

To: The Planning Commission, Planning Department Staff
From: Luke Bruner
Re: Cannabis- Proposed Ordinance Policy Areas and Discussion Items
Date: June 1, 2017

Chairman, Honorable Commissioners,

This letter and public comment is to address CannaTourism, MicroBusinesses, and AgriTourism. I urge Your Commission to adopt the following starting policy point:

*Small farmers and property owners have a **right** to host tours and visits. The Planning Commission and the County have a **duty** to fairly and sensibly regulate the activity.

In the passing of the CCLUO, Your Commission adopted and ratified the policy position that pre-existing cultivation sites have fundamental differences from new cultivation sites, on the rational basis that bringing pre-existing non-compliant sites into compliance improves the environment, etc. This position has been vindicated in its adoption by multiple other jurisdictions, incorporation into the foundation of state policy, and ultimately approval by the Courts in the HuMMAP lawsuit.

In this matter Your Commission provided the State of California with the needed leadership to make the right decision. I believe it is important that this policy direction be continued.

CannaTourism & AgriTourism

The issues of CannaTourism and MicroBusiness are critically important to the future of Humboldt County, the livelihood of our rural residents, and the protection and preservation of our rural property rights.

Agri-Tourism is a multibillion dollar global industry. UC Davis' Cooperative Extension maintains a robust Small Farm Program, that advances the interests of specialty crop farmers, and educates them on Agri-Tourism. Four Agri-Tourism summits were hosted around the state. The Petaluma summit received significant media coverage

<http://sfp.ucdavis.edu/agritourism/summits2017/>

All their presentation files, PowerPoints, local case studies for each reason are all available at this link.

The Press Democrat wrote a headline story, *Sonoma County farm leaders look to build agritourism*:

<http://www.sonomanews.com/lifestyle/6876784-181/sonoma-county-farm-leaders-look>

Sonoma County's official tourism portal promotes and makes available small farm Agri-Tourism:

<http://www.sonomacounty.com/articles/agri-tourism-farm-tours-offered-throughout-sonoma-county>

It is the great desire of many, many community members to incorporate Agri-Tourism into their cannabis operations. This will be essential for allowing small farms to compete and survive in this changing era.

Just as Your Commission provided critically needed statewide leadership on the matter of pre-existing operations and environmental improvement, Your Commission can and should provide leadership on Agri-Tourism. Of particular importance is the matter of Tour Operation, as discussed under the Cannatourism heading:

*Allow tour operators, with a business license, and commitment to only travel to sites permitted to host visits by from [sic] the general public.

Local media articles have given incomplete accounts of a local entrepreneur denied a business license because he sought to engage in cannabis tourism. The issuing of businesses licenses is a matter outside Your Commission's purview, but permitting around the potential tour sites certainly is!

As stated in the introduction, I urge Your Commission to adopt the following starting policy point:

*Small farmers and property owners have a **right** to host tours and visits. The Planning Commission and the County have a **duty** to fairly and sensible regulate the activity.

MicroBusinesses

MicroBusiness are essential to Humboldt County's future. There is an incredible interrelationship between AgriTourism, CannaTourism, Bud & Breakfast's, and MicroBusinesses.

The MicroBusinesses will be a keystone of our AgriTourism future. This license type was expressly put into Prop 64 with Humboldt farmers in mind. I urge Your Commission to readily extend access to this license to these pre-existing operations.

The MicroBusiness license reflects the sorts of activities already occurring on these pre-existing farms, many family operations. One of Your Commission's ongoing policy goals is to 'on ramp' existing operations into compliance.

New operations should be treated differently in regards to MicroBusiness licenses, since the license reflects pre-existing activity. This is in keeping with Your Commission's previous policy leadership.

The essential elements of these MicroBusinesses are:

- *Cultivation
- *Extraction of one's own product, especially 'Bubble Hash' and most importantly '**Hot Rosin'**
- *Self-Distribution
- *On-Site Consumption
- *Direct to consumer sales
- *Lodging (Bed & Breakfast / Bud & Breakfast)

Here is what's key: not all MicroBusinesses will do all of these activities. Many of these likely MicroBusinesses are already in-process or permitted for cultivation. The zoning and permitting issues otherwise prevent these businesses from obtaining the necessary permission to engage in additional activities.

In creating MicroBusinesses licenses that encompass these activities, I urge your commission to treat pre-existing cultivation operations differently, with the recognition that may were already engaged in MicroBusiness activity. Further, this license type was created by the Prop 64 authors expressly for these businesses. Road regulations are especially important in these matters.

Thank you for your time and consideration.

Regards,

-Luke Bruner