



## County of Santa Cruz Board of Supervisors

### Agenda Item Submittal

**From:** County Administrative Office

**Subject:** Chapter 13.10 amendments to allow temporary produce sales areas and produce stands within the Timber Production and Special Use Zone district and inclusion of Chapter 7.138 cannabis farm retail license

**Meeting Date:** March 11, 2025

#### Formal Title:

Consider approving in concept an "Ordinance Enacting Chapter 7.138 of the Santa Cruz County Code Regarding Cannabis Farm Retail License Pilot Program," an "Ordinance Amending Section 13.10.640 of the Santa Cruz County Code Regarding Temporary Produce Sales Areas and Produce Stands," and an "Ordinance Amending Section 13.10.372 of the Santa Cruz County Code Regarding Allowance of Temporary Produce Sales Areas and Produce Stands in the Timber Production Zone District" allowing for retail cannabis sales at produce stands, approve the California Environmental Quality Act Addendum to the Final Environmental Impact Report for the Sustainability Policy and Regulatory Update, and take related actions

#### Recommended Actions

1. Approval in concept "Ordinance Enacting Chapter 7.138 of the Santa Cruz County Code Regarding Cannabis Farm Retail License Pilot Program," "Ordinance Amending Section 13.10.640 of the Santa Cruz County Code Regarding Temporary Produce Sales Areas and Produce Stands," and "Ordinance Amending Section 13.10.372 of the Santa Cruz County Code Regarding Allowance of Temporary Produce Sales Areas and Produce Stands in the Timber Production Zone District" allowing for retail cannabis sales at produce stands, and schedule the ordinance for second reading and final adoption on March 25, 2025;
2. Approve the Addendum to the Final Environmental Impact Report for the Sustainability Policy and Regulatory Update;
3. Direct the Clerk of the Board to publish the Notice of Proposed Ordinance Summary in a newspaper of general circulation at least five days prior to the scheduled second reading and final adoption, no later than March 20, 2025, pursuant to Government Code Section 25124; and
4. Upon final adoption, direct the Community Development and Infrastructure Department to submit the amendments to the local coastal plan implementing ordinances to the California Coastal Commission for approval and certification.

#### Executive Summary

The Cannabis Licensing Office (CLO) has provided proposed amendment to SCCC Chapter 13.10.640 and 13.10.372 based on the Board motions on June 4 and October 29, 2024, to allow for cannabis sales following the Sustainability Plan update which allowed for produce stands and markets. The CLO has also provided a new SCCC chapter for Board consideration which would create a business license for this type of

activity via a three-year pilot program. The trio of code changes would allow for retail sales and cannabis consumption at licensed farms in the Commercial Agricultural (CA), Agricultural (A) Special Use (SU) and Timber Production (TP) zone district, based on the discretion of the Cannabis Licensing Official followed by a public notification and appeal process, similar to the Planning Divisions current practices.

## **Discussion**

On November 14, 2023, the Board considered cannabis cultivation issues related to sustainable growth, economic development, and responsible cannabis regulation, in alignment with the 2023 Sustainability Plan updates. The Board discussed the matter and directed the CLO to conduct public meetings across various districts to collect public opinion. The motion from that meeting outlined specific discussion topics to be covered:

- Changes to canopy limits.
- Increases to cannabis cultivation area and greenhouses.
- Limited retail sale of cannabis goods grown and produced by cultivation licensees at the point of cultivation.
- Medicinal, educational and recreational options for on-site consumption.
- An onsite consumption pilot program.
- Changes to co-location options for non-retail commercial cannabis.

The Board instructed the CLO to facilitate community discussions on potential options to gain a deeper understanding of public concerns before considering any changes to the existing cannabis ordinance.

The CLO collaborated with Board members to identify key individuals and groups for targeted outreach to encourage attendance at the public meetings. Board members supported these efforts by including information about the meetings in their newsletters. The CLO promoted the meetings on their website and coordinated with the Public Information Officer to share updates across social media platforms, including NextDoor, X (formerly Twitter), and Facebook. A press release was also issued. The NextDoor post received 14,000 impressions, while the Facebook post garnered 1,100 impressions prior to the meetings.

