

pbscommissions - Comment

From: Zack Cinek <cinek.zack@gmail.com>
To: <pbscommissions@mendocinocounty.org>, <pbs@mendocinocounty.org>
Date: 3/18/2021 7:12 PM
Subject: Comment

RECEIVED
MAR 19 2021
Planning & Building Services

Dear Planning Commissioners and all Citizens of Mendocino County:

I am writing to address specifically the issue of rangeland. I first ask anyone to take a look at the county's zoning map. This so-called "Rangeland" is everywhere in Mendocino County and it includes forested areas. Maybe your neighbors are on Rangeland. Now picture 1 acre of cannabis farming for every 10 acres of Rangeland on parcels 10 acres or more. In my neighborhood, this is a water use disaster waiting to happen! Deep wells already pull water from mountain ridges. We are in a serious drought. Downhill from these cleared mountain tops are entire ecosystems of diverse wildlife and natural springs. Streams support fish and provide the only drinking water and moisture for many precious species--you can see the trails of all around in the summer made by animals in search of water. The existing outlaw growing operations on rangeland, for example, are miniscule compared to even one full acre of cannabis farm.

If this is not alarming, then I plead for you to get outdoors and to see for yourself. It is bizarre to lump an expansion of rangeland cultivation together with Ag, for example. In the big picture, I think the state needs to step up with a science-based Cannabis Practice Act (like the Forest Practice Act). The response from this commission needs to be an affirmative "no" on the current proposal.

Regards,

Zack Cinek
Willits, CA
[707.613.0369](tel:707.613.0369)

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pbscommissions - CCAG Memo Support

From: Jenn Procacci <jenn@wildlandcannabis.com>
To: <pbscommissions@mendocinocounty.org>
Date: 3/18/2021 7:51 PM
Subject: CCAG Memo Support

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MAR 19 2021

Planning & Building Services

Dear Planning Commission Board,
As a resident of the 3rd district, decade long resident of Mendocino County, and permitted cannabis cultivator, I support the Covelo Cannabis Advocacy Group (CCAG) memo and want to voice my personal opposition to 10% acreage expansion. Please cap outdoor cultivation to 22,000 sq ft, and mixed light/indoor to 10,000 sq ft.

Thank you for your time concerning this important agenda item.

Respectfully,
Jennifer Procacci.

277

pbscommissions - Subject: Agenda Item 6b

From: Joshua Artman <josh@bluenosebotanicals.com>
To: <pbscommissions@mendocinocounty.org>
Date: 3/18/2021 8:53 PM
Subject: Subject: Agenda Item 6b

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MAR 19 2021

Planning & Building Services

Dear Planning Commission Board,

As a resident of the 3rd district, I support the Covelo Cannabis Advocacy Group (CCAG) memo and want to voice my personal opposition to 10% acreage expansion. Please cap outdoor cultivation to 22,000 sq ft, and mixed light/indoor to 10,000 sq ft.

Thank you for your time concerning this important agenda item.

Respectfully,
Joshua Artman

Joshua Artman CEO
Bluenose Botanicals
[412-841-6622](tel:4158416622)
bluenosebotanicals.com

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MAR 19 2021
Building Services

From: Sattie Clark <sattieclark@gmail.com>
To: <pbs@mendocinocounty.org>
CC: <pbscommissions@mendocinocounty.org>, <bos@mendocinocounty.org>
Date: 3/18/2021 9:18 PM
Subject: OA_2021-0002 (Cannabis Cultivation) (Phase 3)
Attachments: Letter to PlanComm 3-17-21 final.pdf; Part.002

I am writing again because our letter of 3/16/21 has not been posted with the other letters for the Planning Commission March 19 meeting, item OA_2021-0002 (Cannabis Cultivation) (Phase 3). Please advise.

Sattie Clark
Redwood Valley

March 16, 2021

Mendocino Planning Commission
860 Bush Street
Ukiah, CA 95482

Dear Commissioners,

We are members of the Redwood Valley MAC, speaking here as private citizens. Our views are not necessarily those of any other body including the Board of Supervisors, nor do we speak here for anyone else.

We strongly oppose the expansion of cannabis cultivation up to 10% of acreage in AG, UR, and RL zoning districts, as specified in the Commercial Cannabis Activity Land Use Ordinance. We want to underline our shared position with the Laytonville MAC and the Round Valley MAC in their opposition to this impending decision/vote. Allowing 10% of total acreage for commercial cannabis farming exacerbates existing, non-mitigated stressors that will quicken environmental collapse in our county.

Redwood Valley residents care deeply about the quality of their natural environment and have long worked to be good stewards of its resources. In our Community Action Plan of 2020, residents diligently and specifically expressed concern about the negative impacts of large scale indoor and outdoor cannabis cultivation on residents—especially lights, fences, hoop houses, smells, violent crime, traffic, property values and the environment. We are already struggling with these and while Phase III could eventually reduce crime, we have reason to believe the other negative impacts will get worse.

Most importantly, Redwood Valley's current water crisis has made almost certain that agricultural water provided by Redwood Valley County Water District will soon be shut off completely. Delivery of domestic water will likely depend on reallocation of water from other districts or agencies. We agree with Supervisor Glenn McGourty that we must protect every drop of water in the Upper Russian River Basin. We owe it to our county's existing farms and families to protect them first before inviting in large-scale cultivation off a crop known for its excessive water demands.

We lack confidence that Mendocino County has the budget, staffing or track record to responsibly allow new cannabis operations while also protecting residents and existing businesses. Already Redwood Valley is experiencing rapid proliferation of hoop houses without any signs of oversight or enforcement. We have noted a lack of transparency and public process in the County's fast-tracked development of Phase III of the Cannabis Ordinance. Without inviting and heeding the voices of citizens and giving ample time and forums for public discussion, the democratic process has failed. Though the majority of Californians voted to legalize cannabis, we have heard from so many in our county that this proposal is not what they voted for. They wanted legalization of small, sustainable farms.

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We therefore oppose the development of large-scale cannabis cultivation in our district. We respectfully request that you reject the Board of Supervisor's proposal for Phase III expansion of cannabis cultivation in Mendocino County. While this type of expansion might be appropriate in other counties with more robust resources, it is not appropriate here.

Thank you very much for your consideration and your time and attention to this urgent issue.

Very Sincerely,

Sattie Clark, Patricia Yarbrough, Jini Reynolds, Marybeth Kelly, Chris Boyd, Katrina Frey

March 17, 2021

Mendocino Planning Commission
860 Bush Street
Ukiah, CA 95482

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MAR 19 2021
Planning & Building Services

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1000

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Thank you very much for your consideration and your time and attention to this urgent issue.

Very Sincerely,

Sattie Clark, Patricia Yarbrough, Jini Reynolds, Marybeth Kelly, Chris Boyd, Katrina Frey
Residents of Redwood Valley

pbscommissions - DO NOT EXPAND CANNABIS OPERATIONS

From: Suzanne Pletcher <pletcherconsult@gmail.com>
To: <pbscommissions@mendocinocounty.org>
Date: 3/18/2021 9:57 PM
Subject: DO NOT EXPAND CANNABIS OPERATIONS

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 MAR 19 2021

Planning & Building Services

TO: PLANNING COMMISSIONERS AND BOARD OF SUPERVISORS

In my opinion, it is unconscionable to even consider expanding the amount of property that can be devoted to cannabis grow sites until the alleged 90% of illegal grows that are causing so much public angst are dealt with.

Rural landowners—particularly in the inland areas of Mendocino County—are swapping horror stories about neighboring properties that have been purchased by people from San Francisco, Sonoma County and throughout the country for growing cannabis. These owners hire others to grow the crop for them. From what I have experienced in my own rural subdivision, the results are disastrous. Brush and trees are cut down, hillsides graded, trash and decaying plastic from hoop houses is spread around properties...it's disgusting. These people cheat their neighbors on road association dues, not paying their fair share even though they contribute a disproportionate share of traffic. Their dogs bark, their lights shine 24/7, generators run 24/7... the list of grievances is lengthy. Even some permitted sites are not adhering to their permits.

And now the county leadership has hired a cannabis program manager whose qualifications are as an advocate for the cannabis industry??

I would love to take you for a tour of my own rural neighborhood, where five of the six properties most recently sold are now unlawful cannabis grows that have undermined our environment and our community. **It's not right** for our county to be so lawless and our leaders so deaf to the concerns of non-pot-growing citizens.

Please hear this: We want to live with fewer of these horrible neighbors, not more! The impact of irresponsible cannabis grows is costing us all—in quality of life, permit fees and tax revenues, pilfered water from streams, noise, traffic, drug culture etc. **It's appalling what our county leadership is allowing to happen.**

You must **NOT ALLOW EXPANSION** of cannabis grows until you have addressed the 90% of illegal grows that are occurring in the county. These may be the same small growers who claim they are responsible, but if you would do more checking, you are likely to find the opposite is true.

Sincerely, —Suzanne

--
 Suzanne Pletcher
pletcherconsult@gmail.com
 (707) 489-1325

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pbscommissions - Agenda Item 6b

From: Michelle Penaloza <michellepenaloza@gmail.com>
To: <pbscommissions@mendocinocounty.org>
Date: 3/18/2021 10:22 PM
Subject: Agenda Item 6b

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 MAR 19 2021

Planning & Building Services

Dear Planning Commission Board,

I write to you to express my opposition to 10% acreage expansion.

The County staff are already stretched at full capacity dealing with the County's current cannabis program; the BOS voting to expand the program to this magnitude is untenable and unwise. The County must fully address the issues with, and complete the work of, Phase 1 before voting on any more expansion. The County needs to slow down and learn from the past mistakes of pushing through problematic and underthought cannabis ordinances. Mendocino County must show the State that it can hire a decent manager and run a functional program before there is any more expansion. Additionally, some supervisors keep blaming the failures of Phase 1 on cultivators, when the onus rests on the County (which, still has yet to communicate with any permittees, in good standing or not, regarding any needed changes for CEQA; which, asks applicants to submit sensitive documents into trash cans). These same supervisors, alongside large business interests, continue to conflate the failure of this process with the issue of expansion, as though the current dysfunctional process will be rescued from failure by increasing the amount of canopy and the amount of work of already burdened staff. Why is Phase 3 linked to expansion? What does 10% expansion have to do with having a functional program infrastructure and implementation?

