

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.

Thomas Barber  
tom.barber69@gmail.com  
PO Box 1479  
Airway Heights, Washington 99001

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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.**

**From:** Harley Clifton [mailto:info@actionnetwork.org]  
**Sent:** Friday, November 17, 2017 6:34 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.

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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.

Harley Clifton  
harleyclifton@gmail.com  
947 north 89th st  
Seattle, Washington 98103

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***Note: 5 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:** Cynthia Smith [mailto:info@actionnetwork.org]  
**Sent:** Saturday, November 18, 2017 8:16 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.

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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.

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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Cynthia Smith  
fantasyfarmsllc@gmail.com  
1220 w ballard rd  
spokane, Washington 99208

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

**From:** Cynthia Smith <[info@actionnetwork.org](mailto:info@actionnetwork.org)>

**Date:** November 18, 2017 at 6:15:58 AM HST

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

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

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

Cynthia Smith

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

1220 w ballard rd

spokane, Washington 99208

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**Note: 5 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:** Shaun Wareham [mailto:info@actionnetwork.org]

**Sent:** Saturday, November 18, 2017 8:54 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.

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Shaun Wareham  
northwest7point@gmail.com  
5805 E Sharp, STE C6  
Spokane Valley, Washington 99212

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

**From:** Shaun Wareham <[info@actionnetwork.org](mailto:info@actionnetwork.org)>

**Date:** November 18, 2017 at 6:54:42 AM HST

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

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

**Reply-To:** [northwest7point@gmail.com](mailto:northwest7point@gmail.com)

Al French,

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

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Please let cannabis farmers farm and oppose these changes.

Shaun Wareham

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5805 E Sharp, STE C6

Spokane Valley, Washington 99212

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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.**

**From:** Shawna Stafford [mailto:info@actionnetwork.org]

**Sent:** Saturday, November 18, 2017 9:37 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.

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similar in chemical make up to the "contamination" one might experience taking a hike through a forest filled with ponderosa pine trees.

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Shawna Stafford  
shawnnastafford@yahoo.com  
1102 NE 105th St #32  
Vancouver, Washington 98685

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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.***

**From:** Ruby Wilson [mailto:info@actionnetwork.org]  
**Sent:** Saturday, November 18, 2017 9:59 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.

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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. Furthermore how can you justify these fees and what evidence can you possibly give that shows any of these fees will affect "clean air" in our state in any way? Growing Cannabis does not negatively affect our air! My farm has an incredibly noxious smelling compost company on the north side of our business and a animal crematorium on the south and neither of these companies would be subject to such steep fees!

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 not just ridiculous.....it is indeed STUPID and SHORT SIGHTED! 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 these farmers farm without interference.

Ruby Wilson  
inthegorge@gmail.com  
173 Maryhill Hwy  
Goldendale, Washington 98620

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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.**

**From:** Dawn Darington [mailto:info@actionnetwork.org]  
**Sent:** Saturday, November 18, 2017 6:30 PM  
**To:** Public Comment  
**Subject:** Comment for the record; proposed MJ SRCAA rules and fees

Margee Chambers,

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Dawn Darington  
dawndarinton@yahoo.com  
11318 5th Ave NE  
Seattle, Washington 98125

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***Note: 7 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:** Colum Tinley [mailto:cpt409@ymail.com]  
**Sent:** Sunday, November 19, 2017 11:11 AM  
**To:** Public Comment  
**Subject:** Comment for the record; proposed MJ SRCAA rules and fees

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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.

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

**From:** Colum Tinley [mailto:cpt409@ymail.com]

**Sent:** Sunday, November 19, 2017 11:11 AM

**To:** Public Comment

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

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'. Setbacks for farming cannabis should be no different than setbacks for growing any other plant. 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.

