

From: [Noel Manners](#)
To: [CannabisWR](#)
Subject: Suggestions from an Organic/ Biodynamic diversified farmer
Date: Tuesday, August 30, 2016 12:27:27 PM

To whom it may concern,

I'll cut to the chase; Cultivation area should be measured by canopy rather than the fence perimeter. There are computer programs used for this purpose in the forestry industry. My nephew showed me an app called "Canapeo" that he uses on his diversified farm in Yolo County to assess canopy coverage.

If Cannabis farms are to be measured by fence perimeter it requires that the farmer engage in an intensive agriculture model that is counterproductive to the goals of reducing farm runoff and species diversity.

Our farm has a permit to grow 99 plants, not to exceed 10,000 sq. feet of canopy, under Mendocino County's urgency ordinance. The fence at this garden encloses 3 1/2 acres including native oaks, fruit trees and vegetable beds. There are no runoffs from this garden area.

If water board regulations were interpreted to mean a 10,000 sq. foot fenced area, it would encourage a "dozer grow" which would remove native trees, and there would be no adequate buffer area between plants to absorb any runoffs.

I hope that the water board will consider this common sense approach to the square footage issue.

Kind regards,
Noel Manners
Mendocino County farmer