

**Note: 2 emails originating from the commenter were received. Some to SRCAA and some to Spokane Co. and forwarded to SRCAA resulting in duplication.**

**From:** Emily Reilly [mailto:info@actionnetwork.org]

**Sent:** Tuesday, November 28, 2017 6:09 PM

**To:** Public Comment

**Subject:** Comment for the record; proposed MJ SRCAA rules and fees

Margee Chambers,

There are 138 marijuana farms in Spokane County, that's 138 small businesses.

In 2016 these farmers in Spokane employed more than 1,100 individuals, generated more than \$62 million in gross revenue on less than 50 acres. The industry is still in its infancy and the farmers need to be able to reinvest and grow their businesses to remain competitive and over regulation significantly interferes with their ability to do so.

I've reviewed your recently proposed rules and fees for marijuana farms and am highly concerned about a number of aspects.

1. It is ridiculous that the clean air agency is classifying the monoterpenes released by cannabis as an air contaminant. SRCAA's own analysis of the odors associated with cannabis identified that alpha-pinene was the most prevalent monoterpene released. This is the same monoterpene released by pine trees. The "air contamination" you are referring to is similar in chemical make up to the "contamination" one might experience taking a hike through a forest filled with ponderosa pine trees.
2. The clean air agency should be working to reduce carbon emissions or other toxic emissions rather than concerning itself with the aroma produced by a plant.
3. Penalizing outdoor farmers for growing a plant outdoors is ridiculous and discriminatory.
4. Creating regulations that incentivize indoor cultivation conflicts with the Governor's direction that regulatory agencies adopt regulations that consider carbon impact, it also appears to conflict with the state clean air act which reads "In selecting air pollution control strategies state and local agencies shall support those strategies that lessen the negative environmental impact of the project on all environmental media, including air, water, and land." Not only do outdoor cannabis plants convert CO2 to oxygen and deposit carbon into the soil, outdoor cultivation has a significantly smaller overall carbon footprint compared to

indoor cultivation.

5. Installation of a significant amount of control equipment recommended or required by SRCAA will make it challenging for marijuana farmers to comply with state energy codes. Regulations that conflict with other regulations should be avoided as it's unfair to the small businesses caught in the middle.

6. It is a waste of agency resources to require all marijuana farmers to report to your agency, be inspected, and develop mitigation plans when most, more than 67% based on figures in your fact sheet are not associated with a single complaint.

7. The proposed rule to require marijuana farmers to report proprietary harvest schedules puts the safety and security of marijuana farmers at risk. Because SRCAA is subject to PRR that information can be made available to the public and can be leveraged by competing farms and/or individuals seeking to rob or burglarize a farmer at the ideal time. This provision must be removed.

8. I understand the agency has spent a large amount of money to inspect & visit marijuana farms over the last few years. It is my belief that it was irresponsible for the agency to engage in those activities prior to having regulations on the books granting them authority to do so.

9. The proposed fees are unduly burdensome. In comparing the initial registration fee plus the annual registration fee with the fiscal year 2016 median revenue for the various farm sizes some of the proposed fees amount to 7%-18% of the median gross revenue of a farm. This may very well be higher than the farmers profit considering the over-regulation and over-taxation the industry is already seeing.

The reality that the clean air agency, funded in part by tax payer's money would seek to force cultivation of a plant indoors is beyond disappointing to me. This is clearly an example of regulatory agency overreach and too much government in the private lives of individuals and businesses. Over-regulation only serves to stifle growth, scare off investment, and transfer opportunity away from small business owners. Please abandon these ill-conceived rules and let cannabis farmers farm without interference.

Emily Reilly

emilyjanereilly@gmail.com

10433 65th Ave S

Seattle, Washington 98178

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**Note: 2 emails originating from the commenter were received. Some to SRCAA and some to Spokane Co. and forwarded to SRCAA resulting in duplication.**

**From:** Sheila Durkoop [mailto:dsdurkoop@msn.com]  
**Sent:** Tuesday, November 28, 2017 7:01 PM  
**To:** Public Comment  
**Subject:** Comment for the record; proposed MJ SRCAA rules and fees

Margee Chambers,

There are 138 marijuana farms in Spokane County, that's 138 small businesses.

In 2016 these farmers in Spokane employed more than 1,100 individuals, generated more than \$62 million in gross revenue on less than 50 acres. The industry is still in its infancy and the farmers need to be able to reinvest and grow their businesses to remain competitive and over regulation significantly interferes with their ability to do so.

I've reviewed your recently proposed rules and fees for marijuana farms and am highly concerned about a number of aspects.

1. It is ridiculous that the clean air agency is classifying the monoterpenes released by cannabis as an air contaminant. SRCAA's own analysis of the odors associated with cannabis identified that alpha-pinene was the most prevalent monoterpene released. This is the same monoterpene released by pine trees. The "air contamination" you are referring to is similar in chemical make up to the "contamination" one might experience taking a hike through a forest filled with ponderosa pine trees.
2. The clean air agency should be working to reduce carbon emissions or other toxic emissions rather than concerning itself with the aroma produced by a plant.
3. Penalizing outdoor farmers for growing a plant outdoors is ridiculous and discriminatory.
4. Creating regulations that incentivize indoor cultivation conflicts with the Governor's direction that regulatory agencies adopt regulations that consider carbon impact, it also appears to conflict with the state clean air act which reads "In selecting air pollution control strategies state and local agencies shall support those strategies that lessen the negative environmental impact of the project on all environmental media, including air, water, and

land.” Not only do outdoor cannabis plants convert CO2 to oxygen and deposit carbon into the soil, outdoor cultivation has a significantly smaller overall carbon footprint compared to indoor cultivation.

5. Installation of a significant amount of control equipment recommended or required by SRCAA will make it challenging for marijuana farmers to comply with state energy codes. Regulations that conflict with other regulations should be avoided as it's unfair to the small businesses caught in the middle.

6. It is a waste of agency resources to require all marijuana farmers to report to your agency, be inspected, and develop mitigation plans when most, more than 67% based on figures in your fact sheet are not associated with a single complaint.

7. The proposed rule to require marijuana farmers to report proprietary harvest schedules puts the safety and security of marijuana farmers at risk. Because SRCAA is subject to PRR that information can be made available to the public and can be leveraged by competing farms and/or individuals seeking to rob or burglarize a farmer at the ideal time. This provision must be removed.

8. I understand the agency has spent a large amount of money to inspect & visit marijuana farms over the last few years. It is my belief that it was irresponsible for the agency to engage in those activities prior to having regulations on the books granting them authority to do so.