Colum Tinley  
[cpt409@ymail.com](mailto:cpt409@ymail.com)  
409 Lane de Chantal  
Port Townsend, Washington 98368

***Email regarding SRCAA rulemaking:***

From: Colum Tinley [mailto:[cpt409@ymail.com](mailto:cpt409@ymail.com)]  
Sent: Sunday, December 03, 2017 11:27 AM  
To: Public Comment; [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

As a small tier 2 cannabis farmer I object to the discriminatory nature of the proposed Spokane Clean Air Agency rules and fees. Any rules or fees created by any agency need to be applied equally to all farmers, factories, retailers, auto repair shops, etc. in order to avoid discrimination. I understand the commonly held belief that anyone in the cannabis business is filthy stinking rich but unfortunately that is very far from the truth, in fact most cannabis farmers are struggling to survive, myself included. Due to over regulation, over taxation and a money grabbing attitude from many suppliers of cannabis related growing and processing equipment this is a very difficult business to succeed in. If any clean air agency is truly interested in clean air their enforcement efforts should be focused on actual polluters. A farmer growing kale, pumpkins, hemp, cannabis or just about any other plant is not polluting our air. Businesses like paper mills, wood fired cogeneration plants and cruise ships are indeed big time polluters. To avoid discrimination I suggest the Spokane Clean Air Agency stop targeting struggling cannabis farmers and only create rules and fees that apply to all businesses without exception.

Colum Tinley  
Discovery Garden  
Tier II Producer/Processor

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**Note: 5 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:** Clayton Sperry [mailto:clayton@gorgegold.com]

**Sent:** Sunday, November 19, 2017 4:25 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.*

*Clayton Sperry*

clayton@gorgegold.com  
10728 8th Ave NE #1  
Seattle, Washington 98125

**Email regarding county zoning rulemaking:**

**From:** Clayton Sperry <[clayton@gorgegold.com](mailto:clayton@gorgegold.com)>  
**Date:** November 19, 2017 at 2:25:09 PM HST  
**To:** [afrench@spokanecounty.org](mailto:afrench@spokanecounty.org)  
**Subject:** Comment for the record; newly proposed mj zoning amendments  
**Reply-To:** [clayton@gorgegold.com](mailto:clayton@gorgegold.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.

Clayton Sperry

[clayton@gorgegold.com](mailto:clayton@gorgegold.com)

10728 8th Ave NE #1

Seattle, Washington 98125

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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.***

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

**From:** Jeffrey Hanson <[info@actionnetwork.org](mailto:info@actionnetwork.org)>

**Date:** November 17, 2017 at 1:33:15 PM HST

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

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

**Reply-To:** [jhanson2k@aol.com](mailto:jhanson2k@aol.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.

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Please let cannabis farmers farm and oppose these changes.

Jeffrey Hanson

[jhanson2k@aol.com](mailto:jhanson2k@aol.com)

P.O. Box 1400

Kingston, Washington 98346

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**Note: 4 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:** Nicholas Simchuk <[thegreenbluffgardener@gmail.com](mailto:thegreenbluffgardener@gmail.com)>

**Date:** November 13, 2017 at 2:38:11 PM HST

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

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

My name is Nicholas Simchuk and I own The GreenBluff Gardener.

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

In 2016 these farmers in Spokane employees more than 1100 individuals, generated \$62 million in gross revenue in 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 interferes with their ability to do so.

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

- 1.
2. 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 identifies 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 as the "contamination" one might experience taking a hike through a forest of filled with ponderosa pine trees.

- 2.
3. 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.
4. 3. PENALIZING OUTDOOR FARMERS FOR GROWING A PLANT OUTDOORS IS RIDICULOUS AND DISCRIMINATORY.
- 4.
5. 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. 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.
7. 6. IT IS A WASTE OF AGENCY RESOURCES TO REQUIRE ALL MARIJUANA FARMERS TO REPORT TO OUR 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.
8. 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.
9. 8. I UNDERSTAND THE AGENCY HAS SPENT A LARGE AMOUNT OF MONEY TO INSPECT AND VISIT MARIJUANA FARMS OVER THE LAST FEW YEARS. It is my belief that it was irresponsible of an agency to engage in those activities prior to having regulations on the books granting them authority to do so.

9.

10. 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.

11. 10. IN ANALYZING MY OWN FARM'S FINANCES, THE PROPOSED FEE WOULD BE 28% OF THE GROSS INCOME MY FARM HAS GENERATED SO FAR IN 2017. Between the burdensome regulations imposed on our farms by the WSLCB and DOH the 42% increase in license fees we experience this year, the increase in county permitting cost, the 50% increase in testing fees due to regulatory change, and the reality that we are unable to take standard business deductions I'm not sure my business can support another fee. This burdensome fee many be the straw that breaks the camels back.

