



Cannabis Enforcement Plan

Board Direction from 4/12/21

Directs Code Enforcement, Cannabis Program, and County Counsel, with input from Sheriff, to return with an enforcement plan aligned with Humboldt's model.

Humboldt County Model of Enforcement Core Features

Deterrent Penalties
and Tools

Interagency
Collaboration

Proactive

Long Term
Strategic Plan

Resourced
Appropriately

Core Feature : Proactive

PRIOR BOARD DIRECTION (BOS Direction 2017 to present*)

***This is currently how we operate**

- Complaint driven
- Code Enforcement managed complaint hub (Including cannabis complaint hotline and web complaint portal)
- Cannabis Department monitors in-program site performance via site inspection

STAFF RECOMMENDATIONS TO IMPLEMENT NEW BOARD DIRECTION

- Add collaborative directed enforcement aided by satellite imagery
- Maintain current complaint hub
- Cannabis Department utilize satellite imagery for verification and complaint response of in-program cultivation sites to supplement site inspections

Core Feature: Interagency Collaboration

Code Enforcement

Manages the communication hub, sends referrals to other agencies, select and engage proactive targets, while continuing to respond to complaints

Sheriff's Department (COMMET)

Monitors hub for criminal and drug trafficking organization locations and people, criminally abates cannabis cultivation sites that are not responsive or not safe for regulatory enforcement staff

CENTRAL COMMUNICATION HUB

**Intake, Analysis, and
Distribution**

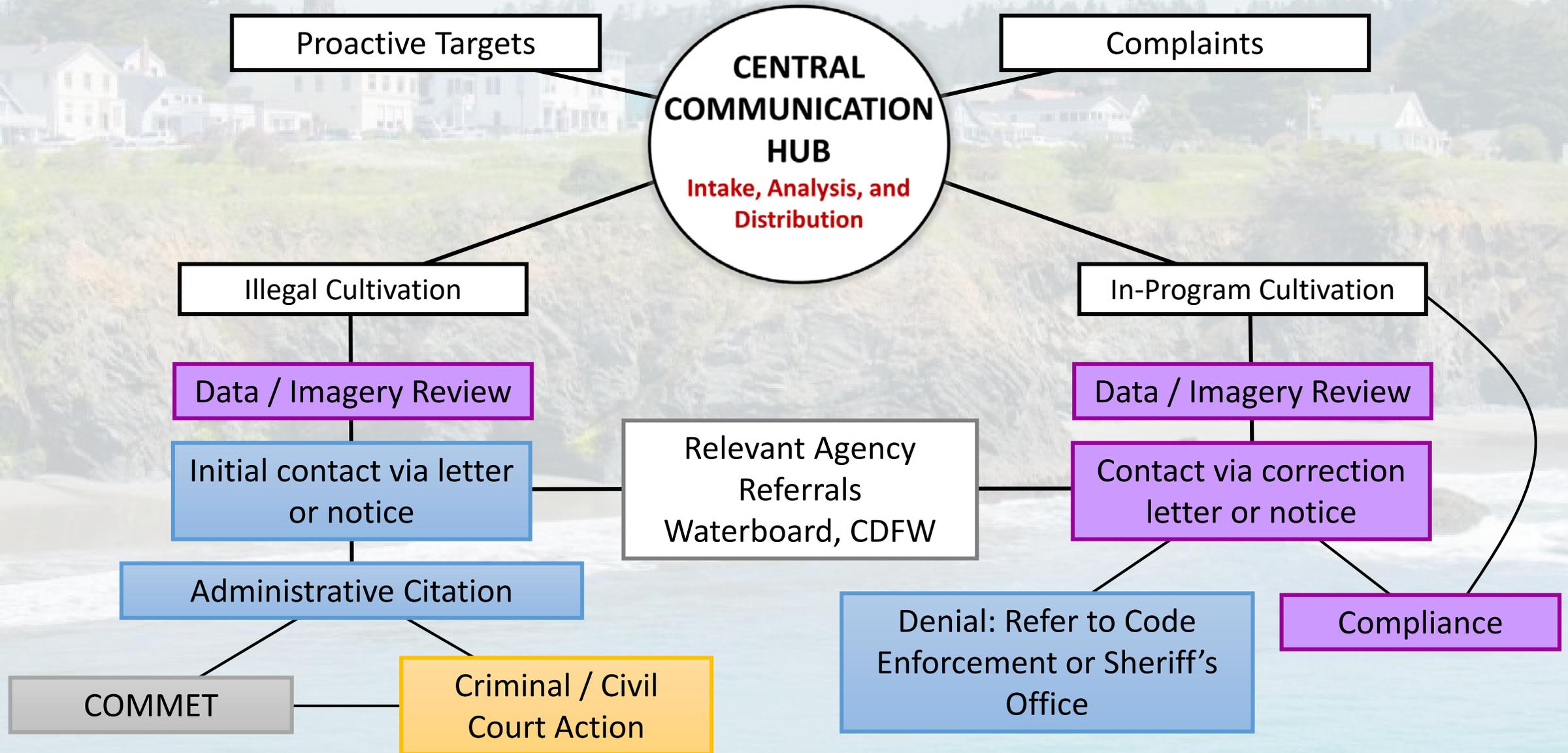
Cannabis Department

Manage satellite imagery subscriptions, work in coordination with Sheriff's Office and Code Enforcement for use of the imagery technology

