

Lenzi, Chelsea

From: Bobbie McGee <medmanagement@yahoo.com>
Sent: Friday, March 16, 2018 1:15 PM
To: Adam, Peter; Hartmann, Joan; Lavagnino, Steve; Williams, Das; Wolf, Janet
Cc: sbcob; Fogg, Mindy; Klemann, Daniel; Bozanich, Dennis
Subject: Cannabis Amendments to Uniform Rules; Agenda Item D-3; March 20, 2019

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Supervisors,

My husband and I own and operate a 560 acre ranch in the Santa Ynez Valley north of Buellton. I wanted to reach out to you to express my thoughts and concerns regarding the draft proposed amendments to the Uniform Rules for cannabis uses on Williamson Act properties in the County of Santa Barbara.

Over the past couple of years, there have been changes to my ability to use my land because of the Agricultural Preserve contract signed by previous landowners many years ago. While the intent of the law has always been observed on our ranch, changes in finances and family structure and changes to the Valley have made it necessary for us to find additional avenues of income in order to keep our family ranch. Like many other agricultural landowners in the Valley, we would like the flexibility to use our ranch to farm cannabis.

Large landowners can no longer count on cattle or traditional agriculture to cover the cost of maintaining their properties. Times have changed – as evidenced by the enormous growth of business and tourism in the Santa Ynez Valley. It is critical that we have the flexibility to change crops and adjust to market supply and demand. In order to keep landowners under Williamson Act contract, the Board of Supervisors (and especially APAC) have to adjust their interpretations of what constitutes “agriculture” and “agricultural use.” These concepts need to include other more non-traditional agricultural revenue opportunities, so that these properties will not be lost to future commercial development. The cultivation of cannabis is farming in its truest sense. What it takes to farm cannabis is similar in many respects to what it takes to produce the other agricultural products the County considers to be “qualifying” for purposes of maintaining minimum eligibility requirements.

I have heard from members of APAC that I have benefitted greatly from my reduced property taxes because of my Williamson Act contract. I can tell you that as a result of interpretations of the Uniform Rules, I have lost several lucrative revenue streams that amounted to much more income than what I saved as a result of being under Williamson Act contract. Property owners who have other revenue streams add jobs and income into the local economy at a far greater rate than land that just raises a few cows. The tax benefits my husband and I see don't even come close to the loss of revenue we could have realized from other ventures that support agricultural use of our property. Bottom line, the cost to us of staying in the Williamson Act is turning out to be far greater than the cost of paying regular property taxes.

I have recently spoken to a property appraiser regarding our ranch. The appraiser told me that the value of our property would be greater if the local rules allowed us to legally cultivate cannabis on the property. If, as a result of amendments to the Uniform Rules, we are unable to cultivate cannabis here, the Williamson Act is no longer a selling feature for our land – in fact, it could hinder the sale of property thereby reducing the value of the property. **Such a policy would not facilitate long term agricultural production on our ranch. In fact, it would do the exact opposite and make it exponentially more difficult for me to utilize the land for agriculture.** Even if we are able to hang on for a few more years – I believe the value of our property would be increased if a buyer knew that there are only a few short years left on the Williamson Act contract.

Should your Board vote to restrict cannabis cultivation on Williamson Act land, or should the APAC take it upon themselves to deny Land Use Permits for the growing of cannabis on Williamson Act properties, I will be ending my contract with the County effective September 2018. I can confidently say that I have spoken to many landowners – currently under Williamson Act contracts – who feel the same way.

How you vote, and what you decide on March 20th will have a great impact on the future of the Agricultural Preserve Program in Santa Barbara County. Please do the right thing by voting to preserve the success of the program by allowing landowners to farm cannabis on their lands responsibly.

Sincerely,

Maria McGee

2051 Jonata Park Road

Buellton California, 93427

Lenzi, Chelsea

From: Steinfeld, Amy <ASteinfeld@bhfs.com>
Sent: Saturday, March 17, 2018 12:55 PM
To: Cannabis Info; Villalobos, David; sbcob; Williams, Das; Wolf, Janet; Hartmann, Joan; Adam, Peter; Lavagnino, Steve
Cc: Ghizzoni, Michael
Subject: Supplemental Cate Comment Letter on Cannabis Land Use Ordinance and Licensing Program for March 20 Hearing
Attachments: Cate 3.1.7.18 Cannabis Letter to County.pdf; Attachment to Cate School Letter (County Cannabis Chart).pdf

Dear Chair Williams and Members of the Board:

Please see the attached supplemental comment letter (and attached chart) on the Cannabis Land Use Ordinance and Licensing Program.

