

From: "Casey O'Neill" <casey@cagrowers.org>
To: <bos@co.mendocino.ca.us>
Date: 9/11/2017 9:40 PM
Subject: Cannabis Agenda Items for 9-12-17

TO: Mendocino County Board of Supervisors and County Staff

FROM: Casey O'Neill, HappyDay Farms, Vice-Chair California Growers Association, Acting Chair Mendocino County Growers Alliance

This letter is in regards to the Fee Hearing scheduled for Tuesday, Sept 12th. We appreciate the fact that the county is willing to look at the proposed costs, especially those applied to the smallest farms in the cannabis space. It is of utmost importance that the county work with cultivators to encourage participation in the regulatory program and to help farmers become ready for the rapidly approaching process of State Licensure.

It is not uncommon for government to help champion the needs of a given business sector that carries importance within its sphere of influence. Cannabis farmers are small business owners who find themselves often bewildered by the requirements of the new regulations, many of which are more excessive than those faced by any other business. Now is the time for county government to lead the way in crafting workable processes to bridge the gap between our current reality and the future of state licensure. The following are comments regarding fees and other items:

Cottage Fees/Costs: Cottage Cultivators should not be subject to the entirety of the permitting program. The county should lower its costs by exempting Cottage from all but a simple application registration that would take minimal time to process. Inspections should be waived unless a complaint occurs, and the cost should be pegged at something like \$100. The "25 plant rule" has set a functional precedent that the county should uphold via minimizing overall Cottage requirements. The State program will have many hoops to jump through, it is important that the county minimize them. It is also of utmost importance that Cottage Permittees be able to legally use space within their homes during the season as needed, and to be able to engage in nonvolatile manufacturing at home.

Time-Out: Cultivators in any zone in which cultivation is allowed should have the option of registering with the Dept of Ag to take a "time-out". This should not be limited to 1 year in 5.

Provisional/In Good Standing: It is important that the county provide support to the farmers who are working their way through myriad regulatory processes (many of which are not applied to other types of agriculture). There should be an issuance of "Good Standing" for all cultivators who have submitted applications. The state program is coming up rapidly and farmers need to be able to take the next step in the process. The County should let State Licensure serve as the mechanism to deal with cultivators who are not able to progress. At the local level, we need to be providing support to our farmers during this difficult time of transition.

Ag-Exempt Structures- Though this item was not included in the Staff Memo, it has been deeply frustrating for the community to have seen Board Direction given to allow Ag-Exempt buildings, but still to be told by Building and Planning that this Classification is not authorized. It is imperative that we sort this out as soon as possible. It is also important to continue looking into the ADA exemptions for businesses with fewer than 5 employees.

Now is the time for the County to support a future that includes a thriving cannabis industry known for its small-scale, artisan cultivation practices and its sustainable environmental standard. We arrive there together, or not at all. Thank you for your time and efforts on this complicated public policy issue.

--

Casey O'Neill, HappyDay Farms,
Vice Chair California Growers Association
Cell: 707-354-1546 Casey@cagrowers.org
<http://www.calgrowersassociation.org/>