Cannabis Department

Assess complaints of permitted cultivation sites, verification of in-program sites, and refer denied sites to Code Enforcement and Law Enforcement

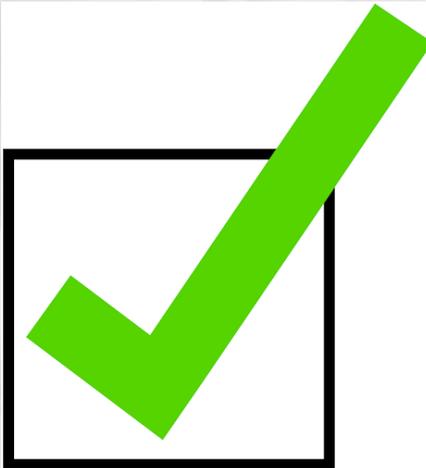
Core Feature: Interagency Collaboration



Core Feature: Deterrent Penalties

ORDINANCE No. 4480

Adopted 1/5/21



AN ORDINANCE AMENDING MENDOCINO COUNTY CODE CHAPTERS 1.04, 1.08 AND 16.30 RELATING TO CODE ENFORCEMENT PROCEDURES AND REGULATIONS, INCLUDING ADMINISTRATIVE PENALTY INCREASES RELATING TO STORMWATER, CANNABIS AND BUILDING VIOLATIONS

Core Features: Deterrent Tools

CURRENT TOOLS

Notice of Violation

Administrative Citation

Property Liens

Abatement Orders

Civil Court Actions

Penalty collections

PROPOSED ADDITIONAL TOOLS

Tax assessment on illegal cannabis
infrastructure

Satellite imagery for evidence collection

Core Feature: Long Term Strategic Plan

- STAGE ONE** – Establish the strategic plan, create the structure, allocate resources, change code as needed, begin recruitment and hiring, initial contact letters for voluntary compliance, begin engaging the highest profile illegal cultivation site targets with the greatest **criminal element** using the existing resources.
- STAGE TWO** – Train new personnel, begin regular status reporting, include proactive targets in initial intake, begin engaging the highest profile illegal cultivation site targets with the greatest impact to the **environment** using the existing resources.
- STAGE THREE** – Prioritize pro-active targets as vacancies are being filled with newly trained personnel, begin engaging the highest profile illegal cultivation site targets with the greatest impact to the **community quality of life**.
- STAGE FOUR** – Target remaining sites based on; Largest Scale, Environmental impact, and individual people or groups who own multiple illegal cultivation locations.
- STAGE FIVE** – Take inventory of plan success and adjust resources and direction accordingly

