



MEMORANDUM

April 13, 2018

TO: Board of Supervisors' Transportation/Planning Committee

FROM: Cannabis Interdepartmental Work Group

MEETING DATE: April 18, 2018

SUBJECT: Consideration of Fee Ordinance for Cannabis Cultivation, Retail and Delivery Permits

BACKGROUND

Since your last Committee meeting, the fee study for cultivation, retail, and delivery permits has been completed (see Attachment 1) and an ordinance (see Attachment 2) to adopt the fees proposed in the fee study is now presented to your Committee for consideration.

DISCUSSION/SUMMARY

SCI Consulting Group has prepared a fee study on behalf of the County to determine the fees that should be applied in relation to the cannabis cultivation, retail and delivery permits pursuant to Sections 6.106 and 6.108 of the County Ordinance Code. Consistent with the provisions of Proposition 26, the fee study proposes fees which have been calculated to recover the County's direct and indirect costs to administer the commercial cannabis regulatory structure. A copy of the fee study is provided as Attachment 1. The Executive Summary provides detailed information regarding the purpose of the fee study, the legal framework and the methodology and approach that was adopted by SCI Consulting Group.

In summary, the fee study includes fees for:

- Processing, review and issue of permits, including developing conditions of approval;
- Renewal and transfer of permits;
- Processing, review and issue of CUP's;
- CUP mandatory review process;
- Appeals; and
- Annual monitoring and compliance.

The fee study does not include any fees that are already incurred by the County, for which another fee recovery process is available or that would be incurred in the usual course of business for non-cannabis

related applications (e.g. building permit application fees, business license fees etc). It only includes fees for activities that would not have been required but for the introduction of the commercial cannabis regulatory structure for cultivation and retail sales. As described on page 4 of the fee study, in order to ensure that the fees bear a fair or reasonable relationship to the payor's burden on or benefits from the regulatory program, the fee study proposes the application of flat fees in some instances and deposit-based fees in other instances.

Deposit-based fees

Most types of applications received by the Planning Department are processed 'at-cost' rather than on a fixed-fee basis. Consistent with this approach, the fees contained in Figures 8, 10 to 12, 18, 20 to 22 and 26 are proposed as deposit-based fees. All of these fees fall within existing fee type categories within the Planning Department Fee Deposit/ Schedule, which are those relating to CUP's, CUP Mandatory Reviews and Appeals. The fee study proposes to apply higher deposits for these fees when they are applied in relation to cannabis applications. The proposed higher deposits are based on a detailed calculation of the estimated fees that will be incurred. It is proposed that the Board authorize the CDA Director to adopt the higher deposit amounts identified in the fee study.

Flat fees

The fees in Figures 4 to 7, 9, 13 to 17, 19, 23 to 25, 27 and 28 are proposed as flat fees. All of these fees relate to new processes pursuant to Sections 6.106 and 6.108 of the County Ordinance Code, including application, renewal and transfer of a permit and the application of an annual regulatory program fee. These are proposed as flat fees on the basis that they are new, separate, cannabis-specific processes where the County is reasonably certain of the time necessary for the task or activity and/or (in the case of the annual regulatory program fee and RFP process fees) where it was necessary or appropriate to apply a flat fee to provide certainty and fairness for applicants, and because these fees include an allocation of fees for recovery of costs associated with ordinance preparation and RFP implementation. It is proposed that the Board adopt the flat fees pursuant to the draft ordinance included as Attachment 2 to this memo.

The only fee pursuant to Sections 6.106 and 6.108 that is not proposed as a flat fee, is the appeal fee for applicants, which is proposed as a deposit-based fee.

The flat fees in Figures 5 to 7 and 15 to 17 relate to the application, final selection and permit issuance fees for the RFP processes. The RFP processes were completed in December 2017, prior to completion of the fee study. In determining what fees to apply during the RFP process, staff estimated the anticipated level of effort that would be expended and charged \$8,000 for application, \$4,000 for final selection and \$2,000 for permit issuance. Staff has since revisited these fee estimates through the fee study and found that actual costs incurred are between \$100 and \$800 higher than what was charged for each of these fee types. It is proposed that the Board will adopt the flat fees as specified in the RFP, rather than the higher fees included in the fee study. This is reflected in the draft ordinance for adoption of the fees.

Fees in other jurisdictions

Appendix B of the fee study includes a list of cannabis permit and annual program fees in various jurisdictions in California. The fees vary substantially from jurisdiction to jurisdiction, which reflects the very different approaches that jurisdictions have taken to the permitting process. As identified in the fee

study, it is not an “apples-to-apples” comparison. Some jurisdictions have adopted a ministerial process whereas others require more detailed application review and land use approval.

The County’s proposed annual program fees are similar to those adopted by other jurisdictions however, the proposed application fees are higher than most other jurisdictions identified in this table. This reflects the detailed application review process provided for in Sections 6.106 and 6.108 of the County Ordinance Code, which required a competitive selection process for a capped number of permits available, and the inclusion of an allowance for fees to recover the County’s costs associated with ordinance preparation and the RFP implementation process.

NEXT STEPS

If your committee concurs, staff will present the fee study to the full Board of Supervisors at the May 8, 2018 Board Planning meeting. The fee study would be presented along with an ordinance adopting the proposed flat fees identified in the fee study (see Attachment 2).

Attachments:

- Attachment 1 – County of Alameda, Cannabis Regulatory Fee Study, April 2018, prepared by SCI Consulting Group for County of Alameda Board of Supervisors
- Attachment 2 – Ordinance Adopting Fees

ORDINANCE NO. 2018-_____

AN ORDINANCE ADOPTING REGULATORY FEES FOR PERMITTING CANNABIS OPERATIONS IN THE UNINCORPORATED AREA OF THE COUNTY OF ALAMEDA

SECTION 1

The Board of Supervisors makes the following findings of fact in support of this ordinance:

1. The County has adopted ordinances authorizing and regulating cannabis cultivation, retail and delivery operations, consistent with the Medicinal and Adult-Use Cannabis Regulation and Safety Act (codified, in part, as California Business and Professions Code sections 26000, *et seq.*) (“MAUCRSA”); and
2. Chapter 6.108 of the Alameda County Ordinance Code establishes a requirement to obtain a retail operator’s permit from the County of Alameda’s Community Development Agency (“CDA”) prior to opening a cannabis retail operation (or, dispensary) and a delivery operator’s permit from CDA prior to delivering cannabis to retail customers in the unincorporated area; and
3. Chapter 6.106 of the Alameda County Ordinance Code establishes a requirement to obtain a cultivation operator’s permit from CDA prior to opening a cannabis cultivation operation; and
4. Title 17 of the Alameda County Ordinance Code establishes a requirement to obtain a conditional use permit from the County prior to siting a new cannabis retail operation or cannabis cultivation operation in the unincorporated area of the County of Alameda; and
5. The County of Alameda conducted a study to establish the reasonable costs of administering the cannabis regulations, including the staff time required to establish the regulations, review applications, issue permits, monitor compliance and enforce the regulations; and
6. The fee amounts do not exceed the reasonable cost of permitting and enforcement of the new ordinance and the fees bear a fair or reasonable relationship to the payor’s burden on or benefits from the regulatory program; and
7. This ordinance is adopted pursuant to Government Code sections 54985 and 54986 and any other applicable statutes, and acting on cost studies supplied by CDA.

SECTION 2

NOW, THEREFORE, BE IT ORDAINED by the Board of Supervisors of the County of Alameda, as follows:

Section 6.106.300 is hereby added to the Alameda County General Ordinance Code and reads as follows:

6.106.300 Fee Schedule

A. The applicant shall pay the following non-refundable fees to reimburse the County in accordance with section 6.106.140 of this chapter. The Director may adopt such forms and procedures as necessary to collect the fees.

Cannabis Cultivation Permit Application Fee (Existing Retail Operators)	\$2,900
Cannabis Cultivation Permit Application Fee (Request for Proposals process)	\$8,000
Cannabis Cultivation Permit Final Selection Fee (Request for Proposals process)	\$4,000
Cannabis Cultivation Permit Issuance Fee (Request for Proposals process)	\$2,000
Cannabis Cultivation Permit Renewal Fee	\$3,200
Cannabis Cultivation Permit Annual Regulatory Program Fee	\$60,100
Cannabis Cultivation Permit Transfer Application Fee	\$3,100
Cannabis Cultivation Permit Transfer Issuance Fee	\$1,100

B. For the following fee types, the applicant shall pay fees sufficient to reimburse the county for its actual costs in accordance with section 6.106.140 of this chapter and section 17.54.620 of Title 17 of this code. The applicable fee rates shall be those duly adopted by the county and in effect at the time the county work is performed or the cost is incurred. The Director may collect such fees in advance as a refundable deposit in such amounts as may be established by the Director. The Director may adopt such forms and procedures as necessary to collect the fees.

Cannabis Cultivation Permit Appeal by Applicant (Title 6)	AT-COST/ deposit
Cannabis Cultivation Permit Reconsideration of Application post-Appeal (if remanded for reconsideration) (Title 6)	AT-COST/ deposit
Cannabis Cultivation Conditional Use Permit Application (Title 17)	AT-COST/ deposit
Mandatory Review of Conditional Use Permit for Cannabis Cultivation (Title 17)	AT-COST/ deposit
Cannabis Cultivation Conditional Use Permit Appeal by Applicant (Title 17)	AT-COST/ deposit

Section 6.108.300 is hereby added to the Alameda County General Ordinance Code and reads as follows:

6.108.300 Fee Schedule

A. The applicant is responsible for paying the following fees to reimburse the County in accordance with section 6.108.080 of this chapter. The Director may adopt such forms and procedures as necessary to collect the fees.

