

23 April 2019

To: Mendocino County Board of Supervisors  
CC: Brent Schultz, Julia Acker Krog, Matthew Kiedrowski  
FR: Jude Thilman, Executive Member, Mendocino Cannabis Alliance  
Dragonfly Wellness Center  
RE: Coastal Cannabis Facilities Code

Good Morning. We are incredibly gratified to see the county taking up the issue of cannabis facilities on the coast. It's been a bit of a wait.

While the staff recommendations are getting us going in the right direction, they aren't going to save many of our heritage cannabis craftspeople, who are dropping out almost daily.

My first concern, as always, is that many of our patients are losing the medicines that we have been able to provide them at Dragonfly for eight years now. We have several cancer patients, someone with ALS, arthritis sufferers, someone with a rare disease called porphyria -- all of them experienced healing effects when they were taking the finest, local heritage CBD tinctures and oils that we can no longer obtain.

I know specifically of eight medicine makers who have not been able to either obtain a permit or afford the mandated requirements. One is moving to Sonoma County, one to Colorado, one to New Mexico, and the others have had to simply stop making their products.

Beyond saving our family farms, which is the lead domino affecting all the rest of us, here's what we need:

1. **Permit level 1, non-volatile, manufacturing activities in coastal commercial zones.** We have auto body shops, hair salons, and other businesses that produce worse odors and more toxic fumes than anything you'll find in these benign processes. It does little good to allow level 1 manufacturing in industrial zones when there are not enough industrial zones or facilities in those zones to meet the need.
2. **Shared Facilities.** Fast-track permitting of shared use facilities where non-volatile manufacturers can take turns using the same space and equipment, similar to commercial kitchens.
3. **Distribution.** Please create practical and expanded permit processes for independent distribution operations in commercial zones. Using the coastal checklist guarding against excessive traffic, noise, unsightliness, and other potential affronts to our beautiful coast communities, we don't need to impose a lengthy and expensive Use Permit requirement. Smaller, less impactful distribution activities can fit well under a Zoning Clearance or Coastal Development Permit.
4. **Processing activities** limited to trimming and packaging in particular do not need to be tied to cultivation or retail activities. They can be included in Distribution activities easily. (§5303. Packaging, Labeling, and Rolling)
5. **Loosen the restrictive language concerning Microbusinesses in commercial zones.** For example, what is the rationale of tying all the allowed microbusiness activities to retail as a primary use?
6. Finally, kudos for the green light on **Cannabis Events**. We are into tourist season now; in order to capture that market, folks need to be lining up events and tours now. Please expedite those regulations.

Thank you for your kind attention.