

# Proposition 64 Cohort 3 Grant Program

## Local Evaluation Plan

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## Project Background

The County of San Diego's Planning & Development Services is tackling a pressing issue in the unincorporated areas of San Diego County: the addressing of unlicensed cannabis operations. These unauthorized activities present both public safety and environmental hazards.

The core problem this initiative addresses is twofold. First, unlicensed cannabis dispensaries and cultivation sites jeopardize public safety and bring forth environmental challenges but they also bring forth environmental challenges. Second, there's a necessity to ensure that the licensed cannabis operations adhere to all local regulatory standards.

To address these issues, the Code Compliance Cannabis Licensing and Enforcement Program has been set into motion. The mission of this program is not only to address unlicensed cannabis activities but also to pave the way for licensed operators, ensuring their full compliance with local cannabis regulations.

The program's primary objective is straightforward: To ensure no unauthorized cannabis dispensaries or cultivation sites operate within the unincorporated areas of the county. Concurrently, a secondary goal is to closely monitor licensed establishments, ensuring they operate in accordance with local ordinances.

Essential to this initiative is the allocation of resources. Positions such as Code Compliance, Land Use/Environmental Planning, and Land Use Technician roles are pivotal to oversee cannabis regulations and handle the licensing processes. To empower these roles, the grant will be utilized for training, equipment, data gathering and analysis, and community engagement activities.

In essence, this project aims to ensure a safe and compliant cannabis market, reflecting the community's needs and addressing the inherent risks associated with illicit cannabis operations.

### **Scope of the Project, Roles, and Responsibilities:**

The project's activities are streamlined to ensure adherence to cannabis regulations, counteract unlicensed cannabis activities, facilitate the smooth operation of licensed inspections, and handle escalations and serious violations appropriately. The following dot

point describe the roles and responsibilities of staff directly and indirectly involves in prop 64 grant management:

- **Role of the Planning Manager:** The Planning Manager will intermittently provide support, with a notable role in the development of the local regulations and recommendations.

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- **Role of the Division Chief:** This role is more strategic in nature, intervening in cases that require escalation. They will provide guidance, particularly when serious violations occur.
- **Land Use/Environmental Planner III:** This position is tasked with supervising the daily operations of the Planner II's. This includes monitoring licensing inspections and overseeing tasks such as background checks, license transfers, and modifications in business activities, ensuring that these facilities remain compliant with local ordinances.
- **Land Use/Environmental Planner II:** There are two positions under this category:
  - The first Planner II will manage grant activities and assist Planner III's in developing Program guidelines and regulations. They will also assist with field activities, processing of cannabis license transfers, renewals, and modifications.
  - The second Planner II will focus on routine inspections at licensed facilities and enforcement against illicit cannabis activities. Additionally they will provide support to the lead Planner II in managing grant activities and processing of cannabis license transfers, renewals, and modifications.

### **Target Audience:**

The target of the project encompasses two distinct groups, each with its own set of implications, interactions, and expectations concerning the program.

First and foremost, the project aims to serve the broader public. This audience is vast, diverse, and crucial, as they represent the residents, consumers, and stakeholders within the region. Their involvement and awareness are essential for several reasons. The public is a major stakeholder, and their safety, health, and well-being are at the forefront of the project's objectives. They stand to benefit from a regulated, transparent, and compliant cannabis industry in their locality. By ensuring the elimination of illicit cannabis operations and promoting regulated, licensed establishments, the project seeks to create an environment where the public can confidently access cannabis products, understanding that they meet the highest safety and quality standards. Additionally, a well-informed public can aid in the identification and reporting of unregulated activities, furthering the goals of the project.

The second primary target is the facilities license holders. These are the entities directly involved in the cannabis industry, be it in cultivation, manufacturing, distribution, retail, or any other associated activity. For these license holders, the project plays a pivotal role in defining and ensuring the adherence to the standards and regulations set by the authorities. They are directly affected by the policies, procedures, and actions stemming

from the project. Furthermore, by ensuring regular inspections, the project provides a framework for these establishments to continuously uphold and improve their operations. The project's engagement with this group is crucial, as their cooperation, feedback, and proactive involvement are key to the project's overall success. In essence, they represent the operational side of the industry, whose actions and compliance directly impact the safety and well-being of the public.

**Goals and Objectives:**

**Goal 1: Ensure no illegal cannabis dispensaries or grows are in operation in the unincorporated county.**

- Objectives for Goal 1:
  1. Conduct regular inspections of known and suspected cannabis establishments in the unincorporated areas.
  2. Collaborate with local law enforcement to share intelligence and actionable data regarding potential illicit operations.
  3. Utilize technological solutions, such as satellite imagery or drones, to identify potential illegal cultivation sites.

**Goal 2: Ensure licensed cannabis facilities in the unincorporated county are in compliance with local regulatory ordinances.**

- Objectives for Goal 2:
  1. Establish a comprehensive licensing and renewal process to regularly assess the compliance status of cannabis facilities.
  2. Provide training sessions and educational resources to staff and facility operators, ensuring they are well-informed about local regulations and best practices.
  3. Schedule routine compliance inspections for all licensed facilities, targeting high-risk areas or operations first.
  4. Implement a transparent reporting system where non-compliance issues are documented, addressed, and rechecked to ensure resolution.

