

From: "Casey O'Neill" <casey@cagrowers.org>
To: <bos@mendocinocounty.org>
Date: 2/25/2019 6:42 PM
Subject: Comments for Board of Supervisors Meeting, Tuesday, February 26th, 2019

TO: Mendocino County Board of Supervisors
FROM: Mendocino County Alliance

Comments for Board of Supervisors Meeting, Tuesday, February 26th, 2019

We appreciate the opportunity to offer comments, and would also like to offer as a point of information the fact that the Mendocino Cannabis Industry Association and the Mendocino County Growers Association are in the process of completing a merger to form one group called the Mendocino County Alliance (MCA). The goal is to minimize duplicative efforts and be able to operate more effectively and with lower costs. Comments today are submitted via the Policy Committee for MCA.

GMO Moratorium: We support the concept of a moratorium for GMO cannabis production and all other forms of GMO.

Hemp Moratorium: We believe that there is a strong need for a robust conversation around hemp and hope that county government can help to foster this conversation.

SB67: We appreciate the county offering a support letter for this legislative vehicle. We would like to reference support for the suggestions made by Hannah Nelson in regards to potential issues with the legislation.

- We support an additional language that would allow small cultivators to switch styles and sizes without having a new annual application head to the back of the line. Please see Hannah Nelson's letter to the State Legislators for more info.
- There are a number of cultivators who had expired temps but submitted annuals after the expiration of their temp (i.e. they did not cultivate last year and so they let the temp lapse but then completed an annual.) Applicants who once had a temp are eligible for Provisionals under the law, but we would like to see their temps revived and extended if possible. Perhaps language like: "If the annual was submitted prior to the passage of this legislation OR prior to the expiration of a current temp license". Some of the situations that exist are as follows:
- Temp Expired before annual was submitted because cultivator was not cultivating.
- Old Temp Expired before annual was submitted because applicant thought new temp would be issued because CDFA made folks apply for new temps for all kinds of things (error in picking from drop down menu for size or style, change from indiv to entity, etc.). The initial temp expired and a new temp might not have been processed in time for Dec 1st cutoff either because CDFA messed up or because the application made it in too late.
- Temp expired after submission of annual app because CDFA required new annual for a change and no one knew it would take so long to process annual apps into provisionals and the new annual app went to back of line.
- Temp expired after submission of annual app for any reason during this period where CDFA was determining how to handle the potential gap.
- No temp was processed by CDFA before 12/31/18 (there are 200 statewide that were not processed by CDFA even though they were submitted prior to 12/1/18)

Thank you for the opportunity to submit comments!

--

Casey O'Neill, HappyDay Farms,
Vice Chair California Growers Association
Cell: 707-354-1546 Casey@cagrowers.org
<http://www.calgrowersassociation.org/>