

From: [CDD User](#)
To: [Munoz, Cristal](#)
Subject: FW: Public Comments Submission On Cannabis Ordinance Clarification for May 20 2021 City Council Session
Date: Tuesday, May 18, 2021 4:39:47 PM

Cristal,

Forwarding a public comment for the 5/20 CC meeting on the proposed Cannabis Ordinance.

Thanks,

Sarah Peters

Sarah Peters
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From: Mary Rose Kaczorowski <mrkaczorowski@gmail.com>
Sent: Tuesday, May 18, 2021 3:36 PM
To: Lemos, June <jlemos@fortbragg.com>
Cc: Norvell, Bernie <Bnorvell2@fortbragg.com>; Miller, Tabatha <TMiller@fortbragg.com>; Peters, Lindy <LPeters2@fortbragg.com>; Gonzalez, Joanna <JGonzalez@fortbragg.com>; Marcial Cordon <marcialcordon@gmail.com>; Morsell-Haye, Jessica <Jmorsellhay@fortbragg.com>; Albin-Smith, Tess <Talbinsmith@fortbragg.com>; Dan Gjerde <gjerde@mendocinocounty.org>; CDD User <CDD@fortbragg.com>
Subject: Public Comments Submission On Cannabis Ordinance Clarification for May 20 2021 City Council Session

Dear Mayor and City Council.

The proposed Cannabis Ordinance that allows:
"Accessory uses may include activities that require multiple State cannabis licenses, including, but not limited to, manufacturing, distribution, cultivation and/or processing. In no instance shall cannabis manufacturing using volatile solvents be allowable as uses accessory to cannabis retail uses." **belongs in an industrial area of the City of Ft. Bragg and not in the heart of downtown or the**

Central Business District.

Please read the following and keep cannabis manufacturing, cultivation and/or processing outside of the Downtown, outside of the CBD and away from residential neighborhoods.

The City does not have the expertise nor is able to monitor or enforce safety for such operations, for cannabis operations employees or nearby businesses.

Cannabis Retail operations should not allow cannabis manufacturing, cultivation and/or processing as accessory uses.

This is a bad precedent. This ordinance is incompatible with what residents have envisioned for Fort Bragg's revitalization in many previous scoping sessions and design charrettes (collaborative effort used to create a detailed design or plan for specific goal or geographic area) done by the City of Fort Bragg.

Please Note: Since Cannabis is still illegal under Federal law- federal protections do not exist for cannabis employees.

Here are a few of the hazards:

1. **OSHA's [Hazard Communication Standard \(HazCom\)](#)**. This standard provides information on individual chemicals via labels and safety data sheets, including how to react to specific chemicals in the event of a fire and how and where to store chemicals and which pesticides and herbicides require workers to use respiratory protection. Each state may have their own or use OSHA guidelines.
2. **Electrical.** Cannabis extraction labs must be designed to local and federal building codes. The most common electrical hazard is when employees 'daisy chain' power strips together or attach one to the end of an extension cord. These are small but easily overlooked hazards, that

quickly become permanent fixtures and overloading electrical circuits are a common source of ignition.

3. **Machine Guarding.** Assembly lines in cannabis plants can cause accidents when the belt is moving quickly and a slip, trip or fall causes a body part to be crushed. The same applies when machinery doesn't have the proper guards or cutters and rotating parts are not properly engaged.
4. **Personal Protective Equipment (PPE).** Some cannabis growers employ UV lights in their work, which can be dangerous for employees with repeated exposure. To minimize the exposure, some growers offer workers special sunglasses.
5. **Slips, trips and falls.** The most common accident in any type of commercial or industrial production setting – slips, trips and falls – are usually preventable with good housekeeping. Remove clutter from the production space, including cardboard boxes used to move product. Often times, cannabis extraction operations will have a lot of water on the ground. When this is the case, boots may be worn to prevent falls.

Article from Chemistry World online

<https://www.chemistryworld.com/news/accidents-at-cannabis-cultivation-facilities-worry-industry-chemists/3009412.article>

Recent safety incidents at US cannabis cultivation facilities have caused concern at the American Chemical Society's (ACS) autumn meeting. 'I have a level of professional and personal concern about this new-born industry – while marijuana has been around a long time, at the industrial production level it is an infant,' stated [Neal Langerman](#), a safety consultant and founder of Advanced Chemical Safety in

California, during a session of the [256th American Chemical Society meeting in Boston](#), US on 20 August

From POLITICO

<https://www.politico.com/story/2019/02/18/marijuana-factories-explosions-safety-issues-1155850>

Federal safety and health standards do apply to marijuana companies, **but many are too small to fall under the jurisdiction of the Occupational Safety and Health Administration.** Since 1977, a rider that's included routinely in appropriations bills prevents the agency from inspecting farm operations with 10 employees or fewer.

States are facing a new danger as legal marijuana spreads across the country: Explosions and fires at cannabis factories are sending workers to the hospital with severe burns, revealing the nascent industry's lack of proper safety standards.

