



February 22, 2021

Cannabis Compliance Board  
555 E. Washington Avenue, Suite 4200  
Las Vegas, NV 89101

Subject: Comments in Support of Petitions brought by Crooked Wine d/b/a Blackbird Logistics.

Dear Members of the Cannabis Compliance Board and Director Klimas,

The Nevada Dispensary Association (NDA) represents the majority of dispensary owners in Nevada. On behalf of the members of the NDA, thank you for considering these written comments in support of two petitions brought by Crooked Wine d/b/a Blackbird Logistics on the February 23, 2021 agenda.

The first petition, item IX.A. on the agenda, seeks to extend the Board's December 2020 decision to waive the "two driver rule" under NCCR 13.025(5). The second petition, item IX.B. on the agenda, seeks to revise NCCR 13.020 to include specific provisions for cross-docking distribution practices and temporary storage.

With respect to the first petition, the NDA supports the Board extending the waiver of the "two driver rule" under NCCR 13.025(5) for the duration of the pandemic to allow for safe social distancing between distribution drivers. To date, cannabis workers have not been vaccinated and it remains unclear when that will occur; therefore, all possible mitigation measures must be taken to keep employees safe. Further, the NDA would support repealing NCCR 13.025(5) altogether if it is determined that waiving the requirement of two drivers has not resulted in any safety or security issues.

With respect to the second petition, the NDA supports revising NCCR 13.020 to include specific provisions for cross-docking distribution practices and temporary storage. Blackbird's proposal would allow for significant improvements to efficiency in distribution across the state. Additionally, Blackbird notes in its petition that the current limit of 48 hours for temporary storage does not allow for storage over the weekend. The NDA supports extending temporary storage to 72 or even 96 hours.

Thank you for considering these written comments in support of the petitions.

Respectfully,

A handwritten signature in black ink that reads "L. Martin". The signature is stylized and cursive.

Layke Martin, Esq.  
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