

Public Comment

Ramirez, Angelica

From: Steinfeld, Amy <ASteinfeld@bhfs.com>
Sent: Monday, February 14, 2022 10:36 AM
To: sbcob
Subject: Comment Letter for 2/15 Hearing: Dept. Agenda No. 3 (Chapter 50 Cannabis Amendments)
Attachments: BOS Letter re Chapter 50 Amendments(23750924.1).pdf



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Dear Clerk of the Board,

Please find a Comment Letter on behalf of the North County Farmer's Guild for the Feb. 15 Hearing: Dept. Agenda No. 3 (Chapter 50 Cannabis Amendments).

Best regards, Amy Steinfeld

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February 14, 2022

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**Santa Barbara County Board of Supervisors
123 East Anapamu Street
Santa Barbara, CA 93101**

VIA EMAIL: sbcob@countyofsb.org

RE: Dept. Agenda, No. 3: Amendments to Chapter 50 of the County Code - Licensing of Cannabis Operations

Dear Chair Hartmann and Honorable Supervisors:

The North County Farmers Guild appreciates the opportunity to comment on the proposed Chapter 50 amendments. The Guild represents many of the outdoor cannabis farmers in Santa Barbara County. Our organization represents a new crop for Santa Barbara County and California farmers — outdoor, sun grown, legal cannabis. We are dedicated to making Santa Barbara County a model of community-friendly, sustainable farming.

A. Processing Should be Removed from Cultivation Cap:

First, we support the County removing **processing** (drying, trimming, curing) from the cultivation cap and staff's proposed amendments to Section 50-7. The lack of local processing has hobbled the industry and has resulted in farmers shipping their product hundreds of miles to out-of-county processing facilities, leading to loss of County tax-income and increased vehicle miles traveled. This amendment would allow the County to collect the additional tax revenue generated by processing activities and reduce the environmental impacts associated with interregional shipping. Furthermore, the Cannabis Ordinance already mitigates for odors associated with processing activities. For the aforementioned reasons, we strongly support the County's proposed processing amendments to Chapter 50.

These amendments would benefit the County in the following ways:

- **Retain tax revenue within the County.** Currently, substantial revenue from processed product is diverted out of the County because of the lack of processing facilities to meet the rising local demand. Additional local processing facilities could generate millions in revenue for drying, trimming and packaging services.
- **Environmental benefits.** Increasing the number of processing facilities to serve in-county cultivators will decrease the overall vehicle miles traveled ("VMT") associated with cannabis cultivation and processing. Sixty to 70 percent of the weight of wet cannabis is lost in the drying process, so wet plants being shipped over longer distances is inefficient and increases greenhouse gases emissions associated with this industry.

- **Protect the quality and value of cannabis.** Increased shipping times impacts the overall quality of cannabis flowers. Lower quality flower yields a lower price per pound which translates into revenue losses for the County. Allowing more local processing facilities will allow the quality of cannabis product to be preserved and aid in supporting Santa Barbara County's newest appellation.

B. Licenses Should be Transferable with County Review and Approval:

Second, we support the proposed amendments that will allow Business Licenses to be freely transferred. A cannabis farmer should be able to change ownership or accept new investment, and continue operating while the new application is pending if they are compliant with their land use entitlement and Business License. Likewise, the new operator(s)/owner(s) should be assured that they are not at risk of losing their spot on the Eligibility List or Wait List, and associated investment, if they comply with the land use entitlement and meet the County's and State's stringent disclosure requirements and background checks.

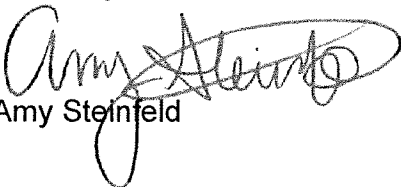
Many cannabis applicants were not aware that it would take multiple years to obtain entitlements or that their projects would be subjected to appeals. Accordingly, many applicants are now focused on raising capital and bringing new investments into the County to develop responsible, sustainable projects. Other permittees have decided to sell their farms due to unforeseen circumstances and are looking to recoup their investments for their families. For these reasons, we strongly support the proposed amendments to Sections 50-22 and 50-23. These changes are also consistent with the State's requirements that all new Owners and Financial Interest Holders be disclosed to the State's Department of Cannabis Control and fully vetted. There are ample checks and balances by the County and State to ensure that existing projects can continue to operate compliantly while new owners/partners are being carefully and openly vetted.

C. Business License Deadlines Should be Extended:

The County's business license process is onerous and time-consuming, plus the required departmental site visits have been delayed due to COVID and many operators have been unable to move forward with construction due to appeals and pandemic-related supply shortages. We therefore respectfully request that the sunset date for Business license approval align with the state and that the date for ceasing operations should be the Fall of 2023. The County should not make operators cease their operations before their state licenses expire, as this would create unnecessary pressure on both operators and county officials.

Thank you for your time and attention to these important matters.

Sincerely,


Amy Steinfeld