

# CITY of CARPINTERIA, CALIFORNIA



August 10, 2017

Attention Ms. Jessica Metzger  
County of Santa Barbara Planning and Development Department  
Long Range Planning Division  
123 East Anapamu Street  
Santa Barbara, CA 93101-2058

Re: Notice of Preparation and Scoping of an Environmental Impact Report  
Cannabis Land Use Ordinance and Licensing Program EIR  
Case No. 17ORD-00000-00004

Dear Ms. Metzger:

Thank you for the opportunity to comment on the County's Notice of Preparation (NOP) for the Draft Environmental Impact Report (EIR) for the Cannabis Land Use Ordinance and Licensing Program. As described in the scoping document, the project under consideration is the adoption of a cannabis ordinance that would allow commercial cannabis cultivation, manufacturing/processing with non-volatile and volatile extraction, post-processing and packaging, testing, distribution and retail. The Draft EIR will describe the nature of these different aspects of commercial cannabis operations, identify the potential environmental impacts of uses, and identify alternatives and/or mitigation measures to address these impacts.

The City has reviewed and is generally in agreement with the issues and potential impacts identified in the County's Environmental Scoping Document. This includes the general topics of Aesthetics and Visual Resources, Agricultural Resources, Air Quality and Greenhouse Gas (GHG) Emissions, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Public Safety, Hydrology and Water Resources, Land Use and Planning, Noise, Public Services, Transportation and Circulation, and Public Utilities.

Due to the City's immediate adjacency to extensive agriculturally designated lands in the unincorporated area of the County, natural resources in the City and its residents, visitors and businesses, may be uniquely affected by any impacts resulting from expanded cannabis-related operations in the Carpinteria Valley. According to the County's recent voluntary registry effort, almost one quarter (52) of the 216 self-reported current cultivators countywide are located in the Carpinteria Valley. Of these 52 cultivators, it is not known how many are operating in a manner consistent with current law at the local and/or state levels. Furthermore, the number of self-registered cultivators located in the Valley underscores the desirability of the greenhouse and open field agricultural lands in the Carpinteria Valley for commercial cannabis operations. It is expected that many of the 506 self-registered "future cultivators" throughout Santa Barbara County are also looking at additional sites in the Carpinteria Valley.

The City has reviewed the County's Draft Cannabis Land Use Ordinance dated July 12, 2017. Comments herein identify issues, potential impacts, possible alternatives and/or mitigation measures that are germane to the City's statutory authority and are aimed at assuring that the project (i.e., Ordinance) and its potential impacts to the physical environment affecting the City are understood and properly disclosed. The City believes this is a project of area-wide significance and is responding in the belief that the project could affect residents, businesses, natural resources and public facilities within its jurisdiction.

This comment letter is provided for the limited purpose of assisting the County in scoping the project EIR. The City anticipates providing comments at the appropriate time on the various elements of the draft regulations applicable to the Carpinteria Valley including but not limited to what cannabis uses and activities are allowed, where certain uses are allowed, and development and operating standards.

### **Land Use and Agricultural Resources**

**Issue L1:** As part of the EIR for the pending Cannabis Land Use Ordinance, the County should consider the consistency of the project with the County's Carpinteria Valley Greenhouse Program (Program) and resultant Carpinteria Agricultural Overlay District, and the potential for any new cannabis regulations to encourage or promote further conversion of open field agricultural lands to greenhouse facilities in the context of the Program regulations. The adopted Program included a numerical cap on the total amount of permissible new greenhouses and greenhouse-related development (including packing and shipping facilities and hoop structures) in Area "A" of the Overlay District. The City is not aware of any available, current figures concerning the remaining acreage capacity for new greenhouse development in this Area. Furthermore, and as discussed throughout this letter, the City is generally concerned with the land use and environmental effects of any additional greenhouse development in the Carpinteria Valley. The proliferation of greenhouses and greenhouse-related development in the Valley has led to a continued industrialization of Carpinteria Valley agricultural lands. The City believes further development of such uses and facilities in the Carpinteria Valley is inappropriate and inconsistent with the intent of Agricultural land use designations in the Coastal Zone.

