

Exhibit C

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Subject: RE: Correspondence: Letter from Kathie Lane, FW: Planning Commission recommendations

From: Kathie Lane <lane.kathie@gmail.com>

Date: May 9, 2019 at 7:19:14 PM PDT

To: district1@co.monterey.ca.us, district5@co.monterey.ca.us, district2@co.monterey.ca.us,
district3@co.monterey.ca.us, district4@co.monterey.ca.us

Subject: Planning Commission recommendations

I obtained these few items below about the Cannabis committee meeting this week and feel that all of these suggestions are adding to a "pilot program" that already has issues very concerning to the residents where some of these programs are to take place...for example changing the setbacks from 1000 ft to 50 ft is totally ridiculous. I feel some of the issues brought up by planning Commission sugar coats this industry by not holding them accountable to neighbors, parks, etc just as the county puts such strict restrictions on regular agricultural growers. 50ft would never fly when a regular grower is anywhere near neighborhoods, schools, churches, parks, after school programs etc with the buffer zones. Why is this any different? You will not be able to mediate the smell either with outdoor growing even with 1000ft and now they want you to go to 50 ft. You will be opening possibilities of law suits when you have the grower practices like chemicals, etc so close to neighboring properties. You have our complaints and concerns about these issues which will show you neglected to protect residents at the expense of trying to make money for the county not to mention the lack of law enforcement. You haven't even done your due diligence by doing a complete EIR for the area. I feel this is also negligence on the county. We don't have all necessary info needed and neither do you to make decisions without having additional info on the impact that this can have on us and the environment. Also you should update budgeting for increase law enforcement, feet on the ground, not just fly by and have in place before introducing the Cannabis program to especially neighborhoods whether incorporated or unincorporated, especially for a high crime product, legal or not...you are increasing crime element to our area which we already have our issues.

Do not add any more issues/concerns as listed below...these are already more than was told at any of the area meetings.

1. Replace the 10 acre minimum lot requirement with a 2.5% of lot size up to 10k sq. ft. (ala Mendocino County);
2. Reduce setback requirement from 1,000 feet to 50 feet "or as needed";
3. Add a residency requirement (someone must live on site ala "homestay STR");
4. Allow qualifying applicants on grazing and farmland zoning;
5. Clarify the fee issue for aerial enforcement (as written it appeared legal growers were being asked to foot the bill for the sheriff to investigate illegal grows).

Kathie and Dennis Lane
21900 Parrott Ranch Road Carmel Valley
Sent from my iPad

Spencer, Craig x5233

From: Janis Lou Dickinson <jld84@cornell.edu>
Sent: Friday, May 10, 2019 7:48 AM
To: Spencer, Craig x5233
Subject: Cannabis growing in the Cachagua area

Dear Mr. Spencer and planning board members:

I'm very concerned about the lack of investigation into the impacts of outdoor cannabis growing proposed for the Cachagua/Jamesburg area. This is a residential area with about 900-1000 people. The water supply is already challenged. Many have wells pumping just 3 gallons a minute. Further, I see no evidence of analysis of environmental impacts of this land use change. Growing cannabis involves water, disposal of waste, possible use of pesticides, potential for use of poisons to control rodents (these also kill wildlife, including Yellow-billed Magpies, which are already challenged by west Nile virus, other birds, bobcats, mountain lions, and more) in addition to getting into the water supply. With the odor will come declines in tourism and declining property values. The character of the area will change and fires will become more likely. People who grow cannabis will not live on site and this means fires ignited by equipment, cigarettes, or vehicles will not be detected until they are out of control. An EIR would also include projected changes in car traffic. The road we take to town (yes, just one) is winding and dangerous and increasing the numbers of trucks cars will certainly increase road mortality.

What is particularly disturbing is to hear the planning board's description of our area in the newspaper - as if it is all open space and no one lives here. It's a gorgeous area to live and despoiling it with odors, overuse of water, poisonous chemicals, and nonresident land use will potentially ruin the quality of life we have worked so hard to attain. Putting something like this through without an EIR is irresponsible and a disservice to the community that will be affected by these changes.

Janis Dickinson
Professor Emerita of Natural Resource, Cornell University Owner and resident, 37503 Tassajara Road



Wildlife Emergency Services Box 65 Moss Landing, California 1-866-WILD-911 admin@wildlifeservices.org

5-9-19

Monterey Board of Supervisors: Chairman Alejo, Supervisor Adams, Supervisor Lopez, Supervisor Parker and Supervisor Phillips,

CC: California Coastal Commission, Agricultural Advisory Committee, County Planning Commission

RE: Outdoor Commercial Cannabis Cultivation in Monterey County

Dear Supervisors,

Just this morning we became aware of the proposed Outdoor Cannabis Cultivation Program that would allow commercial marijuana grows in certain portions of Monterey County, and we'd like to share our concerns.

Our initial concern is there has not been enough notification to the greater Monterey County area, informing them of this proposed program and allowing for their input. It is not just the selected areas that will be impacted. Additional time is needed to hear from more of the public and experts.

According to the Staff Report (5/9/19), it does not appear the California Department of Fish and Wildlife, specifically their Cannabis Program, have been involved - and we feel it imperative they weigh in on this, since the program is sure to complicate if not hinder their efforts in the community.

Additionally, there are California Species of Special Concern and Federally Endangered species in the areas listed for increased development. One species in particular, that is sure to be heavily impacted, is the dusky-footed woodrat. The California condor and steelhead would also be impacted. Again, there is need for input from California Department of Fish and Wildlife and the US Fish and Wildlife Service, as well as local environmental experts who can explain the unique impacts this program might have.

The potential environmental impacts would be thoroughly investigated through an environmental review (ER) required by the California Environmental Quality Act (CEQA). However, for some reason this project is being rushed through due to some sort of exemption? This is not acceptable! This program may have a significant effect on the environment and therefore requires a formal review. Approval of this program without an ER would be remiss, irresponsible, and, as one opponent already stated, challengeable.

Additionally, as for the language of the ordinance, we believe any project with the potential to increase conflicts between humans and wildlife - like this one, must include preventive requirements to reduce the clashes between humans and wildlife, because, in the end, wild animals and the environment tend to lose such battles. We have seen this play out, firsthand, and the consequences are brutal.

I am sure you're aware of the environmental damage caused by illegal marijuana grows, but residential and commercial agriculture practices also have devastating impacts on wildlife and ecosystems - specifically the use of pesticides and rodenticides.