Core Feature: Resource Appropriately

Code Enforcement

Cannabis Department

Sheriff's Office

**Cannabis
Enforcement
Ecosystem**

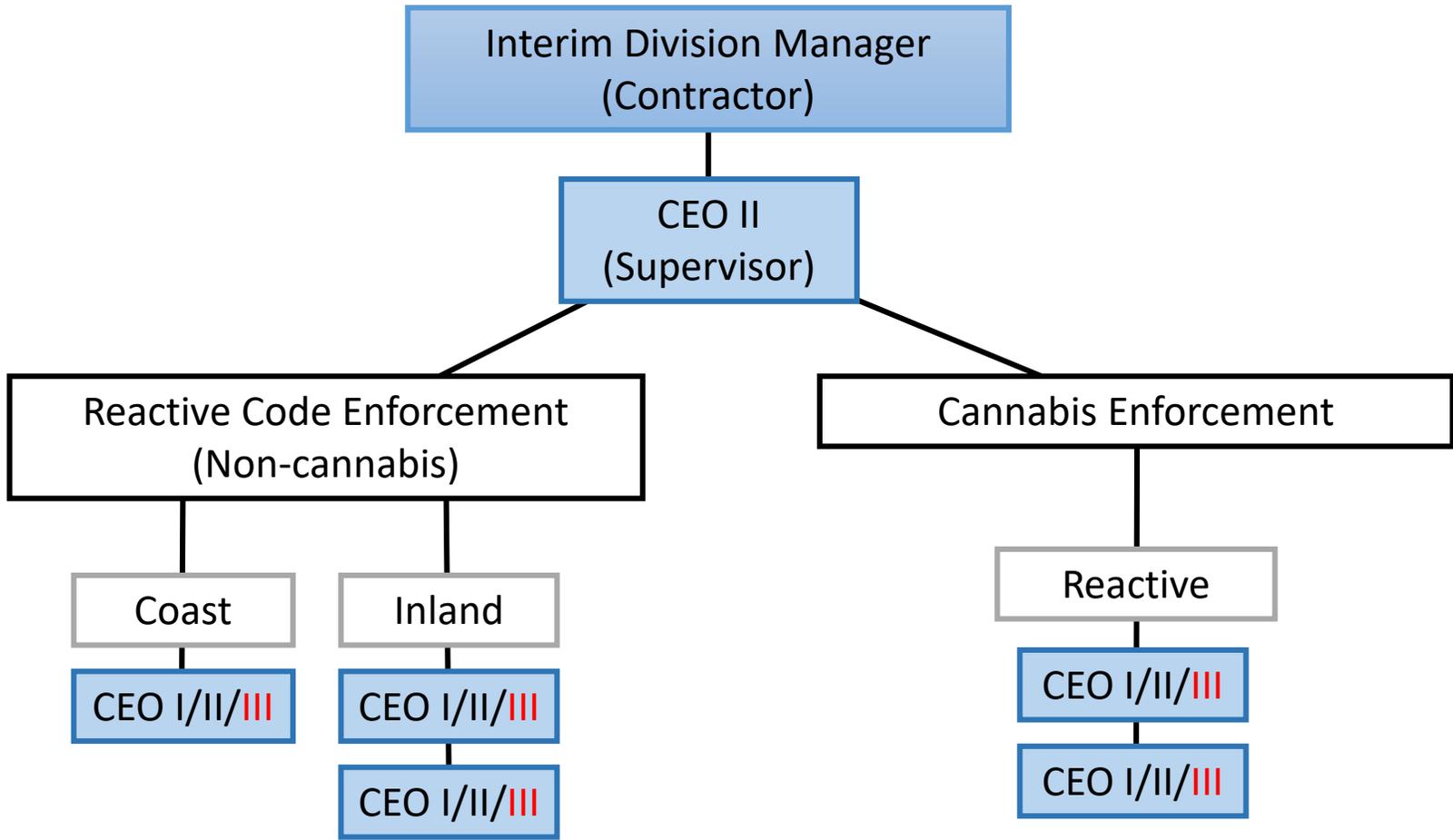
County Counsel

Tax Collector

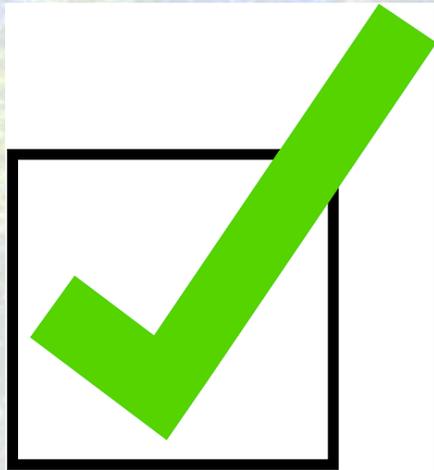
Assessor

Supporting Agencies

Current PBS Code Enforcement Structure



CEO = Code Enforcement Officer

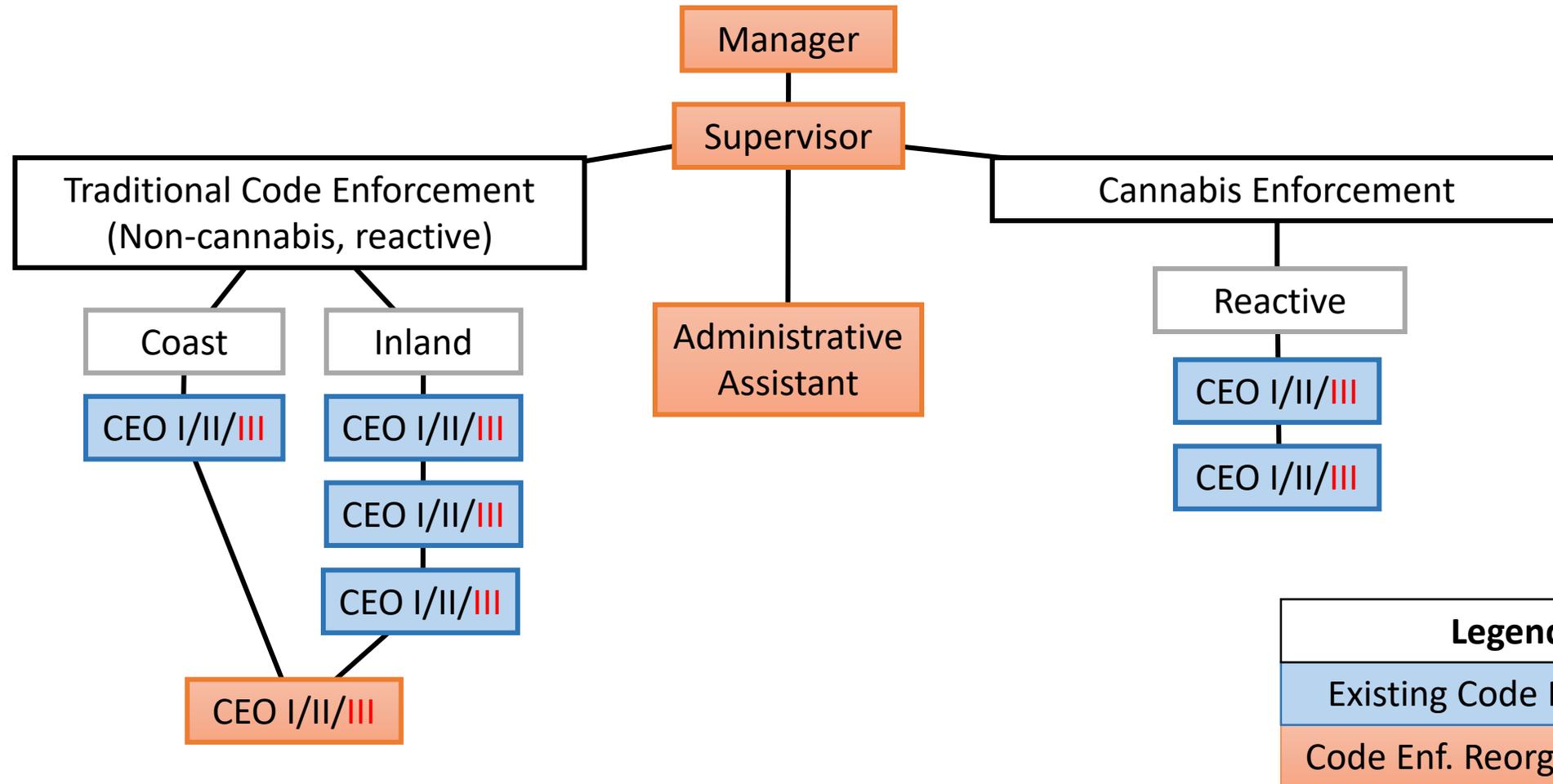


Board of Supervisors Direction 9/22/20

Study Code Enforcement staffing and resources to develop a reorganization plan to present to the Board. This plan will set a strategy to adequately respond to increasing community complaints, calls for service, illegal cannabis operations and Health Order violations, including satellite imagery as an enforcement tool. Existing Ordinances to be amended allowing increased administrative fines for environmental, cannabis and other egregious violations so that fines have a meaningful deterrent to violations of County Ordinances and recovery of costs are more commensurate to time spent on investigation efforts. *(Board Directive from BOS 5/5/2020, 12/16/2019, 10/1/2019)*

