



September 13th 2021

Re: BOS meeting 9-14-2021 Agenda Item 5i

Dear Honorable Supervisors,

The Covelo Cannabis Advocacy Group (CCAG) met with the Cannabis Program Manager several months ago to discuss the legislative platform for 2021/2022.

We would like to express great desire to see lobbying efforts for California Building Code reform as it relates to processing for the cannabis industry. As it currently stands, cultivators wishing to process their own cannabis onsite must obtain an F1-Occupancy for the structure, which would include ADA compliant infrastructure, parking lot etc. This policy does not make any sense for cottage industry cultivators that have zero employees.

The State needs to hear from Mendocino County about the importance of creating a new Building Code section for cannabis processing. The term "processing" in the eyes of most emerald triangle operators is the use of hand scissors (typically fiskars or chikamasa tools), a trim tray to collect trimmings and a bucket/storage container to place finished trimmed material. In addition, a table, comfortable chair and lamp is all that is needed to conduct this processing activity. If a seamstress wants to cut fabric and sew garments on a sewing machine in their home and sell clothing online, they do not need to obtain an F1 occupancy structure. Cutting and serging fabric, using an iron and sewing clothing seems far more dangerous than trimming flowers in a room.

CCAG has been advocating for over 4 years to see legislative reform at both the local and State level. We urge the BOS to please prioritize this item in the upcoming legislative platform. It's a huge stopping block for many operators that would like to process their own cannabis material onsite in small structures. By not having flexibility with this building code regulation, it forces cultivators to outsource processing activities which is a large expense that some cottage and specialty cottage operators are unable to afford.

We are providing an image of what hand trimming looks like for context:



Thank you for the consideration of this important recommendation.

Respectfully,

*Monique Ramirez*

Monique Ramirez  
For the Covelo Cannabis Advocacy Group