

June 1, 2021

Board of Supervisors
County of Mendocino

Dear Supervisors Gjerde, Haschak, Williams, Mulheren and McGourty:

Thank you for your diligent and tireless work on cannabis policy in our county. I know it's been a long and strenuous journey (a "slog" as we like to call it in my family). I hope you share my hope for an outcome that will serve all of our citizens, current and future. Although I have written you previously on this topic, I have new points and concerns to address today. I hope you will read this letter in its entirety. I am a member of the Redwood Valley Municipal Advisory Council and its Cannabis Policy ad hoc; however, I am speaking only for myself today. I wish to address three areas with bolded headlines below.

The 10%

The Planning Commission got it right—two acres at most. Personally, I would support one acre and then revisit in a year or two.

HOOP HOUSES

At a previous BOS meeting (which I attended all day—it's how I have an inkling of the "slog" that is your reality at this juncture), it seemed three or four of you were solidly in favor of sun-grown & in-the-ground. I was very encouraged that you understood the value of this way of cultivating. It is so in-keeping with what makes Mendocino County the most special place on earth, a place where people want to vacation...and then live (as my family decided to do after a dozen vacations here). But then at the next BOS meeting, there was a huge pushback from the pro-hoop-house vocal minority. Here is why we must say no to hoop houses *period*. (*Note: I do not oppose high-quality engineered greenhouses in general, but they should be allowed only in industrial zones in very small sizes for seedling propagation*).

- I. Hoop houses are a blight on our pastoral viewsheds. If this is not already clear to you, please let me take you on a tour of Redwood Valley at your earliest convenience.
- II. Hoop houses break down into micro-plastics in our environment. Those micro-plastics poison our soils, our water, our wildlife and our bodies. This is real science¹. Indoor growing is bad too.^{2 3}

¹ https://www.researchgate.net/publication/346023657_Potential_impacts_of_plastic_from_cannabis_cultivation_on_fish_and_wildlife_resources

² <https://enr.source.colostate.edu/insatiable-demand-for-cannabis-has-created-a-giant-carbon-footprint/>

³ <https://www.nature.com/articles/s41893-021-00691-w>

- III. The only point of hoop houses is to cultivate many crops per year—three or four or five (I have been told by cultivators)—instead of just one (or maybe two, I have heard) in the sunlight. These multiple crops per year multiply the stresses on our community and our resources in the following ways:
- A. Water resources: 3-5 crops a year means 3-5 times as much water at a time of devastating drought. There are people whose wells have run dry already. There are farmers who will lose perennial crops this year due to the shut-off of agricultural water service and the rescission of riparian water rights. Even if they can afford to drill a well, the drilling contractors have waiting lists six months long. I heard from a hydrologist who sites a lot of these wells that most of his customers are cultivators.
 - B. Energy needs: 3-5 crops a year means 3-5 times as much power required (and without the requirement for 100% renewable, the resulting increase to carbon emissions).
 - C. Transportation impacts: 3-5 crops a year means 3-5 times as much product to get to market; 3-5 times as many supplies to be purchased and delivered to the site; 3-5 times as many employee hours with related driving; 3-5 times as much impact on our roads; 3-5x as much impact on our air quality from vehicles.
 - D. Law enforcement and compliance impacts: 3-5 crops a year means law enforcement and compliance have to monitor and investigate year round. If all crops are sun-grown in the ground, the cost of monitoring legal cultivators and identifying illegal cultivators will be greatly reduced and county staff will be able to give more time and attention other urgent needs the rest of the year. (*Note: We really need our county departments and services back!*)
 - E. Community impacts: It would be difficult to exaggerate the negative impacts of legal and illegal cultivation on our communities, especially during the last few years since legalization. Our communities struggle with influx of people who don't have any connection or loyalty to the community—cartel, “trimigrants,” consultants, and corporations—many of whom don't actually live in this county. People are traumatized by cannabis culture and this trauma is compounded by the recurrent traumas of deathly fire and drought. I know you say the nightmare will end with active enforcement, but with 3-5 crops per year, the nightmare will also continue. People need a break from year-round cannabis cultivation. Please say NO to “mixed-light” and indoor cultivation.

SITE-SPECIFIC CEQA VS. EIR One of the ways the proposed ordinance unfairly affects small growers is in the cost of site-specific CEQA. One of the ways we could rectify that AND reduce opposition to the new ordinance in the environmental community (and avoid a potential referendum), is to agree to a countywide Environmental Impact Report. Apparently Humboldt County did this at a cost under \$300,000. The expense will more than pay for itself and remove the burden on county staff to process applications that won't succeed.

ABATEMENT OF UNLICENSED DEVELOPMENT BEFORE PERMIT ELIGIBILITY

Permitted or non-permitted cultivators who “jumped the gun” by erecting hoop houses/ structures (even if they were permitted for other crops), clearing land, removing trees,

erecting fencing, covering native soils with gravel/baserock, etc. should be automatically disqualified from applying for a permit under the new ordinance until the structures have been removed and the damage abated. The owners of such properties should be prevented from selling the property until the damage has been abated. (See item III. E above, "Community impacts/trauma").

DEFINITION OF "TILLAGE" I do not support any definition of tillage of Rangeland that would allow cultivation on a parcel that was previous "disturbed" by prior cannabis cultivation.

ACTIVE ENFORCEMENT ASAP PLEASE You approved active enforcement at a prior meeting but we are still waiting. I understand you will meet to approve the budget for this next week. Please approve whatever it costs and make it happen as soon as possible.

Thank you for your time and attention to this urgent matter. It is my sincerest hope that you make prudent decisions so that we can all enjoy the peace and beauty of the lovely place where we live, and avoid the stress and inevitable divisiveness of a referendum.

Respectfully,

Sattie Clark
Redwood Valley