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**Date:** 8/21/2017 10:27 PM  
**Subject:** Public Comment for BOS Meeting August 22, 2017  
**Attachments:** HNMemo20Aug17.docx

Dear Honorable Board Members:

I would like to express my support for all of the points that Hannah Nelson makes in her letter to Supervisor Hamburg dated 8/20/17. Every issue raised by Ms. Nelson is truly important in order to get more cultivators INTO the program.

One of the issues that I see as particularly important that she brings up are the transferability of permits. Property owners must be able to use their years of work and investment in their properties to be able to move or retire and be able gain full value for their properties because it is a business enterprise. Transferring a current grow to another person or entity does not increase the number of grows in the county, but only limits one's "retirement" capabilities because they cannot transfer the current use of their property. The permit is a valuable asset that individuals have worked very hard with great risk to obtain and should be able to be transferred in order for aging cultivators or those wishing to leave the area to be able to capitalize on their years of efforts.

Also, I highly urge the BOS to follow Hannah's recommendations in regards to the many Building Permit Issues. It is important that cultivators be given a proper amount of time to bring their existing buildings into compliance without going broke while also working through the many other uncertainties of the permitting process as well as the changing cannabis industry.

An appeal process is very important as well as a citizen's advisory council that will continue to amend the ordinance in a way that is streamlined and allows proper attention to be given to the many many issues of the current ordinance that will need to be revisited in order to make this ordinance practical and workable for the citizens of this county.

Lastly, I would like to comment on the Mitigated Negative Declaration (MND) of the CEQA document and how it pertains to Rangeland as well as Coastal Cultivators being able to transfer inland. I understand the reasons why the MND made in order to avoid the time and expense of getting an EIR so that we could get an ordinance on the books as quickly as possible. Now that an ordinance is on the books, we now have a realistic idea of what regulated cultivation will look like in our county. We know that there are not going to be huge multi-acre grows spread throughout the county. We know that the largest grow the county will offer is going to be what the State considers a "cottage" grow. As Diane Curry stated in the August 8th BOS meeting. The total number of acres of cannabis ACTUALLY growing if 10,000 permits *were* to be handed out would be roughly 3,000 acres. It seems reasonable that we could find a way to revisit the CEQA requirements to allow cannabis to be grown on Rangeland with the same restrictions as Ag Zoning being that agriculture and animal husbandry is what it is zoned for, and that we can allow cultivators on coast to transfer inland since we know that even if every cultivator in the county came into the regulated fold, the total growing area would be in line with the other major agricultural commodities in county. Has the county mitigated the environmental impacts of wine grapes or any other orchard with an extremely limiting Mitigated Negative Declaration. Knowing what we now know about the total size of cannabis growing in Mendocino County, it seems that if cannabis is going to be limited from future permits on Rangeland, then multi acre vineyards, orchards, or grazing operations should also be limited.

Allowing people living on Rangeland and coastal growers to come into the regulated fold now and in the future is important to many people who have been growing for years in the same way that I stated above in regards to transferability. Peoples entire lives are wrapped up in this. To limit their ability to retire or move on because they cannot transfer years of hard work and investment to someone else simply because they live on Rangeland or near the coast is extremely unjust.

To be sure that Hannah Nelson's letter to Dan Hamburg is referenced for public comment, I am also attaching it to this email

Thank you for your consideration.

Sincerely,

Jed Davis