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 way from small business owners. Pleas abandon these ill-conceived rules and let cannabis farmers farm without interference. Thank you for your time.

Nicholas Simchuk  
The GreenBluff Gardener

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

**From:** Nicholas Simchuk <[thegreenbluffgardener@gmail.com](mailto:thegreenbluffgardener@gmail.com)>

**Date:** November 13, 2017 at 1:13:05 PM HST

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

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

My name is Nicholas Simchuk and I own The GreenBluff Gardener. 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 proposes zoning ordinance for marijuana farms and am concerned about a number of provisions set forth in it.

1. First, I STORONGLY OPPOSE THE COUNTY MODIFYING THE DEFIFNITION OF AGRICULTURE TO EXCLUDE MURIJUANA CULTIVATON. Marijuana is a plant, cultivating cannabis most closely resembles agriculture. Washington L and I classify marijuana

farm employees as agriculture workers and the WSDA regulates the pesticide and fertilizers cannabis farmers can use.

2. 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.

3. Thirdly, I OPPOSE THE REQUIREMENTS 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 farmer 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 of investment and transfer opportunity away from small business owners. Please let cannabis farmers farm. Thank you for your time.

Nicholas Simchuk  
The GreenBluff Gardener  
Owner

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**Note: 5 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:** Johanna Tuttle [mailto:info@actionnetwork.org]  
**Sent:** Monday, November 20, 2017 9:14 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.
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.

Johanna Tuttle

johanna.tuttle@hotmail.com

2315 N Coleman Rd

Spokane Valley, Washington 99212

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

**From:** Johanna Tuttle <[info@actionnetwork.org](mailto:info@actionnetwork.org)>

**Date:** November 20, 2017 at 7:14:47 AM HST

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

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

**Reply-To:** [johanna.tuttle@hotmail.com](mailto:johanna.tuttle@hotmail.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.

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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.

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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.

Johanna Tuttle

[johanna.tuttle@hotmail.com](mailto:johanna.tuttle@hotmail.com)

2315 N Coleman Rd

Spokane Valley, Washington 99212

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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.***

**From:** Angela Griffith [mailto:info@actionnetwork.org]

**Sent:** Monday, November 20, 2017 9:50 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 CO2 to oxygen and deposit carbon into the soil, outdoor cultivation has a significantly smaller overall carbon footprint compared to indoor cultivation.
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Angela Griffith  
72angelasue@gmail.com  
419 W. Jefferson  
Girard, Illinois 62640

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***Note: 5 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:** Kristin Pattison [mailto:info@actionnetwork.org]  
**Sent:** Monday, November 20, 2017 10:06 AM  
**To:** Public Comment  
**Subject:** Comment for the record; proposed MJ SRCAA rules and fees

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.

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

**From:** Kristin Pattison <[info@actionnetwork.org](mailto:info@actionnetwork.org)>

**Date:** November 20, 2017 at 8:07:53 AM HST

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

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

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

Kristin Pattison

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

548 E Rich Ave

Spokane, Washington 99207

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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:** Beth Cantrell [mailto:beth@conflabs.com]

**Sent:** Monday, November 20, 2017 4:20 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. There are also the ancillary businesses that are related which are far more numerous.

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.

Beth Cantrell  
beth@conflabs.com  
14797 NE 95th St  
Redmond, Washington 98052



**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:** Justin Peterson [mailto:peterson.justin@me.com]  
**Sent:** Monday, November 20, 2017 5:18 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.
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Justin Peterson  
peterson.justin@me.com  
503 E 8th Ave Apt A  
Spokane, Washington 99202

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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:** Robert B Smith [mailto:rbriansmith@msn.com]  
**Sent:** Monday, November 20, 2017 5:58 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.

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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.

