



Feb 24, 2020

Re: Board of Supervisor Meeting 2/25/20 Agenda Items 4k, 5f, 6c,

Dear Honorable Board of Supervisors,

CCAG has reviewed the agenda and has provided the following input under each agenda item referenced below.

**Agenda Item 4k:** *Adoption of Ordinance Adding Chapter 10A.15A to the Mendocino County Code Establishing Additional Prohibitions on the Propagation, Cultivation, Raising and Growing of Genetically Modified Organisms in Mendocino County (Sponsors: Agriculture and County Counsel)*

CCAG supports the adoption of this Ordinance and are grateful to the County for recognizing the importance of placing protections against GMOs.

**Agenda Item 5f:** *Discussion and Possible Action Including Approval of the Mendocino County Cannabis Equity Assessment; Adoption of Resolution Establishing the Mendocino County Local Equity Program and Local Equity Program Manual; Authorization for the County Chief Executive Officer or Designee to Submit a Grant Application to the Governor's Office of Business and Economic Development for Purposes of Funding the Mendocino County Local Equity Program; and Allocation of One-Hundred Thousand Dollars (\$100,000) of Cannabis Business Tax in Fiscal Year 2020-21 as a Grant Match Upon Grant Award (Sponsor: Executive Office)*

CCAG is grateful to see this item on the agenda and we offer our full support for this item moving forward and establishing a Local Equity Program. We also feel that using \$100,000 of our cannabis taxes to grant match the State is a well use of our tax dollars and support this allocation. We look forward to the progress and development of this program. We would also like to thank the Mendocino Cannabis Alliance, the California Center for Rural Policy (CCRP) at Humboldt State University and the Humboldt Institute for Interdisciplinary Marijuana Research (HIIMR) for their contributions for the cannabis equity assessment for Mendocino, the Executive Office and all the Board of Supervisors that acknowledge our County deserves to be included in the State Equity program. This is an important step toward recognizing the impacts that the war on drugs has had in our County and in communities such as Covelo.

We would also like to encourage that a waiver in permit fees be included in the B. Services section on page 2 of the [Exhibit B LEP Manual Mendocino County 2.18.2020 Final](#) attachment.

**Agenda Item 6c:** *Discussion and Possible Action Regarding Recommendations of the Cannabis Cultivation Ad Hoc Committee (Sponsor: Cannabis Cultivation Ad Hoc Committee (Supervisor Haschak))*

In response to the Cannabis Cultivation Ad Hoc Committee Memo, we offer the following support or opposition on the following items:

1. CCAG **supports** the recommendation and it will align with the intent of Prop 64 to allow each individual an opportunity to cultivate 6 plants without canopy restrictions.
2. CCAG **supports** the recommendation. It will reduce staff time and costs to the cannabis program since the State already conducts scheduled and unscheduled inspections.
3. CCAG **supports** the recommendation.
4. CCAG **supports** the recommendation because it will help process the current applications in the county queue that are waiting for LSA approval and reduce the bottleneck for issuing county permits.
5. CCAG **supports** the recommendation by only requiring a ministerial process for 10K permits and under as well as the requirements for proof of prior attaching to the land and not the person. Those in resource lands should still be allowed to scale up to the 10,000sq ft if they are currently operating at a smaller license type.
6. CCAG **does not support** the recommendation. **CCAG suggests that expansion be allowed for up to 22,000 sq ft for ALL parcel types allowed in Phase 1 and in Phase 3.**

CCAG meets every Friday to discuss current and future policy issues affecting cultivators in our community and county at large. We have debated the issues of expansion and terms for Phase 3 on many occasions. On Feb 21<sup>st</sup> we held a special meeting to discuss this agenda item and specifically the recommendations for Phase 3 requirements. We have cultivators ranging from a 2500 sq ft to a 10,000 sq ft permit size and while some of our members support the proposed recommendation to allow 1-acre permits on AG parcels, the majority of our group is not in favor of this recommendation at this time.

After a healthy debate of the pros and cons we arrived at a compromise and would like to suggest that expansion be allowed for up to 22,000 sq ft for everyone in Phase 1 and in Phase 3. Many of our members still struggle to find outlets to distribute their products to and for prices that keep them in business. Large distribution companies have chosen to scale back on operations, some are closing, and we still do not have a robust retail market.

We do recognize the industry is ever changing and we feel it's important to have policies in place to reflect those changes when the time is right, such as federal prohibition ending. CCAG would then be open to a discussion to allow for larger permits but since the current marketplace has not seen more retail

growth, we need to pace the scaling up of operations. Allowing everyone an equal opportunity to scale to a 22,000 sq ft permit reduces division among our community and allows everyone an equal opportunity.

We must put the environment first and nurture the land that gives us our bounty and abundance. The county should incentivize regenerative cultivation practices that protect and promote healthy soil and encourages a vibrant sustainable future for generations to come. It's imperative we make this a priority in all of our business models first over profits. Especially if expanded sites are to be allowed.

Thank you for taking the opportunity to hear our concerns and suggestions for the various agenda items up for discussion. We appreciate the ability to provide our input and look forward to a bright and prosperous future for everyone in Mendocino County.

Sincerely,

Monique Ramirez  
Founder- Covelo Cannabis Advocacy Group