The majority of legacy cultivators do not want to expand their farms and are against greater expansion in the County. Small, legacy cultivators are the backbone of what makes cannabis from Mendocino County highly-prized well beyond our county—why not take the visionary step of branding Mendocino Cannabis as originating only from small legacy farms? I keep hearing people who represent outside-the-County-investor-backed corporations say that "Small farms aren't viable." As a small farmer, among a community of small farmers, I will tell you that is patently untrue. Our farm is a profitable small business. We are not greedy. We are not trying to make millions; we are making a living. Legacy cultivators are both the origins and the future of cannabis in Mendocino County. Expansion will hurt legacy cultivators by paving the way for large corporate entities that will dilute the quality of cannabis from this region. Take a stand against expansion! We don't want Mendocino County to be yet another example of Big Agriculture pushing out small farms! We don't want to pave the way only for vertically integrated, large scale businesses; there is room for the County to also pave the way for family-run, legacy craft cannabis farms like ours, too.

The folks that say we need to be growing in the manner and at the scale of growing operations in Southern CA and the Central Valley are trying to apply a mode that is not in line with the reality and the history of the cannabis industry (nor any other agriculture) in our County. We are craft, farm-to-table, Mom and Pop cannabis. We have the advantage of a legacy and reputation of cannabis cultivation that is a huge marketing advantage and opportunity for tourism that isn't

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possible in those other places.

The potential money Big Agriculture and corporate cannabis might make in Mendocino County will not go back into our County, but to corporate outside-of-Mendocino-investors. Legacy cultivators have and will continue to invest in our farms and businesses here, where we have made our homes. The Mendocino County BOS should focus on supporting the families, farms, and businesses of legacy cultivators who are already here (and want to stay here!).

Finally, to quote one of the folks who is actually for 10% expansion, who recently spoke at a "town hall" on Phase 3: "Public policy is public discourse, written into law." Consider the amount of public discourse on this issue and note how much of that discourse is about NOT wanting this expansion. This overwhelming opposition cuts across a diverse range of stakeholders and should be a giant red flag to the Planning Commission and the BOS that the public does not want this written into law.

As a resident of the 3rd district, I support the Covelo Cannabis Advocacy Group (CCAG) memo and want to voice my personal opposition to 10% acreage expansion.

Thank you for your time concerning this important agenda item.

Respectfully--
Michelle Peñaloza
Ventoso Farms

Michelle Peñaloza
michellepenaloza@gmail.com

pbscommissions - Agenda Item 6B

From: Susan Obrien <susanobrien42@gmail.com>
To: "pbscommissions@mendocinocounty.org" <pbscommissions@mendocinocounty.org>
Date: 3/19/2021 12:44 AM
Subject: Agenda Item 6B

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MAR 19 2021

Planning & Building Services

Dear Planning Commission Board,
As a resident of the 3rd district, I support the Covelo Cannabis Advocacy Group (CCAG) memo and want to voice my personal opposition to 10% acreage expansion. Please cap outdoor cultivation to 22,000 sq ft, and mixed light/indoor to 10,000 sq ft.

Thank you for your time concerning this important agenda item.

Respectfully,
Susan Obrien

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pbscommissions - Fwd: Public comment Memo for Planning Commission meeting - March 19th, 2021

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MAR 19 2021

From: Stuart Marcus <stuart2202@gmail.com>
To: <pbs@mendocinocounty.org>, <pbscommissions@mendocinocounty.org>
Date: 3/19/2021 1:12 AM
Subject: Fwd: Public comment Memo for Planning Commission meeting - March 19th, 2021

Planning & Building Services

Dear Planning Commission Members,

My name is Stuart Marcus. I am a local Mendocino County business owner. I am writing on behalf of myself, my family, and my community.

On the whole we support the MCA memo of March 15th 2021 to the Mendocino planning commission, but we do have some differences of opinion and some comments to add. More specifically:

1. Under the current environment, in most cases a requirement for a Major Use Permit for cannabis is a dead end. Even under the best of circumstances, the County simply does not have the resources to engage all applicants in the process of approving a Use Permit application in a reasonable timeframe. We believe any plan that requires this step for a majority of permittees is a prescription for failure not only for the permittees, but also for the County as well. A program designed to fail is a formula to have potential legal participants slide back into unregulated cannabis activities.
2. Regarding the agenda item on Cannabis facilities: We especially object to requiring a Use Permit for a shared distribution or processing building even on resource lands. At the most, it should be an Administrative Permit. Because of the county restrictions on canopy size some owners have been put in the position of having several licenses spread out across adjoining properties owned by the same owner. In some cases these licenses are held by differing business entities but still with a total canopy of under 1 acre and all under the control of the same local family land owners. If such a land owner is required to get a Use Permit simply to put a centralized building where all product can be processed, stored and distributed, permitting and expediting such a building becomes unrealistic which could result in more buildings and a greater environmental impact spread over a wider area as each premises will need to use their own buildings for processing, storing, bulk packaging, conducting bulk sales, and preparing for distribution.
3. Regarding the agenda item on Phase 3 Cannabis Cultivation: We generally support the 1 acre limit endorsed by MCA at this time but we do not support or agree with the idea that the two sun based types of cultivation (i.e. outdoor and mixed light) should be subjected to different sized canopy limitations. Additionally we believe that if expansion to an acre is not allowable on resource lands, that an expansion to 22,000 feet should still be allowable for permittees on those lands

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who were participants in the phase 1 application process and who have remained in good standing.

4. With respect to environmental concerns that have been directed at the expanding cannabis program, we object to both the tone and content of some of the submitted critical comments. Cannabis cultivators that have been willing participants in the County program have been one of, if not the, main drivers behind clean up on properties that have long needed it. Additionally these cultivators have been subjected to intensive, if not outright invasive, governmental scrutiny to assure adherence. The monitoring of both water diversion and water discharge is comprehensive and ongoing. Contrary to some submitted public comments, expansion will not enable wanton additional tree taking. In our experience Cannabis cultivators in the County program are very conscientious of their impact on the natural environment and while we understand and agree with many of the objections to large corporate farms, we feel that to oppose allowing local farmers to scale up to 1 acre, where appropriate, is to block the economic viability of the very community of long time family farmers in the County who have already invested so much to get themselves and the County program to this point.

Sincerely,
Stuart Marcus

pbscommissions - Agenda Item 6B

From: Mark Thies <ambersound11@gmail.com>
To: <pbscommissions@mendocinocounty.org>
Date: 3/19/2021 5:01 AM
Subject: Agenda Item 6B

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MAR 19 2021

Planning & Building Services

Dear Planning Commission Board,

As a resident of the 3rd district, I support the Covelo Cannabis Advocacy Group (CCAG) memo and want to voice my personal opposition to the 10% acreage expansion. Please cap outdoor cultivation to 22,000 sq.ft and mixed light/indoor to 10,000 sq.feet.

Also, I would like to add that as a community, we should not even consider letting the present corporations that want to enter our beloved Mendocino Cty. and fill it up with "Corporate Cannabis".

When this industry goes federal and it will, we need to show-up as a community that doesn't want that here. Believe me, if the "BIG CORPS" show up and take over, our cozy economy that the small farmers can provide with local taxation shopping will be gone!!!

Thanks for taking the time to listen to our concerns.

Kindest Regards, Mark Thies

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From: "The Observer- Jim Shields" <observer@pacific.net>
To: <pbscommissions@mendocinocounty.org>
Date: 3/19/2021 5:04 AM
Subject: March 19, 2021, Special Meeting:Agenda Item 6b. CASE#:OA_2021-0002
Attachments: Ltr-PBS Re Pot Ord.doc

Comments also attached

March 19, 2021

To: Mendocino County Planning Commission

Subject: Planning Commission, March 19, 2021, Special Meeting:
Agenda Item 6b. CASE#:OA_2021-0002

RECEIVED
MAR 19 2021
Planning & Building Services

Dear Honorable Members,

The latest data this week from the U.S. Drought Monitor shows that 99.22 percent of California remains in persistent drought conditions ranging from abnormally dry to exceptional drought. The only area designated as non-drought (normal) is a small slice in the extreme northwest corner of the state on the Oregon border.

Here in Mendocino County, the eastern two-thirds is categorized as "severe drought" while the western sector is in "moderate drought." Keep in mind, the first day of Spring is this Saturday when in most years we would be waterlogged after five consecutive months of double-digit rain totals, at least up here in the northern half of the county.

And just like everything else in this now second year of bizarre Pandemic-mania, we'll probably have to contend with the threat of wildfires following a 2020 that saw devastating and record-breaking conflagrations in California. Needless to say, tinder dry landscapes caused by a second straight year of drought conditions make for perfect firestorms.

By now just about everybody knows that the Board of Supervisors, with the exception of 3rd District Supe John Haschak, have tentatively agreed to expand cultivation, effectively removing all caps on pot (a grower with a minimum parcel size of 10 acres or larger could cultivate up to 10 percent of the parcel area) and open up rangeland to growing weed, despite opposition from a majority of County residents, the Sheriff, small cannabis farmers, environmentalists, and ranchers.

The economic model the Supes are pushing is bigger-is-better for pot cultivation and the prospective new tax revenues that will be generated by the large corporate model. And needless to say, the oft-heard commitment from County officials regarding the importance of ensuring small farmers remain a vibrant force in the emerging pot industry are just empty words. Even though everybody knows that you can't grow weed without water — and usually lots of it — the four Supes supporting the new rules appear to overlook that fact while at the same time recognizing that a drought is upon us.

Recently, 5th District Supervisor Ted Williams declared, "California is bracing for drought in 2021."

This past week, 1st District Supervisor Glenn McGourty, UC Cooperative Extension Winegrowing and Plant Science Advisor for Mendocino County since 1987, addressing the growing drought conditions in the Upper Russian River, said, "... the path to a bright future for the Upper Russian River

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includes a secure water supply for all of us. Water is truly at the essence of our community and every effort must be made to ensure a secure, reliable supply. Every drop of water that can be protected in the Upper Russian River is a net gain for all of us."

Yet counter-intuitively the Supes are hell-bent on opening up rangeland to cultivation knowing that such lands are notoriously dry, or have intermittent or unreliable sources of water, as well as expanding total acreage under cultivation with the 10% rule.

If those two rules are adopted, it doesn't take much to imagine the potential devastation that will occur to County water sources and watersheds whether it's during a drought or not.

I request that the Planning Commission reject the two proposed rules in their entirety.

