor control measures, additional potential mitigation is considered infeasible. Therefore, as no additional feasible mitigation beyond the requirement for an OAP has been identified which could ensure the containment, elimination of generation, or detectability of cannabis odors, similar to the proposed Project, odor impacts under this alternative would remain significant and unavoidable.

**Biological Resources**

Under Alternative 2, impacts to biological resources could be more severe than under the Project. Preclusion of cannabis activities from 513,00 acres of Williamson Act lands (735 of eligible area countywide) would redirect cannabis related growth from these often already developed agricultural areas to less agriculturally-developed areas, such as those with native habitats or closer to urban uses. Development of cannabis facilities on undeveloped lands may involve vegetation clearing and grading or construction of new cannabis structures with resultant visual changes. Such undeveloped areas may support sensitive native habitats and special status species.

**Impacts BIO-1 and BIO-2:** Impacts under Alternative 2 could include disturbances to vegetation, individual species or populations, sensitive habitats or natural communities, as well as disturbance, modification, or destruction of habitat resulting from future development of cannabis cultivation sites. A majority of cannabis-related development would be precluded from Williamson Act lands, therefore future cannabis activity sites could potentially have impacts on existing biological resources located in the area of eligibility as up to 146 acres of cannabis canopy may be required to relocate in addition to a future potential 730 acres to smaller areas of the County, primarily AG-I and AG-II zoned lands that are non-Williamson Act lands, and some commercial and industrial zoned lands. Concentrating cannabis activities and relocating existing cannabis operations to areas with non-Williamson Act lands may increase the extent of impacts to unique, rare, threatened, and endangered species and sensitive habitats, particularly in areas of higher habitat value (e.g., areas that border mountainous and coastal areas near federal and state lands). However, similar to the Project, this alternative would implement **MM BIO-1a, Tree Protection Plan**, and **MM BIO-1b, Habitat Protection Plan**, to reduce habitat modification and disturbance impacts. Further, compliance with the County’s Setback...
Ordinance, which requires setbacks from sensitive biological resources, including but not limited to perennial streams, water bodies, and/or wetlands, would continue to reduce impacts to special-status species and sensitive habitats to a less than significant level with the implementation of identified mitigation measures.

**Impact BIO-3:** Under Alternative 2, impacts associated with the movement of any native resident or migratory species may be greater than the proposed Project, depending on the cumulative response of existing cannabis operations on Williamson Act contracts lands, because of a potential relocation of up to 146 acres of cultivation activities and potential future 730 acres that would be permitted adjacent to wildlife areas located outside of Williamson Act lands, which make up a large part of agricultural lands within the County. Nonetheless, compliance with County Comprehensive Plan policies and County Code, including LUDC, MLUDC, and CZO regulations and development standards, as well as proposed permitting requirements, would be required for cannabis activity sites to obtain a license, further reducing potential biological impacts. Additionally, the implementation of MM BIO-3, *Wildlife Fencing*, would ensure biological impacts are less than significant with mitigation.

**Impact BIO-4:** Impacts under Alternative 2 related to consistency with adopted local plans, policies, or ordinances oriented towards the protection and conservation of biological resources would be similar to the proposed Project. Even if there is a substantial relocation of existing cannabis cultivation sites on Williamson Act lands, Alternative 2 would require cannabis activities to demonstrate consistency with applicable policies, development standards, and existing habitat conservation plans, which would be reviewed on a case-by-case basis, similar to the proposed Project. Therefore, impacts associated with consistency with adopted plans, policies, and ordinances for protection and conservation of biological resources would be less than significant.

**Cultural Resources**

Under Alternative 2, impacts to cultural resources could be similar to the Project.

**Impact CR-1:** Under Alternative 2, cannabis cultivation that occurs on or near historic properties that are not on the County’s Historic Resources Inventory could potentially cause destruction, relocation, or alteration of existing historical resources. Alternative 2 may involve a greater potential impact area than the proposed Project, depending on the cumulative response of existing cannabis cultivation operations on Williamson Act lands. Therefore, there could be an increased potential for adverse effects to historical resources as existing cannabis cultivation sites are relocated to new sites. However, land clearing and modifications to existing structures near properties that are known to consist of significant historical resources may potentially have an adverse effect on the physical context of historic structures and diminish their historic value. Proposed cannabis activities would be subject to the LUDC, MLUDC, County Comprehensive Plan, and County Coastal Land Use Plan, which require avoidance of impacts to historic resources. Additionally, implementation of MM CR-1 (*CSMM CulRes-10*), *Preservation* would reduce impacts to existing and eligible historic structures. Therefore, similar to the Project, impacts under Alternative 2 would be less than significant with mitigation.

**Impact CR-2:** Although Alternative 2 would involve a smaller area of eligibility and therefore a smaller area of potential impact when compared to the proposed Project, Alternative 2 may increase the potential area for disturbance of undiscovered archaeological or paleontological resources, depending on the cumulative response of existing cannabis cultivation operations on Williamson Act lands, as existing cannabis cultivation sites could be relocated to new sites. Even without considering the relocation of sites, site preparation and grading activities for new developments could still inadvertently uncover archaeological, tribal, or paleontological resources, therefore, impacts would
be similar to the proposed Project. Compliance with applicable policies contained in the County Comprehensive Plan, LUDC, MLUDC, and County Coastal Land Use Plan would ensure avoidance of impacts to archaeological, paleontological, and Native American cultural resources. Furthermore, Section 8 of the County Cultural Resource Guidelines requires that the likelihood of buried archaeological deposits be considered, and Phase I and II archaeological surveys be performed, if necessary. Similar to the proposed Project, under Alternative 2, compliance with existing County policies and guidelines would ensure that the impacts to archaeological resources, tribal cultural resources, human remains, and paleontological resources would be less than significant.

Geology and Soils

Under Alternative 2, impacts to geology and soils could be incrementally more severe than under the Project. Development of cannabis facilities on undeveloped lands may involve vegetation clearing and grading or construction of new cannabis structures with resultant potential for erosion, sedimentation, or slope failure.

Impacts GEO-1 and GEO-2: Cannabis cultivation under Alternative 2 could involve exposure to landslides, erosion, earthquakes, liquefaction, expansive soils, ground failure, or other geologic hazards. Potential geologic impacts related to exposure to unstable earth and unsuitable soil conditions associated with cultivation activities would be mitigated by existing County policies and regulations, such as the Santa Barbara County Comprehensive Plan Seismic Safety and Safety Element, Grading Ordinance, Santa Barbara County Building Code, and the Santa Barbara County LUDC. Although Alternative 2 would involve a smaller potential impact area and would not involve manufacturing and distribution facilities, the relocation of up to 146 acres of exiting cannabis canopy in addition to the potential 730 acres of new cannabis canopy may require grading operations on additional areas of the County compared to the Project to establish new sites. Therefore, this alternative could result in greater impacts associated with geologic hazards in relation to cannabis activity structures. Nonetheless, similar to the Project, compliance with existing County standards and regulations would ensure that impacts associated with geologic hazards would be less than significant.

Hazards and Hazardous Materials

Under Alternative 2, impacts to hazards and hazardous materials could be similar to the Project.

Impact HAZ-1: Similar to the proposed Project, under Alternative 2, impacts may occur from prior use, storage, or discharge of hazardous materials on lands subject to future cannabis activities. Cannabis cultivation, distribution, and manufacturing would be consolidated into a smaller area of the County, primarily on non-Williamson Act agricultural lands, and other commercial and industrial zoned properties, which could increase risks of upset in some areas but reduce risk in others. Cannabis cultivation would be subject to existing laws and regulations governing the cultivation of commercial food products and associated hazardous activities. However, the relocation of up to 146 acres of land dedicated to cannabis activities could result in more scattered operations, operations that are closer to more heavily populated areas, or an increase in unregistered sites. However, since the majority of cannabis cultivation operations are expected to register with the proposed Project, compliance with existing federal, state, and local regulations, proposed development standards, and standard review processes and conditions of the County, would ensure impacts of Alternative 2 would be less than significant.

Impacts HAZ-2: Similar to the Project, impacts from former oil or gas pipelines or well facilities on lands subject to cannabis activities may occur under Alternative 2. Alternative 2 could result in fewer
or greater hazard impacts than the Project, depending on the reduction of cannabis cultivation operations on Williamson Act lands, which would be required to either reduce the extent of their operation or relocate to new eligible site. However, compliance with federal and state regulations, County policies and regulations, and permit review processes would reduce impacts. Therefore, impacts related to hazards and hazardous materials associated with cannabis activities would be similar to the Project and less than significant.

**Impacts HAZ-3:** Similar to the Project, under Alternative 2, impacts may also occur from the use, storage, or distribution of hazardous or toxic materials for cannabis activities, similar to the Project. Despite the federal, state and local regulations to which operators must adhere, volatile components of cannabis processing and manufacturing could still lead to adverse impacts. Therefore, mitigation measures **MM HAZ-3, Volatile Manufacturing Employee Training Plan**, would be required, and impacts would remain less than significant with mitigation.