Cannabis Retail Permit Application Fee (Request for Proposals process)	\$8,000
Cannabis Retail Permit Final Selection Fee (Request for Proposals process)	\$4,000
Cannabis Retail Permit Issuance Fee (Request for Proposals process)	\$2,000
Cannabis Delivery Permit Application Fee	\$2,400
Cannabis Retail Permit Renewal Fee	\$2,700
Cannabis Delivery Permit Renewal Fee	\$1,100
Cannabis Retail Permit Annual Regulatory Program Fee	\$47,600
Cannabis Retail Permit Transfer Application Fee	\$2,900
Cannabis Delivery Permit Transfer Application Fee	\$2,900
Cannabis Retail Permit Transfer Issuance Fee	\$1,100
Cannabis Delivery Permit Transfer Issuance Fee	\$1,100

B. For the following fee types, the applicant shall pay fees sufficient to reimburse the county for its actual costs in accordance with section 6.108.080 of this chapter and section 17.54.620 of Title 17 of this code. The applicable fee rates shall be those duly adopted by the county and in effect at the time the county work is performed or the cost is incurred. The Director may collect such fees in advance as a refundable deposit in such amounts as may be established by the Director. The Director may adopt such forms and procedures as necessary to collect the fees.

Cannabis Retail Permit Appeal by Applicant (Title 6)	AT-COST/ deposit
Cannabis Delivery Permit Appeal by Applicant (Title 6)	AT-COST/ deposit
Cannabis Retail Permit Reconsideration of Application post-Appeal (if remanded for reconsideration) (Title 6)	AT-COST/ deposit
Cannabis Delivery Permit Reconsideration of Application post-Appeal (if remanded for reconsideration) (Title 6)	AT-COST/ deposit
Cannabis Retail Conditional Use Permit Application (Title 17)	AT-COST/ deposit
Mandatory Review of Conditional Use Permit for Cannabis Retail (Title 17)	AT-COST/ deposit
Cannabis Retail Conditional Use Permit Appeal by Applicant (Title 17)	AT-COST/ deposit

SECTION 3

This ordinance shall take effect and be in force thirty (30) days from and after the date of passage and before the expiration of fifteen (15) days after its passage it shall be published once with the names of the members voting for and against the same in the Inter-City Express, a newspaper published in the County of Alameda.

Adopted by the Board of Supervisors of the County of Alameda, State of California, on the ____ day of _____, 2018, by the following called vote:

AYES:

NOES:

EXCUSED:

WILMA CHAN
President of the Board of Supervisors

ATTEST:

Clerk of the Board of Supervisors,

By: _____
Deputy Clerk

APPROVED AS TO FORM:

DONNA R. ZIEGLER, COUNTY COUNSEL

By: _____
Heather Littlejohn
Deputy County Counsel



COUNTY OF ALAMEDA

CANNABIS REGULATORY FEE STUDY

APRIL 2018
FINAL REPORT v1.1

PREPARED FOR:

**COUNTY OF ALAMEDA
BOARD OF SUPERVISORS**

PREPARED BY:



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COUNTY OF ALAMEDA

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ACKNOWLEDGMENTS

This Cannabis Regulatory Fee Study was prepared by SCI Consulting Group ("SCI") as consultants for the County of Alameda ("County"). The work was performed under the general direction of Elizabeth McElligott, Assistant Planning Director with the Community Development Agency ("CDA").

We would like to acknowledge special efforts made by the following individuals and organizations for this project:

Sophie McGuinness, CDA Planning Department
Rodrigo Orduna, CDA Planning Department
Commander Kelly Miles, Sheriff's Office
Humberto Izquierdo, CDA, Agriculture / Weights and Measures Department
Bill Lepere, Alameda County Public Works Agency, Construction and
Development Department Services
Alan Tam, Alameda County Public Works Agency, Building Inspection Division
Bonnie Terra, Alameda County Fire Department
Eileen Ng, Alameda County Health Care Services Agency
Ron Browder, Environmental Health Department
Elvia Quiroga, Treasurer and Tax Collector's Department

TABLE OF CONTENTS

EXECUTIVE SUMMARY	1
INTRODUCTION	1
LEGAL FRAMEWORK	2
METHODOLOGY AND APPROACH	3
SUMMARY OF GENERAL FINDINGS.....	4
SUMMARY OF RECOMMENDATIONS.....	5
CANNABIS CULTIVATION OPERATOR FEES	7
CULTIVATION OPERATOR PERMIT APPLICATION FEE (EXISTING RETAIL OPERATORS)	7
CULTIVATION OPERATOR PERMIT APPLICATION FEES (RFP PROCESS).....	8
CULTIVATION OPERATOR PERMIT APPEAL FEE	9
CULTIVATION OPERATOR PERMIT RENEWAL FEE.....	9
CULTIVATION OPERATOR CONDITIONAL USE PERMIT FEE	9
CULTIVATION OPERATOR CONDITIONAL USE PERMIT MANDATORY REVIEW FEE	9
CULTIVATION OPERATOR CONDITIONAL USE PERMIT APPEAL FEE	9
CULTIVATION OPERATOR REGULATORY PROGRAM FEE	10
CULTIVATION OPERATOR PERMIT TRANSFER FEE	10
CANNABIS RETAIL OPERATOR FEES	22
RETAIL OPERATOR PERMIT APPLICATION FEES (RFP PROCESS).....	22
RETAIL OPERATOR PERMIT APPEAL FEE	23
RETAIL OPERATOR PERMIT RENEWAL FEE	24
RETAIL OPERATOR CONDITIONAL USE PERMIT FEE	24
RETAIL OPERATOR CONDITIONAL USE PERMIT MANDATORY REVIEW FEE	24
RETAIL OPERATOR CONDITIONAL USE PERMIT APPEAL FEE.....	24
RETAIL OPERATOR REGULATORY PROGRAM FEE	24
RETAIL OPERATOR PERMIT TRANSFER FEES	25
CANNABIS DELIVERY OPERATOR FEES	36
DELIVERY OPERATOR PERMIT APPLICATION FEE.....	36
DELIVERY OPERATOR PERMIT APPEAL FEES.....	36
DELIVERY OPERATOR PERMIT RENEWAL FEE	37
DELIVERY OPERATOR PERMIT TRANSFER FEE	37
OTHER FEES	42
GENERALLY APPLICABLE FEES	42
CANNABIS SPECIFIC FEES	42

TABLE OF CONTENTS (CONTINUED)

REVIEW AND UPDATE OF FEES..... 43

APPENDICES..... 44

 APPENDIX A – ALLOCATION OF ORDINANCE AND RFP DEVELOPMENT COSTS..... 45

 APPENDIX B – SURVEY OF CANNABIS REGULATORY FEES OF OTHER JURISDICTIONS..... 47

TABLE OF FIGURES

FIGURE 1 – SUMMARY OF PROPOSED CULTIVATION OPERATOR FEES	5
FIGURE 2 – SUMMARY OF PROPOSED RETAIL OPERATOR FEES	6
FIGURE 3 – SUMMARY OF PROPOSED DELIVERY OPERATOR FEES	6
FIGURE 4 – CULTIVATION OPERATOR PERMIT APPLICATION FEE (EXISTING OPERATORS)	11
FIGURE 5 – CULTIVATION OPERATOR PERMIT APPLICATION FEE (RFP PROCESS).....	12
FIGURE 6 – CULTIVATION OPERATOR PERMIT FINAL SELECTION FEE (RFP PROCESS)	13
FIGURE 7 – CULTIVATION OPERATOR PERMIT ISSUANCE FEE (RFP PROCESS)	14
FIGURE 8 – CULTIVATION OPERATOR PERMIT APPEAL FEES	15
FIGURE 9 – CULTIVATION OPERATOR PERMIT RENEWAL FEE.....	16
FIGURE 10 – CULTIVATION OPERATOR CONDITIONAL USE PERMIT FEE	17
FIGURE 11 – CULTIVATION OPERATOR CONDITIONAL USE PERMIT MANDATORY REVIEW FEE.....	18
FIGURE 12 – CULTIVATION OPERATOR CONDITIONAL USE PERMIT APPEAL FEE	19
FIGURE 13 – CULTIVATION OPERATOR REGULATORY PROGRAM FEE	20
FIGURE 14 – CULTIVATION OPERATOR PERMIT TRANSFER FEES.....	21
FIGURE 15 – RETAIL OPERATOR PERMIT APPLICATION FEE (RFP PROCESS).....	26
FIGURE 16 – RETAIL OPERATOR PERMIT FINAL SELECTION FEE (RFP PROCESS).....	27
FIGURE 17 – RETAIL OPERATOR PERMIT ISSUANCE FEE (RFP PROCESS).....	28
FIGURE 18 – RETAIL OPERATOR PERMIT APPEAL FEES.....	29
FIGURE 19 – RETAIL OPERATOR PERMIT RENEWAL FEE.....	30
FIGURE 20 – RETAIL OPERATOR CONDITIONAL USE PERMIT FEE	31
FIGURE 21 – RETAIL OPERATOR CONDITIONAL USE PERMIT MANDATORY REVIEW FEE	32
FIGURE 22 – RETAIL OPERATOR CONDITIONAL USE PERMIT APPEAL FEE	33
FIGURE 23 – RETAIL OPERATOR REGULATORY PROGRAM FEE	34
FIGURE 24 – RETAIL OPERATOR PERMIT TRANSFER FEE	35
FIGURE 25 – DELIVERY OPERATOR PERMIT APPLICATION FEE.....	38
FIGURE 26 – DELIVERY OPERATOR PERMIT APPEAL FEES.....	39
FIGURE 27 – DELIVERY OPERATOR PERMIT RENEWAL FEE.....	40
FIGURE 28 – DELIVERY OPERATOR PERMIT TRANSFER FEES	41

TABLE OF FIGURES (CONTINUED)

FIGURE 29 – ALLOCATION OF RFP DEVELOPMENT COSTS 45
FIGURE 30 – ALLOCATION OF ORDINANCE DEVELOPMENT COSTS 46
FIGURE 31 – SURVEY OF CANNABIS REGULATORY FEES OF OTHER JURISDICTIONS 47

EXECUTIVE SUMMARY

INTRODUCTION

The Medical Cannabis Regulation and Safety Act ("MCRSA") was signed into law in October 2015. MCRSA was composed of three bills: AB 266 which established a dual-licensing structure requiring a state license and a local license or permit, AB 243 which established a regulatory and licensing structure for cultivation sites under the Department of Food and Agriculture, and SB 643 which established criteria for licensing of medical cannabis businesses, regulated physicians, and recognized local authority to levy taxes and fees.

