



Richard Williams <richard.williams@lacity.org>

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## Public Comment Cannabis Location Ordinance

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Lauren Estevez <lauren@margolinlawrence.com>

Mon, Dec 4, 2017 at 9:08 AM

To: "richard.williams@lacity.org" <richard.williams@lacity.org>

Cc: Allison Margolin <allison@margolinlawrence.com>, Raza Lawrence <raza@margolinlawrence.com>

**Mr. Williams,**

**Please find below a public comment for today's City Council meeting.**

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**Margolin & Lawrence Law Firm**

**Public Comment**

**Commercial Cannabis Location Ordinance**

**December 4, 2017**

**Dear City Council,**

**We are a law firm that represents clients who will be applying for licenses under Los Angeles' new commercial cannabis licensing system. We are writing with respect to the proposed Commercial Cannabis Location Restriction Ordinance, which is scheduled for a hearing before the City Council on December 4, 2017 (today) 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. Moreover, the state law requiring a buffer from schools allows for local jurisdictions to regulate**

**differently. 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 draft 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.**

**Margolin & Lawrence Law Firm  
Allison Margolin, Esq.**

## J. Raza Lawrence, Esq.

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Lauren Estevez  
Associate, Margolin & Lawrence  
Margolinlawrence.com  
[8484 Wilshire Blvd., Ste. 440](#)  
[Beverly Hills, CA 90211](#)  
[lauren@margolinlawrence.com](mailto:lauren@margolinlawrence.com)  
(c) [617-945-8032](#) | (o) [323-653-9700](#)

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