**Impact HAZ-4:** Alternative 2 may result in impacts from cannabis activities that may be relocated to within high fire hazard areas, exposing people or structures to significant risks involving wildland fires. Cannabis activities would be subject to CalFire defensible space requirements, County Building Code requirements, and County Fire Code regulations to ensure protection of proposed facilities from wildfire hazards. Development plans would also be required to avoid interference with implementation of County emergency and evacuation plans. Therefore, compliance with existing federal, state, and local regulations, proposed development standards, and standard review processes and conditions of the County, would ensure hazard impacts of Alternative 2 would be less than significant.

**Hydrology and Water Quality**

Under Alternative 2, impacts to hydrology and water quality would be similar to the Project. Development of cannabis facilities on undeveloped lands may involve vegetation clearing and grading exposing soils to erosion with potential sedimentation into areas watercourses.

**Impacts HWR-1 and HWR-2:** Under Alternative 2, impacts could occur where the development and operation of cannabis cultivation activities introduce sediment or pollutants into surface runoff or storm water flows that threaten the identified beneficial uses of receiving water bodies. Sediment levels may be increased if up to 146 acres of existing cannabis operations on Williamson Act lands are relocated to new eligible sites. Nonetheless, it is expected that a majority of cannabis cultivation operations would register with the proposed Project, and that compliance with federal, state, and county regulations would minimize most impacts to surface waters. Similar to the Project, Alternative 2 would include project requirements to protect water quality, such as prohibiting cultivation within proximity to streams or within the HWM of a water body. BMPs would be applied through the licensing process on a case-by-case basis to ensure that contaminated surface runoff or groundwater would be avoided or minimized. Impacts from herbicides, pesticides, and rodenticides and the potential for abandoned cultivation sites that could result in the introduction of pollutants into receiving water bodies would require implementation of **MM HWR-1, Cannabis Waste Discharge Requirements Draft General Order** to reduce impacts. Alternative 2 would prohibit all cannabis cultivation activities on Williamson Act lands, which would greatly reduce the lands eligible for cannabis activities within the County, but may result in the relocation of existing cannabis cultivation operations to areas without agricultural infrastructure and more hydraulically sensitive, such as Tepusquet Canyon and the northern Lompoc area. Further, it may increase the amount of unregulated activities, as many cultivators may not be able to relocate to eligible lands. Therefore, the introduction
of sediment or pollutants into surface runoff or storm water flows may be slightly greater than the proposed Project. Similar to surface water quality impacts, compliance with state and local regulations governing water quality, would ensure that cannabis cultivation sites use BMPs that would limit impacts where the aquifers intersect with the ground surface. Expansive cannabis activities in locations that are especially vulnerable to surface pollutants could result in potentially significant impacts. With implementation of MM HWR-1, Cannabis Waste Discharge Requirements Draft General Order, impacts would be less than significant with mitigation and overall similar to the Project.

**Impact HWR-3**: Impacts of cannabis cultivation under Alternative 2 could occur on groundwater supplies and groundwater recharge where the development and operation of licensed cannabis cultivation activities would unsustainably draw groundwater resources or inhibit groundwater recharge. Licensees would be required to demonstrate an adequate and approved water source is available for proposed cultivation via receipt of permission from appropriate agencies or owners of the rights to such water sources prior to issuance of a license, pursuant to the SWRCB water rights and cannabis activity licensing requirements. Further, limits to the availability of water from municipal sources or from groundwater management agencies may limit the licenses if a licensee cannot demonstrate an adequate source of water, including groundwater. Implementation of the modified County standard condition of approval WatCons-01 Water Conservation-Outdoor, MM HWR-3, Water Conservation–Water Efficiency for Cannabis Cultivation would further reduce impacts under Alternative 2 to less than significant with mitigation. Alternative 2 would result in greater impacts than the proposed Project, particularly when cannabis cultivation is directed to non-Williamson Act lands where any increase in groundwater extraction would impact the level of supply available in the aquifers. Higher groundwater impacts may occur in rural areas where there are non-Williamson Act lands, and where there are scarce groundwater supplies, such as Tepusquet Canyon, and overdrafted groundwater basins, including the Goleta, Buellton Uplands, Santa Ynez Uplands, Lompoc, San Antonio, Santa Maria, and Cuyama Groundwater Basins.

**Impact HWR-4 and HWR-6**: Impacts to existing drainage patterns from cannabis cultivation activities under Alternative 2 could occur from site preparation and grading activities. New greenhouses, buildings, or other cannabis-related structures would have the potential to increase concentrated runoff, but this development would be subject to existing County regulation and permitting, which would minimize adverse effects of runoff through adherence to applicable regulations, including the County’s Grading Code. Further, County setbacks from perennial and intermittent or ephemeral streams and from outside the HWM of a waterbody would prohibit cultivation sites from being located within a 100-year floodplain. Because the lands eligible under Alternative 2 are limited and located in more rural areas of the County compared to the Williamson Act lands, impacts related to existing drainage patterns are expected to be slightly greater than the proposed Project. With adherence to design features and applicable regulations that would apply under Alternative 2, the impacts of cannabis cultivation would be considered less than significant.

**Impact HWR-5**: Alternative 2 could result in impacts to surface and groundwater quality, groundwater supplies and groundwater recharge from cannabis testing, manufacturing, distribution, and retail activities. All new cannabis activity operations would be required to be designed and constructed in accordance with state and County codes regulating water efficiency. Additionally, grading required to construct new buildings would occur in accordance with the County’s Grading Ordinance, even for existing cannabis cultivation operations that are relocated to new sites that are not subject to Williamson Act contracts. Further, the County’s licensing process, along with compliance with state and local regulations governing water quality, would ensure that cannabis
cultivation sites use BMPs that would limit impacts where the aquifers intersect with the ground surface and are especially vulnerable to surface pollutants. Because the lands eligible under Alternative 2 are limited and the Alternative would direct cannabis activities to non-Williamson Act lands located in rural areas of the County, impacts related to surface and groundwater quality would be expected to be slightly greater than the proposed Project. However, compliance with existing regulations would ensure surface and groundwater quality impacts are less than significant.

**Land Use and Planning**

Under Alternative 2, impacts to land use and planning could be incrementally more severe than under the Project. Preclusion of cannabis activities from 513,000 acres of Williamson Act lands would redirect cannabis related growth to less agriculturally-developed areas, such as those near urban centers or dispersed near native habitats.

*Impact LU-1*: Impacts to land use would be due to potential conflicts with applicable land use plans, policies, and regulations. Potential inconsistencies between Alternative 2 and the CLUP and the Comprehensive Plan goals and policies may be related to commercial cannabis cultivation facilities connection to public services, as well as policies focused on natural resource protection, water quality, vegetation, hillside protection, and visual resources. Similar to the proposed Project, where lands would be eligible for licenses by zoning that are also public lands under Alternative 2, there is a potential land use consistency issues. Implementation of **MM LU-1, Public Lands Restriction**, would reduce impacts to less than significant with mitigation. Given the program requirements under Alternative 2 are similar to the proposed Project, it would result in similar land use impacts.

*Impact LU-2*: Impacts could occur under Alternative 2 from cannabis cultivation, manufacturing, distribution, and retail sales activities upon existing communities due to traffic, odors, noise, or other quality of life issues. Unlike the proposed Project, commercial cannabis cultivation, manufacturing, and distribution activities would be increased within land outside of Williamson Act contracts, which include an increased amount of AG-I areas closer to residential zoning districts, increasing potential neighborhood compatibility issues or perceived change in quality of life in the areas, particularly in neighborhoods where the AG-I zoning districts abut residential uses (e.g. Carpinteria and Lompoc Valley). While some land use conflicts may decrease in Williamson Act lands near sensitive receptors and nearby residences, the remaining 23 percent of eligible lands in the County, compared to the Project, would experience an increase in the concentration of cannabis activity sites adjacent to existing communities. Nevertheless, because the regulations, restrictions, and development standards under Alternative 2 are the same as the Project, these would regulate commercial cannabis activities and restrict potential neighborhood incompatibility. Similar to the proposed Project, implementation of **MM LU-1, Public Lands Restriction**, would reduce impacts to less than significant with mitigation.

**Noise**

Under Alternative 2, noise impacts would be incrementally greater than the proposed Project.

*Impacts NOI-1 and NOI-2*: Construction and operation of commercial cannabis cultivation, distribution, manufacturing, processing, testing, and retail sales facilities allowed under Alternative 2 would result in short-term increases in noise, but the construction noise increases would be temporary and existing County policies and proposed development standards would minimize short-term and long-term operational noise impacts. However, depending on the cumulative response of existing cannabis cultivation operations on Williamson Act lands, temporary noise impacts may be greater that under the proposed Project as cultivation sites are relocated to new eligible sites,
particularly if the new sites are in closer proximity to more densely populated areas of the County. Additionally, the reduced area of eligibility may intensify noise impacts in certain areas upon buildout and associated traffic, especially if the area is already in exceedance of noise thresholds. Proposed commercial cannabis activity projects would be subject to the policies and standards such as the County’s Comprehensive Plan and Cannabis Land Use Ordinance, discretionary review, and the temporary nature of potential impacts to a given sensitive receptor, would ensure that construction impacts are less than significant. However, while implementation of MM AQ-3, Cannabis Site Transportation Demand Management, would ensure that potentially significant impacts resulting from roadway noise and congestion under long-term Project operations are reduced, similar to the Project, there is no feasible way to ensure vehicle noise increase from Project traffic would not exceed County thresholds, and impacts under Alternative 2 associated with operational noise would remain significant and unavoidable.