9. The proposed fees are unduly burdensome. In comparing the initial registration fee plus the annual registration fee with the fiscal year 2016 median revenue for the various farm sizes some of the proposed fees amount to 7%-18% of the median gross revenue of a farm. This may very well be higher than the farmers profit considering the over-regulation and over-taxation the industry is already seeing.

The reality that the clean air agency, funded in part by tax payer's money would seek to force cultivation of a plant indoors is beyond disappointing to me. This is clearly an example of regulatory agency overreach and too much government in the private lives of individuals and businesses. Over-regulation only serves to stifle growth, scare off investment, and transfer opportunity away from small business owners. Please abandon these ill-conceived rules and let cannabis farmers farm without interference.

Sheila Durkoop  
dsdurkoop@msn.com

4010 E 19th Ave  
Spokane, Washington 99223

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**Note: 2 emails originating from the commenter were received. Some to SRCAA and some to Spokane Co. and forwarded to SRCAA resulting in duplication.**

**From:** Dallas Durkoop [mailto:sun.dddurkoop@yahoo.com]  
**Sent:** Wednesday, November 29, 2017 12:12 AM  
**To:** Public Comment; afrench@spokanecounty.org; cnezat@ewu.edu; tbrateiii@gmail.com; rhiggins@spokanevalley.org; mayor@cityofmillwood.org  
**Subject:** Comment for the record; Proposed MJ SRCAA rules and fees

There are 138 marijuana farms in Spokane County, that is 138 small businesses. In 2016 these farmers in Spokane employed more than 1,100 individuals, generated more than \$62 million in gross revenues on less than 50 acres. The industry is still in its infancy and the farmers need to be able to reinvest and grow their businesses to remain competitive and over regulation significantly interferes with their ability to do so

I have reviewed your recently proposed zoning ordinance for marijuana farms and am concerned about many provisions set forth in it.

- 1) **I strongly oppose the county modifying the definition of agriculture to exclude marijuana cultivation.** Marijuana is a PLANT, cultivating cannabis most closely resembles agriculture. Washington L & I classify marijuana farm employees, as agriculture workers and the WSDA regulates the pesticides & fertilizers cannabis farmers can use. The county should NOT adapt prejudicial definitions.
- 2) **I oppose increasing the rear and side property line setbacks from 50' to 100'.** It is unreasonable to deprive property owners of the use of that much of their land for the purposes they desire. The reality is that most marijuana farmers have not had any complaints from their neighbors.
- 3) **I oppose the requirement for a CUP process for farms seeding permits for expansion or construction.** It is expensive and time consuming for both the farmer and the county.

Arcview Group estimates that the US marijuana industry will generate over \$21 billion by 2021. Nationwide legalization is inevitable, and I personally want to see our Washington State and the **Spokane County farmers** poised to lead the nation and bring that revenue and jobs to our county and state!

Also, a number concerning of aspects;

1. It is ridiculous that the clean air agency is classifying the monoterpenes released by cannabis as an air contaminant. SRCAA's own analysis of the odors associated with cannabis identified that alpha-pinene was the most prevalent monoterpene released. This is the same monoterpene released by pine trees. The "air contamination" you are referring to is similar in chemical make up to the "contamination" one might experience taking a hike through a forest filled with ponderosa pine trees.

2. The clean air agency should be working to reduce carbon emissions or other toxic emissions rather than concerning itself with the aroma produced by a plant. An aroma has not ever "harmed" anyone.

3. Penalizing outdoor farmers for growing a plant outdoors is ridiculous and discriminatory. Outdoor farmers require 80% less water, are environmentally helpful, ie less carbon emissions and sequesters CO2.

4. Creating regulations that incentivize indoor cultivation conflicts with the Governor's direction that regulatory agencies adopt regulations that consider carbon impact, it also appears to conflict with the state clean air act which reads "In selecting air pollution control strategies state and local agencies shall support those strategies that lessen the negative environmental impact of the project on all environmental media, including air, water, and land." Not only do outdoor cannabis plants convert CO2 to oxygen and deposit carbon into the soil, outdoor cultivation has a significantly smaller overall carbon footprint compared to indoor cultivation. **Indoor farmers have enormous carbon foot print, environmentally harmful, wasteful water demands and have a huge strain on the power grid.**

5. Installation of a significant amount of control equipment recommended or required by SRCAA will make it challenging for marijuana farmers to comply with state energy codes. Regulations that conflict with other regulations should be avoided as it's unfair to the small businesses caught in the middle.

6. It is a waste of agency resources to require all marijuana farmers to report to your agency, be inspected, and develop mitigation plans when most, more than 67% based on figures in your fact sheet are not associated with a single complaint.

7. The proposed rule to require marijuana farmers to report proprietary harvest schedules puts the safety and security of marijuana farmers at risk. Because SRCAA is subject to PRR that information can be made available to the public and can be leveraged by competing farms and/or individuals seeking to rob or burglarize a farmer at the ideal time. **This provision must be removed.**

8. I understand the agency has spent a large amount of money to inspect & visit marijuana farms over the last few years. It is my belief that it was irresponsible for the agency to engage in those activities prior to having regulations on the books granting them authority to do so.

9. The proposed fees are unduly burdensome. In comparing the initial registration fee plus the annual registration fee with the fiscal year 2016 median revenue for the various farm sizes some of the proposed fees amount to 7%-18% of the median gross revenue of a farm. This may very well be higher than the farmers profit considering the over-regulation and over-taxation the industry is already seeing.

10. -74% of the farms in Spokane have had zero complaints.

-75% of the complaints are associated with only 3 farms, it is unreasonable to assess high fees on all farmers as a result of the poor relationship a few farmers have with their neighbors

11. In analyzing my own farm's finances, the proposed fees would be 95 % of the gross income by farm generated so far in 2017. (see below fee schedule to calculate) Or if you are a retailer this tax will increase costs as the farmers will increase wholesale cost to you and then it will increase the costs to your consumers.

The reality that the clean air agency, funded in part by tax payer's money would seek to force cultivation of a plant indoors is beyond disappointing to me. This is clearly an example of regulatory agency overreach and too much government in the private lives of individuals and businesses. Over-regulation only serves to stifle growth, scare off investment, and transfer opportunity away from small business owners. Please abandon these ill-conceived rules and let cannabis farmers farm without interference.

Thank You,

Dallas Durkoop

Still Urban Nursery

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**Note: 3 emails originating from the commenter were received. Some to SRCAA and some to Spokane Co. and forwarded to SRCAA resulting in duplication.**

**Email regarding SRCAA rulemaking:**

**From:** Alex Johnson [mailto:info@actionnetwork.org]

**Sent:** Thursday, November 30, 2017 6:51 AM

**To:** Public Comment

**Subject:** Comment for the record; proposed MJ SRCAA rules and fees

Margee Chambers,

There are 138 marijuana farms in Spokane County, that's 138 small businesses.