Community meetings were conducted in districts one, two, four, and five. District three, which currently has no commercial cannabis businesses under County jurisdiction, did not host a meeting. The meetings were held in the evening and via a hybrid format, allowing community members to participate either in person or via Zoom.

The CLO presented a report of the results of the listening sessions to the Board on June 4, 2024. Community members expressed several concerns regarding this issue, including the lack of standards or testing for law enforcement to address impaired driving, the need to notify adjacent parcel owners, the current state of the county's road infrastructure, and security issues related to operating a primarily cash businesses, which could potentially attract crime. Concerns were also raised about allowing such businesses in any zoning district accessed by private roads, although currently, no non-retail commercial cannabis businesses are located on private roads. The lack of detailed information on this topic was a recurring concern at all meetings, as was a desire to understand the motivations behind these proposals. Community members also questioned whether there is a market for these types of businesses, noting that there are 12 cannabis tourism companies in California and that cannabis tourism in the United

States was estimated to be worth \$17.1 billion annually in 2021, with \$4.5 billion from direct sales and \$12.6 billion from ancillary spending. Additionally, some community members opposed any on-site consumption or retail sales at cultivation sites.

Another nuanced concern raised was the compatibility of right-to-farm practices and pesticide use on nearby agricultural parcels. It was suggested that repurposing agricultural land for retail purposes might not align with county policies. It was emphasized that the County should assess whether such usage is consistent with the surrounding land use.

Industry representatives, particularly those from the cultivation sector, generally supported this concept. They highlighted the potential community benefits of the educational component that could be included. Comparisons to the wine industry were frequently drawn to illustrate their points.

Suggestions for consideration on this topic included various operational limits, such as restricting business hours, capping the quantity of product sold, and limiting sales to products grown or produced from the material grown on-site (e.g., concentrates made from cannabis cultivated there). It was also suggested that special events like weddings should be prohibited, and that the sale of third-party cannabis products should not be allowed.

It was emphasized that evaluating the suitability of the parcel for such activities and the potential impacts on the neighborhood is necessary, especially in areas like Crest Drive where residential properties are situated directly next to CA zoned farms. Certain areas may be inappropriate for on-site consumption or sales due to their close proximity to residential properties.

The proposal for a wellness center received notable support from the public. This center would emphasize the medical aspects of the industry and offer shuttle transportation, and educational garden tours. Additionally, it would explore partnerships with local hotels.

The Crest Drive neighborhood in district two was actively engaged in all four listening sessions and continued to communicate their views through emails after the meetings. Generally, they opposed most proposals, emphasizing the need for additional data and clearer implementation details. Attendance from this group varied from three to five people at each meeting. They also sent six emails on the subject, prior to the June 4, 2024, listening session Board meeting. However, some members of this group supported the idea of onsite sales and consumption at farms, particularly under the framework of a wellness center that provided transportation to and from local hotels.

There appeared to be organized support within the broader community, as evidenced by written correspondence consisting of 13 emails sent prior to the June 4, 2024, listening session Board meeting. Most of this correspondence supported retail sales at farms.

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<sup>1</sup> Yakowicz, Will and Rowan Kelleher, Suzanne (2022, May 29) Cannabis Tourism Is Now a \$17 Billion Industry-And It's Just Taking Off, *Forbes*  
<https://www.forbes.com/sites/willyakowicz/2022/05/29/cannabis-tourism-is-now-a-17-billion-industry-and-its-just-taking-off/?sh=6bb4f1052056>

The report prompted a discussion that resulted in the Board directing the CLO to draft ordinances related to the items on the November 14, 2023, agenda item. These specifically included the following:

- a) Align the canopy limits across zone districts and license classes with their current co-location maximums.
- b) Remove the co-location option outlined under the non-retail commercial cannabis uses section of SCCC 13.10.650.
- c) Allow cultivators in good standing who have not been the subject of complaints to apply for an additional 2% canopy bonus of the parcel size every year.
- d) Allow CA-zoned parcels, less than 10 acres, to use the entire square footage of established greenhouses for cannabis production.
- e) Allow limited retail sales and consumption of cannabis goods grown by the licensee at the point of cultivation, similar to a winery.
- f) Allow current retail operators the option to have onsite consumption lounges.

