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January 29, 2021

Honorable Chair Nelson and Supervisors,

Re: Departmental Item 2, Cannabis Business License Ordinance Amendments

CARP Growers (Carpinteria Association for Responsible Producers) is an association of industry leaders who are committed to operating at the highest standards, and advancing best available odor control technology. We represent over 13 farms, and provide good jobs for over 1,000 employees. **We support most of the proposed amendments**, including 1) requiring operators to apply for a Business License within 15 days of an approved land use permit **(as long as sufficient resources are in place to facilitate timely responses – see below)**; 2) amendments to the Sheriff's Department, Criminal History Check/Security Plan; and 3) Incorporating the review of the premise diagram to take place as part of the land use entitlement.

However, we do **not support Section 50-23 Change in Ownership** (page 15) which would require the operator to submit a new business license application every time a company sells or transfers greater than 20% of its stock or interest. Routine business transactions and corporate restructuring are common and as currently written, Section 50-23 creates an undue burden on the County and the operator. **Alternatively, we recommend striking 50-23 in its entirety and amending it to be consistent with State regulations**, specifically the Bureau of Cannabis Control Section 5023 Business Modifications.

Lastly, we strongly encourage the **Board to direct staff to work with Community Services Department and the industry to amend Section 50-10 – Energy Conservation Plan**. The CARP Growers association takes pride in its current sustainable growing methods, which recapture and reuse water, eliminate reliance on pesticides, and leverage natural sunlight, thereby reducing energy use. The industry is eager and willing to incorporate additional sustainable and green programs and initiatives into their operations but do not believe that, as written, the Energy Conservation Plan requirement is the best vehicle to encourage renewable energy programs. The complicated formula, which is required to demonstrate energy reduction, leaves our members with limited options to meet these standards. We look forward to an opportunity to work with the County to develop and implement more impactful energy conservation measures.

Finally, we urge the County to continue to invest in additional resources needed to ensure a timely Business License issuance process. The new proposed amendment (which requires applicants to submit an application within 15 days of the land use approval) will result in a flood of applications. We have concerns about how this may impact the timely approval and issuance of Business Licenses. **We support direction to staff to require the CEO's office and relevant departments to complete review of each phase within 30 days, or a reasonable response timeframe** (e.g. Pre-Qualification, Facility App, etc). This would help give applicants clarity and certainty that they can expect each phase of the application to take no more than 30 days.

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Timely and efficient processing of the Business License application is imperative for operators who are seeking compliance with the County.

Thank you for your consideration,

Tristan Strauss  
President, CARP Growers

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*Tristan Strauss*  
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