

Angie Lane - Support of 6b

From: Ian Powell <iantpowell707@gmail.com>
To: <pbs@mendocinocounty.org>
Date: 3/18/2021 4:32 PM
Subject: Support of 6b

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Planning & Building Services

I am writing this letter in support of 6B.

Many other counties in the state of California are allowing acres of production. The price of cannabis is inevitably going to begin to drop because of the volume being produced throughout the state. Keeping cannabis production to such a small scale is putting the cultivators at risk of being priced out of the market because they simply will not be able to produce enough to pay all of the taxes, fees and keep up with their costs. On the other hand if we allow cultivators to scale up there will be more jobs available, more tax money injected into our local communities and overall more money being spent at local businesses.

The cannabis industry is heavily regulated by two environmental agencies the State Water Resource Control Board and Fish and Wildlife. All of the product that is enters the legal market must also be tested which includes a pesticide panel which is very strict. They test for 66 different pesticides, 21 of those pesticides are zero tolerance. I do not believe that there is an environment concern with expansion because of all of the regulations in place. What other industries are regulated as strictly on an environmental level?

Our local economy depends heavily on money coming in from the cannabis industry. If we do not allow significant expansion we are putting all of our local businesses at risk because many companies will begin to leave the area and relocate in counties that allow them to grow their businesses. If this happens we will not only lose out on the tax money that these companies would pay to be licensed in our county but the ancillary companies that depend on the cannabis industry will begin to suffer as well.

If cultivators are not able to scale their cannabis operations, Mendocino County is risking losing the last industry that we have available to us.

Ian Powell
President Mendocino Grasslands

350

Angie Lane - Agenda item 6B

From: russell silva <ressullsalvi@gmail.com>
To: <pbs@mendocinocounty.org>
Date: 3/18/2021 4:33 PM
Subject: Agenda item 6B

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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. Going forward into a %10 expansion is absolutely reckless. The citizens of Mendocino county have come forward with an overwhelming concern and disapproval. Mendocino County will do just fine with the napa model, and small craft organic farms. The tourism will expand from around the world just as Amsterdam has seen in years past. Being able to have tasting rooms is the key to a healthy county. That will fill the job needs. Restaurants will be busier then ever. Hotels will barely have any vacancies. Giving everything to 5 big companies that will extract all monies to their home counties doesn't help anyone. 95% of all food Farms on the planet are smaller than 5 Acres unfortunately the United States does conventional farming which is band around most of the world due to the damage it creates to the Earth. Organic farms are only 1% of all Farms and they have the highest point of sales. If we don't follow this niche we will be thrown into the mainstream where everybody is competing forcing our citizens to work twice as hard temperatures of product with half the price this does not make sense. Mendocino is not a brand or needing branding we have built a lifestyle known around the world over the last 30 to 40 years we are not a corporation we are a community and our community has spoken loud and clear.

Thank you for your time concerning this important agenda item.

Respectfully,
Russell L Silva

Angie Lane - Comments on Phase 3 for the March 19th, 2021 agenda

From: Mendocino Cannabis Resource <mendocinocannabisresource@gmail.com>
To: <pbs@mendocinocounty.org>
Date: 3/18/2021 4:37 PM
Subject: Comments on Phase 3 for the March 19th, 2021 agenda

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Greeting Planning Commission Members,

Planning & Building Services

I have two comments on Phase 3 on the March 19th, 2021 agenda.

Expansion

Expansion should be limited to one acre until January 1, 2023,
 and should only increase if the state regulations establish the Type 5 license.

The state will possibly create a new category of Type 5 "Large" cultivation license but not until 2023.

I feel it is important for Mendocino County to follow & honor the will of the voters in 2016 when Prop 64 passed, and that was to give the existing small legacy cultivators a chance to get established before we allow larger cultivation licenses.

The state has stated it will only approve the Type 5 'Large' license if a need or shortage is identified in the supply chain.

The state also includes that a person or company cannot hold some of the other license types & have a Type 5 license.

A Type 5, Type 5A, or Type 5B licensee shall not be eligible to apply for or hold a Type 8=Testing, Type 11 = Distribution, or Type 12 = Transporter license.

If Mendocino County decides to increase cultivation limits to 10%

how would this work with the state's license since a cultivator has to have dual licenses to be permitted?

Will there be other license type restrictions like the state has with the Type 5 license?

Will there be a marketing assessment to determine there is a need in the supply chain?

(Text from the Medicinal and Adult-Use Cannabis Regulation and Safety Act (MAUCRSA))

(1) Type 5, or "outdoor," means for outdoor cultivation using no artificial lighting greater than one acre, inclusive, of total canopy size on one premises.(2) Type 5A, or "indoor," means for indoor cultivation using exclusively artificial lighting greater than 22,000 square feet, inclusive, of total canopy size on one premises.(3) Type 5B, or "mixed-light," means for cultivation using a combination of natural and supplemental artificial lighting at a maximum threshold to be determined by the licensing authority, greater than 22,000 square feet, inclusive, of total canopy size on one premises.(c) No Type 5, Type 5A, or Type 5B cultivation licenses may be issued before January 1, 2023.(d) Commencing on January 1, 2023, a Type 5, Type 5A, or Type 5B licensee may apply for and hold a Type 6 or Type 7 license and apply for and hold a Type 10 license. A Type 5, Type 5A, or Type 5B licensee shall not be eligible to apply for or hold a Type 8, Type 11, or Type 12 license.

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My second comment.

Reopening the Accommodation/Overlay Zones in Phase 3

<https://www.mendocinocounty.org/business/cannabis-permits-and-licenses>

Please include re-opening the four (4) already approved & identified 'Accommodation/Overlay Zones' in Phase 3.

1. This program has already been approved by the BOS & Planning so it should be easy to do.
2. Most who live in these areas represent our County's small cannabis legacy growers.
3. Some would qualify for the Low Income status needed to apply for the Equity Grants that are available.
4. Mendocino County already has around a quarter million invested in establishing this program but only made the option available for a few months.

I would rather the county focus on supporting small farms instead of focusing on large grows that are not even allowed by the state.

Thank you for your time & consideration.

