

Board of Directors
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Round Valley County Water District



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March 15, 2021

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

Re: Concerns about the expansion of cannabis cultivation to 10% of a parcel size within Round Valley and surrounding watershed and potential adverse impact on both quantity and quality of water for existing users.

Dear Commissioners,

We are writing to express our concern regarding the proposed Commercial Cannabis Activity Land Use Development Ordinance. The Round Valley County Water District is concerned that the proposed increase in cannabis cultivation on up to ten percent of the parcel area, on agricultural and rangeland could deplete the aquifer and result in wells for existing users going dry.

In the last few years, Round Valley has seen a dramatic increase in cannabis cultivation, which has brought an enormous influx of new people and dramatic increases in water use. The water requirements for much of the cultivation are supported by an immense unregulated well water pumping and delivery businesses the significant impacts of which have been neither monitored nor ameliorated.

We believe that permitting a dramatic increase in cultivation may have detrimental effects on the water in Round Valley. Most of the Valley, as well as the hills that feed its streams and replenish its aquifer, are designated as range or agricultural land. Allowing expansion of cannabis cultivation to ten percent of this area would permit huge growth in an already booming and largely unregulated industry. Given the intensive water demands of cannabis during the time of year when the aquifer is at its lowest will most likely result in a decline in the availability of domestic water for many who live in Round Valley.

We are also concerned about chemicals used in the cultivation and processing of cannabis as well as sanitation issues that may be prevalent near the grows. The risk to groundwater and surface water needs to be evaluated and appropriately mitigated

The uncertainty of aquifer recharge during winter months because of climate change and reductions in rainfall is a potentially serious issue that must be addressed.

As elected officials, we strive to preserve and protect the water quality and quantity in Round Valley. We believe that the cumulative impacts of the proposed policy change have not been adequately evaluated. It is likely that the proposed ordinance will adversely affect the valley's aquifer and existing domestic water use. A piecemeal approach to environmental review, relying on impact assessments at individual cultivation sites will fail to adequately identify and address the many issues concerning the Round Valley aquifer. Therefore, we request the county conduct a comprehensive environmental impact report, including a detailed study of likely effects on Round Valley water, before adopting the proposed ordinance for the expansion of cannabis cultivation.

Please contact us if you have any questions. We are here to help.

Sincerely,

A handwritten signature in black ink, reading "Denis L. Moore". The signature is fluid and cursive, with the first name "Denis" and last name "Moore" clearly legible.

Denis L. Moore, Chairman
Round Valley County Water District