The threat of wildfire to cannabis agriculture in California Christopher Dillis^{1*}, Van Butsic¹, Diana Moanga¹, Phoebe Parker-Shames¹, Ariani Wartenberg¹, Theodore Grantham¹ ¹University of California Berkeley, Berkeley, California, United States of America *Corresponding author Email: cdillis@berkeley.edu NOTE: This manuscript is a non-peer reviewed preprint, submitted to EarthArXiv

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23 Abstract

24 At the intersection of climate change and rural development, wildfire has emerged as a threat to 25 agriculture in the western United States. This nexus is particularly problematic for the rapidly developing 26 cannabis industry in California, which includes farms located outside of traditional agricultural zones and 27 within landscapes potentially more prone to wildfire. Using fire hazard severity metrics, current and 28 historical wildfire perimeter data, and future burn regime projections, we compared the location of 29 licensed cannabis farms in California to other agricultural types, to determine if cannabis is uniquely 30 vulnerable to wildfire. We found that cannabis farming was located closer to wildfire perimeters and 31 more often in high fire hazard severity zones than other agriculture. Over the last 50 years, the distance 32 between cannabis farm locations and fire perimeters decreased significantly, and projected burn 33 regimes for the remainder of the century place cannabis farms at greater risk than other agricultural 34 types. Our findings highlight cannabis' particular vulnerability to wildfire in California. In light of the 35 sector's growing importance in the state, and given potentially direct and indirect consequences (e.g., 36 human health risks, socioeconomic impacts), these risks should be considered for the development of 37 future cannabis and rural development policies.

38

39 1. Introduction

Wildfire is becoming a global threat, compounded by climate change (Westerling et al, 2006)
and the expansion of human development in fire prone areas (Radeloff et al., 2018). The threat of
wildfire is particularly prominent in California, where the combination of prolonged drought, arid
vegetation, climate change, historical fire suppression, and development in the wild-urban interface
(WUI) is leading to more frequent and severe wildfires statewide (van Wagtendonk et al, 2021, Williams
et al, 2019; Keeley & Syphard, 2018; Kramer et al., 2018; Parks et al., 2015; Radeloff et al., 2018; Syphard

et al., 2007; Norgaard, 2014). Over the last five years, California has experienced its seven largest
wildfires on record (CAL FIRE, 2020a) and current projections for the state suggest an increase in
frequency and intensity of wildfires in the future (Westerling, 2018; Goss et al., 2020). As a result,
wildfire is expected to continue to generate large social, economic, and ecological costs in the state (Jin
et al., 2015; Kelly et al., 2020).

51 Wildfire has the strongest impacts on rural and agricultural communities that occupy fire-prone 52 areas of the landscape. This is especially true for California's ranching communities that rely on arid 53 rangelands, where wildfires disrupt operations and cause livestock losses each year (Bell 2015; 54 Herskovitz 2017). Other agricultural activities, such as wine grape cultivation, also occur in areas of the 55 landscape where wildfire may directly threaten vineyards, negatively impact wine quality through 56 smoke damage, and discourage tourism (Thach and Eyler, 2017; Bauman et al., 2020). Cannabis 57 cultivation, which is a rapidly growing segment of California's agricultural sector (Hudock 2019), may 58 face similar risks as rangelands and vineyards. Cannabis has historically been grown in rugged terrain, in 59 remote parts of the state away from population centers, as a result of its historical prohibition (Corva, 60 2014; Butsic et al., 2018). Additionally, the recent rapid expansion of cannabis in rural areas has 61 followed patterns of low-density development in the WUI known to exacerbate fire risk (Butsic et al., 62 2018; Radeloff et al., 2018). Despite the potential for cannabis agriculture to be uniquely vulnerable to 63 wildfire, to date, there has been no analysis of the spatial distribution of cannabis farms in relation to 64 wildfire risk and no analysis of how the threat of wildfire to cannabis differs from other agriculture 65 sectors.