In 2016 these farmers in Spokane employed more than 1,100 individuals, generated more than \$62 million in gross revenue on less than 50 acres. The industry is still in its infancy and the farmers need to be able to reinvest and grow their businesses to remain competitive and over regulation significantly interferes with their ability to do so.

I've reviewed your recently proposed rules and fees for marijuana farms and am highly concerned about a number of aspects.

1. It is ridiculous that the clean air agency is classifying the monoterpenes released by cannabis as an air contaminant. SRCAA's own analysis of the odors associated with cannabis identified that alpha-pinene was the most prevalent monoterpene released. This is

the same monoterpene released by pine trees. The "air contamination" you are referring to is similar in chemical make up to the "contamination" one might experience taking a hike through a forest filled with ponderosa pine trees.

2. The clean air agency should be working to reduce carbon emissions or other toxic emissions rather than concerning itself with the aroma produced by a plant.
3. Penalizing outdoor farmers for growing a plant outdoors is ridiculous and discriminatory.
4. Creating regulations that incentivize indoor cultivation conflicts with the Governor's direction that regulatory agencies adopt regulations that consider carbon impact, it also appears to conflict with the state clean air act which reads "In selecting air pollution control strategies state and local agencies shall support those strategies that lessen the negative environmental impact of the project on all environmental media, including air, water, and land." Not only do outdoor cannabis plants convert CO<sub>2</sub> to oxygen and deposit carbon into the soil, outdoor cultivation has a significantly smaller overall carbon footprint compared to indoor cultivation.
5. Installation of a significant amount of control equipment recommended or required by SRCAA will make it challenging for marijuana farmers to comply with state energy codes. Regulations that conflict with other regulations should be avoided as it's unfair to the small businesses caught in the middle.
6. It is a waste of agency resources to require all marijuana farmers to report to your agency, be inspected, and develop mitigation plans when most, more than 67% based on figures in your fact sheet are not associated with a single complaint.
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8. I understand the agency has spent a large amount of money to inspect & visit marijuana farms over the last few years. It is my belief that it was irresponsible for the agency to engage in those activities prior to having regulations on the books granting them authority to do so.
9. The proposed fees are unduly burdensome. In comparing the initial registration fee plus the annual registration fee with the fiscal year 2016 median revenue for the various farm sizes some of the proposed fees amount to 7%-18% of the median gross revenue of a farm.

This may very well be higher than the farmers profit considering the over-regulation and over-taxation the industry is already seeing.

The reality that the clean air agency, funded in part by tax payer's money would seek to force cultivation of a plant indoors is beyond disappointing to me. This is clearly an example of regulatory agency overreach and too much government in the private lives of individuals and businesses. Over-regulation only serves to stifle growth, scare off investment, and transfer opportunity away from small business owners. Please abandon these ill-conceived rules and let cannabis farmers farm without interference.

Alex Johnson  
alexjohnson323@yahoo.com  
4320 W. Deska Dr. Apt 508  
Spokane, Washington 99224

***Email regarding county zoning rulemaking:***

**From:** Alex Johnson <[info@actionnetwork.org](mailto:info@actionnetwork.org)>

**Date:** November 30, 2017 at 6:51:29 AM PST

**To:** [afrench@spokanecounty.org](mailto:afrench@spokanecounty.org)

**Subject:** Comment for the record; newly proposed mj zoning amendments

**Reply-To:** [alexjohnson323@yahoo.com](mailto:alexjohnson323@yahoo.com)

Al French,

I'm writing in opposition to a number of provisions in the proposed zoning ordinance for marijuana farms.

There are 138 marijuana farms in Spokane County, that's 138 small businesses.

In 2016 these farmers in Spokane employed more than 1,100 individuals, generated more than \$62 million in gross revenue on less than 50 acres. The industry is still in its infancy and the farmers need to be able to reinvest and grow their businesses to

remain competitive and over regulation significantly interferes with their ability to do so.

I've reviewed your recently proposed zoning ordinance for marijuana farms and am concerned about a number of provisions set forth in it.

Firstly, I strongly oppose the county modifying the definition of agriculture to exclude marijuana cultivation. Marijuana is a plant, cultivating cannabis most closely resembles agriculture. Washington L & I classify marijuana farm employees as agriculture workers and the WSDA regulates the pesticides & fertilizers cannabis farmers can use. The county should not adopt prejudicial definitions

Secondly, I oppose increasing the rear and side property line setbacks from 50' to 100'. It is unreasonable to deprive property owners of the use of that much of their land for the purposes they desire. The reality is that most marijuana farmers have not had complaints from their neighbors.

Thirdly, I oppose the requirement for a CUP process for farms seeking permits for expansion or construction. It is expensive and time consuming for both the farmer and the county.

Arcview Group estimates that the US marijuana industry will generate over \$21 billion by 2021. Nationwide legalization is inevitable and I personally want to see Washington State and Spokane County farmers poised to lead the nation and bring that revenue and jobs to our county and state. We need to be promoting the long term viability of the cannabis industry in Spokane County. Over regulation only serves to stifle growth, scare off investment, and transfer opportunity away from small business owners.

Please let cannabis farmers farm and oppose these changes.

Alex Johnson

[alexjohnson323@yahoo.com](mailto:alexjohnson323@yahoo.com)

4320 W. Deska Dr. Apt 508  
Spokane, Washington 99224

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**Email regarding SRCAA rulemaking:**

**From:** Derek Johnson [mailto:info@actionnetwork.org]  
**Sent:** Thursday, November 30, 2017 6:54 AM  
**To:** Public Comment  
**Subject:** Comment for the record; proposed MJ SRCAA rules and fees

Margee Chambers,

There are 138 marijuana farms in Spokane County, that's 138 small businesses.

In 2016 these farmers in Spokane employed more than 1,100 individuals, generated more than \$62 million in gross revenue on less than 50 acres. The industry is still in its infancy and the farmers need to be able to reinvest and grow their businesses to remain competitive and over regulation significantly interferes with their ability to do so.

I've reviewed your recently proposed rules and fees for marijuana farms and am highly concerned about a number of aspects.

1. It is ridiculous that the clean air agency is classifying the monoterpenes released by cannabis as an air contaminant. SRCAA's own analysis of the odors associated with cannabis identified that alpha-pinene was the most prevalent monoterpene released. This is the same monoterpene released by pine trees. The "air contamination" you are referring to is similar in chemical make up to the "contamination" one might experience taking a hike through a forest filled with ponderosa pine trees.
2. The clean air agency should be working to reduce carbon emissions or other toxic emissions rather than concerning itself with the aroma produced by a plant.
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5. Installation of a significant amount of control equipment recommended or required by SRCAA will make it challenging for marijuana farmers to comply with state energy codes. Regulations that conflict with other regulations should be avoided as it's unfair to the small businesses caught in the middle.
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farms over the last few years. It is my belief that it was irresponsible for the agency to engage in those activities prior to having regulations on the books granting them authority to do so.

