

LATE
DIST

#3

de la Guerra, Sheila

Public Comment - Group 8

From: Kathleen Wigle <kwigle@mac.com>
Sent: Friday, July 12, 2019 3:42 PM
To: Williams, Das; Hartmann, Joan; Hart, Gregg; Adam, Peter; Lavagnino, Steve; Miyasato, Mona; sbcob
Subject: D3- Cannabis Licensing- Proposed amendments
Attachments: D3- Cannabis Licensing- Proposed amendments

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Santa Barbara County Supervisors,

Thank you for running an excellent meeting in Santa Maria on Tuesday, July 9th. Since the board will be debating any changes next Tuesday, July 16, I wanted to respond for your consideration.

It is critical that the Cannabis Ordinance be revised due to the massive unintended impacts to our County Coastal Zone. It does not make sense to have a stricter ordinance for the inland zone than in the Coastal areas, regardless of the Greenhouse vs open field.

I have lived in Carpinteria on Foothill Rd for 32 years and am shocked about the amount of provisional licenses and current cultivation that the county allowed in our little Valley and the consequences that have resulted. Residents reside very close to the Greenhouses along Hwy 192 from the Polo Field to the Lions Park, and are negatively impacted by the current Cannabis cultivation. The Cannabis cultivation is too dense and affects Carpinteria housing values, resident's health, traditional agriculture and the wonderful reputation of our coastal community. That is even before the expansion proposed.

There are over 2.2 million sq ft of small and medium Provisional licenses currently allowed to grow Cannabis. What is actually being cultivated is anyone's guess. I looked at each of the CDPs and added up the sq footage Growers have applied for and it comes to almost 8.5 million square feet!

That is a shocking number and with the supposed limit of 186 acres, it would only cap it at over 8 Million Sq Feet. These cultivators want to produce massive amounts of Cannabis judging by their applications. **That is twice as much as is growing in Denver after 5 years and almost as much as the entire Country of Canada!**

<https://mjbizdaily.com/licensed-cannabis-cultivation-canada-exceeds-10-million-square-feet/>

<https://www.denverpost.com/2017/06/02/marijuana-commercial-real-estate/>

Odor Abatement

The odor-emitting activities that may occur are as follows:

1. Cultivation - growing
2. Harvesting
3. Drying
4. Trimming
5. Storing – All cannabis trim or flower will be stored in air-tight bags, which will be placed in a designated storage room. The storage room will also be temperature controlled with dehumidifiers to prevent deterioration of cannabis products.
6. Packaging – packaging of flower, or pre-rolls may emit odor

Nursery (propagation of immature plants) will not generate odor because the plant is not flowering. Storage or transportation of packaged product will not emit odor because the product will be in compliant packaging, which is child-resistant, re-sealable and tamper evident.

The facility operates on a continual harvest schedule. This means that all cycles of operation are happening on an ongoing basis, odor emitting activities are limited to late flower, harvesting and trimming. Flowering and harvesting occur in the greenhouses, trimming occurs in the greenhouse. Drying and curing occur in enclosed areas that are not open to the outside environment. The odor control system covers the entire property including the greenhouses.

No other California county has allowed so much stacking of provisional licenses. The state law passed never anticipated counties would allow such large industrial growth of Cannabis. Most of the activities create VOCs and odors that must be chemically neutralized. Many of the current grows still have significant odors when driving along Foothill Rd. plus they have Odor Control Systems installed that apparently are not working or need to be revised to handle processing odors.

I believe you need to have a pause in any permit approvals. Those square footage figures need to be drastically reduced before any permanent permits or business licenses are issued.

There are already 1100 employees and the expansion would allow for 4 times as much with cars, parking and traffic problems along with limited housing opportunities in our town for so many new residents.

The below actions will reduce the numbers, density and impacts:

1. Aggressive enforcement of someone growing without a license needs to be located, shutdown, eliminated from the application process. This needs to be public information to identify what applications have been withdrawn.
2. The Affidavits that were requested to receive licenses need to be verified as to Medicinal Marijuana Growth, location, sq footage and holders of Non-profit status. Those not able to verify or was lying on that Affidavit needs to be shutdown for growing without a valid license.
3. Any applicant that has unpermitted Greenhouses should be eliminated. The Carpinteria Greenhouse overlay approved almost 20 years ago, was very specific about additional greenhouses being built and it appears over 1/2 of the CDP applicants have unpermitted Greenhouses or Structures. If they didn't follow the rules then what makes you think they will now? Our county regulatory system was unable to discover and notify growers of Violations until they applied for new permits. It appears it will be very difficult to measure Cannabis cultivation sq footage or even understand the Cannabis growing cycle to determine compliance.
4. Any applicant that wants to convert hoop structures to Greenhouses should be denied because of the Agricultural Overlay that had a cap on Greenhouse construction.
5. Any applicant that wants to replace old greenhouses or build new greenhouses for Cannabis should be denied based on the Agricultural Overlay, especially if previously unpermitted.

Please pause this process and take the time to re-consider the impacts of the current regulations and the revise the ordinance accordingly.

Sincerely,

Kathleen Wigle
4188 Foothill Rd
Carpinteria, Ca 93013

de la Guerra, Sheila

From: TURNER's <mt0923@aol.com>
Sent: Saturday, July 13, 2019 1:46 PM
To: Williams, Das; Hart, Gregg; Hartmann, Joan; Adam, Peter; Lavagnino, Steve; sbcob
Subject: Letter to Board of Supervisors

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

I thank the Board of Supervisors for recently approving the conceptual motion to ban cannabis cultivation on inland parcels zoned Ag-1-20 acres and under and to require CUPs for inland parcels zoned Ag-1-over 20 acres. We now need to address the Coastal Zone (Carpinteria Valley and coastal Goleta areas), as our severe incompatible use and nuisance issues have not yet been addressed by the County. Amending only the Business License provisions is not nearly enough for Carpinteria Valley - we need to fix the land use and permitting aspects in the Coastal Zone since they are much stronger entitlements and controls.

The Coastal Zone deserves equal if not stronger protections than inland. Having stronger controls for inland Ag-1 parcels vs coastal Ag-1 parcels is unacceptable differential zoning treatment. Please enact a commercial cannabis ban on AG-1-20 acres and under in the Coastal Zone and require CUPs for AG-1-over 20 acres in the Coastal Zone, as you have done for similarly zoned inland parcels. To do otherwise would violate one of the key tenets of land use (consistency in zoning treatment) and would be very legally (and politically) questionable. In the past, the Planning Commission has highlighted the importance of having consistent zoning treatment. We understand that this would have to go back through Coastal Commission review and welcome that, as this is the proper long-term solution to the problems, we are facing here in Carpinteria Valley.

