



June 8th, 2020

Re: Board of Supervisor Meeting June 10th 2020
Agenda Items 5b, 6a, 6b,

Dear Honorable Board of Supervisors,

The Covelo Cannabis Advocacy Group has reviewed the agenda for the June 10th meeting. We are grateful to the Mendocino Cannabis Alliance for the memo they have submitted for your review. Our group intended to make specific requests to Agenda Items 6a and 6b, but after reviewing the information that has come forward from their memo, we stand in full support of the MCA recommendations. We do not wish to see anything jeopardize the necessity to receive a State Annual license. With that said, our group will refrain from offering support to any changes to the current 10A.17 cannabis ordinance until the State has confirmed which changes will not hinder a pathway forward for CEQA compliance with respect to the Appendix G questionnaire that is still being developed. We urge every board member to use the information that MCA has brought forward, to inform the decisions that need to be made to move our County in the right direction.

Our community has patiently been waiting for over a year to understand when the outstanding issues regarding CEQA compliance will be resolved between the County and State. The provisional license clock is ticking and we need to have a viable pathway to transition into our State Annual licenses for all of the cultivators in our current County program. We urge this board to make this a top priority before making any further changes to our current cannabis program at this time.

Agenda Item 5b

*Discussion and Possible Action to Approve the Mendocino County Proposed Budget for Fiscal Year (FY) 2020-21, Including All Recommended Actions and Adjustments
(Sponsors: Executive Office and Auditor-Controller)*

We are very excited to see that our County was awarded over \$2 million dollars in grant funding for the Local Equity Program. We want to be sure that the money allocated for administrative expenses be spent wisely and efficiently. It's important to have an experienced analyst to make sure every dollar is tracked to ensure that the funds are spent to help eligible applicants. The slideshow presented does not indicate how much money of the \$224,000 would be spent on an analyst. Without

this information, it makes it difficult for our group to take a position in support or opposition for this use of funds. We hope that during the board discussion, this expense can be clarified.

Agenda Item 6a

Discussion and Possible Action Regarding Recommendations of the Cannabis Cultivation Ad Hoc Committee (Sponsor: Cannabis Cultivation Ad Hoc Committee Supervisor Haschak)

Our group is not in favor of the proposed recommendations with the cultivation zoning tables provided for both legacy and non-legacy applicants. As written, it does not address the issue of disparity among cultivators based on parcel type. The only logical pathway forward is to allow each applicant the same opportunities in order to not create division among our cultivators. Our organization is in support of allowing up to 22,000 sq. ft. of cultivation across ALL zoning types with a Use Permit. However, due to the recommendations from the MCA memo as mentioned in our opening statement, we do not wish to see any expansion allowed at this time until further information is clarified by the State in regards to Appendix G.

Agenda Item 6b *Discussion and Possible Action Including Direction to Staff Regarding the Potential Re-direction of the Cannabis Cultivation Program (Sponsor: Supervisor McCowen)*

This proposal, while on the face seems like it could help get applicants through the licensing and permitting process in a more efficient way, it fails to address many underlying consequences as a result. The first being that by deferring to the State for a license, and essentially mirroring the State requirements, where does that leave our County in 2023 when larger licenses are allowed at the State level? The State also allows license stacking. How would this proposal address these concerns? Furthermore, it does not take into account the issues raised by MCA and how that could impact Phase 1 operators by choosing to end our 10A.17 program completely. This could potentially leave the option of the Appendix G pathway unviable for applicants. The costs to transition to a discretionary review permit are not known and that could add further economic strains on applicants. We must focus on our legacy operators and find a way for them to transition to an annual license before Jan. 1, 2022. That must be the primary focus for Mendocino County at this time.

Thank you for allowing us the opportunity to provide our feedback for the agenda items outlined. We appreciate your service to our communities across this County and we hope you will take our comments into consideration before taking any action on these items.

Sincerely,

The Covelo Cannabis Advocacy Group