Staff was further instructed to bring back the cultivation related items no later than the end of October and the items related to on-site consumption for retailers and cultivators no later than the end of 2024, including background information as it relates to economic impact analysis. This report is limited to retail sales and consumption at existing farms (item e). The Board previously reviewed the draft ordinance language during the October 29, 2024 meeting.

The Board directed staff to limit sales to an eighth of an ounce of cannabis flower per person per day. The Board discussed concentrates and extracts but did not include limits in the direction based on the limited manufacturing capabilities of cultivators in the County. Based on the Board discussion, staff included limiting manufactured products sales to be food grade (tinctures) and topical products. This addition would prohibit inhalable concentrates from being sold and consumed at farm stands.

### **Analysis of Proposed Amendments**

The Board has indicated the desire to support our local cannabis industry while also balancing the needs of neighbors and maintaining appropriate regulation of the industry. To that end, the proposed trio of code amendments, which would allow existing cannabis farms the option of pursuing retail sales and on-site consumption at their farms, are intended to be a part of a three-year pilot program. The pilot program is suggested as a means to allow for responsible operational changes while also aiding County staff in gathering information and feedback from the operators, neighbors and the general public on these operations.

The proposed pilot program will require the Cannabis Licensing Official to review applications, make findings to determine if a site should be eligible for a business license, and make a CEQA determination about the site. The Official may conditionally approve an application which would trigger a public notification process, which mimics our Planning Department procedures, and would allow any member of the general public to appeal such determination. Appeals will be heard by an administrative hearing officer who shall render a final decision on the application.

Code amendments are suggested for two current code provisions and a new code section is added as follows:

1. The proposed amendments for SCCC Chapter 13.10.640 will allow for retail sales at existing farms via the produce stand allocation already within code. Currently produce stands are already allowed in the CA and A zones. The amendments allow for these activities to occur within the TP and SU zone district. The amendments also allow for the reuse of existing permitted commercial buildings to be used for produce stands. Key aspects of the existing regulations that will be applied to cannabis businesses include maintaining seasonal operations during production seasons only and limiting sales to what is grown or produced by the farm proprietor only.
2. The proposed amendment to SCCC Chapter 13.10.372 is limited to a cross-reference in the use charts for the TP zone district, which expressly allows the restrictions associated with produce sales areas and produce stands in Chapter 13.10.640 to apply.
3. Proposed SCCC Chapter 7.138 has been created to mimic our cannabis business licensing chapters. This chapter would only be applicable to cannabis farms which pursue a retail license. This chapter has been drafted as a pilot program for three years, allowing for two seasons of operations. We anticipate processing times associated with building permits and State licensure to prevent these sites from being operational for the first year of the pilot program. The license approval process mentioned above, including the public notification, and an appeal process are included in Chapter 7.138.

To address community input from the listening sessions we have included various requirements for all potential cannabis retail farms including:

- Clear grounds for license revocation including but not limited to;
  - Limited operational hours;
  - Violation of County signage requirements;
  - Noise violations;
  - Violation of State law;
- Official discretion based on various factors:
  - Distance to competing land uses;
  - Access from public roads;
  - Parking capacity;
  - View sheds;
  - Security plans;
- Prohibition on placement or use of a roadside billboard to advertise;
- Prohibition on packaging materials that contain cartoons or caricatures that may be appealing to minors, as determined by the Health Officer;
- Requirements that business must comply with California Labor Code Section 6404.5 (California smoke-free workplace requirements); and
- Prohibition of retail farms on private roads unless the applicant obtains approval from all landowners.

Additionally, licensees must record the number of visitors and vehicles which arrive on-site daily. This is a critical aspect of the pilot program that will provide the Board information if it considers allowing permanent code amendments in the future.