Public Services

Under Alternative 2, impacts to public services could be incrementally more severe than under the Project.

Impacts PS-1 and PS-2: Impacts from commercial cannabis cultivation, manufacturing, and distribution activities under Alternative 2 would decrease demand for fire protection, police protection, public schools, parks, libraries, and other public facilities, similar to the proposed Project. Alternative 2 would result in greater fire protection impacts, fewer impacts to police protection services, and greater impacts to parks, schools, libraries, and other public services.

Fire Protection: Because Alternative 2 restricts cannabis activities in the more rural lands under Williamson Act contracts and reduces the amount of eligible land, the potential for population increases in high fire risk zones would also be reduced. Nevertheless, implementation of this alternative could potentially consolidate cannabis sites into other rural high fire risk zones containing eligible zoning districts, such as AG-I and AG-II lands located outside of Williamson Act contracts, which are still located throughout the County. Nevertheless, the dispersion of cannabis-related activities in remote areas under Alternative 2 could redistribute emergency response times and evacuations during wildfires, particularly along narrow rural roads, which are common in rural areas that are not subject to a Williamson Act contract. Compliance with the County Comprehensive Plan goals and policies, County Code, including LUDC, MLUDC, and CZO, among other state requirements, overall risk of fire could be reduced or increased, depending on the cumulative response of existing cannabis cultivation sites located on Williamson Act lands. Nonetheless, compliance with applicable regulations would ensure that impacts would be less than significant.

Police Protection: Cannabis activities in the County under Alternative 2 would have the potential to incrementally increase demand for police and emergency services. The general impacts would be similar to the proposed Project, with increased levels of employment, employee population, and police staffing levels. Because Alternative 2 limits cannabis activities on Williamson Act lands, which is typically further from established residential neighborhoods, potential land use compatibility impacts may increase. In turn, this may increase calls for service related to noise complaints, driving while under the influence, security concerns, and other public transportation safety concerns. As a result, impacts under Alternative 2 would be greater than the proposed Project and would remain less than significant.

Parks, Schools, Libraries and Other Public Services: As under the proposed Project, Alternative 2 would potentially generate additional full-time cultivation employees, which would contribute to
increased demand for housing, as well as the use of parks, schools, libraries, and other public services by the employees’ families. As discussed in Section 3.11, Public Services, a population increase would not represent a substantial increase in demand for these public services, however population increases would occur higher within urbanized areas as concentration of cannabis activities would be directed towards the more urban areas of the County. Ultimately, impacts would remain less than significant, as there are more schools, libraries, and other public services in the urban areas of the County.

**Transportation and Traffic**

Under Alternative 1, impacts to transportation and traffic could be incrementally less severe than under the Project.

*Impact TRA-1:* Similar to the proposed Project, impacts of commercial cannabis cultivation under Alternative 2 could result in increases in traffic and daily vehicle miles of travel affecting the performance of the existing and planned circulation system. For Alternative 2, impacts associated with consistency with transportation plans and programs, traffic increases, and consistency with plans and policies regarding public transit, bicycle, and pedestrian facilities would be significant and unavoidable.

**Consistency with Transportation Plans and Programs**

Although Alternative 2 may result in the development of new sites to accommodate relocated sites from Williamson Act contract sites and potential future licensed activities within agriculturally-designated areas, they would not foreseeably result in substantial changes in land use patterns within the County. Therefore, Alternative 2 is not expected to result in significant changes in existing vehicle fleet patterns or automobile trips, and is considered to be in general conformance with the policies and objectives of local transportation and circulation planning documents and programs. However, like the proposed Project, Alternative 2 has a reasonable potential to result in exceedance of growth projections for the agricultural and manufacturing sectors within the County. As such, employment and population growth and associated vehicle trips and VMT from cannabis activities may exceed forecasted conditions, and would therefore be inconsistent with SBCAG’s RTP/SCS. These impacts under Alternative 2 would be similar to those under the proposed Project.

**Increases in Traffic**

Overall, buildout of the cannabis industry under Alternative 2 would be similar to the Project. Despite projected new traffic volumes, like the proposed Project, Alternative 2 is not anticipated to substantially increase vehicle trips or traffic volumes along any one road or intersection, as proposed cannabis operations would be dispersed across a relatively wide area in the County. These impacts are expected to be incrementally greater under Alternative 2, as trips may be more concentrated throughout the AG-I and AG-II areas not under Williamson Act contract and commercial areas, rather than dispersed within lands in compliance with agricultural operations. Implementation of Alternative 2 is considered to have a potentially significant impact with regard to traffic and with regard to increases in traffic volumes and consistency with the CMP. Implementation of **MM TRA-1, Payment of Transportation Impact Fees** and **MM AQ-3, Cannabis Site Transportation Demand Management**, would be required to reduce impacts to roadways and intersections under the jurisdiction of the County. Traffic impacts under Alternative 2 would be incrementally greater outside of Williamson Act lands, but would be less than significant with the implementation of mitigation measures.
Consistency with Plans or Policies Regarding Public Transit, Bicycle, or Pedestrian Facilities

While Alternative 2 does not include features which would directly affect the performance or safety of transit, bicycle, or pedestrian facilities, it would allow new cannabis uses in existing compatible zoned areas, which may induce employment industry growth, and subsequent demand for such facilities. As Alternative 2 does not include changes in existing land use or zoning patterns, or include new development which directly would physically affect current or proposed transit, bicycle, or pedestrian facilities, Alternative 2, like the proposed Project, is not considered to conflict with applicable plans, policies, or programs for these facilities. As a result, impacts would be less than significant. Impacts under Alternative 2 would be less than the proposed Project, because at a programmatic level this alternative directs cannabis cultivation outside of more rural lands under Williamson Act contracts, which would result in more work trips using alternative modes of transportation, mainly because of increased facilities in urban areas of the County.

Impact TRA-2: Licensed cannabis operations could be located within areas of the County or along roadways currently subject to hazardous road conditions. In particular, Alternative 2 would have the potential to reduce roadway safety or introduce new roadway hazards, such that the County’s adopted significance criteria for traffic and roadway safety are exceeded, particularly within areas with known hazardous roadway conditions, such as the rural winding roads of Tepusquet and SR 192 where existing agricultural operations commonly result in roadway compatibility issues with surrounding urban residential development. Implementation of MM TRA-1, Payment of Transportation Impact Fees, and MM AQ-3, Cannabis Site Transportation Demand Management, would reduce impacts to roadway safety and emergency access, but they would remain significant and unavoidable. These road safety impacts would be slightly less under Alternative 2, as it directs commercial cannabis activities outside of lands under Williamson Act contracts, which are primarily located across the County in rural areas where more narrow and winding roads may be present, when compared to the urban areas of the County.

Utilities and Energy Conservation

Under Alternative 2, impacts to utilities and energy conservation could be similar to the Project.

Impact UE-1: The implementation of Alternative 2 and operation of licensed cannabis sites throughout the County would result in additional new demand for water, wastewater, and solid waste utility services, supplies, and infrastructure. As total water use, wastewater, and solid waste is expected to be similar between Alternative 2 and the proposed Project, the resulting impacts would be similar. However, as cultivation licenses would be consolidated into a smaller area of eligibility focused on AG-II zoning districts outside of Williamson Act contract lands, AG-I, and commercial districts of the County, there is a greater potential for water supply issues related to urbanized area water districts compared to the Project. Cannabis operations sited within a service area of a municipal water provider may need to rely on water districts as the predominant source of water supplies, thereby contributing to municipal and urbanized area water demand. Therefore, impacts on water supply, wastewater services, and existing infrastructure for Alternative 2 would be slightly greater than the proposed Project within more developed areas and reduced in more rural areas, but remain less than significant. Given the agricultural nature of cannabis cultivation, it is not anticipated that Alternative 2, like the proposed Project, would result in substantial new wastewater generation, as cannabis cultivation typically results only in the generation of agricultural runoff from outdoor cultivation sites and the disposal of mineral-nutrient rich water used in hydroponic operations is regulated separately from municipal wastewater. Similarly, Alternative 2 would generate solid waste both during
construction of new cannabis sites and during operation of such facilities, but because operations would comply with federal, state, and local regulations, impacts associated with the disposal of solid waste generated from cannabis activities are considered *less than significant*. Both wastewater and solid waste impacts under Alternative 2 are expected to be similar to the proposed Project.

**Impact UE-2:** Impacts of cultivation, manufacturing, and distribution activities under Alternative 2 would result in additional demand for a significant amount of new energy supplies within the County and may conflict with energy conservation policies. Under Alternative 2, cannabis cultivation would be limited on Williamson Act contract lands, but other eligible areas within the County are located entirely within the PG&E and SCE service territories, and these utilities providers have supplies available to meet existing and future utilities demands. While the Project may have the potential to result in the wasteful or inefficient use of electricity through the operation and powering of facilities and equipment, the implementation of **MM UE-2a, Energy Conservation**, **MM UE-2b, Participation in a Renewable Energy Choice Program**, and **MM UE-2c, Licensing by the County Green Building Committee**, would reduce impacts to *less than significant* with mitigation.

