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Sent: Monday, July 15, 2019 9:52 AM
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Subject: Re: North County Farmers Guild Supplemental Comments on Amendments to the Cannabis Ordinance (Chapter 50)

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Dear Honorable Supervisors:

The North County Farmers Guild provides the following supplemental comments on the proposed amendments to the Cannabis Ordinance.

First, we applaud the Board’s efforts in developing and implementing a model Ordinance. We also appreciate the County’s efforts to make the permit process more efficient and streamlined. Accordingly, we support the following proposals:

- 1. That cultivators currently growing cannabis on Ag-1 zoned parcels that are required to install odor control systems demonstrate odor control compliance during the business license application process.**
- 2. Dual processing of Land Use Permits and Cannabis Business Licenses.**
- 3. Placing operators in the Carpinteria Agricultural Overlay on an “Eligible List” for the 186-acre cultivation cap upon approval of a land use entitlement.**
- 4. Broadening the definition of Hearing Officer to match County Code Chapter 24A.**

With regards to the proposed cap on cannabis cultivation, we believe that additional information and analyses are needed before a cap is developed. We request that staff work with the Board to provide data to support a carefully crafted cap that truly addresses the public’s concerns. For context, if all of the projects in the cannabis permitting queue are permitted (est. 1500 acres), this represents less than 1% of agricultural land in the County.

Given the new preliminary economic data released by the UCSB Economic Forecast Project underscoring the significant job creation and economy boosting expenditures by the Cannabis Industry in the County, we urge the County and staff to further deliberate on the issue of caps on cultivation. There is consensus that additional policy analysis and impact study should be the precursor of any cap on cultivation considerations.

We believe that establishing a cap on cultivation, without further study is premature, but we are committed to remaining engaged as our community struggles to settle upon an optimal cannabis ordinance. We therefore respectfully submit the following framework for the proposed cannabis cap:

- 1) All applicants that have **submitted** a cannabis land use application and paid application fees to the County as of the date that the cap is adopted should be included in the cap. If not, substantial investments of local farmers will be wiped out. (It important to note that a cap limiting cultivation to existing acreage in the permitting queue is a de facto illegal moratorium.)
- 2) The cap should be based upon acres of “Canopy” as defined in accordance with the State Regulations as enforced by the California Department of Food and Agriculture regulations in order to avoid duplicate regulations and the calculation of roads, unused land and other accessory uses within the Cap.
- 3) The cap on cannabis cultivation shall sunset 24 months after implementation, which will allow for an analysis of the impacts of legal cannabis cultivation after all permits are issued.
- 4) The 186-cap on Carpinteria cannabis activities shall be separate and apart from any county-wide cap.

We are continuing to coordinate with our local wineries to find synergies and to increase the number of visitors to North County. In addition, we are working with our neighbors to address pesticide drift. We are pleased to report there are safe, effective methods of utilizing pesticide that do not result in overspray and there are certain effective pesticides that do not result in contamination of the cannabis crop. We look forward to sharing our efforts with you.

Thank you for your time and consideration.

Best, Amy Steinfeld

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