We are requesting a cap on the number of licenses issued. Please also see our state-wide chart, which provides the status of commercial cultivation in all 58 counties. You will see that only 5 counties in California are allowing unlimited commercial cultivation.

Have a great weekend.

Best, Amy Steinfeld

Amy M. Steinfeld
Brownstein Hyatt Farber Schreck, LLP
1020 State Street
Santa Barbara, CA 93101
805.882.1409 tel
805.335.0614 cell
ASteinfeld@bhfs.com

[bio](#) | [vcard](#) | [bhfs](#)
Subscribe to our Water blog at water.bhfs.com

From: Steinfeld, Amy
Sent: Friday, February 16, 2018 6:18 PM
To: 'cannabisinfo@countyofsb.org'; 'dvillalo@co.santa-barbara.ca.us'; 'sbcob@co.santa-barbara.ca.us'; 'dwilliams@countyofsb.org'; 'jwolf@countyofsb.org'; 'jhartmann@countyofsb.org'; 'peter.adam@countyofsb.org'; 'steve.lavagnino@countyofsb.org'
Subject: Supplemental Cate Comment Letter on Cannabis Land Use Ordinance and Licensing Program

Dear Chair Williams and Members of the Board:

Please see the attached supplemental comment letter (and attached map) on the Feb. 6 Cannabis Land Use Ordinance and Licensing Program.

Have a great long weekend!

Best, Amy Steinfeld

Amy M. Steinfeld
Brownstein Hyatt Farber Schreck, LLP
1020 State Street
Santa Barbara, CA 93101
805.882.1409 tel
805.335.0614 cell
ASteinfeld@bhfs.com

[bio](#) | [vcard](#) | [bhfs](#)
Subscribe to our Water blog at water.bhfs.com

From: Steinfeld, Amy
Sent: Wednesday, January 31, 2018 12:20 PM
To: 'cannabisinfo@countyofsb.org'; 'dvillalo@co.santa-barbara.ca.us'; 'sbcob@co.santa-barbara.ca.us';
'dwilliams@countyofsb.org'; 'jwolf@countyofsb.org'; 'jhartmann@countyofsb.org'; 'peter.adam@countyofsb.org';
'steve.lavagnino@countyofsb.org'
Subject: UPDATED Cate Public Comment Letter on Cannabis Land Use Ordinance and Licensing Program -- Feb. 6
Hearing

Dear Chair Williams and Members of the Board:

Please see the attached [updated letter](#) that responds to the Planning Commission's recommended Draft Cannabis Land Use Ordinance and Licensing Program as amended last week.

Best Regards, Amy Steinfeld

Amy M. Steinfeld
Brownstein Hyatt Farber Schreck, LLP
1020 State Street
Santa Barbara, CA 93101
805.882.1409 tel
805.335.0614 cell
ASteinfeld@bhfs.com

[bio](#) | [vcard](#) | [bhfs](#)
Subscribe to our Water blog at water.bhfs.com

STATEMENT OF CONFIDENTIALITY & DISCLAIMER: The information contained in this email message is attorney privileged and confidential, intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copy of this email is strictly prohibited. If you have received this email in error, please notify us immediately by calling (303)-223-1300 and delete the message. Thank you.

March 16, 2018

Amy M. Steinfeld
Attorney at Law
805.882.1409 tel
805.965.4333 fax
ASteinfeld@bhfs.com

VIA E-MAIL cannabisinfo@countyofsb.org, dvillalo@co.santa-barbara.ca.us,
sbcob@co.santa-barbara.ca.us; dwilliams@countyofsb.org; jwolf@countyofsb.org;
jhartmann@countyofsb.org; peter.adam@countyofsb.org;
steve.lavagnino@countyofsb.org

Santa Barbara County Board of Supervisors
Attention: Clerk of the Board
105 East Anapamu Street
Santa Barbara, CA 93101-2058

RE: March 20, 2018 Board of Supervisors Meeting: County Cannabis Land Use Ordinance and Licensing Program

Dear Chair Williams and Members of the Board:

The Cate School (Cate) appreciates that the County Board of Supervisors (Board) is revisiting the following issues on March 20th:

