

A-4



916 Anacapa Street,
Santa Barbara, CA 93101



February 27, 2022

County of Santa Barbara Board of Supervisors

RE: 3-1-22 Hearing: Item A-4 Chapter 50 Second Reading

Dear Chair Hartmann and Board:

Citizens Planning Association requests that you refrain from adopting the proposed amendments to Chapter 50, set for Second Reading and adoption at your 3-1-22 meeting. We are concerned that the confusion and significant impacts that may result from these amendments will be difficult to undo.

In the letter CPA submitted for the first reading 2-15-22, we emphasized concerns about the almost incomprehensible language of these proposed amendments to a licensing program that is already challenging for even the most seasoned land-use veteran to interpret. Anticipated long range planning amendments, as well as appeals at all levels, are an almost weekly reminder that communities throughout the County continue to have concerns about the County's *existing* ordinance. These amendments to Chapter 50 would only exacerbate these concerns and do so in the absence of environmental review or Coastal Commission certification.

CPA members have heard from residents who reside in communities near the foothills and City of Goleta, Gaviota Coast, Toro Canyon, and along the scenic highways in North and Mid County who are alarmed at the prospect of stand-alone cannabis processing facilities being permitted with a simple LUP.

Citizens Planning Association was involved in and commented on the original cannabis ordinance when it was adopted in 2018. Manufacturing and distribution activities were restricted to certain zones, and the idea that stand-alone processing facilities would be permitted other than as accessory to cultivation was *never* contemplated. In fact, a certain percentage of product must be cultivated on the parcel in question for processing or manufacturing activities to take place. That fact would seem to preclude isolating processing activities from the cultivation cap.

Cannabis industry representatives proposed this idea only when the cultivation caps were close to being reached. CEO staff stated they met privately with cannabis industry groups who suggested the amendments. It is understandable that industry would seek the further monetization of land use. However, in your roles as representatives of your constituents, it is incumbent upon you to analyze the intent and consequences of increased development objectively and carefully.

Please allow for full and public vetting of these proposed changes and their implications for the Land Use and Development Code and Article II. Perhaps through public meetings, where residents may submit questions of County planners, a better understanding of the intended benefits vs. likely detriments might be better understood by both decision-makers and the public.

Sincerely,

Marell Brooks

President

Citizens Planning Association