LOS ANGELES COUNTY
CONSUMER & BUSINESS AFFAIRS

Board of Supervisors

Hilda L. Solis
First District

Holly J. Mitchell
Second District

Lindsey P. Horvath
Third District

Janice Hahn
Fourth District

Kathryn Barger
Fifth District

Director
Rafael Carbajal

Chief Deputy
Joel Ayala

February 25, 2025

To: Supervisor Kathryn Barger, Chair
Supervisor Hilda L. Solis
Supervisor Holly J Mitchell
Supervisor Lindsey P. Horvath
Supervisor Janice Hahn

From: Rafael Carbajal
Director

TWELFTH QUARTERLY REPORT REGARDING IMPLEMENTATION OF AN EQUITABLE COMMERCIAL CANNABIS REGULATORY FRAMEWORK (ITEM NO. 6, AGENDA OF FEBRUARY 15, 2022) AND OTHER ACTIVITIES RELATED TO THE LEGALIZATION OF CANNABIS (ITEMS NO. 3 AND NO. 9, AGENDA OF FEBRUARY 7, 2017; ITEM NO. 20, AGENDA OF MAY 21, 2019)

On February 15, 2022, your Board directed the Department of Consumer and Business Affairs (DCBA) and its Office of Cannabis Management (OCM), in consultation with relevant County departments, to proceed with the development of a commercial cannabis regulatory framework and an equity program outlined in the Updated Framework and Recommendations for Regulating Commercial Cannabis in Unincorporated Los Angeles County report (December 2021).[1] Your Board further directed OCM to coordinate with relevant County departments to provide written status updates on a quarterly basis.

In accordance with your Board motion, OCM has filed quarterly reports since May 16, 2022.[2] These reports also combine other updates regarding Cannabis Legalization (Items No. 3 and No. 9, Agenda of February 7, 2017) and the

[1] Office of Cannabis Management Report, Updated Framework and Recommendations for Regulating Commercial Cannabis, December 20, 2021: http://file.lacounty.gov/SDSInter/bos/supdocs/166359.pdf
[2] Office of Cannabis Management Quarterly Reports (May 16, 2022, August 15, 2022, November 18, 2022, February 17, 2023, May 15, 2023, August 14, 2023, November 15, 2023, February 15, 2024, May 15, 2024, August 14, 2024, and November 18, 2024): https://file.lacounty.gov/SDSInter/bos/supdocs/166488.pdf

Implementation of the Unlicensed Cannabis Business Closure Plan (Item No. 20, Agenda of May 21, 2019)[3] into a single consolidated report to your Board.

This report provides your Board with the latest quarterly program update on the following items:

- Social Equity Program development;
- Ordinance development, including updates and next steps related to public feedback on draft ordinances, and business license application software build-out;
- Public education and outreach efforts; and
- Unlicensed cannabis business enforcement efforts and emerging cannabis-related enforcement issues.

SOCIAL EQUITY PROGRAM

OCM continues to work with the Department of Economic Opportunity (DEO) on the design of the Social Equity Program and planning for implementation and delivery of program services. OCM is incorporating lessons learned from other jurisdictions in the development of the program to help address known pitfalls from other programs. Ongoing challenges remain around identifying additional funding to support key program offerings in part due to continued federal prohibition and stigma around cannabis businesses. As previously reported, the Social Equity Program will be unable to meet intended outcomes without key program support, especially providing access to capital for selected social equity operators. OCM will continue to work with DEO and other partners on this critical issue.

REGULATORY FRAMEWORK

Ordinance Development

Summary of Public Comment Feedback

OCM closed its 45-day Public Comment period on November 15, 2024, after a series of community meetings that took place throughout the second half of 2024. The Public Comment period, held from October 1 through November 15, 2024, provided an extended opportunity for stakeholders to review and comment on the proposed program and draft zoning ordinance and business operating requirements.

[3] Consolidated Cannabis Legalization and Implementation of Unlicensed Business Closure Plan Reports: http://file.lacounty.gov/SDSInter/bos/supdocs/111534.pdf

OCM received over 350 comments via email, letters, and an online form that reflected a broad spectrum of community interests, with 94 percent of comments submitted by e-mail (63%) and the online form (31%). In total, OCM conducted 21 community meetings, presentations, and discussions to nearly 500 community members and community organizations throughout the County from July through December 2024. Nearly half of the comments submitted were primarily from four main communities within the Second and Fifth Supervisorial Districts. These included comments from individuals and organizations from Ladera Heights, El Camino Village, Newhall, and Stevenson Ranch. Some community groups created templates to outline their concerns and general opposition, which were widely circulated within their networks and submitted by multiple individuals, resulting in a significant number of identical comments.

The feedback received during the Public Comment period revealed several key themes. A detailed description of these themes can be found in *Attachment I* and are summarized below.

- **Buffers from Youth-Oriented Uses**. Many members of the community desired increased buffer distances between cannabis businesses and youth-oriented uses such as schools, parks, and daycares. While the proposed 600-foot buffer was supported by some, most respondents advocated for expanding it to 1,000 feet or more from these locations, as well as residential areas. This may be in part due to comparisons with other jurisdictions that have buffer zones larger than 600 feet.

