

Dear Commissioners and Supervisors,

I am writing to ask you to oppose this new Ordinance —essentially a short-sighted attempt to cash in on the cannabis boom at the expense of the the environment; the integrity of our communities; the will of the people; and the livelihoods of small growers trying to survive on a reputation of environmental sensitivity and economic sustainability.

I would like to address these issues.

- 1) The proposed ordinance eliminates hard-won protections for small growers and the environment which are part of the existing Cannabis Cultivation Ordinance.
- 2) The proposed ordinance opens the door for massive expansion of cannabis cultivation in the county and thus creates powerful incentives for large-scale commercial and residential development throughout the county's remote, rural, environmentally sensitive landscape. This will add to the multitude of known and unknown impacts already affecting the county's human and natural environments.
- 3) The county does not have the budget, the staff or the track record to responsibly invite new cannabis operations at this time. The Board's primary responsibility now is to follow through on its obligations to current permittees, and to the taxpayers; to show that the county is capable of completing permit applications, and eliminating and cleaning up the hundreds of non-compliant, illegal operations.
- 4) The proposed ordinance, though promulgated as a solution to the present debacle, fails to remedy the spectacular failure of a citizen-driven complaint system of enforcement. It neither proposes or funds an alternative enforcement plan while blindly inviting more and larger operations into every remote, hidden, hard-to-access corner of the county.
- 5) The proposed ordinance wholly ignores the recommendations of the Mendocino County Climate Action Committee regarding the implications of land use development and the need to meet greenhouse gas reduction and carbon sequestration goals. It ignores the committee's recommendation NOT to open the rangeland zones to new commercial development. The proposed ordinance actually creates incentives for dispersed residential and remote rural commercial development which in turn would increase vehicle miles travelled for every aspect of new residential and commercial operations, and increase demands on fire fighters, among other things. In contrast, the existing ordinance prohibits new commercial cannabis development in the more remote undeveloped wildfire-prone areas of the county and instead directs new cannabis businesses to locate in zones already impacted by development, or where water and public services, including fire protection, are more readily available.
- 6) The proposed new ordinance abandons the hard-won protections of the existing ordinance that would apply to both existing and new growers, specifically: no new cultivation in the rangeland zone; 10,000 sq. ft. caps on cultivation size; a limit of two permits per parcel; tree removal prohibitions; a generator use phase-out timeline; prohibition on any light pollution leaving a property; a detailed and specific watershed analysis for new operations, and others.

7) The new ordinance was never discussed openly and broadly in public forums around the county but, rather, was sprung on the public, and even on some members of the Board of Supervisors, over the course of a weekend! It is a disgrace and a failure of our democratic process.

8) In contrast, the existing ordinance, IF ENFORCED, supports the vision shared by a majority of county residents - small scale, high quality, outdoor-grown cannabis, and NOT just another boom-and-bust exploitive industry that leaves its wreckage across the county.

In summary, this new proposed ordinance is irresponsible and wasteful of taxpayer money. It fails to remedy existing environmental abuses and invites a wave of new impacts to the environment and to communities. At the very least this proposed ordinance should undergo a rigorous Environmental Impact Report (EIR) by the county. I recommend that the Board of Supervisors reject the proposed ordinance and enforce the existing Ordinance.

Sincerely,

Phaedra Craig

from an original letter by Ellen Drell, for the Willits Environmental Center