The implementation of a regulated California cannabis industry in 2018 has created a pathway
for small-scale legacy farms (i.e., previously unregulated), primarily located in the historical cannabisfarming epicenter of Northern California, to transition to licensed production (Dillis et al., 2021).
Statewide expansion in production has lead to the establishment of new, larger farms outside of this

70	region, espec	ially along California's Central Coast, yet cannabis cultivation in the irrigated and less fire-		
71	prone agricul	tural lands of California's Central Valley remains largely prohibited under local ordinances		
72	(Dillis et al., 2021). Little attention has been given to how state and local policy is shaping the geograph			
73	of the cannabis industry in relation to wildfire risk. Furthermore, the consequences of growing wildfire			
74	severity on cannabis agriculture from climate change has not been considered. To fill these information			
75	gaps, we addressed the following questions:			
76	1)	Does wildfire pose a greater threat to licensed cannabis than to other forms of		
77		agriculture on a statewide and county-level basis?		
78	2)	How does the threat of wildfire vary among licensed cannabis producing counties and		
79		has the threat increased in recent years?		
80	3)	What is the projected wildfire risk to cannabis agriculture under climate change and how		
81		does it compare to other agricultural sectors?		

82 **2. Methods**

83 2.1. Data

84 License data for outdoor cannabis farms were obtained from the California Department of Food 85 and Agriculture (CFDA) via a listserv distribution on May 27, 2020. License data included parcel numbers, 86 which were matched to a county parcel layer obtained from the National Parcelmap Data Portal 87 (Boundary Solutions, 2020). Multiple licenses on a single parcel were consolidated into a single 88 observation and parcel centroids were used for all analyses. The locations of three other classes of 89 agriculture were collected from the 2019 USDA Cropland Data Layer and the 2016 National Land Cover 90 Database (USDA, 2019; Dewitz, 2019): pasture (excluding cultivated hay crops), grapes, and an 91 aggregate of remaining crop types (referred to hereafter as general crops). Both the USDA Cropland 92 Data Layer and the National Land Cover Database datasets feature nearly comprehensive mapping of 93 agriculture in California at 30 meter resolution. For our statewide analysis, we took a random sample of

94 points from within each agricultural class of interest from across the state, using an equal number of 95 points for each crop (n=2228, the number of licensed cannabis farms in our dataset) in order to provide 96 a balanced sample. For subsequent analyses restricted to cannabis producing counties, non-cannabis 97 agricultural points were resampled to once again balance those of cannabis (n= 2228) with each 98 agricultural type. Because agriculture is clustered in select counties statewide, and potentially clustered 99 within these counties as well, we used county and subwatershed (HUC12) locations as predictors in 100 mixed-effects models. County boundaries were downloaded from the California State Geoportal (State 101 of California, 2019) and subwatershed boundaries were obtained from the National Hydrography 102 Dataset (USGS 2019).

103 We assessed fire risk on the landscape by Fire Hazard Severity Zones (FHSZ), as well as historical 104 fire perimeters, obtained from the California State Geoportal on December 7, 2020. FHSZs established 105 by CAL FIRE classify terrain as moderate, high, or very high hazard severity based on factors including 106 slope, fuel, and fire weather (CAL FIRE, 2020b). Although there is a small amount of missing data in 107 Federal Responsibility Areas (e.g. National Forest) and Local Responsibility Areas (e.g. incorporated 108 townships), zones with no data are most commonly those in areas of urban development or intensive 109 irrigated agriculture, such as the Central Valley, in which wildfire is extremely unlikely. Fire perimeter 110 data for the years 1950-2020 (CAL FIRE, 2020c; 2020d) were used as an additional risk metric and were 111 screened for a minimum size of 400 ha, following Westerling (2018), to filter out small fires included in 112 the database.

To analyze future projections of fire regimes we used a dataset from Moanga et al. (2020), which was derived from Westerling (2018) projections. The estimated number of hectares burned were calculated under the RCP4.5 greenhouse gas concentration pathway (a scenario in which emission levels peak around 2040 and then gradually decline; CalAdapt, 2018). The statewide modeled wildfire activity was analyzed using the ESRI space-time mining capabilities (Space-Time Cube and Emerging Hot Spot

118 Analysis functions). Areas likely to experience high levels of wildfire activity in both space and time were 119 identified and classified into several different hot and cold spot categories based on the spatial and 120 temporal progression of modeled wildfire activity (Table 1). The Space-Time Cube and Emerging Hot 121 Spot Analysis functions were used to analyze the data in 3D across both space and time by aggregating 122 the predicted number of hectares burned into space-time bins. Modeled wildfire data provided 123 estimates of the number of hectares burned for each year between 2020 and 2100 across California 124 (area divided into 10688 grid cells - one grid cell extending approximately 6 km²). The initial wildfire 125 projection data was aggregated into space time bins so that each bin incorporated one grid cell and 126 contained modeled data for one time slice (temporal interval was set on a yearly basis to capture the 127 gradual progression of wildfire activity). In total, our analysis included 4,950,973 hectares of hot-spots 128 (76.90% of the study area) and 149,981 hectares of cold-spots (2.32% of the study area), which 129 represent predicted fire dynamics for the period analyzed (2020-2100).