  It is worth noting that the proposed 600-foot buffer zone is consistent with State law[4] and the County's standard for alcohol retail outlets.[5] As such, any cannabis business would only be allowed in commercial, commercial-only mixed use, industrial, and institutional zones under the current draft regulations. Additionally, buffer zone distances for the unincorporated areas of the County have been extensively assessed since 2018, including buffers from very common uses such as residential areas and places of worship. As noted in previous reports, analyses of these buffers revealed that larger buffers from very common uses either resulted in a *de facto ban* on cannabis businesses, or a concentration of these businesses in industrial and industrial-adjacent areas. These areas tend to be in lower income neighborhoods in the First and Second Supervisorial Districts, and in the Antelope Valley in the Fifth Supervisorial District, where properties tend to be relatively large and spread apart. Consequently, increasing buffer distances specific to unincorporated areas with limited existing zoning availability may result in relegating more businesses to certain economically and health-disadvantaged communities.

[4] California Business and Professions Code, Section 26054
[5] Los Angeles County Code Chapter 22.140.030

- **Definition of Youth-Oriented Use.** Another key theme that emerged in comments were recommendations to broaden the definition of Youth-Oriented Use to include more businesses that cater to youth, such as karate, dance studios, and churches. Currently, a Youth-Oriented Use is defined as, "a land use where youth under the age of 18 are most likely to spend time, including public or private schools, child day care centers, public libraries, public parks, and public recreational facilities."

  Broadening the current definition may present implementation challenges due to more discretionary decision-making. As an example, "youth centers" are vaguely defined under State law and difficult to identify in practice.[6] Whereas, schools, public parks, libraries and daycares were identified through verifiable publicly accessible government databases and considered appropriate proxies for primary areas where youth commonly congregate. Utilizing reliable databases can help minimize vagueness that may appear arbitrary and add layers of complexity for determining buffers.

- **By-Right/Ministerial Approval Process.** Concerns about the by-right or ministerial land-use approval process also emerged frequently in public comments. Many stakeholders favored implementing a Conditional Use Permit (CUP) to allow for greater community input and site-specific reviews.

  The proposed land use regulations provide for ministerial review of cannabis businesses which incorporate uniform and objective development standards. This approach applies clear and predetermined zoning and development criteria and maintains consistency, efficiency, and objectivity in the review process to ensure that businesses exist in areas where they meet those development standards.

  To lawfully establish and operate cannabis businesses in the unincorporated communities of the County, businesses must comply with zoning requirements and development standards in Title 22 and business license requirements and operating standards under Title 8. Additionally, licensed operators must meet public health and safety requirements in Title 11 and obtain any necessary permits or clearances from Public Works, Fire, and Agricultural Commissioner/Weights and Measures. This differs from the CUP process, which is inherently subjective and can lead to inconsistent outcomes since it looks at a particular location. Over time, this can result in a patchwork of discretionary developments, each with their own set of unique conditions. The CUP process can also be used to either block cannabis businesses in certain areas or allow them in locations where communities lack the resources or expertise to challenge a proposed use. Finally,

[6] Health and Safety Code section 11353.1(e)(2) defines a "youth center" as "any public or private facility that is primarily used to host recreational or social activities for minors, including, but not limited to, private youth membership organizations or clubs, social service teenage club facilities, video arcades, or similar amusement park facilities."

while a CUP is commonly used to approve cannabis businesses in other jurisdictions and is also the County's land-use approval process for alcohol retail outlets, it is worth noting that it is not a location ban on alcohol retail outlets.[7] Collectively, the ministerial process combined with coordinated application processes is likely to result in a more uniform and efficient program than the CUP process.

- **Youth-Impact Concerns.** Some communities expressed strong and organized opposition to any cannabis business activity due to potential impacts on public safety, neighborhood character, and youth exposure.

  Preventing youth access is a priority for the County's program. Accordingly, proposed regulations incorporate strict operating requirements for licensed businesses in alignment with State law, including bans on cannabis advertising within 1,000 feet of any Youth-Oriented Use, using child-resistant packaging, ensuring product labels are not appealing to children, and robust security measures such as electronic age verification upon entering a retailer and again at the point of sale.

- **Public Health and Safety Concerns.** Commenters also highlighted risks associated with increased crime, impaired driving, and secondhand smoke exposure. Many called for robust enforcement measures and dedicated resources to address these concerns.

  The approved regulatory framework incorporated recommendations from Public Health's 2019 Health Impact Assessment.[8] This includes allowing a maximum of 25 cannabis storefronts Countywide, with no more than five licensed stores in any one Supervisorial district, which is roughly one third of the recommended number (one dispensary per 10,000-15,000 residents or 66-100 dispensaries in unincorporated areas). The draft operating requirements also include strict security measures, good neighbor policy, and compliance checks during routine inspections and annual renewals. Regarding enforcement measures, OCM continues to work with enforcement agencies to advocate for more resources to address the unlicensed operations prevalent within unincorporated communities (see *Unlicensed Cannabis Business Enforcement* in this report).