Karen Byars,

Mendocino Cannabis Resource Events

[707-223-4367](tel:707-223-4367)

Angie Lane - Phase 3

From: draftshire <draftshire@yahoo.com>
To: <pbs@mendocinocounty.org>
Date: 3/18/2021 4:40 PM
Subject: Phase 3

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Planning & Building Services

3/18/2021

Dear PBS

I am writing you today as a Phase 1 cannabis farmer located on land zoned FL. I have held a county cultivation permit and I hold a state provisional permit. I have taken out and have been issued all the permits you have required for buildings and grading. I have never cut a tree for cannabis cultivation. I do have a managed timber harvest plan and have not harvested since owning the property. I am in good standing with all agencies. I am reaching out to you to please allow all zones allowed in phase 1 and 2 to be able to move forward. Even if expansion isn't an option for me due to configuration of my property please make expansion inclusive of all zones that have been previously approved. Also please take note that forest land farms are the most environmentally sound form of farming because we can produce our own imputes. We do not have to import ancient peat bog material mined in Alaska or ship coco coir from across the world. Our forests will provide us with the organic matter needed. Living soil cultivation uses a symbiotic relationship between the mycorrhizae and the sand, silt and clay to offer sufficient Phosphorus and potassium for most of the plants needs. Manure from grazing stock used for fire suppression is also used for soil organic matter and Nitrogen. The goal is for farms to operate just like a forest that has no needs for out side imputes. The farther you get from the forest they more imputes you must import. We have the ability to cultivate cannabis in a non extractive form that works with the natural environment. Please take into consideration that forest farming can be the most efficient form of farming because it works with nature not the use of petroleum derived fertilizers. My symbiotic relationship with the soil doesn't end there. In 2017 I sent certified letter to all my neighbors before I applied to the county stating my intent. I worked on coming to an agreement with our road association to increase fees to licenced farmers to cover any extra road traffic. Just like I care for my environment I too care for my community. I am not alone please support the homestead farmers that help make up part of our community.

Kind Regards

David King

Sent from my U.S.Cellular© Smartphone

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Angie Lane - Agenda item 6B

From: John Goraj <john_goraj@yahoo.com>
To: "pbs@mendocinocounty.org" <pbs@mendocinocounty.org>
Date: 3/18/2021 4:43 PM
Subject: Agenda item 6B

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Planning & Building Services

The BOS (Board of Supervisors) voted to hire the current cannabis manager, a planning department employee.

Newly Proposed changes Have to be ok'd by the planning commission.

The cannabis program manager planning dept. reports directly to the BOS

Result=A rubber stamp operation run by the BOS

Why haven't years old existing permit applications been approved?

The BOS and Planning Department do not/cannot enforce the current regulations... they use workarounds to circumvent these current regulations to who's benefit? Big cannabis and irresponsible potential legal growers. Set the regulatory bar too low and there will be dire consequences. County residents are affected by the light and noise from cannabis farms as the environment suffers. The future of our counties way of life is at stake.

The BOS stage 3 regulations would change not only the prohibition on new operations on 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, protections against tree removal, a generator phase out timeline Protections against light pollution. But it doesn't take into consideration how much more our scarce resources will be taxed to exhaustion. Who will pay in the end?, ordinary citizens. We will all pay for this irresponsible legislation.

The BOS and the Cannabis industry currently set the playing field... not environmentalists, ordinary citizens.

Why doesn't the BOS control the current massive influx of these weakly regulated industrial cannabis operations? They set the regulatory bar so low it invites disaster. Where does all this cannabis money go? County infrastructure? Here in Potter Valley there has been no substantial road work in my 20+ years as a resident. Our infrastructure is third world.

Is there a criminal background check in place for permit applicants or land owners?

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Is the county DA involved with any investigations pertaining to the issuing or regulations of the permits?

This would help to stem the influx of organized crime and cartel operations in Mendocino Co.

“Under the proposed Phase 3 ordinance, all permits would be discretionary through a land use permit process” what does this mean? Bigger is better? Is the BOS in charge of this discretion? Of course as long as the Planning Department and the BOS have the power of the rubber stamp their will shall be done.

Tyranny... cruel, unreasonable, or arbitrary use of power or control.

Angie Lane - Letter for PC Hearing 3/19/21

From: Meghann Sommer <meghannsommer@gmail.com>
To: <pbs@mendocinocounty.org>
Date: 3/18/2021 4:45 PM
Subject: Letter for PC Hearing 3/19/21

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Planning & Building Services

To the Planning Commission:

Thank you for taking the time to listen to each member of the Mendocino community in regards to their thoughts on the Phase 3 Ordinance.

I am writing in support of both the 6a and 6b agenda items.

This ordinance is for farmers in Mendocino County who want to build a viable business and truly and fully operate in the legal market in California- and looking to the near future, nationally. Opening up the possibility for an economically viable amount of cultivation space has nothing to do with corporations or chemical laden farming practices.

The people asking for these changes aren't outside interests in suits with no connection to the land- We're neighbors. We all live and eat and play in the same places and have the same vested interests in Mendocino County. It is not an us vs. them scenario, nor is it an act of greed to want to try and make a viable living in the legal cannabis market. Regardless of what happens locally, the market is changing and we need to change with it, or we could risk losing the single largest source of revenue within our county.

Mendocino County has an established history of promoting and applying progressive agricultural techniques. We have more biodynamic vineyards than anywhere else in the country. I truly believe that Mendocino County can be an example of what sustainable cannabis cultivation and production practices look like. It's already a large part of our cultural awareness as an agricultural community and I don't think this responsibility is lost on anyone.

Legal cannabis is a very very regulated industry, the images of plastic piping in waterways and trash piles don't translate over to what a licensed grow looks like. The more latitude we are given as an industry the more progress we can make towards developing a cultivation standard that fits our neighborhoods and our needs. I truly hope that the black market does not hold us back at this moment from moving forward with Phase 3 and cultivation expansion.

Thank you,
Meghann Sommer
Ukiah

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Angie Lane - Agenda Item 6B

From: Gloria Decater <Livepower@livepower.org>
To: <pbs@mendocinocounty.org>, <bos@mendocinocounty.org>
Date: 3/18/2021 4:46 PM
Subject: Agenda Item 6B

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Planning & Building Services

Dear Planning Commission Members and Supervisors,

Please do not approve or promote the "Commercial Cannabis Activity Land Use Ordinance" (Agenda Item 6B).

We do not need to turn over our extensive land and water resources to unregulated cannabis production, which could seriously degrade our social, environmental, climatic and living environment, all for short term and probably largely exported monetary gain. As an organic/biodynamic food producing farmer in Covelo for the past 45 years, I have seen the extractive timber industry come and go leaving weakened and damaged watersheds and fire prone environments behind. More recently we experience our community inundated with trash filled cannabis grows which have driven land prices far beyond what can be viably paid for from sustainable food or livestock agriculture thus excluding development of beginning or expanding food farmers and agricultural and nature related tourism. Considering we are in an extended drought, we also have grave concern about the excessive use of water by this industry and its future on our watershed and agricultural viability.

