

HUMBOLDT COUNTY GROWERS ALLIANCE

February 8, 2021

Dear Humboldt County Supervisors,

Please accept the following letter on behalf of the Humboldt County Growers Alliance on Item I2 regarding industrial hemp in Humboldt.

HCGA is the voice of Humboldt County's legal cannabis industry, representing more than 250 responsible plant-touching cannabis businesses in Humboldt County. Built on a foundation of fifty years of experience and innovation, HCGA members are statewide leaders for environmentally and ethically produced cannabis who are working together to preserve, protect, and enhance Humboldt County's world-renowned cannabis industry.

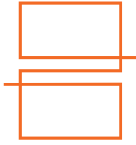
HCGA supports staff's recommendation to place a permanent moratorium on hemp in the county, and believes the staff report has accurately captured many of the key reasons for the importance of this moratorium, including concerns regarding the cross-pollination of cannabis crops and the introduction of novel pests and pathogens.

We would like to thank staff, the Planning Commission, and the Board for over two years of extensive analysis, town hall public discussion, and deliberation on the potential impacts of hemp in Humboldt County. This extensive process reflects the rapidly-evolving complexities associated with hemp policy, science, and economics at the local, state, and federal level, and the importance of this policy for the future of Humboldt County, including Humboldt's cannabis industry and the health of our environment.

For a more detailed review of these issues, we have attached HCGA's 2019 letters to the Planning Commission and Board of Supervisors regarding the hemp ordinance proposed at that time. While there have been some additional developments over the past year and a half, the issues outlined in these letters remain substantially the same.

For example, these letters rebut the frequent claim that industrial hemp poses no risk of cross-pollination so long as hemp is required to be feminized. To the contrary, the documented instability of hemp genetics as well as the typically industrial scale of hemp cultivation has led to catastrophic cross-pollination in Oregon, Washington, Colorado, and elsewhere despite claims of "feminized seeds" and even the imposition of required buffer zones between hemp and cannabis.

Considering the significant risks that hemp poses to the regulated cannabis industry, we agree with staff that the strongest rationale for allowing hemp in Humboldt County has been the



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potential to provide economic opportunity for small legacy farmers who have not entered the regulated cannabis framework. We also agree with staff that the recently-adopted 2,000 square foot ordinance, which provides reduced barriers to entry for cottage farms seeking to enter the cannabis market, constitutes a more effective approach to establishing an economically viable pathway forward for small farms.

In our view, industrial hemp is unlikely to offer significant economic opportunity for small Humboldt farmers for several reasons which are outlined in greater detail in the attached 2019 letters. These include requirements in state law that hemp cultivation must take place on at least one-tenth of an acre; the collapsing market for hemp CBD in light of mass overproduction; uncertainty associated with the legality and regulation of CBD hemp products at the state and federal level; and the difficulty of effectively regulating hemp from an environmental perspective without access to the state laws that govern pesticides, water, and land use impact in cannabis.

Hemp and cannabis are fundamentally the same plant, and Humboldt County has already established a robust ordinance, based on years of public discussion, to regulate this plant. Discussions about how to improve this framework and reduce barriers to entry should take place within this cannabis ordinance, and not within a framework that artificially separates out hemp based on the presence or absence of THC.

We appreciate the Board's attention to this important issue.

Thank you,
Ross Gordon
Policy Director
Humboldt County Growers Alliance