---

[7] Title 22 requires findings for alcoholic beverage sales outlets through a CUP process, that the proposed location(s) do not "adversely affect the use of a place used for religious worship, school, park, playground or similar use within a 600-foot radius." Consequently, an alcohol outlet may locate close to places used for religious worship, schools, parks, playgrounds or similar uses provided that the CUP contains conditions that mitigate against possible impacts.

[8] Health Equity Implications of Retail Cannabis Regulations in Los Angeles County: Health Impact Assessment: http://publichealth.lacounty.gov/chie/reports/Cannabis_HIA_Final_7_15.pdf

- **General Zoning and Land-Use.** Stakeholders also voiced apprehension about the overconcentration of industrial cannabis operations in certain areas where industrial zones are prevalent. Other communities advocated for restrictions on retail storefronts in additional Specific Plans.
  OCM worked closely with Planning on the proposed zoning and land-use regulations. In the development of Title 22 amendments, Planning carefully considered and reviewed Specific Plans and ultimately ensured commercial cannabis zoning would be consistent with the General Plan and existing standards for other similar businesses like tobacco shops, vape shops, cigar shops, and hookah lounges.

- **Other Themes:** Stakeholders also proposed enhancements to existing business requirements such as expanding community notification requirements under the good neighbor policy, strengthening corporate social responsibility commitments, and revising employee definitions to align with state standards. Additionally, some public comments also addressed themes outside of the draft ordinances, such as feedback on the social equity program, and allocation of cannabis tax revenue for community reinvestment.

OCM is committed to developing balanced regulations that address concerns with community health and safety, administrative feasibility, and business viability. Acknowledging community concerns, OCM is evaluating the draft zoning and administrative ordinances for potential revisions. Potential policy options will continue to consider health and social equity impacts, as well as the effects of overly restrictive buffers and regulations known to contribute to continued unlicensed operations and further exacerbate health risks.

OCM will work with your Board offices to evaluate potential policy options that remain consistent with your Board's motion and priorities.

Initial Study and Notice of Preparation

In November 2024, OCM worked with Planning to distribute the draft Initial Study (IS)[9] to relevant County departments. County departments were given 30 days to review the IS and provide their feedback. Pertinent feedback was consolidated and used to revise and finalize the IS draft where appropriate.[10] OCM is also working closely with its environmental consultant to prepare for the public noticing process in accordance with CEQA by developing e-mail communications, website and social media content, and tribal notifications.

[9] As previously reported, the Initial Study serves as a preliminary analysis to identify potential environmental impacts that will guide the development of the Environmental Impact Report.

[10] Feedback most pertinent for the Initial Study primarily centered on clarifying terms used within the Initial Study, such as the term 'existing structures' versus 'permitted structures'.

A Notice of Preparation (NOP)[11] is also being finalized alongside the IS in preparation for the Environmental Impact Report (EIR). A public review and scoping period lasting between 30 to 45 days will be initiated after filing the IS/NOP with the Governor's Office of Planning and Research (OPR), State Clearinghouse Unit. Midway through this scoping period, OCM plans to host a Public Scoping Meeting to gather feedback on the scope and content of the EIR.

A key component of the IS/NOP is the Project Description which is based on a combination of elements derived from the draft zoning, licensing, and administrative ordinances. Changes to these elements such as an expansion of the definition of Youth-Oriented Use would require changes to the Project Description. Such changes should be made before an NOP is filed with the State; otherwise, a revised NOP would have to be re-submitted resulting in project delays of 30 days or more. As a result, potential ordinance revisions must be made prior to finalizing the NOP and initiating the public scoping and review period.

Software Business Solution

Since the last quarterly update, OCM has completed the initial build-out of the online Cannabis License Application portal. Through testing, OCM will continue to make minor refinements and enhancements to key modules, including the Social Equity Application, Business Ownership Review, and Preliminary Location Review to ensure usability, efficiency, and alignment with workflows, and program requirements.

In early December 2024, OCM and DCBA's Information Technology (IT) team presented to the Los Angeles County Electronic Permitting and Inspections (EPIC-LA) Steering Committee to receive approval to integrate the County's permitting system with OpenGov. These efforts aim to streamline the County permitting and entitlement process through data-sharing between the two systems. The EPIC-LA Steering Committee is scheduled to vote on approval of data integration on February 11, 2025.

OCM and IT team also submitted an Assessment Questionnaire for the eCommerce Readiness Group/Governance's (ERG) review and approval. The Questionnaire summarizes the project scope and demonstrates compliance with County ecommerce standards. Review and approval of the Questionnaire is scheduled to be completed by the end of February 2025.

[11] The Notice or Preparation is a formal notice to inform responsible agencies that the County is preparing an Environmental Impact Report.

OCM will continue to test and revise each application module and monitor the ERG Assessment Questionnaire until final approval. OCM will also initiate Geographic Information System (GIS) and financial systems integration with OpenGov for efficient application review and fee reconciliation.

