

Please accept my comments on the personal cultivation section of the ordinance.

I attended and spoke at all the hearings last year and very disappointed to see the consideration for allowing outdoor cultivation for personal use. At each hearing there was a community member who complained about the odor issue from a neighbor growing cannabis plants in a greenhouse in his backyard. IT seems as though his testimony has been ignored in the drafting of your ordinance. We know there is an odor issue associated with blooming plants.

There needs to be consideration of this nuisance issue for nearby neighbors who will be affected by the smell. Yet the city is recommending the allowance for 3 plants be grown outside and just 20ft from some the property line.

If someone wants to grow cannabis they should be allowed to do that so there is NO impacts to their neighbors. Outdoor cultivation should be farthest away from the neighbors property line and those growing the plants will need to mitigate any odors or other nuisance issues. What will be the standards for this? It be better than cultivating 20ft from the property line. This is wholly inadequate. We know there is already a nuisance issue for one neighbor, so the city must consider more robust standards to deal with the issue.

The county in their cannabis ordinance requires only indoor cultivation because of the nuisance issue with personal outdoor grows, which also included night time lighting. What the city is proposing doesn't consider nighttime lighting and this will have effects well beyond someone's backyard growing area.

I request the city relook at the issues with personal outdoor grows, security, odor and lighting issues, and devise regulations that address these concerns. The minimal regulations you are proposing don't do that and they need to.

Thank you!  
CECILIA BROWN

April 25, 2018

Goleta City Council  
130 Cremona Drive, Suite B  
Goleta, CA 93117

Honorable Mayor and Councilmembers and Planning Commissioners,

Re: Agenda Item A.1 Cannabis Ordinance Workshop

Thank you for the opportunity to comment on the draft cannabis ordinance. We commend the City's progress on this issue to date. Adoption of regulations and standards for this new industry will help protect consumers, public health and safety, and the character of the Goleta community. We continue to encourage the City to quickly implement an ordinance to regulate the industry and provide clear guidelines for cannabis businesses. The cannabis industry has potential to generate revenue for the City of Goleta, spur economic development and provide high paying jobs to local residents.

We represent several clients who are highly interested to locate in the City of Goleta. As follows is our feedback on the draft ordinance. Local, responsible cannabis businesses will be more inclined to set up their operations in the City of Goleta if your Council is willing to incorporate the following recommendations:

1. **Timing:** Direct staff to return with an ordinance for adoption as soon as possible. Other local jurisdictions have already adopted cannabis ordinances, standards and taxes, including the City of Santa Barbara, County of Santa Barbara and City of Lompoc. Local cannabis businesses are eager to apply for permits now, so they can begin operations and meet the increasing consumer demand for legal, safe and tested products.
2. **Taxation:** We encourage the City Council to direct staff to return with revenue generation options which will not overly burden the industry and will ensure Goleta is competitive with neighboring jurisdictions. We recommend exploring Development Agreements, or a low tax rate – below 3% gross receipts.
3. **Permit Procedures:** We are supportive of requiring Land Use Permits for the majority of cannabis activity. This is appropriate based on comparative uses in the City's General Plan.
4. **Buffers/Setbacks:**
  - a. We urge the City of Goleta to mirror the County and City of Santa Barbara and the State by defining sensitive receptors as 1) schools; 2) day care centers; and 3) youth centers and at most, require 600 feet minimum distance requirements from sensitive receptors. The City should consider only requiring minimum distances for retail and not the other license types/activities (delivery only, manufacturing and distribution) which have little to no impacts and are not open to the public.
  - b. We strongly advise against adding additional sensitive receptors or increasing the minimum distance requirements beyond 600 feet. The State's baseline setback policy is already overly burdensome for the industry. Most businesses cannot

identify property for sale or lease that is 1) in an allowable zone; 2) does not fall within the buffer/setback zone; and 3) is available for cannabis uses. Many landowners are still unwilling to lease to cannabis businesses. There is no evidence to suggest that increasing setbacks or adding additional sensitive receptors will mitigate impacts from cannabis uses. Instead, this is an arbitrary policy which cripples the industry's ability to find and secure property.