By way of background, in 2004, the County Board of Supervisors (BOS) finalized their adoption and incorporation of amendments to Article II of Chapter 35 of the Santa Barbara County Code to address the outcomes and findings of the Carpinteria Valley Greenhouse Program (Program), including the establishment of the Carpinteria Agricultural Overlay District. The purpose of the program was to identify, limit (through regulation) and mitigate the potential impacts to coastal resources in the Carpinteria Valley resulting from future cumulative greenhouse development. The City of Carpinteria worked closely with the County, providing feedback and comments on the Program throughout the adoption process, to address concerns over continued greenhouse development germane to the City.

The City of Carpinteria General Plan/Coastal Plan, certified in 2003, also includes a number of Objectives and Policies (i.e., Objective LU-4 and Policies LU-4a, -4b and -4c) meant to ensure that development patterns in the unincorporated Carpinteria Valley are supportive of the Coastal Act and City objectives to

preserve unique coastal resources by maintaining open field agricultural uses as the predominant use in the unincorporated Valley.

**Alternatives/Mitigation:** References in the Land Use and Development Code use tables should include a reference to compliance with the applicable provisions of the Carpinteria Agricultural Overlay District for any new cannabis operations contemplated in the Carpinteria Valley. If necessary, license or acreage caps could be considered to limit the proliferation of indoor/greenhouse cannabis operations in the Valley and/or to preserve available capacity for other non-cannabis agricultural uses.

**Issue L2:** The County's Draft Cannabis Land Use Ordinance dated July 12, 2017, contemplates allowing cannabis cultivation (Types 1-4) and non-volatile manufacturing (Type 6) in both the AG-I and AG-II zone districts, as well as volatile manufacturing (Type 7) in the AG-II zone district. The EIR should describe the nature of, intensity and processes involved in both types of cannabis-related manufacturing and compare these activities to the types and intensities of agricultural processing currently allowed in the AG-I and AG-II zones for "traditional" agricultural products. Those differences should be discussed in terms of intensity of uses (employment, traffic trips, etc.) and risks to public health, safety, and natural resources. Risks associated with allowing volatile manufacturing in areas of moderate or high fire hazards should be especially carefully considered and evaluated in coordination with fire protection agencies.

**Alternatives/Mitigation:** Alternatives considered should include further restricting or prohibiting where and/or to what extent manufacturing (Types 6/7) is permitted to occur, particularly in areas where manufacturing is determined to be inconsistent with current policies for preserving agriculture. Mitigation to be considered could include siting manufacturing facilities in areas that do not pose significant safety risks to surrounding land uses or wildlands, requiring the incorporation of additional safety measures (e.g., fire sprinkler systems, spill containment response plans, etc.) in all manufacturing facilities to minimize risk of accidents, fires, or spills, and requiring individual permitting/coordination of such facilities with applicable fire protection agencies (in the case of the Carpinteria Valley, this is primarily the Carpinteria-Summerland Fire Protection District).

**Issue L3:** The County's Draft Ordinance does not specify whether cannabis manufacturing/processing would be limited to on-premise products only, or whether off-premise product manufacturing/processing would also be allowed. We note that presently for other non-cannabis agricultural processing, only the processing of on-premise products are a permitted use in the AG-I and AG-II zones, with production of off-premise products being a conditionally permitted use only in the AG-II zone district. The EIR being prepared for the Cannabis Land Use Ordinance should identify and evaluate the potential environmental effects of allowing cannabis manufacturing/processing of off-premise products within the AG-I and AG-II zones. Specifically, the City is concerned with increased employee vehicle and/or truck traffic associated with deliveries to/from such facilities and the potential for the increased industrialization of activities occurring within Agriculturally-designated areas in the Coastal Zone.

**Alternatives/Mitigation:** Alternatives considered should include limiting cannabis production/manufacturing to on-premise products (only) in both the AG-I and AG-II zone districts (if

manufacturing/processing is to be allowed at all (see Issue L2 above). Such alternatives would help to discourage the likelihood of large scale “industrialized” cannabis operations in or among the smaller AG-I and AG-II designated parcels found in the Carpinteria Valley. Mitigation measures that limit the extent, number or location of such manufacturing/production facilities could also be considered.