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Derek Johnson  
derekjohnson36@yahoo.com  
4320 W. Deska Dr. Apt 508  
Spokane , Washington 99224

***•Email regarding county zoning rulemaking:***

**From:** Derek Johnson <[info@actionnetwork.org](mailto:info@actionnetwork.org)>

**Date:** November 30, 2017 at 6:53:56 AM PST

**To:** [afrench@spokanecounty.org](mailto:afrench@spokanecounty.org)

**Subject:** Comment for the record; newly proposed mj zoning amendments

**Reply-To:** [derekjohnson36@yahoo.com](mailto:derekjohnson36@yahoo.com)

Al French,

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Secondly, I oppose increasing the rear and side property line setbacks from 50' to 100'. It is unreasonable to deprive property owners of the use of that much of their land for the purposes they desire. The reality is that most marijuana farmers have not had complaints from their neighbors.

Thirdly, I oppose the requirement for a CUP process for farms seeking permits for expansion or construction. It is expensive and time consuming for both the farmer and the county.

Arcview Group estimates that the US marijuana industry will generate over \$21 billion by 2021. Nationwide legalization is inevitable and I personally want to see Washington State and Spokane County farmers poised to lead the nation and bring that revenue and jobs to our county and state. We need to be promoting the long term viability of the cannabis industry in Spokane County. Over regulation only serves to stifle growth, scare off investment, and transfer opportunity away from small business owners.

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Derek Johnson

[derekjohnson36@yahoo.com](mailto:derekjohnson36@yahoo.com)

4320 W. Deska Dr. Apt 508

Spokane , Washington 99224

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**From:** Leonard Lemieux <[info@actionnetwork.org](mailto:info@actionnetwork.org)>

**Date:** November 28, 2017 at 2:42:28 PM PST

**To:** [afrench@spokanecounty.org](mailto:afrench@spokanecounty.org)

**Subject:** Comment for the record; newly proposed mj zoning amendments

**Reply-To:** [leotrow@gmail.com](mailto:leotrow@gmail.com)

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Please let cannabis farmers farm and oppose these changes.

Leonard Lemieux

[leotrow@gmail.com](mailto:leotrow@gmail.com)

3911 E Trent Ave

Spokane, Washington 99202

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**From:** Spencer Freeman [mailto:spencer@cannapharmz.com]

**Sent:** Thursday, November 30, 2017 7:16 PM

**To:** Public Comment

**Subject:** Comment for the record; proposed MJ SRCAA rules and fees

Margee Chambers,

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Spencer Freeman  
spencer@cannapharmz.com  
PO Box 8  
Colbert, Washington 99005

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**From:** Bruce Eicher <[suneicher@aol.com](mailto:suneicher@aol.com)>

**Date:** November 30, 2017 at 3:35:32 PM PST

**To:** <[PublicComment@spokanecleanair.org](mailto:PublicComment@spokanecleanair.org)>, [afrench@spokanecounty.org](mailto:afrench@spokanecounty.org), [cnezat@ewu.edu](mailto:cnezat@ewu.edu), [tbratteiii@gmail.com](mailto:tbratteiii@gmail.com), [rhiggins@spokanevalley.org](mailto:rhiggins@spokanevalley.org), [mayor@cityofmillwood.org](mailto:mayor@cityofmillwood.org)

**Subject:** Re: Emergency Action Alert; Spokane Clean Air Fees for Farming

My name is Bruce Eicher, and I am an owner of Still Urban Nursery LLC, located in Deer Park Washington

There are 138 marijuana farms in Spokane County, that's 138 small businesses!

In 2016 these farmers in Spokane employed more than 1,100 individuals, generated more than \$62 million in gross revenue on less than 50 acres. The industry is still in its infancy and the farmers need to be able to reinvest and grow their businesses to remain competitive and over regulation significantly interferes with their ability to do so.

I've reviewed your recently proposed rules and fees for marijuana farms and am highly concerned about a number of aspects.

1. It is ridiculous that the clean air agency is classifying the monoterpenes released by cannabis as an air contaminant. SRCAA's own analysis of the odors associated with cannabis identified that alpha-pinene was the most prevalent monoterpene released. This is the same monoterpene released by pine trees. The "air contamination" you are referring to is similar in chemical make up to the "contamination" one might experience taking a hike through a forest filled with ponderosa pine trees.
2. The clean air agency should be working to reduce carbon emissions or other toxic emissions rather than concerning itself with the aroma produced by a plant. An aroma has not ever "harmed" anyone.
3. Penalizing outdoor farmers for growing a plant outdoors is ridiculous and discriminatory. Outdoor farmers require 80% less water, are environmentally helpful, ie less carbon emissions and sequesters CO2.
4. Creating regulations that incentivize indoor cultivation conflicts with the Governor's direction that regulatory agencies adopt regulations that consider carbon impact, it also appears to conflict with the state clean air act which reads "In selecting air pollution control strategies state and local agencies shall support those strategies that lessen the negative environmental impact of the project on all environmental media, including air, water, and land." Not only do outdoor cannabis plants convert CO2 to oxygen and deposit carbon into the soil, outdoor cultivation has a significantly smaller overall carbon footprint compared to indoor cultivation. **Indoor farmers have enormous carbon foot print, environmentally harmful, wasteful water demands and have a huge strain on the power grid.**
5. Installation of a significant amount of control equipment recommended or required by SRCAA will make it challenging for marijuana farmers to comply with state energy codes. Regulations that conflict with other regulations should be avoided as it's unfair to the small businesses caught in the middle.

6. It is a waste of agency resources to require all marijuana farmers to report to your agency, be inspected, and develop mitigation plans when most, more than 67% based on figures in your fact sheet are not associated with a single complaint.

7. The proposed rule to require marijuana farmers to report proprietary harvest schedules puts the safety and security of marijuana farmers at risk. Because SRCAA is subject to PRR that information can be made available to the public and can be leveraged by competing farms and/or individuals seeking to rob or burglarize a farmer at the ideal time. **This provision must be removed.**

8. I understand the agency has spent a large amount of money to inspect & visit marijuana farms over the last few years. It is my belief that it was irresponsible for the agency to engage in those activities prior to having regulations on the books granting them authority to do so.

