

To: The Honorable Members of the Planning and Land Use Management Committee
From: Sarah Armstrong JD
Americans for Safe Access – Southern California
Re: Tuesday November 3, 2021, PLUM Meeting – Agenda Item No. 13 CF 21-1083
Motion for Ordinance Implementing Cannabis Licensing Changes

Dear Honorable Members of the Planning and Land Use Management Committee:

Our organization respectfully requests, that as the motion referenced above moves through committee, that the Department of Cannabis Regulation (the DCR) be provided with whatever tools it needs to fulfill the requirements of the motion. The motion mandates numerous labor intensive and time sensitive activities and changes, which cannot be achieved unless the DCR is provided with additional resources.

Authorization of overtime, the ability to hire third party companies, increased staffing and budget allocations are traditionally complex transactions within the City bureaucracy. The DCR will need help from the City Council to ensure red tape or other delays do not so impair the Department that it cannot accomplish what the Council is asking for in the allotted time period.

Currently, what the City is asking is akin to hiring someone to build a bonus room in a house, while simultaneously withholding the building materials required to construct the addition. And if this is the case, no matter how hard Ms. Packer and her team try, they will be unable to comply with the Council's directions.

This motion arises from changes stakeholders need to move forward. But as Ms. Packer has pointed out in the report she wrote pursuant to the motion¹ it needs numerous revisions. For instance, the motion would currently facilitate predatory practices by allowing unscrupulous actors to submit endless modifications or otherwise circumvent DCR oversight.

For the reasons stated above Americans for Safe Access respectfully requests, that as the motion moves through its various committees, committee members facilitate the acquisition of whatever resources the DCR may need to comply with the City's instructions and work with Ms. Packer to appropriately revise the motion.



Founded in 2002, ASA is the largest national nonprofit organization of patients, medical cannabis providers, medical professionals, scientists, and concerned citizens promoting safe and legal access to cannabis for therapeutic use and research, with over 100,000 advocates in all 50 states.

Thank you for your consideration of the above matters. I can be reached at (805) 279-8229 or industry@safeaccessnow.org if there are any questions or concerns.

Regards,



Sarah Armstrong JD
Americans for Safe Access
Southern California

Cc: The Los Angeles City Council
Council Staff Attached to the Cannabis Issue
The Honorable Mayor Garcetti
Mayoral Staff Attached to the Cannabis Issue
The Honorable Michael Feuer
Leela Kapur, Esq.

¹ Ms. Packer's report can be accessed at: <https://cannabis.lacity.org/sites/g/files/wph1726/files/2021-10/FINAL%20REPORT%20-%20DCR%20Response%20%20CF%2021-1083.pdf> See page 12 of the report for an explanation of how changes proposed by the motion facilitate predatory practices.



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