**Issue L4:** The EIR Scoping Document prepared by the County did not identify possible effects to the CEQA issues of population and housing as an anticipated area of study. We believe that the potential for the project to result in socio-economic changes to the nature or intensity of agricultural employment, and/or agricultural employee housing demands must be analyzed and discussed in the EIR. The EIR must consider the employment demands generated by cannabis operations in comparison to other agricultural uses currently being practiced in the County (and specifically in the Carpinteria Valley), and the distribution of residency of employees for cannabis operations compared to other agricultural uses. Again, in light of the City’s immediate adjacency to extensive agricultural lands under the County’s jurisdiction and the City historically serving as a primary source of housing for many individuals employed in the Carpinteria Valley’s agricultural industries, the City is especially exposed to the potential impacts of any intensification of employment demands related to new or expanded commercial/medical cannabis operations.

**Alternatives/Mitigation:** Alternatives that are based upon the available potential work force, housing costs in the area, commute distances from affordable housing, etc. should be considered. If increased availability of housing affordable to the work force is anticipated, the availability of suitably designated and located land in the County should be identified. Possible mitigation measures to consider include revisiting allowances for agricultural employee housing in the AG zone districts, and/or implementing a Development Impact Fee or In-Lieu fee program to set aside funds for additional affordable housing for increased agricultural employees resulting from any intensification of agricultural operations over existing conditions as a result of the considered Ordinance.

**Issue L5:** The EIR should consider the potential for expanded cannabis operations to support or encourage the growth of ancillary, supporting or complementary uses, including but not limited to tourism-based operations (e.g., tours, “tastings,” “cannabis clubs,” “farm stays,” etc.). Potential land use, traffic circulation, public safety, and environmental effects of such uses, including where, or if, such uses would be permitted, should be discussed evaluated.

**Alternatives/Mitigation:** If allowed at all, potential mitigation could include limiting where, when and at what level of intensity such uses are permitted. Licensing/permitting of such uses should be required with coordination through appropriate municipal and/or public safety agencies.

**Issue L6:** Numerous nuisance complaints related to odor, light and noise have been brought to both the City and County resulting from the impacts of existing cannabis operations in the unincorporated Carpinteria Valley occurring in close proximity to sensitive receptors located within the City of Carpinteria, including but not limited to schools, youth centers/daycares and residences. Further expansion and intensification of cannabis operations in the Carpinteria Valley has the potential to exacerbate the inherent conflicts between these land uses.

**Alternatives/Mitigation:** As discussed elsewhere in this letter, mitigation measures to be considered should include mandatory buffers or setbacks from nearby sensitive receptors, numeric caps on licenses issued within a defined geographic area, and other physical development standards or required improvements (e.g., odor controls, etc.) for permitted premises to address and abate nuisance impacts.

**Issue L7:** The EIR should consider if and how cannabis operations would utilize the unique characteristics of agricultural land in Coastal Zone (e.g., soils, climate), and if and how the products produced are uniquely suited to the characteristics of the Coastal Zone or whether they succeed similarly in non-coastal areas when grown under similar conditions. The comparative costs of producing in the Coastal Zone versus other areas where the same products could be grown/produced should also be considered.

**Alternatives/Mitigation:** Mitigation considered should include means of assuring the availability of agricultural lands in the Coastal Zone for the growing of products that require the area's unique attributes.

**Issue L8:** While not specifically a CEQA issue, we do note that the County's urgency ordinance prohibiting all non-medical cannabis operations in unincorporated Santa Barbara County will expire in April, 2019, however, the County's timeline for the adoption of the Cannabis Land Use Ordinance (as presented at the July 11, 2017 Board of Supervisors hearing) suggests certification of a Local Coastal Plan Amendment (LCPA) to incorporate cannabis regulations into the County's Article II Coastal Zoning Ordinance may not be considered by the California Coastal Commission (CCC) until May 2019 (or later, depending upon scheduling, among other variables). Post-certification work efforts associated with the final implementation of the Ordinance within the Coastal Zone (e.g., returning the approved LCPA to the County BOS for acceptance, CCC acknowledgement of County acceptance of CCC action, etc.) would further delay the Ordinance from immediately taking effect.