Board of Supervisors Direction 9/22/20

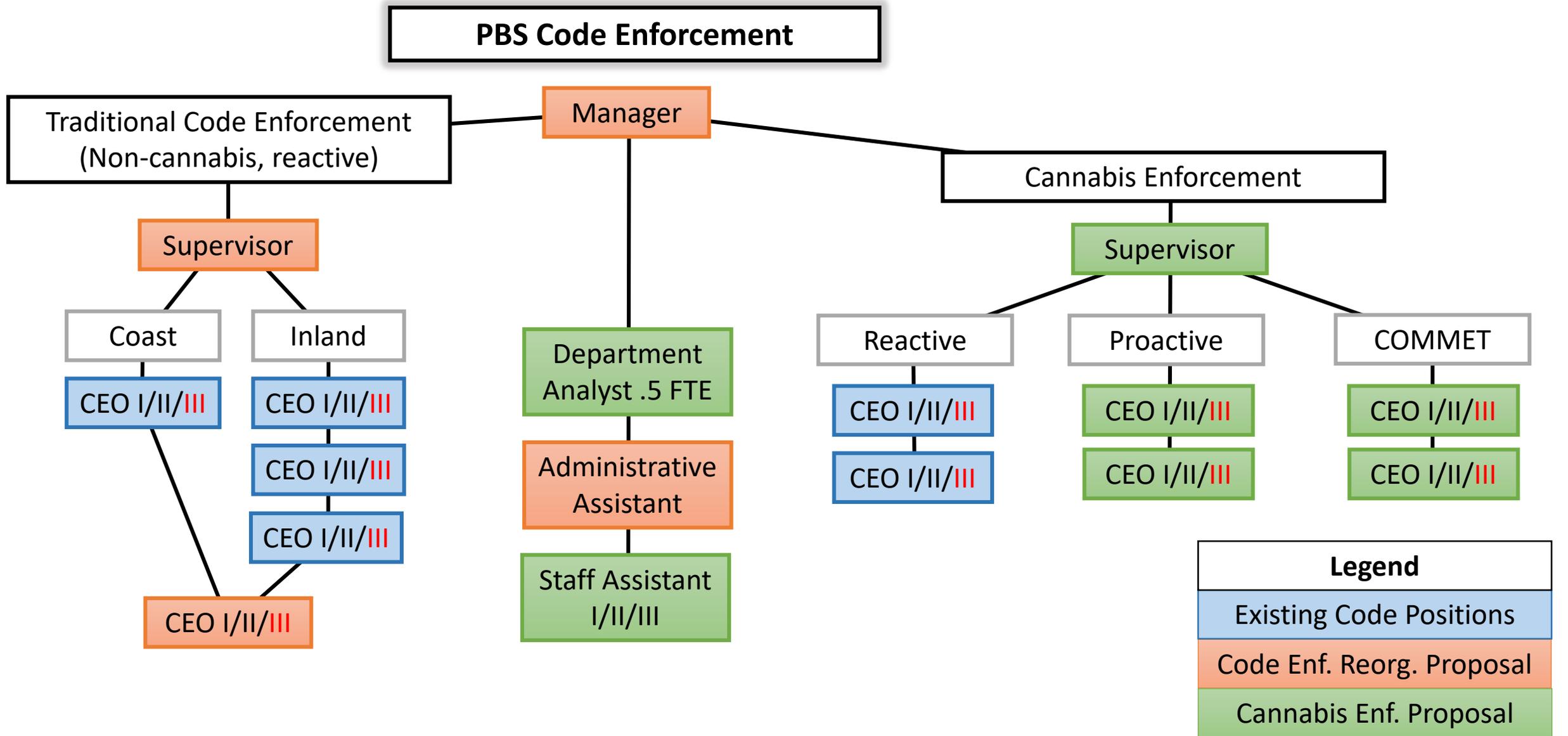
PBS Code Enforcement Reorganization



Legend
Existing Code Positions
Code Enf. Reorg. Proposal

III - Not currently under development

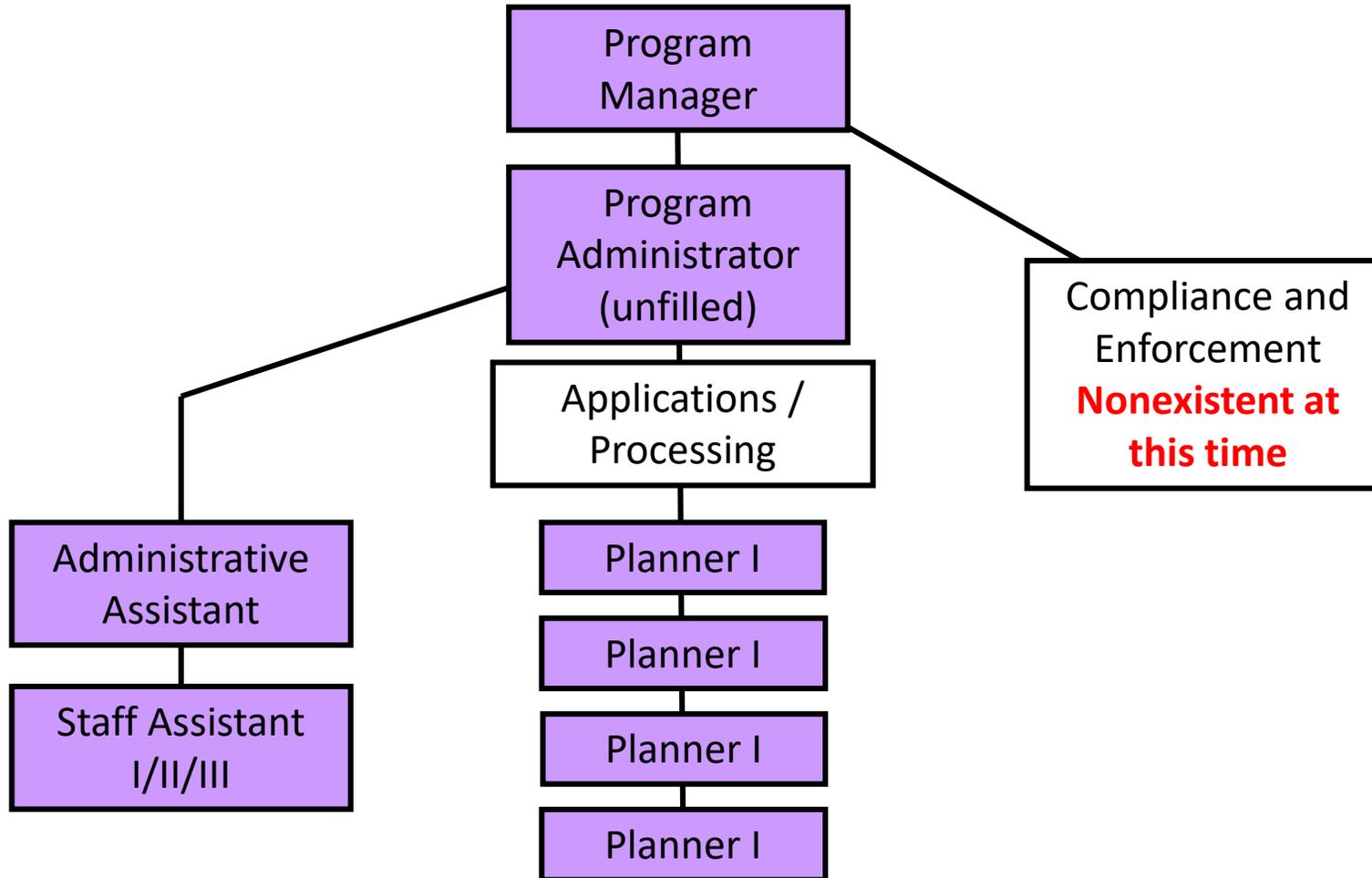
Reorganization AND Cannabis Enforcement Staff Proposal



