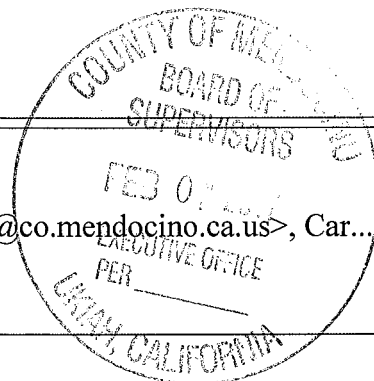


[REDACTED]

From: "Casey O'Neill" <casey@cagrowers.org>
To: <bos@co.mendocino.ca.us>, John McCowen <mccowen@co.mendocino.ca.us>, Car...
Date: 2/6/2017 10:14 PM
Subject: Letter for Cannabis Item, 2-7-17



To: Mendocino County Board of Supervisors

From: Casey O'Neill, Local Farmer, Vice-Chair California Growers Association

We support the coalition letter that was included in today's Board Packet from a number of organizations including CGA. We would like to offer a few further concerns regarding the development of the new ordinance. We are cognizant and appreciative of the complexity and the amount of time and effort that has been put into this policy question. It is one of the most important issues to face Mendocino County today, with far ranging ramifications for our communities, the environment and our local economy.

The following are suggestions offered to help further the effectiveness of the program in garnering participation and creating beneficial regulatory, environmental and social effects for our county.

Canopy- How canopy is measured will make a huge difference for the construction of cultivation sites and the actual management and spacing of plants. One type of good practice for full-season outdoor growers is to spread plants out and give them light and air movement in between. Outdoor cultivators often do this to avoid or minimize pest and pestilence pressure. If canopy is measured by individual plant square footage ($3.14 \times \text{Plant Diameter}$), there will be much more encouragement to farmers to spread plants out, reducing likelihood and volume of pesticide/fungicide usage. If canopy is measured by square footage of garden, there will be direct incentive to cultivators to cram more plants into the space. We propose that cultivators be responsible for measuring and recording square footage on Sept 1st for each full-season plant. Inspectors could spot check measurements and check that appropriate square footage for license type was in effect.

Rangeland Transfers; A great many cultivators were counting on moving to rangeland parcels. We suggest that transfers should be acceptable to rangeland parcels that have prior cultivation sites on them. We recognize the proposed Mitigation removing rangeland from the permit process, but suggest that for sites on which the environmental impacts have already occurred, cultivation relocation should be an option.

Bio-1- We agree with the language suggested in point 1 of the coalition letter. We would also like to suggest that for farmers relocating to a new parcel that provisional licenses become

immediately accessible while waiting for CDFW to respond. We are not sure what the capacity for response from the state agency will be, and it is prudent to allow these cultivators to participate with provisional licensure this season. It would make sense that the Provisional license should be granted on an interim basis and an Ag Dept inspection scheduled with as much immediacy as possible to confirm the viability of the relocation site.

Permit Renewals- We would urge that permittees from the 2016 Urgency Ordinance be eligible for legal, nonconforming uses if there are issues involving permitting of these sites. These cultivators went through the effort of the regulatory process during a trial period, and it would be appropriate to grant permits for sites that don't qualify under the current proposal.

Thank you for your time and efforts!

--

Casey O'Neill, HappyDay Farms,
Vice Chair California Growers Association
Cell: 707-354-1546 Casey@cagrowers.org
<http://www.calgrowersassociation.org/>