

From: "Michael Mangarelli" <michaelmangarelli@hotmail.com>

To: CannabisEIR <CannabisEIR@santacruzcounty.us>

Date: 10/26/2017 3:49:48 PM

Subject: Addendum to Previous Comment

To Whom It May Concern,

Good day, hope you are well. I've previously sent two separate comments on behalf of edibles manufacturer clients. My most recent comment addressed concerns related to an 800 ft buffer prohibition against infusion edibles being manufactured that close to a school or educational institution. Specifically, such a prohibition would essentially drive edibles manufacturers out of the county due to a lack of commercial kitchen spaces that are both located in unincorporated areas and aren't located too close to an educational institution.

Subsequent research for an L.A.-area based client revealed how that locality (the City of Los Angeles) provides an exception to the 800 ft buffer for "commercial cannabis activity" under a limited set of circumstances. I pass it on as an example that could be considered to help avoid a shortage of permissible and adequate commercial kitchen space for edibles manufacturers in this county. Specifically:

Exception. Any Commercial Cannabis Activity with sales to the public limited to off-site deliveries and having no onsite sales shall not be required to be located outside of the 800-foot radius.

Once again, thank you for your efforts and consideration in this regard. All the best.

Cordially,

Michael Mangarelli
Attorney At Law