



Lake County Board of Supervisors
255 North Forbes St.
Lakeport, CA 95453

April 9, 2022

Re: Agenda Item 6.9 – a) Consideration of Interim Urgency Ordinance Placing a Moratorium on New Agricultural and Cannabis Cultivation Projects; and b) Consideration of Letter to Governor Newsom Requesting a Halt on New Cannabis Cultivation Licensing Statewide; and c) Consideration of Requesting the Lake County Drought Task Force Discuss, Draft, and Provide Ag/Cannabis Guidelines During Drought Conditions; and d) Consideration of Discussion of Other Actions Regarding Drought

Dear Chair Crandell & Supervisors:

The Lake County Cannabis Alliance is strongly opposed to the proposed moratorium on all new agricultural and cannabis cultivation projects, and urges the Board not to adopt a moratorium on existing projects in the permitting queue.

A 45 day moratorium only seeks to delay discretionary project review without any clear path forward toward solutions. This is a symbolic move without any pragmatic or logical basis.

This blanket approach punishes applicants who happen to be in a later position in line, without any regard for the details of their project and the environmental suitability of their site. Every project currently in line deserves a fair and objective review, based on its compliance with the land use ordinance, and scientifically demonstrated water availability.

In recent months, the Community Development Department has undergone a transformation of leadership and staffing, and applicants are now starting to see the results of a well-equipped and responsive department. We are grateful to Director Darby and Cannabis Program Manager Andrew Amelung for their work in moving applications forward after many have been waiting in line for years. A moratorium would effectively be an end-run around the Community Development Committee's work to build a functional Cannabis program without offering any tangible solutions to the water crisis.

Moratoriums simply don't work. They push potentially compliant projects out of the regulated system and provoke more illicit market activity. It is not the answer and in this case the side effects could be far worse for the County's watershed – resulting in increased unregulated activity while simultaneously reducing the available budget for funding enforcement of environmental violations.

Drought is a reality, and we acknowledge the need for developing strategies to responsibly manage the county's water resources. As farmers, we have the greatest stake in protecting our water supply; we cannot farm without it. Water use is, and should be, determined through a discretionary site-by-site assessment of each project.

If the concern is water, let's better regulate water. This can be done now through practical strategies such as:

- Developing enhanced best management practices with input from the agricultural community including cannabis operators
- Requiring current hydrology studies for all new projects
- Allowing the industry to employ water saving techniques including hoops (without any supplemental light) to reduce water usage

If the board chooses to consider any moratorium, LCCA would support only a limit on new cannabis program applications, while the County continues to process all permits currently in the queue.

Putting a stop to pending applications would be a monumental setback for the county, the businesses that have invested millions of dollars into the permit process and infrastructure. The economic impacts of such an abrupt cutoff will be felt by hundreds of local families and employees. We ask that you continue to work with cannabis and agriculture stakeholders to sustainably manage our water resources, so we can continue to benefit our community.

Thank you for your consideration,

Jennifer K. Smith

Jennifer K. Smith, Board President
Lake County Cannabis Alliance