

CITY OF LOS ANGELES

CALIFORNIA

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SUN VALLEY AREA NEIGHBORHOOD COUNCIL

November 20, 2017

City Council members

Re: CF 14-0366-S5

Council Members: Below comments are addressed to the Revised Draft Requirements for Commercial Cannabis Activity in the City of Los Angeles 9/22/17.

ITEMS LISTED UNDER: Commercial Cannabis Activity Application Requirements

General

Regarding Item 15 on page 15 –We agree with Paul Krekorian's motion of Oct 31 2017 **WITH THE MODIFICATIONS BELOW:**

- 1) REQUEST that the City Attorney's draft ordinance pursuant to this item should amend Commercial Cannabis Activity Application Requirements, General number 15 to include the provision that 30 percent of the workforce of ~~all regular contractors~~ hired shall be residents of the City of Los Angeles.

Further to this item The Sun Valley Area Neighborhood Council believes that the workforce for all cannabis employees shall consist of members classified as Employees , and NOT independent Contractors as these terms are known by the Labor Board

Regarding Security item 21 on pg. 15- We are concerned that there are no armed guards required on the premises during opening hours.

The alarm system in all facilities needs to be tied to the Police Department or a security service that can respond in less than 10 minutes.

All cannabis businesses must employ a security service that will drive by the business repeatedly during the hours the building is not open or employees are on site.

During hours that the business is not open we want no Lighted Signage.

Security lighting shall be the only illumination.

Page 16 (item 26) - **please see attachment A** regarding our proposal for community benefit trust fund for the neighborhood councils.

Page 17 (item 2) - Penalty for conviction for illegal volatile cannabis manufacturing should be no less than 10 years.

Page 22 (Item 2 Signage) - Violation type should be moderate. This is a Quality of Life issue for residents.

Page 23 (Item 20) - A question on the number of loitering signs and the size of the signs.

Page 24 (Item 30) – Absolutely no barbed or razor wire can be used on the perimeter of the property. This is a Quality of Life issue for those living in the neighborhood. These facilities should not look like concentration camps. Violation type should be moderate.

Page 26 (Item 4) – Retailers may only sell cannabis during the hours of 9 am to 9 pm (Pacific Time). The businesses should not be allowed to open before school children are in classes. They should not have to pass open Cannabis Stores on their way to school. Also, cannabis is now being sold as a recreational pursuit and the assumption is most people will be using it after work after 6 pm and they should not need to make purchases before going to work. Our concern is they may now be using it during working hours.

Page 31 (Item 12 Deliveries) – A delivery employee of a business shall only be allowed to travel from the business premises to three (3) delivery addresses before returning to the business premises. Our concern is if the delivery truck is carrying more than three (3) cannabis deliveries there may be an increased number of high-jacking of delivery vehicles. The delivery employee shall not be able to carry more than \$1500.00 of Cannabis product.

Only authorized employees of the delivery company can be inside the vehicle.

As there are no buffer requirements for these types of business they should only be allowed to deliver within a radius of 10 miles and not outside the boundaries of the city of Los Angeles.

Page 33 (Item 13) – Indoor cultivation types of all sizes shall maximize the number of solar panels used for power on site as well as making sure that wiring in the neighborhood for the grid is of a sufficient size that there will not be an increase in blackouts from power failures. The power company may need to have a larger number of spare transformers in stock for replacement.

Additionally, there should be a two-tier system for cost of water in this drought stricken area.

Is there any chance that the water used for irrigation can get into our sewer system and cause contamination problems for recycling.

Page 35 (Item 15) – Testing businesses should notify the department within twenty four hours of discovering an unexplained loss of **3%** or more of inventory of unpackaged and unused harvest-batch samples.

Page 36 & 37 – If there are violations of any of the items on the inspection pages, what is the violation type? Moderate or serious?

Page 39 – What are the qualifications of a hearing officer for an administrative hearing?

OTHER GENERAL CONCERNS:

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All properties used for cannabis business must be in character with the neighborhood. No buildings painted pea green and/or black. Buildings should be painted colors similar to other buildings in the neighborhood. We currently have 2 violations of this in our neighborhood.

Regulation of Edibles: Los Angeles County Health Department needs to be part of regulating these businesses.

Enforcement: In an earlier document there was language specifying that there would be 65 Police officers enforcing this ordinance. That number does not seem to be adequate to oversee an area the size of the City of Los Angeles. We need to allocate a sufficient budget for the number of police personnel and equipment necessary to do this job.

Any cannabis business that has two licenses, one for medical cannabis and one for recreational cannabis, must have two separate and distinct entrances and be completely segregated from each other.

Parking for Employees – We are told that cultivation businesses may have up to 25 employees. What requirements are in place to supply these employees with parking?
Customers of retail businesses should be able to park on site. If a cannabis business has two licenses, one for medical cannabis and one for recreational cannabis, they must have 3 ADA parking sites.

No consumption of cannabis on any licensed cannabis location.

