



**COUNTY OF NEVADA  
COMMUNITY DEVELOPMENT AGENCY  
PLANNING DEPARTMENT**

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**NEVADA COUNTY BOARD OF SUPERVISORS  
Board Agenda Memo**

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**MEETING DATE:** May 7, 2019

**TO:** Board of Supervisors

**FROM:** **Brian Foss, Planning Director**  
**Craig Griesbach, Director of Building**  
**Sean Powers, CDA Director**

**SUBJECT:** Discussion and Direction for Cannabis Ordinance and Final Environmental Impact Report for adoption of an Urgency Ordinance adding Section L-II 3.30 to Article 3 of Chapter II and amending tables L-II 2.2.1.B, L-II 2.2.2.B, L-II 2.3.D, L-II 2.4.D, L-II 2.5.D, and L-II 2.6.F in Article 2 of Chapter II of the Nevada County Land Use and Development Code regarding Cannabis Cultivation and a Resolution for certification of the Final Environmental Impact Report.

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**RECOMMENDATION:** Open the public hearing and provide direction regarding the draft commercial medical cannabis cultivation ordinance and Final Environmental Impact Report (FEIR) and continue the item to May 14, 2019, for final adoption and certification of the FEIR.

**FUNDING:** Drafting of the ordinance and environmental review is funded by the County Unassigned General Fund through the 2018/19 Cannabis Policy and Compliance budget. Permit issuance and compliance in accordance with the adopted ordinance will be funded by permit fees.

**ATTACHMENT:**

1. Draft Resolution for EIR Certification and CEQA Findings of Fact
2. Draft Ordinance for Zoning Ordinance Section L-II 3.30 Commercial Cannabis Cultivation and associated Land Use Tables
3. Planning Commission Staff Report without Attachments

4. Planning Commission Minutes
5. Final EIR (Board of Supervisors only, available online at:  
<https://www.mynevadacounty.com/2188/Supporting-Documents>)

**BACKGROUND:** On April 11, 2017, the Nevada County Board of Supervisors approved a contract with MIG to facilitate an independent and impartial process of gathering community input regarding the development of long-term cannabis regulations. MIG assisted in forming and delivering a stakeholder process to be known as the Community Advisory Group (CAG). Beginning on May 23, 2017, and ending on December 19, 2017, the CAG held ten public meetings and received input for the County's long-term cannabis cultivation regulations.

On January 9, 2018, the Board received the CAG recommendation report but did not take any cannabis policy actions. On February 13, 2018, and March 6, 2018, the Board received presentations and provided direction to staff regarding new long-term cannabis regulations for the unincorporated area of the County. Among other things, the Board directed staff to prepare a draft cannabis cultivation ordinance for review at its first meeting in May and to consider options for issuing temporary licenses.

On May 1, 2018, County staff presented a draft commercial medical cannabis cultivation ordinance to the Board of Supervisors for review and direction. After public testimony and directing staff to make revisions to the document the Board directed staff to begin the RFP process for the preparation of an EIR based on the draft cannabis cultivation ordinance. On June 26, 2018, a contract with Kimley-Horn and Associates Inc. was approved by the Board of Supervisors to prepare the environmental impact report based on the draft ordinance that was reviewed by the Board of Supervisors in May. The draft ordinance contained permitting levels for various sizes of commercial medical cannabis cultivation operations.

On October 23, 2018, County staff presented changes to the draft ordinance that would modify the permitting procedures for commercial cannabis cultivation. The changes included: 1) removing the permit processing requirement for a Conditional Use Permit for cultivation sites over 2,500 square feet up to 10,000 square feet and replace the permit required with an Administrative Development Permit (ADP) for cultivation sites sized from 2,500 square feet to 10,000 square feet of canopy cover and; 2) require a Commercial Cannabis permit (CCP) and annual permit for cultivation sites less than 2,500 square feet. The Board directed staff to make the modifications to the ordinance and include the revised permitting levels for the environmental analysis.

