From: Yvonne DeLaRosa
To: Office of Cannabis Management
Cc: Yvonne
Subject: Formal Public Comment
Date: Monday, July 20, 2026 4:13:06 PM

CAUTION: External Email. Proceed Responsibly.

Public Comment Regarding Los Angeles County's Proposed Commercial Cannabis Licensing Framework
Request for a Fair, Sustainable, and Legacy-Inclusive Licensing Process

To the Los Angeles County Office of Cannabis Management and Honorable Members of the Los Angeles County Board of Supervisors,

My name is **Yvonne DeLaRosa Green**, and I respectfully submit this comment regarding the development of Los Angeles County's commercial cannabis licensing framework.

I bring more than **20 years of experience in legal cannabis operations**, having witnessed firsthand the transformation of this industry from its medical cannabis origins into today's regulated marketplace. I support responsible regulation, community protections, and thoughtful oversight. However, I strongly urge Los Angeles County to reconsider one of the most consequential aspects of the proposed licensing process: requiring operators to secure commercial real estate before receiving meaningful assurance that they will be granted a license.

With all due respect, this process is backwards.

A licensing system that requires an applicant to first acquire property places enormous financial risk on the very people who have built and sustained this industry. Before receiving approval, operators are forced into negotiations with landlords, required to commit substantial capital, and often expected to carry expensive commercial leases while navigating lengthy regulatory processes with no guarantee of success.

This requirement unintentionally creates a system where access to real estate—not experience, compliance history, operational excellence, or community contribution—becomes one of the largest determining factors in who can participate.

This structure disproportionately benefits large, well-capitalized corporations while placing legacy operators and community-based businesses at a disadvantage. Many legacy operators have spent decades developing responsible operations, serving patients and consumers, and contributing to the culture and values that shaped cannabis in California long before legalization created a commercial marketplace.

The County should not create a system where the people who helped build this industry are displaced by those with greater access to capital.

The Real Estate Barrier and Landlord Exploitation

Another unintended consequence of requiring property control before licensing is that it creates an environment where some property owners gain excessive leverage over cannabis applicants.

Because a cannabis license is tied to a specific location, landlords may recognize that a licensed location carries unique value and use that leverage to demand dramatically inflated rents. In some cases, operators have reported experiencing rental increases multiple times above normal market rates once a cannabis use becomes associated with the property.

This creates a dangerous imbalance: an operator may successfully navigate a complex licensing process, invest hundreds of thousands or millions of dollars into compliance and buildout, and then find that escalating rent obligations make the business financially unsustainable.

The result is that the license holder—not the landlord—assumes nearly all of the risk, while the value created by the operator's hard work can become attached to the real estate itself.

Annual rent increases that continue unchecked can ultimately force otherwise successful businesses to close their doors. A brick-and-mortar cannabis business can be compliant, responsible, and community-oriented, yet still fail because occupancy costs become impossible to sustain.

A licensing system should not unintentionally create a pathway where real estate speculation becomes more powerful than entrepreneurship, operational expertise, or community commitment.

Recommended Licensing Reforms

I respectfully encourage Los Angeles County to adopt a more balanced and equitable framework that includes the following:

1. Conditional License Approval Before Property Commitment

The County should consider awarding conditional approvals based on an applicant's qualifications, experience, compliance history, business plan, financial responsibility, and ability to operate safely.

Once conditionally approved, applicants could then secure a compliant property within a defined timeframe. This preserves zoning review and community protections while eliminating unnecessary financial risk.

2. Allow Licenses to Move to Another Qualifying Property

A cannabis license should not become permanently tied to a landlord or a single parcel of real estate.

The County should create a process allowing a licensed operator to relocate that license to another qualifying property, subject to zoning, inspections, and regulatory approval.

This protection is essential to prevent situations where landlords attempt to gain control of a valuable license by using lease negotiations, rent increases, or other pressures against tenant

operators. The value of a license should remain with the licensed operator who earned it—not automatically transfer to a property owner.

3. Protect Independent Operators and Encourage Long-Term Sustainability

A successful cannabis program should not only focus on issuing licenses; it should focus on creating conditions where licensed businesses can survive.

A system that allows qualified operators to enter the market but leaves them vulnerable to unsustainable real estate costs does not create a healthy industry. It creates a cycle where independent operators are replaced by entities with greater access to capital and less connection to the communities they serve.

A Chance to Honor Cannabis' History While Building Its Future

Los Angeles County has an opportunity to create a model that balances regulation, public safety, economic opportunity, and respect for the history of cannabis in California.

The original intention of cannabis legalization was not simply to create another commercial sector. It was also to recognize the contributions of people who built this industry, often under difficult circumstances, and to create a safer, more accountable, and more inclusive future.

A licensing system that prioritizes experience, responsibility, and community investment—while preventing unnecessary real estate barriers—will better serve residents, consumers, and the long-term success of the industry.

I respectfully ask Los Angeles County to consider a **"license-first, property-second" approach** and to ensure that licenses remain portable to qualifying locations so that operators, not landlords or speculative interests, retain the value they have earned.

Thank you for your consideration and for the opportunity to participate in shaping the future of cannabis regulation in Los Angeles County.

Respectfully,

Yvonne DeLaRosa Green/ CEO 99 High Tide- Malibu- LA COUNTY's First and Only Cannabis Business license holder.

[redacted]

From: Sittig, Dylan
To: Office of Cannabis Management; Connie Chung; Edward Rojas
Cc: C. Carrier
Subject: Re: Commercial Cannabis Zoning Ordinance - Notice of Public Hearing
Date: Thursday, July 23, 2026 1:33:18 PM
Attachments: Outlook-pn1hy4xp.png

CAUTION: External Email. Proceed Responsibly.

Hello Connie, Edward, and other staff,

Please see Carrie's email with a question related to this proposed ordinance. Can you please respond?

Thank you,
Dylan

Dylan Sittig
he/him
Regional Planning Deputy
P: 213.974.3333 | lindseyhorvath.lacounty.gov

From: C. Carrier [redacted]
Sent: Thursday, July 23, 2026 1:26 PM
To: Sittig, Dylan <DSittig@bos.lacounty.gov>
Subject: Fwd: Commercial Cannabis Zoning Ordinance - Notice of Public Hearing

These aren't going to be allowed in Topanga, right?

