



RE: Cannabis Ordinance

February 5, 2018

Dear Chair William and Supervisors:

Citizens Planning Association has promoted a sustainable community and enforcement of existing zoning regulations for more than 50 years. We have reviewed the staff report and viewed the video of the Planning Commission hearing regarding the proposed cannabis ordinance and would like to make the following comments.

CPA supports a sensible cannabis ordinance that balances community interests with reasonable regulation of cannabis production. CPA notices and the EIR recognizes the ordinance will have a number of Class 1 impacts on air quality, transportation, and prime soils in Santa Barbara County.

CPA supports **requiring a CUP (Conditional Use Permit) for all AG II Zoning**. Cultivation of cannabis crops is a more intensive agricultural operation that will require many more employees than now using the roadways. Additional traffic will be required to support the manufacturing, distribution, and delivery licenses. Unfortunately, the lands most suitable for cultivation are close to residential properties, not high up on the hillsides. **More thorough review** is needed in these foothill agricultural areas near residential zoning.

**Traffic** is just one issue that will affect such neighborhoods. Other negative impacts might include skunky odors, increased noise from trucks and generators and from associated cannabis “tourism”.

CPA would like to see a high standard for application of the county’s **Odor Abatement Control Plan** which will protect the neighborhoods not only adjacent to the AG II fields but further away. Buffers from any cannabis activities should be considered for residential properties adjacent to County agricultural lands. The extra scrutiny of a CUP for cannabis activities located on these AG II parcels will hopefully offer protections for these adjacent neighborhoods.

Of great concern is the allowance in the County’s cannabis ordinance for volatile manufacturing. CPA would like to see a **Prohibition of Volatile Manufacturing** on all AG 1 and Ag II parcels. Volatile manufacturing belongs in industrial areas located in the urban areas, not on fire-prone hillsides. The manufacture of cannabis products is allowed in the County’s manufacturing zone district and this should be the only zone district where it is allowed in Santa Barbara County.

CPA would like to also see a **prohibition provision of volatile manufacturing in residential areas**. In the past, several fires have been started in people's illegal grow set ups.

CPA has concerns that the recommendation before you today has not been thoroughly vetted by the public or by the decision-makers. CPA believes the recommendation that is now before the Board has certain weaknesses:

It is more lax than all the neighboring counties' cannabis regulations, which might result in more cannabis operations and associated adverse impacts in our County.

It allows an unlimited number of commercial cannabis operations within the County. Currently it is being proposed that there be no limit on the number of cannabis businesses that can operate in the County. Other counties/cities have capped the number of cannabis businesses they will allow in their area.

It only requires odors to be reduced if they impact residential zones.

It allows indoor and outdoor cannabis cultivation and cannabis manufacturing in Ag-1 zones, which could be near schools and residential areas.

By allowing outdoor cultivation and manufacturing in Ag-1 zones, the proposed ordinance will legalize operations and allow cannabis businesses to locate in close proximity to schools and residences. CPA believes the County's Odor Abatement requirements must apply in all zones and to all sensitive receptors (schools, day care, places where minors congregate), not just to odors experienced within residential zones.

We agree with the Planning Commission that the setback from schools should be increased to 1000 feet in the Coastal Zone to reduce the identified impacts on schools. Schools and other impacted parties should also be notified before the County issues a new cannabis permit. We also support the suggestions made in the Cate School letter which details the negative impacts to their campus.

Staff has analyzed two alternatives that would result in substantial reductions in the severity of many impacts by: (1) Excluding cannabis activities from the Ag-1 zone district (Alternative 1): and (2) Limiting the number of licenses that the County will issue (Alternative 3). CPA recommends that the County adopt Alternatives 1 and 3 in an effort to mitigate the Class 1 impacts.

Respectfully submitted,

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