A Final Environmental Impact Report (FEIR) was prepared by Kimley-Horn, the environmental firm retained by the County to undertake the preparation of the environmental document on behalf of the County for the Commercial Cannabis Cultivation Ordinance project. The FEIR reviewed all the potential environmental impacts associated with the project. To help identify those potential impacts, a Notice of Preparation (NOP) was circulated to various state and local agencies prior to preparation of the Draft EIR. The responses to the NOP are included in the appendices of the Draft

EIR and the comments from the comment period for the Draft EIR are included in the Final EIR. A 45-day public review period was provided to allow agencies and the public to submit written comments regarding the adequacy of the Draft EIR. The EIR comment period opened on Friday, January 11, 2019 and closed on Monday, February 25, 2019, at 5:00 PM. An errata was also prepared to identify the changes and amendments to the FIER based on the comments received and all comments were responded to in writing as part of the FEIR.

**DRAFT CANNABIS CULTIVATION ORDINANCE:** The Nevada County Commercial Cannabis Cultivation Ordinance is intended to detail County regulations consistent with state law to enable a structured and logical management procedure for the cultivation of cannabis within all unincorporated areas within the County. Commercial cannabis cultivation would be strictly limited for medical purposes. The proposed ordinance has been written, in part, to remedy existing issues including environmental degradation to water quality, creation of objectionable odors, land use conflicts, and impacts to the visual character of the County. The ordinance establishes certain requirements for land use permits and the annual permitting process. Under the proposed project there will be a three-tier system for 1) personal use; 2) commercial use, and 3) non-remuneration cultivation use. The regulations for cultivation of cannabis have been developed to be consistent with requirements of other commercial activities as well as consistent with state law. Under the proposed project cannabis cultivation would be managed using the policies and regulations within the ordinance. Based on these and other factors, the general intent of the proposed project is to result in:

- Removing or reducing cannabis cultivation in residential areas and allowing increased cannabis cultivation in the AG, AE and FR zones, including commercial cultivation for medical purposes.
- Eliminating the existing set of regulations intended for personal and/or cooperative cannabis cultivation and replacing these regulations with a three-tier system based on the nature of the cultivation activity at issue (personal, commercial or non-remuneration cultivation), to align with current State law.
- Adding requirements for certain land use permits (for the property on which cultivation would occur) and an annual regulatory permit (for the cannabis operation). This facilitates issuance of local authorizations and align cannabis regulations with regulations applicable to other commercial activities.
- Updating definitions and other technical requirements to align with current State law and addressing environmental impacts related to cultivation.
- Revising and increasing penalties for failing to comply with County cannabis regulations including increased fines, permit revocations and criminal penalties.

*Table 1: Cannabis Cultivation for Personal Use*, below provides a breakdown of the allowable number of plants based on zoning, parcel acreage, and cultivation method. Cultivation in all other zones would not be a permitted use.

Table 1: Cannabis Cultivation for Personal Use				
Zoning	Parcel Acreage	Cultivation Method		
		<i>Indoor</i>	<i>Mixed-Light</i>	<i>Outdoor</i>
<b>R1 R2 R3 RA (Residential Designation)</b>	Parcel of Any Size	Maximum of six plants, mature or immature.	Cultivation is Prohibited	Cultivation is Prohibited
<b>R-A (Rural and Estate Designation)</b>	5.00 Acres or greater	Maximum of Six Plants, mature or immature		
<b>AG AE FR TPZ</b>	1.99 or less	Maximum of Six Plants, mature or immature	Cultivation is Prohibited	Cultivation is Prohibited
	Parcels 2.00 acres or greater	Maximum of Six Plants, mature or immature		

*Table 2: Cannabis Cultivation for Commercial Use*, below, provides a breakdown of the of the allowable square feet of allowable plants canopy based on zoning, parcel acreage, and cultivation method.

Table 2: Cannabis Cultivation for Commercial Use				
Zone	Parcel acre	Cultivation Method		
		Indoor	Mixed-Light	Outdoor
R1 R2 R3 RA (Regardless of Zone Designation)	Parcel of Any acreage	Commercial Cultivation is Prohibited		
AG AE FR	2.0 acres or less	Commercial Cultivation is Prohibited		
	Parcels 2.00 acres to 4.99 acre	Maximum of 500 sf canopy	Commercial Cultivation is Prohibited	
	Parcels 5.00 acres to 9.99 acres	Up to a maximum of 2,500 sf of canopy for any method or combination thereof.		
	Parcels 10.00 acres to 19.99 acres	Up to a maximum of 5,000 sf of canopy for any method or combination thereof.		
	Parcels 20 acres or greater	Up to a maximum of 10,000 sf of canopy for any method or combination thereof.		