In the 33 states where the drug is legal for medical or recreational use, at least 10 fires or explosions have occurred in the past five years at facilities that extract hash oil used in edible products. Nearly all resulted in serious injuries for production-line staff.

The California Division of Occupational Safety and Health (Cal/OSHA) cited a marijuana producer for a workplace explosion in which an employee suffered burns. As the marijuana industry takes hold in states allowing recreational marijuana use, state agencies are taking steps to ensure compliance with worker safety and health standards.



ARTICLE FROM *EHS Daily Advisor* (Environment, Health, and Safety)

Enforcement and Inspection, Personnel Safety

Explosion and Injury at Marijuana Processor Leads to Citation

By Guy Burdick Jan 7, 2019 [Enforcement and Inspection, Personnel Safety](#)

[Marijuana grow operation](#)

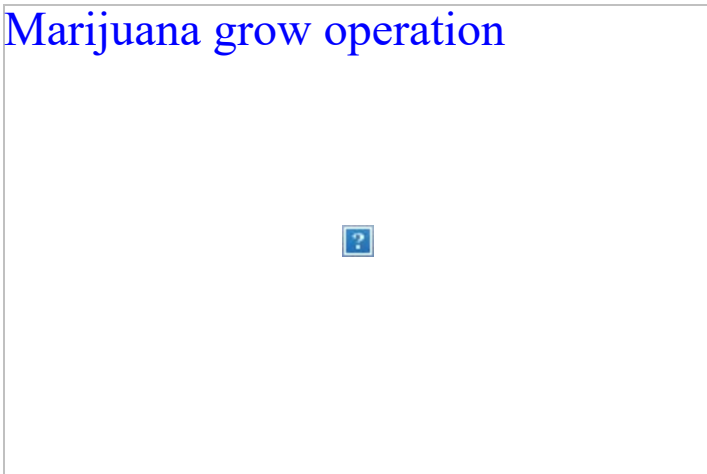


Photo: Canna Obscura / [Shutterstock.com](#)

An employee of the company was working alone June 19, 2018, inside a 128-square-foot portable storage container, using propane to extract oil from cannabis leaves.

The propane ignited, causing an explosion that badly burned the worker. He was hospitalized for several days following the incident.

Firefighters take 4 hours to extinguish fire at commercial structure housing marijuana grow operation in South L.A.: LAFD

KTLA NEWS <https://ktla.com/news/local-news/firefighters-battling-commercial-structure-fire-in-south-l-a/>

Posted: Apr 3, 2021 / 04:03 PM PDT / Updated: Apr 3, 2021 / 10:39 PM PDT

About 170 firefighters took four hours to extinguish a fire that largely destroyed commercial structures housing a marijuana grow operation in South Los Angeles Saturday afternoon, officials said.

The fire at 8730 Crocker St. in the Green Meadows neighborhood in South L.A. was first reported around 2:20 p.m. as an outside fire to the rear of a one-story commercial building, according to a Los Angeles Fire Department alert.

My Best Regards,

Mary Rose Kaczorowski, M.T.S.- Pacific School of Religion/Graduate Theological Union

<https://muckrack.com/mary-rose-kaczorowski>

How to pronounce my name? <https://www.youtube.com/watch?v=5Sik7LKjTY>

[linkedin.com/in/mrk2008](https://www.linkedin.com/in/mrk2008)

"Be calm, like a giant tree in a storm."



Fort Bragg City Council
416 N Franklin St.
Fort Bragg, CA 95437

May 18, 2021

Honorable Council,

The Mendocino Cannabis Alliance (MCA) is this county's premier trade association, representing over 125 members in all sectors of the legalized cannabis industry. MCA appreciates the efforts of the City of Fort Bragg's council members and staff to engage in fruitful discussions surrounding the city's purpose to "promote the health, safety, morals and general welfare of the residents and businesses within the city."

Please consider the following stakeholder input, recommendations and questions regarding the agenda items referenced.

1D

- We recommend the development of both the microbusiness permit AND further clarification of the accessory use definition so that small business owners may utilize the most appropriate path to licensure and success. (page 52)

- We recommend the following definitions
 - a. *“Microbusiness” means at least three of the following commercial cannabis activities: (1) cultivation of cannabis on an area 10,000 square feet or less, (2) distribution, (3) Manufacturing Level 1 (Non-Volatile), and (4) acting as a licensed retailer/dispensary (to include delivery only) “*

- We recommend defining each accessory use individually by square footage, not collectively.

- We recommend allowing the microbusiness license (as defined in this memo) in all areas where the proposed uses are allowed.

Thank you for your consideration of MCA's recommendations for a city ordinance that is safe and supportive of this nascent industry and its potential to help drive economic development in Fort Bragg.

We are available to discuss any of these items further at your convenience.

Sincerely,
Mendocino Cannabis Alliance