- Cannabis Business Licensing Ordinance, including caps
- Updates to the Uniform Rules for cannabis operations on Williamson Act contracted land

We offer the following comments for the Board's consideration:

1) Cap on Cannabis Cultivation Operations in the Carpinteria Greenhouse Overlay Boundary Area (Option #2)

We appreciate the Board's willingness to discuss caps on cannabis operations through the licensing process. Cate remains concerned that the County is taking an extremely lax approach to cannabis as compared to other counties. A review of all 58 counties in California reveals that approximately 74% (43 out of 58) have banned commercial cultivation altogether. (See Attachment.) Only five counties are allowing unlimited indoor and outdoor commercial cultivation, such as the program proposed by Santa Barbara County. (*Id.*) The remaining nine counties have developed programs to cap, phase or otherwise limit commercial cultivation by prohibiting outdoor cultivation. Due to the fact that most counties are banning commercial cultivation, we cannot risk that the market will limit the amount of cultivation in sensitive areas of Santa Barbara County as proposed by County staff in Option #4. In fact, based on the cultivation bans that we are seeing up and down the state, there will be an increased demand for licensed cannabis cultivation operations in our county.

1020 State Street
Santa Barbara, CA 93101-2711
main 805.963.7000

Thus, we urge the County to adopt Cap Option #2. As set forth in the EIR, limiting the extent of cannabis development in the Carpinteria Region would result in substantial reductions in the severity of many impacts and protect sensitive receptors. The law is well settled that Counties may enact different zoning rules in different regions or geographic areas as long as they have a rational basis for doing so. (*Cherry v. Steiner* (D. Ariz. 1982) 543 F.Supp.1270, 1280, *aff'd*, (9th Cir. 1983) 716 F.2d 687 (Court applied the rational basis test and found there was a rational basis for establishing groundwater restrictions in certain regions and, “[i]n any case, the equal protection clause does not apply to the differing treatment accorded geographical areas.”)¹

The County has a rational basis for imposing a cap on the Carpinteria Greenhouse Overlay Boundary (or the Coastal Zone) because this area: (1) has been the most impacted by cannabis odors; (2) has the greatest concentration of greenhouses in the County and the greatest concentration of existing medical cannabis cultivation sites; (3) has a high number of sensitive receptors (schools and homes) located in and adjacent to agriculture zoned lands; (4) contains unique coastal resources including prime coastal farmland and sensitive coastal habitat that warrant different protections than other areas; and (5) has a major housing shortage. In fact, the County already has a separate coastal zoning ordinance and an Agricultural Overlay to protect these unique resources. (See Coastal Act, §§30500 – 30504; see also Carpinteria Agricultural Overlay Zone.)

Proposed Language: The maximum number of licenses for cannabis operations that may be issued by the County in the Carpinteria Greenhouse Overlay Boundary Area [or Coastal Zone] is 41.

Note: In lieu of a cap on the number of licenses or permits, Cate would also support a cap that restricts the total amount of cannabis acreage.

2) Cate Supports the Board’s Proposed Amendments to Uniform Rules for Agricultural Preserves 1-4 re Williamson Act Land

Cate supports the Agricultural Preserve Advisory Committee’s (APAC) recommendation that excluding cannabis cultivation from the Uniform Rules’ definition of “agricultural use” and “agricultural commodity” is desirable and will appropriately tailor Santa Barbara County’s agricultural preserve program to meet local, regional, state, and national needs for assuring adequate, healthful, and nutritious food. It also supports the APAC’s recommendation that: (1) cultivation must be located within the designated development envelope on superprime contracted land; (2) cannabis cultivation on contract land outside the development envelope be limited to five percent of the premises or five acres of land, whichever is less, on prime and non-prime contracted land; and (3) cannabis manufacturing, retail sales, testing, and marketing of cannabis is prohibited on contract land.

¹ In applying the rational basis test in an equal protection challenge involving a challenge to a statute exempting certain alcoholic vendors within a Maryland county from the state’s “Sunday closing laws,” the Court stated: “[The] Equal Protection Clause relates to persons as such, rather than between areas and that territorial uniformity is not a constitutional prerequisite.” (*McGowan v. State of Md.* (1961) 366 U.S. 420, 426.) In addition, California Courts have upheld caps on marijuana operations imposed by local governments. (See *420 Caregivers, LLC v. City of Los Angeles* (2012) 219 Cal.App.4th 1316, 1335-1338; *City of Vallejo v. NCORP4, Inc.* (2017)15 Cal. App. 5th 1078, 1086–87.)

