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County of Lake  
Board of Supervisors  
255 N. Forbes Street  
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Supervisors:

I am writing in response to the public hearing on 12, December, 2017 to address both the Urgency Ordinance and the long term solution to integrating cannabis into the Lake County economy. As cannabis transitions into a commodity agricultural crop, the investments are growing leaps and bounds worldwide (\$7.7 billion market 2017, forecasted to be \$31.4 billion in 2021). There is no reason we should not all benefit in a way which respects the land and the heritage of Lake County.



I have owned the Benmore Valley for the last 12 years. The Benmore Valley is a unique place: a hidden treasure, representing the unmatched beauty and potential of Lake County, a remote, dead-end, mountaintop valley, its own watershed, with nothing above it, and no neighbors to speak of. We have a rich history in agriculture and hospitality, which dates back to its namesake, Benjamin Moore, a cattle rustler, and beyond to the Native Americans (there are several archeological sites, including a year-round village). Currently, the Benmore Valley Ranch is a diversified environment including cattle grazing and husbandry, vineyards, orchards, families raising children, and retreat operations.

In the last decade special attention has been paid to restoring the land back to its natural state, including voluntarily adding deed restrictions (forest and agricultural preserves) to ensure that an

amazing piece of Lake County's natural history remains unmolested for generations to come. The work included removing over 100 acres of commercial vineyard (where they previous owners sprayed Roundup at the top of the watershed, ultimately draining down to Scotts Creek). Current operations are clean, with respect for the land, and to those in the watersheds below. The riparian corridor down the center of the valley has been restored and infrastructure for rotational pastures constructed with the help of an NRCS grant. We take our responsibility as stewards of the land seriously and honor a rich agricultural and cultural history.

As some of you know, I have been working hard for the last two years to help set cannabis policy around integration into the industry with specific regard to economic development for Lake County. I've had Bob, Mireya, and Tina up to the Benmore Valley for multiple site visits, conducted two tours of the Cannacraft facility in Santa Rosa, one of the largest cannabis firms in California and a business partner, and I sat on the Technical Advisory Committee with Bob and Mireya. With the enormous time and effort I have made to take initiative in helping bring the County officials up to speed with the cannabis industry, I feel it would be unfair to come up with an ordinance, urgency or permanent, that will not allow me to apply for state licenses in 2018.

I have an application on file (Application Number 400117) with the State Water Board, but, do not have a permit issued. We have been waiting on the County to finalize the rules so we can complete our site plan, which is required to get the discharge permit for 2018.

During the public hearing there was talk from the public that the only people ready to proceed in compliance in 2018 were those who had Water Board Discharge Permits issued. That is not the case, as we have our application on file and therefore will be in compliance; we have been waiting on the County to finalize the rules before completing our site plan. For our site, we are proposing 4 acres of Cannabis cultivation in the footprint of a 240 acre vineyard that was discharging 9000 gallons of tainted water per minute! The discharge from the 4 acres of organic cannabis is marginal and the Water Board Permit is an almost insignificant part of the entire process.

The idea of using the Water Board Permit as a metric for "good" vs "bad" cultivators to set policy around eligibility to submit an application does not make sense and may in fact exclude some people who have made significant investments of time to help facilitate the process. I request that if you decide to have a Water Board Permit be criteria for eligibility in an Urgency Ordinance that anyone with an application currently on file with the State Water Board shall be allowed to apply.

There was an implication that people would be out of compliance on 1 January, 2018, if you do not act before then. I believe that is hyperbole, and that the only issue would be that it may affect the timeline for applying for a state license. It is not clear there is a need for an Urgency Ordinance before the end of the year, as the state is allowing a 6 month grace period before the County permits need to be finalized. While the issue is urgent, there is no hard year-end deadline. We should take the time to craft a functional and fair policy.

Our investment group is ready to go, waiting on the sidelines for Lake County to finalize the rules so we can proceed with a great project, in a remote location, with minimal environmental impact, that will

generate significant tax revenue. If we cannot give them something to work with, they will relocate to other counties.

Thanks for your consideration and I look forward to working with you.

Sincerely,

Robert Adelman

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