## **Research Findings**

Staff spoke to a number of counties regarding agri-business style cannabis tours and on-site sales and consumption. Below is the result of that research.

There is currently one cannabis retail farm which allows for onsite sales permitted within the state. This site is located in Nevada County. The site allows visitors to see the farm operations from the retail area, but they are restricted from having physically touring the plant area.

A different business model is for the cannabis farms to have agricultural tours combined with sales through local cannabis retailers. This model occurs throughout the state and requires that farms have business relationships with third party tour companies and local retailers. This model developed because tourists want to see the cannabis plants at the farm and want the ability to purchase and consume the cannabis products that originated from the farm(s) they toured.

During discussions with tour operators, they all emphasized that the cannabis plants are the star of the tours. Visitors want to see and touch the cannabis and enjoy taking pictures in the fields. They also want to learn how the cannabis they are viewing is unique. Because visitors also want to sample the cannabis products they have seen on the tours, the tour companies take people to retailers which sell the cannabis from the farm toured. The last aspect that all the tour operators all mentioned is people need a place to safely consume their recently purchased cannabis as part of the tour experience. They cited the lack of consumption lounges and designated safe areas for consumption as a challenge for both tour operators and participants, with participants tending to seek out public places in nature, like beaches, or a hike in a public park for consumption areas.

One tour operator stated the best-case scenario for their company, their clients, and the cannabis farms is to allow for tours, retail sales and consumption at the farm. This would allow the tour companies to provide more time for secondary activities such as coffee shops, restaurants, wineries, and breweries, which creates more opportunities for non-cannabis spending.

Many of the cannabis tour companies have interactive tours with multiple destinations and activities that benefit the local economy. The table below displays a snapshot of various tour options in Northern California and along the Central Coast.

<b>Locality</b>	<b>Activities</b>	<b>Duration</b>	<b>Price Per Person</b>
Oakland	Dispensary and winery tour plus tasting	4 Hours	\$119
San Francisco	City tour plus stops at 3 consumption lounges	3 Hours	\$995
San Luis Obispo	Coffee roaster tour, visit 2 dispensaries, hike to see monarch butterflies	4 Hours	\$99

Grover Beach	Coffee roaster tour, visit 2 dispensaries, 1 hour of yoga on the beach	3 Hours	\$150
San Luis Obispo	Private Tour options with various farms	Unknown	Unknown
Humboldt County	4 day / 3 night all inclusive, 1 farm tour, 1 manufacturer tour, redwood hike, yoga, winery tour plus tasting	4 Days	\$3,000
Mendocino County	Half day farm tour	4 hours	\$250
Mendocino County	Picnic lunch, farm tour, dispensary visit, redwood hikes, winery tour	2 Days	\$1950
Ukiah	Lunch, farm tour, hash making tour, dispensary, restaurant	4 hours	\$1040
San Francisco	Lunch, farm tour, dispensary visit, restaurant	8-10 hours	\$1040
San Francisco	City lounge tour	3-4 hours	\$995
Humboldt County	Farm tour and discount on farm products at local dispensary - 3 versions featuring different farms	4 hours	\$150
Humboldt County	Visit two farms and discounts on their products at local dispensary	8 hours	\$225
Humboldt County	Cannabis farm tour, picnic lunch, winery tour plus tasting	6 hours	\$245
Sonoma	High tea, cannabis infused food and beverages	2 hours	\$99
Sonoma	Cannabis farm tour, lunch and local wine plus various additions available	2 Hours	\$150
Sonoma	Indoor grow tour, dispensary tour, winery or brewery tour plus various additions available	5 hours	\$599 - 4 people
Napa / Santa Rosa	Sunset cannabis farm and winery tour, catered dinner, wine tasting	4 hours	\$159

**Health Services Agency Analysis**

Health Services Agency Public Health Division (Public Health) has shared concerns about the expansion of the availability of cannabis at farm stands / farm consumption locations. These concerns include the need to raise awareness around potency of modern cannabis products; the potential for mental health conditions with prolonged cannabis use and use of high potency products; youth access to cannabis and the normalization of cannabis use on youth populations; impaired driving after cannabis use at a consumption location; second-hand smoke at consumption locations and the need for server training and oversight at consumption lounge locations. Additional details can be found in the attached Health Impact Assessment.

