

#3
LATE
DIST



www.goodfarmersgreatneighbors.com

February 14 2022

VIA EMAIL Clerk of the Board sbcob@countyofsb.org
805-568-2058

**TO: Supervisor Joan Hartman, Chair
Members, Santa Barbara County Board of Supervisors**

**RE: Item # 3, 22-00132; Proposed Recommendations to Chapter 50 -
Licensing of Cannabis Operations (attachment B - Chapter 50
amendment redline)**

**“Sunset Date of June 30th 2022 for all existing legal non-conforming uses that
have an approved land use entitlement and secured a place on the Eligible
Business License Applicants List.”**

First and foremost we appreciate the purposeful direction of the Board of Supervisors over the past three years to help stabilize and normalize the cannabis industry, especially through the demanding and necessary work of the County’s Department of Planning and Development.

North County Farmers Guild and Good Farmers-Great Neighbors are pleased to support the majority of your proposed amendments to Chapter 50. We appreciate that you have incorporated some feedback from cannabis business and community leaders.

However, we would like to express our real concern for arbitrarily identifying a sunset date (June 30, 2022) that will impose significant harm on operators at no fault of their own.

Please consider seriously the following concerns and recommendations as they relate to licensing and the proposed sunset date of June 30th 2022.

- Without providing the **CEO Office or Planning Director** discretion of the approval process - cannabis farmers actively pursuing review, site visits, preliminary approvals, and final approvals from the various cross-functional county departments will inevitably fall through the cracks. The lack of concurrent processes remains a significant concern for all applicants and operators.
- The County's sunset dates should **align with the State's process transitioning from provisionals to annual licenses**. That said, the DCC has already fallen behind, only 30% of provisional licenses have been processed to receive an annual license. An arbitrary date of **June 30, 2022** by the County, will only contribute to uncertainty and have the unintended harm of shutting down local farmers in good standing with the state waiting in the queue for approvals.
- Moreover, the cannabis supply-chain is in dire straits and farmers are experiencing unimaginable price compressions that undermine the health of the industry to remain sustainable, especially if the state does not execute immediate *"Tax and Regulatory Relief Measures"*.
- A premature date mandated by the County could drive massive workforce layoffs and contract terminations with local suppliers.
- Finally, Anti-Cannabis forces will only weaponize these shortened processes to continue to disrupt and distract operators who are fully complying with every local office of oversight. The use of these delay tactics have cost the operators dearly and disheartened many at County government.
- Ideally a sunset date in **early fall of 2023** should be considered as the best solution to help County staff make informed assessments of existing cannabis operators.

With the advent of federal legalization of cannabis being passed by the US Congress on the horizon it is vital that policies considered by the County do not have unintended consequences that places our very own cannabis farmers at a competitive disadvantage when interstate commerce is legal.

Please don't hesitate to call me at 917-886-7989 for additional information.

Respectfully Submitted,

Sara Rotman, Co-Founder

John De Friel, Co-Founder