



Mendocino County Fish & Game Commission

860 North Bush Street, Ukiah, CA 95482

<https://www.mendocinocounty.org/government/planning-building-services/fish-game>

April 13, 2021

Dear Members of the Board,

This letter from the Mendocino County Fish and Game Commission is being respectfully submitted to provide recommendations concerning potential impacts to fish and game (wildlife) from the proposed expansion of cannabis production under Phase Three, of up to ten percent (10%) of qualified zoning designations.

The recommendations of the Mendocino County Fish and Game Commission are:

1. To address cumulative impacts of expansion of up to 10% per parcel, with a maximum cap of 1 to 5 acres, the Fish & Game Commission recommends each watershed must be evaluated cumulatively with the following requirements:
 - a. Road development needs to be avoided or limited. If unavoidable, new roads must conform to best management practices to prevent sediment delivery into salmon spawning streams;
 - b. High fencing, any fencing higher than four feet, needs to be bird and wildlife "friendly". Migratory song bird migration and wildlife migration corridors must be identified and mitigated.
 - c. To protect sensitive regional water supplies throughout the county and existing wildlife habitat, water development needs to be onsite rather than trucked in and should meet CDFW and Regional Water Board standards for cannabis permits. Water for wildlife in rangeland is critical; any disruption of natural watering areas or spawning areas must be identified and mitigated.
 - d. Code enforcement of all CDFW and SWRB laws need to be enforced along with any county ordinances.

Mendocino County Fish and Game Commissioners

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2. Extensive expansion of cannabis development needs to be avoided until impacts can be measured through a qualified scientific monitoring process:
 - a. The 10% proposed expansion, which, in this county, could be thousands of acres, needs to be reconsidered for rangeland. Parcels in other zoning areas with sensitive habitats and listed species could be negatively impacted.
 - b. The Fish and Game Commission recommends a moratorium on expansion cannabis production of up to 10% on rangeland parcels until cumulative impacts to fish and wildlife can be adequately assessed and recommendations made for measured expansion.
3. County of Mendocino proposed Use Permit needs to have a separate CEQA review for proposed 10% expansion:
 - a. The Fish and Game commission recommends the County prepare a CEQA Environmental Impact Report (EIR) to ensure that environmental impacts to fish and wildlife are considered before unchecked expansion results in unintended consequences.
 - b. A CEQA document must also consider the advent of a “boom-bust cycle” where cannabis farms may become abandoned should the cannabis market crash. Currently, abandoned “grows” are being remediated through public funding—many of those sites have been found to be a hazard to both human health and wildlife. Hazardous waste generated from abandoned cannabis farms is an on-going problem and must be addressed in the permitting process. Liability insurance must be required for each permit.

Thank you for considering our recommendations and please know that we are available to provide guidance and input on matters concerning fish and wildlife in Mendocino County.

Sincerely,

Redhawk Pallesen

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Vice Chair
Mendocino County Fish & Game Commission

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