

Dear CAC Equity Subcommittee Members,

Please see the attached coalition comments, submitted on behalf of The Hood Incubator, Cannabis Equity Policy Council and Origins Council.

We look forward to participating in the meeting tomorrow. Thank you all for your work.

Best,

**Genine Coleman**  
Executive Director  
**Origins Council: Mendocino Appellations Project**  
cell 707-357-4599  
[genine.coleman@mendomap.org](mailto:genine.coleman@mendomap.org)

[www.originscouncil.org](http://www.originscouncil.org)

*"The health and vitality of the land its wildlife will be determined by the health and vitality of the communities that dwell on that land." - Wallace Stegner*



March 1st, 2023,

Dear Cannabis Advisory Committee Members and DCC staff,

The organizations represented here are pleased to share that we have convened a formal working group to collaborate on policy recommendations as relate to California cannabis social equity issues.

We would like to thank Equity Subcommittee Chair, Madison Shockley III, and the members of the CAC Equity Subcommittee for bringing these agenda items forward regarding DCC data collection and reporting on equity businesses.

Our organizations are committed to working to strengthen the integrity and efficacy of California’s cannabis social equity programs, and DCC data collection and reporting on cannabis equity businesses are key to both objectives.

There are three primary areas in which we have identified a significant need for and benefit from DCC data collection:

**1. DCC Data Collection & Reporting to Evaluate Program Outcomes**

We believe that evaluating program outcomes is foundational to ensuring the integrity of California’s cannabis social equity program. Collecting data on whether equity cannabis businesses are succeeding, or failing - as some local jurisdictions have already done - is critical to assessing the success of equity programs and determining whether improvements or adjustments should be made. Periodic assessments by the DCC would help to ensure that program outcomes are demonstrating success in meeting the needs and maximizing the opportunities associated with the communities these programs are intended to serve.

**a. Data Concerning the Overall Health of the Industry**

Effective data collection should also seek to provide insight on how equity operator outcomes correlate with outcomes for all licensed operators. The collection of this data should be organized by license type and jurisdiction. This data can help to clarify to what extent equity operator

outcomes are due to specific issues related to equity programs, as opposed to general challenges affecting the industry broadly.

#### **b. Data from Local Jurisdictions and the DCC on the Implementation of Programming**

In addition to collecting data evaluating the health of the industry, data should also be collected from local jurisdiction regarding the implementation of programming.

### **2. DCC Data Collection & Qualifying Geographic Criteria for Social Equity**

Regulatory criteria used to qualify social equity applicants should utilize geographic criteria which includes communities that have been highly impacted by historic cannabis enforcement activity. At the same time, overall criteria should be appropriately narrow to ensure that limited resources are being prioritized for those individuals most disproportionately impacted. We have been working to address the challenges associated with both access to data and qualifying geographic criteria applicable for rural historic cannabis producing regions as well as urban regions.

In rural areas specifically, enforcement activity - such as raids, detentions, and civil asset forfeiture - feature prominently in contributing to the impacts experienced in these regions. Additionally, the unique challenges in capturing accurate data through census tracts in rural communities should also be considered.

In urban areas specifically, enforcement activity such as stop and frisk encounters, traffic stops and “crime-free/drug free” rental housing eviction policies feature prominently in contributing to the impacts experienced in these regions.

Data surrounding these outlined enforcement activities in both rural and urban areas is difficult for operators to obtain, and currently plays no role in state equity criteria, which focuses on legal outcomes of enforcement (i.e. arrest and conviction). These rural and urban distinctions should inform an effort to more accurately map California’s geographic areas most impacted by historic law enforcement activities.. We will be working on collective policy recommendations regarding these criteria, and look forward to bringing those forward to the CAC in the near future.

We recommend that the DCC resource the collection of data related to historic law enforcement activity and outcomes in urban areas as well as the historic rural cannabis producing regions of California.

### **3. DCC Statewide Cannabis Social Equity Assessment.**

As a part of advancing a legalized cannabis industry that fosters a safe, sustainable, and equitable cannabis market, we feel that it is important that the DCC pursues research that accurately captures the full depth and breadth of historic cannabis enforcement activity, and the impacts of the War on Drugs to California’s communities. Many local jurisdictions have produced equity assessments which seek to clearly establish the impacts of cannabis prohibition within their jurisdiction, and correlate these impacts with ongoing needs in these communities. A similar

assessment, however, has not been carried out on a statewide level to inform the nature of a statewide equity program. It is only through understanding our history that we may build for an equitable, sustainable and just regulated California cannabis industry.

Thank you for your consideration.

Sincerely,

*/s/ Eliana Green*

Eliana Green Esq.

Director of Community Engagement, The Hood Incubator



Khalil J. Ferguson

Deputy Directory

Cannabis Equity Policy Council



Genine Coleman

Executive Director, Origins Council