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To: <bos@mendocinocounty.org>
Date: 8/22/2017 6:29 AM
Subject: Comments on Possible Cannabis Amendments 8/22

Honorable Board of Supervisors

Thank you for your efforts to create an ordinance that works for all stakeholders, particularly as we are about to amend the MCCR. I'm a cannabis industry consultant for many farmers and have been cultivating in Mendocino County for 8 years. Many of us are trying to do whatever we can to give longtime cultivators here a fighting chance as the state transitions to a regulated industry.

Many businesses will not survive this transition, and the economic impacts to individuals, families, communities, and the county as a whole, might be devastating. Between state regulations, license fees, taxes, and competition from well capitalized outsiders throughout the state, the mom-and-pop operations that have found a home in Mendocino County over the years are extremely disadvantaged. We have to be realistic about where this industry is going in the future. In 2023 the state will begin granting unlimited scale cultivation permits. That means 1000s of acres of production for a single licensee. That means Big Ag might probably destroy the cottage industry. And here in Mendocino - with a max of ~1/4 acre of cultivation per parcel and a max of 2 permits per person - every cultivator in this county is a cottage cultivator. I recommend to my clients and friends that, if they haven't already started, they better focus on developing their own varieties and be ready to transition away from cultivation and toward seed and strain production within the next 5 years if they want to stay in Mendocino County and make a living.

My point is that all of us who care about the socio-economic impact of this transition period need to do whatever we can to accommodate the practical, real world, on-the-ground needs of the Phase 1 growers who can prove they've been here since 2015 or earlier and didn't just show up for the most recent Green Rush. Most importantly, we need to create opportunities for them to be able to stay here in Mendocino County and have more than just a fighting chance at success. Phase 1 growers need the county to support them and this ordinance is the primary mechanism by which the county can help make or break the industry.

I absolutely don't mean to suggest that I believe anyone wants to break this industry. I know that's not the case. However, we need to realize that it's on thin ice no matter what we do, and we have to look at the unintended consequences of each detail within the ordinance.

There was extensive public comment submitted two weeks ago, all of it important, and only a small fraction of it was addressed in the Board's direction to staff. This is not the path to an ordinance that gives us the best opportunity to compete with the rest of the state.

I urge you to consider ALL of the public input, especially by community leaders like Casey O'Neill, Hannah Nelson, Ron Edwards, and everyone else who is going out of their way to be a part of this democratic process and trying to help make important and necessary changes happen - regardless of whether it affects them directly or not. We're working hard on behalf of the community and the future success of the industry.

Specifically, there are 3 issues that I will be addressing in detailed letters to the Board for Tuesday's meeting. I will just review them here in brief for your consideration:

- 1. I strongly suggest that we form a Cannabis Advisory Group in our county.** The cultivators are concerned for their future and they need to know that there is a solid team of specialists in their corner working with the county to make the system work fairly for all stakeholders. This process needs to be ongoing and I don't think it's enough to have conference calls with the cannabis manager. It would go a long way to increase participation and faith in the program if an Advisory Group is formed.
- 2. It should not be possible for one person to extinguish another person's claim to proof of prior cultivation through the relocation and extinguish process.** It's simply not fair. If more than one person was cultivating on a parcel before 2016, they should have equal opportunity to relocate or continue cultivating through the sunset period. I know of multiple situations where former partners are threatening to sue each other because one of them filed the relocation paperwork first and the other one has no other means to defend their livelihood.
- 3. The Rangeland Zoning District should not be excluded from Phase 3 and people should be able to relocate to parcels in the Rangeland Zoning district regardless of whether there is an existing cultivation site.** RL was included in the CEQA initial study and then later removed. In fact, RL made up over 80% of the available acres for New Cultivation and over 40% of the available parcels in the county. Why was it removed? These parcels are some of the most ideal in the county. They are generally large, out of sight, with open areas for cultivation sites. They often have many acres of vineyard cultivation already established. And the ban on tree removal already protects these parcels from the cutting of oaks or timber species. I don't understand the logic in limiting Rangeland after the CEQA initial study included it and it made up such a large percentage of the available parcels/acreage.

I deeply appreciate you taking the time to hear me out and consider what myself and others have to say.

Sincerely and with hope for the future,

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