In light of this potential timing gap between when the current urgency ordinance expires and when the Cannabis Land Use Ordinance would take effect in the Coastal Zone, what is the County's strategy for addressing and regulating existing cannabis operations and prospective new operators in areas located within the Coastal Zone during the period when no local regulations would otherwise be in effect? Of particular concern to the City are operations that are ongoing yet are subject to little, if any, regulation and generate complaints from residents and members of the public due to nuisances (e.g., odor, light, etc.). What is the status of enforcement efforts and what will be the County's enforcement strategy should the development and approval of regulations extend beyond the anticipated timeline?

### **Traffic & Circulation**

**Issue T1:** Access to greenhouse and open field agricultural lands in the Carpinteria Valley from U.S. 101 is provided by local arterial and collector streets that pass through the City of Carpinteria, including Casitas Pass Road, Linden Avenue, Santa Monica Road and Cravens Lane. Existing agricultural uses in the Valley impact City streets and intersections through increased traffic, as well as the unique impacts associated with heavy truck traffic, such as damage/wear on local roads, and the inadequacy of some intersections and driveways to accommodate heavy truck turning movements. These concerns also

apply to State Route 192, which passes through the Carpinteria Valley and the City of Carpinteria. Changes in the intensity or nature of vehicle trips associated with existing agricultural uses as a result of expanded Cannabis cultivation and production must be considered.

**Alternatives/Mitigation:** Mitigation could include operational measures such as excluding truck traffic from certain streets where conditions merit and/or limiting new vehicle trips during peak hours or similar methods. The County could also consider the establishment of a Development Impact Fee program to assess intensified uses for their incremental share of roadway and infrastructure improvements necessary to meet increased demands. We note the County previously established a similar program as part of the Carpinteria Valley Greenhouse Program to mitigate identified traffic impacts to the Santa Monica Road/Via Real/U.S. 101 intersection associated with future greenhouse development.

The potential for road/intersection repairs or improvements, addition of bike or walking paths, improving site distances at driveways and intersections, and ensuring adequate loading and parking facilities are provided onsite for cannabis operations should also be considered. If expanded cannabis operations would result in increased heavy truck traffic for concentrated areas, an assessment should be completed that determines whether or not local streets in the affected area are constructed adequately to accommodate increased truck traffic. Mitigation that would offset the proportionate share of damage done to local streets by traffic associated with increased, concentrated cannabis cultivation/manufacturing operations should be considered.

**Issue T2:** Assessing the potential impacts related to traffic and circulation will depend greatly on an understanding of the number of employees required for the expected number of cannabis operations and from where they will be coming. A study of the expected cumulative employment generation, where affordable housing for the work force is located and by what means and routes employees will commute to work must be completed in order to assess potential project impacts and provide adequate mitigation.

**Alternatives/Mitigation:** If warranted, mitigation considered could include methods for reducing vehicle trips (e.g., carpooling, bicycle lanes, etc.) and the establishment of housing affordable to the work force convenient to, or within, the project area(s).

**Issue T3:** In areas where expanded, concentrated cannabis operations are expected to occur (like in the Carpinteria Valley), a significant intensification in the number of agricultural employees associated with cannabis operations could impact the need for public transportation in the area. The EIR should include an assessment of the public transportation available, how it would be impacted and whether or not existing locations/routes would adequately support increased demand in these areas.

**Alternatives/Mitigation:** If warranted, mitigation could include cooperation with municipal transportation providers in the area to determine projected usage by agricultural employees and to determine if alterations in schedules and/or routes is necessary or possible. Similarly, the expansion or improvement of existing bicycle lanes along primary commute routes to/from affected agricultural lands could be considered.

## **Visual Resources & Blight**

**Issue V1:** Lighting impacts from indoor and outdoor cannabis operations associated with both cultivation/production operations and site security measures must be considered and evaluated. Specifically, the City is concerned with cumulative impacts to the Carpinteria Valley night sky such that visibility and aesthetics in the area would be diminished, as well as nuisance impacts to other surrounding land uses (e.g., residences) in close proximity to such uses.

**Alternatives/Mitigation:** Mitigation that could be considered includes the use of roll-down covers or similar physical means of preventing light leakage or spillover from cultivation operations. Night sky friendly, hooded lighting that does not result in spillover onto adjacent properties should be required for all security and property lighting.