Anticoagulant rodenticides used to control mice, rats, gophers and ground squirrels are killing predator species. When a rodent consumes the poison, they become poison. Anything that consumes them - a hawk, an owl, bobcat, coyote - even a dog or cat, will get a dose of the poison, and that's what is happen to predators throughout California. It's likened to DDT. Slowly pervasively working into the food chain until species collapse. There is legislation in the works (AB 1788) aimed at reducing use of certain poisons due to their environmentally devastating impacts.

In general, conventional cultivation of a crop means increased use of synthetic chemicals and pesticides. That is essentially what is being invited into some of the most environmentally sensitive areas of Monterey County. Without language in the the ordinance explicitly requiring preventive measures so to reduce conflicts and limit use of environmentally harmful chemicals, the surrounding ecosystem will suffer. From bees to owls, eagles, bobcats and steelhead - they will all be at risk of impact if nothing is put in place to prevent it.

We have extensive knowledge and experience reducing wildlife conflicts - *from mice to mountain lions™*, and would like to help come up with language for the ordinance that would reduce conflicts with wildlife. We would also like an opportunity to expand on the unique impacts this project might have on the local wildlife.

Thank you,

A handwritten signature in black ink, appearing to read 'Rebecca Dmytryk', with a stylized, flowing script.

Rebecca Dmytryk
President and CEO
Wildlife Emergency Services

Sylvia J Zoellin
PO Box 1617
Carmel Valley, CA 93924
(831) 238-5136

May 6, 2019

Monterey County Planning Commission
1441 Schilling Place
Salinas, CA 93901

Re: REF1250048 – Outdoor Cannabis Cultivation Pilot Program
Meeting – Wednesday, May 8, 2019

Dear Commissioners:

I am opposed to the Outdoor Cannabis Cultivation Pilot Program in Cachagua/Carmel Valley for the following reasons:

- Water Usage

The Cachagua Valley does not have enough water to sustain more water usage. Our tributaries to the Carmel River dry up earlier and earlier each year stranding and killing the Steelhead. Steelhead are a threatened species.

"One 10,000-square foot grow requires approximately ¼ acre foot of water per year."¹

To put this into perspective, a ¼ acre foot is 81,462.75 gallons. During a dry year several years ago I used only 10,000 gallons all year. So, one 10,000 sf commercial grow uses 8 years worth of water for me. I find it appalling.

I believe that the vineyards and residential growth have caused this dilemma, and adding cannabis grows will only further exacerbate the problem. On one 5.5 miles stretch of Cachagua Road there are 9 vineyards that I am aware of. Those vineyards must have hundreds of acres of grapes that require water during the same summer months that cannabis will.

As a little background, I have lived on the Carmel River for about 47 years and have witnessed the frightening decline of a river once teeming with fish to a river in ruin.

- Safety

It has long been known that Cachagua, Carmel Valley and Big Sur have not had adequate Sheriff's presence. For the most part they only come to Cachagua when called. The wait time can be hours.

The Cachagua area is a rugged and remote area that will be difficult to patrol. It can be a 2 hour round trip from Salinas just to get there and back.

To have an industry that is fraught with crime in such a remote area is dangerous and will be difficult to protect for both the growers and the nearby residents. There have been 2 armed cannabis robberies in the Salinas area within the last year. One on 7/16/18, and most recently 03/21/19ⁱⁱ

There are areas in Cachagua without cellular service, and GPS can send someone up to 5 miles from the address they are looking for.

As further example of safety issues, the California Highway Patrol (CHP) could not find my house without detailed directions, and during the Basin Fire, the Sheriff's office was going door to door with evacuation orders. They never made it to my house to tell me to evacuate.

The Sheriff's office at a minimum needs to have a full time dedicated Deputy with a 4X4 to even begin to adequately patrol these areas. With \$300,290 for overtime, service and trainingⁱⁱⁱ it is not nearly enough.

- Environmental Concerns

Fertilizers, Pesticides, Herbicides, Rodenticides can all play a part in the destruction of our Bald Eagles^{iv}, Condors, Steelhead, honey bees, etc. We cannot afford to lose our precious wildlife again.

These are all toxins and are killers. Even a product that is labeled natural or organic can still be poisonous.

Again, cannabis comes on the heels of the vineyards and residential development to further add to the problem.

- County of Monterey Budget

It is unconscionable that the County of Monterey facing a \$14,000,000.00 budget shortfall for 19/20 fiscal year and a forecasted \$36,000,000.00 deficit the following year with a potential loss of 70 full time positions^v could consider implementing a brand new program that "It is anticipated that the outdoor grow pilot tax revenue will be less than augmentation costs."^{vi}

- Program Notification

Unfortunately, this program has not been well publicized. It wasn't until March of this year that I knew it even existed, and most I've spoken with have not known about it either. Residents should be notified by US Mail about the potential impact facing their neighborhoods. It feels like this program has been on a fast track and is being rushed to completion.

Selection Criteria of Participants

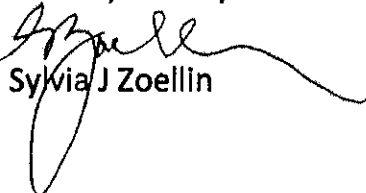
This program is only allowing a select few to participate. As a pilot program, it should be open to all. It feels out of balance. It will be easy administratively because the legacy growers have already been through a similar permitting process, but the monitoring in such a remote area will prove extremely difficult.

A pilot program should encompass all types of potential growers and all areas of the County in real life scenarios for it to be a true experiment. It should be short term and small of scale. 5 years is too long.

In conclusion, please do not rush the decision to allow the Outdoor Cannabis Program without substantial changes. It is too important to the environment and residents to be hasty. There needs to be further environmental studies, proper notification to the affected public, selection criteria changes, budgetary considerations, safety and sanitation issues.

With 2.4 million square feet in cultivation,^{vii} the residents of Cachagua and the County of Monterey really do not need additional commercial grows to monitor especially in such an environmentally sensitive with largely inaccessible areas.

Thank you for your time and consideration.