### **PDS-Cannabis Program Logic Model Explanation:**

The PDS-Cannabis Program Logic Model visually outlines the systematic structure and approach the program takes to address issues related to cannabis in a particular community or region. This explanation breaks down each segment of the model.

#### **1. Inputs:**

- **Staffing:** For any program to be successful, appropriate staffing is vital. This implies that there are dedicated individuals, be they on a full-time, part-time, or contractual basis, overseeing and implementing the tasks of the PDS-Cannabis Program.
- **Data Collection & Enhancement:** Gathering accurate and relevant data is crucial. This data could include statistics on illegal cannabis operations, trends in cannabis-related activities, or feedback from stakeholders. Enhancing data involves refining and analyzing the collected data to make it more useful for the program's objectives.
- **Professional Services:** This could encompass consulting services, external audits, or other specialized services that contribute to the program's efficiency and effectiveness.

## **2. Activities:**

- Routine Inspections, Enforcement and Surveillance: Continuous monitoring and enforcement of regulations are imperative. This could involve patrolling suspected areas, using technology for surveillance, or collaborating with law enforcement agencies.
- Equipment, Staff Training: The right tools and training ensure that staff can efficiently execute their roles. Training might cover regulatory compliance, use of surveillance tools, or community engagement strategies.
- IT Enhancements and Abatements: The adoption of technological solutions, like software for tracking illegal operations or platforms for stakeholders to report suspicious activities, can significantly boost the program's efficiency.

## **3. Outputs:**

- Education, Guidance, and Enforcement: These three will ensure that stakeholders are well-informed about cannabis regulations, they are provided with guidance on compliance, and there's a mechanism to enforce the regulations.
- Tools and Education to Perform Tasks: Providing tangible resources, like manuals, digital platforms, or workshops, supports stakeholders in understanding and adhering to the program's expectations.
- Inspection App and Tracking Guidance Sheets: Leveraging technology, such as apps, can simplify the inspection process. Tracking sheets can help in documenting and monitoring cannabis-related activities.
- Removal of Unlawful Material: Active steps are taken to eradicate any illegal cannabis grows or shut down unauthorized dispensaries.

## **4. Outcomes:**

- Improve Operator Knowledge: Ensuring that those who run cannabis operations are well-versed in regulations, permits, and best practices.
- Improve Customer Service and Task Efficiency: Streamlining processes and enhancing stakeholder interactions to ensure tasks are executed promptly and effectively.
- Inspection Efficiency and Timely Follow-ups: Making certain that inspections are not just done but are also followed up on in a timely manner to ensure compliance.
- Reduce Environmental & Safety concerns: Addressing the potential environmental hazards and public safety concerns linked with cannabis cultivation and sale.

**5. Community Impacts:**

- Elevated Levels of Public Safety: Ensuring that community members feel safe and that potential threats from unlicensed cannabis activities are minimized.
- Marked Reductions in Public Complaints: A tangible reduction in grievances from the community about unlicensed cannabis activities.
- Substantial Decreases in unlicensed Cultivation Practices: Actively reducing the number of unlicensed cannabis grows in the region.
- Mitigation of Environmental Impacts: Actively working to lessen any negative environmental effects resulting from cannabis cultivation or related activities.

In conclusion, The PDS-Cannabis Program Logic Model offers a comprehensive framework, detailing how resources (inputs) are utilized in activities to produce specific outputs. These outputs, in turn, lead to desired outcomes, culminating in broader, long-term community impacts.

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**Data Matrix:** The evaluation matrix for the PDS-Cannabis Program provides a comprehensive framework to meticulously track, monitor, and assess the implementation and efficacy of the program's key elements. This matrix acts as an invaluable tool, ensuring the alignment of program components with their intended outcomes, thus paving the way for continuous improvement.

Input/Resource/Activity/Output	Data Element(s)	Data Source(s)	Frequency of Data Collection
<b>Input</b>			
Staffing	Number of staff, Staff roles	HR Records, Staff Organization Chart	Bi-Annually
Data Collection & Enhancement	Inspection Data, Online inquiries, phone call inquiries	Data collection tools, Surveys, feedback	Bi-Annually
Professional Services	Number of abatements	Contracts and Invoices	Annually
<b>Activity</b>			
Enforcement and Surveillance	Unincorporated Areas and Licensed Facilities, Number of referrals and complaints- illegal operations	Facility Log, Surveillance system data	Monthly
Equipment, Staff Training	Training sessions held; Equipment acquired	Training records, Equipment purchase records	Bi-Annually
IT Enhancements and Abatements	Software upgrades, Technology-related incidents	IT logs, Incident reports	Bi-Annually
<b>Output</b>			
Education, Guidance, and Enforcement	Number of stakeholders educated; Guidance documents distributed	Education session logs, Document release records	Monthly
Tools and Education to Perform Tasks	Number of staff trainings provided. Stakeholder Workshops conducted	Training distribution records, Workshop attendee lists	Bi-Annually
Inspection App and Tracking Guidance Sheets	App usage metrics, Number of tracking sheets used	App analytics, Tracking sheet submissions	Daily
Removal of Unlawful Material	Number of unlawful materials removed	Removal operation logs	Bi-Annually

### **Process Evaluation Research Design:**

**Mixed Methods:** Considering the nature of the program, a mixed-methods approach will be the most appropriate. This design combines both quantitative (e.g., number of staff trainings provided, app usage metrics) and qualitative data (e.g., feedback from staff and stakeholders, content of guidance documents) to provide a holistic understanding of the program's implementation and impact.

