

Robert Adelman
Benmore Valley Road
Lakeport, CA 95453
14 February, 2017

County of Lake
Community Development Department
ATTN: Bob Massarelli
255 N. Forbes Street
Lakeport, CA 95453

Bob:

I am writing to comment on the issue of greenhouses being required on agricultural land for commercial cannabis cultivation as discussed at the Planning Commission hearing on 8 February, 2018.

I have a history of conservation and ecological stewardship. For many years I was in alliance with attorney Mark Massara, Director of the Sierra Club's California Coastal Program. I volunteered my time to stop poorly planned development. Our successes included stopping a parking lot to be built on overwintering ground for monarch butterflies in Santa Cruz, and stopping a gate proposed to limit public access to a surf beach. On the Benmore Valley, I've removed 110 acres of conventional grapevines, completed restoration and remediation work on the riparian corridor down the center of the valley, and added conservation easement restrictions to the land.

The idea of pouring concrete and parking lots to support commercial greenhouses in the Benmore Valley disturbs me. One of the wonderful attributes of commercial outdoor cannabis cultivation is that it has a small footprint and almost no impact on the land or surrounding delicate ecology. I would like to invite all of you up there for a visit to see what a treasure the Benmore Valley is for Lake County.

I have had a meeting to discuss the issue with the Farm Bureau. The issues around cannabis cultivation in close proximity to existing agricultural crops should be addressed with smart land use policy. Nuisance smell, pesticide overspray (from traditional crops onto organic cannabis creating a liability for the conventional existing agricultural operation), and shared aquifers should all be considered as we plan to gracefully integrate cannabis into our local economy.

The issues arise around land that is intensively farmed with traditional agricultural crops, like walnuts, grapes, and pears, which are mostly in the Scotts Valley and Big Valley areas. One proposed solution is to create a 5-mile exclusionary zone around the lake where, for prime agricultural land within, there is no outdoor commercial cannabis. Within the exclusionary zone, there should be some mechanism to apply for an exception based on the distance to existing crops.

Other solutions could be requiring large setbacks to existing crops, or, site specific mitigations as a condition of approval for the major use permits required for commercial cannabis cultivation. At that time, neighboring land owners can work with staff and the applicant to find win-win solutions.

Clustering the density of the cultivation sites on large properties with many parcels under common ownership makes sense. It's better for the environment, and easier on enforcement staff to make monitoring visits.

Co-location across ownerships is a smart strategy, implemented in other counties, to enable small farmers to continue operating without having scattered small grow sites throughout the county. Local cooperatives, where the small farmers can consolidate their production and distribution, and have access to resources to become compliant, are essential for a cohesive community.

Sincerely,

Robert Adelman

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