Sylvia J Zoellin

ⁱ Page 7 Meeting Agenda Cannabis Standing Committee April 11, 2019

ii

<https://www.kion546.com/news/employees...up...marijuana...robbery.../769053265>

<https://www.kion546.com/news/salinas-pot-farm-robbed-at-gunpoint.../1061389192>

ⁱⁱⁱ Page 17 Meeting Agenda Cannabis Standing Committee April 11, 2019

^{iv} <http://pineconearchive.com/190301PCfp.pdf>

^v The Californian April 12, 2019

^{vi} Page 17 Meeting Agenda Cannabis Standing Committee April 11, 2019

^{vii} Page 8 Monterey County Weekly April 11-17, 2019

Subject: RE: Outdoor cannabis pilot program

From: john Defloria <john@bigsurcannabotanicals.com>
Date: May 7, 2019 at 10:59:11 AM PDT
To: Egonzalezsr56@gmail.com, Richcoffelt@msn.com, Getzelmanpc@co.monterey.ca.us,
Amydroberts@ymail.com, Kvandever@gmail.com, Mvdiehl@mindspring.com,
Monsalvee@co.monterey.ca.us, Mduflock@gmail.com, Mendozafl@co.monterey.ca.us,
Ambrizanal@gmail.com
Subject: Outdoor cannabis pilot program

Dear Planning Commission,

I am writing you today with my concerns about the new ordinance for Outdoor cannabis cultivation.

I support this ordinance as written, but my concern is that because it is so limited, that the County will not have enough qualified applicants to make it a successful program.

The county could very well lose money, when it has the opportunity to revive a once thriving industry and generate significant tax dollars.

The ordinance is limited to pre-existing farmers, which makes the pool of possible applicants very small. It then layers on additional restrictions that decrease the numbers of possible applicants to a very small group.

The two most limiting restrictions are: 1) Lot Size 2) Setback

Lot Size: The ordinance currently restricts the lot size to 10 acres or more. However, many pre-existing farms are much smaller than this. A better regulation would be that a property could grow 2.5% of lot size with a maximum of 10,000 square feet. This is what Mendocino County has done.

Setback: The current proposed setback is 1000ft. Other counties use 100 to 200ft. The 1000 ft. Setback is extremely restrictive based on the unique topography of the Santa Lucia mountains and will greatly decrease possible participation. A better regulation would be 200ft setback, and that a neighbor could waive the setback in writing as done in other agricultural contexts.

Other Issues include:

Canopy Definition: The definition of how canopy is measured will greatly affect the farmer's ability to pay taxes and be able to create a viable business for the duration of the pilot plan/ future.

I am suggesting a definition that includes being Non contiguous and measures the soil surface square footage

Max Canopy 10,000 sq/ft: The County could generate more tax revenue by increasing the maximum square footage for certain qualified large properties.

Permitted structures: Farmers would like the opportunity to do what is necessary to get their homes permitted and up to code. We would like there to be a grace period s they have done in other counties. Some of our farmers lost their homes during the Soberanes Fire and have not been able to re-build, either county hold-ups or just can't afford it.

Transfer Program: Some operators that were cultivating legally prior to, and up until, the moratorium enacted in 2016, have lost their properties and gardens for a variety of reasons including but not limited to:

Fires, loss of lease, sale of property etc. In some cases loss of leases and property sales were a direct result of compliance with the county moratorium on outdoor grows. 3 years of not being able to legally cultivate and the loss of income is the result of this compliance. I would like to see further definition of what property exchanges might be acceptable in these instances so the operators who were respectful of the moratorium could relocate to another location and start cultivating legally again.

In our instance, our business model was based on offering cannabis from our Carmel valley garden as well as from our neighbors in Big Sur. . It may be difficult to find another property to move to that had a previously existing legal garden but other properties might be acceptable for other reasons including but not limited to cultivation of other crops or similar uses.

I welcome the opportunity to dicuss this matter further with anyone from the county or who might have an interest.

Thank you for your time and consideration in reading these comments. We believe that this program, if properly designed can:

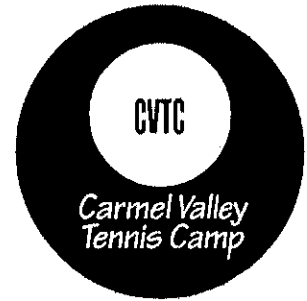
- Serve the local economy
- Create an additional tax base
- Protect legacy farms who were legally compliant
- Preserve a certain market sector for the county in this new industry
- Protect the natural environment
- Honor the heritage and tradition of a local community

Kind Regards,

John DeFloria

Co-owner Big Sur Cannabotanicals
Dispensary.
831 915-7164

Sent from my iPhone



20805 Cachagua Road
Carmel Valley, CA, 93924

P 831 659 2615

F 866 809 9089

May 7, 2019
Monterey County Planning Commissioners
Re: Pilot Program for Outdoor Cannabis Cultivation

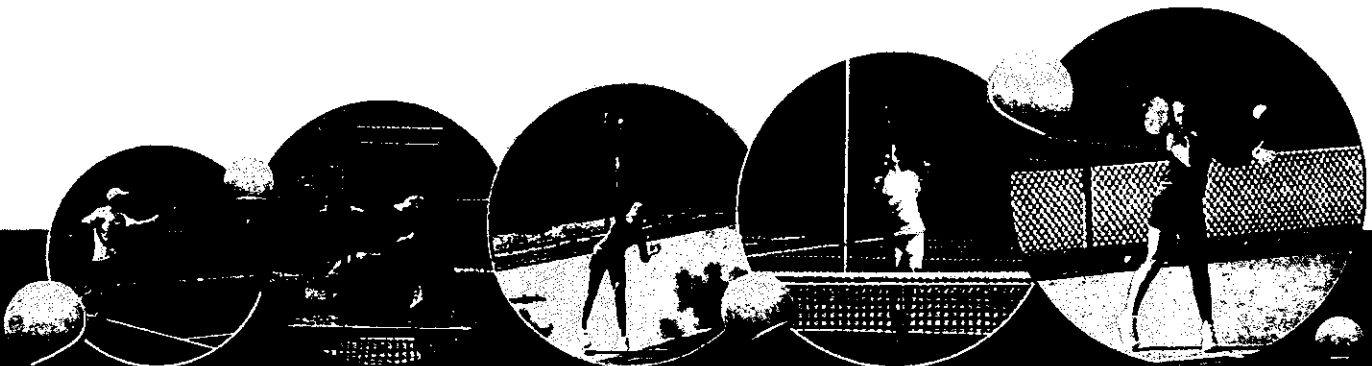
Having had the opportunity to attend the April 11 Board of Supervisors Subcommittee hearing on the proposed ordinance for a pilot program for outdoor cannabis cultivation, and then having the chance to read through the draft ordinance provided to us by Acting RMA Planning Manager Craig Spencer, we wanted to express some of our thoughts on the proposed pilot program. We recognize that recreational cannabis use is now legal in California while still being illegal on the federal level.

