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Sent: Monday, March 19, 2018 11:40 AM
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Subject: City of Carpinteria Comment on Item 2 on 3/20/18 Agenda – Consideration of Cannabis Cap

Dear Chair Williams and Supervisors:

The City of Carpinteria appreciates your Board's willingness to consider placing a cap on business licenses for cannabis uses. As you know, the City has submitted a number of letters commenting on various aspects of the County's cannabis regulations. Throughout the process, the City has advocated for the Board placing a cap on cultivation to protect the health and safety of the residents and the environment of the Carpinteria Valley.

The City reiterates its request for a cap on the total amount of acreage in AG-I and AG-II lands that can be used for commercial cannabis activity. The City proposes that the Board incorporate the following into its cannabis licensing regulations:

No more than a total of 225 acres of commercial cannabis activity may be licensed on AG-I and AG-II lands within the Carpinteria Agriculture Overlay.

This number was derived by taking 20% (percentage of existing cultivation estimated to be within Carpinteria Valley) of the total amount of Countywide cannabis acreage (1,126 acres) projected in the County's Program EIR for the cannabis regulations. This number strikes a fair balance between allowing a robust cannabis industry in the County and ensuring that the Carpinteria Valley does not experience an overconcentration of cannabis activity.

A cap on acreage is superior to a cap on the number of licenses that can be issued. Since the County's proposed cannabis licenses contain no size limitation, a cap on the number of licenses will do nothing to limit the size and related issues of very large cannabis operations in the Valley. The size of cannabis activities for cannabis operations will be readily available information because it is required for annual State licenses and County land use permit applications, making it a feasible way to implement the cap.

The cap should include all commercial cannabis activity, rather than just cultivation. The ancillary industrial and commercial cannabis uses that the Board has authorized on AG lands have the potential to create greater negative impacts than the cultivation itself. Since there is no standard in the County's cannabis regulations for how large an ancillary use can be, the cap must include all ancillary uses to provide assurance that it will provide an effective limit.

A cap specific to the Carpinteria Agriculture Overlay ("CA Overlay Area") is supported by the following points, which demonstrate the unique character of the area:

- The CA Overlay Area is a unique rural agricultural valley along the California coastline, characterized by significant coastal resources, including prime agricultural soils and unique microclimates, coastal streams and wetlands, and sweeping views of the Pacific Ocean and coastal ranges. Carpinteria Valley is among the finest in the State for the production of high-yield specialty crops. (Carpinteria Valley Greenhouse Program, Findings, Att. 2 of Board Letter, February 19, 2002.)

- Greenhouse cultivation of cannabis is the preferred method of cultivation by the industry. The CA Overlay Area has the highest concentration of greenhouses in the county and the greatest concentration of existing medical cannabis cultivation sites. (Board Letter, March 20, 2018.) The Carpinteria Valley is likely to experience a high concentration of cannabis operations due to the high concentration of greenhouses and favorable growing conditions. The CA Overlay Area is currently home to approximately forty-two percent of existing cannabis cultivation acreage within the County, demonstrating that the CA Overlay Area is already subject to overconcentration. (Board Letter, March 20, 2018.) The cannabis industry could induce further industrialization of the Carpinteria Valley by increasing greenhouse development.
- The extensive interface of urban uses and highly productive agricultural land with existing greenhouse infrastructure along the City of Carpinteria northern boundary presents unique challenges to encourage agriculture, protect resources, and ensure public health, safety, and welfare.
- The CA Overlay Area has been more impacted by cannabis odors than other areas of the County as evidenced by public comment during the County's consideration of its cannabis regulations and complaints submitted to City and County officials over the last two years. An overconcentration of cannabis uses in the small geographic area within the CA Overlay Area boundaries where sensitive receptors, including schools and residences, are abutting agricultural lands, has the potential to cause particularly acute cumulative odor impacts. These impacts could be avoided if cannabis operations were more dispersed throughout the County.
- There are only six roads in the Carpinteria Valley that provide north-south access to the CA Overlay Area from Highway 101. Those roads are State Route 150, Casitas Pass Road, Linden Avenue, Santa Monica Road, Cravens Lane, and Nidever Road. These roads are accessed from Highway 101 through urban areas via five primary intersections. Of the three that serve the bulk of vehicle traffic to the Carpinteria Valley (Casitas Pass Road/US 101, Linden Avenue/US 101, and Santa Monica Road/Via Real/US 101), all operate at LOS C or worse. As shown in the City's January 29, 2018 comment letter on the EIR, growth in cannabis operations within the CA Overlay Area would result in new significant impacts to City roads and intersections from additional truck and employee traffic. An overconcentration of cannabis uses in the CA Overlay and the resulting traffic congestion would impede access to the coast, inconsistent with Coastal Act §§ 30210, 30211, 30224, and 30252.
- As shown in the City's January 29 comment letter, there is insufficient affordable housing within the CA Overlay Area to support the expected increase in cannabis industry workers. An overconcentration of cannabis uses would exacerbate the existing affordable housing shortage in the area.

In closing, the City urges the Board to adopt the proposed cap of 225 acres. Thank you for considering these comments.

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