PUBLIC EDUCATION AND OUTREACH

OCM continues developing educational workshops in collaboration with Public Counsel. The workshops will provide critical business and legal education for individuals interested in becoming social equity operators. The content of the workshops will focus on helping participants navigate entry into the legal marketplace, with a particular emphasis on the unique challenges faced by social equity business operators. This includes education on the fundamentals of business structure and choice of entity formation, contract law, commercial real estate leasing, and intellectual property rights. These workshops will begin prior to launching the Social Equity Program in hopes to equip potential social equity operators with an understanding of their rights under business transactional law and designed to help participants identify and avoid predatory incidents that commonly occur among social equity businesses.

OCM is working with Public Counsel to establish timelines for the workshops and will continue providing status updates in future quarterly reports.

UNLICENSED CANNABIS BUSINESS ENFORCEMENT

County Counsel's Cannabis Team continued its litigation against 12 pending civil nuisance abatement actions. The team also worked with property owners who initiated unlawful detainer actions against illicit dispensary tenants at three separate locations. At two of the locations where the County petitioned for the appointment of a Receiver, repairs are underway, with interior demolition now complete. Finally, during this period, the County confirmed closure of eight locations where illicit dispensaries have been operating.

As previously mentioned in other quarterly reports, OCM is committed to addressing the challenges with enforcement of the unlicensed cannabis market. Since the last report, OCM submitted a budget request aimed at significantly disrupting the unlicensed market in high-concentration areas within unincorporated communities. The budget request includes funds for additional dedicated staffing to handle high caseloads of complex and time-intensive legal actions, search warrant execution, and enforcement coordination. Increasing resources will enable the County to increase capacity to effectively enforce more rapid and targeted civil litigation needed to successfully shut down unlicensed dispensaries and reduce illegal activity.

Emerging Cannabis-Related Enforcement Issues

Beginning in November 2024, OCM met with representatives from Public Health Treasurer and Tax Collector, County Counsel, and Sheriff to discuss growing concerns over local tobacco smoke shops selling unlicensed cannabis and industrial hemp products. The issue has created significant public health and safety risks and resulted in the adoption of intoxicating hemp emergency regulations from the California State Department of Public Health, which went into effect on September 23, 2024. The emergency regulations require that industrial hemp food, food additives, beverages, and dietary supplements intended for human consumption have no detectable amount of total tetrahydrocannabinol (THC), creates a minimum age of 21 to purchase hemp final form food products intended for human consumption, limits the number of servings in hemp products to five per package, and includes additional cannabinoids within the definition of THC.

Discussions with partnering County departments helped to clarify department roles and address potential gaps in regulating hemp products specifically sold at tobacco smoke shops. Public Health has local enforcement authority over food and beverages manufactured using industrial hemp products under the Health and Safety Code sections 113700 (California Retail Food Code) and 109875 (Sherman Act) and will continue addressing potential violations under these codes. OCM, County Counsel, and Sheriff will continue working together regarding unlicensed cannabis products being sold outside of licensed dispensaries, including smoke shops.

Additionally, in December 2024, Public Health sent notification letters, cosigned by DCBA, to licensed food markets and tobacco retailers in the unincorporated areas informing them of emergency regulations on industrial hemp and relevant local ordinances related to the County's current ban on commercial cannabis. The letter also included tips to help businesses ensure they comply with all State and local laws to avoid potential penalties. As a result of coordinated efforts to develop the notification letters, Public Health engaged the City of Los Angeles (City) partners, whereby the City also created a similar notification letter for their jurisdiction.

OCM will continue coordinating with partnering County departments on ongoing compliance with this issue and other emerging issues as they arise.

FUTURE REPORTS

OCM will continue to provide quarterly updates to your Board on the progress of these efforts, with the next report scheduled to be submitted in May 2025.

Should you have any questions concerning these matters, please contact me or Laura Magallanes, Deputy Director of Office of Cannabis Management, at lmagallanes@dcba.lacounty.gov.

RC:LM:FGN
SMB:AS:EV:ph

Attachment

c: Executive Office, Board of Supervisors
Chief Executive Office
County Counsel
District Attorney
Sheriff
Agricultural Commissioner / Weights & Measures
Economic Opportunity
Fire
Planning
Public Health
Public Works
Treasurer and Tax Collector

COMMERCIAL CANNABIS LICENSING PROGRAM PUBLIC COMMENT SUMMARY

I. BACKGROUND

In late 2023, OCM began coordinating workgroup meetings with County departments to establish a framework for zoning, land-use, and other regulatory license requirements. These departments included Planning, Public Works, Agricultural Commissioner / Weights and Measures, County Counsel, Fire, and Public Health. The framework developed during these workgroup meetings would form the foundation of the County's proposed commercial cannabis business license program and amendments to Title 8 and Title 22 of the County Code which will govern how the County will regulate the legal industry in the unincorporated areas and where these businesses would be allowed to operate.