- c. We also do not recommend adopting a separation requirement between cannabis uses, which is exceedingly difficult to implement, and further burdens the industry. The State setback policy, as well as the City's discretionary permit process, will ensure that there is not excessive concentration of cannabis businesses.
5. **Accessory Uses:** The State, City and County of Santa Barbara have *encouraged* co-location of multiple license types/activities at the same location, including accessory uses. This approach is optimal because it prevents proliferation of numerous small business operations throughout the City, and therefore reduces potential impacts. Therefore, we do not support the proposed size limitation on accessory uses and especially the prohibition of volatile manufacturing as an accessory use. The market is increasingly demanding products that are prepared with "volatile" manufacturing techniques, which simply means use of hexane or butane, which are used to prepare many products, including lavender, leather, cooking oils, and soybeans. Furthermore, most businesses only need 2,000-5,000 square feet for manufacturing, distribution or delivery. It's cost prohibitive for them to lease 15,000 square feet for only one use. Therefore, many of our clients are interested to co-locate with other licensees at one location for efficiency and cost considerations.
6. **Non-Storefront Retail or Delivery-only Fulfilment Center:** This license type is designed for delivery-only businesses that do not have a storefront retail component and customer foot traffic. Since there is increasing demand for delivery of all types of goods (e.g. Amazon Prime), we recommend the City provide a quick and streamlined permitting pathway for this license type and expand the allowable zones, including, but not limited to, "BP" Business Park.
7. **Manufacturing:** Consumer demand for products prepared for market with "volatile" manufacturing techniques is rapidly increasing. The City of Goleta is uniquely positioned to benefit from this part of the supply chain given its existing infrastructure and workforce. We recommend that the Council direct staff to return with expanded allowable zones for ALL manufacturing businesses, including subtypes "volatile" "infusions" and "packaging." The different manufacturing sub-classifications primarily use the same infrastructure, equipment and procedures. Therefore, we recommend that all manufacturing types be permitted in "IS" Service Industrial, "BP" Business Park, "IG" General Industry and "GC" General Commercial. Limiting "volatile" manufacturing to only "IG" General Industry is not sufficient and shortsighted.
8. **Distribution:** Distribution simply entails receiving, storing, QAQC and transporting product between license types. Due to the small size of the product, only small sprinter vans are needed to transport this product (compared to large semi-trucks needed for other agricultural products). Distribution businesses typically only need 5,000 square feet. This commercial activity has minimal impacts. We recommend Council direct staff to return with expanded allowable zones for Distribution including, but not limited to, "BP" Business Park.

## 9. Storefront Retail:

- a. We do not support requiring a Major Conditional Use Permit. This is overly burdensome for the industry. The City's Draft Zoning Ordinance (Chapter 17.55 Use Permits; V-21) reserves CUPs for "substantial expansions in the use of land or building that may have an impact upon the general welfare and safety of the public." If an applicant is only proposing a change in use/not proposing an expansion of footprint, a Land Use Permit or Minor CUP is more appropriate given the proposed project. A Minor CUP is still subject to public hearing by Zoning Administrator, which provides an opportunity for neighbors and the public to comment.
- b. We do not support a cap on the number of retail businesses in the City. As we have seen in other jurisdictions, this policy exposes jurisdictions to legal risks and is very difficult to implement. The City's existing discretionary review process, coupled with the narrow allowable zones, will prevent over-concentration and maximize authority over the proposed project. The barriers to entry in the new legal market are high and very few businesses will have the capital or ability to secure and maintain State and local permits over time. However, if the City Council is interested in a cap, we would suggest a reasonable number – no less than 8.
- c. We do not support separation requirements between retail locations which is difficult for staff to implement (e.g. what if two applicants apply at the same time?), unnecessary and overly burdensome.

Below are recommended changes to the draft Land Use Ordinance allowable uses by zone (suggestions indicated in red).

