

**From:** Feliz Farms <felizfarms21@gmail.com>  
**To:** <bos@mendocinocounty.org>  
**Date:** 2/4/2019 4:18 PM  
**Subject:** Concerns over major issue with state cannabis permitting, please help!

Hello-

We would like to thank the Board for it's support of our local cannabis program and for all the time invested, as we know it was no easy task. There has been a lot of positive forward movement with the county cannabis program over the last year and we are very grateful to see these changes. However there is a major problem that has arisen with the state permitting through CDFA that threatens to wipe out our entire cultivation program.

As you are all probably well aware, CDFA issued Temporary Cultivation Licenses in 2018 to allow cultivators to operate while the final regulations were being ironed out and to give the state time to process application. However these temporary cultivation licenses all expire between now and April 31, 2019, and the state will not extend any licenses in 2019. To continue to operate, a cultivator must have an annual cultivation permit from CDFA.

Unfortunately there is a severe backlog at CDFA to process annual permits - in fact only 4 annual permits out of 9,445 temporary permits have been processed so far, or 0.1% of applicants. Our two family farms have held temporary permits since Feb 2 2018, and submitted for three annual permits with CDFA on June 29, 2018. Now over 7 months later, two have not moved past the "Owner Application Review" which is step 2 out of 8 in the processing status and one is on 'Administrative Manager Review', which is step 3 out of 8 in the processing status.

When we called CalCannabis last week to check on our application status and voice concerns over how slowly the process was moving, we were told to expect to have to wait another 7-8 month for our application to be processed. If any deficiencies are found - which is nearly guaranteed as the requirements have changed constantly over the last 12 months - another 1-6 month delay can be expected. This would mean we will have to wait a total of 14-21 months for our application to be processed at their current speed.

Meanwhile there is no stop-gap in place to prevent a lapse in permitting. When we inquired about the supposed provisional permit that was supposed to bridge this gap, we were informed that they will only be granted if an applicant is waiting on county CEQA or and LSA agreement CDFW, and only after the application has been reviewed and processed. Or in other words, the provisional license, as it stands now, will in no way be helpful to cultivators and will not bridge the gap and permitting as it was supposed to.

This is a huge problem and threatens the already struggling legal cannabis industry. Cannabis cultivation is seasonal, and very time dependent. It is simply not possible for a cultivator to wait for 7-8 months or more for an application to be processed - the season will be over by then and an entire year of production lost. Small farms like we have here in Mendocino are already struggling due to excessive fees and taxes at the state level. Being forced to shut down for a year or more or run this risk of operating without a state permit while waiting for CDFA will be a death-blow to every single farm in the county cannabis program.

We are requesting urgent support from the Mendocino County Board of Supervisors in this issue, as it immediately affects the viability of our cultivation program. Without authorization to cultivate this spring, our farms will fail. Thank you for your time,

Sincerely,

Brandon Wheeler  
Roger Wheeler  
Julee Wheeler  
Chanel Wheeler