

December 14, 2017

Elizabeth Mowry Hull
Chair, City of Stockton Planning Commission
Council Chamber, City Hall
425 N El Dorado Street
Stockton, CA 95204

**Re: Agenda Item # 5.3 Request for a Use Permit and Design Review
Approval to Establish a 35,640 square foot Medical Cannabis
Cultivation Facility in an Industrial General (IG) Zone Located at 7979
South Airport Way– Oppose**

Dear Commissioner Chair Hull:

The San Joaquin County Mosquito and Vector Control District (District) opposes the approval for a conditional use permit to operate a medical cannabis cultivation facility at 7979 S. Airport Way. The District headquarters is located directly north of this site at 7759 S Airport Way. The District's services provide protection to the residents and visitors in San Joaquin County from mosquito-borne diseases such as Western Equine encephalitis, St. Louis encephalitis, West Nile virus, and is currently conducting surveillance work to detect the arrival of invasive aedes mosquitoes capable of transmitting Zika virus.

Chartered in 1945, the District was formed due to the growing concern of encephalitis. In 1955, the District built its Stockton headquarters at its present location on Airport Way. Over the years, the District has successfully protected the public of San Joaquin County from the threat of mosquito-borne disease, economic loss to animal husbandry operations that include horse ranches, chicken ranches and dairy cows from aggressive mosquito biting activities, and protecting man's best friend from the transmission of dog-heartworm.

To control these mosquitoes one must understand the timing of control operations to achieve the most effective results. The mosquito control technicians must be available to work hours when mosquitoes are most active. Primarily, the timing for adult mosquito control (flying stage of the mosquito) is completed during dusk and evening hours and early morning until dawn.

Thirty-five employees make up this work force responsible to conduct the comprehensive work that is necessary to achieve our goal of controlling these pests of public health concern. The field technicians start their work day at 7:00 am and inspect and treat mosquito breeding areas until the end of the work day at 3:30 pm. Monday thru Friday. During the height of the season (May – October) many times the technicians are required to return to the work site in the evening to conduct our adult mosquito control operations, especially in response to virus activity, specifically West Nile virus. They arrive to work at 6-7 pm and return from their spraying operations around mid-night. Conversely, there are times they are required to arrive at 3:30 a.m. to begin the work day when spraying in congested urban areas. Often times this also takes place on weekends.

The concern of the District and its Board of Trustees is the safety of our employees in the work place. Obviously, there are dangers inherent with our line of work; however, arriving to and leaving from the work place should not be one of them.

The proposed use to raise marijuana plants right next door is not in the best interest for our district and our employees. The amount of security being proposed for the 7979 S Airport location proves there is an obvious concern for an element of crime to transpire. You do not see this type of security implemented at any of the other businesses neighboring our property. The Board is not convinced that the necessary survey work to determine the types of current businesses and their associated operation procedures was completed within the radius of this proposed business site. The city of Stockton Planning Department should not recommend approval solely on identified zoning designations.

The proposed security is to protect the theft of plants on the proposed site, not to ensure the safety of the employees and associated operations of the neighbors, specifically north of the proposed site. There is only a cyclone fence separating this property and the District's property. The criminal element exists, we have seen and read the brazen efforts from those who have attempted to burglarize or rob these types of operations.

Is it fair to the County tax payers for the District to use the tax base collected to provide mosquito control on additional security measures to protect its employees? Should the employees have to be concerned about leaving their personal vehicles in the District's parking lot at night or early morning hours because of concern individuals may be lurking on our property to gain access next door? Does the District need to enhance security to the entrance of our front office? Is it fair that our employees may be subjected to foul odors from this operation that could be objectionable to them?

Who does that background checks regarding the hiring of employees for this facility, and how do we know those employees don't have ulterior motives? Is the security guard going to provide site security at our facility at not cost to the District? The conditional use permit should be conditioned to provide maximum security measures to protect the neighbors' facilities as well as the property site. If these security conditions are not satisfied on an ongoing basis, the Use Permit is revoked by the City and the facility would have to shut down.

It is my job as the District Manager to ensure the safety and well-being of my employees. They complete a job to protect the public's health from mosquito-borne diseases. As they are doing their job to keep the residents and visitors of San Joaquin County safe from these public health threats, shouldn't they have the right and expectation to feel safe and free from the threat of becoming a victim of potential crime?

Sincerely,

Eddie Lucchesi

Manager

c/o

Board of Trustees of the San Joaquin County Mosquito and Vector Control District