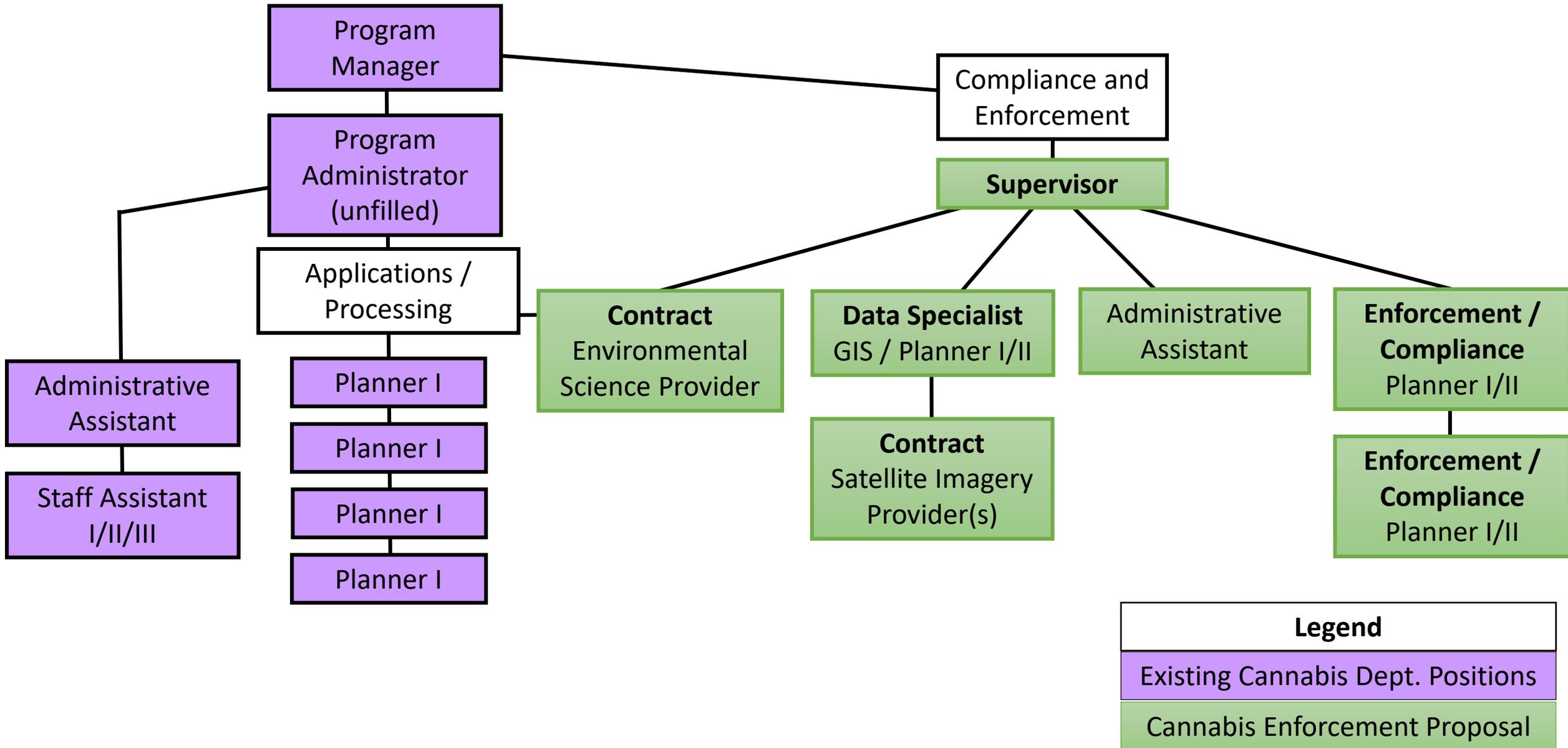
Legend
Existing Code Positions
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Cannabis Enf. Proposal

