

Dear Supervisor Williams,

Thank you for your short note in response to my email of last week. You state (in full) "You have faulty information. These claims are just not true," and refer me to the County planning staff memo of Mar. 16. I do not find that the memo (or proposed ordinance) negates or alleviates my concerns.

First, I do acknowledge that at least two of the specific environmental safeguards I referred to (items #5 and 6) apparently have now been incorporated into the revised ordinance, so in that respect I was inaccurate.

That still leaves the large elephant in the room: allowing up to 10% of parcels in the ag, rangeland, and upland residential zones to be developed for highly intensive use for commercial cannabis. The planning staff memo states (in brief) that "The key to this discussion is that each cultivation site would be subject to a discretionary permit..." with findings and mitigations on a site-specific, case by case review, including a checklist of environmental factors.

Having been a land use, environmental & economic planner for several decades, I do not find that this discretionary process is a satisfactory solution. While it maximizes "flexibility", It puts an inefficient and undue burden on staff and Planning Commission to analyze each proposed permit in isolation. While one might find a 40-acre parcel here or a 100-acre parcel there to be suitable for a cannabis operation, what is the impact on thousands of parcels and hundreds of thousands of acres county-wide? The entire point of land use planning and zoning is to look at the bigger picture of what uses are beneficial to the County and its residents and to define those into the zoning codes, so both the public and private property owners know what is allowed or not.

To be clear, deciding each application case-by-case (even if done with best intentions and diligence) does not address cumulative impacts. To make such a massive change in policy without first doing an overall environmental impact report is unwise and, I believe, unconscionable.

I again urge you and your colleagues to reject this proposal or, at the very least, to slow down this rushed process and do a comprehensive environmental analysis first.

Sincerely,

Madge Strong