## CULTIVATION AREA REQUIREMENTS

In addition to the zoning restrictions discussed above, the proposed project also includes elements and requirements that involve all cultivation areas. These regulations are in place to provide a defined process and to detail requirements related to cannabis cultivation. Additional details and requirements for persons engaging in cultivation for personal use of cannabis and commercial cannabis cultivation are within the attached copy of the full proposed NCCO in Attachment 2 and are summarized as follows:

- Adequate site security.
- Cannabis cultivation shall not adversely affect the health, safety, or general welfare of persons at the Cultivation site or at neighboring parcels.
- All electrical, mechanical, and plumbing have been installed with valid permits.
- Cultivation of cannabis indoors shall contain effective ventilation, air filtration and odor-reducing or odor-eliminating filters to prevent odor, mold and mildew in any area used for Cultivation or which is used as, designed, or intended for human occupancy, or on adjacent premises.
- All structure and site utilities (plumbing, electrical, and mechanical) shall comply with the California Building Standards Codes, as adopted by the County of Nevada.
- All lights shall comply with the requirements of Section L-II 4.2.8.D. of the Nevada County Land Use and Development Code. Lights are not permitted to be detectable during the night time hours. If lights are to be used during night time hours, black out or light barriers must be used to ensure no light is visible during night time hours.
- Noise levels generated by Cultivation shall not exceed the standards set forth in Table L-II 4.1.7 (Exterior Noise Limits) of the Nevada County Zoning Ordinance applicable to the Land Use Category and Zoning District for the Premises on which the Cultivation occurs.
- Permits issued to legal owner of property or owner authorization.
- Comply with Hazardous Materials thresholds and permitting requirements.
- Demonstrate a legal and permitted water and sewage disposal source.
- Obtain appropriate State permits.
- A maximum of three (3) Cultivation permits will be issued per person or entity for purpose of engaging in Commercial Cannabis Activities. No person or entity may have any financial interest in more than eight (8) Commercial Cannabis businesses and/or enterprises in Nevada County.

- A Primary Caregiver may cultivate no more than five hundred (500) square feet of Canopy per Qualified Patient for up to five (5) specified Qualified Patients for whom he or she is the Primary Caregiver.
- Cannabis Support Areas are limited to a maximum area equal to 25% of the overall Canopy Area. The Support Area boundary shall be clearly identified on any plans that are submitted and on the Premises.

## ACCESSORY STRUCTURES

Accessory structures used for the cultivation of cannabis would need to meet all of the following criteria:

- The Accessory Structure must be permitted and meet required setbacks.
- All electrical services shall be permitted and permanently installed.
- Accessory Structures used for indoor cultivation shall be equipped with a permanently installed and permitted odor control filtration and ventilation system adequate to prevent any odor, humidity, or mold problem within the structure, on the Parcel, or on adjacent Parcels.
- Any structure used for Indoor Cultivation shall have a complete roof enclosure and be fully enclosed.

## REQUIRED PERMITS

The permitting of commercial and non-remuneration cannabis activities is defined in the proposed NCCO. The proposed NCCO lists the permitting requirements for locations that would be engaged in commercial and non-remuneration cannabis activities. The types of permits that would be needed include either a CCP or an ADP, in addition to an ACP. A summary of these permits is provided in the table below:

<b>Cannabis Cultivation Permit</b>	A CCP would be required for commercial cultivation activities for all canopy sizes up to 2,500 sf. An ADP would apply to all indoor, mixed-light, or outdoor cultivation. An ADP would only be issued to the legal owner of the parcel of premises.
<b>Administrative Development Permit</b>	An ADP would be required for commercial cultivation activities for all canopy sizes to between 2,501 sf to a maximum of 10,000 sf. An ADP would apply to all indoor, mixed light, or outdoor cultivation. An ADP would only be issued to the legal owner of the parcel of premises.

<b>Annual Cannabis Permit</b>	An ACP would be issued to the individual or entity engaging in the commercial cannabis activity or non-remuneration cultivation and must be renewed annually.
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Applications and check lists have been developed to ensure that site plans and applications are completed and contain the necessary information to meet ordinance requirements. The requirements include a detailed site plan that shows the proposed canopy and support areas, all of the sensitive environmental resources including, watercourses, oak resources, important farmlands and any other biological resources on the site. The application is required to include biological pre-screening information, a cultural resources determination and identify the source of water, wastewater disposal and electrical sources in addition to a site security plan, lighting control plan and secondary access information for fire access. All of the information required is intended to ensure that impacts of the proposed project will be mitigated and not create a nuisance to neighboring properties and to ensure environmental impacts will be mitigated.