The County should not issue any land use permits, CDP approvals or business licenses until there is an independent investigation and cleanup of the County's affidavit mess (which allowed cannabis cultivation to proliferate under the guise of "legal non-conforming use"). Many growers lied on their affidavits in claiming they were growing medical marijuana prior to the cutoff date in 2016. Others illegally expanded their operations when under legal non-conforming status, which is not legal. The County did nothing to validate the truthfulness of the grower affidavits. The only way to avoid rewarding fraud is for the county to review of each affidavit to demand proof from each grower of their claims (e.g. that they were growing medical marijuana at that site before the cutoff date and how many plants). Such proof should be publicly posted to restore public trust in the County's process. Any grower who cannot prove the veracity of the affidavit needs to be shut down by the County, since it is not a valid legal non-conforming use. The County should also not approve such growers in the future (including any entities wholly or partially owned by such person or entity, including a beneficial ownership test).

I support the Proposed Amendments to the Business Licensing Ordinance submitted to the Board of Supervisors by Concerned Carpinterians and the SB County Coalition for Responsible Cannabis (as well as the draft Urgency Ordinance submitted previously to the Board of Supervisors by the Santa Barbara Coalition for Responsible Cannabis). These amendments would allow the County to minimize many of the nuisance impacts of odor from ongoing, unpermitted cannabis operations and are aimed at growers who lied on affidavits or expanded operations unlawfully after becoming a "legal non-conforming use," and who do not have odor control or adequate setbacks in place.

We need a date certain for 100% odor control and shutdown of non-compliant operations. This date cannot be dependent on first completing land use approvals, as growers should have to prove odor abatement before being eligible for a land use permit or a business license to begin with. The County's regulatory framework of requiring a land use permit prior to enforcement is nonsensical and risks providing an undeserved entitlement to an operator who has not earned it. It makes residents guinea pigs and is skewed shamelessly toward growers. Other counties have not taken such a backwards approach.

We need much more significant setbacks for schools, at least 1000' property line to property line. Cannabis odors and emissions can travel very long distances. Our high school and Foothill Road reek of marijuana, and this and other air quality aspects are having health impacts.

Residents are sensitive receptors. Please include them in the definition as such.

Do not allow permit stacking. The concentration and density of grows are unprecedented. The County now has the largest planned cannabis grows in the world. This is insane. We also have inappropriate density of cannabis grows in heavily populated areas surrounding residences, EDRNs and schools.

Revisit acreage caps for Carpinteria Valley. 186 acres is way too much and given what we know today about the unfortunate externalities of cannabis cultivation, it needs revisiting. We are experiencing extreme incompatible use and nuisance issues with the lower amount of acreage we have today - imagine what it will be like when additional acreage comes online.

Reopen CEQA review since the County's EIR did not address the impact of cannabis terpenes/VOCs on ozone and smog air pollution, which is a significant issue in Denver and Vancouver. The impact of large-scale cannabis cultivation on air pollution (ozone/smog) was not covered by the County's EIR and is a very material environmental impact that needs to be evaluated. The EIR focused on odor, when there is a much deeper air pollution issue that needs to be addressed.

Odor abatement is the County's responsibility and should not rely on residents for enforcement. The County should require the clear best practices of other states that have tread deeper into this space - carbon filtration and sealed, industrial greenhouses. Realistically, commercial cannabis growing, when done right, is an industrial, not an agricultural use, given the air pollution/emissions issues and need for sealed, closed-loop, HVAC-heavy buildings to prevent externalities. Require independent, county-funded review of odor control technologies for effectiveness and impact on public health (long-term, cumulative exposure across multiple grows) prior to allowing use.

Regards,

Michael and Lynn Turner
Owners of 6965 Shepard Mesa Road
Carpinteria, CA 93013

de la Guerra, Sheila

From: Sarah Trigueiro <sarah.trigueiro@gmail.com>
Sent: Saturday, July 13, 2019 2:53 PM
To: Williams, Das; Hart, Gregg; Hartmann, Joan; Adam, Peter; Lavagnino, Steve; sbcob
Subject: Please Save Our Coastal Zone - Carpinteria Valley and Coastal Goleta

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Board of Supervisors,

I live in the epicenter of negative cannabis impacts in Carpinteria, near Foothill Road where greenhouse upon greenhouse grows marijuana, and those that aren't growing yet are about to unless your Board intervenes. I live with intrusive nauseating smells and poor air quality that gives me allergy-like symptoms. At times my whole house smells like pot. Lately there is an unplaceable smell/taint in the air in addition - I don't know if it is from cannabis processing/extraction chemicals or odor control efforts. My houseguests (who aren't even aware of what is going on) comment on the pot smells. Along Foothill Rd, from Carp High to Nidever, it is an overwhelming presence that seeps into the car even if you are recycling your air. Sometimes I can even smell it on the freeway as I drive past Carpinteria. At night/early morning, I think some of the greenhouses vent air to the outside and it can get really pungent then. In addition, almost every night, the greenhouses below me light up like Christmas trees - polluting the peaceful night sky with bright lights like a car dealership. The overall effect is of living in an industrial area. And I know firsthand that property values have been affected. Several homes nearby have been for sale for quite awhile and are not selling despite significant price drops—people no longer want to live here because of the cannabis impacts. I would never have purchased my home had I known I would reside over some of the largest density of growing operations in the country. Would you?

Thank you for recently approving the motion to ban cannabis cultivation on inland parcels zoned Ag-1-20 acres and under and to require CUPs for inland parcels zoned Ag-1-over 20 acres. **We now need to address the Coastal Zone (Carpinteria Valley and coastal Goleta areas), as our severe incompatible use and nuisance issues have not yet been addressed by the County.** Amending only the Business License provisions is not nearly enough for Coastal Zone - we need to fix the land use and permitting aspects in the Coastal Zone since they are much stronger entitlements and controls.

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The County should not issue any land use permits, CDP approvals or business licenses until there is an independent investigation and clean up of the County's affidavit mess (which allowed cannabis cultivation to

proliferate under the guise of "legal non-conforming use"). Many growers lied on their affidavits in claiming they were growing medical marijuana prior to the cutoff date in 2016. Others illegally expanded their operations when under legal non-conforming status. The County did nothing to validate the truthfulness of the grower affidavits. The only way to avoid rewarding fraud is for the county to review each affidavit to demand proof from each grower of their claims (eg that they were growing medical marijuana at that site before the cutoff date and how many plants). Such proof should be publicly posted to restore public trust in the County's process. Any grower who cannot prove the veracity of the affidavit needs to be shut down by the County, since it is not a valid legal non-conforming use. The County should also not approve such growers in the future (including any entities wholly or partially owned by such person or entity, including a beneficial ownership test).