130 2.2. Does wildfire pose a greater threat to legal cannabis than to other forms of agriculture 131 on a statewide basis?

132 To understand if cannabis farms were on average located closer to wildfires than other 133 agricultural types across California, we compared distance to wildfires between agricultural types, using 134 aggregated fire perimeters dating back to 1950. We used distance to fire perimeters as our main metric 135 of comparison, because neither FHSZ data nor burn probability data (from Westerling, 2018) are 136 comprehensive statewide. For each agricultural type, the distance was calculated between each data 137 point and the nearest fire perimeter. Although the majority of agricultural data points (especially those 138 of cannabis) were not contemporary with many of these fires, the perimeters instead are used herein as 139 a proxy for measuring geospatial susceptibility to wildfire. 140 We fit a multilevel model, using the Ime4 package in R Statistical Computing Software (Bates et

al 2015, R Core Team, 2018), to establish whether there was a statistically reliable difference between

142 cannabis and other agricultural types in terms of proximity to fire. Random effects were used for county 143 and subwatershed to account for nested spatial clustering of data points. Because the distribution of 144 distances was right-skewed and overdispersed, we opted to use a negative binomial model. Rather than 145 log transforming the distances prior to model fitting, the generalized linear model (GLM) used a log link 146 function, predicting the distance (\mathcal{D}_i) of each agricultural data point to the nearest wildfire perimeter, 147 using the following equation:

148

Eq. 1

149 $log(\boldsymbol{D}_i) = \boldsymbol{\alpha} + \boldsymbol{\alpha}_c + \boldsymbol{\alpha}_{wc} + \boldsymbol{\beta}_d d + \boldsymbol{\varepsilon}$

A fixed-effects term for *Agricultural Type* (β_d) is added to random intercepts for *County* (α_c) and *Watershed* (nested within County; α_{wc}) as well as the overall intercept (α). Cannabis was designated as the reference level for *Agricultural Type*, therefore producing coefficient estimates of the remaining agricultural types relative to cannabis (as the overall intercept). Model coefficients were considered reliable if 95% confidence intervals, constructed from the standard errors, did not overlap zero.

155 2.3. How does the threat of wildfire vary among legal cannabis producing counties and is the 156 threat increasing?

157 We conducted a similar analysis focusing only on cannabis producing counties, restricted to 158 those counties comprising at least 1% of all CDFA outdoor cultivation licenses statewide. These included: 159 Humboldt, Lake, Mendocino, Monterey, Nevada, San Luis Obispo, Santa Barbara, Santa Cruz, Sonoma, 160 Trinity, and Yolo Counties (Figure 1). In these counties, we compared the threat of wildfire to cannabis 161 against the remaining agricultural types (pasture, grapes, general crops) using Fire Hazard Severity Zone 162 (FHSZ) data. We also compared cannabis wildfire risk between counties using fire perimeter data. 163 In order to address whether the threat of wildfire to cannabis has changed over the preceding 164 decade, we measured the distance of licensed cannabis farms to historic perimeters of wildfires that 165 occurred between 1970 and 2020. We compared the proximity of cannabis farms to historic fire

166 perimeters in two time periods, 1970-2015 (Period: early) and 2016-2020 (Period: recent), again using a 167 multilevel negative binomial model. The model used a log link function, predicting the distance (D_i) of 168 each cannabis data point to the nearest wildfire perimeter, using the following equation: 169 Eq. 2 170 $log(\boldsymbol{D}_i) = \boldsymbol{\alpha} + \boldsymbol{\alpha}_c + \boldsymbol{\alpha}_{wc} + \boldsymbol{\beta}_p p + \boldsymbol{\varepsilon}$ 171 Fixed-effects terms for *Period* (β_p) were added to random intercepts for *County* (α_c) and *Watershed* 172 (nested within County; α_{wc}) as well as the overall intercept (α). Recent was designated as the reference 173 level for *Period*, therefore interpreting the coefficient estimate of *Period* as the difference observed in 174 Period: early relative to recent (as the overall intercept). Model coefficients were exponentiated to 175 produce estimates on the original scale of the response variable (km). The difference was considered 176 reliable if 95% confidence intervals, constructed from the standard errors, did not overlap zero. 177 178



Figure 1. Study Area Map. Wildfire perimeters from 2020 are depicted, with the perimeters of the preceding decade and historical perimeters (since 1950) included for context. Cannabis producing counties included in this analysis are restricted to those comprising at least 1% of CDFA outdoor cannabis licenses.

