Section 3.2
Agricultural and Timber Resources

3.2.1 Introduction

Agricultural and timber resources include active agricultural and timber production operations, prime and productive non-prime soils, and forest land with existing or potentially productive stands of timber. This section evaluates potential future impacts (beyond existing baseline environmental conditions) related to agricultural and timber resources from implementation of the proposed Commercial Cannabis Cultivation and Manufacturing Regulations and Licensing Program (Program), including the Project and More Permissive Project scenarios. It includes a discussion of the existing agricultural and timber resources in the County of Santa Cruz (County), as well as the applicable regulations pertaining to the Program. Proposed Program standards and restrictions that address environmental resources are also described. Potential Program impacts are evaluated, and where applicable, mitigation measures are proposed. Key resources and data used in the preparation of this chapter include the Santa Cruz County General Plan Conservation and Open Space Element, Santa Cruz County Code (SCCC), U.S. Natural Resources Conservation Service (NRCS) Soil Survey Maps, Farmland Monitoring and Mapping Program (FMMP) maps, County geographic information system (GIS) data, and cannabis cultivation registration data and manufacturing data collected to inform the Program in 2016/2017 by the County.

3.2.2 Environmental Setting

The County has a mild climate with an average rainfall of 28 inches per year (depending on the region) and approximately 260 days of sunshine per year, as well as a variety of soils that create ideal conditions and long growing seasons for a diversity of agricultural crops, especially in the South County region (Fast Forward, Inc. 2017). The County supports extensive areas of both productive agriculture and timber. The Santa Cruz Mountains and inter-mountain valleys support extensive forests with active timber production operations, particularly in the North Coast and Mountain regions. In 2013, the agricultural industry (including timber) employed 11,085 people, including 6,151 direct employees and 4,934 additional employees in related fields. Direct employment in agriculture amounts to 4.5 percent of all jobs in the County (Agricultural Impact Associates 2013).

The County’s agricultural zoning districts include CA – Commercial Agriculture, A – Agriculture, and AP – Agricultural Preserve and comprise 82,422 acres of the County. The intent of the CA zoning district is to preserve commercial agricultural lands and their economic integrity. The A zoning district provides for non-commercial agricultural uses, such as family farming and animal raising, and...
allows limited commercial agricultural activities. Such non-commercial agricultural lands are identified by the County in order to recognize that they are still productive lands and have other values associated with large lot open space characteristics. The AP zoning district permits commercial agricultural uses for agricultural and open lands under an agricultural preserve contract; the AP designation is used as an overlay to indicate parcels with Williamson Act agricultural preservation or open space contracts, or similar preservation easements. In addition, the RA – Residential Agriculture zoning district is defined by the SCCC as a residential use zone that permits both single-family residential and small-scale, secondary-use commercial agricultural uses.

Harvesting occurs within at least 15,149 acres of agricultural crop land (not including grazing land areas) and approximately 86,948 acres of timberland. Per the County’s 2015 Crop Report, the total gross production value of Santa Cruz County agricultural commodities for 2015 was $625 million, including a timber value of $4.9 million (see Table 3.2-1). Timber production is primarily focused on redwood, but also includes some Douglas fir and hardwood operations. Organic farming and pastures comprised 6,621 acres in 2015, and was valued at $114 million. Cultivated agriculture is concentrated in the South County region, where the highest production value crop is strawberries ($219 million), followed by raspberries ($142 million), artichokes, broccoli, Brussel sprouts, apples, and cut flowers. Unseasonable weather in 2015 significantly impacted apple and wine grape production, and production yields saw a decrease of 50 percent from the previous year. Overall production values remained high due to generally fertile soils and consumer demand for high value crops. Processing, transportation, marketing, farm employment, and other farm-related services further contributed to the local agricultural economy (County of Santa Cruz 2015).

Agricultural resources in the County include 14,481.92 acres of prime farmland, 2,493.18 acres of farmland of statewide importance, 3,932.90 acres of unique farmland, and 356.18 acres of farmland of local importance as identified under the State FMMP1 (Department of Conservation 2010). The FMMP utilizes data from the NRCS concerning prime soil types to determine the type of farmland in a certain area, such as “prime farmland”. Additionally, approximately 55,164 acres within Santa Cruz County are eligible for Land Conservation Act contracts (Williamson Act2; Department of Conservation 2010). A substantial amount of agricultural lands (19,957 acres) are also non-irrigated grazing and pasture lands where the prevalence of steep slopes, and less fertile, drier lands may limit their agricultural use (Department

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1 The FMMP assesses the location, quality and quantity of agricultural lands and monitors the conversion of these lands to nonagricultural uses. The FMMP classifies important farmland based on agricultural soil quality and current land use into four categories of important farmlands: prime farmland, farmland of statewide importance, unique farmland, and farmland of local importance. Important farmlands contain soils best suited for producing food and forage, particularly for producing high-yield crops.

2 A Williamson Act contract is an agreement between private landowners and the government to restrict specific parcels of land to agricultural or related open space uses in return for reduced property tax assessments (refer to Section 3.2.3, Regulatory Setting, for additional discussion).
of Conservation 2016). While grazing land makes up approximately half of the agricultural acreage in the County, irrigated crops produce the greatest value.

Forested lands and timberland occupy a substantial portion of the County with large areas of timber production in the Santa Cruz Mountains. The Timber Production (TP) zoning district extends across 71,306 acres of the County, primarily in the North Coast and Mountain Regions. The intent of the TP zoning district is to protect and maintain the County’s larger tracks of timberland, and to preserve agriculture and other open space uses where they are compatible with timberland uses. Separate from the TP zoning district are areas identified by the County as “Timber Resources”. These timber resources have been mapped as defined by the General Plan, and in addition to TP lands, if they are on lands zoned CA or M3 – Mineral Extraction. On these lands, timber may be grown and harvested if there are sufficient timber resources to meet minimum stocking standards.

Timberlands can produce an average annual volume of wood fiber of at least 15 cubic feet per acre. Timberlands may occur within all zoning districts of the County, and are not solely limited to TP areas. Nevertheless, the majority of timberlands are within the TP zoning district, with 71,004 acres of timberland within TP zoning, out of a total of 90,647 acres of timber resource designated lands. This indicates that there are 19,643 acres of timberland contained within other zoning districts; the TP zoning district has approximately 302 acres of land that are not mapped as timberland. Of the 19,643 acres of timberland not contained within the TP zoning district, 10,014 acres are contained within the Special Use (SU) zoning district and 4,024 acres are contained within the RA zoning district (Appendix D).

Timberland areas are generally governed by four types of state-issued permits for timber harvesting, which are further detailed in Section 3.2.3, Regulatory Setting: the Timber Harvest Plan (THP), the Non-Industrial Timber Management Plan (NTMP), Exemptions to a THP, and the Conversion Exemption. If the logs are going to be “commercialized,” (meaning sold for cash or bartered for services), then one of these state permits is required. Under a court ruling, the County may regulate through zoning where harvesting is allowed, and may participate in the State permitting process in the review of all proposed harvests. The County’s agricultural industry continues to grow and change over time with trends of converting grazing lands to more intensive farming uses with higher value irrigated crops (County of Santa Cruz 2015).
### Table 3.2-1 Summary of Agricultural Production in Santa Cruz County (2015)

<table>
<thead>
<tr>
<th>Agricultural Production/Crop</th>
<th>Harvested Acreage&lt;sup&gt;1&lt;/sup&gt;</th>
<th>Production Value&lt;sup&gt;2&lt;/sup&gt;</th>
<th>Percentage of Total Production Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Strawberries</td>
<td>3,124</td>
<td>$219,233,000</td>
<td>35%</td>
</tr>
<tr>
<td>Raspberries</td>
<td>2,656</td>
<td>$142,808,000</td>
<td>23%</td>
</tr>
<tr>
<td>Nursery Stock&lt;sup&gt;3&lt;/sup&gt;</td>
<td>736</td>
<td>$69,027,000</td>
<td>11%</td>
</tr>
<tr>
<td>Cut Flowers &amp; Cut Greens&lt;sup&gt;4&lt;/sup&gt;</td>
<td>323</td>
<td>$50,093,000</td>
<td>8%</td>
</tr>
<tr>
<td>Blackberries</td>
<td>844</td>
<td>$41,949,000</td>
<td>7%</td>
</tr>
<tr>
<td>Misc. Vegetables</td>
<td>2,526</td>
<td>$40,661,000</td>
<td>7%</td>
</tr>
<tr>
<td>Lettuce, Head &amp; Leaf</td>
<td>3,735</td>
<td>$23,409,000</td>
<td>4%</td>
</tr>
<tr>
<td>Brussels Sprouts</td>
<td>1,129</td>
<td>$16,350,000</td>
<td>3%</td>
</tr>
<tr>
<td>Livestock and Animal Products</td>
<td>N/A</td>
<td>$7,289,000</td>
<td>1%</td>
</tr>
<tr>
<td>Apples</td>
<td>2,050</td>
<td>$6,313,000</td>
<td>1%</td>
</tr>
<tr>
<td>Timber</td>
<td>9,614 million board feet</td>
<td>$4,907,000</td>
<td>1%</td>
</tr>
<tr>
<td>Wine Grapes</td>
<td>656</td>
<td>$2,352,000</td>
<td>0.4%</td>
</tr>
<tr>
<td>Misc. Berries</td>
<td>104</td>
<td>$675,000</td>
<td>&lt;0.01%</td>
</tr>
<tr>
<td>Misc. Tree and Vine Fruit</td>
<td>281</td>
<td>$372,000</td>
<td>&lt;0.01%</td>
</tr>
<tr>
<td>TOTAL</td>
<td>&gt;15,159</td>
<td>$625,438,000</td>
<td>100%</td>
</tr>
</tbody>
</table>

<sup>1</sup>Harvested acreage is not reflective of land area, but of acres harvested where in some cases, crops may be harvested more than once per year. Vineyards and orchards not yet producing are not included in the harvested acreage.

