

**From:** "Casey O'Neill" <casey@cagrowers.org>  
**To:** <davisv@mendocinocounty.org>  
**Date:** 1/31/2018 10:09 AM  
**Subject:** Comments for Planning Commission Feb 1st, Agenda Item OA\_2018\_0001

To: Mendocino County Planning Commission RE Item OA\_2018\_0001

From: Casey O'Neill, HappyDay Farms, Vice-Chair of Development for California Growers Assoc., Chair Mendocino County Growers Alliance.

Honorable Commissioners;

Thank you for the opportunity to comment on this issue. As a participant during the entire process of this ordinance development, the question of Rangeland Permitting is one that I have been tracking very closely and consistently. It was very much a surprise to encounter the provision requiring an Administrative Permit for cultivation sites on Rangeland, when discussions throughout the entire process had been for a Zoning Clearance.

I would like to note that allowing Rangeland Cultivation sites to increase to 10,000 sq feet of cultivation is ¼ acre of cultivation on parcels that are generally larger than 160 acres. The ordinance contains a prohibition on the cutting of trees, and State Resource Agency oversight is very specific. CDFW must sign-off on all state cultivation applications, and requirements by the State Water Board are in excess of any other agricultural industry.

It is important to point out that a landowner who wanted to cultivate ¼ acre of vegetables would have no review by the county whatsoever.

There is an extreme need to move these permits forward through our local process, and the County Building and Planning Department is struggling with the fallout from the fires last fall, lack of full staffing, and a huge amount of cannabis application processes. We need to streamline where it is possible, and removing the AP for Rangeland cultivators is an appropriate place to do so. This is especially true given the fact that participants in the ordinance process (from supervisors to stakeholders) agree that Rangeland was supposed to have been Zoning Clearance.

We respectfully disagree with the points made in the letter by the Willits Environmental Center and ask the Planning Commission to remove the requirement for the Administrative Permit on Rangeland, recognizing the many overlapping layers of regulation that are much more stringent than those applied to any other agricultural crop.

Thank you for your time.

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