On November 8, 2016, the voters of the State of California approved Proposition 64, the "Control, Regulate and Tax Adult Use of Marijuana Act," which decriminalized the adult use of cannabis for non-medical purposes and established a regulatory scheme at the state level.

On June 27, 2017, Senate Bill 94, the "Medicinal and Adult-Use Cannabis Regulation and Safety Act" ("MAUCRSA") repealed and replaced MCRSA. MAUCRSA consolidates the medical MCRSA and adult use (Proposition 64) cannabis statutes.

On September 12, 2017, the County of Alameda ("County") adopted a new regulatory framework including ordinances and performance standards (collectively "Ordinances") to permit and regulate the cultivation, retail sale and delivery of medical cannabis in the unincorporated areas of the County. The County subsequently adopted minor amendments to the Ordinances on December 5, 2017 and is currently in the process of pursuing further amendments to include adult use cannabis, increase the number of permitted cultivation operations and incorporate changes and clarifications to the administration of the commercial cannabis scheme in the unincorporated County.

The purpose of this Cannabis Regulatory Fee Study ("Fee Study") is to establish the legal and policy basis for imposing regulatory fees ("fees") for permitting and regulating the cultivation, retail sale, and delivery of cannabis in the unincorporated areas of the County. The fees will be used to reimburse the County departments for reasonable direct and indirect costs and contracted services attributable to reviewing and acting upon the applications and verifying and enforcing compliance with the Ordinances.

This Fee Study reflects the Ordinances and the proposed further amendments which have been prepared by County staff at the direction of the Alameda County Board of Supervisors. The Ordinances, including proposed changes, are as follows:

- Permitting and regulation of cannabis retail and delivery operations in the unincorporated area of Alameda County. (*Alameda County General Code § 6.108*)
- Land use permitting and regulation of cannabis retail operations in specified zoning districts within the unincorporated area of the County. (*Alameda County General Code § 17.04.010, 17.06.040, 17.38.030, and 17.40.030*)
- Permitting and regulation of cannabis cultivation operators in the unincorporated area of Alameda County, subject to Cultivation Performance Standards adopted by the CDA Director. (*Alameda County General Code § 6.106*)
- Land use permitting and regulation of cannabis cultivation operators in specified zoning districts within the unincorporated area of Alameda County. (*Alameda County General Code § 17.04.010, 17.52.585, and 17.54.130*)

LEGAL FRAMEWORK

In order to impose such fees, this Fee Study will present findings in order to meet the substantive requirements of Proposition 26, which are as follows:

1. Demonstrate that the levy, charge, or other exaction is not a tax; and
2. The amount is not more than necessary to cover the reasonable cost of the governmental activity; and
3. The manner in which those costs are allocated to a payor bears a fair or reasonable relationship to the payor's burden on, or benefits received from, the governmental activity.

Additionally, recent case law has provided further clarification of these substantive requirements, which are as follows:

- Costs need not be "finely calibrated to the precise benefit each individual fee payor might derive."¹
- The payor's burden or benefit from the program is not measured on an individual basis. Rather, it is measured collectively, considering all fee payors.²

¹ Griffith v. County of Santa Cruz (2012)

² Griffith v. County of Santa Cruz (2012); Newhall County Water District v. Castaic Lake Water Agency (2016)

- Demonstrating that the amount collected is no more than is necessary to cover the reasonable costs of the program is satisfied by estimating the approximate cost of the activity and demonstrating that this cost is equal to or greater than the fee revenue to be received.³
- Reasonable costs associated with the creation of the regulatory program may be recovered by the regulatory fee.⁴

METHODOLOGY AND APPROACH

To determine the County's cannabis regulatory fees consistent with these substantive requirements, the cost of permitting and regulating cannabis operations by various County Departments is determined. These costs are then allocated to the payor in a way that demonstrates that the costs bear a fair or reasonable relationship to the payor's burden on or benefits from the program.

The County went through a deliberative process to establish a reasonable expenditure plan to use in setting the fees. An interdepartmental working group representing staff from CDA, the County Administrator's Office, the Sheriff's Office, County Counsel's Office, and the Environmental Health Department worked together to develop the Ordinances and review the proposed fees.

For each of the regulatory fees established by the Fee Study, the County evaluated the Ordinances and identified specific County tasks and activities associated with permitting and enforcement of the regulations. Each County department then determined the specific hours and personnel needed by their department to complete their tasks and activities. The estimated labor hours for each activity were then multiplied by each relevant department's current hourly labor rate for each position completing the task. The hourly labor rates include various salary and benefits, departmental support, supervision, and other administration overhead and similar indirect costs.

The type of costs included in the fees includes labor costs, contracted services, supplies, inter-department charges, and other incidental costs. Detailed supporting analysis tables served as the mechanism to determine specific fee rates and estimated hours, as summarized in this Fee Study. These time estimates and level of effort were then reviewed and evaluated by other County staff, and SCI for their reasonableness.

³ Griffith v. County of Santa Cruz (2012)

⁴ League of California Cities Propositions 26 and 218 Implementation Guide, May 2017, pp. 70-71.

In order to ensure that the fees bear a fair or reasonable relationship to the payor's burden on or benefits from the regulatory program, this Fee Study proposed the use of a deposit-based fee in some instances and a flat fee in other instances.

Where a deposit-based fee is proposed, a fee deposit is required for an initial allotment of estimated staff time and any additional research, review and/or approval that exceeds the estimate is subject to an hourly fee once actual staff hours incurred are known. The deposits are calculated based on each department's hourly rates as of the date of this fee study, but the actual costs will be calculated and charged at the rates that apply on the date the work is conducted. Each department's rates are typically updated every 6 to 12 months in accordance with usual fee adoption processes. If the actual time is less than the estimate, the deposit is subject to a partial refund. Deposit-based fees are commonly used by CDA – Planning in its existing fee structure.

Where a flat fee is proposed, the time estimate remains constant for each application or appeal and the fees are based on each department's hourly rates as at the date of this fee study. Flat fees are used in those instances where the County is reasonably certain of the time necessary for the task or activity.

SUMMARY OF GENERAL FINDINGS

The following general findings from the Fee Study are presented:

1. The County's proposed cannabis regulatory fees are not taxes, but regulatory fees in that the fees are proposed to recover costs associated with the Ordinances, which created a new regulatory framework to permit and regulate the cultivation, retail sales and delivery of cannabis in the unincorporated areas of the County.
2. The County went through a deliberative process to establish reasonable costs for permitting and enforcement of the new regulations.
3. The fee amounts determined by this Fee Study do not exceed the reasonable cost of permitting and enforcement of the new regulations.
4. The fees bear a fair or reasonable relationship to the payor's burden on or benefits from the regulatory program.

SUMMARY OF RECOMMENDATIONS

Based on the findings presented in the Fee Study, it is recommended that the County consider adopting the fees shown in Figure 1 (Cultivation), Figure 2 (Retail), and Figure 3 (Delivery), including:

1. Flat fees (additional detail in Figures 4 to 7, 9, 13 to 17, 19, 23 to 25, 27, and 28); and
2. Deposit-based hourly fees (additional detail in Figures 8, 10 to 12, 18, 20 to 22, and 26). For deposit-based fees, it is recommended that the County authorize the CDA Director to adopt deposit amounts informed by this Fee Study and to charge the applicant for the actual work performed at the applicable hourly rate in effect for the department.

FIGURE 1 – SUMMARY OF PROPOSED CULTIVATION OPERATOR FEES

Fee Description	Fee ¹	Unit	Figure
Cultivation Operator Permit Application Fee (Existing)	\$2,900	per application	4
Cultivation Operator Permit Application Fee (RFP)	\$8,400	per application	5
Cultivation Operator Permit Final Selection Fee (RFP)	\$4,300	per eligible application	6
Cultivation Operator Permit Issuance Fee (RFP)	\$2,800	per issued permit	7
Cultivation Operator Permit Appeal Fee	\$5,900	deposit	8
Application Reconsideration Fee (if required)	\$2,600	deposit	8
Cultivation Operator Permit Renewal Fee	\$3,200	per permit biennially	9
Cultivation Operator CUP Fee	\$25,100	deposit	10
Cultivation Operator CUP Mandatory Review Fee	\$12,800	deposit	11
Cultivation Operator CUP Appeal Fee	\$5,900	deposit	12
Cultivation Operator Regulatory Program Fee	\$60,100	per permit annually	13
Cultivation Operator Permit Transfer Application Fees	\$3,100	per application	14
Permit Issuance Fee	\$1,100	per permit	14

Notes:

¹ Proposed fees are rounded down to the nearest hundred dollars.

FIGURE 2 – SUMMARY OF PROPOSED RETAIL OPERATOR FEES

Fee Description	Fee ¹	Unit	Figure
Retail Operator Permit Application Fee	\$8,100	per application	15
Retail Operator Permit Final Selection Fee	\$4,400	per eligible application	16
Retail Operator Permit Issuance Fee	\$2,800	per permit	17
Retail Operator Permit Appeal Fee	\$5,900	deposit	18
Application Reconsideration Fee (if required)	\$2,600	deposit	18
Retail Operator Permit Renewal Fee	\$2,700	per permit biennially	19
Retail Operator CUP Fee	\$25,200	deposit	20
Retail Operator CUP Mandatory Review Fee	\$12,800	deposit	21
Retail Operator CUP Appeal Fee	\$5,900	deposit	22
Retail Operator Regulatory Program Fee	\$47,600	per permit annually	23
Retail Operator Permit Transfer Application Fee	\$2,900	per application	24
Permit Issuance Fee	\$1,100	per permit	24

Notes:

¹ Proposed fees are rounded down to the nearest hundred dollars.

FIGURE 3 – SUMMARY OF PROPOSED DELIVERY OPERATOR FEES

Fee Description	Fee ¹	Unit	Figure
Delivery Operator Permit Application Fee	\$2,400	per application	25
Delivery Operator Permit Appeal Fee	\$3,300	deposit	26
Application Reconsideration Fee (if required)	\$800	deposit	26
Delivery Operator Permit Renewal Fee	\$1,100	per permit biennially	27
Delivery Operator Permit Transfer Fee	\$2,900	per application	28

Notes:

¹ Proposed fees are rounded down to the nearest hundred dollars.