218 2.4. What is the projected wildfire risk to cannabis agriculture under climate change and how 219 does it compare to other agricultural sectors?

220 To assess the future threat of wildfire to licensed cannabis farms, we recorded the spatio-221 temporal burn pattern projections summarized by Moanga et al. (2020) for each agricultural data point 222 from 2020-2100. Each point location was classified based on its projected burn pattern as: 223 New/Intensifying Hot Spot, Historical/Persistent Hot Spot, Sporadic/Oscillating Hot Spot, Diminishing 224 Hot Spot, No Pattern Detected, Diminishing Cold Spot, Sporadic/Oscillating Cold Spot, 225 Historical/Persistent Cold Spot, New/Intensifying Cold Spot, or No Data (Table 1). Projected burn 226 patterns were summarized between agricultural types in cannabis producing counties, as well as 227 between cannabis producing counties, focusing exclusively on cannabis data points. Using a space-time 228 approach in analyzing modeled wildfire activity throughout the twenty-first century allowed us to take 229 into account not only the spatial, but also the temporal dynamic of predicted wildfire activity and helped 230 identify areas likely to experience different wildfire threats through time. These distinctions are 231 important in assessing not only the current wildfire risk of cannabis farms, but also evaluating how this 232 risk is predicted to evolve in the future. 233 As a final metric of the threat to cannabis posed by wildfire, we calculated the proportion of 234 cannabis farms within fire perimeters of the 2020 fire season. The proportion of cannabis farms within 235 fire perimeters was calculated for each cannabis producing county. Cannabis was also compared to the 236 remaining agricultural types, focused specifically within cannabis producing counties.

237 **3. Results**

3.1. Does wildfire pose a greater threat to legal cannabis than to other forms of agriculture on a statewide basis?

Cannabis farms were located closer to known wildfire perimeters than were any other type of agriculture (Figure 2), with a median distance of 2.81 km (IQR = 1.06,5.27) for cannabis, compared to 6.31 km for pasture (IQR= 2.96, 11.16), 11.10 km for grapes (IQR= 4.50, 21.48), and 13.28 km (IQR =



Figure 2. Farm Proximities to Known Wildfires. Perimeters for fires since 1950 are compared against the geospatial locations of (A) cannabis and sampled data points for (B) pasture, (C) grapes, and (D) general crops. Median distances for each agricultural type are indicated by a red line, with the interquartile range (IQR) represented with dashed lines on either side of the median.

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historical fire perimeters (9.89%) was higher than grapes (2.91%), pasture (1.75%), and general crops
(0.89%).

3.2. How does the threat of wildfire vary among legal cannabis producing counties and is the threat increasing?

The percentage of cannabis farming in high (43.88%) or very high FHSZs (35.25%) was also larger than any other type of agriculture found in cannabis producing counties (Figure 3). Grapes were the next most common type to occur in high (24.53%) or very high FHSZs (5.09%), followed by pasture (12.43%; 0.76%, respectively). General crops almost never occurred in high (6.83%) or very high FHSZs (0.45%). There was also a notable amount of variation in the percentage of cannabis farming within FHSZs

between counties (Figure 4). For instance, Trinity (93.44%) and Nevada (53.33%) had over half of their

276 cannabis farms in very high FHSZs, while Monterey and Yolo had almost no farms located in either high

277 (6.82%; 0.00%, respectively) or very high FHSZs (0.00%; 2.33%, respectively).

278 For all counties, the proximity of cannabis farms to historic fire perimeters has decreased over 279 time (Figure 5). The median reduction of average annual distance between early (1970-2015) and recent 280 (2016-2020) was smallest in Santa Barbara County (-3.19 km), whereas Lake County recorded the largest 281 median reduction in distance from (-43.81 km), and smallest average distance to (13.41 km) wildfire 282 within the recent period. The results of the negative binomial model indicated that, overall, the 283 proximity cannabis farms to wildfire during the recent period has reliably decreased (Intercept MLE = 284 4.20, SE= 0.05; Coefficient MLE = -0.44, SE = 0.01), corresponding to a change in average annual distance 285 from 66.37 km (95% CI = [60.43, 72.89]) to 42.94 km (95% CI = [38.82,47.51]).