The proposed 10% of a property being used for cannabis only leads to invasion by potential growers who do not have a commitment to our community. These growers can then tie up larger pieces of agricultural, range land and related residential land for the sake of using 10% for cannabis. My understanding of industrial zoning near residential or urban areas is that the industrial use is confined to the industrial zone and not interspersed in the residential or urban areas. Industrial cannabis should have its own specific area that can be regulated and monitored for water use and solid waste and fertilizer impacts instead of being dispersed ad lib throughout all agricultural land in the whole community. County government should help protect our long term residents' community and quality of life by blocking dispersal development in water sensitive and wild fire prone areas. Please keep the protections in our current ordinance to confine industrial cannabis to a limited and controllable area or zone, thus protecting and conserving our food bearing land, water, resources, health, and natural environment.

Thank you for your attention to this matter

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Sincerely,

Stephen Decater

Gloria Decater

Live Power Community Farm

25451 East Lane

Covelo, CA 95428

Angie Lane - Agenda Item 6B 03/19/2021

From: Joanne Cavallari <joanne.cavallari@yahoo.com>
To: <pbs@mendocinocounty.org>, <bos@mendocinocounty.org>
Date: 3/18/2021 4:48 PM
Subject: Agenda Item 6B 03/19/2021
Cc: <glazegoddess@gmail.com>

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MAR 19 2021

Planning & Building Services

This letter is to express my strong opposition to the proposed commercial Cannabis Activity Land Use Ordinance, agenda item 6B, that will be discussed by the Planning Commission on March 19, 2021.

I have been a resident of Mendocino County for over 30 years. Due to the climate change crisis, we are consistently receiving well below what used to be our "normal" amount of rainfall. To open up rangeland to potentially hundreds of acres of cannabis cultivation would be a drain on our water supply and have serious adverse impacts on the environment that would not be sustainable. To eliminate the environmental protections we currently have in place would have serious consequences.

I am also very concerned about the increase in violent crime that goes along with large commercial cannabis grows. People in our county are being killed because of disputes related to cannabis cultivation. Our Sheriff's Department is already stretched too thin. This proposal would create an increased burden on them and poses a threat to the health and safety of the entire Mendocino County community.

It is unfair to bring forward a proposal that has such a huge impact on our lives when, due to COVID restrictions, concerned citizens are not allowed to attend public meetings and speak before the Commissioners and Supervisors in person. Many people in the county, myself included, do not have access to reliable internet and are unable to attend these meetings remotely.

I urge you to reject the proposed ordinance and give careful consideration to what is at stake.

Thank you.

Joanne Cavallari
2111 Poppy Lane
Brooktrails

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Angie Lane - Agenda item 6b

From: Amanda Scatena <amandascatena@yahoo.com>
To: <bos@mendocinocounty.org>, <pbs@mendocinocounty.org>
Date: 3/18/2021 4:49 PM
Subject: Agenda item 6b

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Planning & Building Services

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.
- 6) Law states no cultivation of cannabis within 1000 ft of schools and children's play grounds like parks or recreational areas.
- 7) The illegal jumping of trash on property's and roadways are increasing with increased trespassing on private property's

I have been a resident of Potter Valley for many years and I am raising my children 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 and school. 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

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Amanda scatena

Angie Lane - Commercial Cannabis Land Activity Ordinance - 6b

From: Chantal Simonpietri <chantal.csconsulting@gmail.com>
To: <pbs@mendocinocounty.org>
Date: 3/18/2021 4:51 PM
Subject: Commercial Cannabis Land Activity Ordinance - 6b

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 Planning & Building Services

Hello Honorable Planning Commission Members,

Thank you for taking the time to read through the abundance of public comments related to the CCAO.

This comment is specific to item 6b - OA_2021-0002 to be heard on 3/19/21.

The perspective that frames my comments is that of an independent environmental compliance consultant specializing in water, sensitive species and habitat protection, and land use as they relate to the cannabis industry. My educational background is in geology, hydrology, law, and environmental conflict resolution. I have worked professionally in these fields, in Mendocino County, since 2017. My previous employment was with the Real Goods Solar Living Institute where I administered the education program with an emphasis on sustainable living, renewable energy, resource depletion responses, and community building. I've been a County resident living in and around Ukiah and Boonville since 2004.

In my local career I have worked with over 300 cultivator individuals, witnessed the wide breadth of who Mendocino County is made of, and seen the nooks and crannies of pretty much every watershed. There is no stereotypical cannabis cultivator or landowner. The community is diverse, well-intentioned, and hard-working. Any policy position taken from a position of generalization should be suspect.

Below are my comments related to item 6b:

1. Yes! A discretionary land use permitting mechanism for commercial cannabis cultivation is necessary and appropriate for this transitional era for cannabis.

2. No! on 10% of acreage - Too much and too soon. I do not support the proposed allowance of 10% of acreage depending on zoning type. I do work with clients who are eager to expand or permit an as-of-yet unpermitted parcel up to the maximum allowed. And, in theory increasing the cap is reasonable. Doing so via this third phase is inappropriate and irresponsible given the phase 1 quagmire. Fix the problems for phase 1 folks first, then later

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roll out a more expansive acreage allowance. Do this with determination and focus, with a planning department that is properly staffed and trained, and we can soon move on to the increased footprint options with greater discretionary review.

3. Yes! Priority processing for phase 1 applicants is equitable and reasonable. The existing pool of phase 1 applicants, whether with permits or application receipts, must be given a viable path to a local permit, before new applicants and applications are received or reviewed by the County.

4. YES!! Sustainability Guidelines - Being on the threshold of the next phase of cannabis permitting is a great opportunity for our local decision-making bodies to craft the County's future cultural and ecological landscape for fifty to 100 years from now. Use this permitting mechanism crafting moment to write in wise, mandatory guidelines that value sustenance of our local resources not depletion. I encourage the planning commission to recommend that the Board of Supervisors adopt guidelines for cultivation and cannabis operations that require gradual reduction of ecological footprint, encourage and reward regenerative agriculture, and promote social equality.

5. Yes! Clear, stringent, demonstration of water availability - I strongly encourage the Planning Commission to recommend to County staff the creation of water use guidelines that can be adopted as binding best management practices for all water source types. New phase 3 applicants should demonstrate sufficient water available to meet irrigation needs of the proposed cultivation at its largest proposed stage of buildout. Rainwater collection and storage deserves a streamlined permitting path and tax benefit. Taxation should factor in water usage with mandatory enforcement of metering.

