



April 16th, 2021

Re: BOS 4-19 Meeting, Agenda Item 3b

To the Mendocino County Board of Supervisors:

It has been a pleasure and honor to speak to many of you directly through the Covelo Cannabis Advocacy Group this past week. We are incredibly grateful for your time and efforts in creating a future for Mendocino County that is comprehensive, sustainable, and smart.

The purpose of this letter is to provide a “Best Management Practices” list that can be used by the county to determine which permit holders are in alignment with environmental integrity, as well as to create a branding business plan in which Mendocino County promotes the production of their cannabis as the cleanest and most conscientious product that the world will come to know.

We believe this type of branding needs to happen as a collective coordination among permit holders and the Mendocino County BOS in promoting and encouraging best practices and accountability checks on all cannabis sites. Mendocino County has the opportunity to set the standard for what beyond organic cannabis should look like and can use this to further increase a thriving economy.

We do have a lot of work to do first and foremost, in cleaning up our past mistakes in regulation, by offering too many permits without a strong enough accountability process. However, we can move forward with a positive and solution oriented attitude that brings us all to success and profitability. At this moment in time with the 10% expansion proposal, it seems mother nature is providing us an opportunity to compose a better system during this drought, and to be mindful in our proceedings regarding business and community ventures.

Best Management Practices List with definitions and examples:

1. **Closed Loop Systems** - multiple systems for the farm that decrease the dependence of external inputs and use what is readily available on site to supply the crops needs.

Examples: Growing directly in native soil in full sun, using fallen leaves as a soil builder, growing other crops that serve as biomass to add to soil, having wild zones, using local grasses and bark as mulch, interplanting to increase nutrient density in soil, saving seeds, worm farming, homemade potting and rooting soil, compost making and more.

2. **Water Conservation** - designing a water management program which decreases the need for excessive water usage.

Examples: water retention techniques such as heavily mulching the soil throughout the season, key line irrigation design, placing irrigation lines below a layer of mulch, groundwater recharge zones, swales, protected wild riparian zones, rainwater catchment systems, greywater systems, growing in the ground instead of pots or raised beds, watering during early morning or evening hours to avoid water evaporation during heat of the day, and more.

3. **Soil Building** - the process of layering the ground with only organic matter that regenerates, sequesters carbon, encourages healthy soil ecosystems, and prevents erosion and water loss.

Examples: adding layers of local grasses, hay, wood chips, tree pruning matter, compost, biomass, cover crops, heavily mulching the ground throughout the season, interplanting to increase soil diversity, planting perennials, and more.

4. **Minimized and Localized Inputs** - in relation to closed loop systems, all inputs added to the farm should be sourced within a 0 - 200 mile radius lowering the carbon footprint on site, without the use or overuse of bottled nutrients, earth-mined minerals, and highly processed products.

Examples: creating compost, herbal foliar sprays, teas, and more using ingredients grown on site or sourced locally, sourcing organic animal products directly on site or from local ranchers, collecting leaves on site or from a neighbor, collecting wood chips from state tree trimmings, mulching with local grasses, hay, and more.

5. **Composting of Waste** - using organic waste material as biomass for future inputs.

Examples: composting all cannabis stalks, roots, leaf material, etc., wood chipping stalks, roots, and branches, composting old soil and wasted leaf material, and more.

6. **Fair Employee Wages** - fair treatment and pay for all workers, livable wages at a *minimum* of \$20/hr or equivalent, developing long term employee relations with clean and functional housing, if provided.
7. **Integrated Livestock and Crops** - incorporation of rotational grazing, pasture raised animals that serve to assist in fire management, biomass production, secondary products and more. Integration of other crops within cannabis canopy that serve to assist in a multitude of beneficial purposes (see biodiversified gardens).
8. **Biodiversified Gardens** - creating gardens that contain a variety of native and beneficial plant, tree, food and fungi species (appropriate to zone location), which aid in assisting soil regeneration, soil remediation, pest management, pollinator attraction, carbon sequestration, creating sanctuaries for local wildlife, feeding communities, water retention, nutrient dispersal and more.

Examples: growing food and herbs alongside cannabis, establishing perennial plants, agroforestry practices which plant and conserve trees, trap crops, pollination gardens, growing beneficial and edible fungi within plant canopy, and more.

9. **Reducing or Eliminating Tillage** - no till or low till methods that do not involve use of heavy machinery, aiding in water holding capacity, keeps soil structure intact, preservation of living soils (contains beneficial bacteria, fungi, protozoa, earthworms, nematodes, and arthropods), and protection from pest and disease to crops.

Examples: using hand tools to gently break up topsoil, building soil rather than digging into soil, cover crops, spreading after-harvest residue to prepare soil for the next season, and more.

10. **Cover Cropping** - sowing seeds of arid and semi-arid cover crops which build soil fertility and protect soil from erosion.

Examples: chopping and dropping or crimping of cover crops to create green mulch, growing cover crops during off seasons or along with cannabis growth using drought resilient cover crop seeds, and more.

11. **Elimination of Waste Materials** - avoiding the purchase of all non organic or non biodegradable materials such as plastics - especially single use plastics, rockwool, perlite, smart pots, and more.

Examples: using wood plant tags instead of plastic tags, using biodegradable gloves, resharpening and maintaining tools to preserve their lifespan, using biodegradable netting, sourcing soil ingredients in bulk rather than single use plastic bags, storing all out of season tools and plastics in dry and enclosed locations to minimize degradation, creating seed flats out of wood, limiting hoop house structures, creating living fences and more.

This list is put together to provide a glimpse into what a best management practices program should look like in Mendocino County. We envision the application portal to have a best management practices checklist included, in which permit holders can check off the best practice actions taken and county inspectors can check off the best practices they have certified, via yearly inspections. We recommend 5 out of these 11 practices be required and a working option towards all 11.

When all 11 best management practices have been achieved by a given site, a county certification could ensue. This would further incentivise the picturesque and environmentally responsible cannabis groves that Mendocino County and it's cultivators should be known for. A county wide marketing of these practices would allow for future revenue through tourism and sales, branding with county certification, restoring our air quality through carbon sequestration, regenerating soil and watersheds, lowering waste and pollution to our environment, setting a global standard for the way in which cannabis should be grown, and so many more potential positive effects. This is an overdue matter in the agricultural industry and we believe that a best management practices program can be easily achieved resulting with incredibly beneficial impacts.

We are happy to serve as a bridge for our county, aspiring, and legacy permit holders, to provide education, demonstrations, and workshops that can dive further into these practices. We are grateful for your attention and efforts towards these very important implementations during a critical and fragile time in our world. We are open to further communications and ways in which we can assist in creating a successful cannabis program.

Respectfully,

Patricia Vargas, member of CCAG,
for the Covelo Cannabis Advocacy Group