



City Clerk Council and Public Services <clerk.cps@lacity.org>

Fwd: LA Delivery Alliance Response to DCR Letter of Recommendation

Gloria Pinon <gloria.pinon@lacity.org>

Tue, Feb 26, 2019 at 2:38 PM

To: Clerk - Public Use - Clerk Council and Public Services <Clerk.CPS@lacity.org>

----- Forwarded message -----

From: **Michelle Garakian** <michelle.garakian@lacity.org>

Date: Tue, Feb 26, 2019 at 2:38 PM

Subject: Re: LA Delivery Alliance Response to DCR Letter of Recommendation

To: Zach <zach@goddessdelivers.com>

Cc: Cat Packer <cat.packer@lacity.org>, Alexander Freedman <alexander.freedman@lacity.org>, Adam Spiker <Adam@spikerconsultinggroup.com>, cityclerk@lacity.org <cityclerk@lacity.org>, rob.katherman@lacity.org <rob.katherman@lacity.org>

Thank you, Zack. We'll take into consideration for the further analysis requested by the Committee. In the meantime, feel free to upload your letter to the CF file by replying all to the clerk cc'ed here Andrew Choi.

Best,
Michelle



CITY OF LOS ANGELES DEPARTMENT OF
**CANNABIS
REGULATION**

Michelle Garakian
Assistant Executive Director
Department of Cannabis Regulation
213-978-0738
City of Los Angeles

On Tue, Feb 26, 2019 at 10:57 AM Zach <zach@goddessdelivers.com> wrote:

Ms. Cat Packer
Executive Director & General Manager Department of Cannabis Regulation **221 N. Figueroa Street**
Los Angeles, CA 90012

Re: DCR Report Dated February 8, 2019 Section No. C (1) Page 6 Expedited Licensing for a Delivery Service Pilot Program

Dear Ms. Packer:

The Los Angeles Delivery Alliance strongly supports any system that allows businesses already following state laws and acting in compliance to the best of their abilities, to go through pre-inspection and then be allowed to operate during the pendency of their application. Our organization is pleased that the Department of Cannabis Regulation (the DCR) has proposed this for delivery operations.

However, the pilot program proposed in Section (C)(1) of the DCR Report, while appreciated, is too narrow to accommodate the City's immediate need for delivery services. As Americans for Safe Access has pointed out, patients who are homebound face a brutal choice: continue to exist with pain or other unpleasant symptoms medical cannabis alleviates or violate both state and local laws by accessing a delivery service. Through no fault of the department, delivery service licensing has been delayed. Patients are suffering, and small delivery services are shutting down never to re-open. I think a more appropriate option would be closer to Section (C)(3) but for non-storefront retailers to become pre-approved and continue operations while the DCR works to fully license these already existing delivery operators.

We need options that expand the ways that delivery operators can quickly become licensed, as EMMDs have not been able to fill the gaps while undergoing their own licensing and compliance changes. The pilot program needs to be expanded so that there are enough legal businesses to serve the Los Angeles Community. Delivery services are wonderful businesses for social equity ownership, and our organization has, from the beginning, supported the City's Social Equity Program. Our organization

understands that the limited nature of the pilot program is due to staffing limitations the Department is currently experiencing. There are businesses which could supply expert staff to temporarily fill this need and help expedite the processing of applications.

The number of good operators that have already closed is huge. Criminal enterprises that never intend to become licensed continue to thrive, while those that desperately want to act compliantly have no options. Those who followed best practices, served the medical market exclusively and paid any taxes they were allowed to pay (the City of Los Angeles only allows those with a license to pay City taxes) while waiting patiently for licensure have bankrupted themselves foreclosing many opportunities for their social equity partners.

Our organization wants to support the DCR in its work to expand licensing, particularly relating to solutions that could expedite the licensing of pre-existing delivery operators. I am happy to discuss further; I can be reached at (323) 363 6062 or zach@goddessdelivers.com.

Sincerely,

Zachary Pitts
Director
Los Angeles Delivery Alliance
and
President
California Cannabis Delivery Alliance