

From: [Villalobos, David](#)
To: [sbcob](#); [Metzger, Jessica](#)
Subject: FW: Response to the January 31, 2018, letter from Hollister & Brace law firm to the County Board of Supervisors requesting postponement of cannabis action.
Date: Tuesday, February 6, 2018 8:00:47 AM

From: Jonathan McKee [mailto:connectdistribution2018@gmail.com]
Sent: Monday, February 05, 2018 5:11 PM
To: pcandy@hbsb.com; Villalobos, David <dvillalo@co.santa-barbara.ca.us>; Bozanich, Dennis <dBozanich@countyofsb.org>
Cc: Jonathan McKee <connectdistribution2018@gmail.com>; Wolf, Janet <jwolf@countyofsb.org>; Adam, Peter <peter.adam@countyofsb.org>
Subject: Response to the January 31, 2018, letter from Hollister & Brace law firm to the County Board of Supervisors requesting postponement of cannabis action.

Hello Mr. Candy,

I have been following your work with the Cannabis Organizations.

Please respond to the following thought:

County of Santa Barbara overreaches its jurisdiction by excluding Cannabis as an Agricultural Commodity. (See Exhibit 1).

Staff has produced no studies that differentiate cannabis from any and all other plant life.

The Board **must have studies** supporting a finding. The Board does not have such factual finding regarding Cannabis.

Where are the facts that show how the cannabis plant is different from any other agricultural plant, like: Olives; Grapes; Broccoli; Garlic; Alfalfa; or Avocados?

We need a formal study to prove that the exclusion is not an overreach. **Without the finding of facts**, a jurisdictional overreach exists.

The County of Santa Barbara without proven facts does not have the authority to exclude cannabis as an "any and all plant." If it is a plant that is produced in the county for commercial purposes, then it is an Agricultural Commodity. The recommended exclusion is not supported by facts. The Agricultural Preserve Advisory Committee (APAC) does not recommend such exclusion. In fact, APAC questioned the exclusion. APAC requested that staff provide future guidance from the Board. None was given. The exclusion is an overreach of governmental jurisdiction. Staff just put it in there.

The recommended changes to the Uniform Rules of Agricultural are not genuine; nor are they supported by facts. The **exclusion should be denied** as an overreach.

Jonathan McKee