6. Meadowlands ecosystem protection - I support strong, clear guidance from the County informed by science, with enforced best management practices that ensure new development and expansion of current sites proceed in a way that is protective of grasslands. Given the existing restrictions on where cultivation can and can't go (ie. prohibition on removal of oak woodland species, including most commercial tree species, plus stream and wetland setbacks to protect water quality and riparian habitat) and the solar exposure required for cultivation, cannabis operations have shifted to the open space meadow ecosystems. This can be met by requiring all new applicants to develop their potential site informed by a biological resources assessment with measures to allow for mitigation where there is potential impact, or prohibition if the impact is too severe. Mitigation should occur on the same parcel where possible, or in the form of a "banking" mechanism that operators can pay fees toward based on degree of impact, that the "bank" then utilizes to fund mechanisms that protect and sustain undisturbed sensitive habitat in the same watershed.

7. Match the Permit to the Scope of Project Proposed - I encourage the selection of permit type match the project scope. This means that lesser discretionary review be required when the project scope is smaller (size measurement being square feet of cultivation for cultivation operations). Larger footprint project proposals should require greater discretionary review.

8. Craft Cultivation Permit - Give the little farms a break! Those that have been working so hard to be legal should be given all the support possible in the form of a streamlined permitting and review process, and lower fees. Farms of 10k SF and under need all barriers to success removed. This encourages local economic diversity, strength, character, and pride. This is what true Mendocino Cannabis is and has been.

9. GO MCA! - I support all of the recommendations offered by MCA in their Memo to the Commission and encourage and invite widespread participation in their community-driven policy conversations.

--

*Be well and choose joy,
Chantal Simonpietri, JD*

CS Consulting

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e: chantal.csconsulting@gmail.com

m: P.O. Box 1150, Ukiah, CA 95482

Angie Lane - Agenda item 6B

From: John Goraj <john_goraj@yahoo.com>
To: "bos@mendocinocounty.org" <bos@mendocinocounty.org>
Date: 3/18/2021 4:45 PM
Subject: Agenda item 6B

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 Planning & Building Services

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Tyranny... cruel, unreasonable, or arbitrary use of power or control.

Angie Lane - Opposition to Agenda Item 6B

From: "Sandra Wake" <swake@willitsonline.com>
To: <pbs@mendocinocounty.org>
Date: 3/18/2021 4:54 PM
Subject: Opposition to Agenda Item 6B

I am adamantly opposed to Agenda Item 6B

Sandra Wake
Round Valley resident since 2001
Mendocino County resident since 1981

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MAR 19 2021
Planning & Building Services

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March 16, 2021

Mendocino County Planning Commission
501 Low Gap Rd.
Ukiah Ca. 95482

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MAR 19 2021

Planning & Building Services

Re: March 19th Planning Commission Meeting items: 6a & 6b

Dear Commissioners,

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

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From: a hilkey <ahilkey@hotmail.com>
To: "pbs@mendocinocounty.org" <pbs@mendocinocounty.org>
Date: 3/18/2021 4:54 PM
Subject: Cannabis Phase III Agenda Item 6B

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MAR 19 2021
Planning & Building Services

I am contacting you regarding The county's proposed Commercial Cannabis Activity Land Use Ordinance. Agendaltem 6B

As a Willits Resident. I am very concerned regarding the phase III allowances for comm Cannabis production.

I am concerned in regards to Water Equity for all willits residents.

During The 2020 growing season. Many residential wells within the Little Lake Valley experienced low or no water availability for several months of the summer and fall or 2020.

Placing a hardship on residents in their efforts to simply provide their families drinking,laundry and even water to sanitize their own hands.

The commercial cannabis industry certainly seemed to have plenty of water as it appeared that the commercial cannabis industry was using rainbird sprinklers 24/7

For weeks on end to water blackberry vines adjacent to their cannabis crops. My assumption was this was meant to promote growth to act as a view blocker as well as to reduce Fire danger. At the expense of neighbors wells.

I believe that the expansion of Commercial Cannabis Cultivation in the Willits valley will

Exacerbate the lack of water availability for other Willits Residents that simply would like to have water to drink and shower etc.

Well Water use restrictions must be included in any permitted Cannabis Cultivation

To ensure water equity for all Willits residents.

Andy Hilkey
Willits Resident
707-841-7937
ahilkey@Hotmail.com

Sent from my iPad

364

We are in total support that the BOS has tasked staff with crafting a new Phase 3 cultivation ordinance. We are a manufacturing company, as part of our business plan we were thrilled with the ability to control the strain selection, quality and quantity needed to sustain us thru the year. Unfortunately, we process all of the biomass grown here within three months and resort to outsourcing for the balance of the year to enable us to meet the demand.

We have been growing since 2017 with the hopes and understanding that this very ordinance would be developed in the near future at some point. In the ordinance's current state it is unsustainable as a grower. To continue with the limited 10,000 SF will ultimately lead to a relocation to one of the surrounding counties that allows larger grows for survival.

RECEIVED
MAR 19 2021

Building Services

365

Mendocino County Planning Commission
Ukiah, CA 95482
pbs@mendocinocounty.org

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MAR 19 2021

Planning & Building Services

RE: Support of Phase 3

Planning Commission,

I'm writing in support of the Phase 3 Cannabis Cultivation Ordinance. My support is twofold as follows:

Cannabis Facilities Ordinance:

I'm a partner at the Thatcher Hotel in Hopland. One key objective of our business plan is to create opportunities to expand tourism in Hopland and the region. Although we realize the new ordinance is not fully developed in terms of our ability to incorporate cannabis consumption we see it as an opening to be developed. We feel the eventual ability to include cannabis consumption on premises will further our mission to bring more guests to Mendocino to celebrate all it has to offer.

Commercial Cannabis Land Use Development Ordinance:

My wife and I own a 95-acre ranch in Ukiah Rancheria zoned AG 40. Although about 60 acres of the property is on steep hillsides the remaining land is being used for farming grapes and our homesite. We currently have 10 acres of grapes planted and plan to introduce 3 or 4 more acres of new varieties. The approval of Phase 3 would allow us to finally have the opportunity to diversify our crop with cannabis and help support the overall farming enterprise. We farm the grapes organically and have begun to introduce fruit trees, edible and herb gardens, etc. With an approved use permit we feel our land would align with local and state cannabis policy.

Sincerely,



Mark Rogero and Joanne Chan

Owners, Open Hand Ranch

OPEN HAND RANCH 2200 MCNAB RANCH ROAD, UKIAH, 95482

366

Angie Lane - Agenda item 6b for March 19 - no 10% expansion!

From: Charles Sargenti <charlessargenti@gmail.com>
To: <pbs@mendocinocounty.org>
Date: 3/18/2021 5:00 PM
Subject: Agenda item 6b for March 19 - no 10% expansion!

