



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

May 11, 2021

Re: Item 5c for 05/11/2021 - Discussion and Possible Action Including Acceptance of Presentation and Direction to Staff Regarding Implementation and Execution of Enhanced Cannabis Enforcement Plan and Streamlined Process to Align all Parties, Including Code Enforcement, the Cannabis Program, the Mendocino County Sheriff's Office, and County Counsel (Sponsor: Planning and Building Services)

Honorable Supervisors,

MCA has continuously and vocally supported the need for increased enforcement on the perpetrators of egregious crimes against our environment and population. We have also encouraged increased hiring in the Sheriff's department, Planning and Building Services, and the Mendocino Cannabis Program (MCP). Specifically in regards to this item, we support the Long Term Strategic Plan identified within the presentation. With this support clearly stated, we feel it is important to consider the following items to ensure the equitable and effective implementation of the increased enforcement efforts being discussed today.

1. Long Term Strategic Plan

Stage One of the Plan mentions 'initial contact letters for voluntary compliance.' We encourage a wide-ranging public awareness campaign, on multiple media platforms, including radio, internet, email, newspaper and printed materials distributed throughout the county to inform the public about the process that is planned.

We reiterate our belief that "*enforcement without opportunity is a broken paradigm*", and that steps must be taken to enable additional on-ramps for up to 10,000 sq ft of cultivation to enter the highly regulated licensing program, which will result in greater benefit to the community due to increased environmental and community protections through direct registrations that may be held accountable.

2. Clear Definitions of Roles

Much of the presentation provided for this meeting indicates a multi-departmental collaboration on increased enforcement efforts. To the extent that the MCP itself is

involved in these efforts, we believe it is essential to delineate what these new tasks will be, and to ensure that the already overburdened department is able to focus on their primary responsibility of permit application processing to alleviate the substantial backlog of work currently in the queue. As this workload will only increase with the passage of the new ordinance bringing an influx of transitioning and new applications, adding new responsibilities to MCP without clearly defined roles and responsibilities could counteract many of the essential streamlining efforts already underway.

3. Satellite Imagery

Considering the recently declared State of Emergency due to historic drought conditions, we believe that the County should be using all tools at its disposal to enforce ANY and ALL illegal water diversion. Given this fact, and the above mentioned concern, we find it problematic that control of the Satellite Imagery Program will be housed within the Cannabis Program, as opposed to within Code Enforcement. We have previously shared the facts about cannabis water usage with this Board which clearly indicate that cannabis uses substantially less water than all of the other types of commercial agriculture occurring in Mendocino County. Focusing enforcement efforts, and messaging about enforcement efforts, exclusively on cannabis cultivation gives unscrupulous actors in other industries a free pass to act without concern for being discovered.

We thank you for your consideration of these items in your deliberation.

Sincerely,

Mendocino Cannabis Alliance
e: admin@mendocannabis.com