---------- Forwarded message ---------
From: **LA County Planning** <webadmin@planning.lacounty.gov>
Date: Thu, Jul 23, 2026 at 1:01 PM
Subject: Commercial Cannabis Zoning Ordinance - Notice of Public Hearing
To: [redacted]

From: John Aitchison
To: Office of Cannabis Management
Subject: New Regulations
Date: Thursday, July 23, 2026 4:31:45 PM

CAUTION: External Email. Proceed Responsibly.

What's the difference? The vast majority of Cannabis Shops are unlicensed. Unless the police raid those unlicensed shops, nothing will change.

From: Rameen Mansour
To: Office of Cannabis Management
Subject: Cannabis and social equity
Date: Thursday, July 23, 2026 4:46:27 PM

CAUTION: External Email. Proceed Responsibly.

Hello -

I'm trying to understand where things are at with the county's licensing process.

Did the county already verify potential social equity applicants? I can't find the criteria for a social equity applicant on the website.

I thought at one point the applicant had, had to have lived in an unincorporated area of LA for a certain period of time, and have an arrest etc.

What is the final criteria and what are the next steps ?

Rameen Mansour
[redacted]

From: Rene Guzman ABC DEFENDERS
To: County of Los Angeles; Office of Cannabis Management
Subject: Re: Commercial Cannabis Regulatory Program: Notice of Public Hearing and Final Environmental Impact Report Release
Date: Thursday, July 23, 2026 5:36:38 PM

CAUTION: External Email. Proceed Responsibly.

To prepare for the hearing in August I'm making a formal request of the following:

Copy of the entire okd and newly proposed Zoning Ordinance Title 22 (Planning and Zoning) of the Los Angeles County Code.

Copy of the Final PEIR.

Cooy of the County's Mitigation Monitoring and Reporting Program (MMRP).
Is this request requires a PRA, this is a formal email under the government code for PRA request and a 10-day response by state law.

On Thu, Jul 23, 2026, 4:25 PM County of Los Angeles <lacounty@subscriptions.lacounty.gov> wrote:

> Translate / View as Webpage

From: [redacted]
To: Office of Cannabis Management
Subject: Cannabis Program LA County Unincorporated Areas
Date: Thursday, July 23, 2026 6:24:08 PM

CAUTION: External Email. Proceed Responsibly.

Hello,

I understand you're holding public hearings about the Cannabis Program for LA County Unincorporated Areas. If everything passes, when do you aproximately estimate that retail storefronts can begin applying for approval? I just want to make sure that I don't miss the opportunity.

Sincerely,

Marty M

From: Elisa Stern
To: Office of Cannabis Management
Subject: Commercial Marijuana
Date: Thursday, July 23, 2026 9:01:15 PM

CAUTION: External Email. Proceed Responsibly.

To whom it may concern,

I am beyond disgusted with how Agua Dulce and Acton are treated. Just because we are unincorporated does not mean we are in the middle of nowhere. Our zip code even comes up as Santa Clarita or Saugus. We are constantly under attack by changes in zoning pushing for projects like BESS battery storage facilities in the highest fire zones where we Can't even get insurance. We have no law enforcement available to us as we are assigned to Palmdale and they are always busy with Lancaster crime. We have to maintain our own roads. We are well dependent and water is already at an all time low. We pay the same property taxes as Valencia with law enforcement near by and available. I know a couple of people that had illegal grow houses take over neighboring homes who have had to sell at a loss and move away. Their houses were permeated by the stench. Their children couldn't play outside anymore due to the smell and unsavory characters that come and go at all hours. There have been increased cartel and gang activity due to turf and theft. And you say it is okay to open a retail store within 600 feet of a school or rehab center. Who can't walk 600' to obtain drugs? And you are proposing a big cultivating zone on Davenport just below Agua Dulce Canyon Rd. You obviously have no idea how sound travels and the wind blows through this area. Smells and sounds will impact people for a mile or maybe more. We also know from all the illegal dumping that these facilities do, due of the bottles of chemicals all around our community how this can impact a well dependent community's ground water.

If you aren't willing to have this Nextdoor to your home or your children's school, then don't try and put it next to mine!

Elisa Mortimer
Sent from my iPhone

From:	Tracie Lyons
To:	Fernando Nieto; Office of Cannabis Management; hollyjmitchell@bos.lacounty.gov
Cc:	Laura Magallanes; Leo, Pamela; Edward Rojas; Caroline Torosis; Williams, Bennie; Latasha James; McGee, Tracy; Desobry Bowens; Amy Bodek; Angela Sherick; Toni McDonald; Debi Wood
Subject:	Submission of LHCA Letters for the Administrative Record
Date:	Monday, July 27, 2026 2:07:07 PM
Attachments:	Cannabis Response.docx LHCA CANNABIS RESPONSE 11.14.24.pdf

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CAUTION: External Email. Proceed Responsibly.

Attached are the following letters submitted on behalf of the Ladera Heights Civic Association ("LHCA") for inclusion in the administrative record for the Regional Planning Commission's August 26 public hearing on the proposed zoning ordinance amendments:

1. LHCA Original Comment Letter dated November 14, 2024; and
2. LHCA Follow-Up Response Letter, submitted in response to the Office of Cannabis Management's correspondence regarding how LHCA's recommendations were addressed in the proposed program.

We respectfully request that both letters be included in the administrative record and provided to the Regional Planning Commission for its consideration as part of the written public comment process.

We also wish to emphasize that our comments are not simply an expression of opposition to cannabis businesses in our community. While we firmly believe that permitting cannabis retail establishments in Ladera Heights is not in the best interest of our community, our letters go beyond expressing that concern. They present thoughtful, carefully considered, and clearly articulated revisions to the proposed regulations that are intended to better protect residents while providing practical, workable solutions to known challenges. These recommendations are informed by our community's lived experience with the cannabis business operating immediately adjacent to Ladera Heights within the City of Los Angeles and reflect lessons learned from the impacts we have observed firsthand.

Thank you for your continued engagement with our community and for ensuring these materials are included in the official record. Please confirm receipt of this submission at your convenience.