### VARIANCES AND SETBACK EASEMENTS

In the event that the cultivation area or support areas do not meet the setback requirements of the Ordinance, the applicant may propose use of an easement agreement with an adjacent property owner or obtain a setback variance in order to satisfy the setback requirements (a “Setback Easement” or “Setback Variance”). Setback Easements and/or Variances relating to Indoor, Mixed-Light and Outdoor Cultivation and Support Areas will be granted and issued at the discretion of the Permitting Authority. Variances will only be granted consistent with the requirements contained in Sec. L-II 5.7 of the Nevada County land Use and Development Code in addition to a finding that odor impacts would not be increased as a result of the reduced setback.

### SENSITIVE SITES

Cultivation will not be allowed within 1,000 feet of sensitive sites. Current State law requires a setback from schools, daycare centers, and youth centers. Accordingly, the proposed NCCO defines a sensitive site to include a school, church, park, child or day care center, or youth-oriented facility. A youth-oriented facility is defined as any facility that caters to, or provides services primarily intended for, minors, or the individuals who regularly patronize, congregate or assemble at the establishments are predominantly minors. The proposed NCCO includes provisions for the consideration of locating a sensitive use in proximity to a cannabis cultivation area and mechanism for disseminating information to the cultivators.

The Permitting Authority has the discretion to authorize construction of an Accessory Structure a distance less than 1000 feet from a state and/or federal Park if the following criteria are met:

- the proposed site is at least 300 feet from the property line of the State or Federal Park; and
- the portion of the State or Federal Park that is adjacent to the Parcel or Premises upon which the Accessory Structure is proposed to be constructed is inaccessible by the public and is unimproved.

**ADDITIONAL ORDINANCE AMENDMENTS:** The addition of the proposed Commercial Cannabis Cultivation section to the Land Use and Development Code necessitates other modifications within the Code for internal consistency. The Land Use zoning tables are proposed to be amended to reflect the zoning districts that allow and do not allow commercial cannabis cultivation in accordance with the proposed Ordinance. The proposed amendments are included in Exhibit B of the Ordinance (Attachment 2).

**CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA):** A Final Environmental Impact Report (FEIR) was prepared by Kimley-Horn, the environmental firm retained by the County to undertake the preparation of the environmental document on behalf of the County for the Commercial Cannabis Cultivation Ordinance project.

The FEIR reviewed all the potential environmental impacts associated with the project. To help identify those potential impacts, a Notice of Preparation (NOP) was circulated to various state and local agencies prior to preparation of the Draft EIR. The responses to the NOP are included in the appendices of the Draft EIR and the comments from the comment period for the Draft EIR are included in the Final EIR. A 45-day public review period was provided to allow agencies and the public to submit written comments regarding the adequacy of the Draft EIR. This EIR comment period opened on Friday, January 11, 2019 and closed on Monday, February 25, 2019, at 5:00 PM. An errata was also prepared to identify the changes and amendments to the FIER based on the comments received.

The FEIR analyzed the following potentially significant environmental impacts areas that may be impacted by the project:

Aesthetics	Agriculture and Forestry	Air Quality
Biological Resources	Cultural and Tribal Resources	Energy Conservation
Geology and Soils	Greenhouse Gas Emissions	Hazards, Hazardous Material
Hydrology and Water Quality	Land Use and Planning	Mineral Resources
Noise	Population and Housing	Public Services
Recreation	Transportation and Traffic	Utilities and Service Systems
Cumulative Impacts	Growth Inducing Impacts	

Implementation of the proposed mitigation measures would reduce these impacts to a less than significant level, with the exception of Aesthetics, Agricultural Resources, Air Quality, Biological Resources, Hydrology and Water Quality, Land Use and Planning,

Utilities and Service Systems and Energy in which there are significant and unavoidable impacts.

