

March 17, 2021

Mendocino Board of Supervisors  
Mendocino Planning Department

Input on Agenda Item 6B: Commercial Cannabis Activity Land Use

Although currently residing in Ukiah, we have lived and worked in Round Valley, off and on, for 45 years and have witnessed first hand the environmental/social damage the cannabis industry has done to our property and the fabric of Round Valley community. We have witnessed stream pollution, hazardous chemical use, generator noise, light pollution, non-permitted well drilling, road erosion caused by leaking water trucks, destruction of woodlands, and widespread dumping of plastic waste. Moreover, we have endured the indiscriminate discharge of weapons day and night- at times fearing for our families safety. Outlaw cultivators are running wild and seem motivated only by greed and short term profit.

For these reasons, and with cultivation already out of control (as witnessed by Sheriff Kendall), it is apparent that permitting more acreage for cultivation borders on foolishness-like adding fuel to the fire. If you pass an ordinance that supports agribusiness and not rural communities, the citizens and landscape of Mendocino will undoubtedly be harmed.

Specific reasons are laid out in the following bullets:

- 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 on range lands and creates powerful incentives for large-scale commercial and residential development throughout the county's remote, rural,

and 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 and track record to responsibly invite new cannabis operations. The Board's primary responsibility is to current permit-tees 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 and hazardous operations.

4) The proposed ordinance, suggested as a solution to the present debacle, fails to remedy the failure of a citizen-driven complaint system of enforcement. It neither proposes nor funds an alternative enforcement plan; blindly inviting more and larger operations into every remote and 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 range land 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 traveled 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 range land 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 exploitative 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.***

**We strongly recommend that the Board of Supervisors reject the proposal and enforce the existing Ordinance.**

Sincerely,

Dan and Charlene Holbrook  
Ukiah, CA 9548