



May 10th, 2021

Re: BOS 5-11-2021 Meeting Agenda Item 5c

Dear Honorable Board of Supervisors,

CCAG would like to offer support for the Staff presentation on future enforcement efforts. The presentation slides provide insight into how the recalibration of enforcement will be structured with the addition of key management staff assistants to help bridge between the Code Enforcement Program, Cannabis Program and the Sheriff's Department.

We support prioritization enforcement efforts of violent crimes followed by egregious environmental degradation. These types of illegal cannabis sites are of great concern to our community in Covelo and should definitely be the top priority County wide.

We have concerns about the Satellite Imagery being housed with the Cannabis Program. CCAG would like to recommend that it be held with Code Enforcement. Especially with the added workload of a new cannabis ordinance about to go into effect, Appendix G applications to process and a new portal for existing embossed receipt holders, it seems that adding another task for the Cannabis Program to manage may not be the most efficient direction at this time.

In one of the slides in the presentation, it states: "*Cannabis Department utilize satellite imagery for verification and complaint response of in-program cultivation sites to supplement site inspections*"

CCAG requests that a re-examination of permit fee costs be analyzed and adjusted to meet cost recovery if satellite imagery will be used in lieu of site inspections. This would reduce the current permitting fee costs and should be adjusted as such. CCAG recommends that new cannabis permit fees be included in the 2021/2022 Budget.

If the use of Satellite imagery will be used primarily to identify illegal cultivation sites, how will the imagery be able to differentiate between cannabis or other crops such as vegetables, herbs or flowers that may be growing in hoop houses or greenhouse

structures? It's important that the County consider how to manage proper identification so that those producing non-cannabis crops such as vegetables are not caught in the crossfire.

CCAG recommends that the Board consider reopening the Building Amnesty program to create opportunities for landowners that have unpermitted structures to come forward before the Satellite Program is launched. This would help create incentives for people to begin the permitting process and reduce the workload of Code Enforcement and the Cannabis Program. The Building Amnesty Program was last in effect from July 1, 2016 to June 30, 2017 and previous to that was in effect from Jan. 1, 2010 through Dec. 31st, 2010.

CCAG recommends that the County utilize Compliance Plans for those that are using unpermitted structures. It's an important tool that can help cannabis applicants that are behind in permitting structures. The path to licensure is not easy, or affordable if there are pre-existing structures on a property that have to be permitted. Mendocino County should consider ways to help people come into compliance, either for illegal cannabis activity or for structures that need permitting. Otherwise, there will continue to be illegal sites that will put further strain on Code Enforcement, the Cannabis Program, Planning and Building and the Sheriff's Department.

Unfortunately, the current zoning table in Chapter 10A.17 excludes many small craft producers because of zoning or parcel acreage requirements. As Chapter 22.18 is finalized and adopted, the Board should seriously consider reducing the parcel acreage requirement from 5 acres to 1 acre to allow for more existing cottage operators to become licensed. It should be the goal of our County to provide as many pathways as possible to help transition illegal cultivation into a fully regulated, responsible and accountable legal market. Creating opportunities and incentives is key.

Thank you for consideration of our recommendations.

Respectfully,



Monique Ramirez

For the Covelo Cannabis Advocacy Group (CCAG)