CANNABIS CULTIVATION OPERATOR FEES

This section determines the costs and associated fees to permit and regulate cannabis cultivation operations in the unincorporated area of Alameda County. The Ordinances are proposed to be amended to allow up to ten (10) cultivation operations to be permitted. Two of the Cannabis Cultivation Operator Permits are available to existing cannabis retail operators in unincorporated Alameda County. These existing retailer operators are required to obtain a Cannabis Cultivation Operator Permit pursuant to Alameda County General Code § 6.106 and a conditional use permit (“CUP”). The remaining Cannabis Cultivation Operator Permits are available to the general public, subject to a Request for Proposal (“RFP”) process for the selected candidate(s) to obtain a Cannabis Cultivation Operator Permit pursuant to Alameda County General Code 6.106 and a CUP.

Figures 4 through 14 detail the direct and indirect costs attributable to the permitting and regulation of cultivation operations pursuant to the Ordinances. The labor costs are segmented by the task/activity and level of effort provided by specific County staff. The hours for each activity were determined by Department staff by diagramming the tasks involved with the activity and the estimated level of effort. These time estimates and level of effort were then reviewed and evaluated by County staff and SCI for their reasonableness. Several of the figures include attribution of costs related to contracted services associated with the preparation of this Fee Study, as identified in Figure 29.

CULTIVATION OPERATOR PERMIT APPLICATION FEE (EXISTING RETAIL OPERATORS)

In order to establish a cultivation operation, the existing retail operators are required to apply for a Cannabis Cultivation Operator Permit. The application fee includes the review of the application by CDA and the Sheriff’s Office. The proposed application fee is \$2,900 per application.

Within twenty (20) business days after the filing of an application, the Director will reject any application and so notify the applicant, if the application has been improperly completed or if it is incomplete. The applicant may amend and refile the application within ten days after such rejection.

CULTIVATION OPERATOR PERMIT APPLICATION FEES (RFP PROCESS)

CDA has prepared a request for proposals (“RFP”) to solicit applications for the establishment of cannabis cultivation operations that need not be affiliated with a permitted cannabis retail operation. The following three fees will be collected at different stages of the application process:

- Application Fee
- Final Selection Fee
- Permit Issuance Fee

The proposed application fee is \$8,400 upon submittal of the initial application. The application fee recovers the cost to review and process the application. This includes detailed review by several departments including CDA and the Sheriff’s Office providing review and comment on aspects of the application as relevant to each department’s expertise as required by the Ordinances.

The final selection phase of the solicitation process includes selection of the eligible applications. If the number of eligible applications exceeds the maximum number of Cannabis Cultivation Operator Permits available, then a competitive evaluation process is conducted. The proposed fee for the competitive selection process is \$4,300 per eligible application. The final selection fee covers the County’s costs to convene a County Selection Committee, which reviews the information provided by County staff and ranks and scores all eligible applications based on criteria provided in the RFP.

Additionally, CDA must establish operating conditions for cannabis cultivation operations for each eligible application that has been submitted for final selection. The proposed fee for establishing the operating conditions and issuing the permit for final selected applications is \$2,800 selected application.

These fees include each applicant’s equal share of the County’s costs incurred to implement the RFP, as identified in Figure 29. The RFP Implementation costs include all work undertaken in the RFP process that was not directly attributable to a specific application. This includes preparation of the RFP Addendum, conducting applicant Information Sessions and drafting template notices and communications with applicants.

CULTIVATION OPERATOR PERMIT APPEAL FEES

An applicant aggrieved by an administrative decision made during the RFP process may appeal that decision to the Board of Supervisors. The appeals fee includes the cost to process the appeal and bring it before the Board at a public hearing. The appeals process would be subject to the hourly billing rates of each relevant department with an initial deposit of \$5,900.

The Board at the appeal hearing may also remand the decision to the CDA Director for reconsideration in light of new information not previously presented. If the decision is remanded to the CDA Director, this would be subject to the hourly billing rates of each relevant department with an initial deposit of \$2,600.

CULTIVATION OPERATOR PERMIT RENEWAL FEE

Cannabis Cultivation Operator Permits are required to be reviewed and renewed every two years. The process for renewal would be subject to the hourly billing rates of each relevant department with an initial deposit of \$3,200 per permit every two years.

CULTIVATION OPERATOR CONDITIONAL USE PERMIT FEE

The Ordinances require a CUP for cannabis cultivation in the Agriculture district. The proposed CUP deposit, which includes allotted time for processing a CUP through to completion of the public hearing, is \$25,100. Any additional staff time for research, review and/or approval that exceeds the deposit is subject to the hourly billing rate of each relevant department. Fees associated with permits, licenses, and approvals typically required by other County departments (e.g., building permits, business licenses, etc.) may also apply, as they would to any non-cannabis related application.

CULTIVATION OPERATOR CONDITIONAL USE PERMIT MANDATORY REVIEW FEE

This Fee Study assumes that the CUP will be reviewed and renewed every four (4) years through a mandatory review process, concurrent with the second 2-year permit renewal period. The CUP mandatory review process would be subject to the hourly billing rates of each relevant department with an initial deposit of \$12,800. This includes allotted time for processing the mandatory review from the initial review and referral to various County departments for comment through to the public hearing.

CULTIVATION OPERATOR CONDITIONAL USE PERMIT APPEAL FEE

The process for an appeal by an applicant of a denied CUP application or rejected renewal of a CUP would be subject to the hourly billing rates of each relevant department with an initial deposit of \$5,900.

CULTIVATION OPERATOR REGULATORY PROGRAM FEE

Figure 13 shows the determination of the fee for full cost recovery for the annual monitoring and compliance of a cultivation operation, as described in the Ordinance and supporting County documents. Unannounced inspections will be performed quarterly. Additionally, the cost of preparing the ordinances is included and recovered over a 10-year period. (See Appendix A). As shown, the proposed fee is \$60,100 annually per permit.

CULTIVATION OPERATOR PERMIT TRANSFER FEES

If the permittee applies to transfer the permit, the following fees will be collected:

- Transfer Application Fee
- Permit Issuance Fee

The applicant for transfer will be required to pay a transfer fee upon submittal of the initial application to recover the cost to review and process the application for transfer. The application for transfer would be subject to the hourly billing rates of each relevant department with an initial deposit of \$3,100 per application for transfer.

Additionally, the fee for establishing the operating conditions and issuing the transfer of permit under an application for transfer of the permit would be subject to the hourly billing rates of each relevant department with an initial deposit of \$1,100 per application for transfer.

FIGURE 4 – CULTIVATION OPERATOR PERMIT APPLICATION FEE (EXISTING OPERATORS)

General Tasks/Activities	CDA - Planning				Sheriff			Labor Hours	Labor Cost	Services, Supplies, & Other Expenses	Total Cost
	Deputy Director	Asst. Deputy Dir.	Planner III	Admin. Staff	Commander	Sergeant	Deputy Sheriff II				
<i>Fully Burdened Hourly Rate</i>	\$215	\$209	\$142	\$128	\$146	\$91	\$76				
Application Review	1.00	3.00	5.00	2.00	1.00	4.00	8.00	24.00	\$2,930	\$0	\$2,930
									Cost Recovery %:	100%	
									Proposed Fee:	\$2,900 per application	

* Ordinance 6.106.050 and 6.106.060

FIGURE 5 – CULTIVATION OPERATOR PERMIT APPLICATION FEE (RFP PROCESS)

General Tasks/Activities	CDA - Planning				Sheriff			Other	Labor Hours	Labor Cost	Services, Supplies, & Other Expenses	Total Cost
	Deputy Director	Asst. Deputy Dir.	Planner III	Admin. Staff	Commander	Sergeant	Deputy Sheriff II	AWM Deputy Commissioner				
<i>Fully Burdened Hourly Rate</i>	\$215	\$209	\$142	\$128	\$146	\$91	\$76	\$118				
Application Review	1.00	3.00	5.00	2.00	1.00	4.00	8.00	2.00	26.00	\$3,166	\$0	\$3,166
RFP Implementation ¹	-	-	-	-	-	-	-	-	-	-	-	\$5,264
Total	1.00	3.00	5.00	2.00	1.00	4.00	8.00	2.00	26.00	\$3,166	\$0	\$8,429
									Cost Recovery %:	100%		
* Ordinance 6.106.090									Proposed Fee:	\$8,400	per application	

Notes:

¹ See Appendix A. RFP implementation costs are allocated equally to the 11 cultivation and dispensary permits.

FIGURE 6 – CULTIVATION OPERATOR PERMIT FINAL SELECTION FEE (RFP PROCESS)

General Tasks/Activities	CDA - Planning						Labor Hours	Labor Cost	Services, Supplies, & Other Expenses	Total Cost
	Deputy Director	Asst. Deputy Dir.	Planner III	Admin. Staff	Sheriff's Office Commander	AWM Deputy Commissioner				
<i>Fully Burdened Hourly Rate</i>	\$215	\$209	\$142	\$128	\$146	\$118				
Competitive Selection Process	4.00	2.00	3.00	2.00	3.00	2.00	16.00	\$2,635	\$0	\$2,635
RFP Implementation ¹	-	-	-	-	-	-	-	-	-	\$1,755
Total	4.00	2.00	3.00	2.00	3.00	2.00	16.00	\$2,635	\$0	\$4,389
								Cost Recovery %:	100%	
* Ordinance 6.106.110								Proposed Fee:	\$4,300	per eligible application

Notes:

¹ See Appendix A. RFP implementation costs are allocated equally to the 11 cultivation and dispensary permits.

