

Dear Supervisors,

I whole heartedly support all MCA comments and recommendations from their prior and October 11, 2020 Memos addressing item 3a and 3b on tomorrow's agenda.

Although the Board of Supervisors has repeatedly professed to staff and the public that protecting small cannabis farmers and assisting Legacy permittees in securing Annual State Licenses is your highest priority, the past few months have proven otherwise. The Board has approved a Hemp Ordinance with many gaps of information and policy, requiring considerable staff time. Similarly, the current issue of debating Phase 3 and a discretionary use permit program and zoning/use chart revision have also monopolized staff's limited time.

The cannabis community expects the Board to honor your verbal and voted commitment to small farmers. Let me remind you that the Board has previously postponed commencement of Phase 3. There is nothing magical about April 1, 2021 to commence another permitting system, particularly because so many Phase 1 and 2 legacy permittees and provisionally licensed cultivators have no assurance they can continue legal operations in 2022. Staff recognizes that CEQA, as well as resource land policy issues are unresolved and recommends: "To be clear, a deferral from the Board of Supervisors on these items now for the sake of expediency will not preclude their potential addition to the cannabis cultivation program in the future." (PBS 10/13/20 Memo to the Board of Supervisors, page 2, Paragraph 2)

It appears to me that only Supervisor McCowen is heavily invested in opening Phase 3 and expanding permit sizes. His insistence in pushing for staff to "explore" a land use based permit system and "develop an example" of a discretionary land use ordinance has morphed into, "this is the new permit system". Even after the Cultivation Ad Hoc politely side stepped Sup. McCowen's request to join their Committee, and the CEO and PBS Staff respectfully requested Sup. McCowen not push for a separate Ad Hoc to analyze a land use permit ordinance, he has persisted. It is not clear whose interests he serves, but certainly not the majority of licensed cultivators and environmentalists.

Repeatedly PBS staff has cautioned the Board that they have no confidence in available and anticipated new staff to organize and digitize existing cannabis program files (approved and directed by the Board), resolve CEQA Appendix G and SSHR and CDFW restrictions, process 800 applications still pending from Phase 1 and 2...and develop a new discretionary use permit system prior to the expiration of State Provisional Licenses on Dec. 31, 2021.

It is logical to step back from the push to open Phase 3, and concentrate County resources on overcoming lingering obstacles to Phase 1 and 2 permittees obtaining Annual Licenses. Only then is another ordinance structure deserving of attention.

Thank you for your consideration.

Sincerely,

Corinne Powell