



Richard Williams <richard.williams@lacity.org>

Fwd: Commercial Cannabis Location Restriction Ordinance at City Council 11/28/17

Raza Lawrence <raza@margolinlawrence.com>

Mon, Nov 27, 2017 at 4:11 PM

To: Richard.Williams@lacity.org

Cc: Allison Margolin <allison@margolinlawrence.com>, Lauren Estevez <lauren@margolinlawrence.com>

Dear City Council,

I am an attorney and my law office represents several clients who will be seeking to apply for licenses under Los Angeles' new commercial cannabis licensing system. We are writing with respect to Council File 14-0366-S4 and the proposed Commercial Cannabis Location Restriction Ordinance, which is scheduled for a hearing before the City Council on November 28, 2017 (tomorrow) at 10:00 a.m.

On November 20, 2017, the City Council Rules Committee proposed new location requirements in its Draft Commercial Cannabis Location Restrictions. Of particular concern to our clients, the Committee imposed a new requirement that all indoor cultivation of commercial cannabis (as well as all manufacturing, distribution, and testing) be conducted at least 600 feet away from all schools. Previously, there had been no requirement regarding the distance of indoor cultivation, manufacturing, distribution, or testing from any schools, and the buffer zone from schools applied only to retail sites. We urge the City Council to reject this new distance proposal.

First, the original Draft Commercial Cannabis Location Restrictions issued on June 8, 2017, included maps showing in which zones indoor cultivation, manufacturing distribution, and testing could be conducted, and did not include any restriction on distances from schools. Many individuals and businesses have made planning and investment decisions based on the initial maps, and could incur substantial financial losses, including lost jobs and tax revenues if their planned locations are now barred by the new distance requirement from schools.

Second, there is no credible argument that an indoor medical marijuana cultivation (or manufacturing distribution, or testing facility) would pose any danger or threat to a school that is within 600 feet. Cultivation of plants is an inherently peaceful activity, and no retail sales or dispensing of marijuana is permitted at indoor cultivation sites. In addition, various proposed regulations would prevent the odor or any other evidence of cannabis from being detected outside the buildings. Any rationale that would justify locating dispensaries or other retail sites far away from schools does not apply to other commercial cannabis activities.

Finally, the new proposed location requirement would substantially decrease the available locations within the City to cultivate commercial cannabis. A great number of schools are scattered throughout the City, leaving few areas that are far enough from schools in order to conduct commercial cannabis activities. As a result, many commercial cannabis operators may choose to operate in and pay their tax revenues to other jurisdictions, or participate in the black market, thereby avoiding all taxes and regulations.

Thank you for considering our input on this issue.

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From: Niall Huffman <niall.huffman@lacity.org>

Date: November 27, 2017 at 3:21:00 PM PST

To: Niall Huffman <niall.huffman@lacity.org>

Subject: Commercial Cannabis Location Restriction Ordinance at City Council 11/28/17

Dear Stakeholders:

On Tuesday, November 28, 2017, the City Council is scheduled to consider the proposed Commercial Cannabis Location Restriction Ordinance.

The meeting is scheduled to begin at 10:00 a.m. in the Council Chamber (Room 340) of Los Angeles City Hall, [200 N Spring St, Los Angeles, CA 90012](#). All interested persons are invited to attend the meeting. An agenda is available at the following link: http://clkrep.lacity.org/granicus/2017/11282017_cal.htm The proposed ordinance is item No. 7 on the agenda.

Written comments on the proposed ordinance should be addressed directly to the City Council and sent via the City Clerk's office at Richard.Williams@lacity.org. Please reference Council File 14-0366-S4 in your correspondence.

Should you have any questions, please contact me at niall.huffman@lacity.org or [213-978-3405](tel:213-978-3405). Thank you for your continued interest.

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Niall H. Huffman, City Planning Associate
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Please be advised that I am out of the office every other Friday.



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Richard Williams <richard.williams@lacity.org>

Council File 14-0366-S4

Raymond Younan <ray@omholistichealth.com>
To: Richard.Williams@lacity.org

Mon, Nov 27, 2017 at 4:05 PM

Dear City Council,

On November 28, 2017 you are considering the proposed Commercial Cannabis Location Restriction Ordinance, Council File 14-0366-S4. On November 20, 2017, the Rules Committee recommended a new 600ft buffer for sensitive sites for all cannabis activity. Up until then, Los Angeles City Planning has revised this ordinance twice and had continued to recommended NO-distance requirements from sensitive sites for NON-Retail activity. This makes lots more sense. Especially for non-retail manufacturing and cultivating activity. The proposed allowed cultivation zones are very limited in Los Angeles, especially now that Rules Committee also recommended to eliminated complete zone like the previously allowed LAX zone, Alameda District zone, and Port of Los Angeles zone.

I urge you to consider the previous recommendation for Los Angeles

City Planning regarding the NO-distance requirement for NON-Retail cannabis activity.

Dr. Raymond Younan