FIGURE 7 – CULTIVATION OPERATOR PERMIT ISSUANCE FEE (RFP PROCESS)

General Tasks/Activities	CDA - Planning				Labor Hours	Labor Cost	Services, Supplies, & Other Expenses	Total Cost
	Deputy Director	Asst. Deputy Dir.	Planner III	Admin. Staff				
<i>Fully Burdened Hourly Rate</i>	\$215	\$209	\$142	\$128				
Establish Operating Conditions	1.00	1.00	3.00	2.00	7.00	\$1,106	\$0	\$1,106
RFP Implementation ¹	-	-	-	-	-	-	-	\$1,755
Total	1.00	1.00	3.00	2.00	7.00	\$1,106	\$0	\$2,861
						Cost Recovery %:	100%	
* Ordinance 6.106.110						Proposed Fee:	\$2,800	per issued permit

Notes:

¹ See Appendix A. RFP implementation costs are allocated equally to the 11 cultivation and dispensary permits.

FIGURE 8 – CULTIVATION OPERATOR PERMIT APPEAL FEE

General Tasks/Activities	CDA - Planning				Sheriff		Labor Hours	Labor Cost	Services, Supplies, & Other Expenses	Total Cost
	Deputy Director	Asst. Deputy Dir.	Planner III	Admin. Staff	Commander	Sergeant				
<i>Fully Burdened Hourly Rate</i>	\$215	\$209	\$142	\$128	\$146	\$91				
Appeal to Board of Supervisors	1.00	10.00	17.00	4.00	3.00	3.00	38.00	\$5,943	\$0	\$5,943
Application Reconsideration ¹	1.00	2.00	13.00	1.00	0.00	0.00	17.00	\$2,607	\$0	\$2,607
							Cost Recovery %:	100%		
							Proposed Appeal Fee:	\$5,900 deposit		
* Ordinance 6.106.120							Proposed Reconsideration Fee (if required):	\$2,600 deposit		

Notes:

¹ Estimated cost for reconsideration of an application by the CDA if an application is remanded by the Board of Supervisors to the Director.

FIGURE 9 – CULTIVATION OPERATOR PERMIT RENEWAL FEE

General Tasks/Activities	CDA - Planning					Other		Labor Hours	Labor Cost	Services, Supplies, & Other Expenses	Total Cost
	Deputy Director	Asst. Deputy Dir.	Planner III	Admin. Staff	Senior Code Enforcement Officer	AWM Deputy Commissioner	AWD Investigator III				
<i>Fully Burdened Hourly Rate</i>	\$215	\$209	\$142	\$128	\$165	\$118	\$116				
Cultivation Permit Renewal	0.50	5.00	5.00	2.00	4.00	2.00	2.00	20.50	\$3,247	\$0	\$3,247
									Cost Recovery %:	100%	
* Ordinance 6.106.130									Proposed Fee:	\$3,200 per permit biennially	

FIGURE 10 – CULTIVATION OPERATOR CONDITIONAL USE PERMIT FEE

General Tasks/Activities ¹	CDA - Planning				Sheriff			Other Agencies				Labor Hours	Labor Cost	Services, Supplies, & Other Expenses	Total Cost	
	Deputy Director	Asst. Deputy Dir.	Planner III	Admin. Staff	Commander	Sergeant	Deputy Sheriff II	AWM Deputy Commissioner	Fire Dept.	Building Dept.	Public Works					
<i>Fully Burdened Hourly Rate</i>	\$215	\$209	\$142	\$128	\$146	\$91	\$76	\$118	\$131	\$140	\$125					
App. Review / Compliance Assessment	0.00	8.00	15.00	0.00	1.50	1.50	0.00	0.00	0.00	0.00	0.00	26.00	\$4,158	\$0	\$4,158	
Refer to Other Agencies	0.00	2.00	2.00	2.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	6.00	\$958	\$0	\$958	
Feedback from Referral Agencies	0.00	8.00	7.50	0.00	2.00	1.50	1.50	2.00	2.00	2.00	2.00	28.50	\$4,309	\$0	\$4,309	
Assess Ability to Meet Requirements	0.50	8.00	15.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	23.50	\$3,910	\$0	\$3,910	
Public Input	0.00	8.00	7.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	15.50	\$2,737	\$0	\$2,737	
Staff Report	1.00	8.00	22.50	2.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	33.50	\$5,338	\$0	\$5,338	
Public Hearing	1.00	7.00	8.00	2.00	3.00	3.00	0.00	0.00	0.00	0.00	0.00	24.00	\$3,782	\$0	\$3,782	
Total	2.50	49.00	77.50	6.00	6.50	6.00	1.50	2.00	2.00	2.00	2.00	157.00	\$25,191	\$0	\$25,191	
																Cost Recovery %: 100%
																Proposed Fee: \$25,100 deposit per CUP

* Ordinance 17.52.585

Notes:

¹ A pre-application meeting will be required prior to submittal of an application for a CUP. The pre-application will be subject to the usual fees of \$150 per department that is required to attend.

FIGURE 11 – CULTIVATION OPERATOR CONDITIONAL USE PERMIT MANDATORY REVIEW FEE

General Tasks/Activities	CDA - Planning					Sheriff			Other Agencies				Labor Hours	Labor Cost	Services, Supplies, & Other Expenses	Total Cost
	Deputy Director	Asst. Deputy Dir.	Planner III	Admin. Staff	Senior Code Enforcement Officer	Commander	Sergeant	Deputy Sheriff II	AWM Deputy Commissioner	Fire Dept.	Building Dept.	Public Works				
<i>Fully Burdened Hourly Rate</i>	\$215	\$209	\$142	\$128	\$165	\$146	\$91	\$76	\$118	\$131	\$140	\$125				
Refer out to Other Agencies	0.00	1.00	2.00	1.00	3.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	7.00	\$1,116	\$0	\$1,116
Feedback from Referral Agencies	0.00	3.00	3.00	0.00	0.00	2.00	1.50	1.50	2.00	2.00	2.00	2.00	19.00	\$2,625	\$0	\$2,625
Assess Ability to Meet Requirements:	0.50	3.00	7.50	1.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12.00	\$1,928	\$0	\$1,928
Public Input	0.00	3.00	5.00	1.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	9.00	\$1,465	\$0	\$1,465
Staff Report	1.00	3.00	7.50	1.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12.50	\$2,035	\$0	\$2,035
Public Hearing	1.00	7.00	8.00	1.00	0.00	3.00	3.00	0.00	0.00	0.00	0.00	0.00	23.00	\$3,654	\$0	\$3,654
Total	2.50	20.00	33.00	5.00	3.00	5.00	4.50	1.50	2.00	2.00	2.00	2.00	82.50	\$12,822	\$0	\$12,822
														Cost Recovery %:	100%	
														Proposed Fee:	\$12,800 deposit	

* Ordinance 17.52.585

FIGURE 12 – CULTIVATION OPERATOR CONDITIONAL USE PERMIT APPEAL FEE

General Tasks/Activities	CDA - Planning				Sheriff		Labor Hours	Labor Cost	Services, Supplies, & Other Expenses	Total Cost
	Deputy Director	Asst. Deputy Dir.	Planner III	Admin. Staff	Commander	Sergeant				
<i>Fully Burdened Hourly Rate</i>	\$215	\$209	\$142	\$128	\$146	\$91				
CUP Appeal by Applicant	1.00	10.00	17.00	4.00	3.00	3.00	38.00	\$5,943	\$0	\$5,943
								Cost Recovery %:	100%	
* Ordinance 17.54.710								Proposed Fee:	\$5,900	deposit per appeal

FIGURE 13 – CULTIVATION OPERATOR REGULATORY PROGRAM FEE

General Tasks/Activities ¹	CDA - Planning			Sheriff			Labor Hours	Labor Cost	Services, Supplies, & Other Expenses	Total Cost
	Assistant Deputy Dir.	Senior Code Enforcement Officer	Code Investigator III	Sergeant	Deputy Sheriff II	AWD Investigator III				
<i>Fully Burdened Hourly Rate</i>	\$209	\$165	\$142	\$91	\$76	\$116				
Preparation	1.00	3.00	7.50	0.00	0.00	7.50	19.00	\$2,639	\$0	\$2,639
Inspection	7.50	7.50	7.50	3.00	6.00	7.50	39.00	\$5,472	\$0	\$5,472
Reporting	2.00	7.50	25.00	0.00	1.00	7.50	43.00	\$6,152	\$0	\$6,152
Ordinance Development ¹	-	-	-	-	-	-	-	-	-	\$786
Total per Inspection	10.50	18.00	40.00	3.00	7.00	22.50	101.00	\$14,262	\$0	\$15,048
								Cost Recovery %:	100%	
								Proposed Fee:	\$60,100 per permit annually	
								Estimated Annual Volume:	10 permits	
								Estimated Annual Revenue:	\$601,000	

* Ordinance 17.52.585

Notes:

¹ Hours are per quarterly inspection.

² Ordinance development costs are spread over 10 years. See Appendix A for more information.

FIGURE 14 – CULTIVATION OPERATOR PERMIT TRANSFER FEES

General Tasks/Activities	CDA - Planning					Sheriff				Labor Hours	Labor Cost	Services, Supplies, & Other Expenses	Total Cost
	Director	Deputy Director	Asst. Deputy Dir.	Planner III	Admin. Staff	Commander	Sergeant	Deputy Sheriff II	AWM Deputy Commissioner				
<i>Fully Burdened Hourly Rate</i>	\$215	\$215	\$209	\$142	\$128	\$146	\$91	\$76	\$118				
Application Review	0.00	1.00	3.00	5.00	2.00	1.00	4.00	8.00	2.00	26.00	\$3,166	\$0	\$3,166
Establish Operating Conditions	0.00	1.00	1.00	3.00	2.00	0.00	0.00	0.00	0.00	7.00	\$1,106	\$0	\$1,106
										Cost Recovery %:	100%		
										Proposed Transfer Application Fee:	\$3,100 per application		
										Proposed Permit Issuance Fee:	\$1,100 per permit		

* Ordinance 6.106.150

CANNABIS RETAIL OPERATOR FEES

This section determines the costs and associated fees to permit and regulate cannabis retail operations in the unincorporated area of Alameda County. The Ordinances allow up to five (5) cannabis retail operations to be permitted. Each new cannabis retail operator is subject to an RFP process and the selected candidate(s) obtaining a Cannabis Retail Operator Permit pursuant to Chapter 6.108 of the County General Code and a CUP. This will allow three (3) new cannabis retail operators, one in the West County and two in East County, in addition to the two (2) existing cannabis retail operators that are currently in operation.