### **Project Components Involving Cannabis Facilities (licensed and unlicensed)**

**Tracking/Documentation:** Components or activities like code enforcement, investigations, will be thoroughly documented in specialized logs. For instance, IT enhancements will be used to develop an inspection application to ensure all data is being captured in real time. Additionally, code enforcement actions will have dedicated enforcement logs.

### **Project Oversight Structure and Decision-making Process:**

The project will be overseen by a core project management team comprising A Project Manager, Land Use Environmental Planner III, and 2 Land Use Environmental Planner II's. The LUEP III will be responsible for leading the teams and making high-level, project-related decisions, ensuring alignment with project objectives and stakeholder expectations.

### **Monitoring, Effectiveness, and Adjustments:**

Continuous monitoring of project components will be done using the data sources and frequencies mentioned in the evaluation matrix. Determining effectiveness will be a collaborative effort between the project lead, the LUEP II's, and Financial Officer ensuring an unbiased assessment. Planning Manager and Chief will also provide programmatic input and improvements. Any necessary adjustments to the program will be made based on these evaluations, ensuring the program remains agile and responsive to changing needs.

### **Implementation to Fidelity:**

Procedures to ensure fidelity include regular training sessions for staff, meticulous documentation of all activities, and periodic reviews of the program's progress against set internal goals. Administrative evaluations conducted by upper management via periodic meetings can further ensure that the program is being implemented as intended and adhering to its foundational principles.

### **Analysis of Quantitative and Qualitative Process Data:**

**Quantitative Data Analysis:** Quantitative data will be analyzed using various statistical tools. Descriptive statistics will provide an overview of the data, summarizing main patterns observed to determine differences or associations in the data, especially when comparing different program components or participant groups. Quantitative data is maintained by the LUEP II via internal platforms that encompass inspection data.

**Qualitative Data Analysis:** For the qualitative data will be analyzed internally by project leads. We will execute this by identifying recurring themes, sharing observations and insights via meetings and briefings in efforts to strengthen our program, especially in areas of potential improvement.

In summary, the PDS Cannabis program will employ a comprehensive and mixed-method approach to process evaluation, ensuring a holistic understanding of its operations and impact. Central to this approach is the use of a well-maintained database, specialized logs, and periodic reviews. The blend of both quantitative and qualitative data analysis ensures not just an understanding of numbers and metrics but also the underlying nuances and sentiments associated with the program. Regular oversight by a project management team and the collaboration of the project lead with external evaluators will ensure that the program remains on track, effective, and true to its intended objectives.

### **Appendix A: Additional Logic Model Guidance**

The Cannabis Licensing Program is set to collaborate with other entities, notably the San Diego Sheriff's Department, to weave together efforts and ensure that facilities without the proper authorization to operate a cannabis business come into compliance. It's important to note that while the program aims to address various activities associated with illegal cannabis cultivation and respond to related complaints, not all of these activities receive financial backing from the grant.

Primarily, the grant's focus is on overseeing activities that, prior to the allocation of funds from the Prop 64 Cohort 3, weren't adequately staffed by full-time employees (FTE) specifically on boarded for the purpose of establishing the program. Quarterly data collection and reporting will give an encompassing view of all the activities connected to cannabis operations. Nonetheless, the primary application of the grant is to oversee these operations and lay down the foundation for a robust licensing program. The San Diego County Department of Planning & Development Services (PDS) – Cannabis Licensing Program commits to accurate reporting on all aspects of cannabis operations. Further, they will provide a thorough breakdown detailing how the

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grant funds have been utilized, ensuring transparency and adherence to the stipulations of the Prop 64 grant.

When a code officer is repositioned to conduct a site investigation or to collaborate with other agencies, such instances will be meticulously documented. The grant is primarily allocated to oversee activities and achieve several objectives:

1. Confirm that no unauthorized cannabis dispensaries or cultivation sites are active within the unincorporated areas of the county.
2. Commence enforcement procedures swiftly once an illicit facility is identified.
3. Ensure that potential threats to public health and safety are minimized and that repeated illegal operations are deterred.
4. Confirm that all licensed cannabis establishments in the unincorporated regions of the county adhere to the local regulatory standards.

In situations concerning unauthorized cannabis complaints, the approach involves utilizing both code officers and a grant-funded employees (FTE) to carry out the necessary site evaluations. The Grant Manager holds the responsibility to elucidate how the funds have been expended, especially in response to activities that are not wholly supported by the grant. This ensures accountability and transparency in the allocation and use of funds.