

From: Jackrabbit Ranch <remotesolitude@gmail.com >
To: <bos@mendocinocounty.org>
Date: 4/23/2019 7:56 AM
Subject: 4/23/2019 BOS meeting - Raising Cannabis fees instead of easing anticipated work-hours?

Hello,

My name is Heidi Wordhouse and I own Jackrabbit Ranch which has rents land to three temp-permitted regulated gardens. I am writing to alert you to either a gross over-estimation of time spent by county employees on each permit or a gross problem with management and streamlining of the county-manpower-handling of permit paperwork.

I became aware just last night that the Board of Supervisors will be reviewing a recommendation to raise inspection, submittal and other fees for Cannabis farmers. Not for all farmers, just for regulated cannabis farmers. I went to your website and downloaded the fee schedule justification - and it is ludicrous. If I ran my ranch the way this is being run, I'd be out of business in less than a month.

1) There is a proposed \$881 ANNUAL fee to hand in an application. So this means subsequent years when there are no changes costs the same as the first year intake? I assume this fee is for having someone at the front office look to see everything is present in an application, collecting the taxes over at the tax office, getting P&B clearance paper stamped then filing the paperwork. For some reason, the manager has a quarter hour on that. FOR WHAT?!! So far, it's all clerical.

The administration assistant has FOUR AND A HALF HOURS for each submission - for what?! To file the paperwork? When my farmers applications were accepted, it took the admin assistant 5 minutes to flip through the paperwork and check that it was all there. FIVE MINUTES. Another Three minutes to accept the B&P stamped paperwork and tax forms. Let's add an hour on for filing (even though filing a bunch of papers should really take less than 5 minutes.) We're still missing 3 hours of paid work somewhere.

The Inspector meeting was an hour - but here a cannabis farmer is being charged 10.5 hours for inspector time? FOR WHAT? It's not for inspecting the actual garden - that's another fee later on, with an additional hourly fee listed as well, on top of the inspection fee. What's this inspector do, exactly, for 10.5 hours when the application is handed in? What's to inspect on the paperwork? Reviewing a map? That takes less than an hour.

2) Annual Permit and Inspection fee: proposed \$738. Not only has the farmer paid the county \$881 to accept the paperwork, but now they're paying \$738 for someone to look at the permit and look at the farm. Inspector time is pegged at seven hours. It takes an hour and a half to reach my property and the three rental gardens on it. That's three hours of traveling time plus one hour of actual inspection (timed from the last inspection here). For three gardens, that's six hours total inspector time. Say, an hour each garden to review the permit and we're up to nine hours for THREE gardens, or Three hours per garden. Yet, the farmers are being billed for seven hours of inspector time. WHY? Then the farmers are being billed for three hours of the cannabis manager's time. WHY? What does the cannabis manager DO for three hours on each inspection? He doesn't go along on the inspections, doesn't prep them that we know and the farmers certainly don't see his benefit during their inspections.

This over-estimation of time required for each task is obvious and obtrusive and completely uncalled for. Require your county employees to find a faster and less onerous way to streamline their protocols so they use fewer hours with fewer employees involved. Your cannabis department head is making six figures. That's well more than any regulated farmer who's paperwork he's responsible for checking. Require he earn those six figures by streamlining and removing unnecessary busy work from his department before raising fees for un-necessary work on the people who can least afford them.

I'll tell you this. The Cannabis Department's inflated hours are just one more reason farms will fold back into the untaxed, unregulated market instead of staying in the light.

Get some accountability into the Cannabis dept's charge-hours if you want to meet expenses. Streamline it. Even I, a small rancher could do it better.

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