While Alternative 2 may result in additional demand for electricity, this alternative is not anticipated to result in the substantial new demand for natural gas supplies, as natural gas is not typically required as part of cannabis operations. As such, energy impacts related to natural gas usage would be *less than significant*. Similarly, given there would be a foreseeable, but negligible increase in regional and statewide demand and use of vehicle fuels under Alternative 2, this increase is not anticipated to constrain available supplies or result in the wasteful use of such resources to a substantial degree. As a result, energy impacts related to fuels would be *less than significant*. These impacts are anticipated to be similar to the proposed Project.

**Impact UE-3:** Alternative 2 would be consistent with existing energy standards and conservation policies. Under Alternative 2, licensees would be required to submit applications, including detailed site plans that would be subject to discretionary review by the County Planning and Development Department. This review process would ensure that sites proposed for cannabis operations are development in compliance with adopted energy and building standards. Further, license applications would be subject to similar review requirements at the state level, which would ensure further consistency with standards for energy and building design. Therefore, impacts are *less than significant* and anticipated to be similar to the proposed Project.

**Population, Employment, and Housing**

Under Alternative 2, impacts to population, housing, and employment would be similar to the Project.

**Impact PEH-1:** As under the proposed Project, impacts of Alternative 2 could induce population growth from an increase of full-time cultivation employees Countywide. Overall, the expected increase in employment, housing, and populations associated with cannabis-related activities in the County would exceed regional and local growth forecasts for the County, due to increases in employment, population, and housing at a rate that would occur faster than projected growth.

While the increase in housing demand from cannabis industry employees may be substantial, the County maintains programs and policies to ensure adequate provision of housing to meet ongoing demands, particularly when the demand is generated from local industries. It is also likely that many cannabis employees would live at or below the “low income” threshold and may qualify for affordable and/or farmworker housing options. Nevertheless, since the projected employment associated with Alternative 2, as with the proposed Project, is expected to exceed local and regional growth estimates...
under the County Comprehensive Plan and SBCAG’s RTP/SCS, impacts related to population, employment, and housing under the Project are considered. While ongoing implementation of Housing Element programs would provide affordable housing and farmworker housing, and ensure the County provides adequate housing units to meet its housing needs, there are no feasible mitigation measures to ensure housing demand is met by new populations specifically generated from employment in the local cannabis industry. Further, Alternative 2 would limit cannabis activities on Williamson Act lands, which may direct more activities to AG-II lands not under Williamson Act Contracts, AG-I areas not under Williamson Act Contracts, and commercial zoning districts, resulting in an increase of new employee housing demand in more developed areas of the County. Market demand would result in a similar increase of employees under both the Project and Alternative 2, though there would be a reduced area for larger cannabis activity businesses to occur under Alternative 2. Therefore, despite implementation of **MM PEH-1, In Lieu Fees**, impacts associated with population, employment, and housing would be incrementally less than the Project due to a reduced area of eligibility and remain *less than significant with mitigation*.

**Conclusion and Relationship to Project Objectives**

Alternative 2 would not reduce any significant impacts to a less than significant level. This alternative would potentially result in incrementally greater environmental impacts to aesthetics, air quality, agricultural resources, biological resources, cultural resources, geological resources, hazards and hazardous materials, hydrology and water quality, land use, and noise (temporary impacts only), with some urban areas of the County affected more than rural areas, though rural areas not under Williamson Act contract would likely experience intensified adverse impacts compared to the Project. Impacts related to population and housing, public services, and traffic and transportation and circulation would increase, but would be subject to feasible mitigation to be similar to the proposed Project. Further, the classification of all impacts under Alternative 2 would be the same as those under the proposed Project, including significant and unavoidable air quality, population and housing, and transportation impacts.

Site locations within the County on Williamson Act contract lands which continue to engage in cannabis activities, both known and unknown, may be unwilling to enroll in the proposed Project. Such operations would not be subject to licensing criteria requirements, development standards, and regulations associated with licensed facilities could result in continued or increased adverse effects upon the environment, such as sensitive habitats, unregulated volatile manufacturing, water diversions, non-regulated waste water effluent, sedimentation and erosion concerns, greater fire safety and security risks, and degradation of neighborhood quality of life. By not accommodating a substantial proportion of existing and projected demand for commercial cannabis opportunities as represented in the Registry data, Alternative 2 may result in greater environmental impacts than the Project.

Adoption of Alternative 2 would achieve some of the Project objectives which include regulating commercial cannabis cultivation, manufacturing, and distribution activities within the County, providing an efficient and clear cultivation and manufacturing permit process and regulations, and regulating sites and premises to avoid degradation of the visual setting and neighborhood character, odors, hazardous materials, and fire hazards.

However, adoption of Alternative 2 would not achieve many Project objectives, including those related to development of a robust and economically viable legal cannabis industry, encouraging businesses to operate legally and secure a license to operate in full compliance with County and state
regulations, minimization of adverse effects of cultivation and manufacturing and distribution activities on the natural environment, and maximization of the proportion of licensed activities by minimization of unlicensed activities. This alternative would make numerous cultivation sites ineligible that are located on Williamson Act lands, thus not encouraging cannabis cultivators and product manufacturers to operate legally and secure a license to operate in full compliance with County regulations.

### 4.2.4 Alternative 3 – Reduced Registrants Alternative

This alternative considers environmental impacts under a modified set of licensing regulations that would reduce the total number of County licenses issued for cannabis cultivation activities.

Under the Reduced Registrants Alternative (Alternative 3), the total number of licenses issued by the County would consist of half of the number of each category of licenses that were indicated as part of the 2017 Cannabis Registry. This would restrict the County to issuing a total of 962 licenses (50 percent of the 1,924 identified), which would subsequently limit the representative buildout of the Project analyzed in this EIR by a commensurate 50 percent. However, existing operators identified in the 2017 Cannabis Registry would be prioritized for licensing under this alternative, which would substantially reduce the net new buildout, while allowing for limited growth. Under this alternative, the total number of licenses allowed within the County would be distributed as follows:

- Type 1: 88
- Type 2: 109
- Type 3: 191
- Type 4: 135
- Type 5: none
- Type 6: 87
- Type 7: 63
- Type 8: 32
- Type 10: 62
- Type 11: 94
- Type 12: 10

Further, under Alternative 3, the permitted zone district eligibility and permitting requirements would remain the same as what would occur with the proposed Project. (See Figures 2-3 and 2-4.) However, this alternative would impose the following additional licensing restrictions:

- Licenses for outdoor cannabis cultivation (Types 1, 1B, 1C, 2, 2B, 2C, 3, 3B, and 3C) would be restricted to existing agriculturally-developed lands, where existing operations are currently used for agricultural production.
- Greenhouses and similar permanent structures associated with the alternative would be precluded from installing new hard floors that cover soils.
- Licenses for manufacturing, testing, distribution, and retail sale of cannabis and cannabis products would be restricted to premises located within existing permitted structures.
- On agriculturally zoned lands, all manufacturing and distribution facilities would be required to be an ancillary and subordinate use to cannabis cultivation that occurs on the same lot as the manufacturing and/or distribution facilities.

The intent of this alternative is to reduce impacts associated with the full projected buildout and total physical adverse effects of the Project directly related with development. Primarily, this includes impacts resulting from the development, cover, and loss of prime or unique soils on agricultural lands, and total amount of operational development which would result in long-term operational air

December 2017
pollutant and GHG emissions, noise, and traffic. Further, Alternative 3 would reduce the potential for adverse impacts beyond those analyzed in this EIR due to the restrictions on Countywide development and buildout of the cannabis industry.

The above listed restrictions would be implemented through development standards and zoning regulations included under this alternative. Under the Reduced Registrant Alternative, the opportunities for the cannabis industry could be substantially limited in comparison to the proposed Project. As the proposed restrictions of the Reduced Registrant Alternative would limit future cannabis operations to existing cannabis operations, areas that are currently subject to commercial agricultural operations, and developed spaces, rather than allowing for future cannabis operations on all eligible zoned lands, regardless of existing use.

As discussed above, although restrictions could drive some growers into conducting illegal cultivation operations, in areas such as LPNF, places with dense vegetation, or are otherwise readily concealed, the existing industry in the County is primarily that of major agricultural operations (including use of hoop structures and greenhouses). These types of operations are would be unlikely to relocate to illegal areas that are screened or within more rural, removed areas. Instead, it is anticipated that operations which cannot obtain licenses under this reduced opportunity for licensing are more likely to relocate outside of the County to areas with different or reduced regulatory oversight, such as the counties of Mendocino, Calaveras, Monterey, or Humboldt.

