

# CITY of CARPINTERIA, CALIFORNIA



October 8, 2018

California Coastal Commission  
Dayna Bochco, Chair  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105

Coastal Commissioners (By Email)

Re: City of Carpinteria – Addendum to Oct. 5 Comment Letter  
Item # W17c - Oct. 10, 2018 Commission Hearing  
County of Santa Barbara LCPA No. LCP-4-STB-18-0039-1-Part C  
Cannabis Regulations

Dear Chair Bochco and Honorable Commissioners:

After the City of Carpinteria (“City”) submitted its October 5<sup>th</sup> comment letter, an additional issue came to the City’s attention that must be addressed. We apologize for submitting this letter past the deadline, but request that the Commission consider this comment nevertheless due to the importance of the topic.

The City was recently made aware that it is unclear whether the prohibition on “outdoor cultivation” within one mile of the Urban Rural boundary that is being proposed by Coastal Commission staff includes outdoor nurseries. Nurseries fit within the definition of “cultivation,” which is defined as “any activity involving the planting [or] growing...” of cannabis. (Sec. 35-58, “Definitions,” (d).) But, at several points in Santa Barbara County’s proposed Coastal Zoning Ordinance (“CZO”), “Cultivation” and “Nursery” are listed as separate allowed uses, indicating that a nursery could be considered a separate use from cultivation (See, e.g., Secs. 35-68.3(12), 35-69.3(14), 35-84.4(20), 35-144U(B)(4), Table of Uses.) If a nursery were considered a different use, the County would have the authority to determine that the prohibition on “outdoor cultivation” does not include outdoor nurseries.

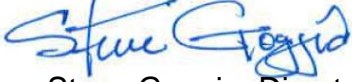
The City is concerned that such an interpretation could lead to negative impacts to the Coastal Zone in the Carpinteria Valley that were not adequately considered. Outdoor growing of any kind has the potential to cause a number of serious impacts to coastal areas, including offensive odors, noise and light pollution, and traffic. There is no evidence included in the Commission’s materials demonstrating that outdoor nurseries would not have the same impacts as outdoor cultivation.

**Therefore, the City requests that, as part of its action, the Commission clarify that all forms of outdoor growing, including nurseries, are subject to the prohibition on outdoor**

**cultivation.** This could be done by inserting clarifying language to this effect in staff's proposed Section 35-144U(D)(1)(a).

Thank you for considering this additional comment.

Sincerely,



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