I support the **Proposed Amendments to the Business Licensing Ordinance** submitted to the Board of Supervisors by Concerned Carpinterians and the SB County Coalition for Responsible Cannabis (as well as the draft Urgency Ordinance submitted previously to the Board of Supervisors by the Santa Barbara Coalition for Responsible Cannabis). These amendments would allow the County to minimize many of the nuisance impacts of odor from ongoing, unpermitted cannabis operations and are aimed at growers who lied on affidavits or expanded operations unlawfully after becoming a "legal non conforming use," and who do not have odor control or adequate setbacks in place.

We need a date certain for 100% odor control and shutdown of non-compliant operations. This date cannot be dependent on first completing land use approvals, as growers should have to prove odor abatement before being eligible for a land use permit or a business license to begin with. The County's regulatory framework of requiring a land use permit prior to enforcement is nonsensical and risks providing an undeserved entitlement to an operator who has not earned it. It makes residents guinea pigs and is skewed shamelessly toward growers. Other counties have not taken such a backwards approach.

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Revisit acreage caps for Carpinteria Valley. 186 acres is way too much and given what we know today about the unfortunate externalities of cannabis cultivation, it needs revisiting. We are experiencing extreme incompatible use and nuisance issues with the lower amount of acreage we have today - imagine what it will be like when additional acreage comes online.

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material environmental impact that needs to be evaluated. The EIR focused on odor, when there is a much deeper air pollution issue that needs to be reckoned with.

Odor abatement is the County's responsibility and should not rely on residents for enforcement. The County should require the clear best practices of other states that have tread deeper into this space - carbon filtration and sealed, industrial greenhouses on properly zoned land. Realistically, commercial cannabis growing, when done right, is an industrial, not an agricultural use, given the air pollution/emissions issues and need for sealed, closed-loop, HVAC-heavy buildings to prevent externalities. Require independent, county-funded review of odor control technologies for effectiveness and impact on public health (long-term, cumulative exposure across multiple grows) prior to allowing use.

Please help us!

Sincerely,
Sarah Trigueiro

de la Guerra, Sheila

From: Judy Dean <judycathryndean@gmail.com>
Sent: Saturday, July 13, 2019 6:23 PM
To: Williams, Das; Hart, Gregg; Hartmann, Joan; Adam, Peter; Lavagnino, Steve; sbcob
Subject: Please protect Coastal Zones from cannabis over cultivation

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Board of Supervisors,

Now that we are two years into unprecedented marijuana cultivation in our County it is safe to say that this industry is incompatible with the semi-rural areas where the BOS has allowed cultivation. Nuisances like air pollution, odor, lights, traffic and visual blight are realities we are living with daily.

The County's regulatory framework of requiring a land use permit prior to enforcement is backwards and risks providing an undeserved entitlement to operators who have not earned it, and very likely lied on affidavits the County has not bothered to verify. It is skewed completely in favor of growers, over the interests of residents. Other counties have not taken such a backwards approach.

Odor problems from Cannabis persist where we live and along Foothill Road, which I travel regularly to go grocery shopping, go to the bank, post office, etc. When I have filed complaints on the County site I get a response saying nothing can be done about the odors until the growers get permits. That logic is crazy, and since I have been told in the County's official response that nothing will be done I have stopped wasting my time on Survey Monkey complaints. That does not mean the problems have gone away!

The much-touted Byers system for masking cannabis odors, is untested for long-term human exposure. Residents are being made unwilling guinea-pigs for the profit of growers. There are no long-term studies proving the Byers system is safe. While the State of California may deem the ingredients "not toxic" that is a far cry from "SAFE for long-term inhalation by humans", especially children. May I remind the commission that hand painting radium on to watch faces was once thought safe, DDT was once thought safe, Thalidomide was once thought safe, and the list could go on and on. Many of the fragrance ingredients used in the cosmetic industry can be endocrine disruptors if humans are exposed at sufficient concentrations, causing premature puberty and other effects. The use of the Byers system will put thousands of tons of chemicals into the air we breath 24/7, along with the VOC's already emitted by the cannabis plants themselves. There are no studies to prove this is safe, especially for children. It is also known to produce air pollution and smog if present in sufficient quantities. What are we doing here? The County's EIR did not address the issue of air pollution from cannabis and the air masking systems proposed to cover the stench. It needs to be repeated to address these issues.

Recently the Board of Supervisors took action to protect inland areas of the County, and similar protections are desperately needed for Carpinteria Valley. The stated reason for the new protections inland is that AG 1 parcels under 20 acres are frequently in proximity to existing residences, schools, and businesses. Carpinteria Valley has greater population density than Santa Inez Valley, so this is even more of a problem here. Why aren't we getting the same protections? This differential zoning is wrong. Coastal portions of the County deserve at least as much, if not more protection from cannabis over-cultivation than the inland areas.

Our County Supervisors have allowed a ridiculous number of State permits for a County this size; enough that we are now known as the "Cannabis Capital of the World". The Planning Commission must do its duty to the residents who live here by making appropriate recommendations to the Board that will protect the citizens of the County.

Stop allowing multiple permits per parcel and other "stacking" mechanisms. Having the largest pot farms in the world is not something we should allow.

This entire process is being driven by money----profits anticipated by growers, tax revenue anticipated by the Supervisors, campaign donations to Supervisors, cannabis industry bribes to local non-profits, and on and on. The character of our communities is being sold. Please do something about it.

Judy C Dean MD

de la Guerra, Sheila

From: Jana Zimmer <zimmerccc@gmail.com>
Sent: Sunday, July 14, 2019 12:34 PM
To: Das Williams
Cc: Williams, Das; Hartmann, Joan; Hart, Gregg; Lavagnino, Steve; Miyasato, Mona; sbcob; Adam, Peter; Ghizzoni, Michael
Subject: Cannabis hearing- July 16

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Das:

I am writing to you as a resident of the First District and as a lawyer with considerable experience as a former Chief Deputy County Counsel for land use, as a former Coastal Commissioner, and as your constituent. I have counted a dozen old friends- at least one member of my old book club, colleagues and my own teachers from the arts community, and former clients who live in Carpinteria who I care for and respect, and who I know have been involved in trying to get real relief, specifically from the odor impacts of nonconforming, unpermitted cannabis operations. I know their life experience is real, and it should not be denied or discounted, by anyone. I also believe that if the Board does not act to significantly ameliorate the conditions under which they are living, and soon, this controversy will continue to damage the Board's credibility as the policy makers in this County.