Potential Impacts to Resource Areas

Limiting the number of cannabis licenses issued by the County by 50 percent of those indicated in the 2017 Cannabis Registry would substantially reduce overall impacts resulting from physical development when compared to the proposed Project. Reductions in allowable cannabis licensees would limit the total amount of cannabis development in terms of canopy, new structures and associated employment. While these changes would substantially reduce overall impacts, this Alternative would also not fully meet project objectives. Changes in specific impacts are discussed below.

Aesthetics and Visual Resources

Under Alternative 3, impacts to aesthetics and visual resources would be substantially less severe than under the Project.

Impacts AV-1 and AV-2: This alternative would restrict the licensing of cannabis activities to existing agriculturally-developed lands or to developed structures in which the permitting of cannabis operations would not substantially affect the aesthetics of the adjacent or surrounding lands. These restrictions would effectively prohibit the grading, vegetation clearing, and construction on undeveloped and publicly visible slopes which may offer views of aesthetic and visual resources, and be regarded as important visual resources themselves. However, these preclusions would not prohibit the installation or use of agricultural hoop-structures, which may often be perceived as visually displeasing to the surrounding aesthetic of the area, but which are common and characteristic of commercial agricultural operations. Under Alternative 3, there is potential for substantially reduced effects to visual resources due to restrictions to licensing of cannabis activities to existing developed spaces and visually compatible agriculturally-developed lands. In addition, Alternative 3 would still include implementation of MM AV-1a. Screening Requirements. Therefore, impacts to aesthetic and visual resources under the Reduced Registrants Alternative would be considered less than significant.
Agricultural Resources

Under Alternative 3, impacts to agricultural resources would be substantially less severe than under the Project.

Impact AG-1: Under Alternative 3, impacts to agricultural resources would be substantially less than under the proposed Project. The Reduced Registrants Alternative would both limit the number of licenses issued by the County, which would reduce the number of cannabis operations, as well as restrict cannabis activities to existing agriculturally-developed lands and to existing developed structures of the County. In addition, cannabis cultivation activities would be allowed on AG-I and AG-II zoned lands as a compatible use, therefore there would not be in conflict with established uses for agriculturally zoned lands. Therefore, proposed land uses under Alternative 3 would not be incompatible with existing zoning or the Williamson Act and MM AG-1. Cannabis Cultivation Prerequisite to Ancillary Use Licenses would not need to be implemented. As a result, Alternative 3 would result in a less than significant impact.

Impact AG-2: Cannabis cultivation activities under Alternative 3 could impair the production of other agricultural products since cultivation would only be permitted in areas of existing agricultural production, however, given that cultivation demand by Project registrants would be reduced under Alternative 3, impacts from the cultivation of cannabis pursuant to Alternative 3 would not result in substantial conversion of prime farmland, farmland of statewide importance, or unique farmland to non-agricultural use. Similarly, cannabis cultivation is unlikely to lead to 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. Further, restrictions on the development of new greenhouse or similar structures would effectively limit or negate impacts associated with the loss or conversion of agricultural soils from the covering of soils by new developed floors or structures that would occur under the Project, which was identified as having unavoidable and significant impacts. Therefore, impacts to agricultural resources under the Reduced Registrants Alternative would no longer be unavoidable and significant, would be substantially less severe than the Project and are considered less than significant.

Air Quality and Greenhouse Gas Emissions

Under Alternative 3, construction and operational impacts to air quality and associated impacts to greenhouse gas emission would be less severe than under the Project.

Impacts AQ-1 and AQ-4: Impacts would be similar to those discussed in Section 3.3, Air Quality and Greenhouse Gas Emissions, however, emissions would be decreased by approximately 50 percent from the proposed Project. Alternative 3 would limit or restrict the number of future cannabis by roughly half of that analyzed under the proposed Project, and emissions would commensurately be reduced from those described in Section 3.3, Air Quality and Greenhouse Gas Emissions. Reducing all cultivation, manufacturing, and distribution activities by 50 percent under Alternative 3 would lessen pollutant concentrations and objectionable odors on nearby sensitive receptors and residences. However, impacts would still occur. In addition, impacts from cannabis activities under Alternative 3 could be potentially inconsistent with the Energy and Climate Action Plan. While the proposed Project and Alternative 3 both promote an orderly, efficient, and defined licensing and permit process for cannabis activities, this would nevertheless result in growth in the agricultural and manufacturing industry beyond what is forecasted in the Clean Air Plan. As such, implementation of Alternative 3 would be inconsistent with the CAP, and in turn, also with the ECAP. Taken together, although impacts
would be substantially reduced, impacts would remain significant and unavoidable given there is not feasible mitigation to lessen the impact associated with the inconsistencies between the proposed Project, Alternative 3, and the County’s Clean Air Plan, and the Energy and Climate Action Plan.

Impact AQ-2: Air quality impacts of cannabis cultivation, manufacturing, and distribution under Alternative 3 would be reduced by approximately half in terms of construction generated emissions from cannabis activities under the Project. Similar to the Project, short-term construction emissions, which includes PM10 and NOx pollutants associated with cannabis activities are not expected to violate an air quality standard and would be less than significant,

Impact AQ-3: Long-term cannabis activities licensed under Alternative 3 would generate operational and vehicular emissions that would be substantially lower than under the Project, related to increased vehicle trips from employees and customers of new or expanded cannabis activity sites, and from transportation of cannabis products to and from these sites. As in the Project, MM AQ-3, Cannabis Site Transportation Demand Management, would be implemented in Alternative 3 to reduce vehicle travel to and from proposed cannabis sites. Nevertheless, Alternative 3 would limit or restrict the number of future cannabis operations by roughly half of that analyzed under the proposed Project, and emissions would commensurately be reduced from those described in Section 3.3, Air Quality and Greenhouse Gas Emissions. Because implementation of Alternative 3 would continue to result in the generation of employment and growth in the agricultural and manufacturing economic sectors that would conflict with the agricultural growth assumptions in the County’s CAP, Land Use Element Air Quality Supplement, and SBCAG’s ECAP, continued inconsistency with County and regional plans and policies, and impacts related to air quality and GHG emissions under Alternative 3 would be less severe than the Project but remain significant and unavoidable, even with decreased operation emissions.

Impact AQ-5: Impacts from odors and site emissions would occur under Alternative 3, but they would be reduced compared to the proposed Project. Because cultivation would be restricted to existing agriculturally-developed lands, where existing operations are currently used for agricultural production, some areas eligible for cannabis cultivation, manufacturing, and distribution, under the proposed Project would no longer be eligible under Alternative 3. This could reduce potential odors and site emissions that would originate from cannabis activities which may be developed on undeveloped land located near sensitive receptors, a higher concentration of people, and residential neighborhoods. Nevertheless, some cultivation sites may be located within proximity to a sensitive receptor, and similar to the Project, implementation of MM AQ-5, Odor Abatement Plan (OAP), would ensure that impacts under Alternative 3 resulting from potential nuisance odors would be reduced. However, as a high impact analysis, because nuisance odors may be objectionable to some residents and not be substantially reduced due to the mitigation, impacts would remain significant and unavoidable.

Biological Resources

Under Alternative 3, impacts to biological resources would be less severe than under the Project. Lower levels of development and associated land clearing and loss of habitat would be substantially reduced.

Impacts BIO-1 and BIO-2: Alternative 3 would redirect licensed cannabis activities to already developed agricultural areas and existing developed structures. This would effectively eliminate impacts to biological resources, including sensitive plant and wildlife species or habitat, resulting
from development of cannabis facilities on undeveloped lands that may support sensitive biological resources. Similar to the Project, this alternative would implement **MM BIO-1a, Tree Protection Plan**, and **MM BIO-1b, Habitat Protection Plan**, and **MM HWR-1, Cannabis Waste Discharge Requirements Draft General Order** (See Section 3.8, *Hydrology and Water Quality*) to reduce potential habitat modification and disturbance impacts. Adverse impacts to plants or wildlife and their habitat or sensitive natural communities would be substantially less severe than under the Project and less than significant with mitigation under Alternative 3.

*Impact BIO-3:* Impacts under Alternative 3 associated with the movement of any native resident or migratory species would be less than the proposed Project, because the number of available licenses would be reduced by 50 percent and because licensed cannabis activities would only be permitted on already developed agricultural lands and in existing developed structures. In Alternative 3, compliance with County conservation policies and development standards would be required by each licensee applicant, which would reduce potential biological impacts as it does in the Project. Additionally, the implementation of **MM BIO-1b, Habitat Protection Plan**, and **MM BIO-3, Wildlife Movement Plan**, would ensure impacts to native resident or migratory species would be substantially less severe than under the Project and would be reduced to less than significant with mitigation under Alternative 3.

*Impact BIO-4:* Because Alternative 3 would require projects to demonstrate consistency with applicable policies and development standards, and projects would be reviewed on a case-by-case basis, impacts under Alternative 3 would remain similar to the proposed Project related to consistency with adopted local plans, policies, or ordinances oriented towards the protection and conservation of biological resources. With implementation of existing permitting processes and conservation policies and ordinances, as well as implementation of **MM BIO-1a, Tree Protection Plan**, and **MM BIO-1b, Habitat Protection Plan**, impacts associated with compliance with adopted local plans, policies, or ordinances oriented towards the protection and conservation of biological resources would also be considered less than significant with mitigation.