Sincerely,

Tracie Lyons
Ladera Heights Civic Association

July 13, 2026

Fernando Nieto
Program Chief
Office of Cannabis Management
Department of Consumer and Business Affairs
320 W. Temple St. Room G-10,
Los Angeles, CA 90012
Los Angeles County Office of Cannabis Management
cannabis@lacounty.gov

Amy J. Bodek, AICP
Director of Regional Planning
Los Angeles County Department of Regional Planning
320 West Temple Street
Los Angeles, California 90012
abodek@planning.lacounty.gov

LA County Supervisor Holly Mitchell
500 W Temple St #866
Los Angeles, CA 90012
hollyjmitchell@bos.lacounty.gov

Re: County's Response to LHCA's Cannabis Regulations letter dated November 14, 2024

Dear Fernando,

We appreciate the County's effort to identify how the Ladera Heights Civic Association's recommendations are addressed in the proposed commercial cannabis licensing framework in your email dated July 2, 2026. After reviewing the document, however, we believe several of the responses either do not fully address the concerns raised by LHCA or substitute alternative approaches that do not provide equivalent protections or opportunities for meaningful community participation.

Attached are our comments responding to several of the County's explanations. Our intent is to clarify why we believe certain recommendations remain important and to offer additional reasoning for the Board's consideration as the regulatory framework continues to be refined.

We respectfully request that these comments be included as part of the administrative record and considered as Title 8 and the implementing regulations are finalized.

Thank you again for your continued engagement with our community. We appreciate the opportunity to provide additional feedback and look forward to continuing the dialogue.

Respectfully,

/s/

Desobry E. Bowens
President
Ladera Heights Civic Association
[redacted]

LHCA Response to County's Proposed Cannabis licensing framework as set forth in Office of Cannabis Management email dated July 2, 2026

LHCA Recommendation - #5 Response

The County's proposed approach does not satisfy the purpose of meaningful community engagement because it delays public involvement until after key licensing decisions have already been made and, in some cases, until after the business has begun operating.

A community meeting held within 30 days after a storefront cannabis business opens is not an opportunity for residents, businesses, or civic organizations to provide meaningful input on whether the proposed location is appropriate. At that stage, the County has already approved the application, the applicant has invested substantial resources, and the business is operational. Community feedback can address complaints or operational issues, but it can no longer influence the licensing decision itself.

The County states that applications may change during the review process and that some applicants may never receive a license. That is true of virtually every land use, planning, and development application considered by the County. Nevertheless, public notice and community input routinely occur early in those processes because the purpose is to identify concerns while changes can still be made. This provides substantial benefit to both the community and the cannabis business.

The possibility that an application may change or ultimately be denied is not a reason to withhold notice. Instead, it is a reason to notify the community early enough for applicants to address concerns, modify site plans, improve operating conditions, or voluntarily select a more suitable location before significant investments have been made by either the applicant or the County.

The County also conflates two distinct forms of public participation. Community involvement in developing Countywide regulations does not replace community input on individual applications. Residents may support a regulated cannabis program while still having legitimate concerns about whether a particular dispensary is appropriate for a specific location in their neighborhood. Those are separate questions requiring separate opportunities for public participation.

A post-opening community meeting and a Community Liaison are valuable tools for resolving operational issues, but they are not substitutes for meaningful public

participation during the licensing process. Community engagement should occur before licensing decisions are effectively finalized, when public input can still influence the outcome rather than simply respond to it.

The County should require notice and a community meeting early in the application process before substantial licensing milestones have been completed in order to provide applicants with an opportunity to address community concerns and to ensure residents have a meaningful voice in decisions affecting their neighborhoods.

LHCA Recommendation - #6 Response

The County's proposed alternative does not provide equivalent notice to nearby residents and businesses.

Posting a notice on the exterior of a proposed cannabis dispensary assumes that impacted residents and businesses will routinely pass by the location. In reality, many nearby residents intentionally avoid commercial areas where a marijuana dispensary is proposed or may have no reason to travel past the site during the 30-day notice period. As a result, those most affected may never see the posted notice before important decisions are made.

Likewise, relying on an online map or centralized website places the burden on residents to regularly monitor County resources for applications they have no reason to know exist. This is not a realistic expectation for the average resident or small business owner.

The County's administrative concerns regarding mailed notice are outweighed by the importance of meaningful public participation. Local governments routinely provide mailed notices for land use applications, zoning changes, variances, environmental reviews, and public hearings. Extending this established practice to cannabis dispensary applications, particularly those with the potential to affect neighborhood character, public safety, traffic, and nearby businesses is neither novel nor unreasonable.

Moreover, the recommendation intentionally includes properties across jurisdictional boundaries because the impacts of a dispensary do not stop at city limits or jurisdictional lines. Residents and businesses located just outside the County's unincorporated boundary may experience the same impacts as those located within it and deserve the same opportunity to participate.

Meaningful public engagement requires that affected stakeholders receive actual notice, not merely that information exists somewhere if they happen to look for it. Direct mailed

notice to all residents and businesses within 1,000 feet remains the most reliable, transparent, and equitable method of ensuring those most affected have a genuine opportunity to participate in the decision-making process.

LHCA Recommendation - #7 Response

The County's response incorrectly frames this recommendation as a choice between maintaining a public website and creating a community notification registry. The recommendation proposes a voluntary registry as a supplement to, not a replacement for, the County's public transparency efforts.

Publishing information on a website or online map only benefits those who already know when, where and how to search for it. Community and civic organizations, however, often serve as the primary source of information for residents, businesses, homeowners, neighborhood watch groups, faith communities, and other stakeholders. Providing these organizations with direct notice significantly expands public awareness and participation at virtually no cost.

The County also overstates the administrative burden of maintaining a voluntary registry. The County would not need to determine which organizations are "eligible" or designate a single organization to represent a neighborhood. Any community or civic association could simply choose to register and receive notifications for a geographic area or ZIP code of interest. Multiple organizations could register for the same area, ensuring broader, not narrower, distribution of information.

Many government agencies already maintain voluntary email subscription lists that allow individuals and organizations to receive notifications regarding planning applications, environmental reviews, public meetings, road projects, emergency alerts, and other community issues. These systems are inexpensive, easy to administer, and eliminate the need for County staff to make subjective determinations regarding community representation.