9. The proposed fees are unduly burdensome. In comparing the initial registration fee plus the annual registration fee with the fiscal year 2016 median revenue for the various farm sizes some of the proposed fees amount to 7%-18% of the median gross revenue of a farm. This may very well be higher than the farmers profit considering the over-regulation and over-taxation the industry is already seeing.

10. -74% of the farms in Spokane have had zero complaints.

-75% of the complaints are associated with only 3 farms, it is unreasonable to assess high fees on all farmers as a result of the poor relationship a few farmers have with their neighbors

11. In analyzing my own farm's finances, the proposed fees would be 95% of the gross income by farm generated so far in 2017. (see below fee schedule to calculate) Or if you are a retailer this tax will increase costs as the farmers will increase wholesale cost to you and then it will increase the costs to your consumers.

The reality that the clean air agency, funded in part by tax payer's money would seek to force cultivation of a plant indoors is beyond disappointing to me. This is clearly an example of regulatory agency overreach and too much government in the private lives of individuals and businesses. Over-regulation only serves to stifle growth, scare off investment, and transfer opportunity away from small business owners. Please abandon these ill-conceived rules and let cannabis farmers farm without interference.

-----Original Message-----

From: Dallas Durkoop <[sun.dddurkoop@yahoo.com](mailto:sun.dddurkoop@yahoo.com)>

To: Bruce Eicher <[suneicher@aol.com](mailto:suneicher@aol.com)>

Sent: Wed, Nov 29, 2017 12:03 am

Subject: Fw: Emergency Action Alert; Spokane Clean Air Fees for Farming

Please Remember to write your letter. I have attached one if you guys want to use it.

Sheila

----- Forwarded Message -----

**From:** Cannabis Farmers Council <[crystal@wanorml.org](mailto:crystal@wanorml.org)>

**To:** "[sun.dddurkoop@yahoo.com](mailto:sun.dddurkoop@yahoo.com)" <[sun.dddurkoop@yahoo.com](mailto:sun.dddurkoop@yahoo.com)>

**Sent:** Monday, November 27, 2017, 4:09:46 PM PST

**Subject:** Emergency Action Alert; Spokane Clean Air Fees for Farming

Take Action & Stop Excessive Fees & Over-Regulation Today!



**10 days left**

to comment on **Spokane Clean Air Agency's Proposed Marijuana Rules & Fees.**

Send your e-mail & show up to testify!

**Fight back against excessive fees & over-regulation!**

The more farmers & friends of farmers who write & show up the better!

**Step 1: View Full Text** Here: (Fact Sheet & Q & A)

<https://www.spokanecleanair.org/news/1209/notice-of-public-comment-period-public-hearing-proposed-rules-for-marijuana-production-and-processing>

**Step 2: E-mail Written Comment** (And have your partners, friends, family, employees, vendors e-mail also) We recommend you write a custom letter using below talking points, but if you're too busy NORML has created an action alert that will autopopulate a letter for you, just fill in your info available here: <http://norml.org/action-center/item/spokane-wa-oppose-srcaa-s-proposed-rules-and-fees>

**To:** [PublicComment@spokanecleanair.org](mailto:PublicComment@spokanecleanair.org); [afrench@spokanecounty.org](mailto:afrench@spokanecounty.org); [cnezat@ewu.edu](mailto:cnezat@ewu.edu); [tbratteiii@gmail.com](mailto:tbratteiii@gmail.com); [rhiggins@spokanevalley.org](mailto:rhiggins@spokanevalley.org); [mayor@cityofmillwood.org](mailto:mayor@cityofmillwood.org);

**Subject:** Comment for the record; proposed MJ SRCAA rules and fees

**Suggested Talking Points:**

-State who you are, what farm you are with.

-74% of the farms in Spokane have had zero complaints.

-75% of the complaints are associated with only 3 farms, it is unreasonable to assess high fees on all farmers as a result of the poor relationship a few farmers have with their neighbors.

-Over-regulation is strangling this industry in its infancy, the proposed fees are unduly burdensome and are as high as 18.3% of the FY 2016 Median Gross Revenue for Spokane Farmers.

-In analyzing my own farm's finances, the proposed fees would be \_\_\_\_\_% of the gross income by farm generated so far in 2017. (see below fee schedule to calculate)

**Step 3: Attend the Hearing & Testify!**

Thursday December 7th, 9:30am, Spokane Clean Air's Office, 3104 E. Augusta Ave. Spokane, WA (located across from Spokane Community College, next to Starbucks)

**Please take the time**

to send in your comments and attend this hearing.

This is the first time MJ specific clean air agency rules  
 have been proposed in WA post-legalization.

It's important that we demonstrate unified opposition to this unreasonable attempt to  
 increase agency revenues on the backs of hardworking farmers!

**We can make a difference when we stand together!**

<b>Marijuana Production and Processing Registration Fees</b>			
<b>Initial Registration Fee</b>			
Registration fee categories	WA State Liquor and Cannabis Board (LCB) defined Producer Tier Size		
	Tier 1	Tier 2	Tier 3
Producer w/ processor license	\$750	\$1000	\$1250
Producer only	\$525		
Processor only	\$525		
<b>Annual Registration Fee</b>			
Registration fee categories	Tier 1	LCB Tier 2	LCB Tier 3
Producer indoor only	\$528	\$660	\$824
Producer outdoor only	\$1030	\$1286	\$1606
Producer indoor & outdoor	\$1558	\$1946	\$2430
Producer w/ Agency granted production exemption	\$3038	\$3798	\$4748
Processor w/ producer license	\$264 + producer fee		
Processor only	\$528		

<b>Production Exemption Application Fee</b>	
One time exemption application fee	\$980

Cannabis Farmers Council | PO Box 3, Dallesport , WA 98617

[Unsubscribe sun.dddurkoop@yahoo.com](mailto:sun.dddurkoop@yahoo.com)

[Update Profile](#) | [About our service provider](#)

Sent by [crystal@wanorml.org](mailto:crystal@wanorml.org) in collaboration with



[Try it free today](#)

.....  
From: Laura [mailto:nortlaur@isu.edu]  
Sent: Friday, December 01, 2017 11:48 AM  
To: Public Comment  
Subject: Proposed Rules for Marijuana in Spokane County

To Whom it may concern,

I am writing to voice my concern about the noxious smell produced in the production and use of marijuana in Spokane County neighborhoods. My family currently lives next door to a home (221 W. Alderwood Ave 99218) with occupants who smoke Marijuana in excessive amounts, in effect they "hot box" this residence. I recognize these individuals' right to engage in activities of their choice within their own home, however when your personal actions within your home began to have a negative impact on the surrounding neighbors you should no longer have the right to engage in that activity. The overwhelming smell that is produced by their use of marijuana is nothing short of noxious and stifling. The smell is constant and my children choose not to play outside because of the offensive smell. The smell is so pervasive that our entryway and garage constantly stink of this drug.