<sup>2</sup>Represented as gross values.

<sup>3</sup>Nursery stock includes the categories: Indoor Potted Plants, Landscape Plants and Other Plants, such as farm stock and Christmas trees.

<sup>4</sup>Cut flowers and cut greens includes field and greenhouse production.

Source: County of Santa Cruz, Agricultural Commissioner’s Office (County of Santa Cruz 2015).

### Table 3.2-2 Summary of Agricultural Areas in Santa Cruz County

<table>
<thead>
<tr>
<th>Area</th>
<th>Total land zoned for Agriculture A, CA, and TP (acres)</th>
<th>Total Agricultural land under FMMP&lt;sup&gt;1&lt;/sup&gt; (acres)</th>
<th>Williamson Act Contracts (acres)</th>
<th>Timberland (acres)</th>
</tr>
</thead>
<tbody>
<tr>
<td>North Coast</td>
<td>38,548</td>
<td>11,186</td>
<td>19,370</td>
<td>28,103</td>
</tr>
<tr>
<td>Mountain</td>
<td>34,018</td>
<td>903</td>
<td>616</td>
<td>45,589</td>
</tr>
<tr>
<td>Urban</td>
<td>6,914</td>
<td>564</td>
<td>531</td>
<td>5,148</td>
</tr>
<tr>
<td>South County</td>
<td>46,276</td>
<td>29,017</td>
<td>34,109</td>
<td>11,552</td>
</tr>
<tr>
<td>TOTAL</td>
<td>125,756</td>
<td>42,843&lt;sup&gt;2&lt;/sup&gt;</td>
<td>55,164</td>
<td>90,647</td>
</tr>
</tbody>
</table>

<sup>1</sup>Acres of total agricultural lands represents lands surveyed by the FMMP and includes prime farmland, farmland of statewide importance, unique farmland, farmland of local importance, and grazing farmland.

<sup>2</sup>Also includes 1,172 acres of FMMP land within municipal boundaries.

Sources: Department of Conservation 2010. Santa Cruz County 2016.
Santa Cruz County Timberland

LEGEND
- Santa Cruz County Boundary
- Incorporated City
- Timberland

SCALE IN MILES

FIGURE 3.2-3
Based on the 2016 License Registration and 2016 Growers Survey data, existing cannabis cultivation operations are concentrated in the Mountain Region and South County, primarily within the San Lorenzo Valley and Pajaro Valley. Data on the location of existing cannabis manufacturing operations is less robust, but based on Sheriff’s Office records and communications with CalFire personnel, violations have been concentrated in the more remote, mountainous or forested regions of the County. Sheriff records, other enforcement data and interviews with forest production professionals and CalFire staff show that existing illegal cannabis operations can potentially interfere with timber production operations through overuse of roads and increased risk of fires; and exploitation of water resources and use of pesticides or rodenticides, which can also interfere with habitat and wildlife value priorities within TP zoned areas (see also, Section 3.4, Biological Resources). Between January 2015 and December 2016, the County Sheriff’s Office reported a total of 200 cannabis site related enforcement cases within the County, with many located within TP zone areas (Appendix D).

Agricultural and Timber Uses within Regions of Santa Cruz County

North Coast Region

The North Coast Region includes 27,322 acres of land zoned TP, which comprises approximately 38 percent of the 72,673-acre region. The region also supports 11,216 acres of land zoned for A, CA and AP. Much of the region is within the coastal zone and land use is dominated by a mix of public lands, including multiple state parks and U.S. Bureau of Land Management holdings, and private agricultural and timber operations. Agriculture and some cattle grazing occur along the coastal terraces, with pockets of agricultural use occurring in the hillside and mountainous areas. Larger residential lots are located within the community of Bonny Doon. Approximately 19,892 acres of land in the region are enrolled under Williamson Act contracts, equating to approximately 27 percent of the North Coast Region’s land. FMMP-identified farmland in the region comprises 11,186 acres, with 9,486 of those acres for use as grazing land. Prime farmland is concentrated in the Bonny Doon planning area, totaling 633 acres, while the North Coast planning area contains approximately 99 acres of prime farmland. The North Coast Region supports approximately 28,103 acres of timberland or 31 percent of the total amount of County timberland, primarily located in the mountainsides inland of Highway 1. Big Creek Lumber’s redwood sawmill located on Highway 1 north of Davenport cuts, planes, and processes over 85,000 board feet of lumber each day. The company has approximately 190 employees at its six locations. Based on cannabis cultivation registration data, 44 cultivation sites are currently in operation in this region, totaling 2.84 acres of canopy. Existing operations are located primarily near Bonny Doon, within its proximate semi-rural agricultural community.

Mountain Region

The 101,907-acre Mountain Region contains the largest amount of land zoned for TP in the County, with approximately 31,828 acres of TP zoned land, with the majority located in the San Lorenzo Valley area (17,196 acres). Land uses in the Mountain Region are predominantly SU, which comprises approximately 42 percent of the region’s zoned land areas, but is followed by TP zoning at approximately 31 percent of the region’s zoned land areas. The Mountain Region contains the greatest extent of timberland in the County, with approximately 45,589 acres (50.3 percent of County total) located in the Mountain Region, with over half of this timberland (23,601 acres) located in the San Lorenzo Valley. The 22,169-acre Skyline planning area is comprised of over half timberland (11,546 acres), and the Summit planning area is comprised of nearly one-third timberland (10,442 acres). As such, this region is a primary producer of timber within Santa Cruz County. Approximately 616 acres
of land in the region are enrolled under Williamson Act contracts, located primarily near the Skyline and Summit areas and equating to less than one percent of the Mountain Region's total land area. Agriculture under FMMP farmland in the region comprises 564 acres, with very little grazing land and is primarily located near the Skyline and Summit areas. Currently, 240 cultivation sites are in operation in this region, totaling 18.05 acres of canopy.

**Urban Region**

The Urban Region encompasses unincorporated urban communities of Aptos, Live Oak, and Soquel that border the cities of Santa Cruz, Scotts Valley, and Capitola, with the lowest amount of land designated for agricultural or timber production of any of the four identified regions. Zoning for A, CA, AP, and TP comprise approximately 6,914 acres of the 26,023-acre Urban Region. This region also includes a large concentration of lands designated for manufacturing by the County. Timber production along with limited agricultural uses, including modest commercial agriculture is prominent in the northern Carbonera planning area. Approximately 531 acres of land in the region are enrolled under Williamson Act contracts, equating to approximately 2 percent of the Urban Region's land, with most located in the Aptos and Carbonera planning areas and none near Live Oak. Agriculture identified under FMMP in the region comprises 564 acres, with 340 of those acres for use as grazing land. The Aptos area contains the greatest amount of FMMP farmland (276 acres). Prime farmland is only identified in the Aptos and Carbonera areas, totaling 111 acres. The Urban Region supports approximately 11,552 acres (5.7 percent) of timberland, primarily located in the mountains north of Scotts Valley in the Carbonera planning area (3,858 acres). Based on cannabis cultivation registration data, currently 130 cultivation sites are in operation in this region, totaling 6.24 acres of canopy.

**South County Region**

The 68,721-acre South County Region contains the largest amount of land zoned for agriculture in the County, with approximately 36,931 acres zoned for A and CA. This region is the predominant producer of strawberries, raspberries, and miscellaneous vegetables, notably lettuce, within Santa Cruz County. Approximately 34,109 acres of land in the region are enrolled under Williamson Act contracts, equating to approximately half of the South County Region's land and a majority located in the Salsipuedes and Pajaro Valley areas. Agriculture under FMMP farmland in the region comprises 29,017 acres, with over 10,000 of those acres for use as grazing land. Land uses in the South County Region are predominantly commercial agriculture, which comprises approximately 46 percent of the region's land area, but also includes residential and industrial land uses around the City of Watsonville, in addition to other small communities such as Corralitos and Freedom. The area around Salsipuedes contains the greatest amount of both FMMP farmland (13,845 acres), comprising clear majorities of its 17,486-acre planning area. The Pajaro Valley, San Andreas, and Salsipuedes areas contain the greatest amount of prime farmland in the County, with 2,720 acres, 3,457 acres, and 4,842 acres respectively. The South County Region contains the least amount of timberland of the four regions, with approximately 5,148 acres (16.8 percent of County total), primarily located in the Eureka Canyon hills (7,257 acres). Currently, 148 cultivation sites are in operation in this region, totaling 17.08 acres of canopy.
3.2.3 Regulatory Setting

The agricultural and timber resources analysis was conducted in conformance with the goals and policies of federal, state, and local regulations, as discussed below. Federal regulations are contained within Appendix A.

3.2.3.1 State

California Land Conservation Act of 1965 (Williamson Act; Section 51200-51297.4)

The Williamson Act enables local governments to enter contracts with private landowners for restricting specific parcels of land to agricultural or related open space uses in return for reduced property tax assessments. Specifically, this legislation enables landowners who voluntarily agree to participate in the Williamson Act program, to receive assessed property taxes per the income-producing value of their property in agricultural use, rather than on the property's assessed market value.

