

To The Board of Supervisors:

The current method of licensing cannabis cultivation has not been successful, so the County is now proposing a discretionary use permit.

The MWPC (Mendocino Women's Political Coalition) believes that impact to the environment should be of top concern when deciding how to go forward. While we are in favor of regulating cannabis and creating a pathway for growers to be licensed, we believe there are some additional actions the county can take to further protect the environment.

1. No land should be cleared for the purposes of new cannabis cultivation. Any new cultivation should take place on land that has been cleared for agricultural use for at least 5 years prior. The land use process will determine the suitability of each parcel for the proposed project, but clearing should not be allowed.

2. The trucking of water to any cannabis cultivation site should be prohibited. Water rights and sources should be subject to the highest scrutiny during the land use application process and licensed farms should be required to track and report water usage during the growing cycle. The County needs to explain what they plan to do, because the last ordinance required proof of water sources and limited efforts to scrutinize water availability were made.

3. The County must invest in the Planning and Building Department. If the county continues without properly trained staff to vet applications for consistent CEQA compliance, public frustration over the environmental impacts of cannabis cultivation will mount. Without adequately trained staff, the Planning Commissioners will be put into the difficult role of having to make determinations related to CEQA on a project-by-project level. The inconsistent application of CEQA requirements for new cannabis

cultivation permits will continue. Investing in the Planning and Building Department will meet other planning needs in our community, such as updating the General Plan. Rather than rely on outside consultants, the County should develop the ability to understand and administer CEQA in-house for cannabis and other development proposals. An experienced resource professional familiar with wetlands, waters, habitats, and wildlife impacts is a needed addition to support planners and enforcement staff.

4. The County is proposing to allow indoor, mixed-light, greenhouse permits for residential, agricultural, and rangeland areas. These types of developments drain resources, generate waste, and are a blight to residential areas. The County should restrict unpopular high-impact indoor permits, to avoid public complaints, appeals of Planning Commission decisions, and disputes among neighbors.

I understand that cannabis is not the only industry that has an impact on our environment. Ideally, all agricultural industries in Mendocino should adhere to practices that enhance, rather than harm our environment.

Sincerely,

Janice Lombardi

MWPC Membership Chair