Uses	CR	CC	OT	CG	BP	OI	IS	IG
Distribution				P	P		P	P
Manufacturing								
➤ Non-volatile				P	P		P	P
➤ Volatile				P	P		P	P
➤ Infusions				P	P		P	P
➤ Packaging				P	P		P	P
Retail								
➤ Storefront	Minor CU	Minor CU	Minor CU	Minor CU				
➤ Non-storefront (Delivery Only)				P	P		P	P

In conclusion, the newly legalized cannabis industry is struggling to compete with the black market. In addition to local permits and taxes, all cannabis businesses are required to apply for

annual State licenses for each commercial activity, and pay State taxes. We recommend that the City encourage the industry to apply for permits by expanding allowable zones where businesses can locate, quickly process permits and licenses, and require development agreements or a reasonable tax rate, which will allow the industry to be successful long term.

Thank you for the opportunity to comment on the draft ordinance on behalf of our clients,

Erin Weber  
California Strategies, LLC

CC:

Peter Imhof, Planning & Environmental Review Director  
Carmen Nichols, Deputy City Manger  
Andy Newkirk, Senior Planner



State of California – Natural Resources Agency  
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**EDMUND G. BROWN JR., Governor**  
**CHARLTON H. BONHAM, Director**



April 26, 2018

Mr. Andy Newkirk  
City of Goleta  
130 Cremona Drive, Suite B  
Goleta, CA 93117  
Email: [anewkirk@cityofgoleta.org](mailto:anewkirk@cityofgoleta.org)

Dear Mr. Newkirk:

Subject: **Draft Cannabis Land Use Ordinance: Case No. 18-035-ORD, City of Goleta, Santa Barbara County**

The California Department of Fish and Wildlife (CDFW) received a Draft Cannabis Land Use Ordinance: Case No. 18-035-ORD (Ordinance) from the City of Goleta (City) in preparation for a Joint City Council and Planning Commission workshop on April 26, 2018.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Ordinance that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Ordinance that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

### **CDFW's ROLE**

CDFW is California's Trustee Agency for fish and wildlife resources, and holds those resources in trust by statute for all the people of the State. [Fish & Game Code, §§ 711.7, subdivision (a) & 1802; Public Resources Code, § 21070; CEQA Guidelines § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect state fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Public Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & Game Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & Game Code, § 2050 et seq.), or state-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish and Game Code § 1900 et seq.) authorization as provided by the applicable Fish and Game Code will be required.

## PROJECT DESCRIPTION SUMMARY

**Proponent:** City of Goleta

**Objective:** The proposed Ordinance, if implemented, would allow and regulate recreational (adult-use) cannabis by including definitions; restrictions and allowances; permit procedures; and inspection, revocation, and enforcement requirements.

**Location:** The Ordinance applies throughout City of Goleta.

## COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the City in adequately identifying and/or mitigating significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

**Buffers and Separation Requirements.** In preparation for the City's Cannabis Ordinance Workshop, City staff asks, "What uses should be included as 'sensitive receptors' which are provided a buffer from cannabis uses?" Fish and Game Code sections 5650 and 5652 make it unlawful to place or allow pollutants to pass into waters of the state. Fish and Game Code section 5650 makes it unlawful to deposit in, permit to pass into, or place where it can pass into waters of the state any substance or material deleterious to fish, plant life, mammals, or bird life, including, but not limited to gasoline and oil, as well as sediment. Fish and Game Code section 5652 makes it unlawful to deposit in, permit to pass into, or place where it can pass into waters of the state, or to abandon, dispose of, or throw away, within 150 feet of the high water mark of the waters of the state, any garbage, refuse, or waste, among other materials. Cannabis cultivation activities frequently have incidental runoff from over-irrigation, leaks, and spills. Runoff typically includes fertilizers, pesticides, and other deleterious materials that may flow into a stream, resulting in impacts to the riparian habitat and fish and wildlife resources. Therefore, CDFW recommends the City include ephemeral, intermittent, and perennial streams as a sensitive receptor and implement a 150-foot buffer from all streams and incorporate standard stormwater pollution prevention best management practices into project approvals.

