

## James Feenan

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**From:** pbscommissions  
**Sent:** Thursday, April 20, 2023 3:14 PM  
**To:** James Feenan; Jocelyn Gonzalez-Thies; Russell Ford  
**Cc:** Matthew Kiedrowski; Julia Krog  
**Subject:** FW: a Cannabis Prohibition (CP) Combining District

Mendocino County

**From:** Javier Rau <javier@rauandassoc.com>  
**Sent:** Thursday, April 20, 2023 8:23 AM  
**To:** pbscommissions <pbscommissions@mendocinocounty.org>  
**Subject:** a Cannabis Prohibition (CP) Combining District

APR 20 2023

Planning & Building Services

Dear Honorable Planning Commission Members,

I have been involved as a compliance consultant since Mendocino County adopted the ordinance commonly known as 10A.17 to regulate and enforce the State passing proposition 64 in 2016. I was also working as a third party consultant for the sheriffs department in 2015-2016 during the emergency ordinance called the 9.31 program or zip tie program. I have been to over 1000 farms, some licensed and others seeking an opinion if compliance was possible with all the regularizations as associated costs involved.

I have read all the letters and staff report in regards to this agenda item you will hear today.

I have a few comments to consider.

I don't live in the Redwood Valley area but have been in Mendocino County my entire life. So while I can appreciate the concerns of the neighbors who would like to create this prohibition district *is it* really addressing the actual problem. The 10A.17 ordinance clearly encourages farms to be cultivated on parcels which are zoned AG and particularly in the Valley Floors due to the fact that the environmental impacts were done and absorbed some 50 years ago when the vineyard was developed. No trees need to be cut, no major grading projects need to be designed on the side of a mountain, no erosion control issues and most have adequate water resources (wells and Ponds) to farm the acres and acres of grapes that existed on the site in the past.

Also, there are 25 unregulated farms in the immediate area that don't fall within this delineated district. Could it be possible that they are contributing to some of these concerns as stated in these letters from the neighbors? Is it possible that these farms which have zero oversight from agencies such as water board, California department of Fish and Wildlife (CDFW), County of Mendocino Code Enforcement (MCE), and the Department of Cannabis Control (DCC) could be contributing to the traffic. Could it be that a water truck delivery business a half mile up the street is putting added wear and tear to the road surface? The two licensed farms that fall within this district have gone through the regulated gauntlet and have had these inspections from the water board, code enforcement, CDFW and DCC. They are on the oversight radar if you will.

So, is there another way to keep the peace in the neighborhood and get along. Here is one idea. The County has the ability to use real time aerial surveillance. How difficult could it be to see a farm on google earth, check with the DCCC if they are licensed ( it takes 1 min.), use parcel quest to find out where the tax statement is sent and send a friendly

reminder that they are not in the cannabis program locally or at the state level and should self-abate or there will be consequences. Humboldt and other counties do it every day, it works.

Lastly, if this does pass it could potentially create a precedent where this group or other groups methodically work through the entire valley creating prohibition zones and before you know it the entire valley along with Potter, Ukiah, Laytonville, Covelo and Hopland Valleys are prohibited and cannabis farms are pushed back into the hillsides creating much larger environmental impacts. Will hog and cow farms be next

Please consider these ideas to find a common goal with working with the neighbor folks and cultivators where we can all enjoy the beauty of Mendocino County.

Thank you for your time!

Javier Rau  
GSD Synergy  
Ukiah CA