

# LOS ANGELES COUNTY ADVISORY WORKING GROUP ON CANNABIS REGULATION GUIDE TO MAKING RECOMMENDATIONS

## Role of the Advisory Working Group

The Los Angeles County (County) Office of Cannabis Management (OCM) convened the Advisory Working Group to provide a framework, in the form of recommendations, which County regulators can use to prepare rules for commercial and personal-use cannabis. While the County is not obligated to adhere to recommendations offered, it is the County's expectation that the group's recommendations will provide a foundation for the County's cannabis regulatory program.

## Guiding Principles for Making Recommendations

*(Refer to: Week One – Kickoff and Orientation Preparation Packet, page 27)*

All Advisory Working Group recommendations must reflect the following principles:

1. Recommendations must be consistent with the policies of the Board of Supervisors, as identified in its cannabis motions dated February 7, 2017.
2. Recommendations must be consistent with state law and regulations.
3. Compliance with regulations must be achievable, repeatable, and defensible.
4. The County must be able to enforce compliance with regulations.
5. Monitoring for compliance with regulations must be achievable, repeatable, and not overly burdensome or intrusive.

## Additional Considerations for Drafting Recommendations

Advisory Working Group members should keep the following considerations in mind when drafting recommendations:

1. **Clarity.** Recommendations should be self-contained and easily understood, without requiring readers to reference other sources for them to make sense. Recommendations that include multiple clauses or subparts may need to be divided into multiple recommendations.
2. **Specifics.** Recommendations should be specific enough that the scope and desired outcomes of the recommendation are easily understood.
3. **Flexible.** Because a regulatory program for cannabis will contain many moving parts and require considerable resources, recommendations should allow the County some flexibility as to how best to implement the recommendations, and focus on articulating policy objectives (“ends” rather than “means”).

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- 4. Connected to objectives.** Recommendations should be linked to at least one of the 14 objectives established by the Advisory Working Group.

## Using the Recommendation Template

Advisory Working Group members should use the preparation packet, discussions and presentations during group meetings, and their personal expertise and experience to inform draft recommendations.

We are providing a template to standardize the format and help streamline the discussion of recommendations during the group's meetings. Please complete a **separate recommendation template for each recommendation**, taking care to fill out all sections of the template.

We are also attaching an example of what a completed template should look like, for guidance. Note that the recommendations included in the sample template do not necessarily reflect the views of the County or Advisory Working Group.

## Process for Making Recommendations

After each meeting, Advisory Working Group members should individually prepare recommendations regarding the topic areas discussed at the meeting. Members are free to prepare as many recommendations as they want, but should ensure the recommendations are **relevant** to the topic area discussed at a meeting.

**MEMBERS MUST EMAIL THEIR RECOMMENDATIONS BY NO LATER THAN THE MONDAY NIGHT FOLLOWING EACH MEETING.** For example, for a meeting that takes place on Thursday July 20<sup>th</sup>, recommendations are due the night of Monday, July 24<sup>th</sup>. This will give staff time to compile the recommendations for presentation and discussion at the next scheduled group meeting.

## Avoiding Duplication

The preparation packet for each meeting will provide an overview of existing laws for each topic. As much as possible, given Advisory Working Group members' range of knowledge with existing cannabis regulations, draft recommendations should avoid recommendations that are duplicative of existing state or County laws.