Thank you for your consideration of this matter.

Sincerely,

Jim Shields
Editor & Publisher
The Mendocino County Observer
PO Box 490
Laytonville, CA 95454
(707) 984-6223- Phone

District Manager
Laytonville County Water District
PO Box 32
Laytonville, CA 95454
(707) 984-6444- Phone

March 19, 2021

To: Mendocino County Planning Commission

Subject: Planning Commission, March 19, 2021, Special Meeting:
Agenda Item 6b. CASE#:OA_2021-0002

RECEIVED
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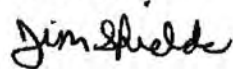
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I request that the Planning Commission reject the two proposed rules in their entirety.

Thank you for your consideration of this matter.

Sincerely,



Jim Shields
Editor & Publisher
Mendocino County Observer

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RECEIVED
MAR 19 2021

pbscommissions - Phase III, 3/19/2021

From: Tom Allman <tomallman@hotmail.com>
To: "pbscommissions@mendocinocounty.org" <pbscommissions@mendocinocounty.org>
Date: 3/19/2021 6:28 AM
Subject: Phase III, 3/19/2021

Dear Honorable Planning Commissioners:

Regarding the proposed change to the county zoning, which would allow rangeland to become weedland, I strongly request that you reject such a proposal. We have strived to keep a balance in Mendocino County, and now that balance is being swayed by corporate greed.

Can any single person convince us that there isn't already enough land to cultivate cannabis in Mendocino County?

Of course not. There are tens of thousands of acres available but corporate-America wants to suck up large tracts of rangeland and thumb their nose at what we have done to protect the integrity of our county.

Can any single person convince us that there is a danger of a cannabis shortage because of the lack of land to cultivate in Mendocino County (or any county in California)?

Of course not. There is a glut of cannabis and the price continues to plummet. The black market is now dominating the price of cannabis and encouraging growth on rangeland will only allow the dominance to continue.

Please understand your role as a planning commissioner. Your role is to maintain the integrity of the zoning ordinance(s) and prevent history from looking back and showing where the integrity was lost. We must not allow our generation to be the loose cannon that didn't think a solution through.

Please send a convincing signal to the Board of Supervisors, reminding them that they should not be loyal to the large cannabis corporations who want to dominate the cannabis market. Their (our) loyalty should be at the feet of our ancestors who worked hard to protect our range land and open fields for generations to come, not at the feet of corporations who want to turn millions into billions.

If there is ever a cannabis shortage in the future, maybe that would be the time to reevaluate but we all know that time will never arrive.

Tom Allman
Resident of the Third District
Sheriff, Retired

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Angie Lane - Fwd: Support for MCA Recommendations

From: PBS PBS
To: James Feenan; Angie Lane
Date: 3/18/2021 10:11 AM
Subject: Fwd: Support for MCA Recommendations

Planning & Building Services Staff

County of Mendocino

Main Office:

860 N. Bush St, Ukiah CA 95482

Phone: [\(707\) 234-6650](tel:(707)234-6650)

Coast Office:

120 W. Fir St, Fort Bragg CA 95437

Phone: [\(707\) 964-5379](tel:(707)964-5379)

Web: www.co.mendocino.ca.us/planning/

RECEIVED
MAR 19 2021
Planning & Building Services

>>> Nicholas Smilgys <nsmilgys@gmail.com> 3/18/2021 9:26 AM >>>

Commissioners - I ask that you review and adopt the recommendations provided by the Mendocino Cannabis Alliance. It is clear from talking with my neighbors, friends and peers the community does not support this proposed ordinance.

I understand that this is a complicated situation that requires action. I am in favor of expansion but I believe that it should be sustainable and measured. Small farms are the life blood of Mendocino, please do your part to help them survive and grow.

Please review these recommendations and consider them for your own recommendations.

Thanks,
Nicholas Smilgys
Founder/CEO Mendocino Cannabis Distribution
Policy Committee Member - MCA

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Angie Lane - Fwd: MCA Memo on Facilities Amendment item 6a

From: PBS PBS
To: James Feenan; Angie Lane
Date: 3/18/2021 10:30 AM
Subject: Fwd: MCA Memo on Facilities Amendment item 6a
Attachments: MCA_Facilities Amendment_6a 3-15-2021 Final.pdf

Planning & Building Services Staff

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>>> Michael Katz <Michael@mendocannabis.com> 3/18/2021 8:54 AM >>>

Good morning,

I'm attaching our suggestions for additional considerations related to the proposed Facilities Amendments that we believe will benefit the community and the program.

Please let me know if you have any questions or if I can provide any additional information.

I look forward to speaking with you on Friday at the meeting :)

--

Michael Katz

Executive Director

Mendocino Cannabis Alliance

MendoCannabis.com

e: michael@mendocannabis.com

o: [707-234-5568](tel:707-234-5568)

289



Mendocino County Planning Commission
501 Low Gap Road
Ukiah, CA 95482

March 15, 2021

Re: 6a. OA_2021-0001 on 3/19/2020 - Facilities and Special Events

Review and consider a recommendation to the Board of Supervisors on proposed adoption of an Ordinance Amendment to Mendocino County Code Chapter 6.16, Chapter 6.36, Chapter 20.168, and Chapter 20.243 regarding cannabis facilities and special events.

Honorable Planning Commission,

MCA supports the recently proposed amendments to ordinances expanding regulations regarding events, farmer's markets and tours, cannabis business activities and facilities use. Removal of temporary cannabis facilities business licenses is a welcome example of streamlining the process. Some changes, such as removal of churches as a sensitive site and preparation of pre-rolls by licensed distributors achieve already recognized consistency with state regulatory language.

MCA recommends the following further changes:

1. **MCA urges the creation of a full stand-alone Microbusiness license permitting activities in all zones where cultivation is allowed.**
2. **MCA advocates increased allowances for non-cultivation permits, including non-volatile manufacturing, to be issued as accessory to existing cultivation operations in all zones where cultivation permits are allowed. MCA supports opening up commercial cannabis activity through Cannabis Farmers' Markets, Farm Tours, and Events. In further support of these commercial tourism opportunities, MCA recommends the following:**

(a) Current Ordinance language: No Cannabis Farmers' Markets shall be conducted in a visibly public location, such as a park, street, or on any school grounds. Public fairgrounds are not included in this prohibition.

MCA recommends allowing communities to hold them in public locations as long as there is controlled entry and exit access to the market. (This is especially necessary for places that do not have the option of holding farmer's markets on private property, such as Covelo, Pt. Arena, and Laytonville.)

(b) Current Ordinance language: Farm Tours: [Under §20.243.040 (D) Retailer/Dispensary. Farm tours will be permitted as an accessory use provided that no more than one tour per week and subject to a Minor Use Permit.

Allows provision and sale of cannabis or cannabis products on farm tours but restricts this allowance to one (1) tour per week.

MCA recommends removing the restriction on the number of tours allowed each week and allowing one tour per day.

MCA further recommends that Farm Tours not be required to obtain a Minor Use Permit and instead be required to obtain an administrative permit (see suggested revision to zoning code, attached).

3. Distribution may occur in AG, RL and FL with a MUP.

MCA suggests that Distribution be allowed in AG, RL and FL with a Minor Use Permit. And this sentence be added: "Distribution may continue to be allowed in Commercial zones with an Administrative Permit." This would be consistent with County code Section 20.243.040 (E) for distribution: (1) Distribution shall "be a commercial use type" and (2)(a) A Distribution CFBL holder shall apply for a Distributor license with the state.

4. Under §20.243.040 (D) Retailer/Dispensary.

MCA recommends removal of this language: "On-site consumption shall not be permitted within any area that is considered a "building" as defined by Mendocino County Code 20.008.022(F)."

Change to be consistent with state regulations: §5025 (f) Adhere to Bus & Prof Code 26200(g):

(g) Notwithstanding paragraph (1) of subdivision (a) of Section 11362.3 of the Health and Safety Code , a local jurisdiction may allow for the smoking, vaporizing, and ingesting of cannabis or cannabis products on the premises of a retailer or microbusiness licensed under this division if all of the following are met:

- a. Access to the area where cannabis consumption is allowed is restricted to persons 21 years of age or older.**
- b. Cannabis consumption is not visible from any public place or nonage-restricted area.**
- c. Sale or consumption of alcohol or tobacco is not allowed on the premises.**

5. §20.243.050 General Limitations on Cannabis Facilities

Current language: Setbacks. §20.243.050 (B) requires that cannabis facilities not be allowed within 1,000 foot radius of youth-oriented facility, a school, a park, or residential treatment facility..."

Change to be consistent with county regulation §20.243.110 (A)(2) "The parcel(s) on which the event is hosted shall be located at least six hundred (600) feet from any youth-oriented facility, school, and/or park..."

As well as state regulation: § 5026. Premises Location

(a) A premises licensed under this division shall not be located within a 600-foot radius of a school providing instruction in kindergarten or any grades 1 through 12, day care center, or youth center that is in existence at the time the license is issued.

6. §20.243.110 Cannabis Events

Current Language: All cannabis events shall be subject to the following general requirements:

- (1) The parcel(s) on which the special event is located shall become permitted with the applicable State licensing body prior to the dates of the cannabis event.
- (2) The parcel(s) on which the event is hosted shall be located at least six hundred (600) feet from any youth-oriented facility, school, and/or park. The distance between the uses listed in the preceding sentence and the event shall be measured in a straight line from the property line of the event venue to the nearest point of any fenced, maintained or improved area where the users of the sensitive receptor are typically present during normal hours of operation.
- (3) All retailers shall be licensed with both local and state entities.
- (4) If a special event allows attendance by persons under the age of twenty-one (21), the sale of cannabis and cannabis products shall be conducted in a secure and secluded location at the event only accessible by a controlled entrance.
- (5) If a special event includes the provision of alcohol, the sale of cannabis and cannabis products shall be conducted in a secure and secluded location at the event only accessible by a controlled entrance.

MCA recommends that the “use” referred to in subsection (5) be amended to read: “If a special event includes the provision of cannabis and alcohol, the sale and use of alcohol and alcohol products shall be conducted in a secure and secluded location at the event only accessible by a controlled entrance.”

Finally, we urge the county to integrate this more expansive language for the facilities use ordinance into the Local Coastal Plan and expedite its inclusion on the Coastal Commission agenda.