### OVERRIDING CONSIDERATIONS

Since the EIR identified significant and unavoidable impacts the Board of Supervisors will need to make findings that the Project and its benefits to Nevada County outweigh its unavoidable significant environmental impacts. The Board must find that the benefits of the “proposed project outweigh the unavoidable adverse environmental effects,” and therefore, “the adverse environmental effects may be considered ‘acceptable’” [CEQA Guidelines Section 15093(a)]. The Board must find that any one of these considerations override, on balance, the cumulative significant negative environmental impacts of the project. The substantial evidence supporting these various considerations is found in the FEIR and the CEQA Findings of Fact included as Attachment A of the Resolution. The overriding considerations are as follows:

1. Provision for a regulated and viable cannabis industry in the unincorporated area of Nevada County.
2. Expansion of the production of medical cannabis in the unincorporated area of Nevada County.
3. Reduction of Nuisance Activities Related to Commercial Cannabis Production in the unincorporated area of Nevada County.
4. Protection of residential and sensitive populations in the unincorporated area of Nevada County.
5. Protection of sensitive natural resources in the unincorporated area of Nevada County.
6. Provision of an enforcement mechanism and funds necessary to abate illegal and unlicensed activities in the unincorporated area of Nevada County.

**PLANNING COMMISSION ACTIONS AND RECOMMENDATIONS:** At the April 11, 2019 Planning Commission meeting the Planning Commission recommended approval of the Final EIR and Ordinance for Cannabis Cultivation by a vote of 4-0, 1 absent. The Planning Commission made additional recommendations to the Board of Supervisors for consideration regarding the following issues:

*Certificate of Deposit:* The draft ordinance requires the submittal of a \$5,000.00 Certificate of Deposit to be used for restoration for environmental damage if the owner/applicant is unable/unwilling to correct any damage. The Planning Commission recommended that the method of posting the financial assurance be changed to a bond structure or surety bond as another option/instead of the Certificate of Deposit. The Board may direct staff to amend the ordinance to allow for additional types of financial assurances, remove the CD and bonding requirements altogether or provide other direction.

*Financial Interest:* The draft ordinance presented to the Planning Commission included a requirement that no person/entity shall have a financial interest in more than 3 commercial cannabis businesses and/or enterprises in the County. The intent is to allow

the small farmer an opportunity to successfully cultivate and to not allow larger financial entities to create a monopoly on the market. The Planning Commission recommended that the Board of Supervisors review this requirement and potentially increase the number of financial interests allowed or remove this restriction completely. The current draft ordinance increases that number to a maximum of eight (8) financial interests in response to the Planning Commission direction and input from the Cannabis Alliance.

*Support Areas:* The draft ordinance defines support areas as “an area associated with immature plants, drying, curing, grading, trimming, rolling, storing, packaging, and labeling of non-manufactured cannabis products.” The draft ordinance limits this area to be a maximum of 25% of the size of the permitted canopy area. This area was included in the draft ordinance to add areas for support activities as it was recognized that these areas are needed as part of cannabis business operations. This was also needed to include this area to be part of the environmental analysis in the Cannabis Environmental Impact Report (EIR) or the support area activities would have been included in the allowed canopy area only as part of the global assessment of environmental impacts. This additional area was recognized as a need by staff, stakeholders, and consultants and was added to the draft ordinance. There have been many concerns from the cannabis community that this size allowance for support area activities is not large enough for typical cannabis business operations. After review of this requirement by staff, consultants, and Counsel an option to allow greater support area allowances while not impacting the EIR would be the following:

- New support areas would be allowed to be 25% of the allowable canopy area. Any existing structures constructed and completed prior to cannabis ordinance adoption could be used for additional support areas up to an additional 50% of the canopy area. This would allow for additional support areas up to a total of 75% of the canopy area without any new specific site impacts or impacts to the Cannabis EIR. New support areas would be new designated exterior areas or new structures constructed and completed or structures in the process of being constructed after ordinance adoption. All existing structures constructed and completed prior to ordinance adoption would be required to be fully permitted based on the specific support area uses and occupancy types per the requirements in the California Building Standards Codes.

The 25% maximum support area size requirement was included in the environmental analysis, but the number was not calculated in a finite detail for every potential cannabis permit that could be issued. The limitation was discussed and identified to ensure that there were some limitations on the disturbance areas associated with cannabis cultivation in order to reduce potential environmental impacts. There is some flexibility in the number due to the more qualitative nature of the environmental analysis and impacts for this issue. The Board may elect to increase the allowable support area however, the larger the increase the more the potential exists for a challenge regarding the adequacy and completeness of the Final EIR. Staff has presented an option that would increase the support area without any foreseeable new environmental impacts, but the Board could also provide direction to increase the allowed percentage.

