Nina Holloway - Comments on OA 2017-0001 Cannabis Facilities Code (CFC)

From: Patrick Sellers <patricksellers23@gmail.com>

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Date: 9/6/2017 3:35 PM

Subject: Comments on OA_2017-0001 Cannabis Facilities Code (CFC)

TO: Mendocino County Planning Commission

FROM: Patrick Sellers, Streamline Development Solutions

SUBJECT: OA 2017-0001 Cannabis Facilities Code (CFC)

Dear Honorable Commissioners,

Thank you for your efforts to increase the economic potential that the cannabis industry brings to Mendocino County by creating opportunities for non-cultivation businesses to co-exist here along with our permitted cultivation operations. It is essential to the local economy that all business/license types created by the state through MAUCRSA have sufficient options to find a home here in the county immediately during this earliest phase of the transition to fully regulated statewide market.

We are a production county and our local producers are deeply concerned with the lack of local options for manufacturing, processing, packaging, testing and distribution centers available to them this harvest season. In order for their businesses to compete throughout the state and survive beyond this year, they need competitive local options for creating value-added products and distributing them to the consumption market regions of the state.

It is also important to note that the Track and Trace program the county chose only works to brand Mendocino cannabis if the product doesn't have to leave the county in order to be manufactured, packaged and distributed. Without business licenses available for these business types, none of the county's product will be branded 'Mendocino' as was the intention for the Track and Trace program.

The current draft Cannabis Facilities Code (CFC) puts excessive limitations on the near-term growth of the non-cultivation industry and puts our county at a severe disadvantage. Specifically, we suggest you consider the following amendments to the current draft:

- 1. Provide applicants with a Provisional Business License upon submission of application and zoning clearance.
- 2. Permit Microbusiness Licenses in AG with Zoning Clearance.
- 3. Require Major Use Permits for Volatile Manufacturing Licenses only.
- 4. Permit Processing in C1 and C2 with Zoning Clearance.

- 5. Permit Non-Volatile Manufacturing in C1 and C2 with a Use Permit.
- 6. Permit Dispensaries in C1 and C2 with Zoning Clearance.
- 7. Permit Retail in C1 and C2 with Zoning Clearance.
- 8. Permit Home Cottage production of cannabis products.
- 9. Match CFC Definitions with State Language for 'Customer', and 'Volatile Solvent'.

Additionally, please continue to support Cannabis Farmer's Markets and allowing distribution of Free Samples for Patients at Medical Dispensaries.

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Thank you for considering these suggestions,