We have concerns because we own and operate Carmel Valley Tennis Camp, a sleep away summer camp for 53 children each session ages 10-18 with a staff of 15-20 between the ages of 19 and 25. We work with young people and the presence of cannabis cultivation in our area will be a detriment to our business.

Following are our three most pressing concerns:

1) We believe that a pilot program allowing outdoor cannabis cultivation needs to go hand in hand with an eradication of illegal grows. The only way regulated, and therefore much more costly grows, can succeed, is if the illegal and much less costly grows, are eliminated. At the April 11 meeting County staff stated that there is no money budgeted for additional law enforcement personnel.

2) We also believe strongly that a pilot program allowing outdoor cannabis cultivation in the Cachagua area would need to go hand in hand with a much greater law enforcement presence than what exists currently. Again, at the April 11 meeting County staff stated that \$300,000 is budgeted for the Sheriff's Department in the first year of the program, but it is



Tennis... and a whole lot more!

www.carmelvalleytenniscamp.com



20805 Cachagua Road
Carmel Valley, CA, 93924

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only for code enforcement and would not include additional law enforcement presence in the cultivation areas. Does this mean that law enforcement will only be monitoring the pilot program plots while driving past illegal plots? We believe a Sheriff in residence would be a necessity. Does the County have the funds to support such a program?

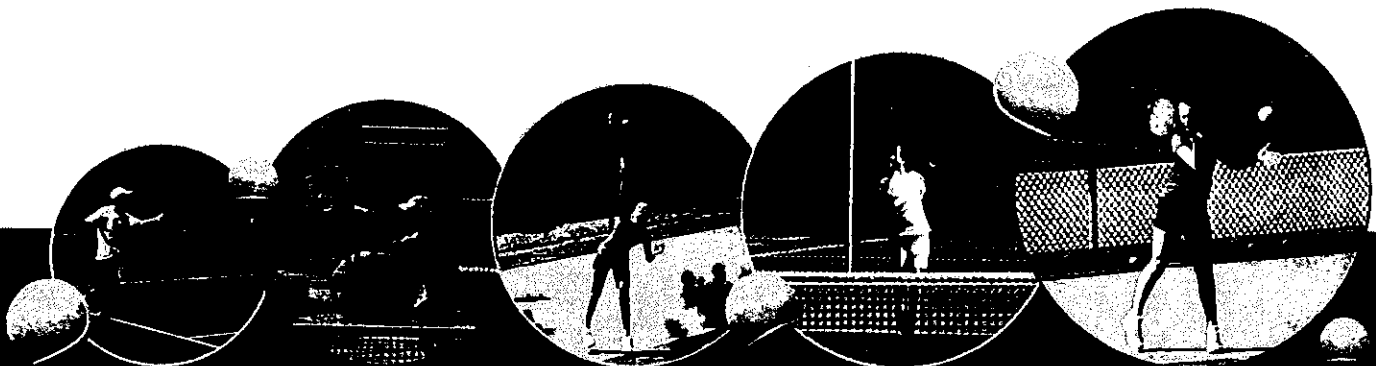
3) From a bigger picture view, we believe the County needs to make the purpose for allowing outdoor cannabis cultivation much clearer. The draft ordinance states "The purpose of the pilot program is to analyze the impacts of outdoor commercial cannabis cultivation." We assume that the purpose behind this stated purpose is the development of significant tax revenue for the County. If that assumption is correct, then this program will not achieve the desired result. It will, however, be costly to the County, and have an unintended negative impact on the unincorporated portions of the County to which it is proposed. In addition, County staff at the April 11 meeting stated that the proposed program is expected to run a substantial deficit (\$300,000?) in the first year. Why would the County embark upon a program that is expected to lose money?

We would appreciate our concerns being addressed by the County.

Sincerely,

Aimee Reeder *Susan Reeder* *Steve Proulx*

Aimee Reeder Susan Reeder Steve Proulx



Tennis... and a whole lot more!

www.carmelvalleytenniscamp.com

George R. Walker, Esq. (1928-2018)
Hansen P. Reed, Esq.
Ashlee E. Gustafson, Esq.
John N. Staples, III, Esq.



Via Email, and
U.S. Mail

May 7, 2019

Carl Holm, AICP, RMA Director
Monterey County RMA
1441 Schilling Place, South 2nd Floor
Salinas, CA 93901

Author's Email Address:
HReed@walkerandreed.com

Re: Monterey County Planning Commission Meeting May 8, 2019
Item 5: REF150048 – Outdoor Cannabis Cultivation Pilot Program

Dear Mr. Holm:

Since 2017, I have sent several letters and appeared in front of the Board of Supervisors and the Planning Department on behalf of several row crop farming families in the Salinas Valley who have concerns about the cannabis zoning. In reviewing the May 8, 2018 Monterey County Planning Commission Agenda, my clients learned that the Planning Commission is considering making a recommendation to the Board of Supervisors on draft ordinances amendment Monterey County Code to create a pilot program for limited outdoor commercial cultivation of cannabis in certain unincorporated areas Monterey County.

My clients and many others in the unincorporated areas of Monterey County oppose the drafting of outdoor cannabis regulations and the pursuit of outdoor commercial cannabis cultivation in Monterey County. The County lacks the resources to address outdoor growing effectively, it is too early to expand the scope of cannabis cultivation, there could be substantial increases in environmental harm, it will be difficult for outdoor cultivators to meet safety and security requirements, and increased land, development and labor pressures will negatively affect the agricultural industry.

County resources for preparing and monitoring outdoor cultivation are limited and should not be used on a new project while the current resources are not enough to regulate indoor cultivation. There are still many other issues to be considered. If resources are pulled away from other necessary regulatory work and the enforcement of current regulations it will result in harm to the residents of Monterey County - including cannabis licensees - as important problems go unaddressed. **My clients do not want the County to be in a position where they have to rob designated funds from other worthwhile government resources and programs in order to subsidize the costs of implementing outdoor grow permitting and regulation.**

WALKER+REED
ATTORNEYS AT LAW P.C.