Importantly, a voluntary notification registry does not limit access to information or create inequities. The County's website and online map would remain available to everyone exactly as proposed. The registry would simply provide an additional, proactive means of informing organizations that have expressed an interest in receiving notices. This enhances transparency rather than restricting it.

If the County's objective is meaningful community engagement, it should embrace multiple methods of communication rather than relying exclusively on passive publication. A

voluntary notification registry is a practical, low-cost enhancement that leverages existing community networks to ensure that important information reaches residents before decisions affecting their neighborhoods are made.

LHCA Recommendation - #8 Response

See LHCA Recommendation #6 Response

LHCA Recommendation - #10 Response

The County's proposed ownership definition remains too narrow because it focuses primarily on equity ownership and formal management roles while overlooking contractual financial arrangements that can create equal or greater influence over a cannabis business.

For example, an individual with a contractual right to receive 10 percent or more of a dispensary's gross or net profits may exercise substantial influence over business operations despite holding no ownership interest. Such an individual has a direct financial stake in the business's success and may influence pricing, marketing, expansion decisions, operating practices, or compliance decisions through contractual leverage. From a regulatory perspective, that individual may have as much or more influence than a passive investor holding a 20 percent ownership interest.

Similarly, branding agreements, licensing arrangements, management contracts, financing agreements, and affiliated business relationships can provide parties with significant operational or economic control without transferring formal ownership. These relationships are common in commercial enterprises and should not be excluded from regulatory review simply because they do not fit a traditional ownership model.

The County states that these relationships "do not necessarily confer ownership or operational control." That may be true in some cases, but it is equally true that they often do. The existence of relationships that do not create control is not a reason to ignore those that clearly do. The regulations should require disclosure when contractual arrangements provide a person or entity with a substantial financial interest, significant decision-making authority, or the practical ability to influence the operation of the licensed business.

The County also expresses concern that reviewing these relationships would unnecessarily expand the ownership review process. However, this concern can be addressed through objective disclosure thresholds. For example, any person or entity entitled to receive 10

percent or more of the gross revenues, net profits, or other economic benefits of the licensed business should be disclosed and subject to County review, regardless of whether that interest arises through equity ownership, contract, licensing, management, financing, or another business arrangement.

The purpose of ownership disclosure is transparency and accountability. That purpose is not achieved if individuals with substantial economic influence can avoid disclosure simply because their interests are structured through contracts rather than stock certificates or membership units. The regulations should focus on actual influence and economic control, not merely the legal form through which that influence is exercised.

November 14, 2024

Los Angeles County Office of Cannabis Management
320 W. Temple St. Room G-10,
Los Angeles, CA 90012
ATTN: OCM
cannabis@lacounty.gov

Amy J. Bodek, AICP
Director of Regional Planning
Los Angeles County Department of Regional Planning
320 West Temple Street
Los Angeles, California 90012
abodek@planning.lacounty.gov

LA County Supervisor Holly Mitchell
500 W Temple St #866
Los Angeles, CA 90012
hollyjmitchell@bos.lacounty.gov

Re: Proposed Amendments to the Title 22 Cannabis Ordinance – For Public Record

Dear Officials,

The Ladera Heights Civic Association ("LHCA") vigorously objects to the licensing of retail storefront cannabis shops in the Ladera Heights community. As presently drafted, the proposed amendments to the Title 22 Cannabis Ordinance focus solely on the potential economic and tax benefits of cannabis businesses without adequately protecting our predominately African-American community against the neighborhood blight and crime typically arising from liquor stores, smoke shops, cannabis dispensaries and similar nuisance businesses that are overly abundant in minority communities."[1]

As presently drafted, the County's proposed cannabis laws require that cannabis dispensaries be located throughout the unincorporated communities of Los Angeles. However, social equity, a term frequently trumpeted in cannabis legislation, demands that the location of cannabis dispensaries also take into

[1] https://www.pbssocal.org/shows/power-health/liquor-stores-dispensaries-and-smoke-shops-our-neighborhood-is-killing-us

account the historic record of locating nuisance businesses in predominately minority communities for the benefit of a few entrepreneurs and non-local consumers.

While it is the preference of the Ladera community that no additional retail cannabis storefronts be located in our community, we believe that the modification of proposed zoning and licensing laws as set forth below can mitigate further harm to our community while allowing appropriate levels of cannabis business operations as the law requires. As discussed herein, it is apparent that the County will take into consideration the particular needs of a community for purposes of cannabis regulation as it proposes to do for West Carson. LHCA requests similar review and consideration of the unique needs of Ladera Heights in determining how to address the licensing of cannabis dispensaries within our community.

Background:

Ladera Heights is a predominately Black community with a population of more than 6,500 residents. Indeed, more than 70 percent of its population identified themselves as Black and the majority of Ladera Heights residents are homeowners (67.2 percent). LHCA is a civic association representing the owners and renters of those properties located in that portion of the County of Los Angeles and the City of Los Angeles within USPS Zip Codes 90056, and 90302, commonly known as Ladera, Ladera Heights, and the Heights at Ladera in the City of Inglewood (collectively, the "Ladera Community"). As a Section 501(c)(4) organization, LHCA is a not-for-profit entity that has proudly existed since 1955 for the exclusive purpose of promoting the social welfare of the Ladera Community. It is a duty that we do not take lightly.

Primarily located in unincorporated Los Angeles County, relatively small portions of the community are located within – and surrounded by - the cities of Los Angeles and Inglewood, and we are also bordered by Culver City. This jurisdictional serendipity means that zoning decisions made by these surrounding cities (See Exhibit "A" depicting the City's approval of a highly visible, celebrity owned cannabis shop located on the city side of the LA City/Ladera Heights border, directly across the streets from homes in Ladera Heights, and resulting in significant traffic congestions and disruption), directly impact our community; however, again due to the existence of multiple jurisdictions, these zoning decisions come with no electoral accountability to Ladera Heights .

1) **PROPOSED ZONING LOCATIONS FOR BUSINESSES**

"To prevent the overconcentration of cannabis businesses and avoid an effective ban in most areas of the County, the proposed rules align zoning and buffering limits with State law and the County's alcohol outlet zoning ordinances."

