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>>> Covelo Cannabis Advocacy <covelocannabisgroup@gmail.com> 5/5/2021 11:42 AM >>>

Good afternoon Planning Commissioners,

Please find our CCAG memo in the attachment below regarding Agenda Item 6c.

Thank you so much for the opportunity to provide input on this important agenda item.

Respectfully,

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Monique Ramirez

Founder- Covelo Cannabis Advocacy Group

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May 5th, 2021

Re: Planning Commission Meeting 5-6-2021 Agenda Item 6c

Dear Honorable Planning Commissioners,

The Covelo Cannabis Advocacy Group (CCAG) stands strongly opposed to 10% acreage expansion on AG or RL parcels. CCAG proposes alternative recommendations that will still allow for expansion opportunities while creating a more equitable pathway for not only new cultivators, but also for those that transition from Phase 1 to the CCAO.

Our following recommendations are as follows:

1. **Allow up to 22,000 sq ft of cultivation with a Minor Use Permit for those in RR10, UR, RL, FL, TPZ zoning for existing Phase 1 operators that would like to expand their site**
2. **Allow up to 22,000 sq ft of cultivation with a Major Use Permit for those in RR10, UR, RL, FL, TPZ for NEW operators applying under the Phase 3 ordinance for operators that have never cultivated before**
3. **Allow up to 1 acre of cultivation with a Major Use Permit on AG land zoning with a 20 acre minimum parcel size**
4. **Allow 2,500 sq ft of cultivation on a parcel that is 1 acre in size or larger**
5. **Allow Mixed Light & Indoor to be cultivated with a maximum of 10,000 sq ft**

In reviewing the Staff memo, we have concerns for some of the recommendations and have provided our comments below.

1. **CCAG recommends that any site that is larger than 22,000 sq ft should require a hydrological study.** The current recommendation will require a hydrological study if 1,500 gallons of water or more is used per day. While we appreciate that this will be

a requirement, how will the use permit process ensure that applicants are being honest with their water usage needs? How will new applicants be able to determine how much water will be used when they have never cultivated before? We recommend that a hydrological study be triggered by canopy size not gallons of water used per day.

2. **The tillage requirement on RL parcels should not apply to applicants cultivating 22,000 sq ft or less.** CCAG recommends aligning with tillage to mean: *land which has been worked by plowing, sowing, and raising crops OR Cropping history with a record of the crop that was on the land during each of the 3 years preceding the current inventory year.* This requirement should apply to all RL parcels that apply for 10% acreage expansion.
3. **CCAG recommends that a cap of 2 Land Use permits per person/business entity be a requirement of the CCAO.** Under Chapter 10A.17 all applicants are capped to a maximum of 2 permits per person. CCAG strongly recommends that there should also be caps for how many CCAO permits an applicant/business can hold.
4. **CCAG recommends requiring a Best Management Practices plan to be included in the CCAO application process.** All new and expanded sites should demonstrate a path towards sustainability in order to qualify for a land use permit. It's important for the cannabis industry to care for the land and be held to responsible growing practices. A few examples would include recycling plastic, reducing waste, closing loops, mulching for water conservation, building compost onsite etc. CCAG recommends that the County consider incorporating a BMP into the CCAO application process.

Thank you for the opportunity to provide feedback on this important land use ordinance. We strongly urge the planning commission to consider our recommendations.

Respectfully,



Monique Ramirez

For the Covelo Cannabis Advocacy Group