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June 5, 2017

Department of Consumer Affairs  
Bureau of Medical Cannabis Regulation  
Regulatory Office  
P.O. Box 138200  
Sacramento CA 95813-8200

**Re: Comments on Proposed Medical Cannabis Manufacturing Regulations**

Dear Regulatory Office,

The purpose of this letter is to provide comments on the proposed Medical Cannabis Manufacturing Regulations on behalf of the Santa Barbara County Public Health Department. Our comments are in sequential order of page number and code section.

1. Page 8, Section 5006 (25)

- a. This section states that an applicant shall provide evidence that the proposed location is at least a 600-foot radius from a school as required by the Health and Safety Code. We suggest:
  - i. Clarifying if the 600 feet measurement begins at the outer perimeter of a school property or is 600 feet from the actual school building. As written, it is unclear if the 600 feet measurement begins at the school's front door, parking lot, or perimeter and could be interpreted differently by different licensees.
  - ii. Clarify the definition of "school" either in Section 5000 Definitions or in this section
  - iii. We suggest the definition of "school" explicitly include all public and private schools, universities, colleges, licensed pre-schools, and Head Start locations
    1. The rationale to include colleges and universities is based on the fact that the majority of their undergraduate students are under age 21

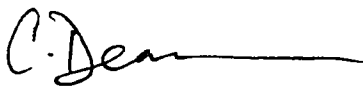
2. Page 20, Section 5050

- a. We support these robust track and trace requirements. Such requirements will help facilitate quick investigations into adverse health events related to a specific cannabis lot.

3. Page 38, Section 5124 (a)
  - a. We suggest not using the word “unmanned” which appears in (a). This word is antiquated and gender-specific. We suggest using alternate words such as “unstaffed”, “unsupervised”, or “unmanaged”.
4. Page 46, Section 5178
  - a. We support the language in (a) prohibiting dispensaries from providing free samples
  - b. We support the language in (b) prohibiting representatives of other companies from providing free samples
  - c. Our rationale for this support is based on a desire to protect the public’s health by preventing easier access for underage individuals
5. Additional Items
  - a. On-site consumption
    - i. These regulations do not explicitly discuss on-site consumption of cannabis at manufacturing facilities or dispensaries. We suggest on-site consumption not be allowed at this time.
  - b. Food Retailers
    - i. These regulations do not explicitly discuss if a dispensary may also operate as a food retailer such as a coffee shop or sandwich shop. We suggest this not be allowed at this time.

Thank you for the opportunity to provide input on these proposed regulations. The thorough framework they establish will be important in protecting the public’s health. We look forward to ongoing partnership.

Sincerely,



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