



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

April 12, 2021

Re: Cannabis Cultivation Activities Ordinance - 4/19/2021

Honorable Supervisors,

MCA stands fully in support of the licensed cannabis operators in Mendocino County who have been trying their best to navigate the county cannabis licensing program.

We support the Planning Commission's recommendations from 3-19-2021 that protect continuity of business for Phase 1 and 2 operators, including a 60 day early enrollment window and a streamlined Administrative Permit process for those who must transition to the CCAO.

We have the following additional recommendations for amendments to the proposed ordinance which are essential to protect Phase 1 & 2 operators as they move toward Annual Licensure:

- Continued operation under the restrictions of 10A.17 pending the processing of a Land Use Permit should be allowed for projects already in operation under Phase 1 & 2 that must transition to the CCAO.
- Allow for continuous, Prioritized Review of land use permit applications from existing Phase 1 & 2 Program Participants with complete applications whenever an application is submitted to Planning and Building Services for an Administrative Permit.
- Only apply Section 22.18.050(A)(5) of the CCAO for Land Use Permit denial of Phase 1 or 2 operators due to 'Non-responsiveness to requests for information from the County,' after all Program Participants have had at least 60 days to re-submit their full application in a digital format with clear instructions from the County, and a Start and End date for the submission window.

Continued operation for compliant Phase 1 & 2 operators. Continuous prioritized review of Phase 1 & 2 operators transitioning to the CCAO. Properly sort the wheat from the chaff: do not remove applicants from the program until they have a chance to resubmit a complete digital application for review.

We reiterate that MCA has always been in support of enforcement for egregious environmental crimes and dangers to public safety. A clear resubmission process is essential before determining who in the program should be subject to permit denial.

We implore you to please take these amendments into deep consideration and adopt them with the ordinance. We thank you for all the time you have taken with these delicate and complicated issues.

Sincerely,

Mendocino Cannabis Alliance