

April 12, 2021

**From:**

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**To: Mendocino County Board of Supervisors**

RE: : [OA 2021-0002 \(Cannabis Cultivation - Chapter 22.18\)](#)

April 19, 2021 Board of Supervisors Public Hearing

**Regarding:** 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 BOS Members and Staff,

It is my understanding that the Board of Supervisors is considering 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 as 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 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 and certainly requires increased 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