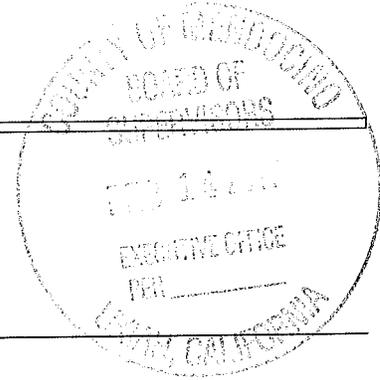


**Kristan Ramos - Letter about Cannabis Recommendations**

**From:** "Casey O'Neill" <casey@cagrowers.org>  
**To:** <bos@co.mendocino.ca.us>  
**Date:** 2/14/2017 8:33 AM  
**Subject:** Letter about Cannabis Recommendations



**To: Mendocino County Board of Supervisors**

**From: Casey O'Neill, Local Farmer, Vice-Chair California Growers Association**

This process has been extremely complicated and filled with many details and difficult issues to resolve. We appreciate the amount of time dedicated to this process by the Board and County Staff. As this process evolves, we would urge that maximum flexibility be included in the program wherever possible.

The following are points that we would like to offer for consideration:

**Leases:** The coalition letter from the Feb 7th meeting recommended that the limit on leasing to two parcels apply only to Phase 3. We felt it was important to provide opportunity for relocation to the many cultivators who may need new location sites. There has been much concern about the limited ability of relocation sites given the removal of TPZ, FL and Rangeland for new cultivation sites.

**Rangeland Transfer:** It would make sense to allow for relocation to rangeland parcels with existing sites on them, as the impacts have already occurred. If cultivators go through the process of permitting their rangeland sites, they ought to have the ability to later sell to another cultivator should they so desire, especially come 2020 with "New" cultivators.

**Previous Cultivation:** Given the goal of bringing as many cultivators into the program as possible, it would make sense to not penalize cultivators who had grown over the 25 plant limit in the past. Also, how do indoor cultivators prove prior cultivation without Google Earth?

**Residential Cultivation/Sunset Provisions:** We support a streamlined Administrative Permit process that would create a rapid process for enabling neighborhood cultivators to demonstrate that their cultivation site was not problematic with the neighbors. This would go a long way towards avoiding unnecessary enforcement of cultivators who would like to participate in the program in neighborhoods where cultivation is an accepted norm. We would like to suggest the eligibility for setback waivers to be included in this neighborhood process.

The proposed timelines do not provide the opportunity for cultivators to get the zoning overlay established. A provisional license or letter of intent process that would enable small parcel cultivators to continue cultivating while working on the zoning overlay would be helpful.

The 2 year sunset language seems contradictory to the “no cultivation is allowed on parcels smaller than 2 acres”. This was a huge part of our advocacy over the last two years and we hope that we will not see small parcel cultivators in accepting neighborhoods wiped out. Provisional transition paperwork would be extremely helpful.

**Prop 64 Memo/25 Plant Medical Cultivation:** There are a great many medical cultivators who make medicine that requires a tremendous amount of plant material. Maintaining the current “25 plant rule” for personal medicinal cannabis and a separate designation for Prop 64 legal recreational cultivation would make a great deal of sense.

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