On today's agenda Public Health has a separate letter speaking specifically to the concerns around underage cannabis use. Public Health notes that additional requirements should be considered in the licensing process for retail consumption lounges and at farm locations in order to safeguard public health. Some of these the Board has already discussed and suggested that the Cannabis Licensing Office (CLO) include in Licensing requirements for these new business models. Public Health suggested requirements include: 1) prominent signage at farm stand locations as recommended by the County Health Officer and approved and verified by the CLO regarding the potential impacts of cannabis consumption and exposure to second-hand smoke; 2) limiting the amount of cannabis available for purchase at retail farm stands and for purchase to use in consumption lounges; 3) requesting businesses implement a designated driver or rideshare protocol at consumption locations; and 4) determining a complaint process for licensed locations that includes an annual review by the Cannabis Licensing Office during the license renewal process.

Adopting lessons learned from responsible alcohol retailers and on-site alcohol consumption licensees to reduce risk, Public Health recommends future consideration of a licensing requirement for evidence-informed responsible server training program, which could be verified during regular Cannabis Licensing Office inspections. However, no such standardized training exists locally or statewide. In lieu of this, the Cannabis Licensing Office will continue to work collaboratively with Public Health to identify alternative strategies which support safe consumption and workplace safety, and update licensing requirements as determined by recent advances in science and/or other developments occur in order to maintain positive public health standards related to cannabis in our community.

### **Economic Analysis**

The available data to conduct a thorough economic analysis was limited. Many of the farms operating tours only have data on the money they make from the third-party tour companies, which ranges from \$100 - \$200 minimum per tour. The fees are based on the duration of the tour and the farms typically charged \$100- \$200 per hour to tour the facility.

The retail operators who partnered with the touring companies cited tourist spending from third party tours above \$200 per person, on average, which may reflect people buying up to the recreational limit during these tour stops. Operators also noted that tour guests usually buy more non-cannabis merchandise, specifically branded clothing.

During the listening sessions concern was raised by some retailers on farm sales competing with local retail outlets. Since there is only one farm that allows direct retail sales, there is insufficient data to address this concern. However, based on conversations and anecdotal data, a shift in local consumers from established retail

outlets to direct farm sales is unlikely for reasons of convenience, variety of choice and/or specific promotional opportunities available at regular retail sales outlets. The seasonal nature of retail farm sales, limited hours of operation, minimal product selection, tying farm sales to facility tours and the ability to restrict the number of visitors and/or number of tours, would likely hinder a shift in local consumer behavior from retail outlets to purchasing at a farm location. In addition, farm sales would effectively be restricted to flower only, while retailers have the ability to carry manufactured products derived from the cannabis grown on our local farms. Both farmers and retailers have told us they are currently working to create better local relationships based on the potential to have consumption at our existing retailers. The potential to have retail sales and consumption at the farms could improve these relationships and lead to more local products at our retailers.

During the October 29, 2024 Board meeting three retailers expressed economic concerns related to sales occurring at farms. Those concerns led the Board to directing staff to limit sales at farms to one eighth of an ounce of flower per person per day.

In discussions with our current farm licensees, different approaches to farm sales were noted. Many of the farms we spoke with will only conduct one tour a day. Other farms see the possibility of following a winery model where they are open three to four days a week for a few hours to allow for sales and consumption at the farm, but not necessarily tours where people get to walk through the plants.

