

Covelo Community Services District

23950 Grange Street, Covelo, California 95428 (707) 983-6888 / <https://ccsd.roundvalley.org/>

BOARD OF DIRECTORS

Paul Filler, Joe Gauder, Sherrie Lee

March 15, 2021

Mendocino County Planning Commission
860 N. Bush St.
Ukiah, CA 95482

Re: Opposition to expansion of cannabis cultivation to 10% of parcel size within the Round Valley Area.

Dear Commissioners,

On behalf of the Covelo Community Services District (CCSD) the Board of Directors are sending this letter to strongly oppose the proposed expansion of cannabis cultivation to ten percent (10%) of parcel size for Agricultural, Rangeland, and Upland Residential zonings. Our oppositions are multi-fold including concerns for public, water, and land health.

We believe that streamlining the current cannabis permitting process is the priority to encourage greater compliance before any expansions. Further, any cannabis expansion is best developed by those working in the permitting departments, not the Supervisors. The information from the permitting Director, its departments, and the Sheriff are to inform the Supervisors as to the best timing, scale, and details of expanding cannabis cultivation.

Our community is plagued with unprecedented criminal activity on a daily basis. This activity is notably related to the proliferation of cannabis cultivation in its current forms. To allow increased cultivation further jeopardizes the health and safety of the valley's residents. Our Sheriff's department is currently unable to effectively maintain the safety needs of the valley and to add an additional burden on them is simply unconscionable.

CCSD currently has a moratorium on new service connections to any developments due to unprecedented levels of Biological Oxygen/Chemical Demands (BOD) in our influent. Our Board, staff, and the public have been

working to address the causes related to this moratorium. Through water testing and their analyses, we have concluded the most likely source of this BOD is from cannabis processing. Allowing cultivation expansions would further impact our ability to safely treat wastewater and foster the much-needed increase in housing and business development in Covelo.

We invite you to tour our valley to witness firsthand the aforementioned issues related to cannabis cultivation. There is an unending amount of illegally dumped trash and at a scale not ever witness before. The land here is at further risk of increased, severe, environmental damage with the proposed expansion of cannabis cultivation.

Finally, a largely overlooked issue with the proposed expansion is the lack of any environmental review or oversight of any kind. The proposal to expand an already resource taxing industry in areas such as our where current drought conditions appear to be limiting the groundwater recharge is irresponsible. It is impossible to adhere to the due diligence sworn to those in public service in this matter without requiring and completing an Environmental Impact Report before any decision is made to this proposal. Such a report would need to include at a minimum: geomorphological models as well as longitudinal monitoring studies of groundwater capacities and limits. By requiring such studies there's greater assurance that all the residents of Round Valley will continue to have adequate access to the water below their homes, businesses, and land.

Please note that each of these noted, serious concerns are echoed by other local public agencies and members of the public.

Thank you for your consideration,



Joe Gauder, Board Chair, Covelo Community Service District