

Greetings members of the board and whom it may concern,

My name is Blair Phillips I am a farmer in Willits, I have an application currently in with the dept of ag, was a compliant 931 participant and have been working with in the guidelines of the medical bills/ordinances that existed before that. I am writing you now to reiterate my concern over the proposed ordinance as it stands, first sharing a little history from my point of view.

It has been a long and tedious road trying to do the right thing and working with in the guidelines set before me. Going back to pre 931 program I had a constant concern of threat in that the grey and ambiguous areas of compliance did not afford much freedom from the possibility of persecution. As a provider for a small collective of patients that ranged from cancer to spinal discoid I was forever in fear of legal issues trying to help people. When the 931 program was rolled out, I didn't think twice about being apart of it. This was fortified as California climate with prop 64 seemed to provide more of a legitimate route free of persecution, and maybe for the first time, try to make a profit. Furthermore 931 participants were told that their participation would pave the way for a smooth transition to the ag department with a general air that if you were in the 931 program you had done the things that would be required of you to be compliant with AG. This could not have been further from the truth. The local sheriff and associated program never had a word to say about building and planning, or the water boards. (and frankly this would have drastically altered my decision to participate)

Both building and planning as well as the water boards inclusion in the AG dept application create a whole list of "upgrades" that people like me were far from ready for. In addition we are liable for these upgrades, even if we stop cultivating cannabis. As you know there are hundreds, if not thousands of properties in the hills of Mendocino that are full of unpermitted structures. Obviously upgrades to our properties are good for property values, and for tax revenue, and that's great; however, what is not great is that the way the ordinances/rules stand, they are still threatening any chance we may have at being able to pay for the upgrades that we are now being held to.

Further, for some one like me, who is in rangeland (wrongly zoned as such being in a range-less area) to be told that if I decide to stop growing my property is no longer a viable place to grow cannabis, (even though it had been farmed from antiquity) leaves me in a situation where I am supposed to make extremely expensive investments in the land, but would not be able to recuperate them should I decide to move on for any reason, (family, health, etc), lets not forget that the fire zoning does not allow me fire insurance. THIS IS UNFAIR AND UNJUST.

PLEASE "GRANDFATHER IN" EXISTING APPLICANTS PROPERTIES AND PAST 931 PARTICIPANTS TO BE SELLABLE TO NEW OWNERS/CULTIVATORS IF CURRENT OWNER DECIDES ITS TIME TO MOVE ON.

I leased my property before I purchased it due to the previous owner giving me an ultimatum of "BUY OR LEAVE". After crunching numbers it made sense to buy given certain conditions. I had figured out the learning curve to be able to provide for my collective based on available water and an existing greenhouse. All the structures on the property were unpermitted when I purchased the property. Having never heard from the county during the leasing years and given the sound construction methods of all said structures in addition to the fact that none of my neighbors have ever had issues in the over 30 years that they had lived here, it seemed to me like I could call this home given the limited funds that I exist by. Obviously I knew I would need to get these structures permitted to be apart of the AG department and was told multiple times between November 2016 and April 2017 that my greenhouse being class k would suffice for the ag department. Thus I hired Ruff and Associates to draw up plans for my metal green house with concrete stem walls so that I could move forward. Then once I got my plans in order (sometime in late may) I was told that class k would not work and I needed commercial ADA compliant structures. WHAT A MAJOR BLOW!

PLEASE MAKE ANY STRUCTURE THAT IS ELIGIBLE UNDER CLASS K AMNESTY THAT PRE EXISTED BEFORE THESE NEW RULES AND WAS IN COMPLIANCE FOR THE FORMER 931 PROGRAM "GRANDFATHERED IN" EITHER UNDER CLASS K OR AG EXEMPT.

Please reduce fees for farmers whom are showing that their methodology meets or exceeds the Mendo sustainability label, instead of charging us to prove ourselves, pay for the program from fees derived from farmers who don't care to meet these standards.

Finally for this note , I ask that you reconsider having a second track and trace program in addition to the state. This comes off to small farmer as redundant and excessive, resulting in more fees and paperwork that takes away from the field.

Thank you for your time continuously working these complex problems out and looking out for farmers like me who want nothing more than to do the right thing and live a simple life in compliance.

Blair Phillips