Adult-Use Cannabis cultivation and sale has only been legal since January 1, 2018. We should see how operations run for several years before exploring or expending to open grow. As noted in prior Board of Supervisors' Board Reports, there is already about 8 million square feet of potential growing capacity within existing indoor and mixed light facilities. There is little or no data, and no one knows how this capacity will affect the market for commercial cannabis in the County. Allowing for increased cultivation, without having any information on the current needs of the California market could lead to an oversupply of cannabis, putting smaller operations out of business and harming the nascent industry. While many other crops, excess capacity can be exported to other states or countries; that is not an option here.

Not only will the outdoor cultivation proposal take away resources from current licensees, many other industry groups would benefit from County attention, resources, and services, which this proposal could displace. The County should work to ensure the system currently in place is effective and worthwhile for its residents, operators, and industry of before prioritizing a new set of regulations that will disrupt the market.

Outdoor growing could have significant environmental impacts that may not be present with indoor cultivation, such as additional harm to the waters of our County. It has been well-documented in Humboldt, Mendocino, and Trinity Counties that outdoor cannabis cultivation has cause environmental degradation. The California Water Resources Control Board has identified several concerns associated with outdoor cannabis cultivation. In particular, there is an increased risk of (1) illegal diversions of streams that harms beneficial uses and/or senior water rights holders, (2) poorly maintained and constructed roads and excavation/development of cultivation areas that causes sediment pollution from soil erosion which negatively impacts local wildlife, (3) potting soil, mulch, amendments, fertilizers, and pesticides being stored improperly or improperly applied, mobilized by runoff and discharged into surface waters, (4) the generation and improper storage and disposal of hazardous waste, and (5) deforestation and increased erosion due to cannabis cultivators doing their own clearcutting to develop an open space for their grow-sites without considering the environmental impacts.

The County already faces a substantial water shortage. It would be irresponsible for the Board to open up our precious lands and waters to an immature industry with little or no experience in properly preserving and protecting the environment. The largest industry in this county consists of our well established and regulated agricultural industry, a \$4.4 billion dollar industry. Increasing the risk to our land and water, and by extension, one of the key industries in our County is reckless. The short-term pursuit of increased tax revenue should not endanger the future health and sustainability of the County as a whole.

My clients are also very concerned by security issues with allowing outdoor cultivation. If farmland allows cannabis cultivation, it increases the risk of crime and harm to farm owners, their workers, and the community at large. An outdoor growing area, will likely be more expansive, will be more open to the public, and could result in increased crime and diversion of cannabis to the illegal market. Securing an open field is difficult and will likely require increased fencing - which causes its own set of problems and environmental harms. In comparison, providing security for an indoor cultivation site is relatively easy. It is much easier to control the security and flow of

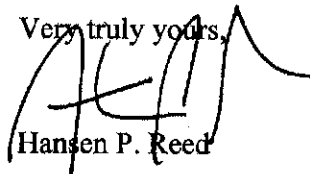
cannabis goods from a building than from an open field. With so much cultivation space already available, it would again, be an irresponsible increase in risk to allow outdoor growing.

Further, like most new laws that are proposed, they tend to start off more restrictive and over time expand. My clients anticipate that within a short time, if outdoor grow is allowed in the proposed areas, that it will expand into the Salinas Valley and other parts of the unincorporated areas of Monterey County. Opening up the market to outdoor cannabis cultivation will have a negative impact on the agricultural industry due to increased land values, development pressure, and labor costs which will negatively the County as whole. We have already seen a negative impact to the flower and floral industry due to indoor cultivation. The cost of leasing greenhouse space has drastically increased over the past two years. Many greenhouses that were once used to grow roses, orchids, carnations and other flowers are now allocated to cannabis cultivation, putting florists out of business or forcing them to move to less desirable locations - or to other states/counties. Our clients fear the same would happen to farmers because of outdoor cannabis cultivation. The land rush that will ensue if outdoor cultivation is allowed will result in substantial harm to smaller scale (and even some larger) operations in our area.

Finally, allowing a cash crop like cannabis to be grown outdoors could result in many farm owners trying to shift their operations in that direction or new actors entering the market, reducing the supply of usable land for crops and increasing costs and expenses for all farmers. For example, there is already a shortage of reliable and experienced labor in Monterey County. Allowing another avenue to divert labor - in particular to a crop that remains classified as a Schedule 1 Controlled Substance - will directly harm Monterey County Agriculture.

Please feel free to contact me if you have any questions.

Very truly yours,

A handwritten signature in black ink, appearing to be 'Hansen P. Reed', written over a horizontal line.

Hansen P. Reed

HPR/bhs

CC: Clients

Spencer, Craig x5233

Subject: RE: Correspondence: Letter from Oliver Bates- FW: Outdoor Pilot Program!

-----Original Message-----

From: ollie baba <bigsurfarms@gmail.com>

Sent: Monday, May 6, 2019 12:22 PM

To: egonzalezrsr56@gmail.com; ambrizana1@gmail.com; richcoffelt@msn.com; Mendoza, Francisco Javier <MendozaF1@co.monterey.ca.us>; Getzelman, Paul C. <GetzelmanPC@co.monterey.ca.us>; mduflock@gmail.com; amydroberts@ymail.com; Monsalve-Campos, Etna <MonsalveE@co.monterey.ca.us>; ClerkoftheBoard <cob@co.monterey.ca.us>; kvandevere@gmail.com; mvdiehl@mindspring.com

Subject: Outdoor Pilot Program!

Dear Monterey County Planning Commission,

My name is Oliver Bates and I am president of the Big Sur Farmers Association. We are a non profit policy and advocacy group representing local Big Sur and Carmel Valley Farmers. I am a second of three Generations of Cannabis farmers currently on the coast of Big Sur and the third of four generations of my family from Carmel. And I am concerned about the outdoor cannabis pilot program draft and the way it stands now.

Two rather harmless seeming issues, around the 1,000 foot set back and minimum acreage of 10, could effect more than 50 percent of our association farmers, which we estimate to be about half of all the participants in this pilot program.

To state openly and honestly, I am terrified of what the Cannabis Standing Committee and RMA have presented as they have proven time and time again that they hold only the weight of the outside investment that lobbied for Industrial frame works provided from other states and law enforcement. There is no concern for our environment and best practices that keep it safe. Only the bare minimum to pass CEQA with no regard to the people that have created this industry and stewarded this land to the gold standard of environmentalism that it is today. This is the way of life we have created as a community. This is not coastal development , this is coastal preservation.