**Permit Procedures.** The Ordinance proposes to require a Land Use Permit (LUP), Coastal Development Permit (CDP), or Major Conditional Use Permit (CUP) depending on the cannabis use and site location. It is unclear what the LUP, CDP, and CUP may require in the permitting process. CDFW has the following concerns:

*Pesticide, Herbicide, and Rodenticide Impacts to Sensitive Species* - The use of pesticides, herbicides, and rodenticides for cannabis activities may directly harm or kill plants and wildlife through acute or chronic exposure. In addition, pesticides, herbicides, and rodenticides may impact fish and wildlife through secondary exposure as it moves up the food chain, resulting in reduced reproductive capacity, reduced immune system making animals more susceptible to other diseases, and population declines or local extirpation. Without appropriate control measures, pesticide, herbicide, and rodenticide applications would result in acute or chronic poisoning that may kill or sicken wildlife. Anticoagulants, which are toxins found in major rodent poisons, and other rodenticides can have harmful impacts on non-target species, and secondary poisoning of wildlife may occur. Anticoagulants such as bromadiolone and brodifacoum prevent clotting,

causing animals to bleed to death internally. As these poisons move up the food chain, other wildlife including mammalian predators and raptors are unintentionally poisoned. The City should evaluate the cumulative impacts of increased pesticide, herbicide, and rodenticide use and its effects on the non-target species and develop an Integrated Pest Management Plan to ensure protection of fish and wildlife species.

*Fencing Hazard* - For indoor cultivation, the Ordinance requires "From a public right-of-way, there shall be no exterior evidence of cannabis cultivation except for any signage authorized by the City." Open pipes used as fence posts, property line stakes, and signs may result in wildlife entrapment and mortality because these structures mimic the natural cavities preferred by various bird species and other wildlife for shelter, nesting and roosting. Raptor's talons can become entrapped within the bolt holes of metal fence stakes resulting in mortality. CDFW recommends that all hollow posts and pipes be capped and metal fence stakes should be plugged with bolts or other plugging materials to avoid this hazard. Fencing should not be constructed with materials that are harmful to wildlife including, but are not limited to, spikes, glass, razor, or barbed wire.

**CEQA Compliance.** City staff believes that "an addendum to the General Plan Environmental Impact Report will be appropriated based on the Draft General Plan." CDFW is concerned that cannabis cultivation activities are resulting in, and will continue to result in, substantial adverse impacts to special status species known to occur in the City, which would not be analyzed in the addendum. Special status species include, but are not limited to, those listed or proposed for listing under the California Endangered Species Act (CESA) or Federal Endangered Species Act (ESA), taxa considered by the Department to be a Species of Special Concern (SSC), and species meeting the criteria for listing as described in Section 15380 of the CEQA Guidelines.

The Ordinance's direct and indirect impacts on each special status plant and animal species and their habitats should be thoroughly addressed. Well documented examples of impacts to biological resources associated with cannabis cultivation include the following:

- Erosion may result in sedimentation that leads to downslope impacts on terrestrial and aquatic habitats.
- Artificial lighting may impact wildlife in several ways (i.e., phototaxis), including impacts to navigation, changes in foraging behavior, changes in circadian rhythms (both physiological and behavioral), predator-prey relationships, and suppressed immune response (including increased tumor growth). Impacts have been observed in birds, insects, terrestrial mammals, reptiles, amphibians, fish, and bats. To avoid potentially significant impacts in cases where artificial lighting would be used, the Ordinance and CEQA document should require that artificial light be shielded so that it does not escape beyond the cultivation area and include clear remedies for cases of violation.
- Noise at even moderate levels (40-60 dB) is associated with physiological and behavioral changes in birds, terrestrial mammals, amphibians, and bats. The City should analyze cannabis cultivation related noise contributions to ensure that loud pumps (and generators that are allowed for temporary use) do not significantly impact the local fauna. To avoid or minimize potentially significant impacts, the Ordinance and CEQA document should require use of low-noise technology equipment, or building noise-reducing structures to house noisy equipment.



- Removing individual special status plant species or populations, disturbing associated soil seed banks sustaining populations and their genetic adaptations, clearing suitable habitat occupied by special status plant species, and removing habitats supporting their pollinators and dispersal agents could result in potentially significant impacts.
- Adverse edge impacts typically arise when natural habitats are disturbed and farmed. A small grow site one acre in size or a new greenhouse in a natural habitat area could still result in weed invasions or adversely impact a special status plant or animal population just downslope or nearby. Adverse edge impacts extend varying distances from the source of impact depending upon the issue and location. Establishing protective buffers can effectively minimize adverse edge impacts.

