

Round Valley Area Municipal Advisory Council

PO Box 372 Covelo, CA 95428

"Serving the People of the Greater Round Valley Area"

April 16, 2021

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

Re: Addendum to the January 25th, 2021 letter (attached).

Dear Supervisors,

The RVAMAC voted on March 3rd to send a follow up letters to the Planning Commission and the Board of Supervisors to show our support for the Laytonville MAC on their resolution also in opposition of the expansion of cannabis cultivation up to 10% of acreage in AG, UR, and RL zoning districts.

In addition, we also want to highlight that since our original letter was submitted to the Board of Supervisors, other agencies within the RVAMAC District have expressed opposition to the expansion of cannabis cultivation up to 10% of acreage in some zoning districts. The Round Valley County Water District expressed concerns that expansion with a piecemeal approach to environmental analysis may result adverse impacts to the valley's aquifer and existing domestic water users. The Covelo Community Services District has also expressed concerns that allowing expansion could negatively impact their ability to safely treat wastewater. The sewer district is already under a moratorium and there are concerns that cannabis processing within the district may be part of the reason for their high BOD levels, preventing them from allowing more sewer hookups for much needed economic and housing development in the community.

With the heightened community concerns raised by multiple agencies, we would like to request that the County assure that the environmental impacts are assessed in an EIR, addressing the concerns listed by the RVAMAC, LMAC, Round Valley County Water District and Covelo Community Services, District, prior to consideration of any expansion of cannabis cultivation. We therefore reiterate our unanimous consensus of opposition to expansion of cannabis cultivation up to 10% of acreage at this time.

Thank you for your thoughtful consideration,

Jessica Stull-Otto



Presiding Officer

Round Valley Area Municipal Advisory Council

COUNCIL MEMBERS

★
Presiding Officer

Jessica Stull-Otto

★
*Assistant Presiding
Officer*

Lew Chichester

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Treasurer
Dane Downing

★
Secretary/Alternate
Charles Sargenti

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Council Member
Kathy Britton

★
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James Russ

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Laura Betts

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Kathleen Willits

*The views expressed
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Round Valley Area Municipal Advisory Council

PO Box 372 Covelo, CA 95428

"Serving the People of the Greater Round Valley Area"

January 25, 2021

Mendocino County Board Of Supervisors

501 Low Gap Road

Ukiah, CA 95482

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

Honorable Supervisors,

The Round Valley Municipal Advisory Council is unanimously opposed to the expansion of cannabis cultivation up to 10% of parcel, including in Ag, Rangeland, and Upland Residential zoning districts. The following concerns have been identified by the community.

Planning staff is already overburdened and unable to keep up with the work load required to manage the permitting process for those who have already applied. Expanding cultivation prior to getting caught up with issuing the permits to current applicants would only add to their burden and seems inappropriate at this time.

Law enforcement is already unable to keep up with the increased number of cannabis violations and the number of robberies, traffic accidents, murders, car jackings, and kidnappings are also increasing.

Water resources are already negatively impacted by the existing cultivation within the District and would be exacerbated if cultivation were allowed to increase. Impacts already being seen within the community include the draw down of wells in localized areas near cultivation sites, siphoning of and pollution of the Eel River and it's tributaries, and unregulated water delivery businesses that fall outside the scope of any kind of monitoring for impacts to wells, rivers, or streams. Increasing allowable cultivation would only add to existing water resource concerns felt within the community.

Large cultivation sites are already bringing huge numbers of transient workers into our community. These transient works have no place to live and so, create unhealthy encampments. Additionally, the town's sewer district is already at capacity and currently under moratorium for expansion,

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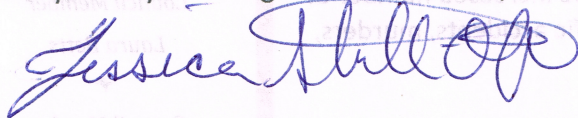
so the development of more affordable housing is not possible in the near term to meet any increased housing needs that would be needed to meet increased labor force, if cannabis cultivation were to be expanded in the area.

In addition to the environmental and community impacts above, it's important to also note Mendocino County's goal of protecting small legacy cultivators. There are many benefits to the existence of small and cottage level industries especially in predominantly rural areas like our county. These growers make up a significant fraction of the local community, most of their dollars flow back into the community, and the operations are, excepting egregious unregulated operators, consistent with the character of the county. Large corporate grows are the antithesis of this. Although it is much more challenging to permit and oversee a multitude of small growers, as opposed to a few large corporate players, this is what the county promised with the original ordinance creating the cannabis program. The intent of honoring and protecting small legacy cultivators should be upheld.

Regarding the question of equity, Prop 64 promised an initial phase where corporate players would be discouraged, and small legacy growers were to be given a chance to get established under the new legal paradigm, until 2023, by limiting the maximum canopy size to one acre. Additionally, CDFA limited the association of small farmers to form co-ops to no more than 4 acres of total canopy among the members. This meant that small farmers could maximally compete as a bloc with 4 acres of production while corporate player's production was limited only by the willingness of county authorities, thus expansion may give an unfair advantage to larger corporate entities and undermine the objects of Mendocino County to protect the small legacy cultivators within the community. And, as noted above, there are still many small legacy cultivators who are still waiting permit approval through the County. Opening the door to larger cultivators while many small cultivators are still awaiting their permits increases these equity concerns.

As you can see with the issues above, expansion of cannabis cultivation is not in the best interest of the Round Valley Area community. Therefore, the Round Valley Area Municipal Advisory Council opposes the proposal to allow expansion of cannabis cultivation to up to 10% of parcel size.

Thank you for your thoughtful consideration,



Jessica Stull-Otto
Presiding Officer

Round Valley Area Municipal Advisory Council