



Mendocino County Board of Supervisors
501 Low Gap Road
Ukiah, CA 95482

November 11th, 2019

Re: Agenda Item 6C for 11-12-19 BOS meeting

Honorable Board of Supervisors,

The Mendocino Cannabis Alliance (MCA) has reviewed the following agenda item and has provided specific comments below. As always, we appreciate the opportunity to engage in this process.

Agenda Item 6C

Discussion and Possible Action Including Direction to Staff to Develop a Cannabis Cultivation Amnesty Transition Pathway (Sponsor: Supervisor Williams)

MCA strongly supports the concept of an Amnesty Transition Pathway and urges our supervisors to vote in favor of this item so that we may work with the county to explore the feasibility of this approach. We believe that a robust stakeholder process will be imperative to the development of this program and we are excited to provide input and support to the county. We are glad to see this item on the agenda and look forward to the discussion!

We are committed to assisting with the development of an Amnesty Program and have already begun to conceptualize necessary program components, identify potential obstacles and consider workable solutions. We are prepared to leverage our state and regional relationships to build a coalition around any state-level advocacy required for this to be successful.

The concept of an Amnesty Transition Pathway frames the legalization and regulation of cannabis production in our community through the lens of our actual current socio-economic and environmental predicament. Existing cultivators deserve to be treated with standards of humanity, equity and opportunity. We believe strongly that enforcement without opportunity is a broken paradigm, and that an Amnesty Program offers a much needed new paradigm for our community.

This is an opportunity to re-conceptualize the implementation of county permitting and state licensing through a phased approach that addresses the universal challenges of contracted compliance timelines, overburdened regulatory administration and insurmountable capital expenditures for operators - collectively disabling the viable implementation of cannabis regulation as a whole throughout the state.

Piloting this concept will position the Mendocino County cannabis industry and government at the fore of statewide efforts to pioneer meaningful cannabis policy reform. The state has an unprecedented appetite for these reforms at this juncture given the widespread challenges and acknowledged difficulties with the existing regulations.

Furthermore, it is apparent that this program concept is in direct alignment with the recommendations that resulted from the recent Cannabis Economic Development Ad Hoc Committee's stakeholder meeting process, and which were adopted by the Board on November 5th, 2019. This presents an immediate opportunity for the cannabis industry and county government to work together in partnership to deliver on the specific promises made such as:

- 1. Industry will collect and evaluate data on why unregulated people do not enter the legal market and advocate for them to join the legal market.*
- 2. County will collaborate with regional officials and government staff to advocate for needs.*
- 3. Industry will provide recommendations for improving permit process.*
- 4. Industry Associations and County will promote streamlined permit process.*
- 5. Industry will collaborate with regional industry groups to determine priorities and advocate for them.*
- 6. Industry will inform the County (and State) on legislative priorities built on successes and overcoming challenges and provide specific draft language.*
- 7. Industry will create a process to determine county and state legislative priorities.*
- 8. County will explore state funding opportunities that support and assist small cultivators. (Equity Grants)*

MCA has already begun this process by engaging both traditional and regulated operators and asking, "What could an Amnesty Transition Pathway mean for cannabis cultivators in legacy producing regions in California? What problems does it solve? What future does it offer?"

MCA will continue working to identify the myriad of reasons why people have stayed out of the regulated market. Collectively, we know what regulations are onerous, redundant and unnecessary, and which ones are effective.

Should the Board decide to vote in favor of this item and "Direct staff to formulate a cannabis cultivation amnesty program..." we are prepared to be a strong partner and ally in this effort, and will do everything in our power to make this program development process efficient and successful.

Sincerely,

The Mendocino Cannabis Alliance