**Issue V2:** As noted above under “Land Use and Agricultural Resources” Issues, the City is concerned with the potential for the contemplated cannabis regulations to encourage or foster further growth and expansion of greenhouse and manufacturing/production facilities within the Carpinteria Valley and the impacts this would have on the visual character of the Valley. The proliferation of such facilities contributes to an increasing industrialized character of agricultural lands in the Valley. Furthermore, a general lack of adequate screening, setbacks and/or buffering of such uses from adjacent residential land uses and from nearby public roads throughout the Carpinteria Valley further degrades the visual quality of the area and contributes to a blighting effect upon the area.

**Issue V3:** The aesthetic impacts of the increased securitization of agricultural lands (e.g., large imposing fencing/gates, use of razor wire or similar physical deterrents, armed security, surveillance equipment, additional lighting, etc.) resulting from cannabis cultivation and manufacturing facilities should be considered and evaluated. Again, a proliferation of such infrastructure may contribute to a blighting effect and an increasingly industrialized character of the Carpinteria Valley that is not in keeping with the largely rural nature of the Valley, which has been identified for protection in both the County’s and City’s LCPs.

**Issue V4:** Aesthetic and quality of life impacts on adjacent land uses as a result of any increased industrialization and/or securitization of rural agricultural lands, and the impacts such changes would have on property values should be considered and addressed.

**Alternatives/Mitigation:** Mitigation should be considered that would result in the creation of development standards that take into account aesthetic treatments of new cannabis operations and any needed security improvements, and may include required setbacks, screening, landscaping or similar buffering elements from adjacent uses and public spaces (including roads) with the intent of preserving the existing rural character of the area. Additionally, exterior security lighting should be required to be limited to the minimum necessary for safety purposes and designed to be “night-sky” compliant.

**Issue V5:** Improvement requirements made by the County are often not implemented through approved development or are not properly maintained so as to be effective. Unpermitted improvements are also often not observed or abated for extended periods. Enforcement of

development standards and other zoning requirements has been lax allowing necessary and required improvements to be ignored and unpermitted uses to occur, which further impacts the visual quality of the Valley.

**Alternatives/Mitigation:** Mitigation should be considered that would result in Code Enforcement officer(s) being dedicated to actively regulating and monitoring cannabis operations through the County. Public notifications, including mailed notices to nearby surrounding neighbors, concerning new or expanded licenses would help to inform concerned neighbors of pending operations and provide an opportunity for affected neighbors to share their input. Mandatory recurring inspections as part of ongoing licensing requirements (including renewals) would also help to ensure ongoing permit compliance. This would ensure a greater level of compliance at the construction stage, maintenance of required improvements over the long term, and responsiveness to citizen inquiries/concerns.

### **Air Quality/Odors**

**Issue AQ1:** The EIR should describe and evaluate any public health effects from exposure of persons to odors or airborne particulates associated with the contemplated types of cannabis operations (e.g., cultivation, manufacturing/processing, etc.). This analysis should include a discussion of impacts to persons that have particular sensitivity or allergies to the types of organic and chemical compounds inherent to the uses and activities contemplated by the regulations.

**Alternatives/Mitigation:** If appropriate, mitigation could include mandatory buffers from sensitive receptors, including residences, and/or limiting such activities to indoor, enclosed operations that are outfitted with appropriate air filtering/scrubbing technologies.

**Issue AQ 2:** Intensification or expansion of indoor cannabis cultivation/manufacturing uses in the Carpinteria Valley has the potential to further impact air quality in the area, both from point sources (such as emissions from new large cultivation/production/manufacturing facilities) and non-point sources (e.g., increased vehicle and large truck trips). As stated previously, it will be important to consider cumulative impacts from new construction and employment generation, including the resultant impacts to housing demand (and location), vehicle trips/circulation, etc.

**Alternatives/Mitigation:** Mitigation measures considered should include design measures to reduce GHG emissions associated with point sources and means for reducing the number and distance of vehicle trips traveled in association with cannabis operations. If warranted in specific areas, intersection and/or street improvements that are capable of reducing congestion could also be considered.

