

Honorable Supervisors and Planning Commission,

My husband and I operate 2 cannabis farms in the Laytonville area branded as Elkhorn Ranch. Our outdoor gardens are a combined total of 20,000 square feet of cannabis on two separate 10,000 sf farms. We have been part of the county's cannabis program since inception, and before that we were registered in the Sheriff's 9.31 program.

Our home and one farm is located on Range Land zoning and we request that the board consider making changes to the zoning table for the Phase 3 cannabis ordinance. This excessiveness of a Major Use Permit for a 10,000 sf farm is not only overbearing it also puts an unrealistic timeline on a phase 1 applicants who must continue cultivating in order for a business to succeed. The time frame to receive a Major Use Permit would necessitate a mere 1/4 acre farm to cease production, which is untenable for those of us struggling through this process from the beginning. A Minor Use permit, such as is suggested for all sizes of UR zoning , would be more appropriate for all RL 10,000 sf or less. In most cases these farms have been in existence for years, even decades and would not constitute expansion.

Our county, already facing unprecedented problems with the cannabis program, stands to lose tax revenue in the MILLIONS as well as jobs if our farmer's are unable to obtain local and state licensure. Aligning with the intent of Range Land use for agriculture is in our best interest as a county. Protecting the resource land is also important but outdoor operations of 10,000 sf or less should by definition qualify for AP or at a maximum a Minor Use permit. Outdoor cannabis cultivation is heritage agriculture no more or less important than running cattle or cultivating grapes, all of which are allowed on RL without the requirement of zone clearance.

If we have to go through a Major Use Permit to apply for Phase 3, it is unrealistic for us to be able to continue to operate due to the extra expense and extraordinarily tight timelines required to keep our CDFA issued state license active. With RL making up 1/3 of current cannabis permits and being the largest group out of all zoning types; the county should be worried about the financial implications. Understaffed, underfunded and overworked employees will all be strained by the requirement of Major UP being required and create a bottle-neck in the Phase 3 permit process.

Additionally, although we have no intention of expanding, re-applying for a Phase 3 permit for farms is appealing as it would help resolve the CEQA issue that has plagued Phase 1 applicants and is the single largest hurdle cannabis farmers in Mendocino are now facing. Currently our RL property is unable to utilize this option. We encourage you to allow phase 1 operators on RL and TPZ who DO NOT WISH TO EXPAND to use the phase 3 option for CEQA clearance.

Very few farms on Range Land will be able to continue to operate if the current zoning table is not modified. We request the Board of Supervisors contemplate changing the table to allow AP or Minor use for RL cultivation permits that are 10,000 square feet or less.

We request the ability for FL and TPZ zones phase 1 applicants to use phase 3 pathways forward if they do not want to expand.

We request the board illuminate a path that allows phase 1 applicants in good standing (have embossed receipt or permit from county AND valid state license) to continue to cultivate while they reapply for phase 3 clearance.

Thank you for your service and consideration,

Sincerely,

Amy & Neil
Elkhorn Ranch
Laytonville, CA