Presentation of an LCP that included regulations for cannabis was directed by the BOS to staff to be prepared in the wake of votes passed unanimously at the November 2019 BOS meeting held on the coast. Cannabis operators have been patiently waiting since then for Coastal Commission consideration and approval of a new Coastal Plan for Mendocino County.

Thank you for your kind consideration.

Mendocino Cannabis Alliance

Permit Requirements for Processing, Manufacturing, Testing, Retailers, Distribution, and Microbusiness MCA Recommendations in Blue type								
by Zoning District and Adult Use Cannabis Facilities Code Permit Type								
			6-A and 6-M	7-A and 7-M	8-A and 8-M	10-M and 10A	11-A and 11-M	12-A
	Permit Type							
	RR 2	-	-	-	-	-	-	-
	RR 5	-	-	-	-	-	-	-
	RR 10	-	-	-	-	-	-	-
	R3	-	-	-	-	-	-	-
	RC	AP	AP	UP	UP	UP	UP	UP
	SR	-	-	-	-	-	-	-
	AG	AP	-	-	-	-	UP	-
	UR	AP	-	-	-	-	-	-
	RL	AP	-	-	-	-	UP	-
	FL	AP	-	-	-	-	UP	-
	TPZ	-	-	-	-	-	-	-
	C1	AP	MUP	-	-	ZC	AP	-
	C2	AP	UP	-	ZC	ZC	AP	AP
	I1	ZC	ZC	AP	ZC	UP	ZC	AP
	I2	ZC	ZC	AP	ZC	UP	ZC	AP
	PI	ZC	ZC	AP	ZC	UP	ZC	AP
	—=Not Allowed, ZC = Zoning Clearance, AP = Administrative Permit, UP = Minor Use Permit, MUP = Major Use Permit							
	* See Section 20.243.040(A)(2) regarding processing of cannabis grown on site. ** See Section 20.243.040(B)(2) regarding home manufacturing exception. *** See Section 20.243.040(D)(6)(c) regarding on-site consumption for cultivation sites.							

Angie Lane - Fwd: OPPOSE AGENDA ITEM 6b

From: PBS PBS
To: James Feenan; Angie Lane
Date: 3/18/2021 2:42 PM
Subject: Fwd: OPPOSE AGENDA ITEM 6b

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>>> <harreschou@pacific.net> 3/18/2021 9:34 AM >>>

I strongly oppose Agenda Item 6b.
Please

1) Keep the current ordinance, but improve and ENFORCE it. The discretionary use permit system in the proposed new Mendocino Commercial Cannabis Activity Ordinance (MCCAO) relies too much on individual planners and a planning department that has never inspected or monitored a single use permit in recent history). If the Board insists on pursuing the new proposed against the will of the people they should:

2) Not adopt the MCCAO without doing an EIR;

3) Not open Rangelands to new permits (extreme fire risk; terrible impacts on rivers, fish, water table, soil stability, oaks and other native plants, wildlife and wildlife corridors, beauty, peace, night sky, fabric of our community, etc (see letters below);

4) Keep the current cap on grow size and number of permits per parcel (2);

5) Direct county staff to process the hundreds of applications for state licensing they've been sitting on, beginning immediately. The existing ordinance would work if county staff would stop obstructing the process.

I have been a resident of Potter Valley for many years. I have raised my children here and am watching my grandchildren grow up here. Two of the

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Board of Supervisors have visited here in recent months meeting with citizens that are very concerned with our growing cannabis problem. We have a "grow" next to our community playground. There is no enforcement from County to put a stop to these illegal sites. Water is being illegally siphoned from creeks, river and irrigation canals. Agricultural land is being covered with yards of base rock for hoop houses.

Please oppose Agenda Item 6b.
Thank you

Patricia E. Harreschou

Angie Lane - Fwd: Fwd:

From: PBS PBS
To: James Feenan; Angie Lane
Date: 3/18/2021 2:46 PM
Subject: Fwd: Fwd:

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>>> charlotte beaumont <cmbeaumont53@gmail.com> 3/18/2021 9:52 AM >>>

No to expansion. Take it out of the phase 3 ordinance and allow us to vote on it. In the north county we are opposed because we have experienced the negative impacts from the out of county, out of state and out of country entities targeting our community. CannaRoyalty in Ottawa Canada aka Origin House. aka Heritage Holding of Calif Corp , aka Henrys Original. These entities are buying properties in anticipation of the expansion. STOP the water grab. Let us vote.

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3/18/2021

To: Planning Commission
Cc: Mendocino County Board of Supervisors

Re: Commercial Cannabis Activity Land Use Ordinance.” (Agenda item: 6B).

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Dear Planning Commission and Supervisors

I will be brief. As a long time resident of Mendocino County (39 years) and a 7 year resident of Covelo, I agree with the many letters submitted, that passage of the proposed Land Ordinance is not in the best interest of our County.

While it is tempting to open up opportunities for more money to come into the County, via cannabis cultivation by larger growers, thereby (possibly) funding the resources needed to support our cannabis industry, the potential for failure far outweighs the potential for success. I do not see any protections for land, water, esthetics or community safety described in this ordinance that reassure me that greed and shortsighted goals will be mitigated or contained. Are we going to allow the foxes free reign in the hen house?

As stewards for our County I ask you to consider the long-term effects of an expanding cannabis industry, which is already under enforced and under supported, on our land, water resources and current residents. We are trusting you to look out for the County. As the many letters you have already received state, we are not ready for such an expansion nor are we even sure we have the water or people resources to support an expanding cannabis industry. We are counting eggs that have not even been laid.

Thank you for your attention,

Marilyn Magoffin
Covelo

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Angie Lane - MCA Proposes Alternative to 10% Expansion

From: Michael Katz <Michael@mendocannabis.com>
To: Mendocino Cannabis Alliance <info@mendocannabis.com>
Date: 3/15/2021 2:00 PM
Subject: MCA Proposes Alternative to 10% Expansion

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Good afternoon!

In Advance of the Planning Commission meeting scheduled for Friday, March 19, MCA has prepared a [Memo with an alternative proposal](#) to the currently proposed Commercial Cannabis Activities Ordinance, with specific recommendations rooted in years of cannabis policy work and our mission statement.

We are supportive of the development of a conditional land use permit program for cannabis cultivation in Mendocino County. We recognize that this is a necessity. However, the current draft ordinance, as introduced, does not solve the problems our County continues to face in permitting and regulating commercial cannabis operations.

Our recommendations comprise a holistic proposal to regulate commercial cannabis cultivation that simultaneously would provide a viable pathway for a) existing operators, b) new cultivation sites, and c) expanded cultivation activities, all with an emphasis on sustainability and the protection of our environment, natural and cultural resources, and way of life. We believe that this is what a majority of Mendocino County's residents are seeking from our local government, and we believe that a majority of the cannabis industry wants this as well.

[CLICK HERE](#) to read the full Memo with our recommendations.

Virtual Town Hall Today 4 - 5:15PM

Featuring policy makers discussing the proposed Phase Three commercial cannabis cultivation ordinance.

This virtual town hall meeting will feature policy makers and cannabis industry experts discussing the Mendocino County Board of Supervisors' proposed Phase Three commercial cannabis cultivation ordinance.

The panelists include John McCowen, Former 2nd District Supervisor who championed the development the Phase 3 Ordinance, 5th District Supervisor & Cannabis Ad Hoc Committee Member Ted Williams, newly hired Cannabis Program Manager Kristin Nevedal, attorney Joe Rogoway of Rogoway Law Group, and Patrick Sellers, Board Chair of Mendocino Cannabis Alliance.

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The event will take place via Zoom and live streamed via The Mendocino Voice's Facebook page at facebook.com/MendoVoice

The program will include a public Q&A. Email your questions to: publisher@mendovoice.com

Join via Zoom: <https://zoom.us/j/93174973092>

Zoom passcode: phase3

There will be more information coming this week to prepare for the Planning Commission meeting!

In solidarity,
Michael

--

Michael Katz
Executive Director
Mendocino Cannabis Alliance
MendoCannabis.com

e: michael@mendocannabis.com
o: [707-234-5568](tel:707-234-5568)

--

You received this message because you are subscribed to the Google Groups "Active MCA Members" group.

To unsubscribe from this group and stop receiving emails from it, send an email to MCAMembers+unsubscribe@mendocannabis.com.

Angie Lane - Fwd: MCA Policy proposals

From: PBS PBS
To: James Feenan; Angie Lane
Date: 3/18/2021 2:49 PM
Subject: Fwd: MCA Policy proposals

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>>> wildercraft sungrown <wildercraftsg@gmail.com> 3/18/2021 10:16 AM >>>

Good morning,

I am a cannabis cultivator who has been operating legally, first under prop 215, 9.31 and currently under Prop 64. I have been operating in good faith with the understanding that there was a pathway forward to compliance within the county of Mendocino(this is my home.) I came in to compliance in good faith because I want this industry to be legal, safe, sustainable, good for the environment and positive for the larger community of mendocino county.

I am a tax paying citizen, a business owner and community member of Mendocino County.

I SUPPORT THE POLICY PROPOSALS OF THE MENDOCINO CANNABIS ALLIANCE.

We need a pathway forward to stay in compliance with county and state regulations.

I would hope that the county can move forward with the understanding that there is a cohort of cannabis cultivators and business owners that are eager to work with the county to make this a thriving industry that is beneficial for all residents within Mendocino county.

I feel MCA's policy proposals reflect the best pathway forward to legacy cannabis cultivators and the community at large.

Thank you for your time and consideration.

Onward and Upward,

Jared Adams

[7076211152](tel:7076211152)

Wildercraft Farms

Boonville, CA

Sent from my iPad

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From: <harreschou@pacific.net>
To: <bos@mendocinocounty.org>, <phs@mendocinocounty.org>
CC: "Johnny" <johnnyscatena@yahoo.com>, "Shannon Aiello" <shanaaiello@gmail.com>
Date: 3/18/2021 9:31 AM
Subject: OPPOSE AGENDA ITEM 6b

I strongly oppose Agenda Item 6b.
Please

1) Keep the current ordinance, but improve and ENFORCE it. The discretionary use permit system in the proposed new Mendocino Commercial Cannabis Activity Ordinance (MCCAO) relies too much on individual planners and a planning department that has never inspected or monitored a single use permit in recent history). If the Board insists on pursuing the new proposed against the will of the people they should:

2) Not adopt the MCCAO without doing an EIR;

3) Not open Rangelands to new permits (extreme fire risk; terrible impacts on rivers, fish, water table, soil stability, oaks and other native plants, wildlife and wildlife corridors, beauty, peace, night sky, fabric of our community, etc (see letters below);

4) Keep the current cap on grow size and number of permits per parcel (2);

5) Direct county staff to process the hundreds of applications for state licensing they've been sitting on, beginning immediately. The existing ordinance would work if county staff would stop obstructing the process.