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Robert B Smith  
rbriansmith@msn.com  
1813 N Hutchinson Rd, Apt 31  
Spokane Valley, Washington 99212

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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:** James Hickey [mailto:info@actionnetwork.org]  
**Sent:** Monday, November 20, 2017 8:03 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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James Hickey  
jhickey5229@gmail.com  
107 e spence  
Medical lake, Washington 99022

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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:** Tina Cox [mailto:info@actionnetwork.org]

**Sent:** Tuesday, November 21, 2017 6:25 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.

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Tina Cox

ladyearth12@gmail.com

144 morgan

Toutle Wa, Washington 98649

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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:** Terry Evans [mailto:terrye2002@msn.com]  
**Sent:** Tuesday, November 21, 2017 7:18 AM  
**To:** Public Comment  
**Subject:** Comment for the record; proposed MJ SRCAA rules and fees

Margee Chambers,

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Terry Evans  
terrye2002@msn.com

1329 N lily rd.  
Spokane, vly, Washington 99212

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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:** Scott Dekay [mailto:info@actionnetwork.org]  
**Sent:** Tuesday, November 21, 2017 7:58 AM  
**To:** Public Comment  
**Subject:** Comment for the record; proposed MJ SRCAA rules and fees

Margee Chambers,

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opportunity away from small business owners. Please abandon these ill-conceived rules and let cannabis farmers farm without interference.

Scott Dekay

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

4420 williams valley rd

Clayton , Washington 99110

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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:** Clay Schueman [mailto:clay@yieldfarms.com]

**Sent:** Tuesday, November 21, 2017 8:54 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.
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.

Clay Schueman

[clay@yieldfarms.com](mailto:clay@yieldfarms.com)

3911 E trent

Spokane, Washington 99202

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

**From:** Clay Schueman <[clay@yieldfarms.com](mailto:clay@yieldfarms.com)>

**Date:** November 21, 2017 at 6:54:45 AM HST

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

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

**Reply-To:** [clay@yieldfarms.com](mailto:clay@yieldfarms.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.

Clay Schueman

[clay@yieldfarms.com](mailto:clay@yieldfarms.com)

3911 E trent

Spokane, Washington 99202

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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:** Anita Jacquet [mailto:info@actionnetwork.org]

**Sent:** Tuesday, November 21, 2017 9:08 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 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.

Anita Jacquet

anitaj99207@gmail.com

1832 E South Riverton Ave

Spokane, Washington 99207

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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:** alan dahl [mailto:info@actionnetwork.org]

**Sent:** Tuesday, November 21, 2017 9:50 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.

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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.

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alan dahl

forrealestatenow@gmail.com  
26815 N. Hardesty rd  
Chattaroy, Washington 99003

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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:** Nick Mosely [mailto:info@actionnetwork.org]  
**Sent:** Tuesday, November 21, 2017 10:26 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.

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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.

Nick Mosely  
brickmosely@gmail.com  
19821 23rd Dr SE  
Bothell, Washington 98012

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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:** Nora Callahan [mailto:nora@november.org]  
**Sent:** Tuesday, November 21, 2017 10:40 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.

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similar in chemical make up to the "contamination" one might experience taking a hike through a forest filled with ponderosa pine trees.

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Nora Callahan  
nora@november.org  
282 West Astor Ave  
Colville, Washington 99114

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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:** John Gereighty [mailto:johngereighty@att.net]  
**Sent:** Tuesday, November 21, 2017 1:22 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.

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John Gereighty  
johngereighty@att.net  
15895 rd 9 nw  
Quincy , Washington 98848

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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:** Jessica Lee [mailto:jessy@g2grec.com]  
**Sent:** Tuesday, November 21, 2017 2:49 PM  
**To:** Public Comment  
**Subject:** Comment for the record; proposed MJ SRCAA rules and fees

Margee Chambers,

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Jessica Lee  
jessy@g2grec.com  
3312 W 34th Ave  
Kennewick, Washington 99337

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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:** Jeff Merryman [mailto:info@actionnetwork.org]  
**Sent:** Wednesday, November 22, 2017 12:18 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.

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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.

Jeff Merryman  
merrymanjc@hotmail.com  
PO box 62  
Littlerock, Washington 98556

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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:** Willard Garrett [mailto:info@actionnetwork.org]  
**Sent:** Wednesday, November 22, 2017 1:48 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.

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.

Willard Garrett  
snoopygarrett@aol.com  
1314 E Everett Ave  
Spokane, Washington 99207

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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:** Linda Wiemer [mailto:lwiemer@comcast.net]  
**Sent:** Monday, November 27, 2017 4:53 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.

