



From: SB Coalition for Responsible Cannabis <coalition4responsiblecannabis@gmail.com>
Sent: Monday, June 17, 2019 5:25 PM
To: Williams, Das; Hartmann, Joan; Hart, Gregg; Adam, Peter; Lavagnino, Steve
Cc: Miyasato, Mona; sbcob
Subject: A-23 - 6/18/19 Cannabis Compliance, Enforcement and Taxation Update

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Supervisors-

One of our members was shocked to see this item while perusing the Consent agenda for tomorrow's hearing. Given the widespread interest and concern re: these matters expressed by the public, neighboring jurisdictions, Coastal Commission and media, we believe it is prudent for your Board to schedule updates on Cannabis-related issues and information as Departmental items, with broad notice given to those who have requested to be kept apprised of Cannabis Ordinance-related matters. Going forward, robust transparency in these matters *must* be considered crucial. When you last scheduled such an update, we requested it be placed on the Departmental hearing agenda for that date, and it was, as there was an additional Cannabis item. We hereby request that all future "Compliance, Enforcement and Taxation" updates be scheduled as Departmental items.

We wish to offer just a few comments on the substance of the A-23 Board letter.

Your staff report asserts that operators hold "394 Provisional Licenses", however we calculate **614** Provisional Licenses in Santa Barbara County, according to the State CDFA database. We are not sure where the discrepancy lies, perhaps there is a more current source and, if so, please provide us that information. In any event, we are disappointed to see that the County, via the CEOs office, has authorized the provision by the state of **614 Provisional Licenses since February 2019, as of the writing of this email- that is 38% of all Provisional licenses in the State of California.** Many of these operators have merely submitted the very basics of a Planning application- on several, the P&D website indicates staff is "awaiting applicant action"---for months- so truly, no authentic or robust CEQA review could possibly have been completed, let alone begun. Yet, our County continues to hand these licenses out seemingly without question.

We implore you to **PLEASE** do everything in your power to "turn the spigot off". While some County officials point blame at the State- the truth is, **it is the County's absence of license limits, project-specific CEQA review, parcel limits, acreage limits, and tolerance of grower-declared "nonconforming" status that has created and is now exacerbating this situation.**

The A-23 Board letter indicates 129 pending permit applications- this is a staggering number, given the bandwidth of the Planning & Development Department and Planning Commission. Several applications have been appealed, when neighbors learn for the first time that large grows have been permitted nearby. We hope that on July 9, your Board will take serious action to pause this

situation and allow for careful review of how we ended up in this unmanageable circumstance. We do hope that the County will stop issuing "Open letters to the community" that deny the reality that residents and visitors observe with their eyes, and noses.

Finally, on Pg 7 your staff refers only briefly to pending Budget trailer language being considered by the Conference Committee of the Senate and Assembly. This language would do two things that could have a further catastrophic impact on our County- by extending the expiration of Provisional Licenses for 5 years, and removing the requirement to have had a Temporary Licenses before applying for a Provisional one, the floodgates in our County could further open unless your Board takes action to correct the flaws in our OWN ordinance while also opposing the budget trailer language. Counties that have license and acreage caps, a process for inspecting and confirming nonconforming grows, and other protections built into their ordinances are not at risk for the kind of consequences our County faces if this Budget Trailer language remains.

We hope that County Legislative staff are vigorously opposing or seeking to mitigate the Budget Trailer language, though it does not appear on last week's Legislative Agenda.

Again, we respectfully request that future "Compliance, Enforcement and Taxation" updates be held as Public Hearings on the Departmental Agenda.

Sincerely,
Santa Barbara County Coalition for Responsible Cannabis