



City of Placerville
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August 14, 2018

Lori Ajax, Chief
 Bureau of Cannabis Control
 P.O. Box 419106
 Rancho Cordova, CA 95741
 Submitted via Email: bcc.comments@dca.ca.gov

RE: Bureau of Cannabis Control Proposed Regulations – July 2018

Dear Chief Ajax:

The City of Placerville appreciates the opportunity to comment on the proposed regulations released in July 2018, which seek to codify the emergency regulations implemented in December 2017.

The City of Placerville strongly objects to two proposed changes that we view are in fundamental conflict with both the language and intent of Proposition 64 and will undermine our city's ability to effectively regulate cannabis at the local level:

- Section 5416(d), would drastically preempt local control and regulatory authority by authorizing cannabis delivery anywhere in the state regardless of conflicting local regulations or bans, and
- Sections 5001(c) (11) and 5002(c) (28) would undermine the ability of local agencies to ensure community standards are met by reducing from 60 to 10 days the period to verify if a licensee has obtained necessary local approvals.

The City of Placerville believes the two proposed regulations go beyond the BCC's regulatory authority and instead create a new cannabis policy outside of the legislative process. California's voters were assured that "64 preserves local control"¹ and these regulations chip away at the very foundation of local control by allowing cannabis deliveries to every jurisdiction in California.

The City of Placerville is currently following an extensive public participation process to consider what types of cannabis business types should be allowed. This is a decision that should be made by the people who live in Placerville, not the State who does not know the individual preferences of the community. The State must allow the local public process to determine what cannabis business types should be permitted.

For these reasons, the City of Placerville respectfully opposes these regulations until such time as they are amended to address the concerns listed above. We look forward to continued opportunities to comment on specific regulatory proposals.

Sincerely,

Wendy Thomas, Mayor
 City of Placerville

cc:

Charles Anderson, League Regional Public Affairs Manager, canderson@cacities.org
 Meg Desmond, League of California Cities, cityletters@cacities.org

¹ (Ballot Pamp., General Elec. (November 8, 2016) rebuttal to Argument against Prop. 64, p. 99.)