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Planning & Building Services

Round Valley Area Municipal Advisory Council  
PO Box 372 Covelo, CA 95428  
"Serving the People of the Greater Round Valley Area"

May 6, 2021

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

Re: Opposition to expansion of cannabis cultivation to 10% of parcel size within the Round Valley Area district.

Dear Commissioners,

The Round Valley Municipal Advisory Council is unanimously opposed to the expansion of cannabis cultivation up to 10% of parcel acreage, including in Ag, Rangeland, and Upland Residential zoning districts. The following concerns have been identified by the community.

Planning staff is already overburdened and unable to keep up with the work load required to manage the permitting process for those who have already applied. Expanding cultivation prior to getting caught up with issuing the permits to current applicants would only add to their burden and seems inappropriate at this time.

Law enforcement is already unable to keep up with the increased number of cannabis violations and the number of robberies, traffic accidents, murders, car jackings, and kidnappings are also increasing.

Water resources are already negatively impacted by the existing cultivation within the District and would be exacerbated if cultivation were allowed to increase. Impacts already being seen within the community include the draw down of wells in localized areas near cultivation sites, siphoning of and pollution of the Eel River and it's tributaries, and unregulated water delivery businesses that fall outside the scope of any kind of monitoring for impacts to wells, rivers, or streams. Increasing allowable cultivation would only add to existing water resource concerns felt within the community.

Large cultivation sites are already bringing huge numbers of transient workers into our community. These transient works have no place to live and so, create unhealthy encampments. Additionally, the town's sewer district is already at capacity and currently under moratorium for expansion,

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so the development of more affordable housing is not possible in the near term to meet any increased housing needs that would be needed to meet increased labor force, if cannabis cultivation were to be expanded in the area.

In addition to the environmental and community impacts above, it's important to also note Mendocino County's goal of protecting small legacy cultivators. There are many benefits to the existence of small and cottage level industries especially in predominantly rural areas like our county. These growers make up a significant fraction of the local community, most of their dollars flow back into the community, and the operations are, excepting egregious unregulated operators, consistent with the character of the county. Large corporate grows are the antithesis of this. Although it is much more challenging to permit and oversee a multitude of small growers, as opposed to a few large corporate players, this is what the county promised with the original ordinance creating the cannabis program. The intent of honoring and protecting small legacy cultivators should be upheld.

Regarding the question of equity, Prop 64 promised an initial phase where corporate players would be discouraged, and small legacy growers were to be given a chance to get established under the new legal paradigm, until 2023, by limiting the maximum canopy size to one acre. Additionally, CDFA limited the association of small farmers to form co-ops to no more than 4 acres of total canopy among the members. This meant that small farmers could maximally compete as a bloc with 4 acres of production while corporate player's production was limited only by the willingness of county authorities, thus expansion may give an unfair advantage to larger corporate entities and undermine the objective of Mendocino County to protect the small legacy cultivators within the community. And, as noted above, there are still many small legacy cultivators who are still waiting permit approval through the County. Opening the door to larger cultivators while many small cultivators are still awaiting their permits increases these equity concerns.

As you can see with the issues above, expansion of cannabis cultivation is not in the best interest of the Round Valley Area community. Therefore, the Round Valley Area Municipal Advisory Council opposes the proposal to allow expansion of cannabis cultivation to up to 10% of parcel size.

Thank you for your thoughtful consideration,

Jessica Stull-Otto  
Presiding Officer  
Round Valley Area Municipal Advisory Council