



December 10, 2014

Dear Supervisors,

On behalf of our members in Butte county, California NORML objects strenuously to Butte county's requirement that medical marijuana be cultivated in a contiguous space, and to the proposed "Stay in the Box" campaign advanced by the Butte County Sheriffs to ensure compliance with this scheme.

Cal NORML is in favor of using square footage of PLANT CANOPY rather than plant numbers as a scientific measure of crop yield, as determined by DEA studies. The proper way to measure square footage, as clearly presented by expert witness Chris Conrad on page 11 of his booklet "Cannabis Yields and Dosage" <http://www.chrisconrad.com/pdf/cannayieldsdosage10.pdf> is to measure each plant's diameter and then apply the simple formula we all learned in school of pi (3.14) times the radius squared. (The radius, for those who need an extra reminder, is half the diameter.)

To force plants to grow in some imaginary box, crammed together, is a recipe for disaster. It will increase the likelihood of disease (molds, mildews, insects), making for an unhealthy product. Many patients, especially AIDS patients, have compromised immune systems and are especially susceptible to molds in particular. Furthermore, growing this way will interfere with a patient harvesting their required amount of cannabis. The DEA calculated that 100 square feet of plant canopy will yield approximately three pounds of usable marijuana flowers, which is an adequate yearly amount for most patients; however a garden grown in a 10 x 10 contiguous space will likely yield much less and leave patients without the medicine their doctors have recommended.

The federal IND program, which supplies patients with government-grown marijuana, provides upwards of six pounds yearly to patients. The Argument in Favor of Measure A in the ballot pamphlet, signed by Supervisor Kirk and DA Ramsey, says Measure A "does NOT affect patient access to medical marijuana." One of the speakers at yesterday's meeting seemed to say the Glenn

county had the same ordinance; however I see nothing in their county code about requiring contiguous cultivation.

To make “Stay in the Box” the cornerstone of your enforcement is backwards thinking. I understand you feel the need to tighten up on your enforcement, but I don’t think your goals will be obstructed by simply having your officers walk around a garden and do a little math, instead of just measuring a “box.” Although the voters approved the ordinance, I spent time in your county during the campaign and I did not see that the “box” was an issue at all during the campaign. Rather, the message was drummed out again and again that Measure A, unlike Measure B, allowed the supervisors to alter the ordinance as needed.

As far as I understand state law, this budget allocation won’t go into effect until the board takes a second vote on it. I urge you to reconsider this ill-advised ordinance and foolish campaign to promote and enforce it in Butte County.

Please think about what services you will have to cut in order to advertise and enforce this law. The answer to this problem will require thinking outside the box, not trying to stuff ourselves into outmoded, unscientific, and unjust ways of thinking. There are many other problems with the ordinance, namely disallowing collective cultivation and personal cultivation in apartments, that I hope can also be addressed in the future.

Sincerely,

Ellen Komp  
Deputy Director  
California NORML