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Dear Commissioners:

I am writing to express my support for the Mendocino Cannabis Association's (MCA) position on Phase 3 cannabis cultivation. Allowing the expansion of cannabis cultivation up to 10% of a parcel size would, in my opinion, be a grave error. The small family farms are the backbone of the county rural communities. For decades they have been the mainstay of economic viability in their communities. Legalization has also brought new standards for environmental stewardship which all now must adhere to, making small cannabis farmers formally responsible for environmental well-being. The county has dragged its feet on several fronts. Both finishing up the permits for small farmers, which has been going on almost four years now, and the necessary enforcement, against criminal elements by the sheriff, and code enforcement by Planning and Building code enforcement. Now is not the time to welcome large corporate players into the county. The county needs to get its act together first and fulfill their promises to these farmers. Large corporate players would both threaten the economic viability of the small farmer and further encumber county staff in carrying out their obligations and responsibilities to the approximately 1100 farmers already left behind.

MCA also has recommended several critical changes to the ordinance as currently drafted aside from the 10% expansion issue. I hope the Commission forwards these recommendations to the Board of Supervisors.

Thank you,

Charles Sargenti
Covelo, CA

367

From: Sarah Graham <coveloSeedandScion@gmail.com>
To: <pbs@mendocinocounty.org>
Date: 3/18/2021 5:02 PM
Subject: Phase 3 (Item 6b)

RECEIVED
MAR 19 2021
Planning & Building Services

March 18, 2021

Re: Planning Commission Agenda 6b for meeting March 19th

Dear Honorable Planning Commission Members,

My name is Sarah Graham, I am an owner/partner of Covelo Seed and Scion Collective. This item is very important to me for many reasons...

I am also owner of Lilipad Land Development LLC. My husband and I started back in 2009. I was born 1980 and raised in Mendocino county. My family is very large and rooted here. My Great Grandfather petitioned to get power ran out to Westport. My Grandfather owned Longvale for years and ran Longvale Country Store and Gas Station. My Aunt ran store across the creek, after the new bridge was put in at the end of HWY 162. I disagree with the 10% Expansion without a Cap. For the future of Mendocino, I urge you to please stand up for us!

This letter is to show support for the memo put forth by the Mendocino Cannabis Association (MCA)

I especially want to emphasize the following items:

*6b

Thank you for time and consideration of these important matters to our community.

Sincerely,

Sarah Graham

368

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

From: James Feenan
To: Angie Lane
Date: 3/19/2021 7:41 AM
Subject: Fwd: CCAG memo for 3-19-2021 PC meeting
Attachments: CCAGPC3.19.2021memopages1-13.pdf; CCAG Survey Resultspages14-16.pdf

James F. Feenan

Commission Services Supervisor
Mendocino County Planning & Building Services
860 North Bush Street, Ukiah CA 95482
My Direct Line: [\(707\) 234-6664](tel:(707)234-6664)
Main Line: [\(707\) 234-6650](tel:(707)234-6650)
Fax: [\(707\) 463-5709](tel:(707)463-5709)
feenanj@mendocinocounty.org
<http://www.mendocinocounty.org/government/PBS>

RECEIVED
MAR 19 2021
Planning & Building Services

>>> PBS PBS 3/18/2021 3:14 PM >>>

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/

>>> 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.

369

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



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.

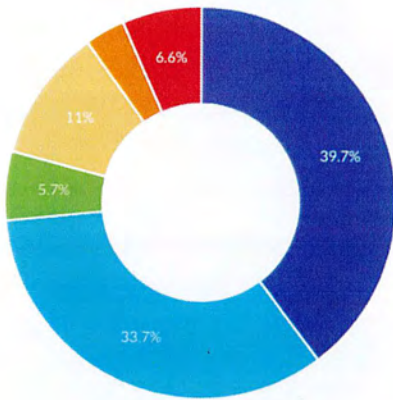
Respectfully,



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

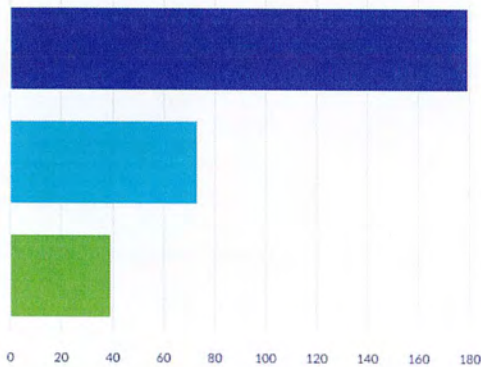
Unanswered
0

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 >](#)

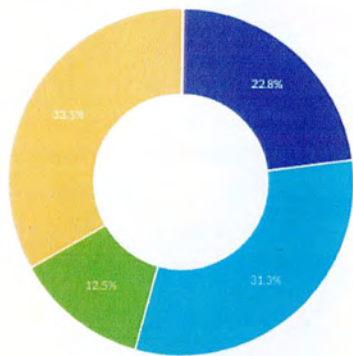
What maximum plant canopy cap would you prefer among the following?

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 >

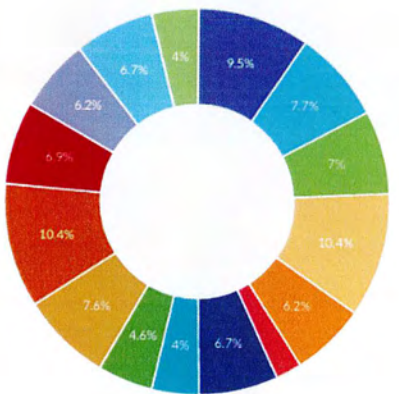
Do you support 1 acre = (43,560 sq ft) of cultivation in Mendocino County? If YES, what type of zoning and cultivation style should be allowed? (Check all that apply)

