

Mendocino County Board of Supervisors
501 Low Gap Road
Ukiah, CA 95482

Re: 4/19/21 Agenda Item 3b: Cultivation Ordinance (CCAO)

Honorable Members of the Board,

I am writing to express my concern with the proposed allowance of 10% of total parcel size cannabis expansion and to ask that expansion be limited to 1 acre per parcel until cumulative effects of environmental impact can be addressed.

While there is extensive agency policy on water and watershed impacts with regard to cannabis, the reality is that the State Water Resources Control Board and Department of Fish and Wildlife are struggling to cope with the enormity of managing our regional ecosystems and can not provide comprehensive oversight.

Each agency has a limited scope and resources. Fish and Wildlife are trying to address the problem by limiting the amount of water one is allowed to withdraw, as water conservation is out of their jurisdiction. The Waterboard has jurisdiction over water conservation but does not seem to have adequate staff to do anything except collect fees. As a result, they fail to respond to processing requests from program enrollees in a timely matter, if at all. They only interact with a farm when a violation is called, and yet, our farmers still struggle under the fees and reporting requirements, while reports probably stack up on desks, unread.

Cumulative impacts of cannabis farming on water resources are not understood. Cumulative impacts of groundwater withdrawals are not monitored, regulated, or clearly addressed in the new policy. SIGMA will only cover a tiny portion of the County and the Aquatic Baseflow Method, as described in the Water Board Staff Report on Cannabis Policy, has never been applied to my knowledge. While the cumulative impacts of surface water withdrawals are generally well studied, there is a failure of understanding of what is actually happening on the ground with regard to surface water withdrawals on legal farms. For a sustainable water future we need water metering and a cumulative approach to environmental oversight.

I am not advocating for more regulation, I am advocating for better regulation. An example would be the Watershed-wide Site Management Plans that the waterboard had in their original North Coast order. That made sense.

Our culture of slow growth in Mendocino County is an important representation of our moral and ethical approach to development that is in line with our environmental ethics. While I believe that cannabis should be treated like any other agricultural endeavor, and thus I understand people's hesitancy to restrict cannabis farms in ways that other agriculture has not

been limited, every policy has a potential to have a specific, region wide impact, and that must be taken into consideration. In order to insure that we pass healthy watersheds and abundant resources and opportunities to our children we must consider the broad spectrum of impacts our activities have on our natural resources.

I suggest only allowing a small expansion, a maximum of one acre, and a focus on collaborating with state and other local agencies to improve our cannabis policies prior to greater expansion, reducing red tape, and looking at the cumulative effects of cannabis in tandem with other agricultural industries in Mendocino County.

Thank you for your consideration,

Anna Birkás