I do not feel that these individuals should be allowed to make the choice for me, my family and the neighborhood as to whether we are able to enjoy and feel comfortable at and around our own residences. The standard and quality of our neighborhood and home as lowered due to the noxious smell that has overtaken this area.

There is also the concern that in the future as we or our neighbors wish to sell our properties, our homes will be undesirable for this very reason. I have yet to have a visitor or company not comment on the overpowering smell that pervades our property and home. Our property value has decreased and certainly could be considered of no value by those who are as offended by this horrible smell.

If the county chooses not to change, implement and enforce rules regarding the harmful and noxious smells that coincide with the excessive use of marijuana, then not only could they be held liable for the loss in property value of surrounding homes but they would be sending a clear message to those in the county that an individual's right to use this drug prevails over the families and communities we hope to keep happy and healthy.

Sincerely,

Laura Dalley  
(208)220-9860  
Sent from my iPhone

.....  
SPOKANE REGIONAL  
CLEAN AIR AGENCY  
.....

November 30, 2017

Subject: Marijuana growing operation on Half Moon Road

Once upon a time, visiting friends and relatives along Half Moon Road was such a pleasure. For generations, we could sit outdoors and enjoy fresh country air filled with the sweet scent of agriculture.

Then the county spoiled the good life by permitting a marijuana growing operation in the area. Forget the fresh, healthy country air and enjoying nature. The putrid air near the marijuana operation often reminds me of the smell of an old rendering plant on a hot day.

Rather than enjoying happy, healthy days playing outdoors in fresh air, children in the neighborhood stay indoors when the air is "ripe" and sickening. Adults no longer plan to gather for outdoor activities in case it's a day filled with the awful odor from the marijuana operation.

Please help restore this area to country living for those of us who enjoy the great outdoors and the simple luxury of FRESH air.

Sincerely,

  
Beverly Robertson  
1403 W Spring Lane  
Spokane WA 99218

.....  
**Note: 2 emails originating from the commenter were received. Some to SRCAA and some to Spokane Co. and forwarded to SRCAA resulting in duplication.**

**From:** jay low [mailto:jlow0909@gmail.com]

**Sent:** Friday, December 01, 2017 12:33 PM

**To:** Public Comment; afrench@spokanecounty.org; cnezat@ewu.edu; tbratteiii@gmail.com; mayor@citymillwood.org

**Subject:** comment for the record; proposed MJ SRCAA rules and fees.

To whom it may concern,

I am writing this letter to support the I502 farms regarding the proposed MJ SRCAA rules and fees.

74% of the farms in Spokane have had zero complaints while 75% of the complaints are associated to only 3 farms. It is unreasonable to assess high fees on all the farmers as a result of the poor relationship a few farmers have with their communities.

Over regulation is detrimental to the I502 industry in its infancy. The proposed fees are unduly burdensome and are as high as 18.3% of the FY 2016 Median Gross Revenue for Spokane farmers.

Please consider all the difficulties and expenses associated in running an I502 farm successfully, and do without the proposed hike in fees and regulations.

Sincerely,

Jay Low

.....

**From:** Mary Curley [mailto:curleysu13@icloud.com]  
**Sent:** Friday, December 01, 2017 1:18 PM  
**To:** Public Comment  
**Subject:** Comments on proposed clean air regulation changes

Hello-

I work for a tier 2 producer/ processor, managing the business, and would like to provide comments on the proposed rules for Marijuana Producers & Processors in Spokane County.

We recognize that our industry has an impact on SRCAA and the community at large. We do not object to registering our business with the SRCAA and being available to work with the agency on ways to improve outdoor air quality in our community.

As an indoor producer, we take our presence in our Spokane Valley neighborhood very seriously. We work hard to be considerate to our neighbors (who are a mix of indoor producers and other industrial businesses). We already utilize carbon filters, avoid direct ventilation to the outside air and all doors and windows are kept locked and shut at all times as we operate a secured facility.

In reviewing the proposed rules, we have concerns about the proposed approach to reducing air contaminants and the consequences of the proposed rules and additional taxes & fees.

Concern 1: Legitimacy of complaints

We were incorrectly targeted earlier this year for a complaint generated by our neighbor. We operate in separate buildings from them and they share a building with an indoor tier 1 p/p. In the complaint it was noted that the complainant had issues with the indoor air quality from sharing a building with an indoor grow as well as concerns about outdoor air quality and they (and SRCAA) mistakenly assumed we owned both locations. The SRCAA agent did not detect odor outside of our facility and the complaint was closed. What is noteworthy about this incident is that the complainant stated he was filing the complaint to get out of his business lease.

Marijuana is a new industry and one that still generates a lot of emotion in the community.

-Has there been any consideration regarding how many of the increased complaints are genuinely from concerns about air pollution rather than a dislike for who their neighbors are? (Of the 322 complaints, they all tie back to only 44 businesses and only 69 complainants. That does not seem like the majority of the industry is causing problems but rather there are other issues at play between neighbors.)

-Of the complaints filed, how many have been found to be credible and worthy of further action against the marijuana producer?

-Has there been any breakdown of complaints by year rather than just pre-legalization vs post legalization? Is the rate of complaints increasing dramatically year over year?

Certainly having SRCAA know who we are and who our neighbors are would have helped this situation, however this information is already publicly available online and from the state. So is registration more an issue of coordination with the WSLCB rather than forcing businesses to register individually?

#### Concern 2: Distribution of pollution risk and fairness of fees

As an indoor producer, we do understand that there is an odor generated by marijuana. It seems logical that outdoor producers will have a much harder time containing odors than we do. Also, tier 3's have three times the allowed canopy space than a tier 2. So an outdoor, tier 3 farm will face a much harder time containing odor than a tier 2, indoor grow. This exponential increase in canopy space and contribution of odor is not fairly represented in the proposed fee structure. The amount of money a tier 3 can generate is far beyond what a tier 2 can generate.

-How were the proposed fee structures created? Was there any consideration given to the risk of odor pollution or was it just based on an arbitrary starting point and stepped increases?

#### Concern 3: Taxing everyone instead of fining the offenders

If there were 44 businesses that comprised 322 complaints, then it seems logical to hold those businesses (with a final count comprised of legitimate complaints) financially responsible for the added burden and cost the SRCAA is experiencing. Taxing the 160+ businesses in Spokane County because less than 44 of them are being irresponsible seems excessive and inappropriate.

#### Concern 4: Over Burdening small businesses

Lastly, we are a small business. Although the lure of the marijuana industry seems like a green rush of money, the reality is far from that.

