



February 22nd, 2021

Re: BOS Meeting 2/23/2021 Agenda Items: 6a, 4m, 4ac

Dear Honorable Board of Supervisors,

The Covelo Cannabis Advocacy Group (CCAG) is grateful to the Cannabis Ad Hoc committee for working diligently to find solutions for Phase 1 operators as the provisional license clock keeps ticking. We have provided the following comments below in response to the outlined agenda items for your consideration.

Agenda Item 6a

*Discussion and Possible Action Including Cannabis Cultivation Phase 1 Update, Status of the Third Party California Environmental Quality Act Consultant Framework and Process, Clarification of Environmental Mitigation Measures in 10A.17, Correction of Sunset Relocation Date for Coastal Area, and SB59 Support
(Sponsor: Cannabis Ad Hoc Committee of Supervisors Haschak and Williams)*

In reviewing the materials for this item, CCAG is in support of Staff direction on all 3 points raised. We attended an informal Ad Hoc Meeting on February 18th and received information pertaining to the SSHR requirement. We are encouraged by the new clarification regarding environmental mitigation measures and feel optimistic this will help many applicants currently in Phase 1. We do hope that the Board will seek further clarification on how to address applicants who will still need to have CDFW review. For example, if an applicant provides an independent biologist review for their project, (especially for expanded sites outside of the scope being deemed exempt), will the County consider not referring the application to CDFW for further review? From our understanding, the structural format of the CDFW SSHR Pilot Program gives the County some discretion in reviewing applications and deciding if further CDFW review is necessary or not.

CCAG would also like to get confirmation of how expanded sites, which were approved by an Administrative Permit or relocated a site due to setbacks etc, would be handled if they have not met the criteria outlined. We look forward to a robust and continuing conversation and input from Staff and County Council. CCAG would like to express special gratitude to both Supervisor Haschak and Williams for their dedication and perseverance in finding solutions for Phase 1 operators.

CCAG is in support of SB 59, which would extend Provisional State licenses until Jan 1st 2028. We believe that there should be added language to address the specific issues of CEQA compliance and how it relates to allowing existing provisional license holders to continue operating while CEQA requirements are met. We believe this is a key issue that affects many people throughout the County and needs to be addressed, especially for Phase 1 operators who may need to use a discretionary land use permit process in order to achieve CEQA compliance. Since they are existing legacy operators, it's imperative that there is a pathway for continued operations. We have attached our letter of support for SB 59 for your reference.

Agenda Item 4m

Adoption of Ordinance Amending Section 10A.15A.030 of the Mendocino County Code Modifying Certain Definitions Related to Genetically Modified Organisms

CCAG supports the amended language change to Section 10A.15A.030. We are grateful to the Board for their support of this important amendment change to the definition of Genetically Modified Organisms.

Agenda Item 4ac

Adoption of Resolution Modifying the Cannabis Program Manager Classification Specification to Report Directly to the Board of Supervisors as an At-Will, Unrepresented Classification and Amending Position Allocation Table Accordingly

CCAG supports the redline version of the Cannabis Manager application with qualification requirements. We also support the Cannabis Manager reporting to the Board of Supervisors at this time to ensure the County has a functioning program with transparency and oversight. We appreciate the Board considering this as a necessary priority at this time and for ensuring that nothing slips through the cracks.

Thank you for the opportunity to provide comment on these important agenda items.

Sincerely,



Monique Ramirez

for the Covelo Cannabis Advocacy Group