An initial draft of the proposed cannabis zoning amendments was developed in early 2024. This draft was revised by Planning and County Counsel to include both General Plan and Specific Plan zones that would allow cannabis businesses, land-use approval process, distance buffers between cannabis businesses and youth-sensitive areas, and other operating requirements. The revised draft was distributed to relevant County departments for their review and feedback. Following the departmental review, OCM worked closely with the Planning Department to incorporate necessary modifications and prepare a public draft of the Commercial Cannabis Zoning Ordinance.

In July 2024, the draft zoning ordinance and an expansive list of proposed business operating requirements was published to OCM's website. Simultaneously with the publication of the draft zoning ordinance and business operating requirements, OCM initiated a robust community outreach campaign which included a series of in-person and virtual community meetings hosted throughout unincorporated communities, a 45-day public comment period on the proposed zoning ordinance and business operating requirements, and targeted engagement with numerous community organizations.

II. KEY THEMES FROM PUBLIC COMMENTS

Key themes were identified based on the frequency and prominence of stakeholder comments. These themes highlight critical issues that arose repeatedly during the feedback process, reflecting widespread concerns and priorities among community members.

1. Proximity to Youth-Oriented Uses and Other Sensitive Locations

Comments related to the distance between cannabis businesses and Youth-Oriented Uses emerged as the most common theme. This topic was referenced in at least 194 comments or 55 percent of all comments submitted. Stakeholders expressed varying perspectives regarding the proximity of cannabis businesses to a Youth-Oriented Use; but generally, comments discussing this topic advocated for an expansion of buffer distances around Youth-Oriented Uses and other sensitive locations.

Buffers from Youth-Oriented Use

Several comments supported maintaining or expanding the proposed 600-foot buffer around youth-oriented uses and other sensitive areas:

- **Expand Buffers:** At least 80 percent of stakeholders who raised the issue related to proximity of cannabis businesses to sensitive locations expressed concerns that the proposed 600-foot buffer was inadequate, some argued in favor of increasing the buffers to as much as 1,000 feet, particularly if the definition of a youth-oriented use remains narrow. Specific concerns highlighted youth exposure and the lack of a Conditional Use Permit (CUP) to control the placement of cannabis businesses to justify larger buffer zones.
- **Maintain or Reduce Buffers:** A few commenters noted that existing age verification and advertising restrictions provide sufficient protection for youth, suggesting that smaller buffer zones may be adequate.
- **Establish Residential Buffers:** Calls for buffers of up to 1,000 feet between cannabis businesses and residential areas to mitigate impacts on multi-family and single-family dwellings and neighborhoods overall were also common. One comment noted a misalignment with the County's General Plan by not establishing buffers between industrial cannabis operations and residential areas.

Buffers from other cannabis businesses

Several comments raised concerns about the proximity of cannabis businesses to each other and the potential for overconcentration or clustering of these businesses, particularly retail business types, but also industrial operations such as cultivation, manufacturing, and distribution. These concerns were attributed to the significant amount of industrially zoned land in the 2nd and 5th Supervisorial Districts, relative to industrial zoning in other districts.

To address this issue, recommendations included expanding buffers between businesses and limiting each type of cannabis business to one per 10,000 residents in each community.

Additionally, commenters highlighted the need to clarify "first in time, first in right" protections for cannabis businesses. This refers to the rights of cannabis businesses to secure a license for a specific site when competing with a potential youth-oriented use or another licensed cannabis retailer seeking to locate within 600 or 500 feet, respectively.

Buffers from other sensitive locations

Many comments also recommended establishing buffers between cannabis businesses and numerous other uses such as universities, hospitals, alcohol and drug abuse recovery treatment facilities, and more (see **Definition of Youth-Oriented Use**).

2. Definition of Youth-Oriented Use

The second most common issue raised in public comments was related to concerns that the County's current definition of "Youth-Oriented Use" is too narrow and fails to adequately protect areas frequently visited by minors. Most of the approximate 194 comments that cited concerns about inadequate distance buffers also suggested expanding the definition to include additional sites that should be buffered from cannabis businesses to better safeguard public health, safety, and well-being.

Many comments emphasized the need to apply distance buffers to businesses and attractions that primarily draw individuals under the age of 21. Specific examples included arcades, toy stores, ice cream parlors, karate and dance studios, boys and girls clubs, community gardens, tutoring centers, theme parks such as Six Flags Magic Mountain, Chuck E. Cheese, Lego stores, Starbucks, and churches or places of worship which may often host youth programs and activities.

Stakeholders also recommended distance buffers around businesses that may not primarily attract youth but should still be considered a sensitive location due to potential adverse impacts, such as alcoholism and drug abuse recovery or treatment facilities, hospitals, and permanent supportive housing. Finally, as mentioned earlier, several comments supported adding buffers around residential dwellings to minimize impacts on neighborhoods and youth.