Because of these relationships, and while neither the coalition nor Concerned Carpinterians is my client, I have agreed to try to help find a path to addressing the ongoing nuisance impacts of cannabis cultivation which continues in Carpinteria without benefit of permit, and without compliance with the County's mitigation program. I spoke with your County Counsel last week prior to the July 9 hearing on amendments, about his advice on the availability of an urgency ordinance to address ongoing nuisance impacts. He listened to me but would not engage in discussion, because the Board had not yet given direction. He then made statements on the record about the legality of a second urgency ordinance in response to questions from you that I strongly disagree with as a matter of law, and as a matter of policy. However, I believe he also stated in public that "some" of the proposed provisions of the urgency ordinance could be dealt with through the licensing ordinance amendments which are on your agenda this week.

Thus, you should know that I suggested the substance of the proposed amendments to the licensing ordinance, specifically the amendments to Section 50-5, which have been submitted by the Coalition and the Concerned Carpinterians. I believe it should be straightforward for you to agree with the substance of these proposed amendments. They represent exactly what you have been saying you want: to require those operators with ongoing nonconforming operations to mitigate odor impacts as soon as possible, and they are consistent with Mr. Bozanich's stated intention in his Board letter for July 9. **The Coalition and Concerned Carpinterians have asked that you indicate in your deliberations your agreement with the substance of these amendments, and that the Board include in its direction to staff to have County Counsel and staff review and include them in the language that comes back for adoption in August.** I understand that the Carpinteria Growers- who have indicated that they have installed odor controls- have repeatedly and publicly supported efforts to require other nonconforming operators to install them as well, and promptly. There is no good reason to continue to allow the noncompliant growers to continue to benefit from their "legal" nonconforming status. Indeed, immediate installation of odor controls should be a condition of allowing that status to continue, legal or not. Alternatively, I believe the only appropriate alternative for the Board is to systematically investigate the 'affidavits' that the County previously accepted, to revoke licenses, and promptly set hearings to terminate these nonconforming uses under the zoning code.

For your convenience, the key substantive language is as follows:

Delete: 50-5(a)(3) exemptions from Business License:

~~Legal nonconforming medical marijuana cultivation sites established by County Code Section 35-1003, until they are terminated, pursuant to County Code Section 35-1003.C, as may be amended.~~

ADD new 50-5(a)(3)

(i): All owners and operators of legal, nonconforming cultivation sites shall apply for a business license under this ordinance within 30 days of the effective date of this section 50-5(a)(3), regardless of whether a final zoning or land use entitlement has been approved or issued.

(ii) In addition to any other requirement, for indoor cultivation, the application shall include evidence of purchase and installation of odor control, and verification by an independent third party, under penalty of perjury, that best available odor control technology has been installed and is operational as of the date of the application.

(iii) For outdoor cultivation, the applicant shall submit evidence that the boundary of the parcel on which cultivation is occurring is at least 1500 feet from the parcel boundary of a residential use, a school, or a pre-existing agricultural operation, including but not limited to avocado and viticulture.

(iv) The County Planning and Development Department shall inspect the cultivation site within 14 days of submittal the license application, to verify that odor controls have been installed, are operational, and that odor cannot be detected beyond the property line. For any site where odor controls are not operational and effective, the application for business license shall be summarily denied, and the State licensing authorities notified.

(v) Installation of a particular method of odor control under this section shall not vest a right to continue to implement that method of odor control if, upon permit approval or compliance review, the County determines that another method of odor control is more effective.

(vi) The County shall post and maintain a list of legal nonconforming operators for which odor controls have been installed and verified on its website.

(vii) For any site which the Planning and Development Department determines is an illegal nonconforming site by reason of illegal initiation or expansion of cultivation since January 16, 2016, the Board of Supervisors shall set a termination hearing as authorized under the zoning code.

I would be pleased to discuss this language, or any equivalent alternative that staff and County Counsel would support, with them. If you would care to discuss this with me prior to the hearing, you are welcome to call me.

Jana Zimmer, Attorney/
Government Relations Consulting
(805)705-3784

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de la Guerra, Sheila

From: donald thorn <thethorns4@cox.net>
Sent: Sunday, July 14, 2019 3:13 PM
To: sbcob
Subject: Fwd: Equal Treatment

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Equal Treatment

I live in the Carpinteria Valley on Shepard Mesa Hill. I am saddened, angered and stunned by the out of control flooding of my area by the cannabis industry. I am not against using it for medical purposes, but that is not what is happening in my area. It is about money.

Last week, I watched the Board of Supervisors meeting dealing with cannabis. I was encouraged when they approved a motion to ban cannabis cultivation on inland parcels zoned Ag-1-20 acres and then required CUPs for inland parcels zoned Ag-1 over 20 acres.

The question must be asked, however, why didn't they do the same for the Carpinteria Valley and the Goleta Coast? (coastal zone) The Carpinteria Valley has been affected the most, most, negatively. The odor issue and the permit / license process needs to be addressed. The coastal area deserves to be treated equally. It is wrong for the Board of Supervisors to pick and choose who gets help. Please be fair to everyone.

Diana Thorn
7379 Shepard Mesa Rd.
Carpinteria, Calif.

de la Guerra, Sheila

From: david fishman <dfishman.carp@gmail.com>
Sent: Sunday, July 14, 2019 3:32 PM
To: Williams, Das; Hart, Gregg; Hartmann, Joan; Adam, Peter; Lavagnino, Steve; sbcob
Subject: Save our coastal zone

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Thank you for recently approving the motion to ban cannabis cultivation on inland parcels zoned Ag-1-20 acres and under and to require CUPs for inland parcels zoned Ag-1-over 20 acres. **We now need to address the Coastal Zone (Carpinteria Valley and coastal Goleta areas), as our severe incompatible use and nuisance issues have not yet been addressed by the County.** Amending only the Business License provisions is not nearly enough for Coastal Zone - we need to fix the land use and permitting aspects in the Coastal Zone since they are much stronger entitlements and controls. Please help us fix this problem.

Sincerely,
David Fishman

de la Guerra, Sheila

From: Rob Salomon <robb.salomon@gmail.com>
Sent: Sunday, July 14, 2019 4:17 PM
To: Williams, Das; Adam, Peter; Hart, Gregg; Lavagnino, Steve; Hartmann, Joan; County Executive Office; de Bruin, Adriana; PAD; sbcob
Subject: Letter for July 16, 2019 BOS Meeting
Attachments: RS letter for 7-16-2019 BOS Mtg v 2.docx

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To: Board of Supervisors, CEO, County Counsel, Planning & Development

Please read the attached letter regarding cannabis regulation issues. Also, please enter the letter into the record of public input for the July 16, 2019 BOS meeting.