The proposed rules align cannabis dispensary zoning and buffering limits with existing off site alcohol outlet ordinances in an attempt to prevent the overconcentration of cannabis businesses. However, this approach risks perpetuating the inequities already present in communities of color, especially Black neighborhoods, which have historically borne a disproportionate burden of liquor store density.

Research has repeatedly shown that liquor stores are overrepresented in these areas, contributing to significant public health challenges, including higher rates of alcohol-related harm and social instability. As one scholar put it, liquor stores exist in an "antagonistic relationship" with Black communities—one that benefits businesses but inflicts harm on the health and well-being of residents." [2]

[2] The Corner Liquor Store: Rethinking Toxicity in the Black Metropolis , Naa Oyo A Kwate [1]

In light of this, in order to avoid perpetuating patterns of harm that have occurred as a direct result of the County's existing alcohol outlet ordinances, we strongly urge the County not to align cannabis business zoning with alcohol outlet ordinances, but instead mandate a buffering distance of <u>not less than 1000 feet</u> from youth oriented and sensitive uses. In the event, the County is unwilling to protect its residents with such increased buffer zones, LHCA strongly recommends the following revisions to the proposed amendments in all unincorporated areas based upon Los Angeles City regulations:

County Proposed Amendment	LHCA Proposed Amendment
F-2 Buffers. The following location requirements shall replace the distance restrictions of State law, Business and Professions Code Section 26054: a. The property boundary of a commercial cannabis business shall not be located within **600** feet of the property boundary of a **youth-oriented use**, as defined in Section 22.14.030 (C), in accordance with Section 22.04.050.B (Rules for Measurement). A legally established cannabis business that has been continuously operating in compliance with the approved County Cannabis Business Permit, this Title 22, and other local and State laws will not be affected by any new youth-oriented use subsequently located within this buffer. b. The property boundary of a storefront retail cannabis business shall not be located within **500** feet of the property boundary of any other storefront retail cannabis business permitted by the County or another local jurisdiction, and/or licensed by the State.	**F-2 Buffers.**. The following location requirements shall replace the distance restrictions of State law, Business and Professions Code Section 26054: a. The property boundary of a commercial cannabis business shall not be located within **700** feet of the property boundary of a **youth-oriented use**, as defined in Section 22.14.030 (C), in accordance with Section 22.04.050.B (Rules for Measurement). b. The property boundary of a commercial cannabis business shall not be located within **700** feet of the property boundary of a **sensitive use**, as defined in Section 22.14.030 (D), in accordance with Section 22.04.050.B (Rules for Measurement). A legally established cannabis business that has been continuously operating in compliance with the approved County Cannabis Business Permit, this Title 22, and other local and State laws will not be affected by **any new youth-oriented use or sensitive use** subsequently located within this buffer. c. The property boundary of a storefront retail cannabis business shall not be located within **700** feet of the property boundary of any other storefront retail cannabis business permitted by the County or another local jurisdiction, and/or licensed by the State. **See LA City Cannabis law**
youth-oriented use, as defined in Section 22.14.030 (C),	**youth-oriented use**, should be defined in Section 22.14.030 (C), to **include parks located in neighboring cities or unincorporated areas, as well as within 700 feet of "OS" zoned properties** that are used as park and recreation facilities, including but not limited to trails, lawn areas, play areas, picnic facilities, and athletic fields. **See LA City Cannabis law**

Sensitive Use – not included. LA City includes such properties.	**Sensitive Use**" means an Alcoholism or Drug Abuse Recovery or Treatment Facility, and/or Permanent Supportive Housing, or Places of Worship. (a) Alcoholism or Drug Abuse Recovery or Treatment Facilities shall be identified on the official website for the California Department of Health Care Services; (b) Permanent Supportive Housing shall be identified on the LA City's Open Data Portal list titled "HCIDLA Affordable Housing Projects List (2003 to Present)", or as may be amended (c) "Places of Worship" shall be identified as locations where individuals gather to engage in religious practices, including without limitation, churches, mosques, synagogues, temples, and shrines. **See LA City Cannabis law**
F-3.Signage. All signage and advertising at the commercial cannabis business shall comply with the requirements of Chapter 22.114 (Signs).	**F-3.Signage.** All signage and advertising at the commercial cannabis business shall comply with the requirements of Chapter 22.114 (Signs). **Additional requirements- Signage should be proportionate with other community signage. See signage on Exhibit "A" as example of problem.**

2) GOOD NEIGHBOR POLICY & CORPORATE SOCIAL RESPONSIBILITY

Applicants for new permits or renewals are required to host a community meeting prior to receiving their permit under proposed County cannabis licensing requirements. **However, if community engagement is truly the goal rather than a performative check the box meeting, the County should require that stakeholders be meaningfully engaged in the process.** In order to ensure such engagement, LHCA recommends that:

a) Initial Notice at the Front End of the Application Process
Requiring early communication about the licensing process allows all stakeholders—businesses, residents, and civic groups—to understand what is being proposed before the process moves too far along. This also provides time for feedback and discussion, allowing the dispensary applicant to address concerns or adjust plans as needed. Most importantly, it prevents the feeling that the community is being blindsided or excluded from the decision-making process.

b) Notice to Businesses and Residents Within 1000 Feet
Requiring notice to all businesses and residents within a 1000-foot radius (regardless of jurisdiction) ensures that those most likely to be directly impacted by the dispensary are

informed. This is especially important in multi-jurisdiction locations, as well as urban or densely populated areas, where people may not be aware of a new dispensary opening nearby until it's too late. By giving notice to those community members that will be most impacted by the opening of a dispensary, the County shows a commitment to transparency and respect for local concerns.

c) Notice to Community and Civic Associations Registered with the Office of Cannabis Management (OCM)

The County should allow community and civic associations to register with the OCM. Once registered, those associations would be provided notice of any proposed dispensary being opened in or adjacent to the areas the association serves. Engaging with community and civic organizations is a critical way to reach a broader group of stakeholders. These groups are often trusted voices within the community and have the resources and networks to disseminate information effectively. By including them in the process, the County is supporting an inclusive approach to outreach that taps into established community structures, making it easier to disseminate information.

d) 30-Day Notice Period

A reasonable time frame such as 30 days ensures all stakeholders have ample time to prepare, attend, and participate in the required community meeting. This allows businesses and residents to ask questions, voice concerns, and have meaningful discussions while allowing applicants time to make adjustments to their plans if needed, based on community feedback.