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Linda Wiemer  
lwiemer@comcast.net  
20229 134th Ave NE  
Woodinville, Washington 98072

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SRCAA ATTN Margee Chambers  
3104 E. Augusta Ave  
Spokane, Wa 99207

SRCAA

re: Proposed Marijuana odor regulations

My name is Daniel Miller 6104 West  
Deno Rd, Spokane, Wa 99224. I live  
approximately 1/2 mile east of the grow and  
processing farm located at 6804 Deno Rd on  
the West plains, I have filed odor complaints  
of this facility with SRCAA in the past.

I am not against the processing of pot,  
but there must be a line between industry  
and the effects of the public.

It is a new trade and the growers must  
realize regulations for almost all businesses  
change over time to accommodate the public.

It is not over regulation when production  
of these products adversely affect homeowners  
outside the boundaries of their operation.

(\* Remember the odor problems of Spokane Rock  
Products on the South Hill? \*)

I am in favor of regulations controlling  
the odor associated with the growing

and processing, indoor, outdoor, existing farms, expanded or new facilities that escape their boundaries.

I have experienced more offensive odors on Friday nights and weekends. This may be a coincidence or do processors change production methods when clean air inspectors are not available.

If regulations are adopted and an additional enforcement investigator is retained, I would suggest the officer be on a rotating shift so compliance and random inspection could occur on weekends as well.

Thank you  
Daniel Miller

DANIEL E MILLER  
6104 W DENO RD  
SPOKANE, WA 99224

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**From:** Alan Terry <[info@actionnetwork.org](mailto:info@actionnetwork.org)>  
**Date:** November 22, 2017 at 8:31:55 AM HST  
**To:** [afrench@spokanecounty.org](mailto:afrench@spokanecounty.org)  
**Subject:** Comment for the record; newly proposed mj zoning amendments  
**Reply-To:** [actrite8@yahoo.com](mailto:actrite8@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.

Alan Terry

[actrite8@yahoo.com](mailto:actrite8@yahoo.com)

1419 S. Wilbur road

spokane valley, Washington 99206

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**Note: 4 emails originating from the commenter were received. Some to SRCAA and some to Spokane Co. and forwarded to SRCAA resulting in duplication.**

**Email regarding county zoning rulemaking:**

**From:** Alex Kwan <[kwandai@hotmail.com](mailto:kwandai@hotmail.com)>

**Date:** November 21, 2017 at 3:38:04 AM HST

**To:** "[mmaynard@spokanecounty.org](mailto:mmaynard@spokanecounty.org)" <[mmaynard@spokanecounty.org](mailto:mmaynard@spokanecounty.org)>, "[jkerns@spokanecounty.org](mailto:jkerns@spokanecounty.org)" <[jkerns@spokanecounty.org](mailto:jkerns@spokanecounty.org)>, "[afrench@spokanecounty.org](mailto:afrench@spokanecounty.org)" <[afrench@spokanecounty.org](mailto:afrench@spokanecounty.org)>, "[mkuney@spokanecounty.org](mailto:mkuney@spokanecounty.org)" <[mkuney@spokanecounty.org](mailto:mkuney@spokanecounty.org)>, "[gvasquez@spokanecounty.org](mailto:gvasquez@spokanecounty.org)" <[gvasquez@spokanecounty.org](mailto:gvasquez@spokanecounty.org)>

**Subject: Comment for the Record; Newly Proposed MJ Zoning Amendments**

My name is Alan Talbott, I am the owner of Majico Farm.

I have reviewed your recently proposed zoning ordinance for marijuana farms and a number of provisions concern me.

- First, I strongly oppose the modification of the definition of agriculture to exclude marijuana cultivation. Marijuana is a plant and the cultivation of cannabis most closely mirrors the agricultural industry. Washington LNI classifies cannabis farm workers as agriculture workers and WSDA regulates the types of fertilizers and pesticides we can use. The county should not create it's own definition that negatively impacts our businesses.
- Second, I am opposed to increasing the rear and side property line setbacks from 50' to 100'. This proposed action is unreasonable and it deprives property owners of the use of a substantial amount of land for the purposes that they desire. And it is true that most cannabis farmers have never had a complaint from their neighbors.
- Third, I strongly oppose the requirement for a CUP process for farms seeking permits for expansion or construction. The proposed process is very expensive and time consuming for both the farmers and the county, and it will drive farms and economic activity away from the county.