Per California Government Code Section 51201, an agricultural commodity under the Williamson Act means “any and all plant and animal products produced in this state for commercial purposes”, and an agricultural use consisting of “use of land, including but not limited to greenhouses, for the purpose of producing an agricultural commodity for commercial purposes”, however cannabis cultivation activities are not specifically mentioned or limited. Additionally, guidance from the Department of Conservation has stated that medical marijuana is an agricultural product, under both the 2015 MCRSA statutes and the Williamson Act. Nothing in the Williamson Act prohibits the growth of medical marijuana on land enrolled in the Williamson Act.

California Right to Farm Act (California Civil Code Section 3482.5)

The California Right to Farm Act (California Civil Code Section 3482.5)—enacted in 1981—provides that a farming activity cannot be a public nuisance if all the following factors are met:

1) The activity is in support of the production of an agricultural commodity;
2) The agricultural activity is commercial in nature;
3) The activity is conducted “in a manner consistent with proper and accepted customs and standards as established and followed by similar agricultural operations in the same locality;”
4) The farming activity must have been in operation for at least three years; and
5) The farming activity was not a nuisance at the time it began.

It is noteworthy that the California Right to Farm Act does not require “best management practices” but instead simply allows adherence to “accepted” customs and practices. In addition, the statute specifically states that it prevails over any contrary provision of a city or county ordinance or regulation, but does allow cities and counties to require disclosures to be given to prospective home buyers that a dwelling is near an agricultural operation.
California Forest Practice Rules (2017) – Forest Practice Act

Prepared for California Licensed Timber Operators and California Registered Professional Foresters, the California Forest Practice Rules compile relevant excerpts from Title 14 of the California Code of Regulations Chapters 4, 4.5, and 10, the provisions of the Z’berg-Nejedly Forest Practice Act of 1973 in a manner consistent with other laws, including but not limited to, the Timberland Productivity Act of 1982, the California Environmental Quality Act (CEQA) of 1970, the Porter-Cologne Water Quality Act, and the California Endangered Species Act.

The THP is comprised of the environmental review documents submitted by landowners to CalFire outlining what timber he or she wants to harvest, how it will be harvested, and the steps that will be taken to prevent damage to the environment. THPs are prepared by Registered Professional Foresters (RPFs) who are licensed to prepare these comprehensive, detailed plans.

Under the FPA, local jurisdictions can propose for consideration by the State special local regulations for timber harvesting. Several local regulations have been approved by the State over the years through this process, which are enforced by CalFire.

California Government Code Section 51104(g) – California Timberland Productivity Act of 1982

The California Timberland Productivity Act of 1982 (California Government Code Section 51100-51104) is intended to maintain the limited supply of timberland to ensure its current and continued availability for the growing and harvesting of timber and compatible uses, and to discourage premature or unnecessary conversion of timberlands to urban and other uses. Section 51104(g) of the Act states that a Timberland Protection Zone (TPZ) is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, defined as “any use which does not significantly detract from the use of property for, or inhibit, growing and harvesting timber”. The County’s Timber Harvesting regulations (SCCC 16.52) implement these objectives throughout the TP zoning district.

California PRC Section 12220(g)

This section defines “forest land” as land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.

California PRC Section 4526

This section defines “timberland” as land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees. Commercial species shall be determined by the board on a district basis.
3.2.3.2  Local

Agricultural Operations within the County

Within the County, the Agricultural Commissioner conducts outreach and provides some oversight to agricultural and timber production in the County. The Agricultural Commission is divided into two departments consisting of the Agricultural Department and the Weights and Measures Department. The Agricultural Department conducts a majority of the outreach and assembles the annual Crop Report, in addition to certifying producers for farmers’ markets, overseeing nursery inspections, and oversight of the County’s Organic Program. The Weights and Measures Department primarily oversees agricultural manufacturing in the County and end-product measuring at locations such as grocery stores. For instance, agricultural product labels will be examined to ensure correctness, and measuring scales will be similarly tested for accuracy. At least eight cannabis dispensaries have been assessed for product weight within the County. Requirements for pesticides and organic producers entail participation and oversight from CalEPA, the County Agricultural Commissioner, and the California Department of Food and Agriculture, which has oversight of all agricultural products.

Timber Production and Harvesting in the County

For timber production, the Santa Cruz County General Plan states the objective, “To encourage the orderly economic production of forest products on a sustained yield basis under high environmental standards, to protect the scenic and ecological values of forested areas, and to allow orderly timber production consistent with the least possible environmental impacts.”

The California Forest Practice Rules (FPR) require CalFire to establish interdisciplinary review teams (including a representative of county government when the county government so requests) to review plans and assist CalFire in the evaluation of proposed timber operations and their impacts on the environment. County staff review of proposed timber harvests is focused on conformance with the Santa Cruz County rules as included in the FPR, with an emphasis on the protection of water quality and biotic resources. In addition, neighborhood issues such as noise, dust, scenic road protection, and health and safety issues are also included in the County’s review.

There are four types of state issued permits for timber harvesting: the THP, the Non-NTMP, the Exemption to the THP, and the Conversion Exemption. If the logs are going to be “commercialized,” (meaning loaded on a truck and sold to a mill), then one of these state permits is required. While the County does not have a formal role in regulating timber harvest practices, other than proposing special local rules for State consideration, it does limit through its zoning powers, where timber harvesting can take place. At this time, commercial timber harvesting is only allowed on lands zoned TP, CA, and M3.

Santa Cruz County General Plan – Conservation and Open Space Element

The Santa Cruz County General Plan provides a framework for development and growth in the County. The General Plan’s Conservation and Open Space Element contains various goals and policies that address agricultural resources and timber resources, including the preservation and expansion of agricultural and timber land use within the County. Such lands are designated A, CA, and TP by the Land Use Element of the Comprehensive Plan and provide opportunities for a range of commercial agricultural operations.
The policies outline the County’s priority to preserve and, where feasible, expand and intensify agricultural land uses. Agricultural operations are encouraged in areas containing both prime and non-prime soils. Consistency with Comprehensive Plan goals and policies is further discussed in Section 3.10, *Land Use and Planning*. Relevant goals and policies are summarized below.

**Objective 5.13 Commercial Agricultural Land.** The purpose of this objective is to maintain for exclusive agricultural use those lands identified on the County Agricultural Resources Map as best suited to the commercial production of food, fiber, ornamental crops, and livestock, and to prevent conversion of commercial agricultural land to non-agricultural uses.

**Policies 5.13.1 through 5.13.22:** Include the designation of commercial agricultural land, maintain the types of agriculture levels, provide land use designations for agricultural resource lands, determine the zoning of commercial agricultural resource land (CA), and determine principal permitted uses on CA zoned land. Land divisions and conversions of CA lands are also addressed.

**Policy 5.13.5 Principal Permitted Uses on Commercial Agricultural (CA) Zoned Land.** Allow principal permitted uses in the CA Zone District to include only agricultural pursuits for the commercial cultivation of plant crops, including food, flower, and fiber crops, and raising of animals including grazing and livestock production and, outside the coastal zone, timber harvesting operations.

**Policy 5.13.6 Conditional Uses on Commercial Agricultural (CA) Zoned Lands.** Conditional uses on CA zoned lands must constitute the principal agricultural use of the parcel, be ancillary in nature, cannot impair long term agricultural viability, and avoid the removal of land from agricultural production. Only agriculturally oriented structures or dwellings are allowed, including residential land use when in direct support of preserving agriculture.

**Policy 5.13.8 Location of Agricultural Support Facilities.** Require agricultural support facilities to locate either off good agricultural soils, or on the perimeter of good agricultural soils.

**Policy 5.13.9 Utility District Expansion.** Utility district expansion is prohibited onto CA land Types 1 (viable agricultural land) and 3 (within the Coastal Zone).

**Policies 5.13.23 through 5.13.34 Resolving Operational and Land Use Conflicts.** Operational and land use conflicts are determined and addressed, among other items, via agricultural buffers, Agricultural Policy Advisory Commission approval (consistent with the Agricultural Land Preservation and Protection Ordinance within the Santa Cruz County Code [SCCC]), implementing windbreaks to reduce the hazards of pesticide drift, and issuing residential and ancillary use building permits in accordance with the SCCC.

**Objective 5.14 Non-Commercial Agricultural Land.** The purpose of this objective is to encourage and provide for limited agricultural uses, such as small-scale agriculture and community gardens, on the limited amount of agricultural land remaining in the County, which is not designated as commercially viable, in order to maintain a diversity of farm operations and to maintain productive open space and rural character.

**Policy 15.14.1 Uses Allowed on Non-Commercial Agricultural (A) Zoned Lands.** For parcels 2.5 acres or smaller, uses may include one residence and accessory uses, agricultural uses, and community facilities that do not conflict with any adjacent agricultural activity. For parcels over 2.5 acres, a range of agricultural uses are allowed, including both commercial and non-commercial
agricultural activities, one residence, and uses consistent with the Coastal Act and not conflicting with adjacent agricultural activity. Agricultural service establishments are also allowed where the business is compatible with the agricultural area, supports farming operations in the area, would not conflict with agricultural practices or residential uses, and would protect agricultural production and resource values.

Policy 15.14.5 Encourage Farming. Encourage the use of rural lands for farming use to the extent that topography, soil, climate, and water supply will allow.


Objective 5.15 Specialized Agricultural Uses – Greenhouse Agriculture. The purpose of this objective is to recognize and provide for a variety of agricultural uses such as greenhouses, aquaculture, and wineries on lands which are appropriately suited for these specialized uses in order to maintain the optimum agricultural diversity.

