

From: [ETA Humboldt](#)
To: [Slavey, Collin](#); [Dorris, Joshua](#)
Subject: BMPS for Monofilament Netting for Cultivation Use
Date: Thursday, October 17, 2024 12:36:31 PM
Attachments: [BMPs for Plastic Netting PROPOSAL.pdf](#)

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Hi Collin and Joshua,

I hope you are both doing well. I am writing to you today because we have been informed that a discussion about the use of Monofilament netting is coming up on the agenda of the November 7th Planning Commission hearing. As you know, we at ETA represent multiple clients with cultivation permits in Humboldt County. In the years that we have been representing our clients, we have noticed that whether or not use of Monofilament netting is allowed to be used as a cultivation material varies permit to permit and planner to planner.

As an example, one of our clients has nine cultivation permits. He is allowed to use the monofilament netting on five of his farms, but is banned from using it on the other four. These permits have been approved over the years from 2018-2022. The staff reports and conditions were written by multiple different planners, and each permit reads differently, leading to confusion on the part of the permit holder. It does not seem to matter what year the permit was approved, as the first permit and the last approved permit are both allowed to use the netting, while a few in the middle are not.

We at ETA believe that if best management practices are implemented and maintained, Monofilament netting is an asset to cultivators. There is no available suitable alternative, as Jute and other products are made with porous materials that absorb moisture and lead to mold and mildew issues wherever it touches the plant.

We are excited to attend this hearing and discuss the possibility of allowing the use of Monofilament Netting as a cultivation material across all permits as long as Best Management Practices are implemented and maintained. As such, we have developed the attached Best Management Practices for the use of Plastic Trellis Netting (PTN) for cultivation use. We agree that monofilament netting should never be used as an erosion control material as it presents a clear and present danger to wildlife when on the ground.

These BMPs outline how monofilament netting should be used, stored and disposed of properly. We have prepared substantial conformance documents for our clients/permits that are currently banned from using the monofilament netting as a cultivation material, and are hopeful that we will be able to submit those for approval should there be a favorable outcome of this hearing.

We look forward to your feedback on our BMPs after you've had a chance to review, and we appreciate the opportunity to have this important discussion. Thank you for your time.

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