

Members of the Board, Clerk and Department Heads,

The Julia Carrera & Associates Team writes to you, on behalf of our twenty two (22) team members. We are all deeply concerned with the inconsistencies of the MCP Portal, submittals, and staff reviews of the submittals.

Ms. Carrera has reached out to the Board Members to bring awareness to the Board of what is happening with our clients' submissions. Our office has been conducting application submittals since the beginning of this program, ready the moment the Portal was to open, of which it did eight hours later. Our office followed the Board of Directors Cannabis Ad-Hoc Committee direction to not respond to the 30 day notices after responding for some of our clients. This has left a portion of our clients in something called "Not Good Standing". How can following Board direction leave anyone in "Not Good Standing"? We are unclear as to what that actually means.

Our office represents 29 active Portal participants. An additional 21 of our Portal clients have chosen to exit the Mendocino County Program, primarily due to the inadequacies of the program. Their cannabis endeavors have moved to other areas. We have a substantial history of both Mendocino County and State application completeness on the very first submittal, a track record we are proud of.

Each one of JC&A's portal applications was deemed incomplete. Each application incompleteness has, at the very least, one - mostly more- incompletes due to MCP staff errors. Please note, our staff has made typographical errors and copying errors, of which we take full responsibility for and some have lost their position because of it.

We have one application that has been deemed complete. Originally it was deemed incomplete, due to the MCP program/Building and Planning not having a record of a title transfer from a dead husband to a wife three years prior. The incomplete stated we had the incorrect Grant Deed, when in fact, JC&A had the correct one and MCP did not. We also had incompletes for Assessor cards that identified the items required in the Portal, but staff did not see/find them, even though our submittal directed them to it.

The incompletes continued for SIUR and Annual Water Use Monitoring. 98.75% of our clients would not have received those incompletes had we known we needed to upload these documents and /or there was a location in the portal to upload them to.

The incompletes continued with non-cannabis ponds and water sources. Had JC&A known non-cannabis items were to be included in the Portal, of course we would have provided any required documentation. There was no notification from MCP to the public via Portal workshops, Portal FAQs, or email clarifications that non-cannabis items of any kind were to be included. Infact, there is no place to upload these items to the Portal. These incompletes could have easily been avoided.

We had one incomplete on a State issued Well Completion Report with the State Request Form and the State letter responding to the request. MCP staff created an incomplete stating "it isn't for this parcel". Is MCP staff correcting state water board issued information?

The incompletes continue with contiguous mapping, where certified and/or licensed seasoned professionals on the Bay Area who make up our 22 team members and have knowledge of the requirements of mapping for this Portal. Yet, MCP staff has deemed "doesn't look like 200 ft" and the MCP Manager stated the distance is 100ft. MCP staff has also stated our mapping "assurts cultivation can take place in forested areas". A contiguous map is just that. There are no assertions when it comes to professional mapping. Mapping is for clear items requested/required to be mapped. In this case, for existing contiguous cultivation, not future cultivation.

It appears reasonable to allow those that are working through these Portal shortfalls, to continue to do so after October 30, 2021, when the Portal is scheduled to close. In our thirteen (13) years in five (5) counties conducting successful compliance, we have never experienced this type of lack of a pathway forward to licensure. The public was told this process was for reapplication due to the MCP never processing original applications. Yet new requirements have been popping up during this Portal process. Many of our clients who have never received their first staff inspections from MCP are the ones hardest hit by these Portal inconsistencies.

It doesn't have to be this way.

Thank you for your time and consideration,

The Team at Julia Carrera & Associates

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The JC&A Team

Julia Carrera & Associates