*Non-Remuneration:* The draft ordinance identifies non-remuneration activities and allows that type of cultivation in accordance with all commercial cannabis permitting requirements identified in the ordinance including permitting types, fees and size limitation, zoning requirements and setbacks. At the May 1, 2018 Board of Supervisors hearing the Board discussed the possibility of reducing fees for non-remuneration permits. The Board may direct staff to create a reduced fee schedule specific to non-remuneration activities or make additional amendments to the ordinance for these types of operations.

*Transition Period:* The draft ordinance allows for improvements and violations not associated to commercial cannabis activities to be included in a two-year transition plan to bring a parcel into full compliance if there are not any fire and life safety hazards associated to those improvements. The cannabis community has concerns that this is too restrictive, and cannabis associated improvements should be allowed in the transition period. The California Building and Fire Codes as well as other adopted County Ordinances do not allow any improvements to be used and/or occupied prior to being fully permitted, obtaining required inspections, and receiving a final certificate of occupancy. The Planning Commission recommended that the Board of Supervisors consider allowing “low-impact” grading in the transition period for outdoor cultivation sites.

*Urgency Ordinance:* The Planning Commission recommended that the Board of Supervisors adopt the Cannabis Cultivation Ordinance as an Urgency Ordinance if the appropriate findings could be made in order to expedite the permitting of cultivation and in order to meet the needs of the cultivators to plant as soon as possible within the appropriate Spring season. The proposed ordinance is presented to the Board as an Urgency Ordinance that could go into effect immediately upon adoption.

*Existing Permitted Accessory Structures:* The draft ordinance requires that any and all accessory structures used in the cultivation operations be setback a minimum of 100 feet from the property lines. The ordinance allows for setback easements and variances as a method to reduce this setback if the required findings can be made. The Planning Commission recommended that the Board of Supervisors consider allowing existing permitted structures that are less than the 100 feet setback to property lines be used for cannabis operations.

*Setbacks for Parcels  $\geq 20$  acres:* The Planning Commission discussed the potential to require larger setbacks for parcels in excess of 20 acres. The discussion included a potential requirement that the cultivation area be located closer to the house onsite than any neighboring house. The discussion included a potential setback of 300 feet for the larger parcels or be based on adjacent parcel sizes. The Planning Commission did not reach a consensus on any proposed alternatives and recommended that the Board of Supervisors be made aware that the discussion and that alternative considerations occurred. At this time, staff is not recommending any changes to the setback requirements.

**Summary:** The Commercial Cannabis Cultivation ordinance has been in the drafting process for two years based on direction from the Board of Supervisors and through public involvement including the Community Advisory Group process and Planning Commission hearings. Following the May 1, 2018 Board meeting, staff has completed an abundance of activities to finalize the draft cannabis ordinance, manage the completion of the Final Environmental Impact Report (FEIR), create permitting and enforcement processes from the ground up, and implementing a cannabis permit pre-application process. Staff have completed over 110 formal meetings with stakeholders including but not limited to state agencies, the Cannabis Alliance, homeowners' associations, fire districts, Sheriff's office, County Counsel, County departments and agencies, County residents, neighboring cities, Nevada County Contractors' Association (NCCA), and Nevada County Association of Realtors (NCAOR). Staff has held six (6) formal workshops over the last five (5) months during and after work hours regarding cannabis and land use permitting/regulations. Staff implemented a cannabis permitting process based on interim ordinance in August of 2018, a temporary local authorization process in October of 2018, and a pre-application process based on the draft ordinance in March of 2019. At this time, staff has accepted preliminary applications and provided guidance and feedback to the applicants so that upon adoption of the ordinance cannabis cultivation permits will be ready to be issued.

Staff recommends that the Board of Supervisors hold a public hearing and provide any direction to staff for modifications to the draft ordinance and continue the item to May 14, 2019 for the final adoption of the ordinance and certification of the Final Environmental Impact Report.

**Approved by:** Brian Foss, Planning Director  
Craig Griesbach, Director of Building  
Sean Powers, CDA Director