

April 14, 2021

Mendocino County Board of Supervisors
501 Low Gap Rd.
Ukiah Ca. 956482

Re: April 19th BOS meeting, agenda item: April 19th Cannabis Land Use Ordinance

Dear Board of Supervisors,

I am writing in opposition to the proposed Cannabis Expansion Ordinance.

There are significant consequences to moving forward with the ordinance as it is. During the April 12, 2021 Board meeting, CDFW made a presentation. In that presentation they addressed the negative effects of further cannabis expansion into the rangeland, such as habitat loss, roads etc. They also addressed water, as we are in a severe drought. In speaking about water they quoted from the County's General Plan " Policy RM-6 " Promote sustainable management and conservation of the county's water resources". In considering Cannabis ordinances the County must adhere to the General Plan by protecting the water sources for the communities at large. If the County bypasses CEQA by adopting this ordinance and performs review on a case by case basis, the cumulative effects of this expansion will not be seen. CDFW said that the County should keep development to areas of existing development without sensitive species or habitats, located outside of impaired watersheds, or perform a full CEQA review and or perform an EIR to address cumulative impacts. They also said that any ordinance should be clearly defined by "Standards and Conditions". The current draft ordinance is deficient in Standards and Conditions and leaves too much up to County Planning. The people of this County deserve to have this ordinance clearly spelled out.

It is my opinion that this is such an important issue for the future of our County that we should have a full EIR before any expansion is talked about. Water is now a major issue that must be considered. The County agreed, under the current cannabis ordinance, to not allow further expansion in the rangeland zones. The rangeland prohibition "about face" needs to be addressed.

Next, we have enforcement of the illegal grows and the grows that are in the permit pipeline. Right now in Round Valley the night sky is lit up by hoop houses all over the valley and the adjacent hills. Water is being trucked to illegal grows in a huge radius to the valley. Wells are going dry in parts of the valley and crime is out of control. It seems some supervisors are trying to separate the enforcement issue from the expansion ordinance, saying they are different issues. What we have is a totally out of control system with no enforcement. I will not get behind any expansion until the County can show that it can deal with enforcement, shut down the illegal grows, and restore the safety of our communities. Sheriff Kendall said at the 4/12 meeting that we are in a Public Safety Crisis.

Recommendations:

- A proposed expansion of this magnitude needs a full EIR and should go before the voters of this County.
- Enforcement must be well funded and performed. The County must work towards establishing public trust, in this matter.
- Public Safety must be restored.
- If you move forward with a use permit system, take out the proposed expansion, write detailed Standards and Conditions, and provide a path for Phase 1 & 2 applicants to be able to acquire their licenses.

Thank you for your consideration,

Ron Stark
Covelo/Albion