Figures 15 through 24 detail the direct and indirect labor costs attributable to the permitting and regulation of retail operations pursuant to the Ordinances. The labor costs are segmented by the task/activity and level of effort provided by specific County staff. The hours for each activity were determined by Department staff by diagramming the tasks involved with the activity and the estimated level of effort. These time estimates and level of effort were then reviewed and evaluated by other County staff and SCI for their reasonableness. Several of the figures include attribution of costs related to contracted services associated with the preparation of this Fee Study, as identified in Figure 29.

RETAIL OPERATOR PERMIT APPLICATION FEES (RFP PROCESS)

CDA has prepared an RFP to solicit applications for the establishment of additional cannabis retail operations in the East County and is in the process of preparing an RFP for the establishment of an additional retail operation in the West County. The following three fees will be collected at different stages of the application process:

- Application Fee
- Final Selection Fee
- Permit Issuance Fee

The proposed application fee is \$8,100 upon submittal of the initial application. The application fee recovers the cost to review and process the application. This includes detailed review by several departments including CDA and the Sheriff's Office providing review and comment on aspects of the application as relevant to each department's expertise as required by the Ordinances.

The final selection phase of the solicitation process includes selection of the eligible applications. If the number of eligible applications exceeds the maximum number of Cannabis Retail Operator Permits available for the area, as delineated in Chapter 6.108,

then a competitive evaluation process is conducted. The proposed fee for the competitive selection process is \$4,400 per eligible application. The final selection fee covers the County's costs to convene a County Selection Committee, which reviews the information provided by County staff and ranks and scores all eligible applications based on criteria provided in the RFP.

Additionally, CDA must establish operating conditions for cannabis retail operations for each eligible application that has been submitted for final selection. The proposed fee for establishing the operating conditions and issuing the permit for the final selected applicants is \$2,800 per selected applicant.

These fees include each applicant's equal share of the County's costs incurred to implement the RFP, as identified in Figure 29. The RFP Implementation costs include all work undertaken in the RFP process that was not directly attributable to a specific application. This includes preparation of the RFP Addendum, conducting applicant Information Sessions and drafting template notices and communications with applicants.

RETAIL OPERATOR PERMIT APPEAL FEES

Under the ordinances as originally adopted, an applicant aggrieved by an administrative decision made during the RFP process could appeal that decision to an Administrative Panel comprised of County staff. The decision of this panel was appealable in turn to the Board of Supervisors. The ordinances are proposed to be amended to remove the Administrative Panel review, and to provide the opportunity for any appeals to go straight to the Board of Supervisors. The appeal fees include the cost to process the appeal and bring it before the Administrative Panel or the Board at a public hearing. The appeal process would be subject to the hourly billing rates of each department with an initial deposit of \$5,900.

The Board at the appeal hearing may also remand the decision to the CDA Director for reconsideration in light of new information not previously presented. If the decision is remanded to the CDA Director, this would be subject to the hourly billing rates of each relevant department with an initial deposit of \$2,600.

RETAIL OPERATOR PERMIT RENEWAL FEE

Cannabis Retail Operator Permits are required to be reviewed and renewed every two years. The process for renewal would be subject to the hourly billing rates of each relevant department with an initial deposit of \$2,700 per permit every two years.

RETAIL OPERATOR CONDITIONAL USE PERMIT FEE

The Ordinances require a CUP for cannabis retail operators in the zoning districts specified in the Ordinance. The proposed CUP deposit, which includes allotted time for processing a CUP through to completion of the public hearing, is \$25,200. Any additional research, review and/or approval that exceed the deposit is subject to the hourly billing rate of each relevant department. Fees associated with permits, licenses, and approvals typically required by other County departments (e.g., building permits, business licenses, etc.) may also apply, as they would to any non-cannabis related application.

RETAIL OPERATOR CONDITIONAL USE PERMIT MANDATORY REVIEW FEE

The Fee Study assumes the CUP will be reviewed and renewed every four (4) years through a mandatory review process, concurrent with the second 2-year permit renewal period. The CUP mandatory review process would be subject to the hourly billing rates of each relevant department with an initial deposit of \$12,800. This includes allotted time for processing the mandatory review from the initial review and referral of the application for renewal to various County departments for comment through to the public hearing.

RETAIL OPERATOR CONDITIONAL USE PERMIT APPEAL FEE

The process for an appeal by an applicant of a denied CUP application or rejected renewal of a CUP would be subject to the hourly billing rates of each relevant department with an initial deposit of \$5,900.

RETAIL OPERATOR REGULATORY PROGRAM FEE

Figure 23 shows the determination of the fee for full cost recovery for the annual monitoring and compliance of a retail operation, as described in the Ordinance and supporting County documents. Unannounced inspections will be performed quarterly. Additionally, the cost of preparing the ordinances is included and recovered over a 10-year period. (See Appendix A). As shown, the proposed fee is \$47,600 annually per permit.

RETAIL OPERATOR PERMIT TRANSFER FEES

If the permittee applies to transfer the permit, the following fees will be collected:

- Application Fee
- Permit Issuance Fee

The applicant for transfer will be required to pay a transfer fee upon submittal of the initial application to recover the cost to review and process the application for transfer. The application for transfer would be subject to the hourly billing rates of each relevant department with an initial deposit of \$2,900 per application for transfer.

Additionally, the fee for establishing the operating conditions and issuing the transfer of permit under an application for transfer of the permit would be subject to the hourly billing rates of each relevant department with an initial deposit of \$1,100 per application for transfer.

FIGURE 15 – RETAIL OPERATOR PERMIT APPLICATION FEE (RFP PROCESS)

General Tasks/Activities	CDA - Planning				Sheriff			Labor Hours	Labor Cost	Services, Supplies, & Other Expenses	Total Cost
	Deputy Director	Asst. Deputy Dir.	Planner III	Admin. Staff	Commander	Sergeant	Deputy Sheriff II				
<i>Fully Burdened Hourly Rate</i>	\$215	\$209	\$142	\$128	\$146	\$91	\$76				
Application Review	1.00	3.00	5.00	2.00	1.00	4.00	8.00	24.00	\$2,930	\$0	\$2,930
RFP Implementation ¹	-	-	-	-	-	-	-	-	-	-	\$5,264
Total	1.00	3.00	5.00	2.00	1.00	4.00	8.00	24.00	\$2,930	\$0	\$8,193
									Cost Recovery %:	100%	
* Ordinance 6.108.090									Proposed Fee:	\$8,100	per application

Notes:

¹ See Appendix A. RFP implementation costs are allocated equally to the 11 cultivation and dispensary permits.

FIGURE 16 – RETAIL OPERATOR PERMIT FINAL SELECTION FEE (RFP PROCESS)

General Tasks/Activities	CDA - Planning				Sheriff		Labor Hours	Labor Cost	Services, Supplies, & Other Expenses	Total Cost
	Director	Asst. Deputy Dir.	Planner III	Admin. Staff	Commander	Environmental Health Dept.				
<i>Fully Burdened Hourly Rate</i>	\$215	\$209	\$142	\$128	\$146	\$125				
Competitive Selection Process	4.00	2.00	3.00	2.00	3.00	2.00	16.00	\$2,649	\$0	\$2,649
RFP Implementation	-	-	-	-	-	-	-	-	-	\$1,755
Total	4.00	2.00	3.00	2.00	3.00	2.00	16.00	\$2,649	\$0	\$4,403
								Cost Recovery %:	100%	
* Ordinance 6.108.110								Proposed Fee:	\$4,400	per eligible application

Notes:

¹ See Appendix A. RFP implementation costs are allocated equally to the 11 cultivation and dispensary permits.

FIGURE 17 – RETAIL OPERATOR PERMIT ISSUANCE FEE (RFP PROCESS)

General Tasks/Activities	CDA - Planning				Labor Hours	Labor Cost	Services, Supplies, & Other Expenses	Total Cost
	Deputy Director	Asst. Deputy Dir.	Planner III	Admin. Staff				
<i>Fully Burdened Hourly Rate</i>	\$215	\$209	\$142	\$128				
Establish Operating Conditions	1.00	1.00	3.00	2.00	7.00	\$1,106	\$0	\$1,106
RFP Implementation Costs ¹	-	-	-	-	-	-	-	\$1,755
Total Issuance Costs	1.00	1.00	3.00	2.00	7.00	\$1,106	\$0	\$2,861
						Cost Recovery %:	100%	
* Ordinance 6.108.110, 6.108.120						Proposed Fee:	\$2,800 per permit	

Notes:

¹ See Appendix A. RFP implementation costs are allocated equally to the 11 cultivation and dispensary permits.

FIGURE 18 – RETAIL OPERATOR PERMIT APPEAL FEE

General Tasks/Activities	CDA - Planning				Sheriff		Labor Hours	Labor Cost	Services, Supplies, & Other Expenses	Total Cost	
	Deputy Director	Asst. Deputy Dir.	Planner III	Admin. Staff	Commander	Sergeant					
<i>Fully Burdened Hourly Rate</i>	\$215	\$209	\$142	\$128	\$146	\$91					
Administrative Review Appeal	1.00	10.00	17.00	4.00	3.00	3.00	38.00	\$5,943	\$0	\$5,943	
Appeal to Board of Supervisors	1.00	10.00	17.00	4.00	3.00	3.00	38.00	\$5,943	\$0	\$5,943	
Application Reconsideration ¹	1.00	2.00	13.00	1.00	0.00	0.00	17.00	\$2,607	\$0	\$2,607	
	Cost Recovery %:							100%			
	Proposed Administrative Review Appeal Fee:							\$5,900	deposit		
	Proposed Appeal to Board of Supervisors Fee:							\$5,900	deposit		
	Proposed Application Reconsideration Fee (if required):							\$2,600	deposit		

* Ordinance 6.108.130

Notes:

¹ Estimated cost for reconsideration of an application by the CDA if an application is remanded by the Board of Supervisors to the Director.

