

Dear Board of Supervisors,

I submit these comments on Agenda Item 4f in regard to Phase I of the Cannabis Permitting Program and the Portal Application submittal process. As you know the Phase I permit program has been fraught with difficulties. Please be aware that the Portal Application process has also been equally difficult for applicants. The process included fatal flaws in the request for information that didn't clearly spell out certain items that were required, the ability to make corrections to uploaded documents, and the ability to supply all documents – that is sub-document requests that had no option for upload. Therefore, submitting a complete application was virtually impossible.

Next the response to applicants' submissions was delivered with a tone that was received as scary, intimidating, and entirely defeating. At this point – nearly 5 years into the program – I beg you to support the applicants in Phase I - these are your constituents and neighbors; they are legacy growers that have contributed massively to the County's tax proceeds through this process, and their legal businesses represent a significant percentage of the County's economy. Phase 1 applicants have spent years working on their permit materials, they have remediated properties, complied with environmental requirements, obtained countless building permits, paid tens of thousands of dollars in local taxes, and have corporate structures, active businesses, and State licenses in place.

The State of California has continued to move the goal posts on provisional licenses to adapt the State licensing program to meet real world conditions and make the State licensing program work for legacy/provisional applicants. The Board of Supervisors and the Mendocino County Cannabis Program can certainly do the same. The responsible agencies, the State, CDFW, local environmental groups and the community at large support the efforts of Phase I applicants to make it through this process to full permits. Will the Cannabis Program and the Board of Supervisors please do the same – that is please support existing Phase I applicants through to a full permit.

Applicants for State cannabis licenses are afforded a flexible and lengthy deficiency process that allows for the correction of errors and resubmission of documents for license applications. It is unacceptable that the local permit program has decided that applicants will have one chance to get it right. A "one strike policy" for Portal application submissions is entirely inconsistent with real world applications and simply does not work to serve this community.

If the Board of Supervisors does not support your constituents and the legacy growers that have stuck their necks out and committed to this process, who is being supported, by default it is the illegal market and cartel grows that are proliferating and destroying the environment and the safety of the community.

Thank you for the opportunity to submit these comments. Please support all Phase I applicants through to full permits.

Sincerely,

Josh Abrams