Policy 5.15.1 Agriculture Inside Structures. Recognize that certain forms of agriculture requiring production of crops or related products inside structures may be a necessary part of an agricultural operation, and require any such uses to mitigate any impacts created by such facilities to minimize land use conflicts and/or environmental problems.

Policy 5.15.2. Runoff Retention. In primary recharge areas, require stormwater runoff to be retained on site for percolation; in other areas require detention.

Policy 5.15.3 Preserving Prime Soil. Prohibit removal of indigenous prime soil used as a growing medium for container plants which are sold intact.

Policy 5.15.4 Limiting Impervious Surfaces. Limit flooring or impervious surfacing within the structure which impairs long-term soil capabilities to the minimum area needed for access, loading, and storage, and prohibit the use of long-term sterilants under impervious surfacing.

Objective 5.12 Timber Production. The purpose of this objective is to encourage the orderly economic production of forest products on a sustained yield basis under high environmental standards, to protect the scenic and ecological values of forested areas, and to allow orderly timber production consistent with the least possible environmental impacts.

Policies 5.12.1 and 5.12.2 Designation of Timberlands and uses within Timber Production Zones. The General Plan has designated those timberlands which are devoted to and used for growing and harvesting timber and which are capable of producing an average annual volume of wood fiber of at least 15 cubic feet per acre. Primary uses in these areas can include, besides the growing of harvesting of timber and other forest products in conformance with the provisions of the Timber Production Zoning SCCC ordinance and the Forest Practice Act, grazing and other agricultural uses on the portion of the land not under timber production, one single-family dwelling with accessory structures and utilities, and timber removal as necessary for the safe operation of public utility facilities.

Policy 5.12.3 Conditional uses within Timber Production Zones. Uses allowed within TP zoning must be consistent with the growing of a sustained yield tree crop, supported by a timber management plan, though may include conversion to agricultural uses not exceeding ten percent of the total of the timber area on the parcel and the inclusion of one habitable accessory structure
(guest house) on a parcel with a minimum size of 10 gross acres in the County in close proximity to the principle residence.

Policy 5.12.7 Location of Development on Timber Production Lands. Restrict development on TP lands to be located on a non-timbered portion of the property.

Policy 5.12.8 Timber Resource Land Not Zoned Timber Production. Evaluate proposed land divisions and residential development permit applications on parcels larger than 20 gross acres designated Timber Resource on County mapping, but not zoned TP, for timber resource potential. Apply the TP land division and residential density requirement policies for any parcel found to have timber resources equivalent to TP parcels. Require, as a condition of any land division, rezoning to TP for parcels which have equivalent timber resources.

Policies 5.12.9 and 5.12.10 Rezoning Lands to and from Timber Production. Encourage timberland owners to apply for TP zoning where appropriate. Such rezoning must be in accordance with the procedures set forth in the TP ordinance. Deny rezoning of timberland from TP to alternate zone districts unless it can be shown that the rezoning is consistent with appropriate legislation.

Policy 5.12.11 Timber Harvests Not Subject to State Regulations. Ensure that all small timber harvests over which the County has regulatory authority, are adequately regulated, either through adoption of State Forest Practice Rules or through the enactment of local ordinance.

Policy 5.12.14 Zone Districts Where Timber Harvesting is Allowed. Allow timber harvesting and associated operations, requiring approval of a Timber Harvesting Plan by the California Department of Forestry, only in the TP, Parks, Recreation and Open Space (PR), Mineral Extraction Industrial (M-3), and the Commercial Agriculture (CA) zone districts, except any coastal zoning.

County of Santa Cruz Zoning Regulations (SCCC Chapter 13.10)

The County Zoning Ordinance constitutes a portion of Title 13 of the SCCC. SCCC Chapter 13.10 determines what uses, design criteria, densities, setbacks, heights and similar development standards may occur within different zoned areas of the County, regulating the uses of land and structures within the County consistent with legislative acts. The zoning ordinance is adopted to implement the General Plan and Local Coastal Program Land Use Plan by providing specific regulations addressing the allowable uses of land and structures; promotion and protection of the public health, safety, and general welfare; protection of the character, stability, and satisfactory interrelationships of residential, commercial, industrial, agricultural, recreational, and open space areas of the County; and protection of the natural environment in compliance with CEQA.

Sections 13.10.311 – 13.10.315 list purposes and standards for the County’s Agricultural Districts, while Sections 13.10.371 – 13.10.378 list similar information for the County’s Timber Production District. Development within agricultural and timber zones should be established in compliance with the requirements in Chapter 13.10 of the zoning ordinance and all applicable standards in Title 13 of the SCCC. A, CA, AP, RA zoning districts all guided by the SCCC, which designates development or use exemptions or actions including an Agricultural Viability Determination, administrative permit approval, design review, discretionary review, or a public hearing.
Santa Cruz County Code, Chapter 16.50 Agricultural Land Preservation and Protection

Chapter 16.50 designates and protects commercially viable agricultural land which exists within the County, and which is in the public interest to preserve and protect for exclusive agricultural use. This regulation seeks to enhance and encourage agricultural operations within the County, and acknowledges certain agricultural land in the County, not presently of commercial value, that merit protection.

Santa Cruz County Code, Chapter 16.52 Timber Harvesting Regulations

Chapter 16.52 determines, protects, and maintains County timberlands through regulation of timber harvesting. The Chapter encourages the continued production of forest products in compliance with performance standards, which emphasize protection of environmental and open space values while fostering increased productivity of forest land. This regulation also serves to protect, maintain and improve the forest land of Santa Cruz County.

Santa Cruz County Code, Chapter 16.34 Significant Trees Protection

Chapter 16.34 encourages and enforces the preservation of significant trees and forest communities on private and public property as necessary to promote the public health, safety, and general welfare of the County. (These regulations only apply in the Coastal Zone area.) Exemptions for timber operations, timber harvesting, permitted removals, and removal due to agricultural operations are provided.

Agricultural Update and Measure J

Measure J was approved by Santa Cruz County voters and became law in 1978, codified as Chapter 17.01 of the SCCC. To recognize that the needs of the industry change over time, the County is in the process of updating the regulations to implement Measure J by preserving agricultural land for agricultural use and maintaining essential regulations protecting agricultural land, while responding to input from the local farming community that updates to agricultural regulations are needed to support the evolving and diverse needs of local agriculture.

The Agricultural Update would maintain existing policies preventing the conversion of agricultural land to nonagricultural uses and includes: 1) a minimum density requirement of 40 acres per residential dwelling unit for new land divisions on commercial agricultural land, to de-emphasize residential development and use, and 2) continued prohibition of Commercial Agricultural Land subdivision, unless for agricultural purposes.

The update would also support the needs of diverse local farming operations, allowing uses on CA land that support agriculture while providing standards and appropriate reviews to protect agricultural land, including: 1) allowance of agri-tourism, which can be important to many smaller local farms, and which includes classes and field trips, farm stays, and farm-to-table dinners, with discretionary review required for larger or more frequent events, 2) allowance of agricultural service establishments, such as farm equipment repair or sales, on commercial agricultural land with discretionary approval, and by allowing such uses when they are compatible with and secondary to the main agricultural use, 3) allowance of agricultural support uses, such agricultural equipment storage, to serve larger farming operations extending over multiple parcels, while requiring that the storage is compatible with and secondary to the main agricultural use, through a Master Plan.
approach, and 4) allowance of housing for agricultural employees (up to 12 units) on agricultural land as a principally permitted agricultural use, as required by state law. A site development permit would be required to ensure appropriate siting.

### 3.2.4 Methodology and Assumptions

This analysis of potential impacts on the agricultural and timber resources of the County provides a qualitative assessment of the effects of Program implementation on the existing environment described in Section 3.2.2, *Environmental Setting*, including the Project and the More Permissive Project scenarios. Refer to Section 3.0, *Introduction and Approach Analysis*, for a detailed discussion of projected cannabis activities in the County due to Program implementation. This analysis also assumes that cannabis structures would be required to meet County Fire Code requirements, as described in Section 3.0, *Introduction and Approach to Analysis*.

Land use compatibility between the proposed Program and agricultural operations are analyzed further in Section 3.10, *Land Use and Planning*. Existing development standards and standard permit processes and conditions as well as development standards and requirements proposed as part of the Project that would serve to mitigate environmental impacts are referenced in the analysis below.

Potential secondary impacts of the Program are associated with continued or expanded unlicensed cultivation and sometimes substandard manufacturing facilities, particularly unregulated agricultural cultivation practices in prime farmland and timber resource areas with potentially volatile manufacturing processes. Adoption of the Program could result in the potential for changing or increased unlicensed cannabis activities. Due to the lack of information regarding unknown cannabis cultivation and manufacturing operations within the County and specific details regarding unknown sites, the discussion of secondary impacts is general in nature.

Assessment of potential Program impacts considers existing General Plan and Local Coastal Program policies and the SCCC sections that could mitigate the loss of prime soils and associated farmland, in addition to mitigating the loss of timber resources, along with the Program's draft ordinances that require licenses to be consistent with the County's policies, objectives, laws, regulations, and programs. This analysis accounts for Program restrictions for cultivation such as those from schools and parks (600 feet); analysis also accounts for the manufacturing ordinance which relies on existing zone district and fire code restrictions and setbacks.

### 3.2.5 Significance Criteria

#### CEQA Guidelines Thresholds

The following thresholds of significance are based on Appendix G of the 2017 CEQA Guidelines. For purposes of this EIR, implementation of the Program may have a significant adverse impact on agricultural and timber resources if it would:

- Convert prime farmland, unique farmland, or farmland of statewide importance to non-agricultural use.
- Conflict with existing zoning for agricultural use, or a Williamson Act contract.
• Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by PRC section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)).

