

Angie Lane - Fwd: Cannabis Cultivation Ordinance review, 6a

From: PBS PBS
To: Angie Lane
Date: 5/5/2021 2:48 PM
Subject: Fwd: Cannabis Cultivation Ordinance review, 6a

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Dear Planning Commissioners,

Unlike Supervisors Gjerde, Mulheren, Williams and McGourty, I hope you will appreciate and support the overwhelming majority of cannabis business owners, environmental advocates and the general public in revisiting and rejecting the Board's decision to allow cannabis cultivation up to 10% of a parcel size. The Commission discussed, at length on March 19th, the potential consequences of acres of new cannabis cultivation, particularly in extreme draught conditions. Please bring a new vote on "10% expansion" with the current Planning Commission.

Please remember, any permit size expansion beyond one acre prior to January 1, 2023, will be unlawful under State regulations. Any action to allow larger cultivation permits here is moot for nearly another two years. In this time more effort can be devoted to developing a comprehensive regulatory structure which permits sustainability for small farmers, the Craft operations (for all the obvious reasons) and not urgently jump to embrace the promises and propaganda of a few large commercial growers who do not deserve and did not contribute to the legacy and reputation of our heritage cultivators.

Please consider the following:

- 1) There is still no streamlined application process for Phase 1 and 2 cultivation permittees to transition to Phase 3 and a use permit.
- 2) Page 3 (4): Staff is newly advocating for greater than 10% of parcel size expansion, and contrary to 10A.17 conditions under which existing permitted cultivators complied. In the past, different cultivation styles (outdoor, indoor etc.) could exist under one cultivation permit, but the cumulative canopy square footage combined to qualify for a permit size, inclusively. The proposed language allows multiples of square footage with each cultivation style. I advocate for a maximum per parcel, all to be included within the maximum permit size. Otherwise, the applicant must secure individual permits for the different styles of cultivation they employ.

- 3) I support Finding (7) on Page 4, allowing a phase out of water delivery. I recommend an extension to June 1, 2023 which will allow for engineering, permits, construction, etc. of alternative water supply systems. I reject Supervisor Williams' interpretation that a draught is not an "emergency". Surely, we will all agree a flood is an emergency, a draught is equally an emergency at the other end of the spectrum!
- 4) Page 4(9) needs to be more specific. Currently this amendment allows Planning and Building Staff to arbitrarily close application acceptance. The public needs to be able to plan around such closures and know how long they will last. I highly recommend that such application hiatuses be contained to predetermined days or weeks per quarter. Otherwise, will may have lengthy periods, like now, when applications are not accepted or processed. We want the opposite, greater access for new applicants. A State declared EMERGENCY, is a local emergency also when proclaimed by the Governor.
- 5) I highly recommend that back up generators be allowed in cultivation operations, regardless of growing style, to avert damage in sever climatic swings during the seedling and curing processes. Such use would be akin to generators powering fans during certain climatic conditions impacting vineyards. Occasional generator use, and not a primary or sole use, must be allowed as they are in other agriculture.

There are myriad objections to the Phase 3 ordinance as proposed. In general, the MCA & CCAG memo have presented solid rationales for their recommendation which I support as valid and timely. I sincerely encourage the Planning Commission to study the gravity of community objections, and return "no confidence" opinions where appropriate.

If any Commissioner has questions regarding my comments, please contact me directly at this email address.

Thank you very much for your consideration.

Corinne Powell
Laughing Farm, a Mutual Benefit Corporation
County Permit: AG 2017-0332
State License: CCL18-0002028