

Addressed to the Mendocino County Board of Supervisors - There's so much to say. To begin, I do not support the 10% expansion clause of the proposed Phase 3 ordinance, but I do support the ordinance itself for the potential it carries to bring more small farms online in the county. I'm writing this to advocate for small farmers, particularly for a Cottage Permit under Phase Three. 25 plant farms have been the backbone of our economy since passage of Proposition 215 and brought prosperity to our community. We can have that again with a streamlined and equitable permitting process that incentivizes those existing small farms to join the program. I have some recommendations for what small farms need to succeed in this new paradigm of regulation.

1. Exemption from the Satellite Enforcement Program. If small farms are to succeed, and be incentivized to join the program, leaving them out of the Enforcement Program is vital. People need to prepare for the realities of regulation, but can't do that in the face of lost income, asset forfeiture, fines and abatement. I suggest these people instead be informed of eligibility, be invited to join the program and allowed a grace period of x years to come into compliance.

2. Amnesty program for unpermitted buildings. This is also vital. We are a community of rural homesteaders and hand built homes and outbuildings are a normal part of that culture. This falls in line with what I stated formerly, people need to be prepared for the realities of regulations, but slapping people with hefty fines related to unpermitted buildings will not incentivize them to come into the light. An amnesty program and the issuance of class K permits is a viable solution.

3. Equitable access. Waived or decreased permitting fees, and a streamlined permitting process is vital. It should be as easy and cheap to get a county permit for under 2500 sqft as getting a business license for any small farm, pending a quick look at the property via satellite imagery to check for environmental damage. Realistic setbacks and waiver options for setbacks, lenient inspection qualifications, and lenient zoning qualifications are all things that should be discussed. As long as no one is wrecking the environment and the neighbors aren't mad, people should be allowed to grow.

4. Exemption from CEQA. I understand CEQA is a state requirement and as such can't be bypassed, but ideally it does not apply to these small farms. They're easily sustainable and too small to have any significant environmental impact. In lieu of exemption from CEQA, access to equity grant funds to pay specifically for CEQA, a Cottage Permit specific grant facilitated by the county, and payment plan options, are all viable solutions. Removing financial hurdles is key for these small farms to succeed.

5. Collectives and Appellations. Allowing cottage industry farms to form collectives related to their appellation for the purposes of branding and distribution empowers small farmers in the industry. Distributors are more willing to work with a collective of 20 farms that can provide larger amounts of similarly farmed and processed cannabis, than they are with a farm that turns out smaller amounts individually. This is a tool that can be successfully used to bolster cottage industry farmers against the larger players. Collective owned and operated processing facilities, distribution and transportation companies, retail locations, and the licenses associated with them should also be discussed.

To close, I would like to say that the Board of Supervisors has a great opportunity here to invigorate our local economy, bring tax money to the county coffers and uphold a local tradition and culture. But it's going to take amnesty, and an effort on the counties part to incentivize and encourage going legal. That takes equitable acces. It has to make financial sense for small farmers, and the permitting process has to be simplified. If we can achieve this, we can create an industry that can sustain the working class in Mendocino County, weed out the bad actors, protect the environment and stay close to our roots as small ganja farmers. Thank you for reading and for your consideration. - T.A. Hansen