



California State Association of Counties



Rural County Representatives of
California



Urban Counties Caucus

September 9, 2015

The Honorable Kevin de Leon
President Pro Tempore
California State Senate
State Capitol, Room 205
Sacramento, CA 95814

The Honorable Toni Atkins
Speaker of the Assembly
California State Assembly
State Capitol, Room 219
Sacramento, CA 95814

RE: Medical Cannabis Legislation – Request for Passage in 2015

Dear Mr. President and Madame Speaker:

On behalf of the California State Association of Counties (CSAC), the Urban Counties Caucus (UCC), and the Rural County Representatives of California (RCRC), we respectfully urge you to facilitate an agreement between the two houses of the Legislature regarding the passage of medical cannabis legislation this year.

The issue of medical cannabis regulation is of great importance to California's counties. In the last several years, there has been a dramatic proliferation of marijuana cultivation and dispensaries, and the scale and volume of individual grow sites has enlarged. CSAC, UCC and RCRC are united in our views on the necessity for an appropriate statewide licensing and regulatory framework due to this ever growing proliferation.

Counties also believe that any medical cannabis regulatory structure must contain several components to address:

- (1) Unconditional protection of local control, as well as the legal force of local ordinances and local police powers, including the requirement for state and local licensing of cannabis businesses;
- (2) A well-defined set of provisions on suitability for state licensing, a framework for the vetting of license applicants, and elimination of potential loopholes in the name of patient privacy;

- (3) Protection of public health by establishing health and safety standards, backed up and enforced by a framework for product testing and a protocol for certifying testing laboratories;
- (4) Additional provisions to ensure public safety, including criminal background checks, and security standards at physical businesses;
- (5) Additional licensing provisions that encompass third party entities (i.e. technology platforms) involved in the delivery of cannabis to patients;
- (6) Explicit taxing authority for counties;
- (7) State minimum standards in the areas of health and safety, security standards, testing standards, and worker protections;
- (8) Prohibit vertical integration of licensees; however, in certain circumstances, there should be limited exceptions and flexibility in holding multiple licenses;
- (9) Ensure compliance with environmental laws and regulations and an enforcement mechanism that includes funding for state and local agencies.

All of these components are essential to a workable framework that will address the wide range of environmental, land-use, and health and safety issues that our counties are currently experiencing.

For these reasons, we urge you to take the steps to ensure that both houses of the Legislature enact a medical cannabis regulatory framework before the adjournment of Session later this week.

Should you have any questions on our position, please contact Jolena Voorhis with UCC at (916) 327-7531, Karen A. Keene with CSAC at (916) 327-7500, or Paul A. Smith with RCRC at (916) 447-4806.

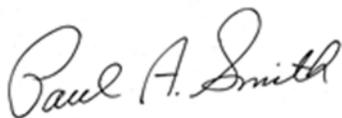
Sincerely,



Karen A. Keene
Senior Legislative Representative
CSAC



Jolena Voorhis
Executive Director
UCC



Paul A. Smith
Legislative Advocate
RCRC

Cc: Members of the Senate
Member of the Assembly
Graciela Castillo-Krings, Governor's Office