Additionally, we heartily support Councilman Krekorian’s motions from October 31st which state:

I MOVE that the report of the Rules, Elections and Intergovernmental Relations Committee, relative to establishing a regulatory framework for commercial cannabis activity, and other cannabis related issues, in the City of Los Angeles, CF 14-0366-S4, CPC-2017-2260-CA BE AMENDED to include the following recommendations to mirror the State of Colorado provisions regarding the production of Cannabis edibles:

1. REQUEST that the City Attorney’s draft ordinance pursuant to this item should prohibit the production and sale of marijuana products that are in the distinct shape of a human, animal, or fruit, or a shape that bears the likeness or contains the characteristics of a realistic or fictional human, animal, or fruit, including artistic, caricature, or cartoon renderings.

2. Request that the City Attorney’s draft ordinance pursuant to this item should require Edible Infused Products to be marked, stamped, or otherwise imprinted with the Universal Symbol- a diamond enclosing the notations “! THC” or “! THCM” directly on the Infused Product- in a manner to cause the Universal Symbol to be distinguishable and easily recognizable on at least one side of the product; be centered either horizontally or vertically on the Product; the height and width of the Universal Symbol shall be of a size that is at least 25% of the product, but not less than ¾ inch by ¾ inch.
3. REQUEST that the City Attorney’s draft ordinance pursuant to this item should limit edibles to 100-miligram capacity on THC per package in infused products, separated into 10-miligram servings.
4. REQUEST that the City Attorney’s draft ordinance pursuant to this item should include a prohibition or regulation of additives to any retail marijuana product, including but not limited to those that are toxic, designed to make the product addictive, designed to make the product more appealing to children, or misleading to consumer.

Motion by: Paul Krekorian (Councilmember, 2nd District)

Additional motion: Motion by: Paul Krekorian (Councilmember 2nd District)

I MOVE that the report of the Rules, Elections and Intergovernmental Relations Committee, relative to establishing a regulatory framework for commercial cannabis activity, and other cannabis related issues, in the City of Los Angeles, CF 14-0366-S4, CPC-2017-2260-CA BE AMENDED to include the following recommendations:

1. Request that the City Attorney’s draft pursuant to this item should expand the definition of “Alcoholism or Drug Abuse Recovery or Treatment Facility” to include, “Permanent Supportive Housing Developments where services are provided on site.”

Additional motion: Motion by: Paul Krekorian (Councilmember 2nd District)

REQUEST that the City Attorney’s draft ordinance pursuant to this item should authorize the Department of Cannabis Regulation to begin issuing TYPE 8 Testing License during the time that they are issuing the Proposition M Priority license.

Additional motion: Motion by: Paul Krekorian (Councilmember 2nd District)

Request that the City Attorney’s draft ordinance pursuant to this item should amend the proposed Delivery for Retailer Commercial Cannabis Activity Requirements to remove “Contractors and vendors are allowed to apply for Delivery for Retailer Commercial Cannabis Activity as third-party delivery services if allowed by the State of California” and replace it with the requirement that all deliveries shall be done by employees of licensed Commercial Cannabis cultivator, retailer, micro business, or manufactory with a physical address in the City of Los Angeles.

Additional motion: Motion by: Paul Krekorian (Councilmember 2nd District)

SUN VALLEY AREA NEIGHBORHOOD COUNCIL

Re: CF 14-0366-S5

Requesting a Neighborhood Council Community Benefits Fund to be administered by the Department of Neighborhood Empowerment (DONE) November 20, 2017

The SUN VALLEY Area NC (SVANC) respectfully requests that those Neighborhood Councils that are impacted by Commercial Cannabis activity within their boundaries have a Community Benefits Trust Fund set up to receive resources from each licensed cannabis business active in their boundaries. Ideally, resources from these licensed businesses would be deposited into separate interest bearing accounts, one per each affected Neighborhood Council, on a bi-annual basis. These accounts would be held by the City Clerk's office, and the funds would be managed by the Department of Neighborhood Empowerment. Neighborhood Councils would be able to draw on these accounts for expenditures related to:

- Large Beautification projects such as developing landscaping on Medians in their boundaries and maintaining the Medians.
- To hire planning experts to educate the Neighborhood Council about Community Plans in General and for Sun Valley specifically, THE SUN VALLEY –LA TUNA CANYON COMMUNITY PLAN, which will be renewed in the next two years.
- Outreach for upcoming Neighborhood Council elections and all other outreach efforts.
- Publish a monthly newsletter as Outreach. Possible 6 mailings per year to stakeholders.
- Graffiti removal and Bulky item removal.
- Purchase of moveable Security Cameras to place in areas where high levels of Waste Dumping and Graffiti occur.
- Purchase and placement of lighting in high crime areas
- Hire experts in Traffic studies to study high impact traffic intersections in Sun Valley where traffic signals or left turn lights are needed.
- Office Rental, Translation Expenses, Clerical Expenses.
- Neighborhood Council Events Such as The Fourth of July , Memorial Day, Earth Day, Veterans Day, etc. (Decorate public areas with Flags)
- To present Workshops at the Sun Valley Library or Sun Valley Parks, such as Literacy for adults, Programs to teach Green Card holders Civics and other related training to pass their Citizenship tests. Also tutoring for school children and Senior's Programs
- To present Educational Presentations in conjunction with our local parks in such fields as art and astronomy, etc.

These are items that we don't normally have budgets for and we could be more effective in serving our Neighborhoods if we had access to these funds directly for each individual Neighborhood Council.

THIS IS NOT AN EXHAUSTIVE LIST