In Spokane County there are 138 cannabis farms, or 138 small businesses that employ more than 1,100 people. And in 2016 these farms have generated more than \$62 million in gross revenue on a combined acreage of less than 50 acres. This industry is still in it's infancy and farmers need to be able to reinvest and grow their business to remain competitive, and the proposed over-regulation stifles their ability to do so.

The cannabis industry is growing and nationwide legalization will eventually happen. Farmers in Spokane County should be leading the nation to foster the long term viability of the cannabis industry to bring in additional revenue and jobs to our county. The proposed over-regulation stifles growth, scares away investment, and transfers the opportunities from the small business owners in Spokane County to businesses located in other counties.

Alan

**Email regarding SRCAA rulemaking:**

**From:** Majico [mailto:mtmajico@gmail.com]

**Sent:** Thursday, December 07, 2017 5:22 AM

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

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

My name is Alan Talbott and I am co-owner of Majico Cannabis Farm. Our farm is located in Spokane County and will be subject to the proposed rules and fees. The fees are particularly onerous for our farm, as we are a small family-operated farm of modest means. In fact, the proposed fees would be roughly 20% of our gross income for all of 2017.

Our farm cannot handle the proposed fees. We are already subject to very strict regulations: the WSLCB increased licensing fees by 42% this year, the county is increasing permitting costs, testing fees have increased 50% due to regulatory change, and our industry is prohibited from taking many standard tax deductions. I fear these additional rules and fees may be enough of an additional burden that could lead to the closure of our business. We would then try to sell our license and the purchaser of the license would almost certainly move the operation outside of Spokane County to avoid these unreasonable rules and fees.

Our farm is an outdoor farm and it appears that the rules discourages the operation of outdoor farms and provides incentives for operations that grow indoors. This conflicts with the state clean air act that aims to reduce negative environmental impacts. Our farm uses the clean free energy from the sun so our outdoor cultivation has a significantly smaller overall carbon footprint than indoor cultivation.

I understand that the SRCAA's own analysis of the odors associated with cannabis identified alpha-pinene as the most prevalent monoterpene released. This is the same monoterpene released by pine trees. If SRCAA believes this is a contaminant then it must treat all emitters equally and fairly, so all property owners in the county who have ponderosa pine trees on their property must also fall under the proposed rules and be regulated by the agency. This is obviously unfeasible and it highlights how unreasonable the proposed rules and fees are.

Therefore I view the proposed rules and fees to be discriminatory. According to the information in the SRCAA fact sheet over 67% of all producers in the county are not associated with a single complaint. Hitting small producers with these fees will be counterproductive, will lead to the loss of jobs, loss of tax revenue, and will eventually result in cannabis producers fleeing the county to relocate to other counties that do not impose unreasonable and discriminatory rules and fees.

Alan

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**Note: 5 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:** Steve Simmons [mailto:info@actionnetwork.org]  
**Sent:** Tuesday, November 28, 2017 2:32 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.

I have worked with Yield Farms for almost 2 years and this is my only source of income. These proposed fees that are insanely high could potentially put us and other small farms out of business.

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.

Steve Simmons  
dougiedazed74@gmail.com  
2805 E Nora Ave  
Spokane, Washington 99207

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

**From:** Steve Simmons <[info@actionnetwork.org](mailto:info@actionnetwork.org)>

**Date:** November 28, 2017 at 2:32:22 PM PST

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

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

**Reply-To:** [dougiedazed74@gmail.com](mailto:dougiedazed74@gmail.com)

Al French,

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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

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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.

Steve Simmons  
[dougiedazed74@gmail.com](mailto:dougiedazed74@gmail.com)  
2805 E Nora Ave  
Spokane, Washington 99207

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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:** BRANDI WILLARD [mailto:ORDER420NATURAL@GMAIL.COM]  
**Sent:** Tuesday, November 28, 2017 3:03 PM  
**To:** Public Comment  
**Subject:** Comment for the record; proposed MJ SRCAA rules and fees

Margee Chambers,

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BRANDI WILLARD  
ORDER420NATURAL@GMAIL.COM  
9730 LATHROP INDUSTRIAL DRIVE STE D1  
TUMWATER, Washington 98512

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