**Cultural Resources**

Under Alternative 3, impacts to cultural resources would be less severe than under the Project.

*Impacts CR-1 and CR-2:* Alternative 3 would restrict cannabis activities to existing developed agricultural lands and developed structures within the County, as well as reduce the total number of future cannabis operations analyzed in this EIR. Implementation of this alternative would significantly reduce potential for discovery of prehistoric or archaeological resources due to limitations on future development. However, if any ground disturbing activities were to occur, the cannabis licensee would be subject to **MM CR-2, Archaeological and paleontological Surveys**, which would ensure compliance with provisions of the County Cultural Resources Guidelines and prevent potential impacts to cultural resources. In addition, implementation of **MM CR-1 (CSMM CulRes-10), Preservation**, would reduce impacts to existing and eligible historic structures while regulatory compliance with existing County policies and guidelines would ensure that the impacts to archaeological resources, tribal cultural resources, human remains, and paleontological resources would be less than significant. Impacts to cultural resources under Alternative 3 would be less severe than the Project and would remain less than significant with mitigation.
Geology and Soils

Under Alternative 3, impacts to geology and soils would be less severe than under the Project. Lower levels of development and associated grading and potential erosion would be substantially reduced.

Impacts GEO-1 and GEO-2: Restriction of cannabis activities to developed lands would reduce or eliminate the amount of vegetation clearing and grading or construction which could result in erosion, sedimentation, or slope failure compared to the Project. In addition, potential geologic impacts related to exposure of unstable earth and unsuitable soil conditions associated with cultivation activities would be mitigated by existing County policies and regulations. Therefore, impacts under Alternative 3 would be substantially less severe than under the Project, and remain less than significant.

Hazards and Hazardous Materials

Under Alternative 3, impacts related to hazards and hazardous materials would be incrementally less severe than under the Project.

Impact HAZ-1: While Alternative 3 would limit and reduce overall development and number of licensed cannabis operations in the County compared to the Project, licensed cannabis activities would continue to have the potential to encounter sites with stored or discharged hazardous materials. Similar to the Project, future cannabis operations would be subject to compliance with existing federal, state, and local regulations, proposed development standards, and standard review processes and conditions of the County, which would ensure impacts are reduced. Therefore, impacts of the Reduced Registrants Alternative related to prior use, storage, or discharge of hazardous materials on lands subject to future cannabis activities are incrementally less than the Project, and remain less than significant.

Impact HAZ-2: Similar to the Project, impacts from former oil or gas pipelines or well facilities on lands subject to cannabis activities may also occur under Alternative 3, despite the substantial reduction in overall development and 50 percent reduction in number of licensed cannabis operations under this alternative. Like the Project, compliance with federal and state regulations, County policies and regulations, and permit review processes would reduce impacts. Therefore, impacts of the Reduced Registrants Alternative related to former oil or gas pipelines or well facilities on lands subject to cannabis activities are incrementally less than the Project, and remain less than significant.

Impact HAZ-3: While Alternative 3 would limit and reduce overall development and number of licensed cannabis operations in the County compared to the Project, licensed cannabis activities would continue to have the potential to engage in hazardous activities such as the use, storage, or distribution of hazardous or toxic materials for cannabis activities. Similar to the proposed Project, future cannabis operations would be subject to compliance with existing federal, state, and local regulations, proposed development standards, and standard review processes and conditions of the County, which would ensure impacts are reduced. In addition, mitigation measure MM HAZ-3, Volatile Manufacturing Employee Training Plan, would be required, 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. This would ensure impacts of the Reduced Registrants Alternative related to use, storage, or distribution of hazardous or toxic materials for cannabis activities are incrementally less than the Project, yet remain less than significant with mitigation.

Impact HAZ-4: While cannabis activities on eligible parcels would be subject to various levels of fire hazards, the level of impacts under Alternative 3 would be less than the proposed Project, due to the
50 percent reduction in available licenses available. Cannabis activities would be subject to CalFire defensible space requirements, County Building Code requirements, and County Fire Code regulations to ensure protection of proposed facilities from wildfire hazards. Therefore, impacts of the Reduced Registrants Alternative related to cannabis activities that may be located within high fire hazard areas, exposing people or structures to significant risks involving wildland fires are incrementally less than the Project, and remain less than significant.

**Hydrology and Water Quality**

Under Alternative 3, impacts to hydrology and water quality would be less severe than under the Project. Lower levels of development, associated grading and potential erosion and sedimentation would be substantially reduced.

*Impacts HWR-1, HWR-2, HWR-3, and HWR-5:* Restriction of cannabis activities to already developed lands under Alternative 3 would limit or eliminate the amount of vegetation clearing and grading exposing soils to erosion with potential sedimentation into watercourses. Similar to the Project, Alternative 3 would include requirements to protect water quality, such as prohibiting cultivation within proximity to streams or within the high water mark (HWM) of a water body. Best Management Practices (BMPs) would be applied through the licensing process on a case-by-case basis to ensure that contaminated surface runoff or groundwater would be avoided or minimized. Impacts from herbicides, pesticides, and rodenticides and the potential for abandoned cultivation sites that could result in the introduction of pollutants into receiving water bodies would require implementation of MM HWR-1, *Cannabis Waste Discharge Requirements Draft General Order*. With this mitigation, the County Planning and Development Department would ensure that impacts from hazardous materials are minimized by reviewing and approving compliance with the requirements of the SWRCB. Impacts to surface water quality under the Reduced Registrants Alternative would therefore be less than the Project, and would remain less than significant with mitigation. Similar to surface water quality impacts, compliance with state and local regulations governing water quality as well as implementation of MM HWR-1, *Cannabis Waste Discharge Requirements Draft General Order*, would ensure that operators of cannabis cultivation sites use BMPs that would limit impacts where the aquifers intersect with the ground surface, and are compliant with the requirements of the SWRCB. Impacts to groundwater quality under the Reduced Registrants Alternative would therefore be less than the Project, and would remain less than significant with mitigation. Under Alternative 3, the total number of licensed operations and buildout assumed under this EIR would be reduced by approximately 50 percent, which would result in a substantial reduction in the amount of water supplies (with particular regard to surface and groundwater), which would result in substantially less severe impacts to the availability of these supplies and associated resources. Implementation of the recommended, modified County standard mitigation measure MM HWR-3, *Water Conservation–Water Efficiency for Cannabis Activities*, would further reduce impacts by ensuring water efficiency is maximized for each cannabis site prior to licensing. Impacts to groundwater supplies and groundwater recharge under the Reduced Registrants Alternative would therefore be substantially less than the Project, and would remain less than significant.

*Impacts HWR-4 and HWR-6:* Due to the restriction of cannabis activities to already developed lands under Alternative 3, the amount of vegetation clearing and grading would essentially be eliminated, and impacts to existing drainage patterns associated with cannabis activities would be substantially reduced compared to under the Project. Impacts to existing drainage patterns under the Reduced Registrants Alternative would therefore be less than the Project, and would remain less than significant.
Land Use and Planning

Under Alternative 3, impacts to land use and planning would be less severe than under the Project as a number of potential inconsistencies with adopted County policy would be reduced or eliminated.

*Impacts LU-1 and LU-2*: Restrictions and limitations on development and cannabis licenses would limit the number of future cannabis operations by approximately 50 percent compared to that analyzed for the Project, and would redirect cannabis activities to agriculturally-developed areas or existing developed structures in or near both rural and urban areas of the County. Regardless, impacts associated with consistency with applicable land use plans, policies, or regulations, and potential adverse effects to existing communities due to increases in traffic, odors, noise, or other quality of life impacts under Alternative 3 would be similar to the Project, in which **MM LU-1, Public Lands Restriction**, would be required to reduce impacts. Impacts associated with land use plans, policies, or regulations consistency would be similar to the Project. Impacts resulting from traffic, odors, noise, or other quality of life issues would be substantially less than the Project due to restriction on the number of cannabis licenses issued by the County. Impacts under the Reduced Registrants Alternative would therefore be less than the Project, and would remain *less than significant with mitigation*.

Noise

Under Alternative 3, impacts to noise would be similar to the proposed Project.

*Impacts NOI-1 and NOI-2*: Restrictions on the number of licenses issued by the County under this alternative would limit the number of future cannabis operations by approximately 50 percent of that analyzed under the Project. This would result in reductions in the amount of short-term construction noise and the number of operations which generate noise from standard operations and vehicular traffic by a commensurate 50 percent due to an approximately 50 percent reduction in the amount of new traffic anticipated under this alternative. However, the potential would continue to exist for new vehicular traffic to increase along road segments such that standard noise levels may be exceeded. Implementation of **MM AQ-3, Cannabis Site Transportation Demand Management**, would reduce impacts resulting from roadway noise and congestion under long-term operations. However, similar to the Project, there is no feasible way to ensure vehicle noise from Project traffic would not exceed County thresholds, and impacts under the Reduced Registrants Alternative associated with operational noise, while substantially less severe than under the Project would remain *significant and unavoidable*.

Public Services

Under Alternative 3, impacts to public services would be less severe than under the Project.