3) Strengthening the Odor Abatement Plan

Cate renews its request that the Odor Abatement Plan requirements are interpreted to ensure that cannabis operations within Ag-I zones protect all sensitive receptors such as schools, and not just residential zones. (Cannabis Regulations, §35-144U(C)(7).) We believe this can be accomplished by adding just a few words to the Ordinance or including this guidance in the County's Cannabis Handbook.

Proposed Language:

The Odor Abatement Plan must prevent odors from being experienced by sensitive receptors within Ag-I and residential zones, as determined by the Director. (Cannabis Regulations, §35-144U(C)(7).)

4) Annual Survey and Monitoring Report.

We also renew our request that the County conduct a comprehensive annual survey and monitoring report to ensure that licensed cultivators are abiding by license and permit conditions, and to identify and take actions to address illegal cannabis activities. The survey should be implemented by the Cannabis Licensing Office once per year. At completion of the annual survey and monitoring efforts, the data should be assembled into an Annual Report available for review by the County Board of Supervisors. The Annual Report must contain recommendations regarding enforcement and staffing resources, to provide a feasible level of funding for an effective enforcement program.

Cate appreciates the Board's consideration of its suggestions. Should you have any questions or require additional information, I can be reached at 805-882-1409.

Respectfully Submitted,



Amy M. Steinfeld

CALIFORNIA COUNTIES: STATUS OF COMMERCIAL CANNABIS CULTIVATION

COUNTY	BAN ON COMMERCIAL CULTIVATION ¹	ALLOWS LIMITED COMMERCIAL CULTIVATION (CAPS OR INDOOR ONLY)	ALLOWS UNLIMITED INDOOR AND OUTDOOR COMMERCIAL CULTIVATION
ALAMEDA		X (Small pilot program)	
ALPINE	X		
AMADOR	X		
BUTTE	X		
CALAVERAS	X		
COLUSA	X		
CONTRA COSTA	X		
DEL NORTE	X		
EL DORADO	X		
FRESNO	X		
GLENN	X		
HUMBOLDT		X (cap on permits, vote 3/19)	
IMPERIAL		X (Indoor only)	
INYO			X
KERN	X		
KINGS	X		
LAKE			X
LASSEN	X		
LOS ANGELES	X		
MADERA	X		
MARIN	X		
MARIPOSA	X		
MENDOCINO			X
MERCED	X		
MODOC	X		
MONO	X		
MONTEREY		X (Indoor only in existing greenhouses)	
NAPA	X		
NEVADA	X		
ORANGE	X		
PLACER	X		
PLUMAS	X		
RIVERSIDE	X		
SACRAMENTO	X		
SAN BENITO	X		
SAN BERNARDINO	X		
SAN DIEGO	X		
SAN FRANCISCO		X (cap on medical canopy)	
SAN JOAQUIN	X		
SAN LUIS OBISPO		X (caps)	
SAN MATEO		X (Indoor only)	
SANTA BARBARA			X

¹ Some of these bans on cultivation are temporary (2 years or less).

**CALIFORNIA COUNTIES: STATUS OF COMMERCIAL
CANNABIS CULTIVATION**

SANTA CLARA	X		
SANTA CRUZ		X (cap by acreage)	
SHASTA	X		
SIERRA	X		
SISKIYOU	X		
SOLANO	X		
SONOMA			X
STANISLAUS		X (Indoor only)	
SUTTER	X		
TEHAMA	X		
TRINITY		X (cap on permits)	
TULARE	X		
TUOLUMNE	X		
VENTURA	X		
YOLO	X		
YUBA	X		
TOTALS	44	9	5

Lenzi, Chelsea

From: Case Van Wingerden <case@westlandfloral.com>
Sent: Sunday, March 18, 2018 7:28 PM
To: Williams, Das; Adam, Peter; Hartmann, Joan; Lavagnino, Steve; Wolf, Janet
Cc: Nelson, Bob; Litten, Jefferson; Bantilan, Cory; Elliott, Darcel; O'Gorman, Mary; sbcob; Bozanich, Dennis
Subject: D3 Cannabis Amendment to the Uniform Rules
Attachments: Case Van Wingerden Public Comment BOS March 20.pdf; ATT00001.txt