We employ roughly 15 people, all of whom are supporting families that live in Spokane County and the surrounding area. We do not have outside investors or accounts with millions of dollars sitting in them. We are completely funded from sales of our products and most months we just barely squeak by to the next month.

We are competing in a tight market where the costs of doing business are higher than non-marijuana industries and where we (as indoor producers) receive roughly the same price for our product as outdoor producers receive with far less overhead costs. At every turn we are being taxed by anyone and everyone who can find a reason to charge us more than they would a non-marijuana business. We already pay additional licensing fees to the state and cities we do business in. We already operate under most of the guidelines outlined in the proposed rules. Adding an additional \$1000 and similarly priced recurring fees every year is not funds that our business readily has on hand and will not provide any greater impact to the community as we are already abiding by the proposed desires for our business type.

We kindly ask that the fee structures and requirements take these factors and our concerns above into account before rules are set.

Warmest Regards,  
Mary  
administrative support

Tier 2 Producer/ Processor

.....  
**From:** David Camp [mailto:dgcamp@hotmail.com]  
**Sent:** Friday, December 01, 2017 4:03 PM  
**To:** Public Comment  
**Subject:** Proposed rules for marijuana production and processing

To whom it may concern:

While I am exceedingly grateful for the Clean Air Agency's work to keep Spokane air clean, this rule against pot growers seems excessive—and targeted less against the smell than against the product.

It's particularly striking that so many of the complaints come from the same kinds of rural residents who have long told suburbanites to stop complaining about the smells of farm country.

Marijuana odors are not harmful, and are certainly less offensive than the choking reek from livestock feedlots and chicken houses that are so common around here, let alone the smell of grain fields after manure applications, or the rich stink of composting onion waste.

I see no reason to spend our resources on regulation of marijuana farm smells any more than on aromas from other agricultural pursuits. Instead, let's focus your resources on the clean air issue that everyone in Eastern Washington complains about: the endless, unhealthy clouds of summer smoke from wildfires being amplified by global warming.

Thank you,

David Camp

2729 W. Westover, Spokane, WA 99208

.....  
**From:** Matthew Mccloskey [mailto:mmccloskeyconstruction@gmail.com]  
**Sent:** Sunday, December 03, 2017 5:05 PM  
**To:** Public Comment  
**Subject:** Public Comment Period on Proposed Rules for Marijuana Producers

To whom it may concern,

I am a neighbor in the Mead School district area, and I have a neighbor at 221 W. Alderwood Ave, in particular that is growing marijuana in their garage. This neighbor is a renter and is growing marijuana in their home. Myself and a handful of neighbors have tried to reach out to the homeowner/landlord over the overpowering odor to no avail. The renters may be in their legal right to grow marijuana due to medical purposes. However; their growing of marijuana has adversely affected our neighborhood and has been a major detriment to those affected by it. When they vent their garage to allow the marijuana odor to be released, the odor is so strong from the plants that its unbearable to be outside. My family and I can't spend more than a few minutes outside because the odor is so strong and pungent. What makes matters worse, is I'm not sure this particular neighbor is following the legal perimeters of growing marijuana in their home. They live adjacent to a park and school. We're requesting that the guidelines and rules change so that you cannot grow marijuana in residential neighborhoods, or at the very minimum directly next to schools or parks. Thank you for your time. If you would so kindly respond with the specific RCW on the legal perimeters and distances in which people can produce/grow marijuana, so we can properly educate ourselves, that would be greatly appreciated. Once again, thank you for your time.

.....  
**Note: 2 emails originating from the commenter were received. Some to SRCAA and some to Spokane Co. and forwarded to SRCAA resulting in duplication.**

**From:** Mary Susan Gress [mailto:susiegress@comcast.net]  
**Sent:** Monday, December 04, 2017 9:19 AM  
**To:** Public Comment  
**Subject:** Comment for the record; proposed MJ SRCAA rules and fees

Margee Chambers,

Most odor complaints come from outdoor farms. It is unfair for indoor cannabis farms to be subjected to arbitrary and ineffective regulations just because the Agency can't control outdoor farm odor. Demanding the same equipment regardless of its effectiveness with a farms particular growing methods and equipment layout is wasteful, burdensome, and pointless.

Many indoor farms grow far from their neighbors, and no odor escapes their property line. Why should they be forced to install expensive and unneeded equipment, and pay you an annual fee, for no reason whatsoever? This is simply a fee for growing a plant some people don't like.

If growing cannabis truly produces a dangerous compound, what is the Agency doing to protect the public from all of the illegal grows? Nothing, because there is no revenue stream there.

I will be happy to comply with regulations once the Agency provides a set of standards to be met- what concentration of what compounds is considered acceptable?

Sincerely

Susan Gress

Mary Susan Gress

susiegress@comcast.net

23001 Kingsbury Road

Vashon, Washington 98070

.....

To Whom It May Concern



I am formally filing my complaint to the stink created by the Grow Operation on W. Half Moon.

Sadly my grandchildren and their parents live adjacent to this putrid smelly pot farm. On repeated summer evenings we have been forced indoors while enjoying the country life style.

I am so dissappointed that this infringement of my rights is allowed!!! How on earth did this get approved? When I <sup>am planning to</sup> babysit, I ask how is the air quality? More often than not it seemed that it was likely that I would rather Not be there. What a shame! So saddened by this ruining our enjoyment. Kim (over)

Kim Price  
P.O. Box 28493  
Spokane, WA 99228

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**From:** Amber Durkoop [mailto:info@actionnetwork.org]  
**Sent:** Monday, December 04, 2017 5:09 PM  
**To:** Public Comment  
**Subject:** Comment for the record; proposed MJ SRCAA rules and fees

Margee Chambers,

There are 138 marijuana farms in Spokane County, that's 138 small businesses.

In 2016 these farmers in Spokane employed more than 1,100 individuals, generated more than \$62 million in gross revenue on less than 50 acres. The industry is still in its infancy and the farmers need to be able to reinvest and grow their businesses to remain competitive and over regulation significantly interferes with their ability to do so.

I've reviewed your recently proposed rules and fees for marijuana farms and am highly concerned about a number of aspects.