Thank you,

Rob Salomon

To: Santa Barbara County Board of Supervisors, CEO, Planning & Development & County Counsel

Re: Cannabis Cultivation & Legal Nonconforming Use

Date: July 16, 2019

Dear Supervisors et al,

In California, the requirements for the valid creation of legal nonconforming use status are clear:

1. The party claiming the status has the burden of proof to produce substantial evidence, subject to public scrutiny, proving entitlement to the status. No evidence introduced, no entitlement to the status. Santa Barbara County (the County) has bestowed the entitlement without any evidence to support it, none.
2. The party claiming the status also has the burden of proof to introduce evidence to enable the County to make a finding as to the baseline extent of that use. The requirement exists because absent a finding as to the baseline extent of the use, it is virtually impossible to determine subsequent illegal expansion of that use. In Santa Barbara County, the claimant submitted no evidence, the County conducted no investigation & made no finding as to baseline extent of use.
3. A jurisdiction is neither allowed to waive adherence to these requirements nor to ignore the assignment of the burden of proof to the claimant; the County has, in fact, waived both requirements & has flipped the burden of proof to itself or the public. If you want evidence, look at the wording of the County's Letter of Authorization to the State; look at the refusal of the County, on the grounds of public safety, to disclose publicly the sites that were arbitrarily granted the legal nonconforming status.

Now the County says it will take steps to terminate cannabis activity of those who have illegally expanded their legal nonconforming use. These are seemingly strong words, which seem to reflect a desire for stringent regulation & robust enforcement. Throughout the cannabis regulatory process, it has seemed the County's actions don't align with its words. The words have promised stringency, the actions have not delivered. Unless the County revisits the arbitrary award of legal nonconforming use status to the majority of applicants, the County's actions will again fail to live up to its words.

Because of the failure to adhere to the California legal requirements stated above, I believe none of the nonconforming uses that the County has recognized since January 19, 2016 has been validly & lawfully created. But, assuming that they are valid for the purpose of the County's stated goal to determine illegal expansion, please answer a question for me, at least for greenhouse grows in Carpinteria & elsewhere:

Since the County failed to make a finding regarding the baseline extent of the uses that were arbitrarily pronounced legal nonconforming, how will it determine that there has been illegal expansion? How will it determine that something has grown when there has been no determination of how big it was to begin with?

The County has rewarded & encouraged, intentionally or not, the use of invalidly established legal nonconforming status to qualify applicants for widespread cannabis activity. I trust that each of you favor having County actions align with its new, stringently-robust-sounding words. At this point, I believe the only way to do that is to retroactively adhere to the requirements of California law which circumscribe the creation of legal nonconforming use status. The claimants must prove in open hearing their entitlement to the status & the extent of that entitlement.

Only after the County has done what California law requires will it be able to effectively take the action it says it wants to take; that being to terminate the right to conduct cannabis activity of all those who cannot carry their burden of proof as to claimed entitlement to legal nonconforming status or who have unlawfully expanded their entitlement. **Neither the County nor the public should be required to prove the claimant was not entitled to legal nonconforming status; if the claimant has proved entitlement & a finding has been made as to the extent of that entitlement, as part of the cannabis permitting/licensing process, the applicant should be required to then prove it has not expanded beyond that baseline use.**

Respectfully submitted,

Rob Salomon

de la Guerra, Sheila

From: Kim Jones <kimj684@gmail.com>
Sent: Sunday, July 14, 2019 4:34 PM
To: Williams, Das; Hart, Gregg; Hartmann, Joan; Adam, Peter; Lavagnino, Steve; sbcob
Subject: Pot growing rules and regulations need updating

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Santa Barbara Board of Supervisors,

The PBS Newshour series on pot reported that people of color were four times as likely to have been jailed for marijuana possession, but it is virtually impossible for them to participate in the legal pot industry which is only for wealthy white people of privilege.

Former Speaker of the House, John Boehner is now a lobbyist for the pot industry and acknowledged on an Axios interview that there is no way for poor people of color to enter this billion dollar industry.

Are the white pot growers in our County using their wealth and power to right past injustices and create equal opportunities for all? NO!

I believe that limiting pot growers to 500 plants at each site and requiring them to use charcoal filters for odor control are part of the solution to make the pot industry more fair and just.

Or was the intention all along to allow wealthy white people of privilege and power to continue to amass greater wealth contributing to the ever widening gap between the rich and the poor while eroding the middle class and fueling the problems of social injustice and the growing social unrest in our country?

Sincerely, Kim Jones, Carpinteria

de la Guerra, Sheila

From: Chuck DalPozzo <cdalpozzo@yahoo.com>
Sent: Sunday, July 14, 2019 7:39 PM
To: Hartmann, Joan; Williams, Das; Hart, Gregg; Adam, Peter; Lavagnino, Steve; sbcob
Subject: reasonable changes to Cannabis Ordinance needed

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Board of Supervisors,

Our family has farmed avocados along Casitas Pass Road and across the street from a densely populated part of Carpinteria since 1963. Changes in how our residential neighbors view agricultural operations has caused us to alter some of our farming practices in recent years. Now however, these same neighbors are a lot more concerned about how cannabis impacts them and coastal Carpinteria.

As farmers we are sympathetic to the economic plight of flower growers and their desire to grow cannabis in order to stay in business. Unfortunately the externalities of cannabis as we have learned, impact not only near by farms, but also residential neighborhoods in ways that far exceed the foot print from traditional crops like avocados and flowers.

We were told that once funding was available for cannabis law enforcement, the most egregious law violators would be shut down leaving compliant operators to thrive. Today we know of at least three that were taken down by Cannabis Enforcement, that have land use permits working their way through the system. This makes absolutely no sense.

We urge you to listen to the cities of Carpinteria and Goleta along with the numerous aggrieved residents they represent and enact reasonable, substantive changes to the Cannabis Ordinance for the Coastal Zone. You can do this by requiring Conditional Use Permits for all AG-1 parcels, a firm date for the implementation of odor control, and extended buffers for sensitive receptors, which now need to include private residents.

Sincerely,

Chuck Dal Pozzo
Pete Dal Pozzo

Dal Pozzo Ranch
Carpinteria

de la Guerra, Sheila

From: Allan Weil <alweil@cox.net>
Sent: Sunday, July 14, 2019 8:55 PM
To: Williams, Das; Hart, Gregg; Hartmann, Joan; Lavagnino, Steve; Adam, Peter; sbcob; Villalobos, David; michael@igsb.com; jparke@aklaw.net; Brown, Cecilia; SouthCentralCoast@coastal.ca.gov
Cc: Anna Carrillo; Gail Herson
Subject: Fwd: Cannabis Impact on Our Quality of Life & Consistency in Zoning Treatment

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Begin forwarded message:

From: Allan Weil <alweil@cox.net>
Subject: Cannabis Impact on Our Quality of Life & Consistency in Zoning Treatment
Date: July 14, 2019 at 8:39:08 PM PDT
To: DWilliams@countyofsb.org, ghart@countyofsb.org, ihartmann@countyofsb.org, peter.adam@countyofsb.org, steve.lavagnino@countyofsb.org, sbcob@co.santa-barbara.ca.us, dvillalo@co.santabarbara.ca.us, michael@igsb.com, jparke@aklaw.net, brownknight1@cox.net, SouthCentralCoast@coastal.ca.gov

Dear Board of Supervisors,

I live on Shepard Mesa Road and have to travel past the 5600-5800 Casitas Pass Road area as well as the north side of Casitas Pass Road going toward Lion's Park where the nauseating smell and odor is constant from the cannabis greenhouses.