3. Concerns on By-Right/Ministerial Approval Process

About 75 or 21 percent of comments included feedback related to zoning and land-use issues outside of distance buffers and sensitive locations that require a buffer. Of these comments, one of the most frequently raised issues particularly among community organizations that submitted comment letters on behalf of their members expressed opposition to the proposed by-right/ministerial land use approval process, raising concerns about the lack of discretion and limited opportunities for public input in approving cannabis businesses. Some were concerned that the streamlined ministerial process could result in inadequate oversight and insufficient safeguards for communities.

Some commenters advocated for requiring a Conditional Use Permits (CUP) instead of ministerial approval. They argued that a CUP would allow for site-specific reviews, public notices, and public hearings—providing stronger safeguards to protect neighborhood character, ensure compatibility, and establish enforceable conditions. Supporters of CUPs emphasized the importance of public input in the business location approval process and suggested creating a mechanism for communities to "opt out" of hosting cannabis businesses.

Others recommended regulating cannabis businesses like liquor stores and bars, which require CUPs. Additionally, one commenter questioned whether the "good neighbor

policy" and "corporate social responsibility" requirements would be as enforceable or effective at ensuring compliance and accountability compared to CUPs.

4. Organized Community Opposition

OCM received a disproportionate number of comments from just four communities in the 2nd and 5th Supervisorial District. Individuals and organizations from communities in Ladera Heights, El Camino Village, Newhall, and Stevenson Ranch made up approximately half of all comments received during the Public Comment Period. Some community groups created templates to outline their concerns, which were widely circulated within their networks and submitted by multiple individuals, resulting in a significant number of identical comments. Many of the concerns expressed by these communities are reflected in the key themes of this report, while others are unique and summarized below.

Ladera Heights

Many community members submitted comments in support of recommendations submitted by the Ladera Heights Civic Association. While generally opposed to retail cannabis storefronts commenters were open to allowing only non-storefront options like delivery services. Other recommendations include increasing buffers to 1,000 feet from youth-oriented and sensitive uses; expanding the definition of Youth-Oriented Use; requiring cannabis applicants to engage with civic associations, community groups, and residents or businesses within 1,000 feet of retail establishments to ensure meaningful stakeholder input; and broadening the definition of "owner" to enhance oversight and transparency. Additionally, residents recommended significant fines for special events involving cannabis in violation of the County Code.

El Camino Village

El Camino Village residents strongly opposed cannabis businesses citing risks to public safety, enforcement challenges, and harm to the community's family-oriented character. Concerns include increased crime, proximity to schools, a daycare, a park, and a drug rehabilitation facility, as well as potential youth exposure to cannabis and secondhand smoke. Residents also worry about impaired driving, increased traffic, and the County's limited enforcement capacity, citing past failures to address illegal food vending. Additionally, a Torrance Councilman commented that Torrance, is considering annexing the El Camino Village area and opposed any cannabis businesses in El Camino Village to align with Torrance's existing cannabis prohibition if annexation occurs.

Newhall Church of the Nazarene

A vast number of members of the Newhall Church of the Nazarene and neighboring Santa Clarita opposed allowing cannabis-related activities near the church, citing its role as a youth-oriented use under the proposed ordinance. In total, over 100 comments were attributable to individuals affiliated with this church. Commenters emphasized the church's unique role which serves as the home gym, public park, and recreational facility

for Trinity Classical Academy, a TK-12 private school which lacks an on-campus gym. Stakeholders argue that the 600-foot buffer for cannabis businesses is inadequate, and they advocate for extending the buffer to at least 1,000 feet to better protect youth. They also emphasized that all spaces functioning as educational or recreational facilities should be treated similarly to schools and parks.

Stevenson Ranch

Stevenson Ranch residents strongly oppose allowing cannabis businesses in their community, citing its family-oriented nature, proximity and concentration of schools, and attractions geared toward children, such as Chuck E. Cheese, Six Flags Magic Mountain, and other businesses that residents argue attract many youths in the area. The Stevenson Ranch Community Association also referenced research and studies connecting cannabis stores to increases in property crime, armed robberies due to cash handling, higher rates of violent crime, and impaired driving and traffic incidents. They advocate for a minimum 1,000-foot buffer between cannabis retail locations and residential homes, schools, childcare facilities, parks, and businesses that cater to children. Numerous comments expressed their readiness to take legal action to protect their community.

5. Youth Impact

Another major theme in many comments was the impact of cannabis businesses on youth and the need to prioritize youth protections. Community members and organizations expressed strong concerns about how these businesses would affect young people in their communities. Concerns about impact on youth often supported recommendations like expanding buffers around sensitive locations and broadening the definition of Youth-Oriented Use. Other issues include:

Accessibility and Youth Consumption

Concerns were raised that the presence of cannabis businesses could normalize cannabis use leading to a decline in its perceived harms. Some believed increased accessibility would lead to increased use and minors would be able to access cannabis products with fake IDs. Some recommended strict age verification procedures to counter the use of fake IDs.

Advertising and Visibility

Concerns were also raised about the visibility of cannabis businesses through signage and advertising near spaces frequented by youth. Stakeholders recommended imposing strict advertising regulations, like those for tobacco and alcohol, to limit youth exposure and mitigate potential influences.