By implementing the foregoing changes, the County can ensure optimal operations for dispensaries, reduce conflicts with residents and businesses, and foster more positive community relationships by requiring meaningful engagement by all stakeholders.

3) PROHIBITED ACTIVITIES & PROHIBITED OWNERS

PROHIBITED ACTIVITIES:

While temporary or special events are prohibited under Title 22, Section 22.140.134, there is no stated penalty for such events. Ladera has already experienced such events in the past with City licensed cannabis dispensaries which have negatively impacted nearby businesses, community residents and traffic. **LHCA proposes that a significant penalty or fine be set forth in Section 22.140.134 to dissuade dispensaries from engaging in such violations.** By setting clear and escalating fines, dispensaries will have a financial incentive to adhere to the rules, thereby reducing the likelihood and frequency of prohibited events.

PROHIBITED OWNERS:

To ensure thorough due diligence in the review of cannabis dispensary ownership, the definition of a "cannabis dispensary owner" should be expanded to encompass a broader range of individuals and entities. This would help to capture the full scope of potential influence and control over the dispensary's operations, and ensure compliance with regulatory, financial, and operational standards. **LHCA recommends a more inclusive definition of owner**:

Expanded Definition of "Cannabis Dispensary Owner":

a) **Indirect Ownership**:
   Individuals or entities that may not hold direct ownership but have control or influence over the dispensary through other means. This includes:
   i) **Beneficial owners**: Those who enjoy the benefits of ownership, even if the title is held by another party.
   ii) **Intermediary or holding companies**: Individuals or entities that own shares in a parent or intermediary company that in turn owns the dispensary.
   iii) **Silent or passive investors**: Investors whose involvement is not operational but who still hold a financial interest or control in the dispensary's profits or losses.
b) **Affiliated Entities**:
   Any individual, companies or businesses that provide significant services, products, or financing to the dispensary, where such relationship could imply indirect influence over the dispensary's operations or compliance. This includes landlords, service providers, brand ambassadors and suppliers who maintain significant financial, or operational relationships.
c) **Governance Influence**:
   Individuals who may not be direct owners but who hold governance roles (e.g., board members or advisors) or have substantial influence in corporate decision-making and strategic direction.
d) **Branding, Licensing or Influencer Relationships**:
   Any person who, though not directly involved in ownership, might exert influence or control through branding, licensing or influencer relationships with the actual owners or operators of the dispensary. This may include people or entities with significant financial interests or other ties that may influence business decisions.

Rationale for a Broader Definition:

a) **Regulatory Compliance**: By expanding the definition, regulators and law enforcement can more effectively identify any entities or individuals with the potential to subvert cannabis laws, whether through financial means or control over business practices.
b) **Financial Transparency**: A broad definition ensures that all individuals or entities benefiting from the cannabis business are subject to the same scrutiny, especially in terms of money laundering or illicit financing concerns.
c) **Risk Mitigation**: A comprehensive review of ownership structures can help identify potential risks to the business, such as conflicts of interest, non-compliance with local and federal regulations, or associations with criminal enterprises or other problematic entities.
d) **Equity and Fairness**: Expanding the definition ensures that all parties with a stake in the success of the dispensary—whether through direct investment, management influence, or governance—are held accountable for meeting industry standards and regulatory requirements.

This broader ownership definition would ensure that authorities and the community have complete understanding of who truly holds control over cannabis dispensaries, and would promote industry transparency and accountability.

4) EQUITABLE SOLUTIONS FOR VUNERABLE COMMUNITIES

Equity recognizes that communities have different needs and challenges, so policies should be tailored accordingly. As previously noted, an analysis of the placement of alcohol and cannabis stores has shown that dispensaries tend to cluster in areas with higher rates of racial and ethnic minorities, lower-income

populations and unincorporated communities. This clustering can perpetuate existing inequalities, potentially leading to greater exposure to negative outcomes for already vulnerable communities. One way to counteract this phenomenon is the prohibition of storefront cannabis shops in in such communities. LHCA recognizes that the County does not wish to completely restrict cannabis for these communities, especially for residents who may benefit from it, and therefore recommends that such communities be allowed to utilize non-storefront retail models like delivery services to provide a more balanced approach that reduces potential harms while maintaining equitable access for community residents.

Ladera Heights desires an equitable, community-tailored solution to cannabis distribution. Accordingly, LHCA requests that the County provide Ladera a more discreet, lower-impact way of accessing cannabis, while reducing potential negative externalities such as increased crime, traffic congestion, or public disturbances by prohibiting storefront dispensaries and allowing non-storefront retail models as it currently proposes for communities like West Carson. This would provide a more balanced approach that reduces potential harms while maintaining equitable access.

LHCA believes that prohibiting storefront cannabis shops while allowing non-storefront retail options in vulnerable communities strikes a balance between equity and equality. It recognizes the unique needs of different neighborhoods and provides tailored solutions that minimize harm, while still ensuring equitable access to cannabis. This approach could help foster a more equitable and responsible cannabis market, while addressing the concerns of communities that might otherwise be disproportionately impacted by the overconcentration of cannabis retail outlets. By prioritizing the health and well-being of vulnerable communities, particularly those who have historically faced discrimination or systemic harm, the County can ensure that the cannabis market functions in a way that is both inclusive and protective of all residents.

Conclusion:

LHCA respectfully urges the County to

i) Reconsider aligning cannabis business zoning with alcohol outlet ordinances, as it risks perpetuating similar patterns of harm, by requiring buffering distance of not less 1000 feet from youth oriented or sensitive uses.
ii) Require true community engagement by requiring cannabis applicants to contact registered civic associations and community groups as well as business and residents within 1000 feet of retail cannabis establishments to meet with all stakeholders.
iii) Adopt a more inclusive definition of owner to ensure that authorities and the community have complete understanding of who truly holds control over cannabis dispensaries and promote industry transparency and accountability.
iv) Adopt a significant penalty or fine for violations of Section 22.140.134 to dissuade dispensaries from engaging in unauthorized temporary or special events.
v) Prohibit storefront retail cannabis shops in Ladera Heights while allowing non-storefront retail options such as delivery services to reduce potential negative externalities such as increased crime, traffic congestion, or public disturbances as the County currently proposes for communities like West Carson in order to strike a balance between equity and equality.