I have been a resident of Potter Valley for many years. I have raised my children here and am watching my grandchildren grow up here. Two of the Board of Supervisors have visited here in recent months meeting with citizens that are very concerned with our growing cannabis problem. We have a "grow" next to our community playground. There is no enforcement from County to put a stop to these illegal sites. Water is being illegally siphoned from creeks, river and irrigation canals. Agricultural land is being covered with yards of base rock for hoop houses.

Please oppose Agenda Item 6b.
Thank you

Patricia E. Harreschou

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March 18, 2021

Mendocino County Board of Supervisors
501 Low Gap Rd.
Ukiah Ca. 95482

Re: Cannabis Expansion Ordinance

Dear Board Members,

Mendocino County is at a crossroads. What is decided now will determine what our County will be like generations from now. It is vitally important to “get it right”, not hurry to a decision without taking the proper time to explore all options, and to ask for and receive, community input. I think it is important to maintain a balance in our County and not let one industry become dominant to the detriment of the quality of life and diversity that is Mendocino County. I am in favor of well thought out policies for legal cannabis that protect our land, water resources, farming and ranching communities, and all the people who live in the County.

My primary residence is in Covelo. I also have a home in Albion. My wife and I are long time County residents. Living in Covelo I see the “worst of the worst”, regarding out-of-control illegal cannabis: violent crime, visually ugly deplorable “grows”, night time light pollution, water trucking to remote sites far from the valley, etc, etc. When I am asked to “sign on” to the cannabis expansion ordinance (10% of property size) , the first question I ask is “how is the County handling the current situation?”. The answer is: it isn’t. There is virtually no enforcement to shut down illegal grows, very little to deal with violent crime, cartels etc. The growers under phase one and two are continuing to expand while supposedly in the permit process, without any environmental review. Water is becoming an issue as wells in the Northwest part of the valley are dropping, as they have never done before, even in long ago drought cycles.

If the County approves this ordinance there will be a land grab by well-funded entities that will have the resources to leverage what they want in the permit process. If this new process begins, the illegal grows described above will also continue, making the problem that much more complex and unwieldy. Two days ago the Mendocino Voice put on a public Zoom meeting to address this ordinance, the question was asked about the need for enforcement. The answer was: “ we will have to staff up”. If it’s not happening now, then why would anyone believe that it will happen after the “flood gates” are opened with this ordinance? The staff report to the Planning Commission states, under “General Plan Consistency Analysis”, that this ordinance “would not constitute an increase in environmental impact or change to existing land use provisions”. No environmental impact? No change to existing land use provisions? Does anyone believe this? For one, we will lose the prohibition on new operations in the County’s Rangeland Zone. The ordinance also leaves out Standards and Requirements for cultivation. I assume that the Planning Dept would put this in place, or waive these unwritten standards, as they see fit. What gets approved will be behind closed doors. One supervisor recently told me that hoop houses and greenhouses would not be allowed under this ordinance. There is nothing written in the draft ordinance to prevent this. Is this another “we will see about this later”? This ordinance does not spell out for the community exactly what it is proposing.

I think that everyone should take a look at who is against this ordinance:

The Mendocino County Farm Bureau

Supervisor Haschak

Sheriff Kendall

The Ukiah Daily Journal

The entire environmental community

A substantial portion of the small legacy growers (many of whom feel abandoned by the County).

Most, if not all, of the public comments to date

I would suggest that this ordinance, as it is, be rejected. The County must first prove that it can handle what is on its plate now, before thinking about expanding further. If we do end up with a use permit process, let that be well defined with Standards and Requirements, making sure there is a pathway for those in the phase one and two permit process to secure their permits. Once the County can handle what it now has, then and only then should we talk about expansion. We must always ask ourselves “what is the shared vision for our County”?

Best regards,
Ron Stark
Covelo/Albion

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297

Angie Lane - Cannabis expansion

From: vashti o'donnell <vashtirose@hotmail.com>
To: "bos@mendocinocounty.org" <bos@mendocinocounty.org>
Date: 3/18/2021 10:15 AM
Subject: Cannabis expansion

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Dear BOS,

Please save us from furthering the destruction of our county by legal cannabis. It does not serve the best interest of those who live here, including all wildlife and open space. Such an expansion would further the divide between small town, long time locals, and outside, economic interests, not to mention neighbors. The increase in traffic, light pollution, trash along the roadsides, carving out hillsides, water truck deliveries going all hours of the day and night, the use of harmful and toxic chemicals is devastating what is left of something wild and free. To increase the amount of land to grow beyond what it is currently sounds like a nightmare and I hope for the sake of all of us who live here and love it, that IT DOES NOT PASS.

Sincerely,

Vashti O'Donnell

298

Angie Lane - Fwd: agenda item 6B Mendocino Commercial Cannabis Activity Ordinance (Cannabis Phase 3).

From: PBS PBS
To: James Feenan; Angie Lane
Date: 3/18/2021 3:13 PM
Subject: Fwd: agenda item 6B Mendocino Commercial Cannabis Activity Ordinance (Cannabis Phase 3).

Planning & Building Services Staff

County of Mendocino

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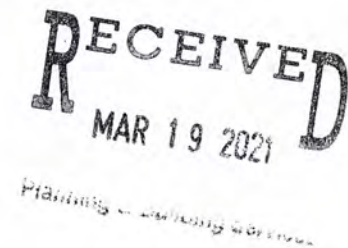
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>>> Barbara Ware <baware11600@outlook.com> 3/18/2021 11:37 AM >>>

Dear Planning Commission and Board of Supervisors:

I am directly opposed to the adoption of this ordinance for many reasons, among them the fact that this ordinance will eliminate the many protections we have in place with the ordinance that already exists including:

- * The prohibition on new operations in the County's Rangeland Zone.
- * The cap on the size of the grow sites of 10,000 sq. ft. per permit
- * The 2-permits-per-parcel limitation
- * The protections against tree removal
- * The generator phase-out timeline
- * The protections against light pollution.

Instead of strengthening our ordinance, *this new proposal will eliminate all of these protections* and it will allow for a massive expansion of the size and number of cannabis grows in the county, including large commercial grows through a Use Permit process. Use Permits are issued for a minimum of 10 years with indefinite renewals and accompany the property regardless of the owner. Historically Use Permits in this county are rarely, if ever, monitored by county staff.

Of particular concern is the provision that would open all of our Rangelands to development, and allow up to 10% of a parcel 10 acres or more in the Ag, Upland Residential, and Rangeland zones to be converted to cannabis. For example, a 160-acre parcel could have sixteen acres of cannabis. That would be destructive to the small family grower, and it will not be environmentally sustainable.

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The **Farm Bureau does not support** this new proposal, the **small cannabis grower does not support it**, our **Sheriff does not support it**, and the **environmental community does not support it**. And this new proposal is NOT the Vision supported by the majority of citizens of this county, as evidenced by the fact that Measure AF, which proposed cannabis in almost every zoning district, went down to defeat in 2016.

This proposal wholly ignores the recommendations of the Mendocino Climate Action Committee regarding appropriate land use development to meet the need for greenhouse gas reduction and carbon sequestration goals.

It also ignores the goals of our new federal administration which is calling for 30% of our lands to be set aside to try to stem the collapse of our wildlife population from climate change. If we were to continue preserving our Rangelands we would be able to meet that 30% goal.

If we hope to have even a semblance of a salmon fishery again we will have to have cool running streams and rivers. Not the hot, shallow, and algae-choked rivers we are seeing now across our county. Our water has already been over-allocated if we hope to meet the challenges of climate change in the years ahead, and unfortunately, cannabis likes a lot of water and a lot of fertilizer. Also, there is no proposed funding for a remedy to the abject failure of the citizen-driven complaint system of enforcement that we have now. The county does not have the budget, the staff, or the track record to responsibly invite a big expansion of cannabis operations at this time.

A change of this scale should be broadly and openly discussed with the community, not sprung on the public and even some board members over the course of a weekend - making a mockery of our local democracy. And considering the magnitude of the expansion plan, the county, at the very least, should do a full Environmental Impact Review (EIR).

PLEASE DO NOT HASTILY PASS THIS NEW ORDINANCE WHEN THE OLD ONE SERVES US SO MUCH BETTER.

Thanks for your attention to this letter and I'm sure the opinion of the majority of residents of this county. Anything this IMPORTANT deserves more attention by a wider audience.

Barbara Ware

Angie Lane - Fwd: CCAG memo for 3-19-2021 PC meeting

From: PBS PBS
To: Angie Lane; James Feenan
Date: 3/18/2021 3:14 PM
Subject: Fwd: CCAG memo for 3-19-2021 PC meeting
Attachments: CCAGPC3.19.2021memopages1-13.pdf; CCAG Survey Resultspages14-16.pdf

Planning & Building Services Staff

County of Mendocino

Main Office:

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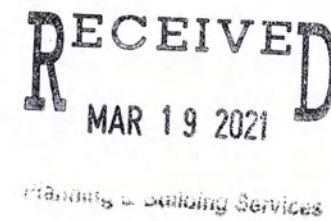
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>>> Covelo Cannabis Advocacy <covelocannabisgroup@gmail.com> 3/18/2021 12:21 PM >>>

Good afternoon,

Attached please find the CCAG memo for the Planning Commission meeting.

The memo has 2 attachments, which we hope can be included as 1 document with the survey document following the 3-19memo.

Thank you so much.

Respectfully,

--

Monique Ramirez

Founder- Covelo Cannabis Advocacy Group

Cell: [707-354-8406](tel:707-354-8406) covelocannabisgroup@gmail.com

360



March 18th, 2021

Re: Planning Commission Special Meeting March 19th
Agenda Items 6a and 6b

Dear Honorable Planning Commission Board Members,

The Covelo Cannabis Advocacy Group (CCAG) is comprised of cannabis cultivators in Round Valley/Covelo area seeking commercial cannabis licenses. We regularly attend Board of Supervisors meetings, engage in policy advocacy at both the State and County level and meet weekly. We represent the interests of small legacy producers in our region. The farms in our group range from specialty cottage outdoor to 10,000 sq ft family farms. Many of our CCAG members use regenerative farming practices, no till methods and incorporate bio-diverse practices in their gardens with interplanting of other crops such as vegetables and flowers.