Family-Friendly Community

Protecting the character and values of communities was another common theme. Many commenters emphasized that locating cannabis businesses near their communities that are traditionally safe, and family friendly does not align with their community values.

6. Public Health & Safety

The public health and safety implications of cannabis businesses were also a prominent theme in stakeholder feedback. Concerns were centered around negative health impacts of cannabis and public safety risks like increased crime that could result from nearby cannabis businesses.

Public safety risks, including crime and impaired driving, were also mentioned, along with calls for stronger enforcement and equitable resource allocation.

Public Health

Stakeholders expressed concerns about the health impacts of high-potency cannabis products. They urged the County to integrate research, monitoring, and data collection into the licensing process to better understand and mitigate public health risks. This approach could support evidence-based policymaking and promote safer communities.

Calls were made for stronger harm reduction measures, including requiring the posting of harm reduction information at cannabis businesses. Stakeholders highlighted concerns about secondhand smoke exposure, particularly in multi-unit housing where smoking bans are poorly enforced. They emphasized the need for laws protecting residents from secondhand smoke inhalation and other adverse health impacts.

Enforcement and Public Safety

Numerous stakeholders raised concerns related to gaps in law and code enforcement and advocated for increased investment to address safety risks associated with cannabis businesses. Some expressed skepticism that cannabis-related violations will be meaningfully addressed.

- **Law Enforcement Resources:** The Westridge Community and other groups called for dedicated funding for local law enforcement to manage increased demands tied to cannabis operations. Concerns included understaffing, disbanded drug prevention teams, and slow emergency response times in areas like Stevenson Ranch, Westridge, and Newhall Ranch.

- **Crime and Safety Risks:** Several commenters referenced studies linking cannabis dispensaries to higher property and violent crime rates. Comments highlighted the cash-based operations of cannabis retailers as a significant public safety risk which could increase robberies. Commenters emphasized limited law enforcement resources and long response times, making some unincorporated areas more vulnerable to criminal activity.

- **Lack of Enforcement:** Stakeholders argued that communities like Acton are already burdened by an overconcentration of industrial uses, which they claim are poorly regulated by County authorities despite frequent violations of development standards.

7. General Zoning and Land-Use

Zoning and land use considerations for cannabis businesses were also significant focus of stakeholder feedback. While many comments addressed broader topics like buffers from sensitive uses or permissible zones for cannabis businesses—covered in other sections of this report—this section highlights more nuanced zoning and land use issues such as concerns about the equitable distribution of industrial operations, specific plan exemptions, and aligning with existing plans and policies.

Distribution of Industrial Cannabis Business Types

Stakeholders in Acton argued that the proposed ordinance will lead to an inequitable distribution of industrial cannabis operations in a limited number of predominantly disadvantaged communities in Supervisorial Districts 2 and 5. While the ordinance limits the number of retail and delivery businesses per district, it places no cap on industrial cannabis operations, which could lead to an overconcentration in certain districts and communities. Stakeholders attribute this concern to the extensive amount of industrially zoned land in Acton, a small rural community, compared to other large swaths of unincorporated areas in Supervisorial District 3.

Specific Plans and Community Standards District Exemptions

Several commenters requested that certain communities be exempt from allowing storefront cannabis businesses, citing existing prohibitions on smoke shops and similar establishments in other Specific Plan areas. For instance, the Ladera Heights Community Association advocated for limiting cannabis operations to delivery-only businesses in alignment with proposed restrictions in the West Carson Specific Plan.[1] Concerns were also raised about potential disruptions to approved Specific Plans, such as a housing development in the Newhall Ranch Specific Plan, which has already undergone extensive environmental review and withstood legal challenges. A housing developer in the Newhall area argued that the housing development serves as a foundation for long-term housing and economic growth and cannabis businesses could disrupt the intended community character and development goals.

General Plan Compliance

Two comments assert that the draft cannabis zoning ordinance is inconsistent with the County General Plan because it fails to include buffers to protect residential areas from industrial cannabis operations, such as cultivation, manufacturing, and distribution.

[1] Specific Plans that currently prohibit businesses such as tobacco shops, vape shops, cigar bars, or hookah lounges will also prohibit cannabis storefront retail businesses under the proposed zoning amendments. These Specific Plans include East LA 3rd Street, West Carson, and Connect Southwest.

Specifically, they refer to N 1.11[2] of the Noise Element and ED 2.2[3] of the Economic Development Element of the General Plan.

To address these issues, the commenters recommend revising the ordinance to establish a 600-foot buffer between residential properties and all industrial cannabis operations. They also recommend additional development standards like requiring industrial cannabis facilities to be enclosed by a wall and attractively screened.

Misalignment with the South Bay Area Plan and Westside Area Plan

Concerns were raised about potential conflicts between the draft cannabis zoning ordinance and regional plans, such as the South Bay Area Plan and Westside Area Plan, which are currently being amended by the Planning Department. Stakeholders noted that some commercial zones are being rezoned to mixed-use, and because cannabis businesses could be permitted in commercial-only mixed-use zones, this may create a conflict by designating areas planned for housing development as eligible for cannabis retail businesses. This conflict could undermine efforts to meet regional housing goals.

