

Dear Supervisors,

I received a copy of the memo Hannah Nelson recently sent to you today regarding the Ad Hoc Recommendations. I have great respect and appreciation for Hannah and her dedication to the cannabis industry and regulatory process. I disagree, however, with her advocacy to include green house and hoop house cannabis cultivation under an "outdoor" permit.

I exchanged several emails on this subject with Hannah and the Ad Hoc Committee, but will review my comments for the full Board to consider.

Any crop grown inside a structure, whether it be glass, plastic or other synthetic materials...is not outdoor cultivation. "Outdoor", is just that, no doors, no walls, no structure.

I understand that Hannah's clients would prefer the lower fees associated with "Outdoor" permits and licenses compared to "mixed light" or "indoor" fees. I understand that structures certainly protect plants from dust or overspray contamination, but those considerations do not change the basic definition of outdoor growing conditions. I understand that the current price structure for cannabis flower favors "indoor" products, but those higher prices can support higher fees and cost of production.

In previous discussion, Sup. McCowen explained that County Counsel justified the use of enclosed, protective structures in "Outdoor" cultivation permits because if not including artificial light during the growing season, there was no "light manipulation" as in indoor and light dep cultivation. Unfortunately, County Counsel did not research "light manipulation" far enough. Many greenhouse and hoop house materials significantly alter the passage of solar radiation, some preventing only certain wave lengths, allowing others to penetrate. For example, many glass products allow infra red to penetrate while prohibiting ultra violet light, or vis versa. There is no substitute for the sun when it comes to natural plant processes.

The Mendocino Appellations Project has also opined that the terroir qualifications of origin are dependent on natural location features of the growing environment. We don't grow wine grapes in greenhouses or hoop houses for this reason! A greenhouse or hoop house alters these terroir features significantly and cultivators growing cannabis inside structures may not qualify for the "Mendocino Grown" distinction.

Cultivators should be free to choose what style of growing methods they prefer. But avoiding fees or manipulating growing conditions must not be the rationale for changing permit type definitions. Growing in a structure is "Indoor" with or without artificial light. Growing "Outdoor" is not in a structure. Please preserve this distinction.

Sincerely,

Corinne Powell