

From: Steven Amato <stevenamato@gmail.com>

To: <bos@mendocinocounty.org>

Date: 8/21/2017 2:41 PM

Subject: Cannabis Ordinance

Dear Supervisors,

I am a cultivator in the application process for the 10k square foot mixed-light application. I am a part of some social media groups and have seen some of the letters going around that are being sent to you. While I agree with some of their points there are some that as a cultivator I do not agree with and would like to express my ideas on those concepts:

1. I disagree with the formation of the Cannabis Advisory Group. While in theory this sounds like a logical idea, I see it as a source of corruption, control, and an oligopoly. I believe after the last few years of experience you have become the best authority on this subject for the county as a WHOLE. You listen and understand both sides' desires and wants. You have been very accepting and understanding to make changes that create a better ordinance. I fear this advisory group would be stacked with individuals that have special interest for policy to be formulated in a fashion that supports their needs and not those of the whole community (some of which I will discuss in detail on some other points below). These stakeholder groups have failed us growers in my opinion in many ways and have taken a lot of money from dues and fees from growers like myself by making promises and claiming services they have not provided. Now some of the individuals from the stakeholder groups are looking to be on this committee they are proposing and I only see more of the same happening at a more official level. Please consider this greatly before approving such a committee. If a committee were to be formed I ask that they have official credentials and possibly government experience at the very least, but still fear they will be bought and lobbied.
2. Streamlining of the cottage program- I see the need for cottage program, but do not see why they should have any sort of advantage, and I am highly against allowing them any exemptions if they are contracted with an official "processor and distributor." I will not mention exact names but I believe we are all aware of who this "processing center" is. I consider myself the blue collar cultivator, I have come from a poor family that was on welfare growing up and achieved a scholarship to pay for my degree and worked hard my whole life in a variety of non Cannabis related business to save the money I have to start this business venture and pursue my dream of owning my slice of heaven here in Mendocino County. I believe in working with the Board of Supervisors to create a fair and fertile cannabis ordinance, but I no way believe my financial destiny is your responsibility. The cannabis marketplace will dictate who will make it and who will not, and people thinking they can take or be given short-cuts will help them, are in for a reality check, in fact it will do the complete opposite. If cultivators want to compete and create a successful business model they will need to grow-up and accept the responsibility and begin acting like a professional organization. If they cannot, then owning their own business is not for them and they should start applying for jobs. If I have to and do go through all steps, why should they be allowed a short cut? What I really fear is that they will all be at the mercy of a distributor/processor who will dictate price to them and make it more difficult for me to compete against with price wise. Creating a system based upon this magical distributor/processing savior is very dangerous because when they fall flat on their face it will devastate all of these micro-farms that are 100% reliant upon them. Which has happened to a degree already.
3. ADA requirements- There is an argument being put forward that if there is a single owner operator business or less than 5 employees they should be exempt from the ADA commercial requirements. This is ridiculous. Any economical policy should encourage job growth not try to make people limit it. There are going to be a lot of ex-growers and workers in need of jobs in these upcoming years. Besides the idea of limiting employment numbers, many people lie and will be paying people off the books which is a practice this county needs to move away from not encourage. I do believe there should be a fair amount of time given to cultivators to install these requirements with an extension system if they are complying and actually moving ahead with the necessary improvements. I have owned multiple businesses in different states and had to abide by these same regulations even when I only had three workers at times.
4. Hoop Houses- Hoop houses should basically be done away with. They are rarely constructed properly and dangerous when the wind picks them up and can blow them onto roads or other people's properties. I understand why people want to do them, but it is not a professional way to cultivate. If they cannot afford a greenhouse than they can grow full-term outside. I cannot cook food in my home kitchen and sell it in the Walmart parking lot legally, I would need to have a proper food handling facility.
5. I believe there should be a "conditional permit" granted if an application has satisfied the majority of the conditions and is just awaiting for some third party document.
6. Range Land zoning should be reconsidered. I am Range Land and will be able to obtain a permit because I have done the necessary steps, but believe the zoning was too harshly considered for future permits. I personally believe AG land should be used for food production, TPZ for timber, and Rangeland may be the best zoning for cannabis cultivation.

Although I enjoyed a good steak in my day, I have stopped eating beef because I believe cattle ranching is one of the most harmful practices environmentally. I would gladly go into further detail on that subject, but know that you are most likely aware of the subject. Range Land is away from neighborhoods (a lot of times, not always), up in the mountains, and the soil is often destroyed from years of cattle grazing on it. Most cannabis cultivators do not use indigenous soil. As I have said, I am fine for my situation, but for the future I believe this deserves so reconsidering.

Those are some of my thoughts on some of the issues circling around. I thank you for all the great work you have done, but most importantly for keeping open minds to changing the ordinance for the better. I am tired of people in this county putting blame on their financial success upon your ordinance, it is immature and just an excuse. I do ask that when you hear certain groups asking for certain items and changes, please try to read between the lines and see what it is they are trying to achieve for themselves and not the county as a whole. They all claim they are asking things for the greater good of the county the love, but how many other Board of Supervisor meetings do they attend on all the other outstanding issues in the county like homelessness or the need for a mental health facility? I believe it may be tough love, but having conditions that create professional cultivators will help all those in the long run have financial success. If exception after exception is made that will just encourage nonprofessional practices and they will never make it or obtain a state license.

Thank you for your time.

Sincerely,

Steven Amato Jr.
Hopland 5th District