

Dear Planning Commissioners,

Seeing a lack of data in the packets, I wanted to make sure the potential impacts to our community of Round Valley are better understood. Below is some math I did to calculate the potential cultivation on AG land in Round Valley. Please take this very seriously, as it represents a HUGE jump in cultivation allowance, which is a major concern for our community and our Water District.

I also request that for any and all cannabis cultivation permits issued, there needs to be an adequate hydrologic study to assess the impacts the cultivation site will have on the aquifer as a whole. These studies should be designed in partnership with the respective local Water Districts, as they know their aquifers best. No permit should be issued without getting the approval of the Water District, after they have been able to determine there will not be adverse impacts to the community's water supplies.

It is also crucial for the Water Districts to be fully informed as to location and use of all permitted cannabis farms so they can identify problems that may arise in the future and, if any such negative impacts to the aquifer are noted, cultivation should be halted immediately until the concerns are addressed, so that we can prevent irreversible impacts such as chemical pollutants contaminating our aquifer or subsidence that reduces the holding capacity of the aquifer.

As Climate Change is leading to a more unpredictable future, that will undoubtedly have more extreme drought years, as we are seeing currently, there needs to be a mechanism within the permitting process that reduces or halts cultivation during drought emergencies, to protect the water resources that are needed for health and safety and for cultivating food crops, which should be given priority for water use.

In order to assure all of the protections put in place are effective, the County's Code Enforcement division needs to be increased to a capacity that can realistically oversee and proactively address situations that may pose threats to the public, including our collective water resources, in a timely manner.

Using parcel data from the Planning department, I did a little math on cultivation potential on AG land here in and Round Valley. Please note this is just for AG zoned land that is greater than 10 acres within the Round Valley area. RL calculations would take more tools than I have on hand, but that too would allow for some increased acreage that is not included in the info below. The image attached is a zoning map of the area.

AG Parcels > 10 acres: 226 parcels

Total acreage of AG parcels > 10 acres: 11,183 acres

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If the max cultivation permit currently allowable is 10,000 Square Feet, that means there could be a max of 226 permits at that size, which would total 52 acres of cultivation on AG land.

Under the 10% of acreage cultivation allowance on AG land, that would equal 1,118 acres on AG land alone in Round Valley.

That's adding a potential of 1,066 additional acres of allowable cultivation on AG land alone in Round Valley!!

The 10% acreage expansion would allow a 2,155% increase of allowable cultivation on AG land in Round valley, or nearly 22 times more than what is currently allowed on AG land.

Do we have enough water for this level of increased cultivation? Our local Round Valley County Water District doesn't seem to think so and has expressed concerns in a letter sent to the Planning Commission & Board of Supervisors. And if not, does that mean we're going to allow this expansion for all those who can prove they have water until we're out of water? It's clear that people from out of the area are already buying up land for the purpose of land speculation and cannabis cultivation here in the valley.

The Covelo CalFire well is already showing signs that it will soon run dry, as stated during the April 12th BOS meeting on water shortages, and the CalFire Chief expressed concerns that when the well runs dry and no longer has water pressure, the aquifer could subside and water storage capacity could be lost forever, as we've seen over the years in other parts of CA.

The Round Valley County Water District has also expressed concern with this high level of development potential the 10% would allow in Round Valley. We are ALL on wells here, we have no municipal water system to help meet the needs of the community when the water table begins to drop below the level of some of our wells, which we are ALREADY seeing happen here.

This expansion is not desired by our community either. The Round Valley Area MAC has held several public meetings with the topic of cannabis cultivation expansion on the agenda and 100% of those who attend the meetings express very strongly that they are against the 10% of acreage expansion, for a vast array of reasons.

Please, listen to our community and take the 10% off the table if you are going to move forward with the Ordinance for phase 3.

Please, slow down and consider expansion more wisely and carefully, for the well being of all the communities within Mendocino County, including those of us in Round Valley.

Jessica Stull-Otto