

Dear Supervisors,

There are many items to include in consideration of a new CCAO Facilities Ordinance.

In general, I recommend that the Board support more opportunities for cultivators to access events and venues where they can engage in direct sales to customers. Farmers markets and fairs are appropriate sales events.

The Staff Memo for this item lists:

"Further define "microbusiness" to clarify home occupation and cottage industry limitations"

as an item for additional Board consideration and direction to staff. I'm not sure if staff wants more definition of Microbusiness from the Board, or if staff is prepared to provide further clarification of home occupation and cottage industry limitations??

As I have advocated for several years, to be competitive with other regions of the state, it is imperative that we in Mendocino County are able to play by the same rules. Currently the Facilities Ordinance does not align with the state's definition of Microbusiness.

Our newly proposed Facilities Ordinance allows Microbusinesses where cultivation is allowed (previously only commercial zones were eligible) , but ...still... requires that parcels must have a residence and that the three or four activities of the Microbusiness must be limited to square footage and/or employee numbers commensurate with Home Occupation or Cottage Industry permits.

It is clear that the State has created the Microbusiness to allow smaller business to operate with greater functions and control their products from seed to sale, if they so choose, thus eliminating middlemen/chain of control transfers through other licensees. The maximum square footage allowed by the state is 10,000 for all activities included in the Microbusiness license; cultivation, distribution, non-volatile manufacturing and retail.

Home Occupation and Cottage Industry regulations were created to allow families or individuals to operate commercial activities in their homes. Cannabis cultivation has been discouraged in residential areas. Microbusinesses are not necessarily appropriate in residential settings and cultivation zoned parcels are not required to have a residence.

I recommend the Facilities Ordinance delete all reference to Home Occupation and Cottage Industry limitations from new regulations and accept the state definition for Microbusiness. This change will open marketing opportunities previously denied Mendocino cultivators.

The MCA has previously presented memos recommending amendments to the Facilities Ordinance. I support MCA's recommendations as no other organization considers all aspects of the cannabis industry in a balanced way.

Thank you for your consideration of my above recommendations.

Sincerely,

Corinne Powell