From our interviews with tour operators, farms, and retailers and given that tourism is a major economic driver within our county, we speculate that there could be a small marginal increase to our CBT revenues with the advent of retail sales at cannabis farms. Many of our farms are interested in the possibility but not all are appropriate for these types of operations. A majority of our cannabis farms are outdoor cultivations and only have one to two harvest a year so they may not have cannabis to sell until July which would limit their operational window to July through October. The number and type of farms included in the pilot program will also impact the economics for the County cannabis business tax. Based on our discussions with tour operators, the minimum viable amount of retail farms is three in their experience, but to have a vibrant cannabis tourism market five to seven businesses would be better, allowing for a variety of locations for tours, a broader product selection and the opportunity for varied operational times. However, increasing cannabis business tax revenues through direct sales in the limited marketplace of farm sales, would likely be minimal based on the above limitations.

Our current Cannabis Business Tax (CBT) rate is 7% of gross receipts. CBT at the retail level has been somewhat consistent, with sales typically highest from June through November. Tax data is a lagging indicator, with June data indicating May sales. The average annual retail CBT is \$2,330,199 and the median is \$2,381,320 for the past ten years. Below are two data sets showing total retail CBT collected annually since the inception of the retail ordinance and sales by quarter for the same period.

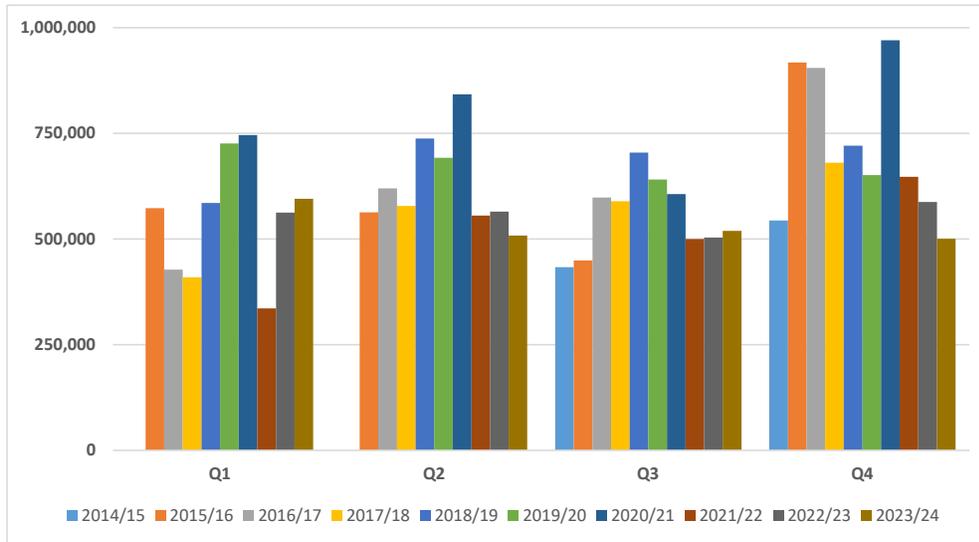
**Table 1: Annual Fiscal Year Retail Cannabis Business Tax**

Taxes	TOTAL	Year to Year		Notes
		Change		
2014/15	<b>978,009</b>			Collection of retail taxes begins in January 2015
2015/16	<b>2,504,043</b>	156.0%		



2016/17	<b>2,551,209</b>	1.9%	
2017/18	<b>2,258,597</b>	-11.5%	
2018/19	<b>2,749,569</b>	21.7%	
2019/20	<b>2,710,709</b>	-1.4%	COVID lockdown starts March 2020
2020/21	<b>3,166,457</b>	16.8%	COVID return to "normal" June 2021
2021/22	<b>2,039,916</b>	-35.6%	
2022/23	<b>2,218,828</b>	8.8%	
2023/24	<b>2,124,650</b>	-4.2%	
2024/25	<b>561,170</b>	-73.6%	

**Table 2: Quarterly Fiscal Year Retail Cannabis Business Tax**



While an increase to the CBT is hard to predict based on information received during our interviews and on-line research, we can provide you with some different scenarios that relate changes in gross sales to changes in CBT.

The FY 2023-24 CBT was \$2,124,650, which represents 7% of gross receipts on \$30,352,143 worth of sales. Each 1% increase to gross sales generates an additional \$21,247 in CBT based on this data set. Below is a table that shows how an increase to gross sales (in percentages and dollars) creates an increase in taxes, using the above data set as a starting point.