*Impacts PS-1 and PS-2*: Impacts from licensed cannabis activities under Alternative 3 would decrease demand for fire protection, police protection, public schools, parks, libraries, and other public facilities due to a 50 percent reduction in the number of total future licensed operations compared to those analyzed under the Project. Impacts under the Reduced Registrants Alternative would be less than the proposed Project and would remain *less than significant*.

Transportation and Traffic

Under Alternative 3, impacts to transportation and traffic would be incrementally less severe than under the Project.
Impact TRA-1: Limits on the number of licenses issued by the County under Alternative 3 would reduce traffic and daily vehicle miles of travel affecting the performance of existing and planned circulation systems by approximately 50 percent. While increases in traffic would be substantially reduced, impacts associated with consistency with transportation plans and programs, and traffic increases under the Reduced Registrants Alternative would be similar to those under the Project and would remain significant and unavoidable. Impacts associated with consistency with plans and policies regarding public transit, bicycle, and pedestrian facilities under the Reduced Registrants Alternative would be less than those under the Project and would be reduced to less than significant.

Consistency with Transportation Plans and Programs

Like the proposed Project, Alternative 3 has a reasonable potential to result in exceedance of growth projections for the agricultural and manufacturing industries within the County, even though the number of future cannabis operations and associated employment would be reduced by approximately 50 percent. As such, employment and population growth and associated vehicle trips and VMT from cannabis activities would still exceed forecasted conditions, and therefore would be inconsistent with SBCAG’s RTP/SCS. Since no mitigation exists which could ensure consistency with anticipated growth projections, consistency with adopted regional transportation plans and policies, or consistency with basic Project objectives, impacts cannot be avoided. Therefore, these impacts under Alternative 3 are similar to those under the proposed Project, and would remain significant and unavoidable.

While Alternative 3 does not include features which would directly affect the performance or safety of transit, bicycle, or pedestrian facilities, it would allow approximately 50 percent less new cannabis uses than the proposed Project, which would reduce employment industry growth, and subsequent demand for such facilities under this alternative as compared to the Project. As Alternative 3 does not include changes in existing land use or zoning patterns, or new development which would directly affect current or proposed transit, bicycle, or pedestrian facilities, Alternative 3, like the proposed Project, is not considered to conflict with applicable plans, policies, or programs for these facilities. Therefore, these impacts under Alternative 3 would be substantially less severe than those under the proposed Project, and impacts associated with consistency with plans or policies regarding public transit, bicycle, or pedestrian facilities would be reduced to less than significant.

Increases in Traffic

Limits on the number of licenses issued by the County under Alternative 3 would reduce traffic and daily vehicle miles of travel affecting the performance of existing and planned circulation systems by approximately 50 percent. Although these impacts are expected to be less under Alternative 3, as trips may be more dispersed throughout the rural areas of the County, rather than concentrated in urban areas, and agricultural districts, like Carpinteria, implementation of Alternative 3 could still have a potentially significant impact with regard to traffic, traffic volumes, and consistency with the CMP. Implementation of MM TRA-1, Payment of Transportation Impact Fees, and MM AQ-3, Cannabis Site Transportation Demand Management, would be required to reduce impacts to roadways and intersections under the jurisdiction of the County. However, given Alternative 3 could potentially increase traffic volumes such that new traffic would reasonably be dispersed to intersections located outside of the County’s jurisdiction (i.e., Caltrans facilities) that currently and are projected to operate at or near deficient LOS, like the Project, Alternative 3 may contribute towards an exceedance in LOS or exacerbate existing deficient LOS such that impacts would be significant. Therefore, as these facilities are located outside the jurisdiction of the County and cannot feasibly be controlled or
improved through County actions, impacts under Alternative 3 to these facilities are considered similar to the Project’s impacts and remain significant and unavoidable.

**Impact TRA-2:** While Alternative 3 would reduce the amount of cannabis activity by 50 percent, like the Project, licensed cannabis operations could be located within areas of the County or along roadways currently subject to hazardous road conditions. Thus, Alternative 3 would also have the potential to reduce roadway safety or introduce new roadway hazards, such that the County’s adopted significance criteria for traffic and roadway safety are exceeded, particularly within areas with known hazardous roadway conditions, such as the rural winding roads of Tepusquet Canyon, and SR 192 in the Carpinteria Valley where existing agricultural operations commonly result in roadway compatibility issues with surrounding urban residential development. Implementation of **MM TRA-1, Payment of Transportation Impact Fees**, and **MM AQ-3, Cannabis Site Transportation Demand Management**, would reduce impacts to roadways safety and emergency access, but they would remain significant and unavoidable.

**Utilities and Energy Conservation**

Under Alternative 3, impacts to utilities and energy conservation would be substantially less severe than under the Project.

**Impact UE-1:** Restrictions on the number of licenses issued by the County under this alternative would limit the number of future cannabis operations by approximately 50 percent of that analyzed under the Project. This would result in reductions in the number of cannabis operations and associated new demand for water, wastewater, and solid waste utility services, supplies, and infrastructure by an anticipated commensurate 50 percent. Therefore, existing supplies and service could adequately provide service to future cannabis operations, and impacts on water supply, wastewater, and solid waste services, and existing infrastructure for Alternative 3 may be less than the proposed Project, and remain less than significant.

**Impact UE-2:** Restrictions on the number of licenses issued by the County under this alternative would limit the number of future cannabis operations by approximately 50 percent of that analyzed under the Project. While Alternative 3 may result in reductions in the number of cannabis operations and associated new demand for energy resources by an anticipated commensurate 50 percent, to ensure licensed cannabis operations do not result in the inefficient or wasteful use of energy supplies, **MM UE-2a, Energy Conservation Best Management Practices**, **MM UE-2b, Participation in a Renewable Energy Choice Program**, and **MM UE-2c, Licensing by the County Green Building Committee**, would still be required to reduce impacts. Therefore, impacts of the Reduced Registrants Alternative would be substantially less severe than the Project, and would remain less than significant with mitigation.

**Impact UE-3:** Similar to the Project, under Alternative 3, licensees would be required to submit applications, including detailed site plans, if necessary, that would be subject to discretionary review by the County Planning and Development Department and would be subject to similar review requirements at the state level, which would ensure further consistency with standards for energy and building design. Therefore, impacts are anticipated to be similar to the proposed Project and remain less than significant.

**Population, Employment, and Housing**

Under Alternative 3, impacts to population, employment, and housing would be substantially less severe than the Project.
Impact PEH-1: Restrictions on the number of licenses issued by the County under this alternative would limit the number of future cannabis operations and associated employment by approximately 50 percent of those analyzed under the Project. Thus, increases in population and demand for housing as a result of implementation of this alternative would be reduced by a commensurate amount. Implementation of MM PEH-1, In Lieu Fees, would reduce impacts associated with population, employment, and housing, and impacts of the Reduced Registrants Alternative would be substantially less than the Project and less than significant with mitigation.

Conclusion and Relationship to Project Objectives

Alternative 3 would result in substantial reductions in the severity of most impacts compared to the Project, and would reduce significant and unavoidable impacts to agricultural resources to a less than significant level. This alternative would result in similar or less severe impacts to aesthetics and visual resources, air quality and GHG emissions, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, public services, transportation and traffic, utilities and energy conservation, and population, employment, and housing. Classification of some impacts would be reduced from less than significant with mitigation to less than significant for aesthetics and visual resources. For all other resource areas, classification of impacts would remain as described for the Project. Implementation of Alternative 3 would not result in greater or more severe impacts to any environmental resources. Under Alternative 3, significant and unavoidable impacts to air quality and GHG emissions, noise, and transportation and traffic would remain similar to the Project.

Operators of cannabis activities within the County on non-agriculturally developed lands which continue to engage in cannabis activities, both known and unknown, may be unwilling to enroll under the Project. Such operations would not be subject to licensing criteria requirements, development standards, and regulations associated with licensed facilities could result in continued or increased adverse effects upon the environment, such as sensitive habitats, unregulated volatile manufacturing, water diversions, non-regulated waste water effluence, sedimentation and erosion concerns, greater fire safety and security risks, and degradation of neighborhood quality of life. By not accommodating a substantial proportion of existing and projected demand for cannabis opportunities as represented in the Cannabis Registry data, the Reduced Registrants Alternative may result in greater secondary environmental impacts than the Project.

Adoption of Alternative 3 would fail to achieve the majority of Project objectives except those which include regulating commercial cannabis cultivation, manufacturing, and distribution activities within the County, minimizing adverse effects on the natural environment and natural resources, providing an efficient and clear cultivation and manufacturing permit process and regulations, and regulating sites and premises to avoid degradation of the visual setting and neighborhood character, odors, hazardous materials, and fire hazards.

Alternative 3 would not achieve many Project objectives, including those related to development of a robust and economically viable legal cannabis industry, encouraging businesses to operate legally and secure a license to operate in full compliance with County and state regulations, and maximization of the proportion of licensed activities by minimization of unlicensed activities. This alternative would make numerous potential cultivation sites that are not located on existing agriculturally-developed lands ineligible, thus discouraging existing cannabis cultivators and product manufacturers to operate legally and secure a license to operate in full compliance with County regulations.
4.3 Environmentally Superior Alternative

Each alternative analyzed in this section was evaluated based on significance criteria, location, extent and magnitude of impacts, potential benefits, and relative impacts in comparison to other alternatives. The alternative with the fewest adverse impacts is thereby considered the Environmentally Superior Alternative.

