

Mendocino County

MAY 05 2021

Planning & Building Services

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>>> RoundValleyCountyWaterDistrict Covelo <rvcwdmanager@gmail.com> 5/5/2021 11:19 AM >>>

Dear Planning Commission,

Please see attached, a second letter of comment from the Round Valley County Water District regarding the proposed cannabis ordinance.

Best,
Imil

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Imil Ferrara
Manager
Round Valley County Water District
PO Box 535
Covelo, CA 95428
[707-972-2115](tel:707-972-2115)

Board of Directors
Denis L. Moore, Chairman
Dane Downing, Vice
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Manager
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Round Valley County Water District



PO Box 535, Covelo, California 95428
707-468-3839
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May 5, 2021

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

Re: Regarding exclusion of Round Valley from cannabis expansion, pending completion of EIR that includes hydrological study and likely cumulative impacts.

Dear Commissioners:

In our letter to you of March 15, 2021, we raised concerns about the vast increase in groundwater usage, chemical usage, and sanitation issues that could result if the proposed ordinance is adopted. It is our firm belief that a comprehensive environmental impact review of the proposed ordinance should be performed by the county, including an in-depth study of possible cumulative effects on groundwater supplies, to mitigate any potentially irreversible damage to the Round Valley aquifer.

Of great concern is that the Round Valley aquifer is a closed aquifer. Groundwater collects in the valley like a bowl and, unlike the flowing aquifers in other areas of the county, does not flow outside of this confined area. As you know, fertilizers, chemicals, herbicides and poisons, some of which originate in Mexico and are banned here in the United States, have been found at cannabis grow sites. Pollutants released in the watershed surrounding Round Valley are transported into the valley by surface water and permitted to enter the aquifer via the alluvial fans at each of the five major streams entering the valley. The alluvial fans are major recharge areas for the aquifer as they are virtually solid gravel from the surface, extending down into the aquifer and allowing water to flow into it. If the aquifer is drawn down far below the surface, the chemicals may perk through the soil and deep into the aquifer. Any pollution entering the aquifer will stay in the aquifer and likely spread throughout the valley.

The risk for ground subsidence is another issue that needs to be evaluated. When excessive aquifer pumping and depletion have occurred in other areas, ground subsidence has occurred, with a permanent loss of groundwater storage capacity. The risk of subsidence in Round Valley should be studied, and mechanisms for limiting cultivation during drought years should be implemented, prior to allowing expansion.

There has never been a comprehensive study of Round Valley's unique aquifer, making its supply, structure, and vulnerability to impacts largely unknown. The cost of such a study is far too high for the Round Valley County Water District to execute, and it is unreasonable to expect it would be performed within the site-specific CEQA process of individual cannabis permit applicants. Therefore, the Round Valley County Water District requests Round Valley be excluded from the dramatic expansion of

cannabis cultivation allowed in the currently proposed Phase 3 ordinance until the county completes a comprehensive groundwater study as part of an environmental impact review of likely cumulative impacts. If the county does not honor this request, we ask that, at a minimum, professional hydrological studies be conducted before issuing individual permits, and that Round Valley County Water District be included in developing study protocols and reviewing study findings prior to permit approval.

We also urge the county to budget sufficient funds to adequately monitor and enforce provisions of any adopted ordinance. We understand the legal cannabis framework is intended to prohibit the use of dangerous chemicals and other destructive behaviors, but we have not seen this reflected in practice. There must be sufficient tax revenue generated from cannabis activity within the county to support vigorous ongoing monitoring and enforcement. Failure to do so will result in an ordinance that encourages expansion and provides no concomitant limitation.

Sincerely,

A handwritten signature in black ink that reads "Denis L. Moore". The signature is written in a cursive style with a large, stylized "D" and "M".

Denis L. Moore, Chairman
Round Valley County Water District