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

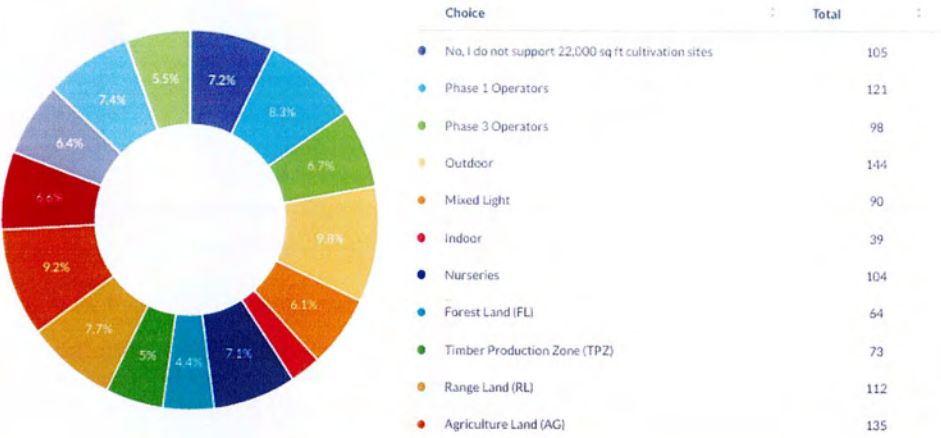
Required: No

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

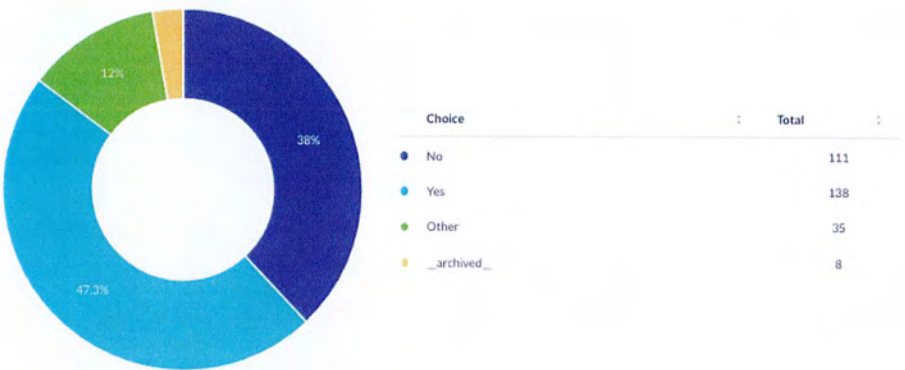
Required: No

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 >](#)

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

From: Covelo Cannabis Advocacy <covelocannabisgroup@gmail.com>
To: Michael Katz <Michael@mendocannabis.com>
Date: 3/18/2021 12:24 PM
Subject: Fwd: CCAG memo for 3-19-2021 PC meeting
Attachments: CCAGPC3.19.2021memopages1-13.pdf; CCAG Survey Resultspages14-16.pdf

----- Forwarded message -----

From: **Covelo Cannabis Advocacy** <covelocannabisgroup@gmail.com>
Date: Thu, Mar 18, 2021 at 12:21 PM
Subject: CCAG memo for 3-19-2021 PC meeting
To: <pbs@mendocinocounty.org>

RECEIVED
MAR 19 2021
Planning & Building Services

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

370

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

371



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.

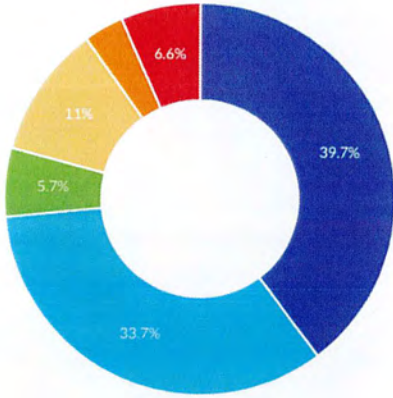
Respectfully,

A handwritten signature in blue ink, reading "Monique Ramirez". The signature is written in a cursive, flowing style.

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

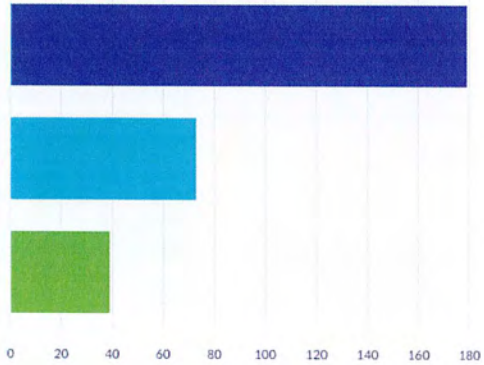
Unanswered
0

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 >](#)

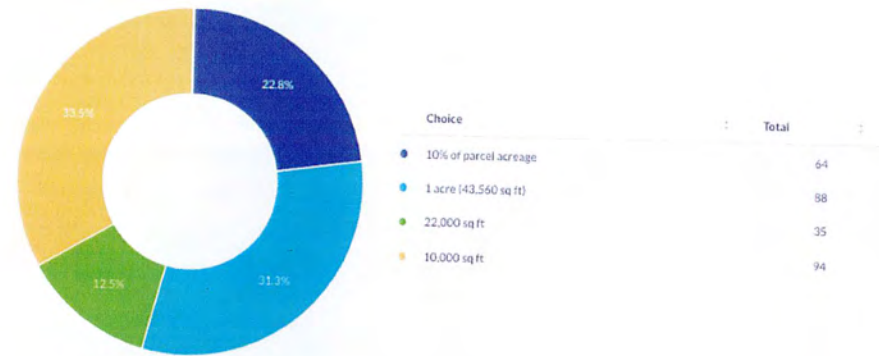
What maximum plant canopy cap would you prefer among the following?

Question Type: Multiple Choice

Required: No

Total Responses: 281

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



Unanswered: 14, Answered: 281, See all answers

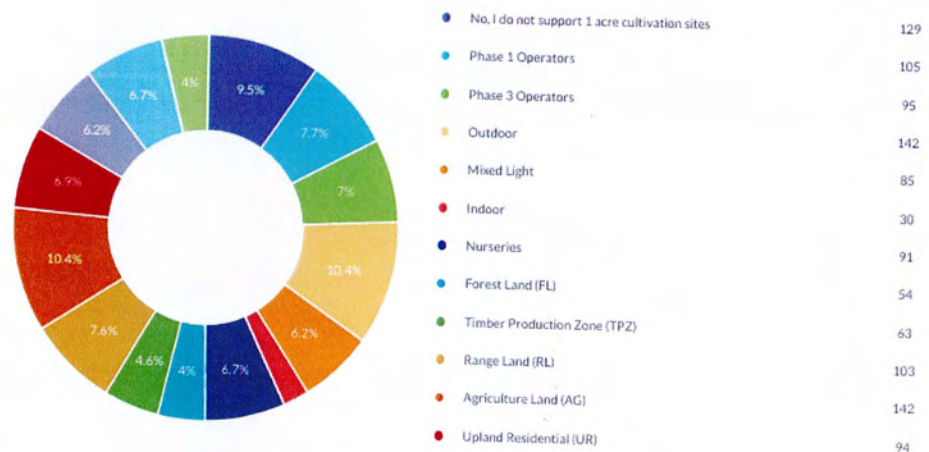
Do you support 1 acre = (43,560 sq ft) of cultivation in Mendocino County? If YES, what type of zoning and cultivation style should be allowed? (Check all that apply)