CCAG has been tracking the developments of the Commercial Cannabis Activity Land Use Development Ordinance (CCAO) very closely. We have strong concerns about the recommendations before you for Agenda Items 6a and 6b. We want to first bring attention to the issues of conflict of interest. CCAG submitted a memo to County Counsel and the Board of Supervisors on March 9th 2021 expressing our concerns. A copy was also submitted to all members of the Planning Commission. We researched the Conflict of Interest Code Mendocino County document, Appendix D, which states:

"County Officers, Boards and Commissions required to file Conflict of Interest Disclosure Statements pursuant to Government Code Section 87200 are not subject to County Conflict of Interest Code including County Planning Commissioners"

CCAG would like transparency and clarity as to what types of rules apply to Planning Commission members, especially under these circumstances. If committee member Randall Jacobszoon or Gregory Nelson have potential financial interests in the CCAO recommendations, we respectfully request their recusal of this special meeting.

Of all the recommendations being brought forward at this time, the greatest cause of concern is the allowance for 10% acreage expansion of Ag Land, Rangeland and Upland Residential parcels. These specific zoning types would require a Major Use Permit for Upland Residential & Rangeland and a Minor Use Permit for Ag Land as currently proposed in Attachment A of Agenda Item 6b. CCAG has been tracking organizations and businesses that are also not in support of this specific recommendation. At the time of this written memo, the following organizations or representatives have expressed opposition or concerns:

1. Mendocino County Climate Action Committee
2. Round Valley Area Municipal Advisory Council
3. Laytonville Municipal Advisory Council
4. Redwood Valley Municipal Advisory Council
5. Mendocino County Sheriff's Department
6. Covelo Community Services District
7. Mendocino Cannabis Alliance
8. Willits Environmental Center
9. Round Valley County Water District
10. Covelo Cannabis Advocacy Group
11. Third District Supervisor John Haschak
12. MM Feed Supply

There are currently 112 letters of opposition and 1 letter of support uploaded to the Agenda specific to the 10% recommendation. **We are one of MANY stakeholders that unequivocally do not support 10% acreage expansion.** We strongly urge the Planning Commission to consider the input of such a diversified range of stakeholders in Mendocino County that are expressing strong opposition against this size of expansion.

A petition has also been generated by the community and is currently in circulation. At the time of this written memo, **there were over 1100 signatures and counting, in opposition to the 10% acreage allowance!** The petition can be accessed by following this link:
<https://www.change.org/Stop10percentExpansion>

The Cannabis Business Association of Mendocino County stated during their town hall forum on March 15th, that *"public policy is community discourse written into law."* If the majority of our community does not support the recommendation then it would be reckless and injudicious of government leadership to go against the will of the people of Mendocino County.

CCAG has made a recommendation on several occasions to the Board of Supervisors to allow up to a MAXIMUM of 22,000 sq ft of cultivation for ALL Phase 1 and Phase 3 Outdoor cultivators and capping Mixed Light and

Indoor Operations to 10,000 sq ft. We still hold strongly to this value and recommendation.

CCAG has always felt that community engagement is essential to craft regulations that match the values of the people. We put together a countywide survey on the topic of expansion following the Board of Supervisors meeting in February, to get a better understanding of how Mendocino County residents feel about the topic of cultivation expansion. We sent the survey out broadly to as many organizations and individuals as we could reach. It was emailed to over 32 outlets, including:

- KZYX radio station
- KYBU radio station
- Round Valley Area MAC
- Redwood Valley MAC
- Laytonville MAC
- Guala Mac
- Westport MAC
- Willits Environmental Center
- Mendocino Generations
- Mendo Voice
- Mendo Fever
- Mendo Canna Action Facebook Page
- Mendocino County District 1 Facebook Page
- Mendocino County District 2 Facebook Page
- Mendocino County District 3 Facebook Page
- Mendocino County District 4 Facebook Page
- Mendocino County District 5 Facebook Page
- Covelo Cannabis Advocacy Facebook Page
- Covelo Community Watch and News Facebook Page

We had a total of 295 survey participants.

58.3% represented the cannabis community

41.7% were strictly a Mendocino county resident not involved in cannabis

291 participants that answered the question:

"Do you support allowing Phase 3 cultivators in Range Land, Ag Land or Upland Residential to cultivate 10% of their parcel acreage with a Major Use Permit"

64.95% (189 votes).....NO

32.03% (94 votes).....YES

2.4% (7 votes).....Undecided

.3% (1 vote) favored larger than 10%

When asked which plant canopy cap would be preferred:

33.5%.....10,000 sq ft
31.3%.....1 acre
22.8%.....10% of parcel acreage
12.5%..... 22,000 sq ft

When asked if they would support a 1-acre cap until interstate commerce opens up:

47.3%.....yes
38%no
12%.....undecided or with caveats

In Summary, the results of the survey¹ indicate that there is strong opposition for allowing 10% expansion.

CCAG also conducted a public records request #21-199 to find out how many parcels are zoned Ag, RL and UR in each District. It's worth mentioning the amount of opposition from organizations in District 3 considering it has the largest number of eligible zoned parcels for 10% expansion. The total number of AG, RL, and UR parcels combined by District are as follows:

District 3= 6,546
District 5= 5,584
District 1= 3,202
District 4= 450
District 2= 22

Data Request: 03-03-2021

ZONING	TOTAL NO. OF APNS	SUPERVISORS DISTRICTS				
		D1	D2	D3	D4	D5
AG	3304	1611	1	844	32	816
RL	8691	1105	0	3580	268	3738
UR	3809	486	21	2122	150	1030

We have many concerns about the CCAO extended expansion and have outlined our reasons below:

1. Licensing Logistics

a) Staff Bandwidth and Capacity

Our current Cannabis 10A.17 has been dysfunctional since day one. We have seen multiple Ag Commissioners, Planning Staff, Cannabis Managers, and Department heads come and go. The Cannabis Program moved from the Ag Department to Planning and Building Services several years ago with the intention to streamline the process; however, to this day many applicants do not have a County issued permit. The County has stated repeatedly that our Phase 1 operators will need to transition to a Phase 3

¹ Survey results beginning on Page 14

process because they won't be able to obtain their State Annual License due to CEQA issues by using the Appendix G #15168 checklist. We know that in Humboldt County they are operating with a Staff of approx 17 planners and are able to process a total of 70 Use Permits PER YEAR! With the projection of failure the County is estimating, that would mean nearly 990 applicants would need to be processed under the Phase 3 Use Permit model, yet no path has been detailed to explain how this would actually work. There has been no specific information to address the timeline for the County to be able to process this many applications. Even if the job was outsourced, it is very clear that many applicants will be waiting for years to be fully permitted. Only the well funded will be able to wait this long.

b) **Lack of Communication and Transparency with Applicants**

The County has issued approximately 198 permits incorrectly and still after months of knowing this, has not notified applicants of this error. How can we trust the County to manage an entirely new ordinance and have the Planning Staff review all of the Discretionary Permits submitted? Is the County Planning Commission prepared to deal with the high volume of applications that will be submitted under the Phase 3 application process? Is the Planning Commission prepared to handle this many public hearings and potential opposition from impacted neighbors that may choose to speak out against cultivation? How can we trust a system that requires applicants to submit sensitive documents to a plastic trash can with no security measures in place? How can the community possibly trust the County to be capable of implementing a new program at this time?

c) **Lack of oversight to ensure mitigation measures are in place for Use Permits.** Currently, the Board of Supervisors have expressed great trust in our use permit process and keep telling constituents that no permits would be approved if conditions could not be met for the project. However, back in October of 2020 during a BOS meeting, Senior Planner Julia Krog stated that nothing would be done to ensure mitigation measures were followed up on after a use permit was issued, unless there were complaints. This is very alarming to hear and calls into question the safeguards that are being referred to with the Use Permit Process.

d) **County Supervisors have mentioned that some conditions of a use permit could be waived.** Waiving any conditions of a use permit could potentially dilute the integrity of the use permit process. How can the County ensure that the administrator who handles these types of permits would use appropriate discretion?

- e) **The County should not create a license type larger than the State allows.** The largest State license Type 5 will not be made available until January 1st 2023. The State will only approve this license type if a need or shortage is identified in the supply chain. A Type 5 license will NOT BE eligible to hold a Type 8 (Testing), Type 11 (Distribution) or a Type 12 (Microbusiness) License. Mendocino County should not be considering expansion beyond what is currently allowed at the State level since a Type 5 License may not end up being available based on supply chain findings. If Distribution companies are planning to be vertically integrated and are promoting 10% acreage allowances but will not be allowed to hold a Type 5 License with a Type 11 License, it calls into question if they are intending to find a workaround? Mendocino County should consider adopting the same license restrictions. This further highlights that creating opportunities for only the well funded are not equitable and possibly create monopolies which are illegal.
- f) **Large corporate operations should not benefit from the lower tax rates of Mendocino County.** There has not been any discussion yet of potential structural tax changes to the CCAO, which should include increasing the sales tax for those wishing to expand beyond 10,000 sq ft. Part of the reason businesses are pushing for expansion in Mendocino County is because taxes are much lower here than in other jurisdictions. We should remind ourselves that our cannabis tax rate of 2.5% of cannabis sales was set with small farmers being capped to 10k sq ft. If the tax rate was raised, it may change the demand for those seeking to expand in our County.
- g) **The County must fully address the issues with and complete the work of Phase 1 before voting on any more expansion.** County Staff is already stretched past their capacity dealing with the current Phase 1 cannabis program; the BOS voting to expand the program to this magnitude is untenable and unwise. There needs to be an outlined timeline of how to prioritize and process Phase 1 applications first. Most Phase 1 applicants are going to attempt to use the Appendix G #15168 checklist, but if it fails then they will have to apply under CCAO and will need time to transition. Will County Staff have the bandwidth to handle the burden of cannabis permits if any expansion is approved? How long has each Staff member been employed with the County? We know that there is an incredible rate of employee turnover. This is very alarming when a new program is set to launch.

