

Nina Holloway - Fwd: Comments Regarding OA_2017_001 Cannabis Facilities Code (CFC)

From: PBS PBS
To: Victoria Davis
Date: 9/7/2017 8:05 AM
Subject: Fwd: Comments Regarding OA_2017_001 Cannabis Facilities Code (CFC)

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>>> Jed Davis <jed@mendocloneco.com> 9/7/2017 6:55 AM >>>

Dear Commissioners,

I appreciate the opportunity to add perspective to the forming of the regulatory process for the cannabis industry in Mendocino County. I would like to bring to your attention that up to this point, there appears to be a propensity to over-regulate the cannabis industry as it emerges out of the shadows of prohibition. During prohibition there were many ill-formed opinions based on propaganda, misinformation, or ignorance. Many maligned opinions were also justly formed based on problems and issues that arise from a black market economy. As we move out of the black market economy and into a transparent, regulated, and accepted economy, a majority of those issues that people complain about and of which the county and state are trying to mitigate will no longer be present. Gone are the black-market/criminal elements, the massive black market profit margins, and the ancillary problems that are associated with unregulated, criminal enterprises.

As we move forward into "cannabis normalcy" I would like everyone to keep in mind that as the dust settles, cannabis will become the same as any other farmed plant or regular business enterprise, with the same processes and the same profit margins. I would also like you to keep in mind that over-regulating this emerging industry based on opinions of an old paradigm will hinder the average farmer or budding business person in Mendocino County. It is imperative for you to treat cannabis facilities like any other business and make the process as easy as possible and able to operate in as many zones as possible for two reasons:

1. To preserve what many consider to be the backbone of the Mendocino County economy without causing a disruption to the businesses of many residence who are already operating.
2. To allow Mendocino County businesses to seamlessly move into the State Regulatory process by being locally compliant. If businesses are burdened by a lengthy application process and restricted by a limited

supply of available space to conduct business, Mendocino County Regulation will in fact be taking a "limiting" position on the cannabis industry rather than a "promoting" position.

With this in mind, I would like to make the following suggestion:

- 1) Come to this regulation creation process with the frame of mind of creating the least possible obstacles for the cannabis industry rather than more obstacles. Do not create over bearing regulations such as requiring physical barriers between two separate cannabis business located in the same building or on the same parcel. In other words, treat the cannabis industry like you would any other type of business that is currently doing business.
- 2) Testing, Dispensing, and Retail should only require Zoning Clearance. These are normal retail businesses that should not require a Major Use Permit in order to open. If you have not already visited a dispensary or testing facility, I encourage you to experience one first hand. You will see that they are safe, clean, and professionally run.
- 3) Allow Nurseries that grow their nursery stock in a remote location to operate a storefront without falling under the regulatory guidelines of dispensaries if they do not offer consumable goods. Nurseries located on FL, RL, and TPZ are not allowed to have customers come to their location and thus need a central location from which to sell their plant starts so that they are not driving all over the county or meeting customers in parking lots or on the side of the road.
- 4) If packing and processing facilities of agricultural products are currently allowed to be developed in RL and AG zoning, then new processing sites should also be allowed to be developed on RL and AG, not just "existing" processing sites.
- 5) Allow indoor cultivation in buildings that have been grandfathered for industrial use but are located on C2 zoned parcels as long as it meets all of the guidelines for indoor cultivation under the Chapter 10A.17 Medical Cannabis Cultivation Ordinance.

Thank you for considering these points and being conscientious to come from a reference point of helping the cannabis industry continue to be a major and healthy part of our local economy.

Sincerely,

Jed Davis
Mendocino Clone Company
Potter Valley