

de la Guerra, Sheila

Public Comment

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**From:** Sam Rodriguez <sam@goodfarmersgreatneighbors.com>  
**Sent:** Monday, May 23, 2022 11:39 AM  
**To:** sbcob; sbcob  
**Cc:** Sam Rodriguez  
**Subject:** Public Comment: May 24th Board of Supervisors Meeting - Converting LUPs to CUPs  
**Attachments:** May 24th Board of Supervisors Mtg - Converting LUPS to CUPs (1).docx

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Attention: Clerk of the Board

Please accept our letter of concern relative to the proposed amendment of converting cannabis LUP projects to CUPs.

Thank you for your consideration.

Respectfully,

Sam

--  
Sam Rodriguez  
Policy Director  
916-849-4300 cell  
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[www.goodfarmersgreatneighbors.com](http://www.goodfarmersgreatneighbors.com)

May 23, 2022

**Attention: Clerk of the Board**

**Chair and Members of the Santa Barbara County Board of Supervisors**

We are writing to respectfully oppose the ordinance amendment to convert all new projects to CUPs because this change is simply unnecessary.

The existing LUP process is very comprehensive (*taking most applicants over 2 years*),  
a) involves very detailed findings and conditions on every project, and  
b) requires state agency review.

**Please note** - that many applicants have worked closely with neighbors on settlements and good neighbor agreements. And more importantly, the **cap on acreage** in the inland area is **full** and there is a lengthy waiting list.

In addition, while we appreciate the attempt to ensure that all approved LUP projects are conforming, *it's unclear under this proposed amendment, what minor changes may be made through the LUP revision process without triggering a CUP.*

It's also unclear whether land use permittees who previously have been appealed, may go through the LUP revision process. Our industry is still maturing and the existing, approved permittees may need to make changes to their approved projects in the future without fear of opening up the expensive and time consuming CUP process.

Our industry is already highly regulated by the County Planning & Development Dept., the County's CEO's office through the annual business license process and the state of CA via annual consolidated state license review process - including the California Fish and Wildlife Department. Legal Operators are currently suffering because of price compressions spurred by the illicit/underground economy and another material change in county regulations, will contribute to the uncertainty of the cannabis economy and its future.

Moreover, if the Board decides to move forward with this amendment, we request that the Board exempt projects that have an approved LUP, but have been appealed.

Regarding the projects on appeal, many of the applicants have spent several months engaging in settlement discussions with the appellants and have made good progress.

For this reason, we oppose the proposed amendment that would require projects on appeal from being converted to CUPs. It's fundamentally unfair to punish the 7 permittees who have been in the permitting process for years, have spent hundreds of thousands of dollars to meet the County's ever changing standards, and have received their LUPs. **There's a real issue of fairness and equity to now at this very late date, convert these projects to CUPs - these projects have been appealed (and are engaging in settlement discussions).**

For this reason, we are asking the Board to exclude those 7 permittees on appeal from this ordinance amendment to ensure that the CUP requirement would not apply to them, or as a last resort, to delay implementation until all 7 projects have received final board approvals.

*Please don't hesitate contact me for additional information at sam@goodfarmersgreatneighbors.com or 916-849-4300.*

Respectfully,

Sam Rodriguez  
Policy Director