

To: Mendocino County Board of Supervisors  
From: Valerie Edwards – local farmer  
Re: BOS meeting on 5/14/19

Please consider the following suggestions to changes in the Mendocino County Cannabis Ordinance. If these charges are not considered, and hopefully accepted, then to leave these parts of the ordinance in tact turns patients into criminals AGAIN.

**Eliminate the 100 sq. ft. limit on personal use and reflect the State allowance of 6 plants (plus 6 if care-giving)**

I can understand the Board's desire to limit black market diversion but to limit everyone in the county to 100 feet for the sake of some diverters, has the unintended consequences of turning many everyone into criminals. This limit of 100 feet penalizes and potentially criminalizes every person/cultivator who chooses to grow their own.

**Eliminate 10-acre requirement for outdoor, personal use growers**

Please eliminate the County-wide requirement of 10 acres to cultivate personal-use, outdoor cannabis. At present, if a patient doesn't have 10 acres, they have to cultivate indoors. Indoor cultivation is expensive plus people cannot cultivate in a spare room in their house, they have to have a separate building on their property. Indoor growing requires expensive equipment, the cost of additional utilities, a higher risk of pest and biological infestation, and a fire risk. Most patients want the advantages of a sun-grown plant to take advantage of the medicinal properties that can only be had with sun-grown cannabis. Growing indoors or purchasing from a dispensary is very expensive and puts low-income individuals and families at a further disadvantage.

**Allow patients in the Accommodation Districts to cultivate personal use cannabis outdoors on less than 10 acres.**

The BOS has already authorized outdoor commercial cultivation in the Accommodation Districts so to limit patients to indoor serves no purpose or advantage. Outdoor cultivation is already allowed. Please include personal use outdoor cultivation for patients.

**Reduce set-back from residence of adjoining parcel in Accommodation Districts**

Within the Accommodation Districts, reduce the set-backs from the residence on an adjoining parcel to 40 feet. These are small parcels and many neighbors are already cultivating next to each other. If this is not reduced then each farmer may potential have to pay for an administrative permit – which is much more money on top of having to pay virtually the same fees as a 10,000sq.ft. cultivator. Smell is NOT an issue in the Accommodation Districts which was the reasoning for the setbacks in the overall ordinance.

**Transferability for the Accommodation Districts.**

The **Opt-Out Districts** are tied to the land. The **Opt-In Districts** should be tied to the land as well. This is entirely unfair, unequitable, and illogical to have it one way in one district and another way in another district.

**Eliminate Attitudes of Arrogance and Indifference of Mendocino County Staff**

Over the past 2 ½ years I have heard articulated an attitude among some county staff and elected officials that certain parts of the ordinance are written to limit cannabis activities and/or add

hard-to-comply-with requirements all the while acknowledging that people either cannot comply or cannot afford to comply with these aspects of the ordinance. Then the following comment has been consistent that "Not complying with the ordinance only matters if they get caught." This attitude is the epitome of arrogance and indifference for cultivators and especially for patients. Going with that logic is to say you can commit any crime but it is only a crime if you get caught. Please do not allow this type of mentality to be accepted among the staff. The Sheriff's department takes the "rule of law" very serious and they are tasked with upholding and enforcing this ordinance. Please support your Sheriff and his office and respect the growers of this county. I am appalled that staff and/or any elected official would think this type of attitude is condoned, encouraged, or normalized when it comes to the farmers of Mendocino County or for people in general. The above paragraph was based only on my personal experience.