



May 29, 2020

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**CITY MANAGER**

Michelle Greene

Board of Supervisors  
Attn. Supervisor Hart  
123 E. Anapamu Street  
Santa Barbara, CA 93101

**Re: Santa Barbara County Board of Supervisors Item for June 2, 2020 - Cannabis Ordinance Amendments, Case Nos. 19ORD-00000-00009 and -00011**

Honorable Chair Hart and Supervisors:

The City of Goleta has previously commented extensively about the potential impacts of cannabis uses in the unincorporated area on residents and businesses within the City of Goleta. As noted in prior comments, the City of Goleta is surrounded to the north and west by unincorporated Ag-II lands and additionally borders Ag-I lands to the southeast. An array of sensitive uses, including residential neighborhoods, schools, and hotels, abut these agricultural lands along the City's border. Because of topography, these agricultural lands are upwind and highly visible from vantage points throughout the City. The focus of the City's initial comments, which we offer below for the Board's consideration, is on impacts at and along urban-rural boundaries:

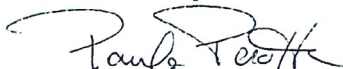
1. **Changes to Permitting Requirements (Inland).** The City supports the Planning Commission recommendation to increase permit requirements for cultivation and on-site processing from Land Use Permits (LUPs) to Conditional Use Permits (CUPs) for AG-II parcels in the inland areas. Note that in AG-I parcels less than 20 acres in size, cannabis is currently prohibited.
2. **Changes to Permitting Requirements (Coastal).** The City also supports the Commission's recommendation to require a CUP, rather than a Coastal Development Permit (CDP), for cultivation in AG-I and AG-II and for nonvolatile manufacturing and distribution in AG-I and AG-II in the coastal zone. The proposed amendments requiring CUPs would make those approvals appealable to the Coastal Commission, an improvement to the existing process.

3. **Changes to Permitting Requirements (Countywide).** The City also supports the Commission's recommendation to require odor abatement plans for cannabis activities, including requiring related findings.
4. **Protections Should Be Based on a Set Distance from the Urban Boundary.** For consistency of application and uniform protection, the City requests that, in addition to any CUP requirement, the Board place a ban on cannabis cultivation within a substantial set distance of at least one mile from the urban-rural interface. A CUP requirement by itself, while a step in the right direction, still requires the City to track County permitting actions closely and to engage on a case-by-case basis, where cannabis cultivation proposals could impact the City's residents and businesses. Adding a set buffer requirement will offer clarity, consistency and predictability for cannabis cultivators and adjacent uses alike. Ultimately, it would save both the County and adjacent incorporated urban areas much needless time and effort in permit and appeal processes for cannabis cultivation proposals that are incompatible due to proximity to sensitive uses.

In summary, we recognize that cannabis cultivation activities associated with the impacts being described are outside of the City's jurisdiction and within the jurisdiction of the County. The City supports the Planning Commission recommendations to strengthen the permit requirements with one additional request to include buffering requirements. Addressing our concerns will protect the livability of our urban areas and ensure that the land uses along the boundaries of the City and County are compatible.

Thank you for considering the City's request to address its concerns. Please feel free to contact Planning and Environmental Review Director Peter Imhof by email at [pimhof@cityofgoleta.org](mailto:pimhof@cityofgoleta.org) or by phone at 805.961.7541, if you would like to discuss our comments.

Sincerely,



Paula Perotte  
City of Goleta Mayor

cc: City of Goleta Council Members  
Michelle Greene, Goleta City Manager  
Peter Imhof, Director, Planning and Environmental Review Department