Appropriate species-specific analyses and mitigation measures should be identified and required for each potentially significant impact in an appropriate CEQA document. On-site habitat restoration or enhancement should be considered and detailed for existing cultivation sites where impacts have already occurred unmitigated. If on-site mitigation is not feasible, then off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be considered.

CDFW is also concerned that a CEQA addendum may not provide sufficient analysis for cumulative impacts resulting from new cannabis cultivation sites. The City should assess the aquatic carrying capacity of watersheds to support cannabis cultivation and propose a limit on density of number of cultivation sites. Based on the potential number of cultivation sites that could be allowed in each watershed, the City should define a cap based on the determined watershed carrying capacity. A defined cap on the number of cultivation sites should assume that all parcels meeting zoning criteria could be used for cannabis cultivation.

**Enforcement.** The Ordinance states, “All permitted cannabis use site are subject to review and inspection and inspection from Law Enforcement, Fire Department, and the Building Department or any agents of the State or City charged with enforcement of this Ordinance and any other State or local license.” In regards to revocation and enforcement, “Any entitlement to allow cannabis activities may be revoked” in compliance with other City ordinances as applicable. The inspection section does not provide procedures or timeline for noncompliance issues. CDFW is concerned that without meaningful enforcement and penalties for non-compliance, the number of unpermitted and noncompliant cultivation sites with their associated environmental impacts will continue to increase. CDFW recommends the Ordinance include specific City actions to address noncompliance, including a written statement to applicable agencies if non-compliance is related to regulations outside of the City’s jurisdiction and a timeline for appeals, re-inspections, and follow-up actions. The Ordinance should also include penalties or remedies for permit non-compliance and post-permit environmental remediation.

## **GENERAL COMMENTS**

**Water Use.** Given the high water demand for cannabis cultivation, CDFW is concerned the Ordinance may result in the continued decline of groundwater in the vicinity and related decline of biological resources that depend on its availability. CDFW recommends the City: 1) identify the water source for the cannabis cultivation project and quantify any contribution of

groundwater; 2) evaluate whether use of any ground water would result in adverse impacts to biological resources; and, 3) provide a cumulative analysis to groundwater resources based on project impacts combined with all past, present and reasonably foreseeable probable cultivation projects in the City and surrounding areas (CEQA Guidelines §§ 15065 [a][3], 15130 and 15355). Finally, CDFW recommends the City require each project applicant to monitor and report water use on an annual basis.

**Lake and Streambeds.** CDFW has authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (including vegetation associated with the stream or lake) of a river or stream, or use material from a streambed. In addition, pursuant to Business and Professions Code section 26060.1(b) (3), every license for cannabis cultivation issued by the California Department of Food and Agriculture (CDFA) must comply with section 1602 of the Fish and Game Code or receive written verification from CDFW that a Lake and Streambed Alteration Agreement (LSA) is not required. Therefore, for any such activities, the Project applicant (or "entity") must provide written notification to CDFW pursuant to section 1600 *et seq.* of the Fish and Game Code. Based on this notification and other information, CDFW determines whether an LSA with the applicant is required prior to conducting the proposed activities and whether the issuance of a LSA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA documentation prepared by the City for each cannabis project. To minimize additional requirements by CDFW pursuant to section 1600 *et seq.* and/or under CEQA, the project's environmental document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance and mitigation, monitoring and reporting commitments for issuance of the LSA.

## CONCLUSION

CDFW appreciates the opportunity to comment on the Ordinance to assist the City in identifying and mitigating impacts on biological resources. CDFW requests an opportunity to review and comment on any response that the City has to our comments and to receive notification of the forthcoming CEQA document, if applicable, and hearing date for the Project (CEQA Guidelines; §15073(e)).

Questions regarding this letter or further coordination should be directed to Victoria Tang, Senior Environmental Scientist (Specialist), at (562) 430-5082 or [Victoria.Tang@wildlife.ca.gov](mailto:Victoria.Tang@wildlife.ca.gov).

