

## **Maybe it is Time to Start Over with the Mendocino Cannabis Ordinances**

When the Board of Supervisors first mentioned abandoning the county cannabis ordinances I immediately became concerned. How will we be able to locally regulate wayward operations if it now is in the hands of the state? Yet the more I thought about it, the more I realized how broken the system currently is and that the negative impacts on our communities and wildlands are not being addressed. I believe that we need to step back and think about the impacts the current cannabis rules are having and to begin to craft a more long-range vision along with regulations that will get us there.

Cannabis ‘farmers’ tout land stewardship as they plead for loosening up cannabis ordinances. Yet the hillsides in the upland rural areas (specifically rural residential) are being bulldozed to fit in plastic greenhouses in which cannabis will essentially be factory raised (not farmed) in artificial environments. And the impacts are not isolated to just the property being ‘farmed’.

In our food plots we have seen unusual insect populations move through, the latest this year was the 3-banded cockroaches. Previously we have seen waves of leaf hoppers (including sharpshooters), russet mites, thrips, arg. ants, harlequin beetles, and the so-called super aphids. These are non-native and coming in via the **imported soils and cannabis plants**.

Concurrently in our open fields we have seen the demise of food insects (that the swallows, dragon flies and bats depend upon) as well as the native bee species. Our swallow population has crashed with all of the offspring lost through what appears to be starvation. We suspect this is due to the **increased use of pesticides**, organic or otherwise. We do not expect the swallows return next year. Gray rats have also showed up.

The result of these changing insect populations may very well be widespread native plant species loss and further crashes of native animal populations that depend on them.

Our ground water tables are falling, the result of indiscriminate drilling of wells to feed these crops when the truth is there is no aquifer to support them, only water pockets due to the nature of our geology and terrain. Residential well ‘targeting’ is common by the well drillers due to dry holes. The permitting process does not look at **water availability**, nor the impact on existing residents or native flora. At the very least, water meters and volume/usage disclosures are necessary. Ultimately the county is going to need this to defend itself as property owners’ wells dry up.

Our neighborhoods are overrun with **aggressive drivers** (contractors, workers, etc.) who have no sense of the community nor the cost of the gravel roads we must maintain. Roads are sprayed with chemicals, drainages are being blocked and the roads are increasingly tunnels of popsicle-stick fences -- a result of perceived county guidelines over security. And speaking of **security**, who is accountable for wrong-address break-

ins or assaults that come from outsiders targeting the increasing density of lucrative commercial grows in our communities?

In our community our CC&Rs discourage the establishment of commercial businesses that substantially increase traffic, as well as construction of structures within the road easements, both ignored by cannabis permitting. Permitting should involve the community governance entity (e.g. **road association**), when it exists, for appropriate assessment of impacts and with encouragement for involvement by these the so-called 'farmers'. Increasingly, property owners on fixed incomes will be forced out due to having to bear increasing costs for these commercial entities.

In an especially egregious example of regulatory oversight, an LA-based group in our community, at the property where the only exit (bridge) from the community is located, requested a permit for **solvent extraction**. The county only notified the immediate neighbors, ignoring the other 80+ properties that would be impacted, then overrode those members' objections. This is a remote-rural community well outside of fire station range.

Being involved in the first Mendocino Energy and Greenhouse Gas Emission Inventory (2008), I am estimating that the cannabis expansions **have increased our county-wide energy usage and emissions by at least 20%** (through greenhouse lighting, worker, soil and water deliveries, etc.). This does not take into account the embodied energy in the thousands of tons of plastics used in the greenhouses, soil / amendments containers, etc. (which also begs the question of how much of this plastic will end up in our soils, streams and the ocean as it breaks down).

Emerald Triangle, Mendo-grown, Humboldt – all highly recognized trade descriptors in the traditional (and pre-legal) cannabis market. Yet what did those mean to the consumer? -- primarily quality and uniqueness, both in taste and potency. Cannabis grown in Kentucky tasted and affected you completely different than cannabis grown here and premium prices were paid as a result.

When everyone is growing in imported soils, in plastic pots, inside greenhouse structures, with artificial lighting (full or supplemented) using imported cloned plants what distinguishes the product from that grown with the same practices in say Kentucky? Branding is becoming irrelevant, and if practices are not changed soon, the market price differential will be lost and our cannabis businesses will be in demise.

One approach is the use of **Appellations**, a concept that is used in the wine industry, which refers to the tastes imparted by native soils, biota, weather, etc. Growing in native soils (and their biota) also reduce water usage. I believe there is a bill in the California legislature that will **only** allow the use of regional labels (like 'Mendo') when traditional farming practices like native soils and light are used.

Can you imagine hillsides of wine grapes stretching for miles and all in plastic hoop houses, especially if they were lit up? We need to think the same for cannabis and to

embrace the sun-colored, fragrant and potent bounty of traditional cannabis farming that gave Mendocino its cred.

The cannabis production practices currently being used, supported by the county ordinances and regulations, are having a detrimental impact on our environment and communities. It is time to re-think the local industry and to codify our vision and concerns in a new compact. We need to start with preserving the environment, as well as the residential nature of the developed upland parcels.

*When we grow with the land we understand how the water flows to replenish, how the Native plants and trees nourish and protect. We heal rather than destroy. The same with our communities...*

Brian Corzilius  
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