

Planning & Building Services Staff

County of Mendocino

Main Office:

860 N. Bush St, Ukiah CA 95482

Phone: [\(707\) 234-6650](tel:(707)234-6650)

Coast Office:

120 W. Fir St, Fort Bragg CA 95437

Phone: [\(707\) 964-5379](tel:(707)964-5379)

Web: www.co.mendocino.ca.us/planning/

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>>> Tekla Broz <trbroz@gmail.com> 5/5/2021 4:49 PM >>>

May 5, 2021

Honored Commissioners,

My name is Tekla Broz. I am a retired elementary school teacher, who has taught and lived in Covelo for over 30 years. I currently have a State provisional license and County permit for cultivating Cottage Tier I (2,500 sq. ft.) outdoor, organic cannabis.

I am writing to you in support of the memo from Covelo Cannabis Advocacy Group on the topic of expansion of capped acreage open for permitting to cannabis cultivation. In addition to that, I would like to give you my reasoning for opposing this major expansion.

I would like to ask you to delay or deny or modify your approval for the massive expansion of acreage for cannabis cultivation, which would approve 10% of an owner's land in certain zones of land. This expansion was evaluated by the Planning Commission, and it is my understanding that there is pressure on you to approve it as soon as possible as part of the Phase 3 opening of the County for non-legacy permits under our Cannabis Ordinance, to avoid having to do a County-wide EIR. It is my opinion that this expansion is such an unpopular idea and would have such far reaching effects on our communities and economy that it should be put before the voters as a Measure to vote on, rather than just the Board deciding it for us. Please open Phase 3 without this gross expansion, or at least reduce it to a maximum 1 acre.

As a cultivator, and as a community member I have many reasons for my opposition to this massive expansion. This explosive expansion is an environmentally, economically, equity and socially unsound idea.

It is environmentally unsound, as water is at a premium in our county because we are in the midst of climate change inflicted drought. Trash from larger grows is already a problem for the County, in collecting, hauling, disposing and because of abandoned and dumped trash. To expand cultivation without addressing the trash disposal problem would be unwise. To make this kind of gross expansion possible without evaluating the cumulative effects County wide is, I am sorry, absolutely foolhardy. If you must do this, institute a County-wide EIR evaluating it. I recommend asking the companies in favor of this expansion to pay for that EIR.

It is economically unsound, because a massive increase in the amount of cannabis produced in the County will only add to the current flood that is clogging our markets. We can only sell within the State at the moment. More cannabis is being produced (legally) than the market wants, there are not enough distribution points, cultivators cannot sell direct without paying for more licenses, and the prices are diving. When the state and international borders open up, as they inevitably will, we will all benefit, but by then it will be too late for most of the small legacy farmers, who will have been forced out of business, if you pass this unwise expansion.

On the subject of equity, small farmers by and large have been cultivating as medical producers for decades, and have taken the huge and risky step of stepping forward, attempting to satisfy the ever changing array of state and local requirements for a legal permit, and are offering to pay the amazingly high amount of fees and taxes to agencies in order to bring the legal market forward. I know that this was my reasoning in applying for a permit. We were capped at 10,000 sq ft per permit. Why is it that now the permitting process will be thrown open to larger and larger acreage? Will Phase One still be capped at 10K? This seems grossly unfair. Open Phase Three to a slight increase, 22,000 sq ft, if you must, and make that increase available to Phase One and Two without change to their local licenses.

The expansion would be socially unsound, because many of our rural, small communities and businesses depend on the presence of legal, local small growers in their schools, as invested community members working for the good of the community, and as workers paying into the local tax base. Larger grows, managed from a distance, would reduce the local populations of these small towns.

Such a large increase, (the current cap is at 10,000 sq. ft, which would change to an unknown upper figure, certainly in the tens of acres, and with no word on how many such permits will be allowed, or timeline to end this expansion) would be unsound in its effect on criminal justice.

How would the County ensure the safety of these larger grows from marauding invasion burgleries, theft and vandalism when those are already happening at an unacceptable rate to the smaller growers? How will the County enforce the prohibition of illegal growing on this scale, which is already occurring and needs to be addressed? It seems that the ridiculously large illegal growing needs to be addressed before we try making legal grows to this scale. Are the County and State planning to elevate the numbers of law enforcement to our remote areas? Covelo already suffers in general from not enough sheriff and CHP presence.

As you can see, there are many reasons why this precipitous expansion is ill-advised. Many, many residents who are not growers are opposed to it. Round Valley Municipal Advisory Council, Laytonville Municipal Advisory Council, Willits Environmental Group, Covelo Cannabis Advocacy Group and multiple community members, including some from Round Valley Tribes, are opposed to this expansion. Why are you rushing this through?

Please put the expansion idea to the voters to express their opinions. You are receiving multiple petitions and surveys against it, but they cannot be verified in the same way that a County wide election would be.

Please pass the Phase 3 section of the ordinance without this ill-considered, hasty, exponential expansion of acreage allowed. If you must expand, cap it at 22,000 sq ft or 1 acre for now, and see how that goes. Err on the side of caution, rather than opening the floodgates and then regretting it. Remember the logging industry.

Thank you for your attention to this long letter

Sincerely, Tekla Broz, North Fork Garden Society, Covelo CA

trbroz@gmail.com [\(707\)367-1990](tel:(707)367-1990)