



Mendocino County Board of Supervisors  
501 Low Gap Road  
Ukiah, CA 95482

September 13, 2021

RE: Streamlining the Permit Resubmission Application Process

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Honorable Supervisors,

The status of our legal cannabis operators in Mendocino County is in question, as we face the uncertainty of the County ordinance. The difficulties that cultivators have faced since the legal program first opened up to applications have turned into unnecessary obstacles.

In the interest of assisting the County Cannabis Program Manager's processing of permit applications, MCA offers the following suggestions for improving this process. These suggestions are simple, common sense ways to "fix" problematic barriers and hoops, both large and small, in order to expedite obtaining Annual Permits in a more timely fashion.

**Overall Recommendation #1: MCA strongly urges the County to provide an Appendix G #15168 checklist that can be accessed through the County website. Currently major setbacks for applicants are caused by very minor corrections.**

1. Provide standard language for applicants to include in the application. Current language provided on the County website is far from clear or sufficient. There are discrepancies in the current language provided on the County website as acceptable vs. previously approved Appendix G templates now deemed by the County to be insufficient to use.
2. Appendix G information entry fields for licenses: One of the original test cases that was approved for use asked only for the dates of permit approval and expiration. Now, the County wants actual permit numbers included as well. Recommend that you revert to the original test case approved example of required permit dates.
3. When one applicant explains language on the application form as "It is indicated in the 'Cultivation and Operations Plan' the County response that stalled the application was "Cultivation and Operations Plan for which agency?"
4. When an applicant filled in "Water: On-Site Domestic Water Well. The site features an on-site domestic water well and on-site septic system." The response from County staff that delayed application processing was: "The use of 'domestic' here gives the impression that there may be a separate commercial water source."

**5. Direct County staff to exercise common sense judgement in their assessment of cultivation sites.** One recent applicant was delayed because they had planted 20+ cedar trees along a road and outside of the fenced garden. The reason for planting the trees was to block the view of a large illegal grow that occurred next to them. The County had seen the trees on the satellite picture and deemed them to be “additional canopy space.” The County refused to move forward in processing the application until they perform a site visit. However, the County won’t schedule a site visit and the Country refuses to accept photos as proof from the applicant.

**6. Direct County staff to update old inaccurate information about an applicant’s circumstances.** One MCA member notes that their primary power source in County records is listed as a generator when all permit renewals since 2018 include their PG&E installation and use. This applicant requested a face-to-face application review to see what information staff is using for Appendix G review, but has yet to secure that review. It seems likely that the County is using old and inaccurate information on which to base their review.

**Each time an application is rejected for format, grammar, punctuation, or wording issues, that application is delayed. Once corrections have been submitted the application is placed at the bottom of the stack and now must wait in line alongside new portal submissions and other applications in the queue.** Often these bureaucratic “glitches” seem to reflect a lack of understanding or familiarity with the regulations; perhaps since there are too few staff handling the applications, there simply isn’t enough time for staff to familiarize themselves with the complicated language.

**Overall Recommendation #2: MCA urges the Board of Supervisors and the MCP to convene a special working group with stakeholders to help clarify application requirements and streamline the review process.**

Thank you for your help in “fixing” this arduous process.

Sincerely,

Mendocino Cannabis Alliance  
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