III - Not currently under development

Current Cannabis Department Structure

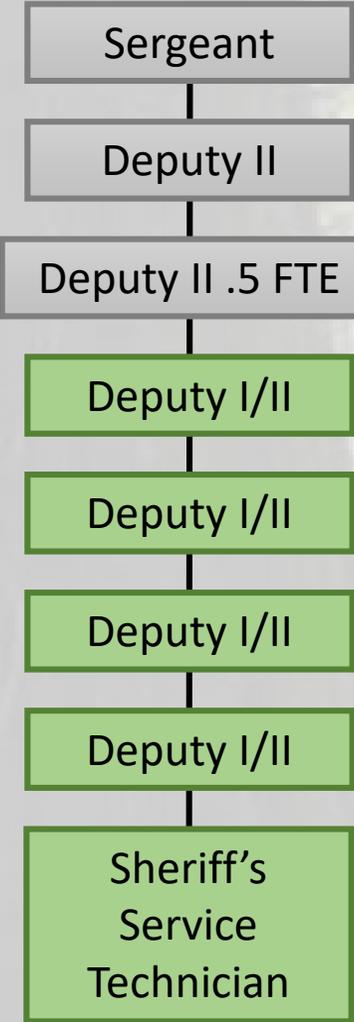


Cannabis Department Staff Proposal





Sheriff's Office COMMET Structure



Contract
Environmental Science Provider*

*Environmental Science Provider to create environmental reports for criminal investigations to aid in prosecution of egregious environmental violations.

Legend
Existing Sheriff's Positions
Cannabis Enforcement Proposal

County Counsel: Assigned to Code Enforcement

Deputy County
Counsel

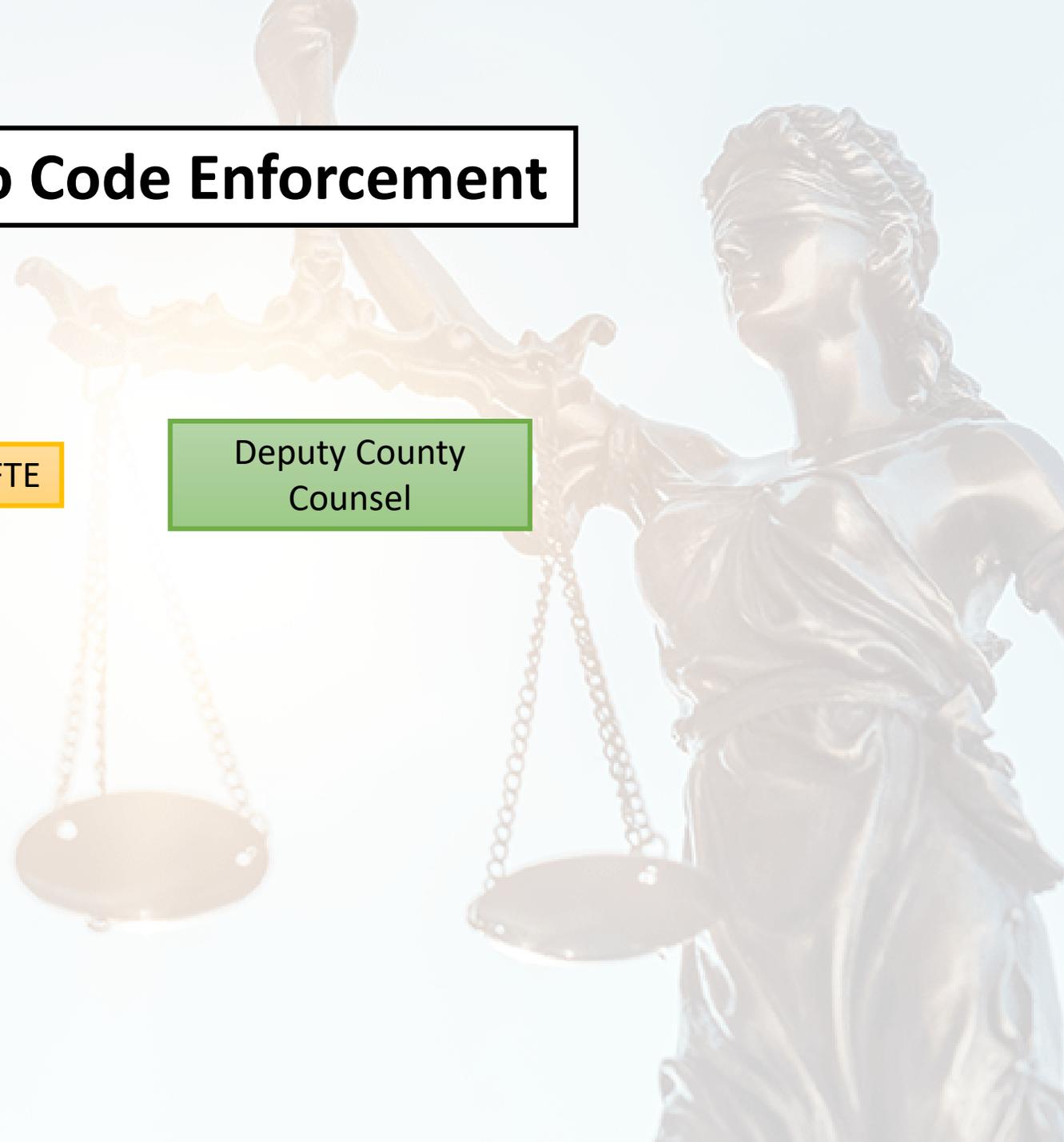
Staff Assistant .5 FTE

Deputy County
Counsel

Legend

Existing Positions

Cannabis Enforcement Proposal



Proposed Resources

PBS Code Enforcement

REORGANIZATION

Manager

Supervisor

Administrative
Assistant

CEO I/II/III

ENFORCEMENT PROPOSAL

Supervisor

CEO I/II/III – x 4

Department
Analyst .5 FTE

Staff Assistant
I/II/III

Cannabis Department

Supervisor

GIS Planner I/II

Planner I/II x 2

Contracts

Contract
Satellite Imagery Provider(s)