Please make no mistake, our communities are fighting for there lives with no support for small business, agrarian rights, craft products, or cannabis. I ask you plainly, how have you enjoyed our communities for the past 50 years? Do you appreciate the coast the way it is, or do you approve of the billionaires squeezing out the millionaires to build a bigger house and fence off more public access. We are turning into a gated adult community, a dead village if you ask me, without the sounds of music and children laughing. This is because of the policy that the county government knows better than our coastal community on how best to deal with this very unique region.

Most farmers in our region are very small scale and should not have to be subject to these expensive and terribly misinformed regulations. There is about 80% of our members that are far under 2,000 square feet and are applying the smallest possible licenses types available. I would like to remind all of you that these are not commercial farms, they are homesteads. This is not a new way of life for us. In fact we are some of the most famous and distributed cannabis farmers in history. Many of our community farmers and cultivars are currently appreciated on a international scale. Our for fathers created this industry on the belief that this is plant medicine that can cure the world, not a drug.

Please understand that we are the greatest source of community driven research you can find for your county. By limiting us from having these small farms, you are destroying your own reputation. The whole of the cannabis industry understands that this, outdoor issue of the little people taking on industrial agriculture to protect there rights and livelihoods, is a David and Goliath battle. And when I am telling our story, to national and international press, I have been so proud to say we have been working with our county to find common ground and create this pilot program for our local community together. I ask you, do you stand by your community?

With all respect and optimism, there would be a path forward by following your local farmers to get them exactly what they need to smoothly go into business. These are homesteads built by hand and free of outside investment and devolvement. We have been burned, flooded, and overwhelmed by tourism that benefits only a few miles of our Coast. The only appropriate mixed use of our lands is Agriculture. The only Agriculture historically in Big Sur is Logging, cattle, and marijuana. Unfortunately the cattle is only on a couple wealthy ranches and we can not log any more. What does that leave us with if you over regulated these small and peaceful homesteads to the point of non participation?

All of these issues expressed are just scratching the surface of them. There is a judged disconnect between powers to be and the people that created this for you. So in the spirit of how the coastal commission started, we have started as well. We have started by speaking out a path of higher ground as there has been very little support to do this in a timely manner. Instead they have bankrupted most of us for three years and are still nervous of our high quality products that will contrast there market mule mediocrity. We are now working with The California Department of Food and Agriculture on a Appellations working group. We are aiming to protect our heritage, best practices, and the legacy we leave behind (see attached pdf of CalCannabis Appellation working group participants). We will be just a part of a bigger picture that has united the most distinguished California cannabis growers and producers.

Please look to your community for the answers and please know we are grateful for the opportunity to lay to rest the war on drugs. Although we are still being criminalized, we are showing up with open arms and we are inviting you in anyway!

Oliver Bates
President of the Big Sur Farmers Association bigsurfarms@gmail.com

CalCannabis Appellations Working Group - Organizations Invited to Participate

(All information was provided by the representative or published on the organization's website)

Antelope Valley Cannabis Association

AVCA was founded in 2017 with the mission to work with members of the cannabis industry in Antelope Valley and Mono County, members of the community, and the county and state to develop common sense regulations that allow communities and businesses to grow while supporting the responsible and ethical use of cannabis and cannabusiness practices. AVCA has agreed to represent cannabis businesses and cultivators in the Antelope Valley region to the CalCannabis Appellations Working Group.

Big Sur Farmers Association

BSFA is a non-profit organization formed to represent cannabis farmers of the Santa Lucia Region and to identify and promote the region while preserving the legacy farming of Unincorporated Monterey County. BSFA leads by example with responsible land stewardship, promoting sustainable farming practices, educating the community, law enforcement and policy makers, helping protect the rights of farmers, support commercial businesses, empower both legacy and new cannabis farms, and set the standards for high quality cannabis farming. BSFA has agreed to represent cannabis businesses and cultivators in the Santa Lucia region to the CalCannabis Appellations Working Group.

Calaveras Cannabis Alliance

CCA is a trade organization dedicated to the protection, preservation, and sustainable development of the cannabis industry in Calaveras County. CCA advocates for the development of reasonable cannabis policy in Calaveras, and supports members with education designed to grant members security in both the local regulatory scheme and the statewide market. CCA has agreed to represent cannabis businesses and cultivators in Calaveras County to the CalCannabis Appellations Working Group.

California Agricultural Commissioners and Sealers Association

CACASA is a voluntary organization comprised of County Agricultural Commissioners and County Sealers of Weights and Measures from California's 58 counties. CACASA provides the venue for collaborative opportunities to address matters of statewide significance that effect California's agricultural production, its natural resources, marketing, food safety, equity, and public health as it relates to our environment. CACASA has agreed to represent California Agricultural Commissioners to the CalCannabis Appellations Working Group.

California Cannabis Industry Association

CCIA's mission is to promote the growth of a responsible and legitimate cannabis industry and work for a favorable social, economic, and legal environment for the industry in the state of California. CCIA's Retail & Delivery Committee addresses all issues related to streamlining business practices to public safety and health. This committee has been directly involved with educating the industry on the evolution of regulations related to packaging and labeling regulations, and continues to provide strategic comment on evolving regulations. CCIA has agreed to represent California retail and delivery cannabis businesses to the CalCannabis Appellations Working Group.

California Cannabis Manufacturers Association

CCMA represents professional cannabis product manufacturers, and works to improve and protect a strong business climate for California cannabis manufacturers and cannabis producers. CCMA has agreed to represent California cannabis manufacturers to the CalCannabis Appellations Working Group.

California State Association of Counties

The primary purpose of CSAC is to represent county government before the California Legislature, administrative agencies and the federal government. CSAC places a strong emphasis on educating the public about the value and need for county programs and services.

CalCannabis Appellations Working Group - Organizations Invited to Participate

(All information was provided by the representative or published on the organization's website)

Cannabis Association for Responsible Producers

Since the passage of AUMA, CARP Growers have been involved in shaping Santa Barbara County regulations in an effort to ensure best practices in Carpinteria Valley. The mission of CARP Growers is to foster a positive relationship with the community of Carpinteria by promoting best practices among cannabis growers. CARP Growers has agreed to represent cannabis businesses and cultivators in the Carpinteria Valley region to the CalCannabis Appellations Working Group.