March 17, 2018

Chair Williams and Honorable Supervisors,

Re: D3 Cannabis Amendments to the Uniform Rules

My name is Case Van Wingerden and I have been a farmer in the Carpinteria Valley for over 46 years. I own a 15 acre parcel, zoned Ag-1-10, that is under Williamson Act contract and I have serious concerns about how the proposed uniform rule amendments would impact my ability to utilize my property for long term agriculture. I have been following the development of this policy issue for the last year and have continually participated in the public process by writing numerous comment letters in response to the EIR and APAC and Board of Supervisors hearings. We continue to oppose the APAC recommendation and are not supportive of the newest proposal from Planning and Development Staff.

However, we *would* support amendments to the Uniform Rules that allows for the following:

- ✓ Cultivation in pre-existing infrastructure
- ✓ Manufacturing and distribution in pre-existing infrastructure
- ✓ Commercial cannabis as principal use
- ✓ Avoid compatibility determination hearings at the APAC for each land use permit

I would also be willing to file for non-renewal, as long as I could conduct commercial cannabis activity; as described above, during the remainder of my contract. Your board could limit cannabis commercial activity to pre-existing infrastructure (and prohibit new development) on contracted lands.

I have farmed a variety of crops over the years including cut flowers, orchids and hydroponic vegetables. It has been difficult to remain profitable and as farmers, it is critical that we have the flexibility to change crops and adjust to market supply and demand. Most recently, due to the new minimum wage increase, we are required to pay our workers \$12-\$15 an hour. It is impossible to make margins on cut flowers with this new minimum wage mandate. We cannot raise prices at the supermarkets because, in our experience, the retailers just buy cheaper, imported flowers.

I have no choice but to change my crop to cannabis. I plan to process, manufacture, package and distribute cannabis in my existing agricultural warehouse building (50,000 square feet). I never imagined that cannabis would not be considered compatible with Williamson Act. Growth and processing of cannabis utilizes the exact same infrastructure and similar processes as other agricultural products. I would suggest that cultivation and extraction of cannabis actually create less impacts on the environment. Continued use of agricultural lands for commercial cannabis uses will preserve the agricultural character of Carpinteria and prevent conversion to urban uses. As a farmer for 46 years, I can definitively say that cannabis is an agricultural crop.

I'm highly concerned that P&D staff's recommendation would require me to grow a non-cannabis crop to maintain Williamson Act program eligibility. As discussed above, it is not practical or profitable for me to grow a non-cannabis crop as the principal use on my property. Due to the new, extremely stringent State cannabis testing standards, I cannot grow other crops on my farm, side by side with cannabis. For example, cut flowers require the use of pesticides. The cannabis testing thresholds are so low and sensitive that they would likely detect use of pesticide sprayed on another crop on the same farm. Growing a non-cannabis crop and cannabis on the same property would jeopardize our ability to pass State testing standards, and sell our product in the legal market.

I'm encouraged to see that P&D staff's newest proposal eliminates the previous limitations on cultivation. However, their proposal still maintains limitations on the use my existing warehouse building. Processing, distribution and manufacturing of cannabis from off-site sources is allowed, however it shall be "limited to no more than 49 percent of the volume of processed cannabis on the premise" (2-4 Cannabis; Page 28).

A "manufacturing" license simply means extraction and is no different from the process of extracting lavender oil, as an example. A distribution license merely authorizes growers to transport their product – a function that has already been taking place on Ag-1 in Carpinteria for years, under both the flower industry, and the medical cannabis collective model. **Manufacturing and Distribution are necessary agricultural support uses, which allows for the preparation for market of agricultural products, which should be permitted on Ag lands without limits.**

If we are limited in our ability to process, distribute and manufacture percentages of cannabis cultivated on other farms, we will not be able to maintain the property in agriculture. Our 50,000 square foot building offers more than enough space for us to process, extract and transport product grown on my property. Therefore, it is important for the viability of my farm that I can lease the large amount of remaining space to other cannabis growers in the Carpinteria valley who do not have existing ag buildings on their farms. Many growers have already contacted me who are highly interested to lease space in my warehouse building. **It is in the best interest of the County to encourage, not restrict, utilization of existing agricultural infrastructure for the cannabis industry.** If the Board upholds these proposed limitations, the unintended consequence is that these growers will either pursue new development of ag support buildings on their farms, or transport product out of county to another more business-friendly locality, thereby increasing vehicular traffic, and associated impacts, in SBC.