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Figure 3. Fire Hazard Severity Zones by Agricultural Type. Proportions of farms of the four agricultural types within each FHSZ category are summarized, within cannabis producing counties only. FHSZs are categorized as moderate, high, and very high, with no data values resulting from areas not categorized either due to a lack of fire danger or Federal Fire Responsibility or Local Fire Responsibility zones.



Figure 4. Fire Hazard Severity Zones by County. Proportions of cannabis farms (only) within each FHSZ
 category are summarized by county. FHSZs are categorized as moderate, high, and very high, with no
 data values resulting from areas not categorized either due to a lack of fire danger or Federal Fire
 Responsibility or Local Fire Responsibility zones.



Figure 5. Annual Average Distance to Wildfire. The annual average distances between cannabis farms
and wildfire perimeters recorded in each of the 11 cannabis producing counties in two five-year periods: *Early* (2010-2014) and *Recent* (2015-2019). Raw data are plotted as bars representing median values and
dots representing the interquartile range. Results of the model predictions are overlaid in corresponding
colors, with maximum likelihood estimates displayed as a horizontal line, bracketed by dashed lines
depicting the 95% confidence interval of the MLE.

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314 **3.3.** What is the projected wildfire risk to cannabis agriculture under climate change and how 315 does it compare to other agricultural sectors?

Cannabis was the only agricultural type with over 75% of farms (84.67%) located in areas projected as New/Intensifying, Historical/Persistent, or Sporadic/Oscillating Hot Spots for the prediction period 2020-2100. The only other agricultural type to exceed 50% in these classifications was grapes (60.79%), while the occurrence of pasture (42.41%) and general crops (24.39%) in these areas was much lower. Among cannabis producing counties, seven of 11 had 75% or more of cannabis farms located in
zones projected as New/Intensifying, Historical/Persistent, or Sporadic/Oscillating Hot Spots (Santa
Barbara: 97.22%, San Luis Obispo: 77.27%, Trinity: 100%, Mendocino: 98.55%, Monterey: 75%, Lake:
100%, and Nevada: 97.33%). There were three counties in which over half of the cannabis farms were
specifically within zones projected as New/Intensifying Hot Spots (Santa Barbara: 95.83%, Trinity:
61.64%, and San Luis Obispo: 63.64%).

The percentage of cannabis farms located within fire perimeters in 2020 was higher than those of any other agricultural crop: (0.63%) or 14 out of 2,228 CDFA licensed farms. The number of sampled grape data points was even lower (6 out of 2,228; 0.026%) and no sampled points for pasture or general crops were located within fire perimeters in 2020. Of the cannabis farms within 2020 fire perimeters, eight were in Mendocino County (1.29% of county farms), three were in Trinity County (0.98% of county farms), two were in Sonoma County (4.44% of county farms), and one was in Santa Cruz County (4.00% of farms).



Figure 6. Projected Burn Regimes by Agricultural Type. Proportions of farms of the four agricultural
types within each projected burn pattern category are summarized, within cannabis producing counties
only. Categories are adapted from those used by Moanga et. al (2020). No data values result from areas
for which burn probability data from Westerling (2018) were not produced due to extremely low
likelihood of wildfire.





361 **4. Discussion**

362 Global increases in the severity and occurrence of wildfires, driven by climate change and other 363 anthropogenic factors (Liu et al. 2010), are particularly evident in drought-stressed regions such as 364 California. Our spatial analysis of statewide wildfire risk in California suggests that cannabis agriculture is 365 uniquely vulnerable to wildfire impacts relative to other crops. At the statewide scale, cannabis farms 366 are on average located within 3km of a past wildfire, whereas pasture is located over twice as far, 367 grapes three times as far, and general crops are located over four times as far from wildfires. 368 Furthermore, although the statewide distribution of cannabis agriculture is largely confined to a handful 369 of relatively fire-prone counties, the distribution of cannabis farms within these counties is still closer to 370 historic wildfire perimeters, and more likely to be found in high fire hazard severity zones, than are all 371 other agricultural types. Our results further suggest an alarming trend of increasing fire risks to cannabis 372 in the future. The wildfire risk for cannabis increased markedly during the five year period from 2015-373 2020 compared to the preceding 45 years. Overall, we estimated that the distance between cannabis 374 farms and fire perimeters has shrunk by 36% during this time period. Likewise, using data on projected 375 burn regimes, we found that a disproportionate number of cannabis farms are located in wildfire 376 hotspots under future climate scenarios.

