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**To:** <bos@mendocinocounty.org>  
**Date:** 7/15/2019 4:15 PM  
**Subject:** Comments pertaining to the Econ. Devel. Ad Hoc Recommendation

CORINNE POWELL Ukiah, CA July 15, 2019 Dear Supervisors and Staff, I appreciate the Cannabis Economic Development Ad Hoc Committee's efforts to expand cannabis business opportunities in Mendocino County. Unfortunately, their efforts have been performed with minimal participation from the greater community, only select stakeholders. I regret the Ad Hoc recommendations are before the full Board without at least one public meeting to hear from the greater constituency. Regarding the Recommendations: 1. In addition to the Planning and Building Services Department assessing "the feasibility of developing a cannabis business innovation zone and identify potential sites" I recommend the Tax Collector's office also be involved. The Tax Collector was not consulted prior to the Board's decision to waive Masonite parcels' County property and sales tax revenue for ten years. No risk (loss)/benefit tax data was used in the Masonite promise and the Board will be irresponsible to move forward with the creation of new zoning without knowing the tax implications. 2. Support including cannabis events in Temporary Use Regulations. It is imperative that cannabis cultivators and businesses have access to public retail and consumption events in Mendocino County. There is no better way to showcase our cannabis history and specialty than at local events. 3. "Scaling up to larger than 10,000 square feet of cultivation" at this time is ill-advised. The expansion argument will benefit few local cultivators and better serve large corporate interests. Colorado, Washington and other jurisdictions, pioneers in the cannabis legalization landscape, have already learned the errors of assuming large scale operations and open permitting would maximize tax revenue, the only motive imaginable to increase license size now. The opposite occurred. Over production drove down prices, companies failed and anticipated tax revenue was not realized. Mendocino County had an established cultivation industry prior to legalization. Warehouse weed can be produced anywhere, but Mendocino heritage cultivation is different, superior and based on an outdoor legacy. This legacy deserves the protection and preservation our reputation of quality deserves. To accommodate those who feel it is their right to grow a large business and expand license size in Mendocino County, I recommend separating categories of cannabis licenses by "traditional" (small, craft, outdoor and qualifying for an appellations designation as only Mendocino's terroirs can grow...the small farmers, Mom and Pop's who came forward early in 1917 to be legitimate. The applicants and permittees who reconstructed and reorganized their farms and practices to comply with County regulations from the 9.31 program forward. The folks who invested to comply with existing ordinances may not be able to expand as the garden locations are predetermined by now. Irrigation has been established to comply with previous, existing regulations and there is no money available to expand, relocate and/or compete with options available to new, larger operations.)

Indoor and cultivations larger than 10,000sf must be considered differently and must pay higher fees and taxes. Fees and taxes must increase with area and volume of production if permit size is increased. These license types can be "expanded commercial", very different from "traditional". Larger businesses consume more resources, more staff time to monitor and potentially more significantly impact sensitive receptors. Biomass production, if a license type, is certainly not traditional and must, therefore, be considered as an expanded commercial license. 4. Emerald Triangle advocacy group?? Mendocino, Humboldt and Trinity Counties share a similar history as northern California area where cannabis has been grown for decades. I support an alliance between the Counties where small farmer advocacy is necessary at the state level. I do not support a merging of the Counties branding at the expense of losing Mendocino's name recognition, appellations and quality. "Mendocino Grown" must convey, MENDOCINO! No one is suggesting we join with Sonoma, Napa and Lake Counties to be the Northern California wine advocacy group at the expense of local recognition. Why forfeit the identity we have achieved. The Emerald Triangle describes a geographic area. I do not support a merge as a marketing strategy when we have battled so hard to secure a unique identity for Mendocino grown cannabis. I find the omission of County promotion for cannabis products and cannabis tourism a glaring oversight in the Ad Hoc's recommendations. Our county contributes nearly \$2M annually to market Mendocino wines, lodging, resorts, parks, beaches etc. Why does the County government continue to exclude cannabis in its marketing budget and goals?? 5. Phase 1 permittees were included in the baseline Mitigated Negative Declaration as there was proof of prior cultivation required. New Phase 3 applicants and any permit expansions are new uses, new environmental triggers, and they should be the private members of any private/public partnership funding new CEQA documents. Phase 1 licensees were and are allowed under current Mendocino County Code. Thank you for your consideration of my comments. Sincerely, Corinne Powell