**Issue AQ3:** Complaints concerning nuisance odors from cannabis operations occurring in unincorporated areas of the County in proximity to sensitive receptors such as schools, youth centers/day cares and residences located within the City of Carpinteria have increased significantly over the last couple of years. Residents complain that the odor is objectionable, degrades their quality of life and may pose health risks. Nuisance impacts related to the unique odor characteristics of cannabis operations must be considered and addressed.



**Alternative/Mitigation:** Mitigation considered should include recognition that certain aspects of cannabis operations should not occur within certain distances of sensitive receptors, including residential uses. Incorporation of air scrubbing technologies on cannabis operations must be considered to help mitigate nuisance odor complaints.

**Issue AQ3:** The EIR should evaluate if, or how, pesticide, fertilizer or chemical usage (including for both volatile and non-volatile manufacturing) associated with the cannabis industry differs from that of existing agricultural operations, particularly in areas where such agricultural uses occur in close proximity to other land use types. Impacts related to odor from, and exposure to, such materials must be addressed.

**Alternatives/Mitigation:** Mitigation considered should include ensuring ongoing compliance with application standards and operating procedures as managed through the Agricultural Commissioner's office. If necessary, appropriate buffers from nearby surrounding sensitive receptors could also be considered.

### **Noise**

**Issue N1:** Nuisance noise from fans, ventilation systems and other operating characteristics of cannabis industry for nearby sensitive receptors, including residential land uses in City, must be addressed and evaluated. Like odor and lighting, noise complaints have seen a recent increase among residential areas in close proximity to existing cannabis operations in the Carpinteria Valley.

**Alternatives/Mitigation:** Mitigation considered should include recognition that certain aspects of cannabis operations should not occur within certain distances of sensitive receptors, including residential uses, and/or during certain hours that are likely to disturb residents or other sensitive receptors. Appropriate development standards should be established and enforced.

### **Public Facilities & Services**

**Issue PF1:** The EIR should describe and evaluate potential impacts to law enforcement service demands associated with the various aspects of commercial cannabis activities. The potential for the cash basis of the cannabis industry to lead to an increase in crime, including the potential for an increased incidence of crime in areas adjacent to commercial cannabis activities (i.e., robberies, burglaries, weapons possession, etc.) should be investigated/analyzed in the EIR.

**Alternatives/Mitigation:** Possible alternatives to be considered include physically limiting the number or geographic extent of the various types of commercial cannabis activities so as to not create an overconcentration of such uses. Any such alternative should consider the cumulative impacts of the concentration of commercial cannabis activities with other "traditional" blighting uses (e.g., bars, liquor stores, pawn shops, adult-oriented businesses, etc.). Potential mitigation measures to be considered should include additional law enforcement personnel to serve affected areas, minimum requirements, certifications, licenses and inspections for individual cannabis operations and their employees, minimum buffers/separation requirements from other blighting uses and/or exploring options for establishing and

requiring participation of commercial cannabis operations in safer alternatives to an “all-cash” operation.

**Issue PF2:** Potential increased demands for fire protection services associated with the contemplated cannabis operations relative to existing agricultural activities should be described and evaluated. In particular, any potential increased risks of fire, spills, and accidents associated with cultivation and manufacturing activities should be evaluated. We note that much of the Carpinteria Valley is located in or near moderate and/or high fire hazard areas. The appropriateness and risks associated with, for example, volatile manufacturing in such areas, should be carefully evaluated and reviewed with proper fire protection authorities. The potential for any increased incidence of traffic accidents associated with the various aspects of commercial cannabis activities should also be described and evaluated.

**Alternatives/Mitigation:** Alternatives considered could include prohibition or further limitations (e.g., license number caps, size thresholds, etc.) on where particularly high risk activities associated with commercial cannabis are permitted to occur. Mitigation measures considered could include use of development standards to buffer or separate uses from adjacent at risk land uses/resources, requiring mandatory incorporation of appropriate safety measures/technologies, and/or establishing a fee program or similar to require new/intensified uses to pay an incremental share toward additional fire safety personnel, equipment and/or facilities to serve affected areas.