I am also very concerned that the proposed amendments would subject all cannabis applicants to a compatibility determination hearings by the APAC for each land use permit. This is overly burdensome and unnecessary. The County already requires cannabis applicants to secure a land use permit AND an annual County business license. The County has extensive development standards in place to mitigate potential impacts, and control growth of the industry. In addition, cannabis businesses must also maintain an annual State license for each commercial cannabis

activity. Mandating a compatibility determination hearing at the APAC will slow the industry's compliance with local and State regulations, and slow the County's ability to generate revenue to fund enforcement of this new industry.

Permitting cannabis cultivation, extraction and distribution without arbitrary and impractical limits, in pre-existing agricultural infrastructure on contracted lands, is the best way to preserve and enhance long-term agriculture in Santa Barbara County. Please consider how your decision today will impact local resident's livelihoods and ability to maintain agricultural use of their property.

Case Van Wingerden
Carpinteria

Lenzi, Chelsea

From: Dan Fox <dan@privatereserve.org>
Sent: Monday, March 19, 2018 8:11 AM
To: Adam, Peter; Hartmann, Joan; Lavagnino, Steve; Williams, Das; Wolf, Janet
Cc: Nelson, Bob; Litten, Jefferson; Bantilan, Cory; Elliott, Darcel; O'Gorman, Mary; sbcob; Bozanich, Dennis
Subject: Public Comment D3 Williamson Act
Attachments: Dan Fox WA Public Comment PDF March 20[3].pdf

Dear Honorable Board of Supervisors and County Staff,

Attached is my/our Public comment for your important review prior to Tuesday's BOS meeting. Thank you very much in advance for your time, interest and consideration of my/our perspective.

Warm regards,

Dan Fox, COO

805-403-4627



March 17, 2018

Dear Honorable Board of Supervisors,

My name is Dan Fox and we have a cannabis farm in the Lompoc Valley. This public comment letter is regarding the cannabis amendments to the uniform rules – agenda item #3 for your discussion on Tuesday, March 20th. We have been cultivating medical cannabis on three contiguous Ag-II-100 parcels in hoop structures and have worked closely with the county to secure Temporary State Cultivation licenses for our operation. We have two separate Williamson Act contracts across these three parcels. During our harvest season, we employ as many as 60 local residents. The proposed amendments to the Uniform Rules, as recommended by P&D staff, would be detrimental to our farming business and others like ours and our ability to be successful and competitive in this new, legal market. (We also strongly oppose the recommendation from the APAC for the reasons stated in our previous public comment letters.)

We are encouraged that the previously proposed limits on cultivation (5% or 5 acres) have been eliminated. However, we are still opposed to the limit on percentage of cannabis that can be sourced from offsite for processing, manufacturing and distribution. This won't work for our existing operation and others like ours because we currently process a large amount of product from our other parcels in pre-existing barn on another parcel. Our goal is to continue to utilize and leverage as much pre-existing infrastructure as possible. However, this policy would actually force us to pursue new development to prepare our farm's product for market. As an alternative, the County could prohibit processing, distribution and manufacturing from cannabis from out of county.

Additionally, the P&D staff recommendation would require us to grow another non-cannabis crop as the principal use to maintain eligibility in the Williamson Act program. This is problematic and seems particularly unreasonable because it would require us to shut down a large amount of our existing cannabis cultivation and replace it with another crop. Although we would like the flexibility to continue to also grow a small amount of other row crops on our farm, the principal use will continue to be cannabis. Our decision to change our principal crop to cannabis is in response to the market and the vast majority vote of the people of Santa Barbara County and our ability to continue to operate a profitable, and successful farming business **in Santa Barbara County**.

If the Board requires a non-cannabis crop as the principal use, we would likely file for non-renewal. If this is the case, we urge the Board to allow us to continue to cultivate and prepare cannabis for market, in compliance with State and local law, for the remaining duration of our contract. We also ask that you do not subject us to compatibility determination hearings by the APAC. **We have already done everything asked of us by the county, spent a tremendous amount of time and money to understand and adhere to the new rules and regulations, and this would significantly slow or stop our ability to secure more necessary permits to continue to operate in compliance with State and local law.**

Thank you for your time and attention to these important details,

Dan Fox
Lompoc, California