

**Karla Van Hagen - Letter regarding non-cultivation cannabis ordinance**

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**From:** "Casey O'Neill" <casey@cagrowers.org>  
**To:** <bos@co.mendocino.ca.us>  
**Date:** 5/22/2017 9:25 PM  
**Subject:** Letter regarding non-cultivation cannabis ordinance

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**TO: Mendocino County Board of Supervisors and County Staff**

**From: Casey O'Neill, HappyDay Farms, Vice-Chair California Growers Association**

We are grateful for the tremendous amount of time and effort that has gone into this issue, and for the genuine willingness by the county to get these policies right so that a sustainable cannabis industry can be fostered for the future.

We need to be careful not to overly restrict the authorized activities to specific zones which then may cause a shortage of available parcels or a price spike in those parcels available. There are a great many parcels with Commercial Zoning that will be appropriate for many types of cannabis activity that should be authorized. The following are comments offered on the attached items included in the agenda for this meeting.

**- Strong Support for Provisional Operation:** We are glad to see the changes made to the ability for operators to operate under provisional status through a regular business license while waiting for cannabis specific licenses to become available.

**- Support for Date of Compliance:** We'd like to communicate strong support for moving the date of requirement for operations to have existed "prior to passage of this ordinance".

**- Support for Farmers markets and Bud and Breakfasts:** Mendocino County is a leader in development of cannabis policy which has a tremendous effect at other levels of the policy discussion. We would like to suggest that Mendocino move forward with permitting these uses, which will be extremely beneficial to our local economies, and which will help to provide working templates for state regulators to review and adopt with their regulations

**- Cottage Manufacturing:** Despite the fact that the state has not yet designated the potential for cottage manufacturing, Mendocino County has a unique opportunity to lead the way in creating a regulatory pathway for these medicine-makers. It is not unreasonable that the state might adopt a similar set of regulations given an identified need from county processes.

**- Processing in Commercial Zones:** Processing of cannabis (i.e. trimming and packaging) should be considered analogous to brewery processes, which can be found within the county located on commercially zoned parcels. This analogous use would therefore not be in conflict with the general plan for Mendocino and would suffice to allow cannabis processing in commercial zones.

**- Manufacturing in C-2:** C-2 zones are often used for body shops, car painting and other heavy uses that would seem analogous to the types of uses that non-volatile cannabis manufacturing would create. It does not seem inconsistent with the general plan to allow manufacturing in C2.

- **20.243.150 Permit Types and Zoning Districts:** Based on the above reasoning, we'd like to again suggest that Table 1 include Processing as a Zoning Clearance Use in Commercial Districts, and that Non-Volatile Manufacturing also be considered a Zoning Clearance use in all Commercial Districts.

- **No Major Use Permit for Dispensaries:** Requiring a Major Use Permit for dispensaries in commercial zones seems excessive given the workload the county faces to bring the cannabis industry into regulation and the acceptable nature of commerce within these zones.

- **20.243.080 Manufacturing Facilities:** Non-Volatile Manufacturing should be considered a compatible use for Commercially Zoned parcels.

- **Waste Disposal:** What about empty plastic bags that held cannabis? Can they not be placed in normal trash disposal?

- **Microbusiness License:** Should be considered a compatible use with all parcels authorized for cultivation licensure, not just an industrial use type. This license is designed for cultivators. Restricting it to Industrial Zoning defeats the purpose of the license entirely.

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