• Result in the loss of forest land or conversion of forest land to non-forest use.

• Involve other changes in the existing environment which, due to their location or nature, could result in the conversion of farmland to non-agricultural use or forest land to non-forest use.

3.2.6 Environmental Impact Analysis and Mitigation

This section discusses potential agricultural or timber impacts from the proposed Program. A detailed discussion of each impact follows. Where there are potentially significant or significant and unavoidable impacts, mitigation measures are proposed and the residual impact after mitigation is determined.

3.2.6.1 Program Impacts

Impact AT-1. The Program could convert prime farmland, unique farmland, or farmland of statewide importance to non-agricultural use. Impacts would be less than significant.

Impact AT-1.1 – Direct Cultivation/Manufacturing. Per the California Health and Safety Code and California Business and Professions Code, medical cannabis is identified as an “agricultural product”. Therefore, outdoor cannabis cultivation would be considered an “agricultural product”, and as such would not convert associated FMMP farmland or prime agricultural soils to non-agricultural uses. Further, given that cultivation proposed by Program registrants would increase from the current 36 acres by between 8 acres and 43 acres, direct impacts from commercial cultivation of cannabis pursuant to the ordinance would not result in conversion of substantial amounts of FMMP-identified farmland, particularly Prime Farmland, Farmland of Statewide Importance, and Unique Farmland to non-agricultural use. Similarly, cannabis cultivation is unlikely to lead to conversions of prime soils as identified by the NRCS.

Indoor cultivation could include the use of permanent cement foundations, which could cover agricultural soils, or new buildings that would trigger significant infrastructure upgrades based upon the County’s Fire Code standards (refer to Impact AT-1.2 discussion below). Greenhouses constructed for cannabis cultivation and manufacturing could overlie agricultural soils, though SCC 13.10.636 limits use of flooring or impervious surfacing in greenhouses that impairs long-term soils capabilities. Both Program scenarios would prohibit construction of new greenhouses or structures for indoor cultivation in the Coastal Zone.
Further, Measure J includes requirements to restrict new construction on prime agricultural soils directly affected by construction of new structures. FMMP farmland is partially dependent on the quality of prime soils. General Plan Policy 5.15.3 prohibits the removal of indigenous prime soil used as a growing medium for container plants, which may include cannabis. This would further protect prime soils and associated FMMP land in the County; however, non-prime soils and timberlands that are not protected by these policies that are directed toward prime soils, may be directly impacted. Under both scenarios of the proposed Program, up to 190.1 acres of cannabis canopy (not including associated structures or utilities required under the Program under both scenarios) could be located in FMMP areas. Table 3.2-3 details the total areas of land that have the potential to be affected by up to 190.1 acres of new cannabis canopy under each Program scenario. However, cannabis cultivation under both Program scenarios would be a permitted agricultural use and would not convert or degrade FMMP lands, and impacts would be less than significant.

<table>
<thead>
<tr>
<th>Region</th>
<th>County Total</th>
<th>Proposed Project</th>
<th>More Permissive Project</th>
</tr>
</thead>
<tbody>
<tr>
<td>North Coast</td>
<td>11,186</td>
<td>5,577</td>
<td>5,693</td>
</tr>
<tr>
<td>Mountain</td>
<td>903</td>
<td>736</td>
<td>755</td>
</tr>
<tr>
<td>Urban</td>
<td>564</td>
<td>403</td>
<td>511</td>
</tr>
<tr>
<td>South County</td>
<td>29,017</td>
<td>25,675</td>
<td>26,441</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>42,843</strong></td>
<td><strong>32,393</strong></td>
<td><strong>33,400</strong></td>
</tr>
</tbody>
</table>

1"FMMP Agricultural Land" includes prime farmland, unique farmland, farmland of statewide importance, and farmland of local importance

2Also includes 1,172 acres of FMMP agricultural land within municipal boundaries

Source: Farmland Monitoring and Mapping Program.

Under both the Project and More Permissive Project, cannabis manufacturing must be subordinate and incidental to agriculture on CA and A zoned lands, and manufacturing within these zones would only be permitted if cannabis is cultivated onsite. It is estimated that approximately 20 new larger, higher-yield cannabis manufacturers may seek licenses on an annual basis from the County for the first five years of the Program (until the industry is assumed to stabilize), but that most of these manufacturers would not commonly seek licenses on agricultural lands given the utility demands and structural requirements, such as energy, water, and wastewater (see also, Section 3.14, Utilities and Energy Conservation). However, it is expected that smaller and medium-sized manufacturing uses would locate on agricultural lands with about one-half of the projected 300 businesses of these sizes being located on cultivation sites. Manufacturing would only occur on agricultural areas as an allowable ancillary use to agricultural cultivation with discretionary approval. Per Program requirements, manufacturing processes would require siting so as not to remove any production or areas of production, which would include soils (e.g., prime soils) that may be used for cannabis or other agricultural cultivation. Siting would be determined on a case-by-case basis to avoid areas of production, and if avoidance is not possible, then effects would be minimized. Any building sited on an agricultural parcel would require approval from the County Licensing Official and would be subject to the SCCC. The Licensing Official could deny applications that would impact agricultural and timber production or result in land conversion of such principal uses. However, as manufacturing is an accessory use on agricultural sites, subject to discretion, and would further be constrained to less than 5 percent of the parcel, comprising a small portion of total available land zoned for agricultural uses, impacts would be minor. As agricultural manufacturing activities are permitted as a secondary,
ancillary use to agriculture, impacts to both agricultural and timber resources would be less than significant.

Impact AT-1.2 – Indirect cultivation/manufacturing. Indirect impacts of the Program, including the required construction of up to 228 residential homes, utilities and infrastructure, and associated ancillary uses to receive a cannabis cultivation license under the Program, could potentially lead to conversion of FMMP or NRCS prime soils to non-agricultural uses. The County Fire Code for cannabis related activities within structures could require significant site improvements to provide onsite fire water tanks (up to 568 tanks of up to 120,000 gallons each) with related site pad clearing and grading, installation of a 20-foot wide road with turnaround, and defensible space vegetation management around a cannabis-related structure of up to 100 feet.

Based on review of the County’s license registration data, a portion of the up to 228 new homes and supporting roads, utilities and other structures required under the Program could be located on parcels that support prime soils or FMMP mapped agricultural land. The acreage of such potential conversion is unknown, but each home and support facilities could result in permanent land conversion due to the introduction of structures and improvements, as well as displacement of agricultural soils (e.g., non-prime) and forested lands. Such potential conversion of prime and non-prime soils and timberlands would be incremental with limited disturbance on each parcel, but potentially could cumulatively convert up to about 200 acres of prime or other farmland soils of statewide importance Countywide. However, under existing regulations for any agricultural site, single family homes and associated infrastructure is allowed (if on CA zoned parcels a discretionary development permit under a Level IV public notice process is required).

Also, given that implementation of the requirement for a home on each cultivation site on sites zoned A, CA, SU, and TP could involve substantial amounts of new grading, high cost of necessary site improvements, increased onsite constraints, and potential lack of availability of non-municipal water supplies, many cultivators may choose to relocate out of rural areas in favor of buying or leasing land or greenhouses in the South County Region or other areas that would not be subject to high cost or difficult requirements. Others may withdraw from the licensing Program and continue to operate as unlicensed facilities if another suitable location that meets the new standards cannot be found. The County Planning Department or Licensing Official may decide to deny applications for grading permits and licenses if excessive grading or site disturbance is involved, or if the proposed cannabis use contributes substantially to a loss in food production from agricultural areas in the County. Shifting cannabis cultivation and manufacturing activities out of mountainous rural areas would be a beneficial impact of the Program, as fire hazards to timber resources would be reduced. For these reasons, the Program’s impact on agricultural and timber resources is expected to be less than significant.

Impact AT-2. Proposed land uses under the Program could be incompatible with existing zoning for agricultural uses and Williamson Act contracts. Impacts would be less than significant.

Impact AT-2.1 – Direct Cultivation/Manufacturing. Direct impacts of cannabis cultivation would not convert farmland to non-agricultural uses. Per California Government Code Section 51201, an agricultural commodity under the Williamson Act means “any and all plant and animal products produced in this state for commercial purposes”, and an agricultural use consisting of “use of land, including but not limited to greenhouses, for the purpose of producing an agricultural commodity for commercial purposes”. Additionally, guidance from the Department of Conservation has stated that
cannabis is an agricultural product, under both the 2015 MCRSA statutes and the Williamson Act. Nothing in the Williamson Act prohibits the growth of cannabis on land enrolled in the Williamson Act. A city or county’s participation in the Williamson Act does not alter a local government’s authority to place conditions on crop types and agricultural practices allowed in areas under their jurisdiction. Both the Project and More Permissive Project would allow cannabis cultivation on lands primarily used for agriculture (A, CA, and AP) and those under Williamson Act contracts. Impacts of cultivation of up to 147 acres of cannabis canopy on CA zoned land under the Program’s ongoing licensing provisions would be accommodated within these areas. The difference in total Williamson Act land between the two Program scenarios is less than 1,500 acres of eligible area, with the greatest difference in the South County region (see Table 3.2-4). Since cannabis is identified as an agricultural product, thus fulfilling the primary use of existing zoning and Williamson Act contract lands, implementation of both the Project and More Permissive Project scenarios are anticipated to be less than significant for commercial cannabis cultivation.

