

# LAW OFFICE OF MARC CHYTILO, APC

A PROFESSIONAL CORPORATION

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## ENVIRONMENTAL LAW

May 21, 2024

Chairperson Steve Lavagnino  
Santa Barbara County Board of Supervisors  
105 E. Anapamu Street, Fourth Floor  
Santa Barbara, California 93101

Re: Sullivan Appeal of Moriarity Cannabis Cultivation Project, 6980 Cat Canyon Road, 23CUP-00000-00014, 22APL-00000-00008

*Chair Lavagnino and Honorable Supervisors:*

This office represents James N. Sullivan, the single Appellant in this matter. This appeal raised concerns primarily focused on the water demand for the Moriarity Cannabis Cultivation Project, 6980 Cat Canyon Road, 23CUP-00000-00014 (“Project”), the Project’s reliance on groundwater for its water supply, and the impacts of processing in rural Cat Canyon.

In response to these concerns and other factors, the Applicant has elected to scale back the Project and its permit considerably, eliminating all processing from the site, removing any cannabis activities to the north of Cat Canyon Creek, which in turn obviate roadway improvements to Long Canyon Road and a proposed box culvert over a small ephemeral tributary to Cat Canyon Creek. All cannabis activities will occur only on the south of Cat Canyon Creek, and there will be no access allowed for any cannabis activities to the northern part of the Project parcel. The Project description was revised in several other ways, including a clarification that all cannabis will be cultivated in 5 gallon pots using a soilless medium and a ultra high-efficiency watering system under hoops. A proposed new deep well has been removed from the Project description.

Based on that revised Project description that has been provided to us in site plans, reports, and as will be contained in the County’s Conditional Use Permit, Mr. Sullivan has determined he does not object to the revised Project. If your Board approves the revised Project as has been described to us and through documents the applicant has submitted to us and the County, Mr. Sullivan will take no further actions to appeal the County’s issuance of 23CUP-00000-00014.

We appreciate the applicant’s understanding of neighborhood and community concerns, and their revision of the Project to fit better in its setting and to reduce its impacts to the community and minimize Project water consumption. We also want to acknowledge Ms. Steinfeld’s assistance

Appellant James N. Sullivan to Board of Supervisors

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in reaching this resolution, and County Planning Staff's timely accommodation of these Project revisions.

Respectfully Submitted,

LAW OFFICE OF MARC CHYTILO, APC

A handwritten signature in black ink, appearing to read 'M. Chytilo', with a stylized flourish at the end.

By: Marc Chytilo

CC: James N. Sullivan, Appellant  
Amy Steinfeld, Esq., for Moriarity  
Alia Vosburg, PDD Planner