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)
Multiple Choice



Unanswered: 8, Answered: 287, See all answers

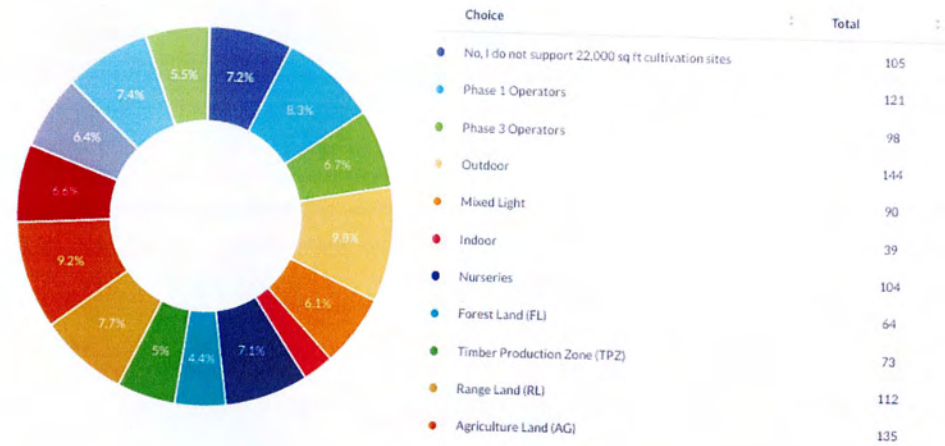
Do you support 22,000 sq ft of cultivation in Mendocino County? If YES, what type of zoning and cultivation style should be allowed? (check all that apply)

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 >](#)

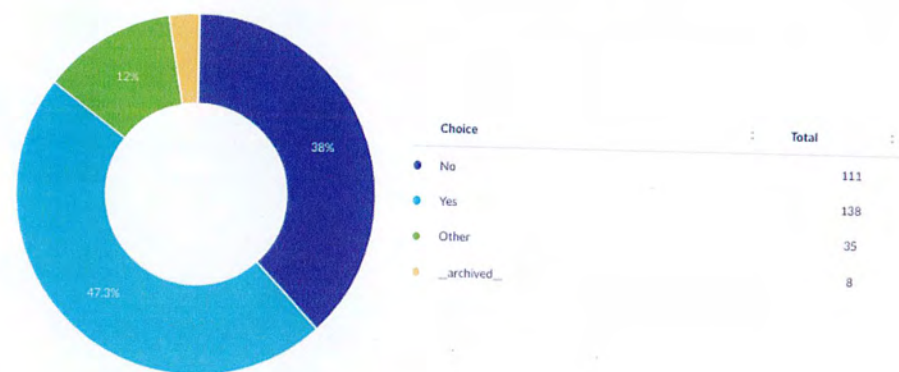
Would you support a 1-acre cap on plant canopy for Phase 3 until interstate commerce opens up?

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 >](#)

Angie Lane - AGENDA ITEM 6B

From: marisela de santa anna <mdsa1955@gmail.com>
To: <pbs@mendocinocounty.org>, <bos@mendocinocounty.org>
Date: 3/18/2021 12:38 PM
Subject: AGENDA ITEM 6B
Attachments: cannibis letter.docx

Dear Planning Commissioners and Board of Supervisors,
please read my attached letter in regards to item 6B on the agenda for Friday, Thanks for your
regards,
Marisela de Santa Anna

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3/15/21

To the County Planning Commission, and the Board of Supervisors

I am writing this letter in response to agenda item 6B that will be voted upon on Friday March 20th without much public input., the "Commercial Cannabis Activity Land Use Ordinance." Three and ½ years ago the County Supervisors passed the existing Cannabis Cultivation Ordinance with the help of LACO Environmental. At that time the public was allowed to give lots of input of which some was incorporated into the new Cannabis Ordinance. It seemingly had protections for the smaller growers and the environment.

This new version has been put forth as a solution to the debacle of the present ordinance, due to the lack of follow through, enforcement of regulations, and timely permit processing. This is not a solution but an even bigger debacle in the making. How is it helpful to this situation to call in more and bigger Cannabis growers? By opening the rangeland option, lifting the 10,000 square foot cap on cultivation site size, removing any limits on the number of permits per parcel, and finally allowing up to 10% of a 10-acre or larger parcel in the Agricultural, Upland Residential, and Rangeland zones to be converted to cannabis cultivation, this situation we are in now will definitely get much worse. It seems that the Planning Department can't keep up with environmental, neighborhood, and other impacts at present how can they possibly take on bigger and more Cannabis grows? I am not against the farming of Cannabis but I am against the way our county has decided to ignore the impact of this on the integrity of our communities and the environment. This new ordinance will open up more issues that will impact Mendocino County profoundly and not in a positive way. We need to deal with the permits that have been filed and growers who have not followed regulations at this point first before we move on to bigger and more complicated Cannabis farming with yet newer regulations. The idea that more and bigger will help things when we can't keep up with what is happening does not work. The original ordinance may have been flawed but it has not had a really work because the agencies have not been able to keep up. As with all land use permitting all the environmental impacts must be considered and regulated especially in this age of drought and wildfire issues. Please consider all of these impacts carefully when deciding which way to go with the Cannabis ordinance.

Sincerely,

Marisela de Santa Anna

1800 Muir Mill Road

Willits, CA 95490

Angie Lane - Phase 3 comments for 03.19.21 Planning Commission Meeting

From: Sarah Hake <sarah@countervailinc.com>
To: <pbs@mendocinocounty.org>
Date: 3/18/2021 12:42 PM
Subject: Phase 3 comments for 03.19.21 Planning Commission Meeting
Attachments: 03.19.21 Phase 3 comments.pdf

Hello,
Please see attached comments.

Thank you,

--
Sarah Hake, Esq., COO
Countervail Inc.
376 E. Gobbi St, Ste B
Ukiah, CA 95482
sarah@countervailinc.com
Ph: [707-621-5178](tel:707-621-5178)
Fax: [707-875-7191](tel:707-875-7191)

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313



376 E. Gobbi St, Ste B
Ukiah, CA 95482
707-621-5178

March 18, 2021

RE: Agenda Item 6b.

TO: Members of the Planning Commission

We are writing today to express our support of the increase in cultivation size on certain parcels to 10% of the parcel. We represent many cultivators and have concern for the ongoing health of their businesses. Environmental safeguards are important. The Phase 3 application process allows for review of a property to ensure that there will not be environmental infractions, and that the property will be able to sustain the proposed project without negative impacts. The state's regulations that cultivators are required to adhere to are far more strenuous environmentally speaking than those for other agricultural businesses.

Having the ability to combine the cultivation onto a single parcel will save driving, which benefits the environment and saves small businesses time and money.

Supporting small farmers is important. One of the easiest ways to support small businesses is to allow them to decrease their overheadⁱ. For small businesses, lower overhead costs can lead to better profit margins. A cultivator will make more profit on 20,000 sq ft on a single parcel than it will having it on two parcels as they will not have to pay duplicate costs such as waterboard fees, LSAA fees, property taxes, insurance, etc.

