



August 3, 2020

John Haschak, Chair
Board of Supervisors, Mendocino County
501 Low Gap Road
Ukiah, CA 05482

Transmitted via email: haschakj@mendocinocounty.org and bos@mendocinocounty.org

RE: Oak Protections and Cannabis Cultivation Ordinance

To the Honorable Chair John Haschak and fellow members of the Mendocino Board of Supervisors:

The California Oaks program of California Wildlife Foundation (CWF/CO) works to conserve oak ecosystems. California Oaks Coalition is an initiative of California Oaks that brings together national, state, regional, and local organizations to conserve and perpetuate the state's primary old growth resource. California Native Plant Society, a member of the California Oaks Coalition, asked us to write regarding their concerns that oak protections will be eroded with the replacement of the cannabis ordinance by a land use ordinance. Members of the California Oaks Coalition are united by the vital role of oaks in sequestering carbon, maintaining healthy watersheds, providing habitat, and sustaining cultural values.

In the letter sent to the Board of Supervisors on July 21, 2020 by California Native Plant Society they noted a number important provisions of the Cannabis Cultivation Ordinance, which they would like to see retained. These provisions, as articulated in the CNPS letter, include:

1. The prohibition of new permits to cultivate cannabis in the rangeland zoning district. This is a straightforward provision and therefore enforceable. It removes an incentive to promote commercial and residential development and landscape fragmentation in the county's remote rural areas. These areas generally have sloping to very steep terrain, scarce water resources, erodible soils, and high vulnerability to fire.

Rangelands provide critical contiguous habitat for wildlife, and encroachment by cultivation operations fragments this habitat in ways that will lead to an increased strain on our wildlife populations. Our native carnivore and prey animal populations are high because of our reasonably intact rangeland, oak woodland and chaparral habitats.

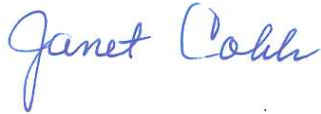
Rangeland in Mendocino County contains rare plants, serpentine soils, and vital habitat for over-summering steelhead juveniles. The increased stress on riparian areas in rangeland has led to loss of water in streams, and a loss of cool water for our listed fish species.

2. The prohibition of the removal of any tree for the purpose of cannabis cultivation. Our oak woodlands are a biological treasure. Oaks are slow growing, often taking over 100 years to reach six inches in diameter, and some of our oaks are endemic to California. Oak regeneration in California has been challenged by changing land use practices, leading to an aging population of mature oaks. Overall, we risk a decline in our oak population if we don't put a moratorium on cutting oaks in wildlands.

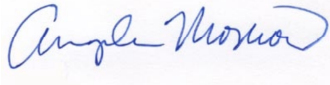
We've witnessed a significant loss of oaks in new cultivation sites, where growers will cut down trees or damage them in order to make space for a high dollar crop. The Ordinance's prohibition on tree removal is key to being able, with enforcement, to prevent this practice.

CWF/CO agrees that rangeland and tree removal protections are important to retain. Please ensure oak protections are an integral part of the permitting and enforcement process for cannabis production.

Sincerely,



Janet Cobb
Executive Officer



Angela Moskowitz
Manager, California Oaks Coalition

cc: Kate Marianchild, Author, Activist, and Naturalist
Jennifer Riddell, Co-President, Sanhedrin Chapter CNPS Board
Renee Pasquinelli, Conservation Chair, Dorothy King Chapter, CNPS