Table 3.2-4  Williamson Act Contract Land within Program Scenario Areas (acres)

<table>
<thead>
<tr>
<th>Region</th>
<th>County Total</th>
<th>Proposed Project</th>
<th>More Permissive Project</th>
</tr>
</thead>
<tbody>
<tr>
<td>North Coast</td>
<td>19,369</td>
<td>8,974</td>
<td>9,211</td>
</tr>
<tr>
<td>Mountain</td>
<td>616</td>
<td>555</td>
<td>555</td>
</tr>
<tr>
<td>Urban</td>
<td>531</td>
<td>415</td>
<td>467</td>
</tr>
<tr>
<td>South County</td>
<td>34,108</td>
<td>29,019</td>
<td>29,910</td>
</tr>
<tr>
<td>TOTAL</td>
<td>55,164</td>
<td>38,962</td>
<td>40,123</td>
</tr>
</tbody>
</table>

Sources: California Department of Conservation; County of Santa Cruz Assessor’s Office, 2017.

Impact AT-2.2 – Indirect Cultivation/Manufacturing. Indirect impacts would occur from the potential installation of housing and utilities on sites designated for agricultural uses and within Williamson Act contract areas under both the Project and the More Permissive Project. When considering development on CA or A zoned property, one single-family dwelling and associated structures are permitted with appropriate levels of County approval and adherence to existing California Building Code requirements.

To protect agricultural land from potential conflicts with non-agricultural uses, a 200-foot agricultural buffer setback is required between habitable uses (includes outdoor areas) and commercial agricultural land. The buffer is measured from the proposed habitable area or structure to the property line of CA zoned land. Proposals to construct within the 200-foot buffer would be considered by the Agricultural Policy Advisory Commission (APAC) at a public hearing. Within Williamson Act contract lands, housing may be largely compatible, as parcels under contract are further restricted from development activities than parcels with solely CA, AP, or TP zoning. The contract typically allows for the construction of a single-family dwelling (a maximum of 2,500 square feet without additional permit review is typical) and other structures directly associated with the commercial agricultural use of the property, such as barns or other agricultural buildings. Home sites are allowed on contracted land but are limited in purpose and number and must be related to the agricultural use of the land. In addition, any home site on land subject to a Williamson Act contract must follow local uniform rules or ordinances. Proposed uses or structures on parcels under contract are subject to a Compatibility Review (State Government Code 51238.1).
Overall, indirect impacts to existing zoning for agricultural land and Williamson Act contract lands under both Program scenarios would be less than significant.

**Impact AT-3. The Program could substantially conflict with existing zoning for or cause rezoning of forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by PRC section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)) to a non-allowable use. Impacts would be less than significant.**

**Impact AT-3.1 – Direct Cultivation/Manufacturing.** Forest land under PRC 12220(g) includes all forested land that can support 10 percent native tree cover of any species and as further described within Section 3.1, *Aesthetics and Visual Resources*, Section 3.4, *Biological Resources*, Section 3.9, *Hydrology and Water Quality*, and Section 3.11, *Public Services*, in the context of forest land. Associated analysis and mitigations from these sections would be required to protect forest land within the County. These sections also provide for the protection of forest habitat, water resources, geologic stability, and aesthetic integrity within the County. Protection of forest land for use as a timber resource (for commercial purposes), is assisted by General Plan Policy 5.12.8, which encourages rezoning for timber resource land eligible\(^3\) for TP to TP zoning, as discussed below, and neither the Project or More Permissive Project would conflict with this existing process. Additionally, in the coastal zone, compliance with SCCC Chapter 16.34 would provide protection to significant trees and forest communities (forest land) on private and public property not yet used for agricultural or timber production. In the coastal zone, compliance with SCCC Chapter 16.34 would provide protection to significant trees and forest communities (forest land); the Chapter also provides exemptions for the removal of tree crops pursuant to agricultural operations (16.34.090(d)), in which the removal is necessary for new or existing agricultural purposes consistent with other County policies and that mitigation of visual impacts would be provided (16.34.060(h)). Therefore, while allowed, some actual forest land may be lost to non-forest uses after approval per a public hearing by a Zoning Administrator.

Timberland under PRC 4526 is generally protected by the Forest Practice Act and associated THPs or NTMPs. The mechanisms for continued timberland conversion to cannabis cultivation with the implementation of the Program may largely come from requests for Less-Than-Three-acre Conversions on TP zoned timberlands. Conversion requests to CalFire require the applicant to state the proposed alternate use (bona fide intent) for the site once the timber is removed. Although conversions would be required for any application that involves land in the timbered area of the property, for lands that have not been timbered, conversion permits may be exempted. Given cannabis cultivation would involve an agricultural use, permitted on TP zoned lands, conversion of forested lands upon a holding outside of historically or currently timbered lands could nonetheless occur.

If a conversion request states that the bona fide intent for conversion is cannabis cultivation, it is necessary for CalFire to have accurate information to determine if the property would qualify for a Cultivation Permit based on zoning, setbacks, and other provisions outlined in the Program. Without this information CalFire could inadvertently authorize conversion of timberlands in area that ultimately may not fall within the permitting criteria. To avoid this circumstance, existing County

\(^3\) Includes the evaluation of proposed land divisions and residential development permit applications on parcels larger than 20 gross acres designated Timber Resource on County mapping, but not zoned TP, for timber resource potential. This would apply the TP land division and residential density requirement policies for any parcel found to have timber resources equivalent to TP parcels.
process states the conversion must comply with applicable County ordinances, such as riparian, significant tree (coastal zone only), grading, sensitive habitat, erosion control, etc. Additionally, the County has both review and approval authority over the conversion. The conversion must be signed off by a representative of the County, making the determination that the proposed conversion is for a permissible activity and that the necessary permits have been obtained. Ultimately, actions within timbered areas would need approval from the Zoning Administrator or approval by County staff and a site visit (permitted uses in CA district do not require approval as it is the primary use of the land, while discretionary uses within a CA district may require public notice and/or require a public hearing by the Zoning Administrator). The total eligible timberland areas accounted for under each Program scenario are summarized in Table 3.2-5, which indicates that the More Permissive Project would have a greater area of timberland coverage, notably in the North Coast and Mountain regions.

<table>
<thead>
<tr>
<th>Region</th>
<th>County Total</th>
<th>Proposed Project</th>
<th>More Permissive Project</th>
</tr>
</thead>
<tbody>
<tr>
<td>North Coast</td>
<td>28,103</td>
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<td>5,051</td>
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<tr>
<td>Mountain</td>
<td>45,589</td>
<td>36,754</td>
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<td>Urban</td>
<td>5,148</td>
<td>3,588</td>
<td>4,153</td>
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<tr>
<td>South County</td>
<td>11,552</td>
<td>10,346</td>
<td>10,484</td>
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<tr>
<td><strong>TOTAL</strong></td>
<td><strong>90,647</strong></td>
<td><strong>52,621</strong></td>
<td><strong>57,833</strong></td>
</tr>
</tbody>
</table>

Source: Santa Cruz County GIS Data, 2017.

Both the Project and More Permissive Project scenarios would require a license for any commercial cannabis cultivation on TP zoned lands, permitting new operations on TP-zoned land that are not a primary existing use (see Table 3.2-6). The SCCC currently allows agricultural uses on portions of the land not under timber production, and conversion of timberland to agricultural uses not exceeding 10 percent of the total of the timber area on the parcel after approval by the Zoning Administrator, which would accommodate both the Project and More Permissive Project scenarios. As discussed above, the amount of conversion is also subject to acreage limitations under the Forest Practices Act. Overall, due to the existing requirements of the County General Plan, SCCC, California Forest Practice Rules, and California Department of Conservation, impacts to forest land, timberland, and lands zoned for Timberland Production would be less than significant for both Program scenarios.

<table>
<thead>
<tr>
<th>Region</th>
<th>County Total</th>
<th>Proposed Project</th>
<th>More Permissive Project</th>
</tr>
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<td>North Coast</td>
<td>27,332</td>
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<td>Mountain</td>
<td>31,828</td>
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<tr>
<td>Urban</td>
<td>2,790</td>
<td>2,406</td>
<td>2,533</td>
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<tr>
<td>South County</td>
<td>9,345</td>
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<tr>
<td><strong>TOTAL</strong></td>
<td><strong>71,295</strong></td>
<td><strong>36,105</strong></td>
<td><strong>45,156</strong></td>
</tr>
</tbody>
</table>

Source: Santa Cruz County GIS Data, 2017.

For cannabis product manufacturing, discretionary permit review would be required for manufacturing and associated structures on timberland, usually including a Zoning Administrator hearing. Additionally, with the exception of limited ancillary uses of detached single family homes for cannabis home occupations, manufacturing and production activities under the proposed manufacturing ordinance may only occur as long as cannabis cultivation and associated licensing
occurs onsite. No timber conversion permits would be allowed for the specific accommodation of manufacturing practices.

Because agricultural manufacturing processes are considered an ancillary use to agricultural land uses such as the cultivation of crops, and agricultural uses are permitted on lands that may be designated for timber, manufacturing in these areas would not substantially conflict with existing zoning or require rezoning of forest land or timberlands. Therefore, the proposed manufacturing component under both the Project and the More Permissive Project would not substantially conflict with forest land or timberland designated areas, and impacts would be less than significant.

**Impact AT-3.2 Indirect Cultivation/Manufacturing.** Indirect impacts to forest land, timberland, and TP zoned land would be limited in scope, as all land designations allow for some conversion of land for ancillary uses to support the primary use of the land, such as for commercial cannabis cultivation. For forest land, as discussed above, associated analysis and mitigations from the sections throughout the EIR would be required to ensure protection of forest land within the County.