1. It is ridiculous that the clean air agency is classifying the monoterpenes released by cannabis as an air contaminant. SRCAA's own analysis of the odors associated with cannabis identified that alpha-pinene was the most prevalent monoterpene released. This is the same monoterpene released by pine trees. The "air contamination" you are referring to is similar in chemical make up to the "contamination" one might experience taking a hike through a forest filled with ponderosa pine trees.
2. The clean air agency should be working to reduce carbon emissions or other toxic emissions rather than concerning itself with the aroma produced by a plant.
3. Penalizing outdoor farmers for growing a plant outdoors is ridiculous and discriminatory.
4. Creating regulations that incentivize indoor cultivation conflicts with the Governor's direction that regulatory agencies adopt regulations that consider carbon impact, it also appears to conflict with the state clean air act which reads "In selecting air pollution control strategies state and local agencies shall support those strategies that lessen the negative environmental impact of the project on all environmental media, including air, water, and land." Not only do outdoor cannabis plants convert CO<sub>2</sub> to oxygen and deposit carbon into the soil, outdoor cultivation has a significantly smaller overall carbon footprint compared to indoor cultivation.
5. Installation of a significant amount of control equipment recommended or required by SRCAA will make it challenging for marijuana farmers to comply with state energy codes. Regulations that conflict with other regulations should be avoided as it's unfair to the small businesses

caught in the middle.

6. It is a waste of agency resources to require all marijuana farmers to report to your agency, be inspected, and develop mitigation plans when most, more than 67% based on figures in your fact sheet are not associated with a single complaint.

7. The proposed rule to require marijuana farmers to report proprietary harvest schedules puts the safety and security of marijuana farmers at risk. Because SRCAA is subject to PRR that information can be made available to the public and can be leveraged by competing farms and/or individuals seeking to rob or burglarize a farmer at the ideal time. This provision must be removed.

8. I understand the agency has spent a large amount of money to inspect & visit marijuana farms over the last few years. It is my belief that it was irresponsible for the agency to engage in those activities prior to having regulations on the books granting them authority to do so.

9. The proposed fees are unduly burdensome. In comparing the initial registration fee plus the annual registration fee with the fiscal year 2016 median revenue for the various farm sizes some of the proposed fees amount to 7%-18% of the median gross revenue of a farm. This may very well be higher than the farmers profit considering the over-regulation and over-taxation the industry is already seeing.

The reality that the clean air agency, funded in part by tax payer's money would seek to force cultivation of a plant indoors is beyond disappointing to me. This is clearly an example of regulatory agency overreach and too much government in the private lives of individuals and businesses. Over-regulation only serves to stifle growth, scare off investment, and transfer opportunity away from small business owners. Please abandon these ill-conceived rules and let cannabis farmers farm without interference.

Amber Durkoop  
amberrae.d@gmail.com  
4011 E. 19th  
Spokane, Washington 99223

.....

**From:** Robert Bailey [mailto:Robert@lumastrada.com]  
**Sent:** Monday, December 04, 2017 5:16 PM  
**To:** Public Comment  
**Subject:** Comment for the record; proposed MJ SRCAA rules and fees

Margee Chambers,

There are 138 marijuana farms in Spokane County, that's 138 small businesses.

In 2016 these farmers in Spokane employed more than 1,100 individuals, generated more than \$62 million in gross revenue on less than 50 acres. The industry is still in its infancy and the farmers need to be able to reinvest and grow their businesses to remain competitive and over regulation significantly interferes with their ability to do so.

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significantly smaller overall carbon footprint compared to indoor cultivation.

5. Installation of a significant amount of control equipment recommended or required by SRCAA will make it challenging for marijuana farmers to comply with state energy codes. Regulations that conflict with other regulations should be avoided as it's unfair to the small businesses caught in the middle.

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Robert Bailey

Robert@lumastrada.com  
3408 17th  
Spokane, Washington 99223

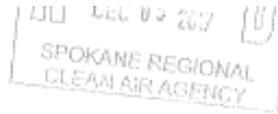
.....  
**From:** Jeff Best [mailto:jdacres01@gmail.com]  
**Sent:** Tuesday, December 05, 2017 10:02 AM  
**To:** Public Comment  
**Subject:** Marijuana Public Hearing

hello,

my name is Jeff L. Best and i own 5 acres in north spokane county. Just over 300 ft to the west of me is a Indoor Marijuana Producer that emits odors at any given time of day or nite that are UNBEARABLE, and that is not an exaggeration. It is so pungent that we choose not to be outdoors and enjoy our property that we have worked so hard to make it useable and enjoyable. Living out here is incredible, the peace and quite and fresh clean air makes the long commute worth it, but the strong stench of this processor has made it difficult to completely enjoy our own property. Most everyone out here enjoys the summer evenings with the fan in the window to cool the house, but with that odor it fills the house with that stench. Try sleeping with a house full of marijuana odor. UNACCEPTABLE !!!!! As we have made the choice to live out here we do so to be outside the majority of the time, thats just how we are. I am disabled and home pretty much all the time and i am in and out for 16 hours a day. I have coffee on my deck and it is often i will have to go back in the house due to the odor. The rules state "It shall not interfere with enjoyment of life and property". I ask you to PLEASE help us with this issue. Thank you very much for your time and consideration.

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Dear SRCAA,



Regarding legal Cannabis Farms in our County may I say has destroyed my life plans and an entire community.

A Mr. Sean Green lied to my real estate agent, Bonnie White presenting that he would build a home and a shop on the 20 acres I sold him. He actually built a large stick structure to become a marijuana growing facility. After adding a fence which encroached onto the easement, he began growing marijuana plants outside as well. The odor is intolerable. He refuses to back the fence off the easement and has in fact completely blocked the easement access. He drilled a well which is using who knows how much water to grow and clean the product. Only after a legal action would he reimburse the farmer for destroyed crops as agreed to in the sales contract. I am still carrying the contract on the land upon which he has built his facility against the sales contract again. The fire department has visited him for his bonfires. He has titillated a contractor's employee to punch him. He boasts of carrying a gun in his pocket. This is not the sort of person welcome in any neighborhood. And this is not a business our Christian farming community wants.

Our acreage is minutes away from Spokane City. My property value assessment is down. In fact, because of this Cannabis growing facility I cannot sell my property to future homeowners who want the country living close to town, to raise their kids, to enjoy their retirement, etc. There is no enforcement to keep the pot growers in compliance and this one does whatever he wants with belligerence and more money than we have.

This Pot-growing Farm, Kouchard Productions, is not acceptable on any level. And experience with this grower makes me think that smoking this product changes ones brain function into unacceptable and possibly dangerous or criminal behavior. Please get it out of Spokane County and make them go to less populated areas. Better yet outlaw it. If nothing else please get the smell out of the air. It brings one to gag, worse than any barnyard. Thank You.

Sincerely,

Leslie Walsh  
4007 N oak  
Spokane, WA 99205  
509 328 1706

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**From:** Casey Connell [mailto:info@actionnetwork.org]  
**Sent:** Tuesday, December 05, 2017 3:06 PM  
**To:** Public Comment  
**Subject:** Comment for the record; proposed MJ SRCAA rules and fees

Margee Chambers,

There are 138 marijuana farms in Spokane County, that's 138 small businesses.