**Table 3: Increase in Gross Sales to Increase in Taxes**

Starting Point Gross Sales	% Increase to Gross Sales	Total Gross Sales With % Increase	Increase to Taxes	Total CBT Collected
30,352,143	1	30,655,664	21,247	2,145,897
	2	30,959,186	42,493	2,167,143
	5	31,869,750	106,233	2,230,883
	7	32,476,793	148,726	2,273,376
	10	33,387,357	212,465	2,337,115
	15	34,904,964	318,698	2,443,348
	20	36,422,572	424,930	2,549,580
	25	37,940,179	531,163	2,655,813

Based on this information as an example, retail farms would need to generate an additional \$1,517,607 (5%) in gross sales in order for the county to receive an additional \$106,233 in CBT.

### **Other Economic Benefits**

Discussions with current tour operators noted that retail sales at farms could also be a tourism driver with ripple effects for hotels, restaurants, coffee shops, wineries, and breweries at a minimum.

According to Forbes the cannabis tourism market was valued at \$17.1 billion dollars in 2021, with \$4.5 billion in direct cannabis sales. Tourist “pour an additional \$12.6 billion into restaurants, hotels, attractions and other shops-as well as into state and municipality tax coffers. That’s because for every dollar spent at a cannabis retailer, there’s a multiplier effect, with an additional \$2.80 injected into the local economy, says Beau Whitney, founder and chief economist at [Whitney Economics](https://whitneyeconomics.com/) <https://whitneyeconomics.com/>.”

Findings from the Northstar Travel Group, show that travel and tourism related to cannabis has expanded to a \$57.18 billion global industry in 2023 and they are forecasting a \$444 billion industry by 2030. Innovation paired with access in the cannabis consumption space was listed as a major driver for the growth. The article highlighted cannabis consumption hybrid business where lounges are paired with high end restaurants, integrated spa experiences, and how in mature markets (like our state) these are turning into a “high-touch curated experience – which is what tourism and travel is all about – the experience economy.”

According to a Harris poll, 22% of Americans report they have chosen a destination based on recreational cannabis status. Thirty percent of Americans over 21 (50% of millennials) said they consider legal recreational cannabis status as important when choosing a destination for vacation.

Thus, retail farm tours and sales could propel more ancillary spending, with the potential to increase sales and transient occupancy taxes rather than the cannabis business tax. This will lead to broader financial benefits to the County if the proposed changes are pursued.

One positive example of cannabis tourism and the larger economic benefits can be seen in the City of Modesto, which has embraced cannabis tourism. They developed the [MoTown CannaPass](https://visitmodesto.com/cannapass/) <https://visitmodesto.com/cannapass/>, which is an app-based reward program that helps visitors find local cannabis retailers, presents offers

from other local businesses and shares details on local restaurants and activities in town. The app includes tips on pairing cannabis with food, art and nature. Todd Aaronson, the CEO of Visit Modesto, said the MoTown CannaPass delivered an immediate 11% boost in traffic to local cannabis retailers and also in overnight visits to Modesto. In addition to Modesto, both Oakland and Palm Springs highlight their local cannabis industry.

### **Financial Impact**

The addition of retail farms would create some additional staff work, particularly at the outset when licensing processing would require staff to investigate assess sites, make determinations, and determine CEQA findings. Fees for this type of application processing work need to be added to the Unified Fee Schedule (UFS) as these would be a new license type and the license processing is unique because of the appeals procedure. Other potential UFS changes could include appeal fees, license fees based on the number of inspections or based on proposed duration of operations or some combination of both.

### **Strategic Initiatives**

Operational Plan - Dynamic Economy

### **Submitted By:**

Carlos Palacios, County Administrative Officer

### **Recommended By:**

Carlos J. Palacios, County Administrative Officer

### **Artificial Intelligence Acknowledgment:**

Artificial Intelligence (AI) did not contribute to the development of this agenda item.