We look forward to your response and welcome an opportunity to discuss our concerns in greater detail.

Thank you for your attention.

Respectfully,

Desobry E. Bowens
President
Ladera Heights Civic Association
[redacted]

Enclosure:
Exhibit “A”

Exhibit “A”
Cannabis Dispensary in
Ladera Heights Community*

*Note houses across the street

From: Donna M-K Ma
To: Office of Cannabis Management
Subject: Proposed Cannabis Regulatory Program
Date: Thursday, August 6, 2026 1:56:31 PM

CAUTION: External Email. Proceed Responsibly.

To whom it may concern: This is in regard to the public hearing on August 6, 2026.

I'm a 75 years old female. I have severe pain with my colon whenever there's a bowl movement due to IBS (Irritable Bowel Syndrome. It is a common, long-term condition that affects the large intestine (colon) and stomach, causing belly pain, cramps, bloating, gas, and changing how often you poop.) I even afraid to go out after I have eaten something because I don't know when I will have to go to a restroom. Because of the unpredictable situation. I have no social life at all. I had been using "strong RX pain killer" to help the pain since the discovery many years ago. I had 3 surgeries for this issue in the past years! I kept visiting the GI, but he said from the last visit: That's nothing else he can do now if the surgery doesn't help.

From reading an article in y2024, I thought of using cannabis-infused edibles because I don't want to take too much of the "chemical." My health caused me pain every day on different areas of my body. I'm already taking a few long-term RX medicines, daily. That's a lot of chemical intake. Surprisingly, the cannabis works/helps for the pain. It also helps with my major depression/bipolar disorder. (I did make sure that I will not be overdosed.)

I want to say there are people who wish to have something for pain but with no chemicals. Cannabis items are too expensive. It's also very hard to locate them locally. Especially those I think work better for me. I was told that it is illegal in LA County. Therefore, the items I like are no longer available, not even from delivery. I really hope the RPC will consider passing Title 22 for proposed Commercial Cannabis Regulatory Program. By doing so, it definitely able to control the price, and ideally, easier to purchase them. It will also be a great help for the seniors who live on a fixed income. (Someone like me!)

Thanks for the chance to voice my option.

Donna Ma
[redacted]

From: me meme
To: Office of Cannabis Management
Subject: Osvaldo Munoz
Date: Saturday, August 8, 2026 10:34:26 AM

CAUTION: External Email. Proceed Responsibly.

Hi, I got a email wanted to see that the meeting is still scheduled at 9:00am for the 26th of this month. I been following 2018 and hope this goes through. Can you please confirm that meeting has not canceled.
[redacted] or email thanks

From: Cee Bee
To: Office of Cannabis Management
Subject: Re: Notice of Public Hearing for Proposed Title 22 Amendment of Cannabis Zoning
Date: Tuesday, August 11, 2026 6:41:07 PM

CAUTION: External Email. Proceed Responsibly.

August 11, 2026

Los Angeles County Regional Planning Commission
Hall of Records
320 W. Temple Street, Room 150
Los Angeles, CA 90012

RE: NOTICE OF PUBLIC HEARING AND CONSIDERATION OF FINAL ENVIRONMENTAL IMPACT AND PROPOSED ZONING ORDINANCE AMENDMENTS TO TITLE 22 FOR PROPOSED CANNABIS REGULATORY PROGRAM

Dear Members of the Board of the Regional Planning Commission:

As a citizen of unincorporated West Rancho Dominguez, I implore you to reconsider rezoning unincorporated areas of Los Angeles County to allow for cannabis dispensaries.

In recent years, LA Supervisor Holly Mitchell has voiced her support of cannabis dispensaries in unincorporated areas stating that they "create opportunities for Black entrepreneurship." This is despite residents' opposition. At greater issue than creating "business opportunities," what the dispensaries would do is promote drug addiction in Black and Brown communities, increase traffic and parking issues in our neighborhoods, and create opportunities for crime.

For decades now, we've all heard that marijuana is a "gateway drug." Although it is legal in a few states such as California, it is still illegal on the Federal level, and for good reason. Studies have shown that the drug is addictive and has a negative impact on a young person's developing brain. Therefore, residents such as I would like to know who it would serve to have a populous addicted to cannabis. Instead of making cannabis more available in the Black and Brown communities, we residents would prefer to see more money and resources put into extracurricular activities to better our youth rather than cripple them and hold them back.

Our local residents have also seen an increase in traffic and parking issues due to the cannabis dispensaries that are currently illegally operating in the unincorporated areas. There are two adjoining such businesses operating on Avalon Blvd. at the intersection of Redondo Beach Blvd. next door and across the street from single family homes. Cannabis customers not only create parking issues for the residents but have also caused traffic accidents such as when the West Rancho Dominguez brick sign on the median in front of the dispensaries was struck and crumbled by a vehicle, and more recently when the fence of a logistics building across the street

was plowed into.

In addition, customers constantly dart through traffic on Avalon Blvd. to make their cannabis purchases which contributes to the other traffic hazards in the area. As we're well aware, many cannabis users are also impaired drivers, and these types of situations put residents – especially children walking to and from school – in peril.

Lastly, rezoning unincorporated areas for cannabis dispensaries brings a criminal element into our neighborhoods. It is not uncommon that dispensaries are burglarized. There is nothing to stop such criminals from breaking into the homes of residents that surround the dispensaries. It is inexcusable to put residents at risk for the sake of profit.

As stated, the residents of the unincorporated areas implore you to reconsider your interest in rezoning to allow for cannabis sales. Such sales would enable addicts and encourage addictive behavior in at-risk and marginalized members of our community. Illegal dispensaries already operating in the area offer no guarantee that they will ever become licensed to operate legally. Please prioritize safety and common sense over financial gain.