This of course is one of the many areas of the Carpinteria Valley that reeks 24/7 of the pungent odor whether in your home, driving on the streets or freeways. Relatives visiting here for 4 days were appalled by odor and thought we should rename our area Car"pot"interia.

Does the Coastal Zone not deserve equal and I would say stricter protections than the Inland Zone? The Inland Ag-1 Zones have stronger controls for Inland Ag-1 parcels vs the Coastal Ag-1 parcels is nonsense and is unacceptable differential zoning treatment.

It's legally imperative not to violate consistency in zoning treatment and calls into question unfair and unethical practices. Is "consistent zoning treatment" for all areas no longer a goal or important to the Planning Commission?

Stop the legal non-conforming use fiasco now which allows the continued odor problem among other cannabis related issues.

I am in support of the Proposed Amendments to the Business Licensing Ordinance presented to the BOS by Concerned Carpinterians and the SB County Coalition for Responsible Cannabis as well as the draft Urgency Ordinance submitted previously to the

BOS by the Santa Barbara Coalition for Responsible Cannabis. These Amendments would help to minimize the many nuisance impacts.

After being strung along for approximately three years now, we need a Final Specific Date for Odor Control and shutdown of Non-Compliant Operations.

Growers need to prove odor abatement (before) getting a land use permit or business license. Why are we the only county taking such an illogical approach??

Why are not all residents, not just a select few, viewed as sensitive receptors and afforded the same protections for quality of life and free of nuisances like odor and poor air quality? 1000' property line to property line should be the bare minimum if that even can be proved to be effective!

Permit stacking is just one big loophole. Come on!!!

186 acres is way too much, unless we are trying to vie for the title of Cannabis Capital.

The CEQA review needs to be revisited because the EIR did not address the impact of cannabis terpenes/VOC 's on ozone and smog air pollution, which is now a significant problem in Denver and Vancouver.

Odor is a huge problem but air pollution is a major impact and concern that must be addressed.

Lastly, Odor Abatement is the County's responsibility and not pushed off for residents for enforcement.

The residents are demanding what ever works - sealed industrial greenhouses, carbon filtration, etc. on properly zoned areas.

I have seen that the passage of time has created somewhat of a pessimistic view among some Carpinteria Valley Residents toward their elected Representatives because their voices are being drowned out by the powerful Cannabis Lobby and their disproportionately powerful money influence (compared to the individual Carpinteria Valley resident).

Prove that the pessimism is wrong by supporting the residents who have no financial gain but are trying to protect their quality of life, their family and home!!!

Sincerely,
Al Weil

de la Guerra, Sheila

From: Joseph Ilvento <jilvento1@cox.net>
Sent: Sunday, July 14, 2019 9:55 PM
To: Williams, Das; jhartman@countyofsb.org; Adam, Peter; Lavagnino, Steve; Hart, Gregg; sbcob
Subject: cannabis carnival

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Board of Supervisors,

I have watched the Board's handling of cannabis regulations with dismay.

How can this County ban plastic bags, and then plastic straws, but allow the spewing of volatile organic compounds (VOC's) into the air we breathe? There seems to be some disconnect here, or disregard for human health.

The Board accepted an Environmental Impact Report that failed to address the very imminent danger of smog from the VOC's emitted by cannabis cultivation in vented greenhouses. Denver and Vancouver have experienced increased smog after cannabis cultivation became legal in those locations. The marine layer we experience here, so fondly referred to as "May Gray and June Gloom" is similar to an inversion layer, and can trap pollutants in our air. This year the marine layer has persisted well into July, and can occur any time of year in our Coastal areas.

Now the Byers odor masking system is being implemented to deal with the stench from cannabis cultivation, and while it may be at least partially effective for odor control it will put literally tons more chemical pollutants into the air we are breathing. There are no long-term studies proving the safety of this for humans, who will be breathing these chemicals and their by-products every day. Without studies proving long-term human safety of these compounds as chronic inhalants, especially for children, it is reckless for the County to allow the use of these systems.

Best practice technologies for cannabis cultivation have been developed, and involve CLOSED greenhouses with carbon filtration for gases, and other filtration systems for liquid effluents. Yes, these require more infrastructure, bigger utility usage, and more up-front costs. So be it. Our children are worth it. Many of the grow sites are close to our most vulnerable, low-income neighborhoods.

Workers from the cannabis industry literally reek of "stink weed" when one encounters them at the County hearings or in the community. I am concerned for worker safety in this burgeoning industry. Are they being provided with closed personal ventilation systems to wear? Skin protection when around the plants or products? Already some greenhouse workers have been the victims of crime. Even the office workers who are not around the plants or products are at risk of violent crime, since this is an all-cash industry. Are these really the jobs we want to encourage in this County? Do you really want Santa Barbara County to be the Cannabis Capital of the World? Why are you allowing the world's largest pot farms here?

I'm sure the Supervisors and Planning Commissioners have thought about these issues, but I am asking you to think again. In my view cannabis cultivation should be limited to parcels over 20 acres, with no more than one permit per parcel. We should not be looking at this as a gold rush, but I fear that is what is happening. In the end the financial gains will not be worth the costs.

Sincerely,

Joseph P Ilvento MD

de la Guerra, Sheila

From: Villalobos, David
Sent: Monday, July 15, 2019 7:12 AM
To: sbcob
Subject: Fwd: Board of Supervisors Mtg. 7/16/2019 Cannabis Cultivation in the Carpinteria Valley
Attachments: Untitled document.pdf

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----- Forwarded message -----

From: "**Sandra Weil (via Google Docs)**" <drive-shares-noreply@google.com>
Date: Sun, Jul 14, 2019 at 8:28 PM -0700
Subject: Board of Supervisors Mtg. 7/16/2019 Cannabis Cultivation in the Carpinteria Valley
To: "Villalobos, David" <dvillalo@co.santa-barbara.ca.us>
Cc: "Williams, Das" <DWilliams@countyofsb.org>, "Hart, Gregg" <gHart@countyofsb.org>, "jhartmann@countyofsb" <jhartmann@countyofsb>, "peter.adam@countyofsb" <peter.adam@countyofsb>, "Lavagnino, Steve" <steve.lavagnino@countyofsb.org>, "michael@igsb.com" <michael@igsb.com>, "jparke@aklaw.net" <jparke@aklaw.net>, "Brown, Cecilia" <brownknight1@cox.net>, "SouthCentralCoast@coastal.ca.gov" <SouthCentralCoast@coastal.ca.gov>

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

sandyweil@cox.net has attached the following document:



Untitled document



This is bheing sent for he BOS Mtg. July 16, 2019

Google Docs: Create and edit documents online.

Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA

You have received this email because someone shared a document with you from Google Docs.

Google

July 16, 2019

TO: Santa Barbara County Board of Supervisors

RE: Cannabis Cultivation and Growers in the Carpinteria Valley

I am writing to ask you to consider the following:

1. The Coastal Zone deserves EQUAL if not stronger protections than Inland Zones. I believe that differential zoning is unacceptable treatment. I think this should go back to the Coastal Commission because there should be consistency in zoning treatment.
2. The County should not issue any Land Use Permits, CDP approvals or Business Licenses until there is an independent investigation and clean-up of the licenses that have been issued. Many growers lied on their affidavits and they were not growing medical marijuana prior to the cutoff date of January, 2016. In addition, other growers illegally expanded their operations when they were under the legal non-conforming status. I believe that these growers should be shut down and not allowed to reapply since we have such an undesirable density of cultivation in our area.
3. We need a date certain for 100% odor control and shut down of non-compliant operations. This issue is beyond unacceptable and is a NUISANCE that should not be tolerated under any circumstances.
4. All cannabis cultivation should have a buffer zone of 1000 feet or preferably a mile from schools, homes or businesses. PROXIMITY should have and should be considered for any Business Licenses for cannabis cultivation in the Carpinteria Valley.
5. NOTICING is a must in the future for all homes, schools, businesses, etc. We are all "Sensitive Receptors" and we should have never been exposed to this type of nuisance.
6. The RUSH FOR TAX MONEY has led to too many permits and allowed many growers to act irresponsibly to make as much money as they can before "Big Pharma" moves in. It seems that many know that this is their chance to make millions legally or illegally and they are willing to take advantage of the fact that the county does not have enough enforcement to manage what is happening throughout Santa Barbara County.
7. As a retired high school educator and administrator, I know how important tax dollars are for school programs and operations. I would never condone this type of nuisance for our students. The permitting process for the Carpinteria Valley was not carefully thought out or managed. We should never have had the HIGH DENSITY OR PROXIMITY of cannabis operations located next to the high school, Boys & Girls Club, Girl's Inc. or the neighboring homes where our students and their families live! To me, this should have been common sense planning!
8. Why does our country have the most Provisional Licenses in California?

I am asking each of you to keep working on a solution that benefits all the people of Santa Barbara County and to look for additional tax revenues that would be beneficial to all of our citizens.

Sincerely,

Sandra Weil

de la Guerra, Sheila

From: Tyler Willson <tylerwillson@yahoo.com>
Sent: Monday, July 15, 2019 7:57 AM
To: Williams, Das; Hart, Gregg; jhartmann@countyofsb.com; peter.adam@countyofsb.com; steve.lavagnino@countyofsb.com; sbcob
Cc: RoyLee@ci.carpinteria.ca.us; Tyler.Willson@kaplan.com
Subject: Cannabis Ban Ag-1 in coastal zone

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

- Dear SB BOS,

I was born, raised, and now am raising my own family on Shepard Mesa in Carpinteria. Without getting into all the details that I, Friends of Shepard Mesa and our lawyer have already submitted (FOSM) concerning the negative impact to quality of life and environmental destruction, I want to say thank you for recently approving the motion to ban cannabis cultivation on inland parcels zoned Ag-1-20 acres and under and to require CUPs for inland parcels zoned Ag-1-over 20 acres.

We now need to address the Coastal Zone (Carpinteria Valley and coastal Goleta areas), as our severe incompatible use and nuisance issues have not yet been addressed by the County. Amending only the Business License provisions is not nearly enough for Coastal Zone - we need to fix the land use and permitting aspects in the Coastal Zone since they are much stronger entitlements and controls.

The Coastal Zone deserves equal if not stronger protections than inland. Having stronger controls for inland Ag-1 parcels vs coastal Ag-1 parcels is unacceptable differential zoning treatment. Please enact a commercial cannabis ban on AG-1-20 acres and under in the Coastal Zone and require CUPs for AG-1-over 20 acres in the Coastal Zone, as you have done for similarly zoned inland parcels. To do otherwise would violate one of the key tenets of land use (consistency in zoning treatment) and would be very legally questionable. In the past, the Planning Commission has highlighted the importance of having consistent zoning treatment. Gerrymandered zoning entitlements strike me as political and unfair. I understand that this would have to go back through Coastal Commission review and welcome that, as this is the proper long-term solution to the problems we are facing here in Carpinteria Valley.

- Please ban further cannabis cultivation in Ag-1 Coastal Zone.

Thank you,
Tyler Willson

de la Guerra, Sheila

From: Joni Samuels, DVM <bltnvet@silcom.com>
Sent: Monday, July 15, 2019 9:59 AM
To: sbcob
Cc: 'John De Friel'
Subject: Support Cannabis farming
Attachments: Raw Garden Support Letter.docx

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Please accept the attached letter of support for cannabis cultivation and farming in our county.

Joni Samuels, DVM
Buellton Veterinary Clinic
phone: 805.688.2334
fax: 805.688.1589
bltnvet@silcom.com

Buellton Veterinary Clinic
914 West Highway 246 • Buellton, CA, 93427
Tel: (805) 688-2334 Fax: (805) 688-1589
Website: buelltonvet.com email: buelltonvet@gmail.com

TO: Santa Barbara County Board of Supervisors

RE: Support for Cannabis Cultivation and Farming

We are writing in support of Cannabis farming outside of Buellton on Santa Rosa Rd. We live in the EDRN across the river from and directly adjacent to a Cannabis farm and the operators are great neighbors and have contributed to cleaning up a property that hadn't been maintained for years which has made the entire neighborhood nicer.

We appreciate that Cannabis farming is organic and uses very limited amounts of water compared to other crops. We are not bothered by odor from the farm and are glad to have a Cannabis farm next door.

As a member of the Buellton community, a neighbor and long-time resident of Santa Barbara County, our family has welcomed the opportunity to learn about cannabis farming through our neighbors.

There has never been any issues of concern.

