

August 8th, 2017

Dear Board of Supervisors,

Thank you for taking the time to review and evaluate modifications to the Cannabis Ordinance.

The main concern I would like to bring up is with the Mendocino Sustainably Farmed Certification for which cultivators must prove they are growing organically in order to use the words "Mendocino Grown" on their products. I applaud the effort to associate Mendocino with organic practices, but I question the fee structure associated with it. It seems that tacking on an extra fee for farmers who are already doing the right thing for the environment does not create an incentive for more farmers to go organic. Putting the burden on those farmers who do not grow sustainably would make more farmers switch to sustainable practices. This is the same principle behind carbon credits, polluters are the ones who pay while those who are benefiting the environment gain. Unsustainable practices can actually add carbon to the air while sustainable practices sequester it in the ground. Sustainable farming methods that are scientifically proven to sequester carbon in the ground such as adding organic matter to the soil, planting cover crops, and reducing soil disturbance, are now being added to carbon credit programs. That's right, farmers are being paid for their sustainable practices while industries that produce carbon dioxide have to pay. This is the new paradigm. Relying on consumers to constantly make the right choice and choose more expensive sustainably farmed goods can only get us so far in improving the environment. Often times the sustainable option is more costly because the farmer has to cover the costs of certification. Flipping the script and making those who are not using sustainable practices pay will create more incentive to farm sustainably and create more affordable healthy options for consumers.

Organic farmers are already taking a voluntary hit in the pocketbook by consciously choosing to do the right thing for the environment. There are no statistics for cannabis yields using organic and non-organic practices but a study at the University of California Berkeley discovered that "organic farms are almost 20 percent less productive than conventional ones." Organic farmers yield less and therefore make less money. The conventional cultivators are the ones who are making more money at the cost of the environment of Mendocino County. The lower price with a higher yield totals more money than the higher price organic farmers get for their lower yield. Conventional fertilizers suspend nutrients in solution by bonding them to salts and heavy metals, these compounds are left behind in the soil and then wash out into the environment with winter rains. The

economic burden should be put on the conventional growers in order to make it clear that the incentive is towards adopting more sustainable practices.

More than half the applicants to the cannabis program said they are interested in the Mendocino Sustainably Farmed Certification. Not all of those interested fully understand what it takes to pass an organic certification. Not all of them will have \$970 to pay for certification after paying permit fees, taxes, and all the other new costs associated with compliance. A few dedicated souls who are passionate about sustainability will go through with it. They may be able to market their products for slightly more because they now say "Mendocino Grown" but will this slight cost increase cover the permit fee and the lower yield they sustain? Those who are truly passionate will not care, the idea of being organic means that much to them. But we should not live in a system where a dedicated few do the right thing at all costs; we should live in a system that promotes everyone to do the right thing by making doing the right thing the easy, less costly option.

Thank you for your consideration,

Anna Farnam

Sources:

<http://modernfarmer.com/2016/04/carbon-sequestration/>

<https://www.cnbc.com/2014/12/09/rought-resistant-report.html>