Sincerely,

Clare Brooks

MAYOR:
SANDRA ARMENTA

MAYOR PRO TEM:
POLLY LOW

COUNCIL MEMBERS:
MARGARET CLARK
SEAN DANG
STEVEN LY

City of Rosemead

8838 E. VALLEY BOULEVARD
ROSEMEAD, CALIFORNIA 91770
TELEPHONE (626) 569-2100

August 12, 2026

LA County Office of Cannabis Management
320 West Temple Street, Room G-10
Los Angeles, CA 90012

Subject: City of Rosemead – Comments on PRJ2024-000811 (Cannabis Zoning Ordinance) and the Eligibility Zones for Commercial Cannabis in Unincorporated LA County Map

To Whom it May Concern:

Thank you for giving the City of Rosemead (City) the opportunity to provide comments for LA County's Cannabis Zoning Ordinance and the Eligibility Zones for Commercial Cannabis in Unincorporated LA County map. In reviewing the map, some areas that are identified for retail sale of cannabis are adjacent to sensitive uses within the City, the ranges of which are provided below:

- 650 feet, or less, of Maryvale, Kids Klub, Don Bosco Technical Institute, and Evergreen Baptist Church;
- 350 feet, or less, of churches including Neighborhood Church of Rosemead or Branches Fellowship; and
- 100 feet, or less, of Monterey Healthcare & Wellness Centre and residential areas.

In the proposed ordinance, LA County (County) only identifies buffers prohibiting retail cannabis uses within 600 feet from "youth-oriented" uses and non-medical Alcoholism or Drug Abuse Recovery or Treatment Facility licensed by the California Department of Health Care Services. The City is greatly concerned that the proposed eligible areas and buffers will not adequately account for the close proximity of cannabis retail businesses to residential uses, tutoring centers, healthcare facilities, churches or religious institutions, or other commonly understood "sensitive uses", which are also defined in Section 22.14.190[1] of the County Municipal Code.

[1] Sensitive use. A land use where individuals are most likely to reside or spend time, including dwelling units, schools and school yards - including trade schools, public and private schools, faith-based and secular schools, parks, playgrounds, daycare centers, preschools, nursing homes, hospitals, licensed care facilities, shelters, and daycares or preschools as accessory to a place of worship, that are permitted in the zones where they are located.

The placement of these cannabis related businesses near the City's boundaries has the potential to increase the incidence of crime-related secondary impacts and is contrary to City and County policies that are intended to promote and maintain the public's health, safety, and welfare. Furthermore, the proposal is inconsistent with the County's own Strategic Plan "North Stars" including North Star's I and II Goals: Healthy Individuals and Families, Support Vulnerable Populations, Public Health, and Public Safety.

Residential uses are rightly understood as sensitive uses elsewhere in Title 22, such as when regulating industrial activity, adult or alcohol-related uses, automobile service stations, or even drive-through establishments. Homes, private residences, and residential uses - including foster homes and similar types of housing - are places where children have lived in the past and may live in the future, often spending a majority of their youth there. Therefore, residential uses should either be included in the County's understanding of "youth-oriented" uses, or the buffer should be expanded to include sensitive uses like residential uses in addition to "youth-oriented" uses.

Furthermore, although young individuals are often at special risk from cannabis or other controlled substance abuse, other uses that are not listed as "youth-oriented" are impacted routinely by cannabis usage or substance abuse, such as places of worship, mental health treatment centers, special needs or tutoring centers, and shelters, among others. The County should consider including these sensitive uses in the proposed buffer, to avoid potential negative impacts to public health, safety and welfare of our youth.

In addition, expanded buffers should be required for "youth-oriented" uses that primarily include children that may be more independent and able to walk to a cannabis retail location. It would take about 2 minutes for a student from a high school, like Don Bosco Technical Institute, to walk to a retail location located 600 feet away. Increasing the buffer size to 1,000 ft., if only from high schools, would better keep children away from drugs and dangerous activity that tends to collocate with cannabis uses, and improve the quality of life for unincorporated and City residents, while still making available sufficient locations for retail sales of cannabis in the County.

Lastly, City staff shared concerns with County staff about how currently proposed "youth-oriented" uses were mapped in the Eligibility Zones for Commercial Cannabis in Unincorporated LA County map. Our staff reviewed those maps and found that some parcels "youth-oriented" uses were not mapped as such. The proposed cannabis ordinance includes no process to verify whether any "youth-oriented" or sensitive uses exist within a buffer of a proposed cannabis outside of a list maintained by the County which may or may not reflect what exists on the ground. To prevent errors and assist with streamlining application processing, a notification of surrounding property owners and tenants would help identify property that have "youth-oriented" uses, or "youth-oriented" uses that have not properly been licensed. Notification of surrounding property owners and tenants, even for a ministerial

process, would allow properties with sensitive or "youth-oriented" uses to provide relevant information to County staff before approvals are granted.

Accordingly, the City respectfully requests that Los Angeles County:

1. Re-evaluate the buffering requirements to include residential uses, places of worship, shelters, tutoring or special needs centers, medical and mental health facilities, institutions of learning, all State licensed care facilities, including but not limited to Family Child Care Homes, and all sensitive uses.
2. Expand the required prohibition buffer to at least 1,000 feet, if not from all youth-oriented and sensitive uses, then at least for high schools or similar uses where children are more mobile.
3. Revise the Commercial Cannabis Eligible Areas Map to correct any inaccuracies or depict buffers for youth-oriented uses that are not reflected in the current map.
4. Include a notification procedure for property owners and tenants within any buffer prior to approval.

The City appreciates the opportunity to provide these comments and looks forward to continued coordination with Los Angeles County as the ordinance is refined. Thank you for your consideration of the City's concerns.

Please feel free to contact me at 626-569-2143, if you have any questions regarding this matter. Rosemead City Hall is open from 7:00 a.m. to 6:00 p.m., Monday through Thursday. City Hall is closed on Fridays.

Sincerely,

Richard Marshalian

Richard Marshalian
Planning and Economic Development Manager

cc: Rosemead City Council
Richard Belmudez, City Manager
Lily Valenzuela, Director of Community Development
Rachel Richman, City Attorney