377 **4.1. Geography of Cannabis in California May Exacerbate Threat from Wildfire**

The geography of cannabis farming is distinct from that of other agricultural types, as a result of both variability in county-level regulations and the illicit history of the crop (Dillis et al., 2021). Although the cannabis industry continues to expand in California, the current distribution of farms is still heavily biased toward its historical origins in the northern part of the state. Establishment of the early cannabis industry in this region was partially driven by the desire to grow undetected, leading growers to locate in remote, hilly, fire prone areas (Corva, 2014; Butsic and Brenner, 2016). As farmers have entered the legal market, many remain in these remote areas, given that their farms are already established. While these small farms vastly outnumber their counterparts elsewhere in the state, the majority of legal cannabis production has already shifted to the Central Coast, where farms are less numerous, but orders of magnitude larger (Dillis et al., 2021). Unfortunately, the future wildfire outlook for the Central Coast also poses a concern in that all three top cannabis producing counties in this region have more than half of their farms in zones projected as persistent, new, or intensifying wildfire hotspots. In fact, over 95% of its cannabis farms in Santa Barbara County, which is now the top cannabis producing county in the state, are located in new or intensifying hot spot zones.

392 It is worth noting the counties that produce the vast majority of the state's irrigated agricultural 393 crops are located in the Central Valley and are generally considered to have very low wildfire risk. 394 However, aside from Yolo County, every county in the valley has continued to prohibit cannabis 395 agriculture through local ordinances. As a consequence, many areas suitable for cannabis cultivation 396 that have lower fire risk are currently inaccessible. Future changes in policy that allow for cultivation 397 within these counties may significantly lower the overall wildfire risk to cannabis in the state. Within 398 current cannabis producing counties, many land use policies have encouraged production on lands 399 already used for agriculture. To the extent that these lands have less exposure to wildfire, it is possible 400 that newly establishing farms may have lower fire risk. As an example, Monterey and Trinity Counties 401 have both experienced an exceptional amount of wildfire since 2015 (covering 16% and 33% of their 402 land areas, respectively), yet the latter has over 90% of its cannabis farms in very high fire hazard 403 severity zones, while the former has none. This is largely because cannabis farming in Monterey County 404 is new and confined to agricultural zones, while production in Trinity County is still located in remote 405 legacy areas and there is relatively little agricultural land throughout the county in general.

406 **4.2.** Cascading impacts of wildfire on the cannabis industry

407 Although the number of cannabis farms that were directly damaged by wildfire in 2020 (i.e.,
408 inside fire perimeters) is small (0.63%), a much larger proportion of farms were likely affected by their

409 close proximity to fire, and experienced impacts from smoke exposure or infrastructure damage (e.g., 410 power and water systems). It is unknown what proportion of farms experienced crop damage or losses 411 from wildfire smoke. While the adverse effects of wildfire smoke on the chemical composition and 412 quality of wine grapes ("smoke taint") is well documented and known to cause significant economic 413 impacts (e.g., (e.g., Krstic et al., 2015), the effects of smoke on the quality of cannabis products is less 414 well understood (but see Kukura, 2020; Schiller, 2020).

415 Wildfire smoke may also have additional implications for human health. Outdoor farm workers, 416 including for cannabis, may be particularly vulnerable to smoke exposure and health risks from the 417 inhalation of particulate matter from wildfire smoke (Riden et al., 2021), including severe respiratory 418 and cardiovascular damage (Cascio et al., 2018). Farmworker health and safety may also be impacted by 419 additional exposure to toxic particles from combusted building structures or chemicals found on site, 420 including pesticides, as well as flame retardants used to suppress wildfires (e.g., Riden et al. 2021). There 421 are also no publicly available data on the capacity for these chemical compounds, or the natural 422 byproducts of wildfire smoke, to impact the safety of cannabis licensed for human consumption. Given 423 California's stringent testing requirements for cannabis flower, the effects of wildfire smoke add further 424 uncertainty to newly established testing protocols and there is no publicly available guidance on 425 potential mitigation measures. Finally, the federally illegal status of cannabis has made crop insurance 426 largely unavailable to cannabis farmers, thus increasing financial exposure should crops be either 427 burned or rendered unmarketable as a result of smoke damage.