The Project and Alternatives 1 and Alternative 2 would result in significant and unavoidable impacts to agricultural resources, air quality, noise, transportation and circulation, and Population, Employment and Housing, and only Alternative 3 would reduce impacts to agricultural resources and Population, Employment, and Housing to a less than significant level. The Project, Alternative 1, Alternative 2, and Alternative 3 all contain fewer significant impacts than the No Project Alternative. As such, the No Project Alternative is eliminated from consideration for the Environmentally Superior Alternative. Compared to the Project, Alternative 1 would generally lessen impacts within the urbanized areas of the County and reduce land use compatibility impacts, though it could create more impacts associated with rural development. However, compared to the Project, Alternative 2 could create more impacts associated with land use compatibility by increasing cannabis activities within urbanized areas, and reducing impacts of potential development on rural agricultural lands. Compared to the project, Alternative 3 would generally result in less severe impacts due to restrictions on cannabis development and the number of licenses issued by the County while substantially reducing the severity of impacts to agricultural resources.

Based on the information in this EIR, Alternative 3 is identified as the Environmentally Superior Alternative. While Alternative 3, would not meet many of the key objectives of the Project, this alternative would give the County the most flexibility and opportunity to bring cannabis operations into compliance with the County Code and the County Comprehensive Plan while minimizing adverse effects to the environment. With implementation of mitigation measures, the Reduced Registrants Alternative provides a balance between meeting Project objectives, including quality of life concerns, and addressing environmental impacts and allowing for limited amounts of growth in the local cannabis industry. However, implementation of Alternative 3, due to its restrictions on development and limitations to eligible areas for cannabis activities, could introduce barriers to participation in the Project and increase unlicensed, unmonitored actions, which are consistently the more severe and environmentally damaging significant and unavoidable impacts identified by the analysis, as found within the No Project Alternative. Additionally, although restrictions could drive some growers into conducting illegal cultivation operations in areas such as the LPNF, places with dense vegetation, or are readily concealed, the existing industry in the County is primarily that of major agricultural operations (including use of hoop structures and greenhouses). These types of operations are unlikely to relocate to illegal areas or within more rural, removed areas. Instead, it is anticipated that these operations which cannot obtain licensing are more likely to relocate outside of the County to areas with different or reduced regulatory oversight, such as the counties of Mendocino, Calaveras, Monterey, or Humboldt.

Given that unregulated cannabis activities currently exist and are likely to continue to exist within the County, secondary impacts, with the exception of aesthetics and visual resources, are considered to result in significant and unavoidable effects on the human and natural environment due to the difficulty of effectively enforcing and regulating such unlicensed operations. Due to the potential for operators to continue to engage in such activities within the County and be precluded from the licensing program, either due to costs of licensing, associated costs of development, or other reasons,
significant and unavoidable impacts are considered to continue to occur, regardless of the Project scenario.
### Table 4-3. Comparison of Impacts of the Project Alternatives

<table>
<thead>
<tr>
<th>Environmental Resource</th>
<th>Proposed Project</th>
<th>No Project Alternative</th>
<th>Alternative 1 — Exclusion of Cannabis Activities from the AG-I Zone District Alternative</th>
<th>Alternative 2 — Williamson Act Preclusion Alternative</th>
<th>Alternative 3 — Reduced Registrants Alternative</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aesthetics and Visual Resources</td>
<td>Less than Significant with Mitigation</td>
<td>Less adverse (Less than Significant)</td>
<td>Similar (Less than Significant with Mitigation)</td>
<td>Similar (Less than Significant with Mitigation)</td>
<td>Less adverse (Less than Significant)</td>
</tr>
<tr>
<td>Agricultural Resources</td>
<td>Significant and Unavoidable</td>
<td>Less adverse (Less than Significant)</td>
<td>Similar (Significant and Unavoidable)</td>
<td>Less adverse (Less than Significant with Mitigation)</td>
<td>Less adverse (Less than Significant)</td>
</tr>
<tr>
<td>Air Quality and Greenhouse Gas Emissions</td>
<td>Significant and Unavoidable</td>
<td>More adverse (Significant and Unavoidable)</td>
<td>Similar (Significant and Unavoidable)</td>
<td>Slightly more adverse (Significant and Unavoidable)</td>
<td>Slightly less adverse (Significant and Unavoidable)</td>
</tr>
<tr>
<td>Biological Resources</td>
<td>Less than Significant with Mitigation</td>
<td>More adverse (Significant and Unavoidable)</td>
<td>Similar (Less than Significant with Mitigation)</td>
<td>Slightly more adverse (Less than Significant with Mitigation)</td>
<td>Less adverse (Less than Significant with Mitigation)</td>
</tr>
<tr>
<td>Cultural Resources</td>
<td>Less than Significant with Mitigation</td>
<td>More adverse (Significant and Unavoidable)</td>
<td>Slightly less adverse (Less than Significant with Mitigation)</td>
<td>Similar (Less than Significant with Mitigation)</td>
<td>Slightly less adverse (Less than Significant with Mitigation)</td>
</tr>
<tr>
<td>Geology and Soils</td>
<td>Less than Significant with Mitigation</td>
<td>More adverse (Significant and Unavoidable)</td>
<td>Similar (Less than Significant with Mitigation)</td>
<td>Slightly more adverse (Less than Significant with Mitigation)</td>
<td>Less adverse (Less than Significant)</td>
</tr>
<tr>
<td>Hazards and Hazardous Materials</td>
<td>Less than Significant with Mitigation</td>
<td>More adverse (Significant and Unavoidable)</td>
<td>Similar (Less than Significant with Mitigation)</td>
<td>Similar (Less than Significant with Mitigation)</td>
<td>Slightly less adverse (Less than Significant with Mitigation)</td>
</tr>
<tr>
<td>Hydrology and Water Quality</td>
<td>Less than Significant with Mitigation</td>
<td>More adverse (Significant and Unavoidable)</td>
<td>Similar (Less than Significant with Mitigation)</td>
<td>Similar (Less than Significant with Mitigation)</td>
<td>Slightly less adverse (Less than Significant with Mitigation)</td>
</tr>
</tbody>
</table>
Table 4-3. Comparison of Impacts of the Project Alternatives (Continued)

<table>
<thead>
<tr>
<th>Environmental Resource</th>
<th>Proposed Project</th>
<th>No Project Alternative</th>
<th>Alternative 1 — Exclusion of Cannabis Activities from the AG-I Zone District Alternative</th>
<th>Alternative 2 — Williamson Act Preclusion Alternative</th>
<th>Alternative 3 — Reduced Registrants Alternative</th>
</tr>
</thead>
<tbody>
<tr>
<td>Land Use and Planning</td>
<td>Less than Significant with Mitigation</td>
<td>More adverse (Significant and Unavoidable)</td>
<td>Slightly less adverse (Less than Significant with Mitigation)</td>
<td>Slightly more adverse (Less than Significant with Mitigation)</td>
<td>Slightly less adverse (Less than Significant with Mitigation)</td>
</tr>
<tr>
<td>Noise</td>
<td>Significant and Unavoidable</td>
<td>Slightly less adverse (Significant and Unavoidable)</td>
<td>Similar (Significant and Unavoidable)</td>
<td>Slightly more adverse (Significant and Unavoidable)</td>
<td>Similar (Significant and Unavoidable)</td>
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<tr>
<td>Public Services</td>
<td>Less than Significant</td>
<td>More adverse (Significant and Unavoidable)</td>
<td>Slightly more adverse (Less than Significant)</td>
<td>Slightly more adverse (Less than Significant)</td>
<td>Slightly less adverse (Less than Significant)</td>
</tr>
<tr>
<td>Transportation and Circulation</td>
<td>Significant and Unavoidable</td>
<td>Similar (Significant and Unavoidable)</td>
<td>Slightly more adverse (Significant and Unavoidable)</td>
<td>Slightly less adverse (Significant and Unavoidable)</td>
<td>Slightly less adverse (Significant and Unavoidable)</td>
</tr>
<tr>
<td>Utilities and Energy Conservation</td>
<td>Less than Significant with Mitigation</td>
<td>More adverse (Significant and Unavoidable)</td>
<td>Similar (Significant and Unavoidable)</td>
<td>Similar (Significant and Unavoidable)</td>
<td>Less adverse (Less than Significant with Mitigation)</td>
</tr>
<tr>
<td>Population, Employment, and Housing</td>
<td>Less than Significant with Mitigation</td>
<td>Less adverse (Less than Significant)</td>
<td>Similar (Less than Significant with Mitigation)</td>
<td>Similar (Less than Significant with Mitigation)</td>
<td>Less adverse (Less than Significant with Mitigation)</td>
</tr>
<tr>
<td>Reduce Significant and Unavoidable Impacts?</td>
<td>--</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
</tr>
</tbody>
</table>