



July 17, 2019

Mendocino County Planning Commission  
501 Low Gap Road  
Ukiah, CA 95482

Re: Agenda Item OA\_2019-0002 (Proposed Changes To Inland Ordinance/MND)

Dear Honorable Commissioners:

On behalf the Covelo Cannabis Advocacy Group (CCAG) we greatly appreciate the efforts that Staff has taken to thoroughly investigate each of these items. Our organization would like to offer our input on the following recommendations that are being brought before you.

**Item 2:** Nurseries are a crucial component for cultivators to be able to source plants and seeds from. CCAG would like to offer a recommendation to reduce the acreage requirement to less than 5 acres. This would open up more opportunity for those wishing to obtain Nursery licenses that do not meet the current acreage requirement. Mendocino County should be encouraging smaller producers an ability to operate as much as possible to garner greater participation in the County cultivation program. Cottage style nurseries are needed and should be supported.

**Item 4:** CCAG is in strong support of transferability. ALL license holders should be allowed to transfer their business to a new owner if they so desire. With respect to the exception of not allowing those in the Accommodation Combining Zone to transfer a permit, our organization strongly disagrees with this recommendation. Our community was one of the chosen locations due to the history of legacy cultivation that has been occurring in our rural neighborhoods. It has been the only way Covelo has stayed afloat during the lapse of the logging industry.

Through the lengthy process it took to allow these sites to operate beyond the sunset clause of the county cannabis ordinance, neighbors had to weigh in by vote in order to be an eligible site. Those in the Accommodation Zones in Covelo Core, Covelo Fairbanks, Laytonville and South Leggett should not be singled out and not afforded the ability to transfer their permit to a new operator in the future. We have recognized as a County that

these are unique legacy sites that do not reflect the same values or beliefs of other areas of the County, therefore making them eligible in the first place. These sites are limited to 2500 square feet of cultivation with no opportunity to ever scale up beyond this permit size. Planning is about looking ahead into the future. We hope that this Commission recognizes that those in the Accommodation Zones are the smallest cultivators with the least amount of financial backing. Their business investments will have a direct impact on the economy of our County in the long term but only if they are supported in building it. We urge this Commission to recommend to the Board that those in the Accommodation Combining Zones be included in the allowance for transferability based on the reasons just provided. Our organization believes this is one of the reasons we have not seen the participation that was anticipated because of this disallowance.

**Item 7:** The deadline to apply for a cultivation permit in the Accommodation Districts closed on July 3<sup>rd</sup> 2019, which only gave applicants 6 months to apply. The County offered satellite offices to help bring people in to apply and answer questions, which was a great tool for the community to use. Unfortunately there was limited notice to the public on these events and many did not understand when there was a deadline. We have not captured all of the participation that could have been realized and CCAG recommends that the window to apply be extended to the end of the Phase 1 application deadline, which is October 4<sup>th</sup> 2019. This will help bring more participation into the program and help to recover some of the costs associated with setting up these special areas.

Thank you for taking the time to consider our recommendations.

Sincerely,

Covelo Cannabis Advocacy Group