Cannabis Distribution Association

CDA represents a diverse group of licensed cannabis distributors throughout California with the shared goal of establishing best practices and standards for commercial cannabis distribution. CDA has agreed to represent California cannabis distributors to the CalCannabis Appellations Working Group.

Cannabis Marketing Association

CMA was established to bring the cannabis marketing community together so that best practices could be shared through collective knowledge. Today, CMA seeks to formally establish these best practices and further elevate the discussion about the modern brand of legal cannabis. CMA has agreed to represent California cannabis marketing professionals to the CalCannabis Appellations Working Group.

City of Weed Appellation Development Committee

Council Members of the City of Weed have adopted a resolution to organize a standing Committee for appellation designation criteria development for the City of Weed. The City of Weed Appellation Development Committee has agreed to represent the City of Weed to the CalCannabis Appellations Working Group.

Coachella Valley Cannabis Alliance Network

CVCAN is an organization that provides a responsible and productive voice for the cannabis industry in Coachella Valley through innovative and effective programs in development, operations, regulations and outreach. CVCAN has agreed to represent cannabis businesses and cultivators in the Coachella Valley region to the CalCannabis Appellations Working Group.

Consumer Federation of California

CFC is a nonprofit advocacy organization. Since 1960, CFC has been a powerful voice for consumer rights, campaigning for state and federal laws that place consumer protection ahead of corporate profit, and appearing before state agencies in support of consumer regulations. CFC has agreed to represent consumers to the CalCannabis Appellations Working Group.

Humboldt County Growers Alliance

HCGA is the trade association advancing the interests of the legal and responsible cannabis businesses in Humboldt County. Built on a foundation of fifty years of innovation, HCGA members are statewide leaders for environmentally and ethically produced cannabis, supporting thousands of local jobs and millions in tax revenue and driving the majority of economic activity in Humboldt County. HCGA works to preserve, protect and enhance Humboldt County's world-renowned cannabis industry. HCGA has agreed to represent cannabis businesses and cultivators in Humboldt County to the CalCannabis Appellations Working Group.

International Cannabis Farmers Association

ICFA's mission is to empower the traditional cannabis farmer through research, education, and advocacy. ICFA is a group of farmers, scientists and stakeholders working together to promote the unique quality and ecological superiority of sun grown Cannabis products while preserving the heritage of traditional farming communities. For more information please check out ICFA.farm. ICFA has agreed to represent cannabis cultivators and the perspective of legacy cultivation activities to the CalCannabis Appellations Working Group.

League of California Cities

The League of California Cities is an association of California city officials who work together to enhance their knowledge and skills, exchange information, and combine resources so that they may influence policy decisions that affect cities.

CalCannabis Appellations Working Group - Organizations Invited to Participate

(All information was provided by the representative or published on the organization's website)

Lompoc Valley Cannabis Association

LVCA is comprised of cannabis business owners and ancillary business owners in Lompoc, CA and Santa Barbara County. LVCA strives to unite the Cannabis Industry within the city of Lompoc, CA along with Santa Barbara County to help educate on the positive effects of cannabis, advocate for those who use it or do business by it, and bring the community together through leadership and positive example. LVCA has agreed to represent cannabis businesses and cultivators in the Lompoc Valley region to the CalCannabis Appellations Working Group.

Napa Valley Cannabis Association

NVCA's mission is to protect their agricultural heritage, promote Napa Valley Cannabis as the best in the world and enhance Napa Valley's global reputation as a premier agricultural region and visitor destination. NVCA has agreed to represent cannabis businesses and cultivators in the Napa Valley region to the CalCannabis Appellations Working Group.

Nevada County Cannabis Alliance

NCCA is a policy and trade association who's mission is to Advocate, Educate, and Connect. NCCA advocates for reasonable local policies and a fair county ordinance. NCCA believes in empowering community success through education, and connecting stakeholders with opportunities to participate and collaborate. NCCA has agreed to represent cannabis businesses and cultivators in Nevada County to the CalCannabis Appellations Working Group.

Oakland Cannabis Business Council

OCBC is a membership organization made up of cannabis business who have or are seeking a permit from the City of Oakland. The purpose of the OCBC is to protect and promote Oakland Cannabis through advocacy, community organizing, and market development. OCBC has agreed to represent cannabis businesses and cultivators in the City of Oakland to the CalCannabis Appellations Working Group.

Origins Council

Origins Council is a nonprofit education, research and policy advocacy organization that is dedicated to sustainable rural economic development within cannabis producing regions, and to establishing nationally and internationally recognized, legally defensible, standards-based, geographical indication systems for cannabis. The Mendocino Appellations Project is a fiscally sponsored project of Origins Council. Origins Council has agreed to represent cannabis businesses and cultivators in Mendocino County and the perspectives gained by consensus-building outreach throughout California to the CalCannabis Appellations Working Group.

Rural County Representatives of California

RCRC is an association of the state's 36 rural/low-population counties, representing the elected county supervisors of those counties. Many of the RCRC member counties are very engaged in cannabis policy, for example Humboldt, Calaveras, and Nevada Counties. RCRC has agreed to represent rural county municipalities to the CalCannabis Appellations Working Group.

Sierra County Growers Association

SCGA is a non-partisan, community-based group that organized to educate, connect and advocate for patient, cultivator and community rights and responsibilities in Sierra County. SCGA works cooperatively with all individuals, businesses, and regulatory bodies to promote reasonable environmental, social and economic standards, helping cultivators within the community to participate and thrive responsibly.

Silicon Valley Cannabis Alliance

SVCA was founded out of the need for regional collaboration at the local level. A vibrant cannabis industry in the Silicon Valley can be a force to be reckoned with. As the industry's only Silicon Valley trade organization, SVCA works every day to ensure their business sector is represented in a professional and coordinated way. SVCA is focused on growing the regional legal cannabis industry, including businesses in Santa Clara, San Benito and San Mateo Counties. SVCA has agreed to represent cannabis businesses and cultivators in the Silicon Valley region to the CalCannabis Appellations Working Group.

CalCannabis Appellations Working Group - Organizations Invited to Participate

(All information was provided by the representative or published on the organization's website)

Sonoma Valley Cannabis Enthusiasts

SVCE exists to promote Sonoma Valley's distinctive and unique cannabis to residents of California and beyond. SVCE's goal is to highlight their local cannabis' remarkable terroir and to spotlight how Valley cannabis, properly grown, adds value to both the environment and the community. SVCE has agreed to represent cannabis businesses and cultivators in the Sonoma Valley region to the CalCannabis Appellations Working Group.

