

February 8, 2021

Dear Honorable Supervisors,

My husband and I own a diversified farm called Radicle Herbs which is a regenerative cannabis farm with a 5k outdoor and 5k mixed light on the valley floor in Covelo.

I am in support of the MCA memo and CCAG's memo.

Firstly, I specifically want to address transferability. For my specific situation I hold a second license that is 5k mixed light. This license we have been waiting to transfer for over a year to a friend who has been cultivating in Mendocino County for many years but has never owned land and this is an opportunity for him and his wife to have a business of their own. We have done everything to have everything turned in on time and correctly. The only hold up is the permit is still only in embossed receipt form because the county has not completed the SSHR. If we can't transfer this license soon we will have to go into yet another growing season in partnership together which makes things complicated for everyone. I am in support of MCA's recommendation to allow the transferability of permits to an individual/entity with an embossed receipt or annual license. This permit will stay with the property, it is not creating a new license, just changing the 'licensed operator'.

Secondly, I 100% support the thoughtful steps laid out by MCA on how to move forward with Phase 1 and ensure the ability for Phase 1 cultivators to be able to continue to cultivate:

With consideration given to the lack of staff available, we recommend that the Board give staff the following direction:

1. Focus the efforts of remaining county staff on the review of resubmitted complete applications, not existing incomplete application materials.
2. Cease sending '30-day Corrections Required' notices to existing applicants, and instead communicate to all Phase 1 operators that they need to perfect their application and resubmit a complete application via digital means as soon as possible.
3. Expedite the creation of a digital portal so that Phase 1 operators can directly resubmit their complete application documents via the portal. (MCA recommends using Accela as the software solution, which is used by CDFA and with which all license holders are familiar.)
4. Confirm that either applicants or any hired consultant (not just those that submit a questionnaire for the county to post) may conduct the work of preparing and resubmitting complete application documents, as well as conduct and prepare the checklist materials and Project Description for final review by the County to certify CEQA compliance to CDFA.
5. Explore the use of out-of-county employees who can work remotely to fill in local employment gaps.
6. Explore the use of third party contractors to conduct certain components of the Phase 1 program for which staffing is inadequate.
7. Prioritize the processing and review of existing applications prior to accepting any new applications.

8. Reopen the provisions that allow relocation for Phase 1 applicants or permit holders to more appropriate parcels.
9. Allow all Phase 1 applicants to reassign/transfer their application, not just an annual issued permit, to a new person or entity.
10. Report back on outstanding items referred to County Counsel, such as elimination of LiveScans for employees and other streamlining measures.
11. Consistently monitor approaches taken by other jurisdictions to achieve site-specific CEQA compliance and engage with CDFA on all potential solutions, specifically:
  - Santa Cruz Cannabis Program (Designating Cannabis as an Agricultural Activity)
  - Trinity County Urgency Ordinance (Using an Urgency Ordinance to ensure continuity of business operations for current existing operators)
  - Sonoma County's draft ministerial program with mitigated negative declaration and best management practices.

In addition, I believe that a more thoughtful consideration of expansion should be considered. One that takes a closer look at the implications of what unfettered expansion would mean. Is cultivation of 10% of acreage worth the possible risk of 'extinction' of many small cultivators. I believe that beginning with 1 acre expansion, which is a 4x increase in cultivation size and seeing how that goes for a couple of years and then taking a look at larger expansion after that would be a much better sustainable economic and environmental approach.

Thank you for all of your time and consideration on these important issues.

Sincerely,  
Blaire and Daniel AuClair