FIGURE 19 – RETAIL OPERATOR PERMIT RENEWAL FEE

General Tasks/Activities	CDA - Planning					Labor Hours	Labor Cost	Services, Supplies, & Other Expenses	Total Cost
	Deputy Director	Asst. Deputy Dir.	Planner III	Admin. Staff	Senior Code Enforcement Officer				
<i>Fully Burdened Hourly Rate</i>	\$215	\$209	\$142	\$128	\$165				
Retail Operator Permit Renewal	0.50	5.00	5.00	2.00	4.00	16.50	\$2,779	\$0	\$2,779
							Cost Recovery %:	100%	
* Ordinance 6.108.040							Proposed Fee:	\$2,700 per permit biennially	

FIGURE 20 – RETAIL OPERATOR CONDITIONAL USE PERMIT FEE

General Tasks/Activities ¹	CDA - Planning				Sheriff			Other Agencies				Labor Hours	Labor Cost	Services, Supplies, & Other Expenses	Total Cost
	Deputy Director	Asst. Deputy Dir.	Planner III	Admin. Staff	Commander	Sergeant	Deputy Sheriff II	Environmental Health Department	Fire Dept.	Building Dept.	Public Works				
<i>Fully Burdened Hourly Rate</i>	\$215	\$209	\$142	\$128	\$146	\$91	\$76	\$125	\$131	\$140	\$125				
App. Review / Compliance Assessment	0.00	8.00	15.00	0.00	1.50	1.50	0.00	0.00	0.00	0.00	0.00	26.00	\$4,158	\$0	\$4,158
Refer out to Other Agencies	0.00	2.00	2.00	2.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	6.00	\$958	\$0	\$958
Feedback from Referral Agencies	0.00	8.00	7.50	0.00	2.00	1.50	1.50	2.00	2.00	2.00	2.00	28.50	\$4,323	\$0	\$4,323
Assess Ability to Meet Requirements	0.50	8.00	15.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	23.50	\$3,910	\$0	\$3,910
Public Input	0.00	8.00	7.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	15.50	\$2,737	\$0	\$2,737
Staff Report	1.00	8.00	22.50	2.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	33.50	\$5,338	\$0	\$5,338
Public Hearing	1.00	7.00	8.00	2.00	3.00	3.00	0.00	0.00	0.00	0.00	0.00	24.00	\$3,782	\$0	\$3,782
Total	2.50	49.00	77.50	6.00	6.50	6.00	1.50	2.00	2.00	2.00	2.00	157.00	\$25,205	\$0	\$25,205
													Cost Recovery %:	100%	
														Proposed Fee:	\$25,200 deposit per CUP

* Ordinance 17.06.040, 17.38.030 and 17.40.030

Notes:

¹ A pre-application meeting will be required prior to submittal of an application for a CUP. The pre-application will be subject to the usual fees of \$150 per department that is required to attend.

FIGURE 21 – RETAIL OPERATOR CONDITIONAL USE PERMIT MANDATORY REVIEW FEE

General Tasks/Activities	CDA - Planning					Sheriff			Other Agencies				Labor Hours	Labor Cost	Services, Supplies, & Other Expenses	Total Cost
	Deputy Director	Asst. Deputy Dir.	Planner III	Admin. Staff	Senior Code Enforcement Officer	Commander	Sergeant	Deputy Sheriff II	Environmental Health Department	Fire Dept.	Building Dept.	Public Works				
<i>Fully Burdened Hourly Rate</i>	\$215	\$209	\$142	\$128	\$165	\$146	\$91	\$76	\$125	\$131	\$140	\$125				
Refer out to Other Agencies	0.00	1.00	2.00	1.00	3.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	7.00	\$1,116	\$0	\$1,116
Feedback from Referral Agencies	0.00	3.00	3.00	0.00	0.00	2.00	1.50	1.50	2.00	2.00	2.00	2.00	19.00	\$2,639	\$0	\$2,639
Assess Ability to Meet Requirements	0.50	3.00	7.50	1.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12.00	\$1,928	\$0	\$1,928
Public Input	0.00	3.00	5.00	1.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	9.00	\$1,465	\$0	\$1,465
Staff Report	1.00	3.00	7.50	1.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12.50	\$2,035	\$0	\$2,035
Public Hearing	1.00	7.00	8.00	1.00	0.00	3.00	3.00	0.00	0.00	0.00	0.00	0.00	23.00	\$3,654	\$0	\$3,654
Total	2.50	20.00	33.00	5.00	3.00	5.00	4.50	1.50	2.00	2.00	2.00	2.00	82.50	\$12,836	\$0	\$12,836
														Cost Recovery %:	100%	
														Proposed Fee:	\$12,800 deposit	

* Ordinance 17.06.040, 17.38.030 and 17.40.030

FIGURE 22 – RETAIL OPERATOR CONDITIONAL USE PERMIT APPEAL FEE

General Tasks/Activities	CDA - Planning				Sheriff		Labor Hours	Labor Cost	Services, Supplies, & Other Expenses	Total Cost
	Deputy Director	Asst. Deputy Dir.	Planner III	Admin. Staff	Commander	Sergeant				
<i>Fully Burdened Hourly Rate</i>	\$215	\$209	\$142	\$128	\$146	\$91				
CUP Appeal by Applicant	1.00	10.00	17.00	4.00	3.00	3.00	38.00	\$5,943	\$0	\$5,943
								Cost Recovery %:	100%	
* Ordinance 17.54.710								Proposed Fee:	\$5,900	deposit per appeal

FIGURE 23 – RETAIL OPERATOR REGULATORY PROGRAM FEE

General Tasks/Activities ¹	CDA - Planning			Sheriff			Labor Hours	Labor Cost	Services, Supplies, & Other Expenses	Total Cost
	Director Assistant Deputy Dir.	Senior Code Enforcement Officer	Code Investigator III	Sergeant	Deputy Sheriff II	Environmental Health				
<i>Fully Burdened Hourly Rate</i>	\$209	\$165	\$142	\$91	\$76	\$125				
Preparation	1.00	3.00	7.50	0.00	0.00	0.00	11.50	\$1,769	\$0	\$1,769
Inspection	7.50	7.50	7.50	3.00	6.00	1.00	32.50	\$4,727	\$0	\$4,727
Reporting	2.00	7.50	25.00	0.00	1.00	1.00	36.50	\$5,407	\$0	\$5,407
Ordinance Development ²	-	-	-	-	-	-	-	-	-	\$786
Total per Inspection	10.50	18.00	40.00	3.00	7.00	2.00	80.50	\$11,902	\$0	\$11,902
Cost Recovery %:								100%		
Proposed Fee:								\$47,600 per permit annually		
Estimated Annual Volume:								5 permits		
Estimated Annual Revenue:								\$238,000		

* Ordinance 6.108.110 and 6.108.120

Notes:

¹ Hours shown are per quarterly inspection.

² Ordinance development costs are spread over 10 years. See Exhibit A for more information.

FIGURE 24 – RETAIL OPERATOR PERMIT TRANSFER FEES

General Tasks/Activities	CDA - Planning				Sheriff			Labor Hours	Labor Cost	Services, Supplies, & Other Expenses	Total Cost
	Deputy Director	Asst. Deputy Dir.	Planner III	Admin. Staff	Commander	Sergeant	Deputy Sheriff II				
<i>Fully Burdened Hourly Rate</i>	\$215	\$209	\$142	\$128	\$146	\$91	\$76				
Application Review	1.00	3.00	5.00	2.00	1.00	4.00	8.00	24.00	\$2,930	\$0	\$2,930
Establish Operating Conditions	1.00	1.00	3.00	2.00	0.00	0.00	0.00	7.00	\$1,106	\$0	\$1,106
									Cost Recovery %:	100%	
									Proposed Transfer Application Fee:	\$2,900 per application	
									Proposed Permit Issuance Fee:	\$1,100 per permit	

* Ordinance 6.108.150

CANNABIS DELIVERY OPERATOR FEES

This section determines the costs and associated fees to permit and regulate cannabis deliveries in the unincorporated area of Alameda County. The Ordinances require delivery operators to obtain a Cannabis Delivery Operator Permit. The Cannabis Delivery Operator Permit can only be issued to a "brick and mortar" cannabis retailer holding a valid license or permit to sell cannabis issued by a California city or county. There is no limit to the number of delivery permits. No CUP is required.

Figures 25 through 28 detail the direct and indirect costs attributable to the permitting and regulation of delivery operations pursuant to the Ordinances. The costs are segmented by the task/activity and level of effort provided by specific County staff. The hours for each activity were determined by Department staff by diagramming the tasks involved with the activity and the estimated level of effort. These time estimates and level of effort were then reviewed and evaluated by other County staff and SCI for their reasonableness.

DELIVERY OPERATOR PERMIT APPLICATION FEE

The proposed application fee is \$2,400 upon submittal of the application. The application fee recovers the cost to review and process the application.

DELIVERY OPERATOR PERMIT APPEAL FEE

Under the ordinances as originally adopted, an applicant aggrieved by an administrative decision made during the Cannabis Delivery Operator Permit application process could appeal that decision to an Administrative Panel comprised of County staff. The decision of this panel was appealable in turn to the Board of Supervisors. The ordinances are proposed to be amended to remove the Administrative Panel review, and to provide the opportunity for any appeals to go straight to the Board of Supervisors. The appeals fee includes the cost to process the appeal and bring it before the Administrative Plan or the Board at a public hearing. The appeals process would be subject to the hourly billing rates of each relevant department with an initial deposit of \$3,300.

The Board at the appeal hearing may also remand the decision to the CDA Director for reconsideration in light of new information not previously presented. If the decision is remanded to the CDA Director, this would be subject to the hourly billing rates of each relevant department with an initial deposit of \$800.

DELIVERY OPERATOR PERMIT RENEWAL FEE

Cannabis Delivery Operator Permits are required to be reviewed and renewed every two years. The process for renewal would be subject to the hourly billing rates of each relevant department with an initial deposit of \$1,100 per permit every two years.

DELIVERY OPERATOR PERMIT TRANSFER FEE

If the permittee applies to transfer the permit, a transfer application fee will be collected. The applicant for transfer will be required to pay a transfer application fee upon submittal of the initial application to recover the cost to review and process the application for transfer. The application for transfer would be subject to the hourly billing rates of each relevant department with an initial deposit of \$2,900 per application for transfer.