2. Environmental concerns

- a) **No cumulative impacts will be assessed on the CCAO if passed by July 1st 2021.** Business and Professions Code Section 26055 states "*CEQA*

does not apply to the adoption of an ordinance, rule, or regulation by a local jurisdiction that requires discretionary review and approval of permits, licenses, or other authorizations to engage in commercial cannabis activity. To qualify for this exemption, the discretionary review in any such law, ordinance, rule, or regulation shall include any applicable project-specific environmental (CEQA) review. This subdivision shall become inoperative on July 1, 2021." Therefore the CCAO would not be subject to CEQA analysis by the State because each project must meet site specific review. How can the County ensure that this lack of additional review will be sufficient and provide a proper analysis of accountability for all environmental and socio-economic impacts countywide? Especially if allowing larger scaled operations way beyond what is currently allowed.

b) **Water availability is a concern among many residents of this County.**

Every year we break new records with the lack of precipitation. Recorded² rainfall in Covelo from July 2019 to June 2020 was a total of 15.61 inches. Currently our total rainfall is 13.59 inches. We haven't seen a year with 15 inches or less of rainfall let alone multiple years with this trend. These numbers translate to less available water. This means less water for all living things. We understand that use permits examine water availability for a site, but how will the review assess things unaccounted for by climate change? Furthermore, the current BOD recommendation does not offer any strict guidelines for proof of water availability.

c) **Where will expanded sites source all of their needed amendments from? What kind of fertilizers would be used?**

How would excess nutrients be monitored for nitrogen toxification? As stated in Scientific American³, excess fertilizer runoff can overwhelm streams and rivers which creates vast dead zones. It's highly unlikely that a larger scaled farm would be able to produce all of their own soil and compost which means they would need to truck in supplies. The impacts from the amount of fertilizer that would be needed to supply a large scaled farm must be taken into consideration.

d) **Best Management Practices must be in place to encourage land stewardship.**

We encourage ALL operators no matter what scale, to strive towards regenerative farming practices and create as much biodiversity on the land as possible. Some examples of things that could be included in a Best Management Practices Guide include a commitment to growing a cover crop, flowers, vegetables and herbs to attract pollinators, not using perlite in soil mixes, sourcing bulk products to reduce plastic waste, using no till methods to create healthy soil, creating compost onsite, using

² www.coveloweather.info

³ www.scientificamerican.com/article/fertilizer-runoff-overwhelms-streams/

biodegradable products such as gloves and netting material for plant structural support, using 100% organic products for pest management and beneficial predators and nematodes. Would scaled operations be willing to make this type of farming commitment?

- e) **Cannabis cultivators have been reporting new pest invasions from russet mites, broad mites, and the hemp bhang aphid over the last several years.** These pests have devastated crops which could be attributed to the proliferation of increased illegal cannabis sites. How will operators maintain pest management practices on their farms if allowed to scale to 10%? Can they provide assurance to neighboring farms that they will not be contaminated? Will these larger sites have the proper staffing to identify pests when potential acres of cannabis would have to be inspected?
- f) **Pollen from hermaphrodite clones is a real threat.** Many operators use female clones but unfortunately it is not a 100% guarantee that the plants won't be hermaphrodite. These issues become magnified as operations scale up and can have devastating impacts to neighboring farms. How can operators wishing to expand ensure that hermaphrodite pollen will not be an issue? Farms growing for biomass would not be impacted from male pollen since their cannabis would be used for manufactured products.

3. Economic concerns

- a) **There are already plenty of products in the market with the existing tax-paying and compliant cultivators in Mendocino County.** The current market can't support large scaled operations at this time. Ask any cultivator in Mendocino County if they have sold all of their cannabis yet from 2020. It's very challenging to get products onto shelves especially when there are limited licensed retail locations across the State. Allowing more product to enter the marketplace is not the direction we should be going right now. Expansion will continue to exacerbate the flooding of an already saturated market, further pushing small farmers out of an already challenging industry.
- b) **If the County paves the way for continued vertical integration of large corporate cannabis to cut out legacy growers, there will not be any of us left.** The State requires that cannabis can only move off farm through a distribution license, forcing farms to have to contract with distribution companies or attempt creating a micro business. Unfortunately, most farms don't meet the zoning requirements for micro business licenses. Currently, of the 32 active Distribution licenses in

Mendocino County, 16 are Distributor Transport Only licenses, which means there are only a handful of full service distribution companies to contract with Mendocino County farms. If distribution companies hold cultivation licenses and are able to produce enough product through vertical integration, they will no longer need to source products from farms in the future. If farms don't have distribution options to sell products to then they will be forced to go out of business.

c) **Mendocino County should focus on supporting the families, farms, and businesses of legacy cultivators who are already *here*.**

The potential money big agriculture and corporate cannabis might make in Mendocino County will not go back into our County, but to corporate outside-of-Mendocino-investors. Legacy cultivators have and will continue to invest in their farms and businesses here, where they have made their homes.

d) **The outstanding reputation of Mendocino grown craft cannabis that is already recognized throughout the world should be protected.**

Mendocino County is famous for the quality of cannabis grown here and there is great value in preserving and protecting it. There must be a significant reason that well funded companies would choose to set up a business in a County that has favored smaller cultivation allowances if they had the intention of being as large as possible. Why didn't they set up a farm in another place that favors larger production such as Santa Barbara County? It's because Mendocino County already has brand recognition for producing high quality, craft, clean tested cannabis.

e) **We can't compare our County to neighboring counties and follow the same path they are choosing to take.**

There's a striking difference between neighboring counties allowing larger canopy allowances. Take for instance, Monterey County. How many small legacy producers did they have prior to Prop 64? Mendocino County has historically been cultivating for decades and has been made up of many small farms. Arguably the industry was created by legacy farmers. Other Counties that are allowing license stacking are putting the entire industry of small legacy producers at risk of being forced out of business and Mendocino County should not follow in these footsteps.

Recommendations from CCAG to the Planning Commission

1. Remove the asterisk in the Zoning Table that allows for 10% of acreage for UR, RL, and AG zoning

CCAG is in strong opposition to 10% acreage allowances and respectfully requests that this recommendation be removed entirely from the zoning table based on the diverse opposition from many members of the County and local cannabis community.

2. We respectfully request the recusal of Board members Randall Jacobszoon and Gregory Nelson from the vote of the Phase 3 Ordinance

As provided above and in our separate memo, we believe it's important for the Planning Commission to request the recusal of the 2 board members to avoid any potential conflict of interest that could arise. It should be noted that during the creation of the 10A.17 cannabis ordinance, former Supervisor Dan Hamburg recused himself because he had a direct family member involved in the cannabis program. We feel the potential conflicts of interest identified here are of legitimate concern.

3. Allow up to a MAXIMUM of 22,000 sq ft of cultivation for ALL Outdoor Phase 1 and CCAO operators.

CCAG strongly requests the cap be set to 22,000 sq ft for all Outdoor Permits and capped to 10,000 sq ft for Mixed Light and Indoor Permits.

4. Limit cultivation to a MAXIMUM of 22,000 sq ft per parcel

CCAG requests the recommendation to be a maximum of 22,000 sq ft for cultivation with the additional allowance of a Nursery permit for both Phase 1 and CCAO.

5. Limit the number of permits to (2) per person

Mendocino County currently allows for the mix and match of different cultivation styles for Phase 1 operators, as long as the plant canopy does not exceed 10,000 sq ft with the additional allowance of a nursery permit for up to 2 permits per person. CCAG believes the same logic should be applied in Phase 3 and a cap should be placed on how many permits someone should be allowed to have. There is no permit cap currently in the Board recommendations but one should be considered to avoid license stacking. We offer the suggestion that an eligible applicant can hold multiple licenses on a parcel but not to exceed the largest size of canopy allowance based on zoning and parcel size. With a cap of 10,000 sq ft maximum per parcel for Indoor and Mixed Light permits. This creates opportunities for applicants to mix and match different styles of cultivation as long as the cumulative canopy of each permit doesn't exceed the canopy cap per parcel. CCAG recommends the maximum allowance of (2) permits per person.

6. Allow a 6-month window for Phase 1 operators that need to transition to CCAO, to be eligible to apply first when CCAO goes into effect

Phase 1 operators should have the opportunity to reapply under the land use discretionary use permit pathway if they will unfortunately not be able to receive a State Annual License because of limitations to 10A.17's ministerial process. CCAG is requesting a 6-month window for only Phase 1 operators to submit an application under Phase 3, since many operators are currently attempting to comply with the requirements of the Appendix G #15168 checklist. The timeline for approval or denial by the County and State is unknown at this time. Applicants need time to see if they can pass CEQA compliance using the checklist before attempting an alternative pathway. For this reason we request that a special opening of the CCAO be exclusive for Phase 1 operators for a period of 6 months.

**7. Remove Section 22.18.030 (F) of the CCAO that states:
"No more than one exemption under paragraph (B), (C) or (D), may be used on any parcel"**

Personal recreational and medical use are two separate things and should be treated as such. Prop 64 allows every citizen the right to grow their own plant medicine and for recreational use. Some varieties of cannabis are suitable primarily for medicinal uses and cultivated with high CBD ratios, which are not as desirable for recreational use. We need to allow people to grow medically and recreationally and not require someone to pick one or the other since they are grown for different reasons. Many landowners have multiple people living on a property together, possibly married. What if one person needs cannabis for medical reasons and the other wants to enjoy cannabis recreationally? Since the requirement is per parcel and not per person this is another consideration for amending the BOS recommendation.

8. Amend Section 22.18.030 (G) (1) from 1,000 feet to 600 feet

It currently states that cannabis grown for personal medical or recreational use cannot be within one thousand (1,000) feet of a youth center, a school, or a park as defined herein. CCAG recommends that this setback be changed to 600 feet.

9. Remove Section 22.18.050 (B) (1) that requires a Major Use Permit and replace with an Administrative Permit for ALL Phase 1 operators that must transition to the CCAO process

Phase 1 operators should not be required to obtain a Major Use Permit if they have to utilize the Phase 3 approach to obtain a State Annual license. Currently a Cannabis Major Use Permit costs \$6,209.08. These applicants should be afforded the least expensive pathway especially given all the money that has already been spent to this date to become licensed. It makes no sense to require a specialty cottage 2500 sq ft operator to pay the same Major Use permit fee as someone that has never cultivated before and will be scaling up to a canopy size as large as 10% of acreage if approved. This seems to be a policy that was overlooked by the Board of Supervisors that was never fully discussed when the zoning table recommendations were drafted. CCAG recommends that instead an Administrative Permit apply to all Phase 1 operators.

