

Honorable Board members,

Okiah 8/18/17

MORE than six months have now PASSED since the public workshop dealing with non-cultivation issues took place. That means that there are LESS than six months LEFT until the State license application window formally opens.

Some local operators were hoping to have been able to set up shop by now, at a time when the egg and chicken coexist, working to perfect purification protocols, and pesticide remediation procedures.

The overall process from plant to vaporizer cartridge involves an extraction step followed by a rather technical purification step. This latter step does not involve large volumes of volatile solvents, if any, depending on the provenance of the botanical extract. This latter step ought not to be confused with the very solvent intensive extraction step, even if virtually ALL extraction solvent is recaptured using closed loop extraction designs. Extraction invariably involves large volumes of solvent.

The point I am trying to make here is that although both these steps, extraction and distillation - looked at INDIVIDUALLY - will likely require a Type 7 license, a prospective toll operator focusing solely on the latter step will face unfair barriers of entry into a market where I-1 and I-2 zoning is scarce, all while his, her or their environmental impact is close to none, not exceeding that of any gas station, the average paint shop, EVEN Alpha Analytical on Mason Street.

The State will require detailed Standard Operating Procedures for everything you aspire to do under a Type 7 license.

Exclude detailed procedures for extraction and you're signaling that no extraction will take place. Or how about this:

Your favorite closed loop design is still undergoing certification and you're simply not ready to legally proceed. Or you may never extract, instead focusing on distillation and pesticide remediation.

I ask the Board to please consider allowing toll distillation operators to operate in C-zoning, if that is their stated business model. Subject to Use Permits, that is.

Not all of us need or want to vertically integrate seed to sublingual spray bottle.

Thank you for your continuing attention to this matter. Please don't let Mendo fall behind.

Sincerely,

James Seale, PhD