

Ramirez, Angelica

Public Comment

#7

**From:** Eric Lightman <eric.lightman@shrynegroup.com>  
**Sent:** Thursday, May 28, 2020 3:01 PM  
**To:** Hartmann, Joan; Williams, Das; Hart, Gregg; Adam, Peter; Lavagnino, Steve; sbcob  
**Subject:** Public Comment D7 Oppose Cannabis Amendments  
**Attachments:** Eric Public Comment - SB BOS.pdf

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Honorable Supervisors,

Attached please find a public comment on behalf of myself and my clients in Santa Barbara County. Thank you.

Best,

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**Eric M. Lightman**  
General Counsel

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Honorable Supervisors,

As General Counsel for several applicants in the permitting process - who are very close to approvals of their LUPs - we are strongly opposed to any amendments which would require us to convert our permits to CUPs. We are also highly concerned about the proposed language from the Planning Commission regarding odor standards, which are vague and unreasonable for outdoor cultivation on large Ag-II parcels in isolated areas.

We have been working with a land use consultant for over a year and have been actively responding to requests for additional information from the Planning Department. We have put together a comprehensive application including landscape plans, fencing & security plans, and a biological resource assessment. It is unreasonable to change the rules on applicants this late in the process.

Our projects are designed to mitigate impacts on neighbors and include a limited cultivation area, and strategic siting of the project. However, we do not support blanket requirements for all applicants to convert to CUPs. We are also opposed to arbitrary setbacks from vineyards, especially considering there is no scientific data to show that cannabis terpenes cause wine taint and in fact there are countervailing studies showing the opposite to be true.

Lastly, we oppose the suggested odor amendment by the PC (which was crafted on-the-fly at the end of 4 public hearings). This standard is too vague and will certainly be used by the opposition to appeal all projects, resulting in further gridlock in the permitting process. We have already proposed to move processing (which emits the most odor) offsite. We are confident our project will not result in odors that are detrimental to the neighborhood, because we are only proposing to harvest a limited number of times per year, we are on a large Ag-II parcel, which is isolated from other residential, and surrounded by other agriculture.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Lightman", written in a cursive style.

Eric Lightman  
General Counsel