The Willits Environmental Center urges the Commission to reject the proposed amendment to the Cannabis Ordinance referenced in the staff report and described at the bottom of page 17 of the proposed amended Ordinance as "Notwithstanding the Above Table 1 Under A and B". This proposed amendment would allow non-storefront retail sales of cannabis products at ANY cultivation site that has been permitted or is in the process of being permitted pursuant to Chapters 10A.17 and 20.242.

This proposed amendment creates a potential situation similar to that which caused an uproar in rural neighborhoods in Sonoma County suddenly besieged with commercial traffic. In Oregon, where the cannabis has been legal for several years, retail sales at the cultivation site are not allowed, but instead are permitted in commercial zones, thus avoiding incompatible uses and other impacts. Allowing retail sales at any cultivation site, permitted or with an application in process, raises questions regarding how track and trace will work, how pesticide and fungus content standards will be assured as well as issues regarding infrastructure for retail customers. For example, will porta-potties be sufficient infrastructure at these sites?
We further urge the Commission to reject the finding that such a sweeping land use change in the Ordinance, i.e. allowing non-storefront retail sales of cannabis products as an accessory to any permitted cultivation site, or site in the permit application process, will have NO potential environmental consequences and thus requires NO additional environmental review. Such a finding flies in the face of reason and jeopardizes the validity of the Ordinance and its enforceability.

Finally, as a solution, we urge the Commission to delete this particular amendment at this time and proceed with the adoption of the other proposed amendments without delay or the need for additional environmental review.

Thank you for your consideration of these comments.

Sincerely,

Ellen Drell for the Willits Environmental Center