

Dennis Slota

8/4/20

To: Mendocino County Board of Supervisors

Subject: BOS 8-4-20 Meeting, Agenda 5b, regarding abandoning the County Cannabis Ordinance

Dear Supervisors,

I have a B.S. in Biology, a B.S. in Geology and a M.S. in Hydrogeology. I have reviewed all of the documents and attachments related to this Agenda item. The Planning Department proposal to abandon the Cannabis Ordinance, without significant public and Resource Agency input, is not acceptable, at this time. The attempt to have PBS staff perform the Sensitive Species Review (SSR) for the California Department of Fish and Wildlife (CDFW) is very problematic. Planning Department staff are not trained wildlife, botanical, or ecological scientists. This is outside of their training and expertise. The suggestion that staff will be trained by CDFW is illusionary, unless we hear directly from CDFW and we see the curriculum, instructors involved and extent of training. This supposed training does not account for staff turnover at all levels of PBS and there was no requirement that trained staff perform the SSR.

The fact that PBS is surprised and upset that the California Department of Food and Agriculture (CDFA) requires a "site specific and unique project description" illustrates that they are unqualified to perform higher scientific analysis. I reviewed the CDFA project description templates for rural and urban sites attached to this Agenda. I found them completely logical, sensible and not at all daunting or challenging.

In reviewing all documents attached to this BOS Agenda, nowhere was a requirement that a field inspection be performed by the person conducting the Sensitive Species Review (SSR). A legitimate analysis cannot be performed without an on-site visit, except in rare instances. Having no field site review requirement, further highlights that PBS is unqualified to perform the SSA. It appears that the goal of PBS is to have un-trained staff sit in a windowless office to "rubber stamp" checkbox SSR templates, to expedite handing out permits, to clear a backlog.

The egregious lack of public input in this major proposal, which overturns the will of people in the defeat of Measure AF, will likely result in legal action against the County, should the County vote to act on the PBS recommendation at this meeting. Thus, acting on this proposal will be counter-productive. Please uphold the will of the people to protect Rangeland.

Rather than the former bi-weekly reports on number of permits issued, the public is interested in regular reports on the status of Cannabis complaint resolutions and enforcement actions by the Sheriff and PBS.

Speaking on behalf of friends and neighbors, we understand that the Ordinance may need modification as we go along and want to be involved. We propose that Mendocino County align with Humboldt County to ban trucked in water and conduct aerial monitoring surveillance as part of our Ordinance.

Sincerely,

Dennis Slota