



June 1st 2021

Re: BOS Meeting 6-2-2021 Agenda Item 3a

Dear Honorable Board of Supervisors,

The Covelo Cannabis Advocacy Group has reviewed the Planning Commission recommendations for the Chapter 22.18 Cannabis Land Use Ordinance.

We have outlined our **top priority** recommendations from the staff memo as follows:

1. **Establish priority processing of applications from Phase 1 applicants that are complete.**
2. **Recommend the establishment of a mechanism allowing Phase 1 applicants applying for permits under Chapter 22.18 to continue cultivating during the application process of Chapter 22.18.**
3. **Do not allow 10% expansion in Mendocino County. Allow up to 22,000 sq ft of cultivation for Phase 1 operators wishing to expand with the additional allowance of up to 1 acre on AG zoned parcels with a minimum 20 acre parcel size.**
4. **Allow Phase 1 operators transitioning to Chapter 22.18 to continue to utilize trucked water from legal water tenders until 2023.**
5. **Hydrological studies should be required for sites larger than 10,000 sq ft and not based on gallons used per day.** A site that has not been cultivated at the new expanded size will not necessarily know how much water will be used until the site has been in operation.
6. **Require a Minor Use permit for Nursery licenses.**

7. **Cap Indoor and Mixed Light operations to 10,000 sq ft or less to encourage sustainable cultivation practices.**
  
8. **Allow RL zoning to cultivate Specialty Cottage or Specialty with a minimum five (5) acre parcel size or less and remove asterisk \*1 from the Appendix A zoning chart that states: “Parcels in the RL zoning district must have a minimum parcel size of ten (10) acres”**

Thank you for the opportunity to provide comment in regards to the Chapter 22.18 Land Use Cannabis Ordinance. We feel it's imperative that the Board consider these recommendations so that the County can create a viable pathway for cannabis cultivators either transitioning from Phase 1, for new cultivators and for those wishing to expand their operations.

We stand strongly in opposition to allowing 10% expansion on RL or AG zoned parcels and we do not align with the Planning Commission recommendation to cap expansion to 2 acres. We feel that the CCAG recommendation for expansion strikes the right balance and provides plenty of equitable opportunities for cannabis operators to have a larger business and still thrive within the marketplace. Thank you for the consideration of our recommendations.

Respectfully,



Monique Ramirez  
For the Covelo Cannabis Advocacy Group