When you have AG parcels in Redwood Valley that are 25 acres in size, 19.19 of which are vineyards, an RL parcel in Hopland that's 296 acres, of which 38 acres are devoted to vineyards, and 160 acre parcel in Hopland with 22 acres devoted to both olives and vineyards, limiting cannabis to 10% of the property (or even less) creates a disparity in how these products are treating. This is antithetical to normalizing the production of cannabis. Concern is often brought up regarding use of water. However, New Frontier Data's recent report on cannabis water usageⁱⁱ shows the water usage of cannabis in California to be far below corn for grain or seed, wheat for grain or seed, pastureland, vegetables, rice and orchards. The report states that the cannabis industry's limited use of water makes it the most water-economical crop among the state's top revenue crops.

If the concern is about water and not the cannabis itself, why are we not limiting these other crops to 10% of the property?

Allowing cultivators to cultivate up to 10% of their property where they can show they are able to do so in an environmentally sound, secure way will go to helping small farmers ensure the success of their business, create more interest for cultivators to stay in county, bring more money to the county, and will actually aid in cutting back on certain environmental issues.

We strongly support keeping this as an option under Phase 3 regulations.

Sarah Hake, Esq.
sarah@countervailinc.com
SBN:325722

ⁱ <https://www.altitudeadvisory.com.au/resources/business-improvement/top-7-strategies-to-improve-profit/>

ⁱⁱ https://newfrontierdata.com/cannabis-insights/legal-cannabis-cultivations-footprint-sinks-common-assumptions-about-comparative-water-use/?link_id=9&can_id=35daec52d5a62ae92062f72f45203c81&source=email-news-action-alerts-from-ca-norml&email_referrer=email_1105810&email_subject=cannabis-uses-far-less-water-than-other-ca-crops-more-news-action-alerts-from-ca-norml

Angie Lane - cannabis expansion

From: vashti o'donnell <vashtirose@hotmail.com>
To: "pbs@mendocinocounty.org" <pbs@mendocinocounty.org>
Date: 3/18/2021 12:50 PM
Subject: cannabis expansion

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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

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Angie Lane - Fwd: Letter to Planning Commission and BOS re OA_2021-0002 (Cannabis Cultivation) (Phase 3)

From: Helen Menasian <hmenasian@icloud.com>
To: <pbs@mendocinocounty.org>
Date: 3/18/2021 12:52 PM
Subject: Fwd: Letter to Planning Commission and BOS re OA_2021-0002 (Cannabis Cultivation) (Phase 3)
Attachments: Letter to Mendo PLANNING COM re cannabis reg.change_3_17_21.docx; Letter to Planning Com and BOS re cannabis reg change_3_17_21.pdf

I sent the attached letter regarding cannabis regulation and it doesn't seem to be posted for the March 19 planning commission meeting, so I am sending it again.(also copied below without my address).

March 17, 2021

From:
Helen Magruder Menasian

To: Mendocino County Planning Commission
Mendocino County Board of Supervisors

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MAR 19 2021
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Regarding: OA_2021-0002 (Cannabis Cultivation) (Phase 3)
 A proposal to move to a Phase 3 Land Use Based Permit Process for Mendocino Cannabis Cultivation, allow cultivation on up to 10% of a qualified parcel, and allow the cultivation of cannabis on rangeland in Mendocino County

Dear Commissioners, BOS Members and Staff,

It is my understanding that the Board of Supervisors is moving toward terminating the existing Cannabis Cultivation Ordinance and replacing it with a Land Use Permit process that would be "more manageable" and result in an increase in large scale cannabis production on rangeland. I strongly oppose opening up rangeland and I am very concerned about the move to increase the number of acres allowed for cannabis production at this time.
 I am from a ranching family that has lived in Mendocino County for over 100 years. I

understand the need and pressures to adopt county policies that support agricultural endeavors that might provide income for local farmers and broaden the County's economic base. Regulating the cultivation of cannabis in our county is challenging, but the Mendocino County General Plan and our Cannabis Cultivation Ordinance (and any changes to it) should act a guide for such decisions. Large scale production of cannabis in rangeland is not compatible with the goals and policies set forth in the Resource Management Element of our General Plan and, at this point, is explicitly prohibited in the Phase one Cannabis Cultivation Ordinance.

The Mendocino County General Plan goals and policies promote land uses and development practices that facilitate healthy watershed ecosystems and protect and enhance the long-term

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sustainability of our water resources. Opening up additional rangeland for cannabis production will have a major impact on the availability of water for existing land use and for the sustainability of our already heavily impacted ecosystems. This is in direct conflict with General Plan Policy RM – 14 which states that existing water uses shall have priority over new water uses, and Policy RM-17 that states that no development shall be allowed by the county beyond proof of the capability of the available water supply. Water in Mendocino County is already over allocated and this has impacted the health of our streams and rivers for salmon and steelhead and other wildlife. Adding additional water demand higher up in our watersheds will only increase this problem.

General Plan Policies RM-24, 25, and 26 protect the county's natural landscapes by restricting conversion and fragmentation of timberland, oak woodlands, farmlands, and other natural environments; prevent fragmentation and loss of our oak woodlands, forests, and wild lands and preserve the economic and ecological values and benefits; AND protect, use and manage the county's farmlands, forests, water, air, soils, energy, and other natural resources in an environmentally sound and sustainable manner. Many large ranches in Mendocino County are composed of smaller legal parcels. Permitting widespread cannabis cultivation on rangeland parcels would provide an economic incentive to breakup these ranches and other large landholdings and lead to the very fragmentation and loss of ecological diversity and sustainability that our general plan works to prevent.

While the proposed PHASE THREE LAND USE PERMIT PROCESS for the regulation of cannabis production is well intentioned, there are many issues that need to be worked out before it will achieve its stated goal of protecting the natural resources of our county while allowing for the expansion of legal cannabis production. This may require an EIR before expanding cannabis production and certainly requires increasing staffing at both the planning and enforcement levels.

Your time and effort to create, adopt, and enforce responsible cannabis cultivation guidelines is greatly appreciated.

Sincerely,
Helen Magruder Menasian

Helen Menasian
hmenasian@icloud.com

Begin forwarded message:

From: Helen Menasian <hmenasian@icloud.com>
Subject: Letter to Planning Commission and BOS
Date: March 17, 2021 at 11:54:15 AM PDT
To: pbs@mendocinocounty.org

Please find attached comments regarding changes to cannabis regulation that I would like to submit to the Mendocino County Planning Commission (for March 19th meeting) and to the Mendocino County Board of Supervisors.

Helen Menasian
hmenasian@icloud.com