Southern California Coalition

SCC is a non profit advocacy group representing over 200 members from all license categories of the industry. SCC's mission is to ensure that local, state and federal legislation is inclusive, fair, and implemented in a responsible manner. SCC was instrumental in persuading the City of Los Angeles to abandon its policy of limited immunity and begin licensing cannabis businesses, has moved aggressively to protect the rights of the city's oldest non-retail cannabis businesses, and has played a major role in shaping cannabis policy in Los Angeles. SCC has agreed to represent cannabis businesses and cultivators in Los Angeles and the surrounding region to the CalCannabis Appellations Working Group.

Urban Counties of California

UCC was formed in 1991 to address the needs of California's high-population counties, which have over three fourths of the State's population and the overwhelming majority of the caseloads in the health, welfare, and justice areas. UCC enables the urban counties to pool and coordinate their efforts to pursue legislative action that reflects the needs of the State's most populous areas.

CalCannabis Appellations Working Group - Individuals Invited to Participate

Richard Mendelson

Richard Mendelson is a wine lawyer at Dickenson, Peatman & Fogarty in Napa. He also directs the Wine Law and Policy Program at UC Berkeley Law School and is a grapegrower and winemaker with a small family brand, Mendelson. He is the author of several books on wine: *From Demon to Darling: A Legal History of Wine in America* (2009), *Wine in America: Law and Policy* (2011), and *Appellation Napa Valley: Building and Protecting an American Treasure* (2016). He has a particular interest and expertise in geographical indications, including appellations of origin, for wine and other products in the U.S. and abroad. Richard has agreed to provide his subject matter expertise to the CalCannabis Appellations Working Group.

Ryan Stoa

Ryan Stoa is an Associate Professor of Law at Concordia University School of Law in Boise, Idaho. He is the author of *Craft Weed: Family Farming and the Future of the Marijuana Industry* (MIT Press, 2018), as well as numerous scholarly articles addressing cannabis agriculture. Professor Stoa's popular writing has appeared in *The Wall Street Journal*, *The New Republic*, *Salon*, *The Daily Beast*, *The Dow Jones MarketWatch*, and *The Conversation*, and his research has been featured in *Rolling Stone*, *Wired*, *The Verge*, and *Gizmodo*, among others. He can be contacted at www.ryanstoa.com. Ryan has agreed to provide his subject matter expertise to the CalCannabis Appellations Working Group.

Luke Zimmerman

Luke Zimmerman, Esq. LL.M is the founding and principal of The Law Office of Luke S. Zimmerman APC. His interest in international trade and investment law led him to study the effect of bi-lateral trade agreements on the harmonization of intellectual property standards. He assists entrepreneurs in the emerging cannabis industry and helps them to protect their intellectual property. Luke currently splits his time working with clients in California as well as nationally on trademark issues. Luke is also certified by Oaksterdam University, in both beginner and advanced courses, and has served as Professor of the Oaksterdam University course *Intellectual Property, Copyright Law, and Trademarking*. Luke has agreed to provide his subject matter expertise to the CalCannabis Appellations Working Group, and has also agreed to represent the National Cannabis Bar Association.

Spencer, Craig x5233

From: Tor McPartland <orangeguard@sbcglobal.net>
Sent: Tuesday, April 30, 2019 4:35 PM
To: Spencer, Craig x5233
Subject: Carmel Valley outdoor cannabis

Dear Craig

We spoke at the Cachagua Advisory committee meeting awhile ago.

I previously sent you some wording for contiguous properties with the same owner.

I wanted today to run an idea about canopy charges. When we spoke you said canopy in advance charges were voted in so couldn't be changed without another vote.

So what I suggest is to base canopy charges for outdoor not by the fence enclosure size but by the plant container size.

I heard it would cost \$500,000 to comply for 10,000 sq ft area to get started. I promise you none of the starving farmers can do that and so you continue to only support the money and exclude the people who care.

Also PG&E being a requirement again excludes the people the county damaged when they illegalized cannabis. Possibly the county should pay restitution to the damaged farmers so they can afford to start up again.

I know you have a heart, please try to give one to the county.

Sincerely

Tor McPartland

Trampa Canyon (Tularcitos Ridge)

831-915-9151

Spencer, Craig x5233

From: online gorton <online22@att.net>
Sent: Monday, April 29, 2019 10:53 AM
To: Swanson, Brandon xx5334; Spencer, Craig x5233
Subject: outdoor program

Hi guys, Thanks so much for all your work on this.

There are still a few big things that will make or break this program. If there is still time I would like to have a meeting with RMA. I might be able to bring you to a previous grow site so RMA can get idea of how we grow on the different types of land we live on.

The set backs for sure need to be different. Please consider what Medocino County offers as setbacks. It is much more realistic. See below:

The cultivation of cannabis in Mendocino County, in any amount or quantity by any entity, shall not be allowed in the following areas:

(1)

Within one thousand (1,000) feet of a youth-oriented facility, a school, or a park as defined herein that is in existence at the time a Permit is initially applied for.

(2)

Outdoors or using mixed light within one hundred (100) feet of any occupied legal residential structure located on a separate legal parcel; provided, however, that on January 1, 2020, this setback shall be increased to two hundred (200) feet for all Permit applications but shall not apply to renewals of Permits originally issued before that date.

(3)

Outdoors or using mixed light in a mobile home park as defined in Health and Safety Code Section 18214.1 within one hundred (100) feet of an occupied mobile home that is under separate ownership.

(4)

In any location where the cannabis plants are visible from the public right of way or publicly traveled private roads.

(5)

Outdoors or using mixed light within fifty (50) feet from any adjoining legal parcel under separate ownership or access easement (whichever is most restrictive); provided, however, that on January 1, 2020, this setback shall be increased to one hundred (100) feet for all Permit applications but shall not apply to renewals of Permits originally issued before that date.

We believe limiting the size of the canopy to 10,000 sq/ft will be hard for farmers to really create a viable business. There are many larger properties that can sustain a larger grow. It should be option for them.

Regarding Illegal dwellings: Mendocino County has been lenient and willing to work with property owners to get their structures properly permitted and up to date. And many of our farmers lost there homes in the Soberanes Fire and have not been able to rebuild. They should not be punished for this.

Thank you and please let me know what else we can do.

Online Gorton
Santa Lucia Farmers

Let The Sun Shine!