FIGURE 25 – DELIVERY OPERATOR PERMIT APPLICATION FEE

General Tasks/Activities	CDA - Planning			Sheriff			Labor Hours	Labor Cost	Services, Supplies, & Other Expenses	Total Cost
	Asst. Deputy Dir.	Planner III	Admin. Staff	Commander	Sergeant	Deputy Sheriff II				
<i>Fully Burdened Hourly Rate</i>	\$209	\$142	\$128	\$146	\$91	\$76				
Processing Applications	1.00	10.00	3.00	1.00	1.00	2.00	18.00	\$2,403	\$0	\$2,403
								Cost Recovery %:	100%	
* Ordinance 6.108.090								Proposed Fee:	\$2,400 per application	

FIGURE 26 – DELIVERY OPERATOR PERMIT APPEAL FEE

General Tasks/Activities	CDA - Planning				Sheriff		Labor Hours	Labor Cost	Services, Supplies, & Other Expenses	Total Cost	
	Deputy Director	Asst. Deputy Dir.	Planner III	Admin. Staff	Commander	Sergeant					
<i>Fully Burdened Hourly Rate</i>	\$215	\$209	\$142	\$128	\$146	\$91					
Administrative Review Appeal	1.00	3.00	10.00	3.00	3.00	3.00	23.00	\$3,358	\$0	\$3,358	
Appeal to Board of Supervisors	1.00	3.00	10.00	3.00	3.00	3.00	23.00	\$3,358	\$0	\$3,358	
Application Reconsideration ¹	0.50	1.00	3.00	1.00	0.00	0.00	5.50	\$871	\$0	\$871	
	Cost Recovery %:							100%			
	Proposed Administrative Review Appeal Fee:							\$3,300 deposit			
	Proposed Appeal to Board of Supervisors Fee:							\$3,300 deposit			
	Proposed Application Reconsideration Fee (if required):							\$800 deposit			

* Ordinance 6.108.130

Notes:

¹ Estimated cost for reconsideration of an application by the CDA if an application is remanded by the Board of Supervisors to the Director.

FIGURE 27 – DELIVERY OPERATOR PERMIT RENEWAL FEE

<u>CDA - Planning</u>							
General Tasks/Activities	Asst. Deputy Dir.	Planner III	Admin. Staff	Labor Hours	Labor Cost	Services, Supplies, & Other Expenses	Total Cost
<i>Fully Burdened Hourly Rate</i>	\$209	\$142	\$128				
Delivery Permit Renewal	1.00	5.00	2.00	8.00	\$1,175	\$0	\$1,175
					Cost Recovery %:	100%	
* Ordinance 6.108.040					Proposed Fee:	\$1,100 per permit biennially	

FIGURE 28 – DELIVERY OPERATOR PERMIT TRANSFER FEES

General Tasks/Activities	CDA - Planning				Sheriff			Labor Hours	Labor Cost	Services, Supplies, & Other Expenses	Total Cost
	Deputy Director	Asst. Deputy Dir.	Planner III	Admin. Staff	Commander	Sergeant	Deputy Sheriff II				
<i>Fully Burdened Hourly Rate</i>	\$215	\$209	\$142	\$128	\$146	\$91	\$76				
Application Review	1.00	3.00	5.00	2.00	1.00	4.00	8.00	24.00	\$2,930	\$0	\$2,930
									Cost Recovery %:	100%	
* Ordinance 6.108.150									Proposed Transfer Application Fee:	\$2,900	per application

OTHER FEES

In addition to the fees outlined in this Fee Study, there are other fees that permit holders will be required to pay if / when they are incurred. These other fees fall into two categories:

- Fees that apply in relation to cannabis operations as they would to any other permitted operation in unincorporated Alameda County; and
- Fees that may be developed in relation to cannabis operations, but which are outside the scope of this Fee Study.

Permit holders will be informed of these fees in the usual course of applications and communications with the involved County departments.

GENERALLY APPLICABLE FEES

Existing fees that apply to cannabis operations include, for example, business license fees and, building permit application fees. These fees which generally apply to cannabis operations the same as they would to any other permitted business in unincorporated Alameda County. Another example is the appeals fee payable by any applicant other than an applicant for a cannabis operator permit or CUP pursuant to this fee study. For example, if a third party (e.g., any person other than a permit applicant) appeals a decision in relation the RFP's cannabis operator permit or a CUP processes described identified above, that appellant will pay a nominal appeal fee of \$250. This amount is consistent with the fee that is generally applied by the Planning Department for third-party appeals in planning processes brought by anyone other than the applicant.

CANNABIS SPECIFIC FEES

The County may develop and apply additional fees specific to commercial cannabis operations through the relevant departments' usual processes, but which are outside the scope of this fee study. Such fees are outside the scope of this study because although they are related to cannabis operations, they are not directly associated with the implementation of the Ordinances. This includes, for example, the existing Cannabis Worker Permit fee administered by the Sheriff's Office. This fee of \$150 is payable (in addition to a \$57 Live Scan fee) by any cannabis retailer who wishes to add an additional staff member to their business. This fee relates to the Sheriff's Office's staff time associated with processing and reviewing applications for each additional staff member.

REVIEW AND UPDATE OF FEES

This Fee Study has been prepared in the context of an emerging industry and regulatory framework for legalized cannabis in the State of California. It may be appropriate for the County to review and update the fees identified in this Fee Study:

- when the program under the Ordinances has been implemented for a period of time sufficient for the County to have had an opportunity to review the actual costs incurred in processing and monitoring permits and to have achieved some efficiencies in processing applications and undertaking monitoring and compliance;
- if the Ordinances are substantially amended such that the time and/or processes involved are substantially changed; or
- at the expiration of 10 years, which is the period over which the Fee Study proposes recovery of the County's Ordinance Preparation costs identified in Appendix A.

APPENDICES

Appendix A – Allocation of Ordinance and RFP Development Costs

Appendix B – Survey of Cannabis Regulatory Fee of Comparable Jurisdictions

APPENDIX A – ALLOCATION OF ORDINANCE AND RFP DEVELOPMENT COSTS

Figure 29 is a breakdown of each involved County department's costs associated with developing the RFPs. This includes fees from CDA and contracted services for preparation of the regulatory fee program and associated consulting services. The total cost is divided by the maximum number of permits that can be issued pursuant to the Ordinances and allocated to the application fees by the percentages indicated.

FIGURE 29 – ALLOCATION OF RFP DEVELOPMENT COSTS

County Agency/Department	Total Cost
CDA - Planning	\$72,500
Contracted Services (SCI Consulting Group)	\$24,000
Total Cost	\$96,500
Number of Permits	11
Annual Cost Recovery per Permit	\$8,773
Allocation to Permit Application Fee (60%)	\$5,264
Allocation to Permit Final Selection Fee (20%)	\$1,755
Allocation to Permit Issuance Fee (20%)	\$1,755

Figure 30 below is a breakdown of each involved County department's costs associated with developing the Ordinances. This includes fees from CDA, which led and coordinated the development of the Ordinances, as well as the Sheriff's Office and the Environmental Health Department, all of which participated in the development of the Ordinances. The total cost of hourly time spent by each of these departments during the development of the Ordinances is combined, divided between the maximum number of permits that can be issued pursuant to the Ordinances and allocated as a cost item in the Annual Regulatory Program Fees for cultivation and retailers. The cost recovery for these ordinance development costs is proposed to be recovered over a period of 10 years.

FIGURE 30 – ALLOCATION OF ORDINANCE DEVELOPMENT COSTS

County Agency/Department	Total Cost
CDA - Planning	\$420,037
Sheriff's Department	\$15,000
Agriculture / Weights and Measures Department	\$14,688
Environmental Health Department	\$21,924
Total Cost	\$471,649
Total Cost Recovery Per Year (10 Years)	\$47,165
Number of Permits	15
Annual Cost Recovery per Permit	\$3,144
Cost per Quarterly Permit Inspection	\$786

APPENDIX B – SURVEY OF CANNABIS REGULATORY FEES OF OTHER JURISDICTIONS

The figure below is a comparison of the cannabis permit and annual regulatory fees of Alameda County jurisdictions and other jurisdictions throughout California. The survey provides general information and is not intended to provide “apples-to-apples” comparisons. Many jurisdictions have yet to establish annual regulatory fees, and others have deposit-based permit fees that don't indicate the final permit fees for comparison purposes. However, the survey illustrates that the County's proposed fees are reasonable in the context of the fees that have been charged in other jurisdictions.

FIGURE 31 – SURVEY OF CANNABIS REGULATORY FEES OF OTHER JURISDICTIONS

Jurisdiction	Application Permit Fees		Annual Program Fees	
	Cultivation	Dispensary	Cultivation	Dispensary
<u>Alameda County Jurisdictions</u>				
City of Alameda	NA	TBD	TBD	TBD
City of Berkeley	\$6,744	\$6,744		
City of Hayward	\$5,000 Deposit	\$5,000 Deposit	TBD	TBD
City of Oakland	NA	\$8,800	NA	\$60,000
City of Pleasanton	NA	NA	NA	NA
City of San Leandro	TBD	TBD	TBD	TBD
County of Alameda	\$15,500	\$15,300	\$60,100	\$47,600
<u>Other Jurisdictions</u>				
City of Carson	\$25,000 Deposit	\$25,000 Deposit		
City of Cathedral City	\$7,500	\$7,500		
City of Davis	\$2,800	\$2,800	NA	\$40,630
City of Greenfield	\$7,830	\$7,830		\$60,758
City of Hollister	\$7,492	\$7,492		
City of Sacramento	\$9,700 - \$28,910	\$23,610		
City of San Francisco	\$8,973	\$8,973		
City of San Jose	\$3,874 Deposit	\$3,874 Deposit	\$149,132	\$149,132
City of Thousand Oaks	NA	\$12,507		
City of West Hollywood	TBD	\$9,880	TBD	TBD
County of Humboldt	\$5,162	\$5,162		
County of Marin	\$6,000	\$6,000	\$12,000	TBD
County of Monterey	\$4,474	\$4,474		
County of Trinity	\$5,000	\$5,000		

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