Contract
Environmental Science Provider

Sheriff's Office COMMET

Deputy I/II – x 4

Sheriff's Service Technician

County Counsel

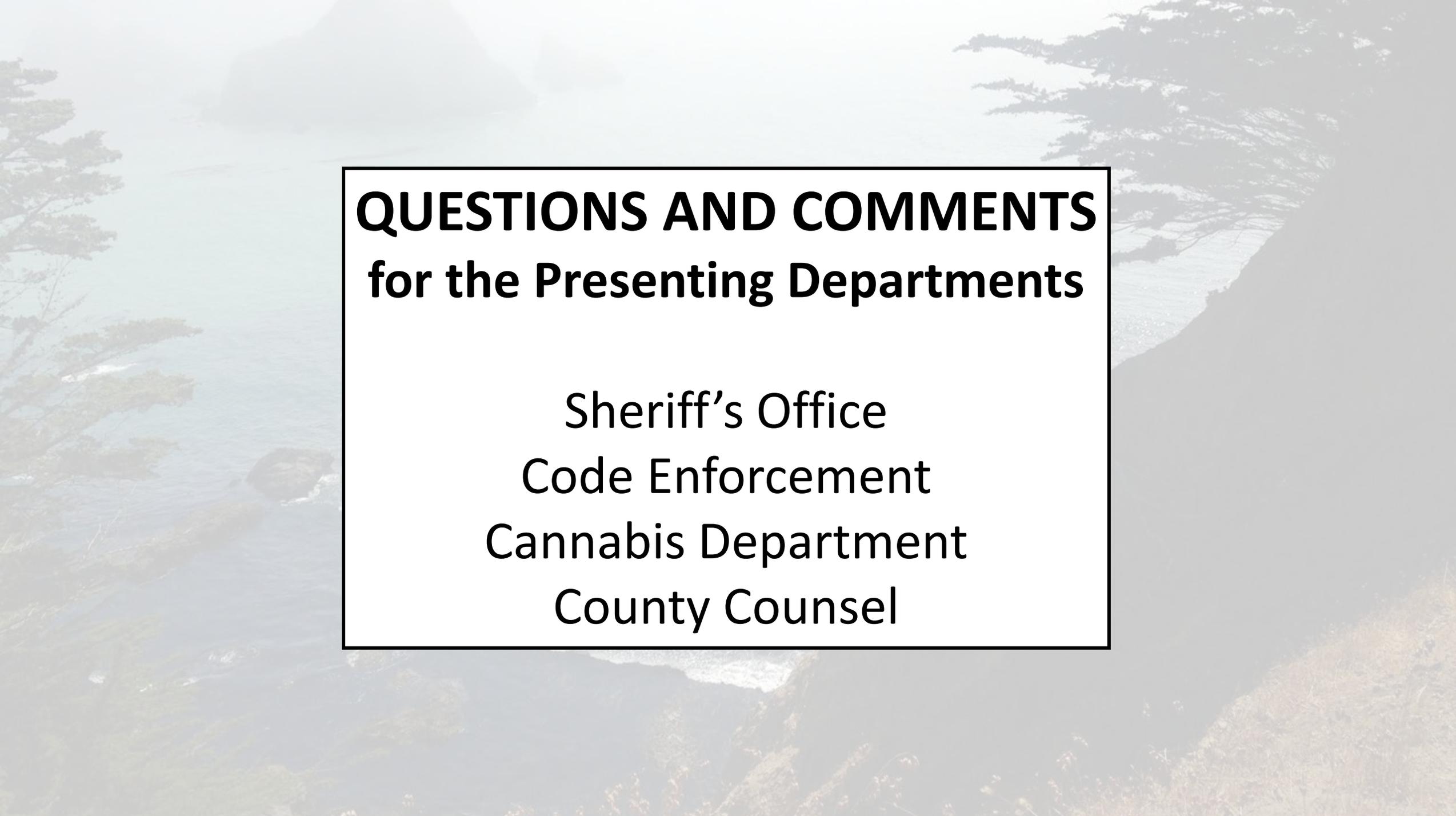
Deputy County
Counsel

Legend

Code Enf. Reorg. Proposal

Cannabis Enforcement Proposal

III - Not currently under development



**QUESTIONS AND COMMENTS
for the Presenting Departments**

Sheriff's Office
Code Enforcement
Cannabis Department
County Counsel