Moreover, our community has a tradition and a set of values to reach out to one another, invite conversation and build a trusted system of communication for whenever there are questions that may need an urgent response.

Sincerely,

Joan M. Samuels, DVM
914 W. Highway 246
Buellton, CA 93427

de la Guerra, Sheila

From: Joni Samuels, DVM <bltnvet@silcom.com>
Sent: Monday, July 15, 2019 10:04 AM
To: sbcob
Cc: 'John De Friel'
Subject: Support Cannabis
Attachments: Cannabis Support Letter.doc

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Please accept the attached support letter for cultivation and farming of cannabis in our county.

Charles and Joan Boles
920 W Highway 246
Buellton, CA 93427

QUAILHAVEN



920 West Highway 246
Buellton, CA 93427

TO: Santa Barbara County Board of Supervisors

RE: Support for Cannabis Cultivation and Farming

We are writing in support of Cannabis farming outside of Buellton on Santa Rosa Rd. We live in the EDRN across the river from and directly adjacent to a Cannabis farm and the operators are great neighbors and have contributed to cleaning up a property that hadn't been maintained for years which has made the entire neighborhood nicer.

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There has never been any issues of concern.

Moreover, our community has a tradition and a set of values to reach out to one another, invite conversation and build a trusted system of communication for whenever there are questions that may need an urgent response.

Sincerely,

Charles L and Joan M. Boles
920 W. Highway 246
Buellton, CA 93427

de la Guerra, Sheila

From: Anna Carrillo <Annacarp@cox.net>
Sent: Monday, July 15, 2019 12:01 PM
To: sbcob
Subject: [DO NOT CLICK, Likely malicious content, contact your Departmental IT] Comments Re: Potential Amendments Chapter 50

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To: Supervisors
From: Anna Carrillo
July 15, 2019

At your 7/9/19 Board meeting, it was unacceptable that because Carpinteria is in the Coastal Zone no changes were made in land use requirements. Since you voted to ban cannabis cultivation on Ag-1 5, 10, 20 acres parcels in the inland, this same treatment should have been accorded to our area. You did require CUPs on larger parcels, but what happened to the Planning Commission's recommendation that if CUPs are required in the inland, they also be required in the Coastal Zone. Please figure out a way to follow-up on this.

Yesterday, I read from a 1/17/19 Cannabis Business Times article title "7 Tips to Neutralize Cannabis Odor Now". "In many jurisdictions local and state regulators mandate an odor control system before issuing a permit to grow cannabis as in Oregon and Washington."

According to the planning site of June 12, 2019 there are currently 19 sites in Carpinteria that have provisional licenses and according to Marc Byers, he has installed odor vapor systems in 12 of them and 2 others are using a different odor abatement system. According to someone in the know there are probably around 7 sites that don't currently have odor abatement. Schools in Carpinteria begin Aug. 27. Please make it mandatory that odor abatement systems be in place and regularly inspected by then. The City of Carpinteria asked for a date certain. Once those currently growing under provisional licenses, then those without can be shut down because the location of the malodors can be found easier. We've been living with this problem for the last 2 1/2 years.

I have recently heard that the smelly place just west of Carpinteria High School, smells so bad because of the processing that is being done at that location. Does processing require a higher level of odor abatement than cultivation? I was also told that if I were to visit a processing facility I would need to wear clothes that I wouldn't want to wear again because the smell is so intense. Are you aware of that? Should there be different odor abatement requirements for processing? Is that why some sites are using carbon filters for the processing?

http://www.potportal.net/why-santa-barbaras-idyllic-wine-country-embraced-cannabis-farms/

<http://potportal.net/why-santa-barbaras-idyllic-wine-country-embraced-cannabis-farms/>

In January, the California Growers Association, a leading advocacy group for cannabis farmers, sued the California Department of Food and Agriculture over a state rule allowing producers to compile multiple cultivation licenses in **cannabis mega-farms**. The organization said allowing farms larger than four acres violated Proposition's 64 pledge to

forge a legal cannabis industry “around small and medium sized businesses by prohibiting large-scale cultivation licenses for the first five years.”

The ordinance prohibits an overconcentration of cannabis cultivation in one area. Carpinteria has 25% of the provisional licenses and 36% of the operators. There needs to be a limit of how much acreage per site can be used! Because of our density of 1 greenhouse next to other greenhouses, I think there needs to be some limits, only allowing a certain number of acres, possibly 3 and/or a certain percentage to be cultivated per parcel. That would decrease our density significantly. For example, in front of La Mirada (an EDRN), 3615 Foothill have requested 9 acres, then there's 3561 requesting 8 acres, then 3505 requesting 11.65. Many of these also border on Via Real, 3508 Via Real is requesting 4.39, then 3500 Via Real is requesting 5.5. That's a lot of density in a very small, compact area. While I was glad to have the limit of 186 acres, I never realized the unintended consequences of having so much. We're having trouble with just what is growing under provisionals now as of the ones I've listed here only 2 are currently cultivating with 3 in the pipeline and I have no idea how much is currently being grown on the 2 parcels that are cultivating. There is the same problem around the high school, with 5 around the high school.

So again as the City of Carpinteria requested, please provide some limit to the amount of acreage being used and provide some distance between each contiguous greenhouse operation.

If sealed greenhouses would be mandated with internal odor control be required, a lot of problems would be solved.

Again, the Board needs to solve the immediate problem of preventing odor from leaving the site with wind, air studies and reexamine density and distance from schools and residents. The City of Carpinteria also requested increasing sensitive receptors to include residents, increasing the distance and the measuring from property line to property line.

There also needs to be verified as to whom was growing medical marijuana before Jan. 19, 2016. With this proof via nonprofit status, a SII100, tax records, etc. the county and the public would know who rightfully was growing before this time and what their initial footprint was. There was to be no expansion of what was being grown prior to Jan. 16, 2019. Again this mistake needs to be corrected!

Another suggestion, on the placard announcing a site has submitted an application, please require that a phone number be listed for the 24/7 operator in charge of odor complaints. The complaint process is still quite laborious. I have also asked to have a phone number listed on the county complaint site. Not everyone has a computer.

Anna Carrillo

On Jul 14, 2019, at 2:56 PM, Williams, Das <DWilliams@countyofsb.org> wrote:

I will figure these all out and get back to you. Ms. Alexander can tell you if you can still submit into the record. Still planning to put out all we discussed last week and more.

Sent from my iPhone

On Jul 13, 2019, at 9:06 PM, Anna Carrillo <Annacarp@cox.net> wrote:

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Hi Das,

Do you know if the public will be able to speak on Tues. re: business license changes and whether the public still can submit letters?

Also do you know what time this item will be heard on Tues.?

Thank you for any help you can provide?

Anna Carrillo