



PEREGRINE AUDUBON SOCIETY

PO Box 311

Ukiah, CA 95482

July 19, 2021

Board of Supervisors, County of Mendocino
501 Low Gap Road, Room 1010
Ukiah, CA 95482

RE: [Commercial Cannabis Activity Land Use Ordinance](#)

Dear Members of the Board and Chair Gjerde,

As a local Chapter of the National Audubon Society, our mission is to promote the conservation of birds, wildlife, and their natural habitats. The preservation of intact oak woodland ecosystems is vital to that effort. We are concerned with the rushed and piecemeal way that the new cannabis ordinance is being adopted in an effort to avoid an EIR. We strongly endorse the following fundamental policies proposed to you by the Sanhedrin Chapter of the California Native Plant Society and encourage you to work together with these in mind.

- **Enforcement mechanisms need to be clear and scaled up significantly.** The lack of enforcement by the county to date has led to the proliferation of cultivation sites in highly inappropriate places with catastrophic cumulative effects, and any ordinance without enforcement will be woefully ineffective. Enforcement should not be complaint driven or based on volunteer efforts.
- **The county needs adequate staffing levels and skill sets** in cannabis administration and enforcement in order for any ordinance to succeed.
- **All rangelands should be excluded from cultivation.** Rangelands incorporate oak woodlands, as well as sensitive natural habitats, streams that harbor the remaining populations of over-summering steelhead and Coho juveniles, and more. Rangeland areas are also dry and particularly susceptible to wildfire, and increasing industrial activity in these areas will lead to more wildfires. The new ordinance can accommodate appropriate rangeland cultivation through the opportunity to rezone.
- **Mendocino County must develop short and long term water resiliency strategies prior to any expansion of cultivation.** Water resources are extremely limited, and water conditions in Mendocino County as a whole are the worst they have been since 1977. Watershed impacts must be addressed before cultivation is permitted.
- **The 10% expansion rule is not acceptable.** This proposed level of expansion could lead to tens of thousands of additional acres of cannabis cultivation which would in turn have massive deleterious environmental impacts. Cultivation areas should be limited as appropriate to each location after completion of a county wide Environmental Impact Report (EIR) and site specific [CEQA](#) analyses.
- **Cumulative impacts must be addressed on a landscape level.** Individual cultivation sites may have small impacts, but cumulatively across the landscape we have seen loss of year round water supplies for fish and other wildlife, forest and oak woodland conversion, radically increased sediment in our streams from rural roads, chemical pollutants in our waterways, increased carbon emissions, and more.
- Despite hundreds of letters submitted to the BOS, the above issues were not addressed in the most recent ordinance. In order to ameliorate the concerns of many of your constituents, we request that the county **conduct an EIR regardless of which ordinance is in place.** The EIR should address all cumulative impacts of cultivation, regardless of size, and address remediation measures and policy to limit and mitigate the effects.

Thank you for continuing to work toward responsible cannabis regulation and enforcement policies that insure protection of the precious natural resources of Mendocino County.

Sincerely yours,

Peregrine Audubon Society

<http://www.peregrineaudubon.org/officers.html>