Timberland under THPs and NTMPs are subject to State limitations under the Forest Practices Act and would necessitate compliance with the California Forest Practice Rules. The Project would necessitate housing, utilities, and roads for properties in forest land areas.

TP zoning regulations currently authorize accessory uses such as grazing and other agricultural uses provided they do not significantly detract from the use of the property or inhibit the growing and harvesting of timber. TP zoning also provides for limited conversion of forest land for residential, recreational, agricultural, and timber related uses. "Conversion" is subject to acreage limitations under the Forest Practices Act and County zoning regulations. County Planning and Building Services would additionally participate in reviewing timber conversions, and in doing so provide information to CalFire as to whether a Cultivation License has been issued corresponding with the intent for conversion as stated in the conversion request. Therefore, Program impacts under both the Project and More Permissive Project would be less than significant.

**Impact AT-4. The Program could result in the removal of trees and conversion of timberland that may be used for timberland resources. Impacts would be less than significant with mitigation.**

**Impact AT-4.1 – Direct cultivation/manufacturing.** Direct impacts of the Program on timber resources would involve the removal of trees, as provisions of the Program allow for limited removal of timberlands to use for agricultural (cannabis cultivation) operations and ancillary facilities. This type of tree removal (as contrasted with timber harvest) is considered "land clearing" under SCCC Chapter 16.22, Erosion Control, and subject to the requirements for a Land Clearing Permit if tree removal and clearing involve more than one acre. As described in Impact AT-3, land use and zoning allowances permit limited commercial agricultural operations on lands that support timberland and timber production; however, forested areas outside of historically or currently timbered lands allow agricultural activities as a principally permitted use.

Outdoor grows are expected to be prevalent in the Mountain and South County Regions, as these regions have a better climate for growing and contain the greatest acreage and number of parcels eligible for cultivation, where 38 percent of the registrant-provided cultivation sites would be in the Mountain Region and 27 percent would be in the South County Region under the Program. The Program requires that if cannabis cultivation occurs outdoors, the growing area must be fully secured and enclosed within an opaque fence at least 6 feet high. Installation of the fence in timberland areas...
may require additional tree removal that may reduce the ecological and resource value of timberland areas. MM AV-1, ensuring the appropriateness of proposed fencing, would ensure fences are sited to avoid tree removal during cultivation site licensing and permitting.

If all potential cannabis cultivation occurred within timber areas, of the approximate 90,647 acres of timberland in the County, this would represent less than 0.01 percent of the County’s timber resource area. The conversion of timberland area to agricultural cannabis operations is not anticipated to be extensive, as a maximum of 79.1 acres of cannabis canopy could occur within the County by registrant licensees under the Program, including 34.8 acres of new cannabis canopy. Most projected cultivation, 147 acres of the 190.1 projected total, would occur on CA land which is mostly located in South County, mostly within greenhouses, and outside of forested lands. As stated in the preceding Impact AT-3 discussion, impacts to timbered areas of forested lands would be less than significant, due to the state and County policies and regulations.

Direct impacts from the proposed manufacturing could result in the removal of trees. About one-half of the manufacturing activities is projected to occur on cannabis cultivation sites, with the other half dispersed throughout the County on eligible sites. The proposed Program provides that new structural development associated with cannabis manufacturing must be clustered within 200 feet of other buildings on the property to facilitate timber harvesting and to preserve the rural character of the land. A discretionary permit with a Zoning Administrator hearing would be required for any manufacturing structures on timberland, and the application review and permit approval process would can ensure protection of the timber resource. However, if existing property buildings are located immediately adjacent to forest resources that may support timber production; installation of new structures may result in the removal of these timber resources. As such, the potential for substantial loss of trees that contribute to overall County timber resources would be high under the Program. Therefore, direct impacts from cannabis cultivation and manufacturing on timber resources would be potentially significant.

Mitigation Measures

**MM AT-4.1a. Siting Allowance for New Manufacturing Structural Development.** To protect timber resources that may be located adjacent to existing property buildings, the proposed SCCC Chapter 7.132 shall be revised prior to adoption by the Board of Supervisors, to allow for the siting of new manufacturing structures further away than 200 feet of other property buildings if the closer location is not feasible, through approval of a discretionary development permit. The alternate location may only be permitted if it would not adversely affect existing natural resources or timber resources (i.e., an open cleared area).

**Requirements and Timing.** SCCC Chapter 7.132 shall be revised prior to adoption of the Program.

**Monitoring.** The Licensing Official shall determine that a site adheres to MM AT-4.1.1 before issuance of a license.

**MM AT-4.1b. Land Clearing Restrictions.** To protect timber resources that may be located adjacent to existing property buildings, the County shall amend SCCC Chapter 16.22, Erosion Control, to require a land clearing permit for licensed cannabis operations for any clearing of more than 0.25 acre of land.
Requirements and Timing. SCCC Chapter 16.22 shall be amended prior to adoption of the Program.

Monitoring. The Licensing Official shall determine that a site adheres to MM AT-4.1.2 before issuance of a license.

Post-Mitigation Level of Impacts

With implementation of MM AT-4.1.1, and MM AT-4.1.2, residual direct impacts to timberland that may be used for timberland resources would be less than significant with mitigation.

Impact AT-4.2 – Indirect Cultivation/Manufacturing. Indirect impacts of the Program on timber resources would involve the removal of some trees, as both Program scenarios require the installation of ancillary facilities such as residences, utilities, and roadway access. The construction of up to 228 new onsite residential units required to carry out cannabis cultivation on a site, along with any associated roads, utility infrastructure, and site improvements to support onsite cannabis cultivation operations, may require the removal of trees onsite. The construction of homes and support structures, including site improvements to meet County Fire Code, would potentially alter the existing character near each cultivation site. Construction of these residences and associated infrastructure could involve grading for building pads, roads, and driveways, in addition to grading and site preparation activities required for cannabis cultivation. Such grading and site preparation would have the potential to change the topography of the site and may be visible from scenic roads or public vistas. With the installation of utilities on cultivation sites without existing utility infrastructure, trees may need to be removed to accommodate the installation.

Potential acreage and scale of development for the required onsite residential units is conservatively assumed to be the size of a typical rural residential development in the County at approximately 0.5 to 1.0 acre per residence, including roads, driveways, utilities, and outbuildings, representing up to 228 acres of potential indirect development associated with the Program Countywide. However, under the County Building Code, a single-family home can meet all applicable requirements and be only about 300 square feet in size. If all new residential and ancillary development occurred in the approximate 90,647 acres of timberland in the County, this would comprise a limited area representing less than 0.01 percent of the County's timber resource areas. Therefore, Program impacts under both the Proposed Project and More Permissive Project would be less than significant.

3.2.6.2 Summary of Project Impacts and Proposed Mitigation Measures

Table 3.2-7 provides a summary of the Program impacts related to agriculture and timber production resources and proposed mitigation measures.
Table 3.2-7  Summary of Agricultural and Timber Resources Impacts

<table>
<thead>
<tr>
<th>Agriculture and Timber Impacts</th>
<th>Level of Significance</th>
<th>Mitigation Measures</th>
<th>Post-Mitigation Level of Significance Project</th>
<th>More Permissive Project</th>
</tr>
</thead>
<tbody>
<tr>
<td>Impacts from Commercial Cannabis Cultivation and Cannabis Product Manufacturing</td>
<td></td>
<td></td>
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<tr>
<td>Impact AT-1. The Program could convert prime farmland, unique farmland, or farmland of statewide importance to non-agricultural use. Impacts would be less than significant.</td>
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<tr>
<td>Direct</td>
<td>Less than Significant</td>
<td>None required</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
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<tr>
<td>Indirect</td>
<td>Less than Significant</td>
<td>None required</td>
<td>Less than significant</td>
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<tr>
<td>Impact AT-2. Proposed land uses under the Program could be incompatible with existing zoning for agricultural uses and Williamson Act contracts. Impacts would be less than significant.</td>
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<tr>
<td>Direct</td>
<td>Less than Significant</td>
<td>None required</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>Indirect</td>
<td>Less than Significant</td>
<td>None required</td>
<td>Less than significant</td>
<td>Less than significant</td>
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<tr>
<td>Impact AT-3. The Program could substantially conflict with existing zoning for or cause rezoning of forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by PRC section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)) to a non-allowable use. Impacts would be less than significant.</td>
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<tr>
<td>Direct</td>
<td>Less than Significant</td>
<td>None required</td>
<td>Less than Significant</td>
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<tr>
<td>Indirect</td>
<td>Less than Significant</td>
<td>None required</td>
<td>Less than significant</td>
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<tr>
<td>Impact AT-4. The Program could result in the removal of trees and conversion of timberland that may be used for timberland resources. Impacts would be less than significant with mitigation.</td>
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<tr>
<td>Direct</td>
<td>Potentially Significant</td>
<td>MM AT-4.1a. Siting Allowance for New Manufacturing Structural Development. MM AT-4.1b. Land Clearing Restrictions</td>
<td>Less than significant with Mitigation</td>
<td>Less than significant with Mitigation</td>
</tr>
<tr>
<td>Indirect</td>
<td>Less than Significant</td>
<td>None required</td>
<td>Less than significant</td>
<td>Less than significant</td>
</tr>
</tbody>
</table>
3.2.7 Secondary Impacts

Impact AT-5. The Program could convert prime farmland, unique farmland, or farmland of statewide importance to non-agricultural use; propose land uses that are incompatible with existing zoning for agricultural uses and Williamson Act contracts; substantially conflict with existing zoning for or cause rezoning of forest land, timberland, or timberland zoned TP to a non-allowable use; and result in the removal of trees and conversion of timberland that may be used for timberland resources. Impacts would be significant and unavoidable.