III. OTHER THEMES

Stakeholders also provided feedback on a variety of other topics that, while less frequently raised, remain significant considerations for shaping the County's cannabis policy. While some of these topics were not intended to be commented on during the public comment period such as the Social Equity program and tax revenue these comments were still included as part of this summary as integral components of the cannabis licensing program.

These other themes include:

1. **Social Equity Program:**
    - One comment recommended Social Equity eligibility criteria should be published and undergo public review before going into effect.
    - A large cannabis operator with over 40 operations across California, suggested that social equity licenses be merit-based, as the complexity of the industry warrants prioritizing the most qualified and experienced applicants.
    - A recommendation was made to create a rehabilitation pathway for individuals with prohibited convictions, particularly for minor, nonviolent offenses such as perjury.

[2] Policy N 1.11: Maximize buffer distances and design and orient sensitive receptor structures (hospitals, residential, etc.) to prevent noise and vibration transfer from commercial/light industrial uses.
[3] Policy ED 2.2: Utilize adequate buffering and other land use practices to facilitate the compatibility between industrial and non-industrial uses.

2. **Economic Impacts:**

    - Allocate a portion of cannabis tax revenue to support youth and community programs in areas affected by cannabis access.
    - Consider allocating 20 percent of cannabis tax revenue to a local social equity fund. This would reduce reliance on state grants and provide sustainable funding for equity programs.
    - One comment supported the Community Reinvestment[4] Plan and advocates for allocating a portion of the projected cannabis tax revenue to a fund benefiting unincorporated communities hosting cannabis businesses.
    - Concerns were raised that uncontrolled cannabis business growth could deter investment and reduce economic diversity in disadvantaged areas. Others also worried that allowing cannabis businesses would reduce property values in their community.
    - Suspend all County-imposed taxes on cannabis or cannabis products sold to patients with a valid doctor's recommendation.
    - Several comments cited concerns about adverse impacts to property valuations that could arise by locating cannabis businesses nearby.

3. **Environmental Impacts:**

    - One comment recommended that businesses should commit to cleaning surrounding areas to address waste from disposable plastics and pollutants.
    - Traffic concerns and increased congestion in already heavily trafficked areas resulting from these new businesses.
    - Others expressed concerns regarding waste management that could result from improper disposal of cannabis waste and the worsening of illegal dumping issues in the Antelope Valley. A commenter proposed a regulation requiring operators to use licensed third parties to render cannabis waste unusable and unrecognizable.

4. **Corporate Social Responsibility:**

    - One comment expressed a lack of clarity with the "Labor/Employee Relations" category for Corporate Social Responsibility (CSR) commitments, calling for a list of options for each CSR category so that applicants understand the requirements before committing to a CSR.

[4] 2024-08-19 Final Report on Developing a Community Reinvestment Spending Plan w Cannabis Tax

- Allow the establishment of a compassion program for medical cannabis patients to qualify as a CSR and satisfy this requirement.

5. Employment Requirements:

- A comment noted the that the County's criteria for "transitional worker" differs from the State's definition and recommended the County revise this definition to align with the State.
- The definition of a "local worker" based on proximity of a primary residence to a cannabis business and zip codes with higher poverty or unemployment rates is unclear and may lead to inconsistent interpretations. The County should provide clear guidance on qualifying zip codes and distance requirements from a cannabis business to qualify as a local worker.
- The County should require that all employees of cannabis businesses be at least 21 years old, with age documentation verified at the time of employment.
- Broaden the definition of Local and Targeted workers to include medical cannabis patients to ensure cannabis businesses have employees with direct experience to guide other patients.
- Establish incentives for "High Road Employers" by offering tax credits to cannabis businesses who go above basic employer requirements.

6. Good Neighbor Policy:

- Notify stakeholders including businesses, residents, and civic groups early in the application process to allow additional time for feedback, discussion, and ample time to address concerns.
- Expand the required community meeting notice period to 30 days to allow businesses and residents more time to ask questions, voice concerns, and have more meaningful discussions while allowing applicants more time to adjust, if needed, based on community feedback.
- Notify businesses and residents within a 1,000-foot radius to ensure that those most likely to be directly impacted by a dispensary are informed.
- Establish a registration system to allow community and civic associations to register with OCM and receive notices about proposed dispensaries in or near the areas they serve. Engaging these organizations can support outreach by leveraging established community structures to enhance communication and engagement.

7. Miscellaneous:

- The “administrative ordinance” must be made available for public review to ensure comprehensive community input.
- The proposed operating hours are too restrictive compared to what is allowed for alcohol sales.
- Expand the definition of ownership to include indirect owners, affiliated entities, governance influencers, and individuals with branding or licensing ties who exert financial or operational control.
- Include cannabis consumption lounges in the licensing framework to provide safe, clean spaces for individuals unable to medicate at home due to housing restrictions or personal circumstances.