
Errata to the Draft EIR for the Cannabis Land Use Ordinance and Licensing Program

Public Comment Period - October 2, 2017, to November 16, 2017

County EIR # 17EIR-00000-00003
SCH #2017071016

Date: October 5, 2017

RE: Errata to the Draft Environmental Impact Report (EIR) for the Cannabis
Land Use Ordinance and Licensing Program

The County of Santa Barbara (County) Planning and Development Department has prepared this Errata sheet to clarify information in the Draft Environmental Impact Report (Draft EIR) for the Cannabis Land Use Ordinance and Licensing Program (Project). The Draft EIR, including the technical appendices, together with this Errata are intended to serve as documents that are subject to comment during the public comment period between October 2, 2017, and November 16, 2017, and will generally inform the decision-makers and the public of environmental effects of the Project, in accordance with Section 15121 of the State Guidelines for Implementation of the California Environmental Quality Act (CEQA Guidelines).

The clarification provided below does not constitute significant new information as defined by CEQA Guidelines Section 15088.5 (*Recirculation of an EIR Prior to Certification*). Information added to the Draft EIR is not considered significant unless "...the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement." In conformance with Section 15088.5 of the CEQA Guidelines, this Errata sheet identifies minor clarifications to the Draft EIR for the Project that do not contain significant new information that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the Project or a feasible way to mitigate or avoid such an effect. Further, as these clarifications are identified during the public comment period, this Errata is subject to public review and comment along with the Draft EIR.

Clarification (Chapter 4, Alternatives Analysis)

Chapter 4, *Alternatives Analysis* of the Draft EIR includes a clarification in Section 4.1.3, *Alternatives Considered and Discarded* that the "Existing Registrants Alternative" was discarded in favor of Alternative 3, the "Reduced Registrants Alternative." This clarification on page 4-8 and 4-9 of the Draft EIR has been made to more accurately reflect the considerations made during the EIR drafting process. The discarded "Existing Registrants Alternative" considered outcomes that are addressed in Alternative 3, including a more limited opportunity for the existing cannabis industry. Alternative 3 more closely aligns with the amount of existing County operators and greatly limits the amount of potential expansion, instead of relying on the existing demand from growers under the discarded "Existing Registrants Alternative." This clarification has been made in order to ensure consistency and avoid duplication of analysis within Chapter 4, *Alternatives Analysis* of the Draft EIR. This update does not change the conclusions or significance level of any identified impact. Therefore, the following text correction is made:

4.1.3 Alternatives Considered and Discarded

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). 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., distributed as follows:

- ~~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: 189~~
- ~~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 limit on the quantity of licenses may result in future illegal or non-compliant operations once the total number of licenses are issued, and could result in associated detrimental, unregulated indirect impacts from continued unlicensed activities within the County. As a result, this alternative was discarded from further consideration.~~