Impact AT-5 – Secondary Cultivation/Manufacturing. Currently, there is a significant but unquantified amount of illegal cannabis cultivation and manufacturing occurring in the County (see Section 3.0, Introduction and Approach to Analysis). There is potential for expansion of the existing, baseline illegal activity as a result of the Program in that any licensing program may create the perception that, regardless of any restrictions and limitations of the program, there is opportunity for new cultivation and manufacturing businesses to become established and ultimately licensed within the County. This perception could lead to new cultivation and/or manufacturing activity that may not be licensed. Such unregulated cultivation and manufacturing would occur without adherence to existing restrictions for agricultural and forestry practices, setbacks, County Building Code compliance, or protection of FMMP farmland. Potential barriers to legal cultivation coupled with economic requirements such as taxation rates; development of a residence on site, infrastructure improvements, road improvements, minimum parcel sizes and required mitigation measures and other requirements, may reduce participation in the Program and increase the rate of unlicensed cultivation over the life of the Program.

The location of unlicensed cultivation sites cannot be predicted with any certainty; such cultivation could occur in any of the countywide regions and could continue or expand in areas unsuitable for cultivation. Given its illegal or unpermitted nature and need for concealment from enforcement, such activities may occur in heavily forested areas with steep slopes, involving clear-cutting of trees and stepped mountainside grading. Vegetation clearing, grading, and building support facilities such as water supply facilities and trails would increase the amount of tree removal without regulatory oversight or protections. Operational impacts associated with soil tilling, watering, weed control, and other activities may affect soil quality and damage to surrounding agricultural operations from potential drainage runoff. These impacts could occur Countywide; although, impacts associated with soil or land degradation from clear-cutting or mountainside grading that may eliminate prime soils would have higher potential to occur on the steep slopes in the Mountain and North Coast Regions where the most timberland exists, and are areas known for existing cannabis cultivation and difficult detection and enforcement. Unregulated cannabis cultivation may also result in the degradation of soils identified as important farmland for the state or local level, especially within the South County and North Coast Regions, with the largest potential for continued adverse impacts occurring in the North Coast and Mountain Regions due to the greater amount of known unregulated operations in these areas. Therefore, secondary impacts related to conversion of important farmland would be potentially significant for both the Project and More Permissive Project.

Secondary impacts would also consist of illegal operations out of compliance with existing zoning or with Williamson Act contracts. Unregulated cannabis cultivation may result in the degradation of soils designated for commercial agricultural usage and Williamson Act contract lands, primarily within the South County Region, due to the greater amount of designated commercial agricultural land in the
County. However, given that unlicensed cannabis cultivation would still primarily comply with existing commercial agricultural regulations and state Williamson Act requirements due to being an agricultural use, and with existing restrictions on pesticides and fertilizer controls as discussed in Section 3.8, Hazards and Hazardous Materials, secondary impacts related to unlicensed cannabis cultivation and commercial agricultural production on Williamson Act lands under the Program would not likely manifest. Additionally, should a landowner not comply with their Williamson Act contract, enforcement actions could include agency initiated non-renewal of the contract and related tax penalties. Therefore, secondary impacts on Williamson Act contracted lands would be less than significant.

Additional secondary impacts would occur due to continued illegal or unpermitted cannabis cultivation activities in forest land and timberland areas of the County without regulatory oversight for environmental protection. In the existing baseline condition, substantial cannabis cultivation occurs in remote, isolated settings, typically, in areas which are naturally forested. These practices have resulted in substantial changes to forest lands including tree removal, land clearing, water diversion, grading and other activities which together constitute conversions of forest lands to non-forest use. Without the ability to regulate unlicensed cannabis activities, these secondary impacts would be potentially significant for both the proposed Project and More Permissive Project.

Without an effective method to track and enforce unlicensed cannabis cultivation and manufacturing within the County, the Program may result in an unknown quantity of removed trees and conversion of timberland to other uses such as agriculture. Therefore, due to the potential for an unknown quantity of trees and associated forest land removed, secondary impacts would be potentially significant.

**Mitigation Measures**

**MM AT-1.3a. Sustained Enforcement Program.** To address continued unlicensed cannabis cultivation within the County that may adversely affect agricultural and timberland resources, the Cannabis Licensing Office, in consultation with the Planning Department and County Sheriff’s Office, shall recommend to the Board of Supervisors an Unlicensed Cannabis Cultivation and Manufacturing Enforcement and Compliance Program. The enforcement program shall have sustainable funding and feasible implementation within the first year of adoption of the proposed Program to address enforcement of unlicensed cannabis cultivators and manufacturers. The funding and implementation program shall be subject to approval by the Board of Supervisors. Within two years of adoption of the proposed Program, funding shall be determined with assistance from the Annual Survey and Monitoring Report described in MM AT-1.3b and appropriately balanced with other County and/or local community priorities to provide a feasible level of funding for an effective ongoing enforcement program.

**Requirements and Timing.** The Cannabis Licensing Office and Planning and Development Department shall develop and recommend the provisions of the Unlicensed Cannabis Cultivation and Manufacturing Enforcement and Compliance Program prior to adoption of the Program. The County shall allocate funding and implementation resources for one year following Program adoption.

**Monitoring.** The Cannabis Licensing Office shall monitor enforcement programming, in coordination with the Planning and Development Department and the County Sheriff’s Office.
MM AT-1.3b. Annual Survey and Monitoring Report. To ensure that licensed cultivators are abiding by license and permit conditions, and to identify and take actions to address illegal cannabis activities, comprehensive annual survey and monitoring activities shall be conducted, and conveyed in an Annual Survey and Monitoring Report to the Board of Supervisors, with recommendations regarding enforcement staffing and resources. At least 50 percent of licensed cultivation and manufacturing sites shall be evaluated and reported upon each year in an Annual Survey and Monitoring Report. The survey shall be implemented by the Cannabis Licensing Office once per year, and the list of monitored and surveyed items shall be approved by the County Cannabis Licensing Official, Planning Director and Agricultural Commissioner within one year of adoption of the proposed Program. At minimum, the Annual Survey and Monitoring Report shall include quantitative recordings of the following items, with analysis of both licensed and unlicensed illegal activities:

- Location of the cultivation or manufacturing site;
- Type of cultivation (indoor/ outdoor/ greenhouse/ etc.) and/or manufacturing (volatile/ non-volatile/ etc.) practices;
- Total square footage of disturbed ground associated with cannabis cultivation and manufacturing; and
- Total loss of any adjacent timber resources or recent habitat removals (including, but not limited to, damage to waterways, indigenous wildlife, understory forest vegetation, or felled trees).

At completion of the annual survey and monitoring efforts, the data shall be assembled into an Annual Report available for review by the County Board of Supervisors. The Annual Report shall contain recommendations regarding enforcement and staffing resources, to provide a feasible level of funding for an effective enforcement program.

Requirements and Timing. The Cannabis Licensing Office and Planning and Development Department shall conduct an annual survey and prepare a report to the Board of Supervisors annually. The County shall allocate funding and implementation resources for the survey on an ongoing basis during Program implementation.

Monitoring. The Cannabis Licensing Office shall perform the survey and prepare the annual report, in coordination with the Planning and Development Department and the County Sheriff’s Office.

Post-Mitigation Level of Impacts

With implementation of MMs AT-1.3a and AT-1.3b, unregulated cannabis cultivation and/or manufacturing would be reduced over time either through enforcement/closure of grow sites, and residual secondary agricultural and timber resource impacts would be reduced, but it cannot be ensured that unlicensed activities would be reduced to a less than significant level. Though both licensed and unlicensed cannabis cultivation and manufacturing would be tracked and appropriately enforced by the County to the extent the sites are identifiable, including ensuring that licensed operations are compliant with requirements, there is a high likelihood that secondary impacts would continue to occur due to the nature of County enforcement and remote and unknown locations of some existing unlicensed cultivation sites. Therefore, while an adaptive plan can be made to track and enforce licensed and unlicensed cannabis cultivators and manufacturers, the comprehensive
protection of existing agricultural and timber resources cannot be ensured. Therefore, secondary impacts to agricultural and timber resources would be **significant and unavoidable**.

### 3.2.8 Cumulative Impacts

As described in Section 3.0, *Introduction and Approach to Analysis*, the cumulative setting for the Program involves a variety of planning programs in the region of Santa Cruz County along with regional growth and ongoing development under the County’s General Plan, including the pending General Plan Update efforts and the Agricultural Code Update. Program approval would contribute to cumulative agricultural and timberland impacts associated with pending and future growth and development projects Countywide, including pending and approved timber production plans and changes in agricultural crops and activities over time.

Cumulative direct and indirect impacts associated with the Program's cultivation and manufacturing activities would include potential exposure to agricultural and timber resource conflicts associated with the combined new cannabis canopy by registrants seeking licenses, of 8 acres up to 34 acres, with additional acreage for support development, as well as development of structures to support cannabis cultivation and manufacturing activities. Up to 147 acres of cannabis cultivation is also projected to occur on CA zoned lands, mostly in South County. Additionally, under the Program, additional development in the form of housing and utilities would be required on a range of lands designated for agricultural and timber production. Impacts on agricultural and timbered areas of forested lands would be **less than significant**, due to existing requirements of the County General Plan, SCCC, California Forest Practice Rules, and California Department of Conservation. As impacts from the Program are fully mitigated, these cumulative effects would not be considerable and, therefore, would be **less than significant**.