Sincerely,



Betty J. Courtney  
Environmental Program Manager I

cc: Kevin Hupf, Sr. ES Specialist – CDFW, San Diego  
Victoria Tang, Sr. ES Specialist – CDFW, Los Alamitos  
Christine Found-Jackson, Sr. ES Supervisor – CDFW, Newbury Park

## Deborah Lopez

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**From:** Stuart Kasdin  
**Sent:** Thursday, April 26, 2018 3:44 PM  
**To:** Michelle Greene  
**Cc:** Deborah Lopez; Jennifer Smith  
**Subject:** FW: Cannabis zoning

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### Stuart Kasdin, PhD

Mayor Pro Tempore  
City of Goleta | 130 Cremona Drive, Suite B | Goleta, CA 93117  
805-961-7539 | [skasdin@cityofgoleta.org](mailto:skasdin@cityofgoleta.org)

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**From:** Dusty Lombardi [[maastertech@yahoo.com](mailto:maastertech@yahoo.com)]  
**Sent:** Thursday, April 26, 2018 3:34 PM  
**To:** Stuart Kasdin  
**Subject:** Cannabis zoning

Hello Mr Kasdin,

We wanted to reach out to you to discuss a few of the details before the cannabis meeting tonight. We tried to schedule a meeting with you but understand that you're a busy man, we hope you can take a few moments to read some of the information we wanted to discuss regarding the potential cannabis ordinance.

Thank you for considering our new industry and opportunity in Goleta. Cannabis has always been in the community. We feel that with sensible policy, robust oversight, and proper zoning we can create an industry that benefits Goleta, provides jobs for our community and brings an unregulated industry into the light. To that end, we feel the staff guidance was a good start, but missed out on several opportunities for the city and the industry. Often times these are overlooked because of the stigma associated with them and the unknown, but there is also some inconsistencies with the posted zoning guidelines and staff's proposals.

First, volatile processing involves common gases that are present in your home, home depot, gas stations and other common store fronts that we do business with on a daily basis. These include butane, which is used in every day lighters and sold at store front smoke shops, and propane which is used in nearly every household BBQ grill and sold at most gas stations, Home Depot, and grocery stores. The quantities used are also generally a similar size used in a bbq grill, 5 gallons. These processes are no different than what Dow Chemical, Raytheon or other industrial companies throughout town would be doing in laboratory experiments and processes. These same licensed operations have had zero reported explosions in Colorado and Washington since the inception of their regulated program. With safety protocols and regulation, the process is very safe and is a very integral part of processing in the industry. In fact it's quickly becoming the majority of the cannabis product being sold and consumed. According to the Goleta industrial research, park zoning manufacturing and

compounding of cosmetics, drugs, pharmaceuticals, etc. is a permitted use under 35.233.4 and fits exactly what a cannabis extraction lab would fit with for zoning.

This is an example of an extraction lab (Co2, the only notable difference would be the gas used in the process):

Second, this same type of zoning discrepancy applies with distribution. The business park zoning designation specifically lists #12 as "Storage warehouse and wholesale distributing," yet distribution on the staff recommendation is not included in the business park designation. These are clean and secured facilities with no foot traffic that would ideally fit into these types of buildings, utilizing a front office and a warehouse for fulfillment in the back. Cannabis distribution is done with small sized temperature controlled vans so additional traffic, semi trucks or large scale distribution models are not the same as cannabis distribution.

Finally, we would like to see vertical integration allowed for small business operators. Much like the winery model or brewery model exists for breweries already in town, a vertically integrated model would allow for small businesses to stay competitive in the industry. It would also limit the production to small scale producers less than 10,000 sq ft and fit the 'mom and pop' model that we believe Goleta is striving to maintain. These currently operate in your business park zoning and fit the accessory use definition staff has defined as well as the zoning goals and outlines for the business park designation. As small craft cultivators, it would allow us to operate a vertically integrated, small scale, locally produced, distributed and delivered model that would allow us the opportunity to be competitive with large scale corporate producers. On site consumption could be eliminated as to limit any driving concerns.

We welcome the opportunity to work with staff and council to develop an ordinance that is sensible, maintains a small, limited and local feel and addresses safety and neighbor concerns.

Brian Adams  
Farmily 805