10. Amend Section 22.18.070 (C) to state “mixed light activities must be covered up at night to not impact the night sky”

11. CCAO Appendix A zoning table should include the re-opening of the Accommodation Districts located in Laytonville, Covelo Core, Covelo Fairbanks, & Legget

This would create more opportunities for specialty cottage operators to come into the regulated market and would be limited to the defined areas of the Accommodation Districts. It should also be noted that these sites are capped at 2500 sq ft.

12. CCAG is in strong support of the MCA recommendations for the Facilities Ordinance in reference to Agenda Item 6a.

CCAG especially supports the following:

Section 20.243.040 (D) (7) (b)

CCAG supports MCA's recommendation to allow for (1) farm tour per day.

Section 20.243.040 (D) (8) (b)

CCAG supports the MCA recommendation to allow Farmers markets to occur in public places, so long as exit and entry points are secure and controlled.

Section 20.243.040 (D) Retailer/Dispensary

CCAG supports the MCA recommendation to remove the language stating *“On-site consumption shall not be permitted within any area that is considered a “building” as defined by Mendocino County Code 20.008.022(F)”*

As you can see detailed by our memo, the issues of expansion are complex and require a lot of consideration. We feel that it’s important to understand all of the concerns held not only by our organization, but also the valid concerns of other groups such as the Municipal Advisory Councils, Water Districts and Climate Action committee, just to name a few. **The decision to expand cannot be taken lightly.** As policy makers, we believe it’s important for you to understand our industry, how it functions, our origins and our future. **There must be consideration given to the complexity of the issues, community values, ecology, and economy.** Mendocino County can create a successful thriving market by giving a real chance to the 1,000+ small farms that have come forward to be regulated and have helped shape the industry to be what it is today by saying NO to hasty expansion.

Please consider all of the responses you have received and weigh it out with all of the considerations in place. **Make a decision that will be good for our community, economic viability and rooted in regenerative ecological practices that value land stewardship and protection of our precious natural limited resources.** Fires will continue to plague California since we have entered uncharted territory in our climate history. Drought may become more severe as time moves on and scarcity of water should be a concern for everyone. We must look at all things from a macro perspective, a holistic approach that recognizes we are all interconnected.

We know that this industry grows exponentially each year and more States are legalizing cannabis for both recreational and medical uses. Mendocino County has an incredible chance to play a constructive and visionary leadership role in shaping sustainable agricultural values. All eyes are on Mendocino County right now. We hold the third most cultivation licenses of any County in the State. Let’s send a message far and wide in support of a sustainable future that values our resources, our craft farmers and most importantly the ecology of this beautiful place we all call home.

Thank you for the opportunity to provide comment on these important agenda items.

Respectfully,



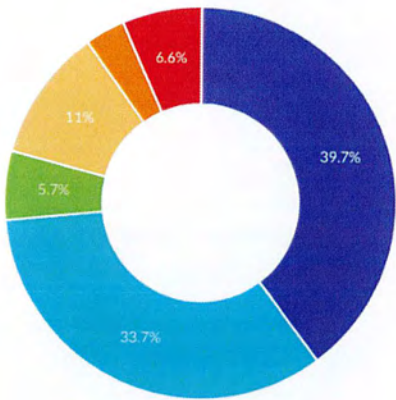
Monique Ramirez
for the Covelo Cannabis Advocacy Group

Please check all boxes that apply to you

Question Type: Multiple Choice

Required: Yes

Total Responses: 295



Choice	Total
I am a resident of Mendocino County and not directly involved with cannabis	133
I am a cultivator with a provisional/annual State license and/or County embossed receipt/permit	113
I am not a cultivator but wish to enter the industry when Phase 3 opens	19
I am a cultivator but not currently for the commercial market	37
I am a licensed distributor, retailer, processor or manufacturer	11
I am a consultant or offer other services to cannabis operators in Mendocino County	22

Unanswered
0

Answered
295

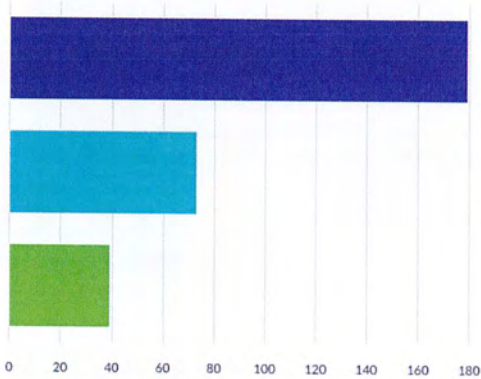
[See all answers >](#)

Do you support allowing Phase 3 cultivators in Range Land, Ag Land or Upland Residential to cultivate 10% of their parcel acreage for cannabis?(ex: 100 acre Range Land parcel would be allowed up to 10 acres of plant canopy with a Major Use Permit)

Question Type: Multiple Choice

Required: No

Total Responses: 291



Choice	Total
No	179
Yes	73
Other (please specify)	39

Unanswered
4

Answered
291

[See all answers >](#)

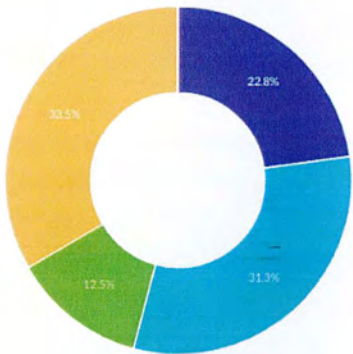
What maximum plant canopy cap would you prefer among the following?

Question Type: Multiple Choice

Required: No

Total Responses: 281

Q3 What maximum plant canopy cap would you prefer among the following?



Choice	Total
10% of parcel acreage	64
1 acre (43,560 sq ft)	88
22,000 sq ft	35
10,000 sq ft	94

Unanswered
14

Answered
281

[See all answers](#)

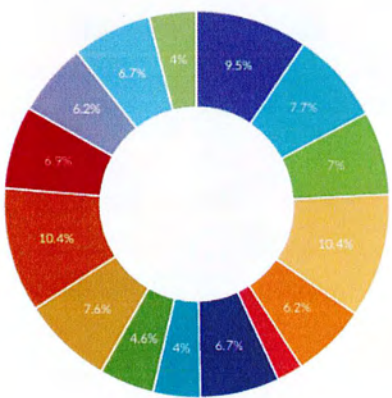
Do you support 1 acre = (43,560 sq ft) of cultivation in Mendocino County? If YES, what type of zoning and cultivation style should be allowed? (Check all that apply)

Question Type: Multiple Choice

Required: No

Total Responses: 287

Q4 Do you support 1 acre = (43,560 sq ft) of cultivation in Mendocino County? If YES, what type of zoning and cultivation style should be allowed? (Check all that apply)



No, I do not support 1 acre cultivation sites	129
Phase 1 Operators	105
Phase 3 Operators	95
Outdoor	142
Mixed Light	85
Indoor	30
Nurseries	91
Forest Land (FL)	54
Timber Production Zone (TPZ)	63
Range Land (RL)	103
Agriculture Land (AG)	142
Upland Residential (UR)	94

Unanswered
8

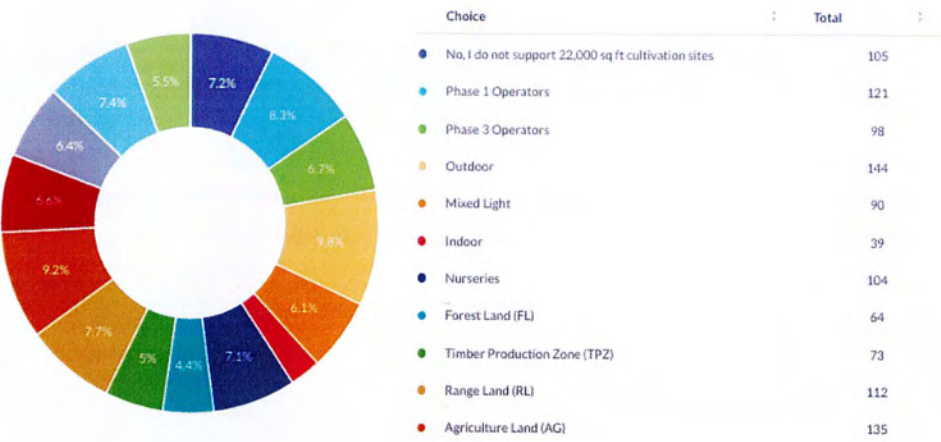
Answered
287

[See all answers](#)

Do you support 22,000 sq ft of cultivation in Mendocino County? If YES, what type of zoning and cultivation style should be allowed? (check all that apply)

Question Type: Multiple Choice
Required: No
Total Responses: 275

Q5 Do you support 22,000 sq ft of cultivation in Mendocino County? If YES, what type of zoning and cultivation style should be allowed? (check all that apply)
Multiple Choice

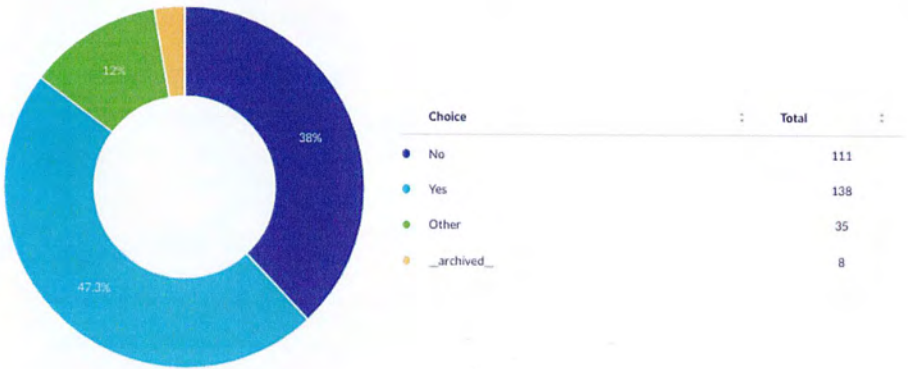


Unanswered 20
Answered 275
See all answers >

Would you support a 1-acre cap on plant canopy for Phase 3 until interstate commerce opens up?

Question Type: Multiple Choice
Required: No
Total Responses: 292

Q6 Would you support a 1-acre cap on plant canopy for Phase 3 until interstate commerce opens up?
Multiple Choice



Unanswered 3
Answered 292
See all answers >