**Issue PF3:** Differences in water use and demand relative to traditional agricultural crops grown in the County and in specific sub-areas like the Carpinteria Valley, should be described and evaluated. This should include demands on both municipally-provided water (like the Carpinteria Valley Water District) and from groundwater reserves through the use of private wells. Impacts to water availability and reserves, particularly in times of drought, resulting from commercial cannabis cultivation should be considered.

**Alternatives/Mitigation:** Mitigation considered could include caps on the number of licenses issued or the amount of acreage allowed to be used for cannabis operations (i.e. cultivation, etc.) for a given geographical area so as to not exceed or pose an undue burden on available water resources. Mitigation should also explore options for cultivation and manufacturing operations to use recycled and/or recirculated water systems and low water use irrigation technologies.

**Issue PF4:** The EIR should consider and describe the means of providing electrical service to cultivation and processing facilities, and the impacts on demand and availability of such services resulting from increased growing operations (particularly as a result of energy intensive indoor growing facilities), including cumulative impacts from other future anticipated land uses in the County. If generators or other “off the grid” technologies will be considered for cannabis operations, they should be evaluated for their own potential environmental and nuisance impacts to surrounding land uses.

**Alternatives/Mitigation:** Appropriate measures should be developed to ensure expanded cannabis operations in a defined area do not reduce existing or anticipated service levels. Measures to reduce energy usage, while avoiding negative environmental impacts should also be explored.

### **Water Quality/Flooding and Drainage/Groundwater Recharge**

**Issue W1:** The EIR should consider the potential impacts to water quality/runoff, flood and drainage, and groundwater recharge impacts from the expansion of cannabis cultivation and manufacturing activities, particularly in areas where cannabis activities are expected to be concentrated such as the Carpinteria Valley. Cumulative impacts of new operations along with existing agricultural operations should be included, particularly as it relates to increases in impervious surfaces within a defined watershed.

**Alternatives/Mitigation:** Mitigation considered should include implementation of low impact development strategies and stormwater best management practices to address water quality and runoff concerns from cultivation and manufacturing operations. Irrigation methods that result in no or minimal offsite runoff should also be considered. In the case of new greenhouse or building construction, preservation of sufficient permeable areas to allow for onsite runoff retention and percolation should be required.

### **Biological Resources**

**Issue B1:** The EIR should consider the potential impacts to biological and habitat resources from the expansion of cannabis cultivation and manufacturing activities, particularly in areas where cannabis activities are expected to be concentrated such as the Carpinteria Valley. Cumulative impacts of new operations along with existing agricultural operations should be included.

**Alternatives/Mitigation:** Specific means for the protection and preservation of sensitive habitats such as wetlands and creeks should be considered. Means of protection could include but are not limited to on-site preservation and restoration through mandatory buffers or setbacks from such resources, and development restrictions/requirements aimed at avoiding or minimizing impacts to nearby resources.

**Issue B2:** The potential for direct impacts to wildlife domestic pets as a result of pest control activities associated with cannabis cultivation operations should be discussed and evaluated. Use of poisons, rodenticides and similar pest control strategies on cultivation sites near wildlands and/or urban residential areas could result in unintended impacts to wildlife and domestic pets, including incidences where a domestic pet ingests another animal previously exposed to such materials.

**Alternatives/Mitigation:** Mitigation measures to address this concern could include limitations or restrictions on the types of pest control measures permitted to be used in sensitive areas (e.g., near creeks or wildlife corridors, or near residences), requirements for appropriate physical deterrents to discourage targeted wildlife or pets from entering cultivation sites, and written notification to neighboring residential land uses concerning the presence and potential hazards of exposure to such pest control materials.

If you have any questions concerning these comments, please contact me at (805) 755-4414 or by email at [steveg@ci.carpinteria.ca.us](mailto:steveg@ci.carpinteria.ca.us).

Sincerely,



Steve Goggia, Director  
Community Development Department  
City of Carpinteria

Cc: City Ad Hoc Cannabis Committee  
City Council members  
Dave Durflinger, City Manager  
Nick Bobroff, Senior Planner  
Ed Foster, Carpinteria-Summerland Fire Protection District  
Sheriff Bill Brown, Santa Barbara County Sheriff's Department  
Bob McDonald, Carpinteria Valley Water District