

RE: Monofilament netting for Cannabis Cultivation

From Kamoroff, Corrina@Wildlife < Corrina.Kamoroff@Wildlife.ca.gov>

Date Tue 10/1/2024 4:45 PM

To Slavey, Collin <cslavey@co.humboldt.ca.us>

Cc Manthorne, David@Wildlife <David.Manthorne@wildlife.ca.gov>; Johnson, Cliff <CJohnson@co.humboldt.ca.us>; Bocast, Kalyn@Wildlife <Kalyn.Bocast@Wildlife.ca.gov>; Bauer, Scott@Wildlife <Scott.Bauer@wildlife.ca.gov>

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Good Afternoon.

Please see the comments below regarding the use of monofilament netting in cannabis cultivation.

The use of monofilament (synthetic) netting (trellis) at cannabis cultivation sites poses a significant adverse effect on biological resources. Specifically, the California Department of Fish and Wildlife (CDFW) and others have made numerous observations where wildlife is entrapped, harmed, and/or killed in monofilament netting. Additionally, improper disposal of cut-up monofilament netting is frequently observed scattered throughout cultivation sites and surrounding areas, resulting in litter hazardous to wildlife.

Through observations and conversations with cannabis cultivators on legal sites, it has been noted that trellis netting is typically cut-up into small pieces and discarded with the unused parts of the plant. Removing monofilament trellis from budded plants is labor intensive and infrequently done, making this monofilament netting a constant source of waste from cultivation sites. Many cannabis cultivators operate in rural areas where waste disposal options are limited and distantly located, making it difficult for cultivators to properly dispose of plastic waste. The disorderly use of synthetic trellis, coupled with the rural setting of Humboldt County has led to the improper management and disposal of this material, resulting in ongoing threats to wildlife and their habitat.

The following represent general avoidance and minimization measures recommended by CDFW for cannabis cultivation in Humboldt County relating to the use of monofilament netting. To minimize the risk of ensnaring and strangling wildlife as well as minimizing plastic waste associated with cannabis cultivation, cannabis cultivators shall not use synthetic (e.g., plastic or nylon) monofilament netting materials for trellising, erosion control, or any cannabis cultivation activities. This prohibition includes photo- or bio-degradable plastic netting. Recommended alternatives include geotextiles, fiber rolls, and other materials made of loose-weave mesh (e.g., jute, coconut (coir) fiber, or from other products without welded weaves). Other alternatives include wooden trellis, metal trellis, tomato cages, tomato clips, and bamboo stalking.

Thank you,

From: Slavey, Collin <cslavey@co.humboldt.ca.us> Sent: Monday, September 23, 2024 4:05 PM **To:** Manthorne, David@Wildlife <David.Manthorne@wildlife.ca.gov>; Kamoroff, Corrina@Wildlife

<Corrina.Kamoroff@Wildlife.ca.gov>

Subject: Monofilament netting for Cannabis Cultivation

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Hello there, good afternoon,

I am looking for comments on the use of Monofilament netting for cannabis cultivation. I have been tasked with writing a memo to the Planning Commission on the topic, providing for an opportunity to discuss the County's policy on the issue to suggest alternatives to our current method of regulating it through conditions of approval. The scope of the memo is the Condition of Approval applied to discretionary projects restricting monofilament, suggestions for alternatives enabling cultivators use the material while also taking measures to protect the environment from pollution, and reviewing evidence of suitable alternatives and well-managed use / mismanaged use. If you would like to submit public comment regarding the subject, feel free to send it to me. The goal is to present to Planning Commission on 10/3/2024.

I have the document previously sent to the county to support the restriction, but it would be appreciated if you could suggest best management practices in the circumstance monofilament were used.

Thank you,

Collin Slavey



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