



August 26, 2019

To: Mendocino County Board of Supervisors
860 North Bush Street
Ukiah, CA 95482

RE: Cannabis Cultivation Regulation

Dear Members of the Mendocino County Board of Supervisors;

The California Native Plant Society (CNPS) is a statewide organization dedicated to the preservation of native flora and native plant habitats. Mendocino County has two chapters, the inland Sanhedrin Chapter, and the coastal Dorothy King Young Chapter. Both the Sanhedrin and Dorothy King Young Chapters of the CNPS would like to comment on the proposed amendment to Section 20.242.040 of the Mendocino County Cannabis Cultivation Ordinance, which would allow for the expansion of cannabis cultivation within Rangeland zoning districts.

Changing existing rules to expand into Rangeland zoning districts is inconsistent with the CEQA Mitigated Negative Declaration analysis and conclusion adopted by the Mendocino County Board of Supervisors, thus any cannabis cultivation project tiered off of the Mendocino County Medicinal Cannabis Cultivation Ordinance on parcels zoned Rangeland would be invalid.

In the strongest terms possible, we urge the Board of Supervisors to not open the county up for litigation, and not allow for the expansion of cannabis cultivation in inappropriate areas. Rangelands often contain habitat for rare, threatened, and endangered species, sensitive habitats (including serpentine), and provide contiguous wildlife corridors. Additionally, without a rigorous grading ordinance, expansion in these areas will lead to increased erosion and stream degradation.

We have already provided comments to this effect on September 28, 2016; February 6, 2017; March 1, 2017; and March 12, 2018. In addition, the comments provided by the Mendocino County Resource Conservation District (MCRCD) from September 16, 2016 specify that the expansion of rangeland cultivation would require an EIR.

The comments previously provided by the local chapters of the California Native Plant Society, as well as the comments of the MCRCD, are attached for the record.

Sincerely,

Jennifer Riddell, Co-President, Sanhedrin CNPS
Andrea Davis, Co-President, Sanhedrin CNPS
Cathy Monroe, Vice-President, Sanhedrin CNPS
Emily Allen, Conservation Committee Chair, Sanhedrin CNPS
Renee Pasquinelli, Conservation Committee, Dorothy King Young Chapter CNPS