An economic analysis of the potential impact of wildfire on the cannabis industry would be helpful in understanding the scale of the risk and informing needed policy changes. With 2019 sales near \$3 billion (McGreevy, 2019), cannabis is already one of the top five grossing agricultural sectors in California (State of California, 2020), with rapid growth expected in the coming decade (Hudock, 2019). In 2020, tax revenues from legal cannabis sales in the state amounted to over \$780 million (State of California, 2021). Considering cannabis' increasing economic importance at state- and county-levels,
crop losses from wildfire are likely to have critical economic impacts, particularly in rural communities
with a higher direct social and economic dependence on cannabis agriculture (Kelly & Formosa 2020).
This could also disproportionately impact already marginalized small-scale cannabis farmers who may
not have resources to recover from wildfire-related losses.

438 **4.3.** Conclusions

439 Cannabis is unique among agricultural sectors both in the threat of exposure to wildfire and the 440 prospect of uninsurable crop losses. The geographic legacy of cannabis production in Northern California 441 and expansion of the regulated industry in the Central Coast has rendered it more vulnerable than other 442 types of agriculture, compounded by the regulatory exclusion of cannabis farms from traditional 443 agricultural regions in the Central Valley with relatively lower fire risk. If production is confined to 444 current counties, local regulations should encourage new farming in areas that are less prone to wildfire, 445 yet remain inclusive of existing cannabis farms. For instance, fire-safety programs for farms already 446 established in high-risk areas are needed to reduce the risks of wildfire to crops and human health. The 447 state should also pursue options for providing crop insurance to farmers that aren't eligible for federal 448 programs. Furthermore, given that the impacts of wildfire extend beyond fire perimeters, research on 449 smoke exposure risks for cannabis crops and farm workers is an urgent priority. Collectively, these steps 450 will help bolster the resilience of the developing regulated cannabis industry with respect to wildfire. 451 The impacts of wildfire on cannabis farming may be particularly severe, but serves more generally as an 452 example of the vulnerability of rural agriculture, and its dependent communities, in the face of climate 453 change and the consequent increase in natural disasters such as wildfire.

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610 Tables

Table 1. Descriptions of projected burn patterns adapted from ESRI (2016). Aggregates of

individual burn patterns are indicated by horizontal lines. Each description of a hot spot

pattern also applies to an equivalent description of a cold spot pattern.

Burn Pattern	Description			
New Hot Spot	A location that is a statistically significant hot spot for the final time step and has never been a statistically significant hot spot before.			
Intensifying Hot Spot	A location that has been a statistically significant hot spot for 90% of the time-step intervals, with the intensity of clustering increasing overall and that increase is statistically significant.			
Historical Hot Spot	The most recent time period is not hot, but at least 90% of the time- step intervals have been statistically significant hot spots.			
Persistent Hot Spot	A location that has been a statistically significant hot spot for 90% of the time-step intervals with no discernible trend indicating an increase or decrease in the intensity of clustering over time.			
Sporadic Hot Spot	A location that is an on-again then off-again hot spot. Less than 90% of the time-step intervals have been statistically significant hot spots and none of the time-step intervals have been statistically significant cold spots.			
Oscillating Hot Spot	A statistically significant hot spot for the final time-step interval that has a history of also being a statistically significant cold spot during a prior time step. Less than 90% of the time-step intervals have been statistically significant hot spots.			
Diminishing Hot Spot	A location that has been a statistically significant hot spot for 90% of the time-step intervals, with the intensity of clustering decreasing overall and that decrease is statistically significant.			
No Pattern Detected	Does not fall into any of the hot or cold spot patterns.			

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Table 2. Model coefficients. Results of negative binomial model predicting distance to known wildfire perimeter. Maximum Likelihood Estimates (MLE) and standard errors are provided along with the predicted estimate on the original scale (OSE).

Coefficient	MLE	Std. Error	OSE
Intercept (Cannabis)	1.46	0.11	4.30 km
Grapes	0.11	0.03	4.82 km
Pasture	0.14	0.03	4.96 km
General Crops	0.14	0.03	4.95 km