



Mendocino County Board of Supervisors
501 Low Gap Road
Ukiah, CA 95482

October 16, 2020

Re: Agenda Item 5c, Hemp Pilot Program-

Discussion and Possible Action Including Introduction and Waive First Reading of an Ordinance Adding Chapter 10A.18- Industrial Hemp Cultivation Pilot Program to the Mendocino County Code (Sponsors: Agriculture and County Counsel)

Honorable Supervisors,

Mendocino Cannabis Alliance reiterates the points made in its two prior memos submitted concerning this program (3/22/20 and 10/06/20) and specifically requests that Board NOT take action on this item until the Agriculture Commissioner has reconvened the stakeholder group previously engaged in this matter in order to flush out critical remaining issues:

- a) A more detailed distinction between requirements of the ordinance, the “regulations” and the Best Management Practices; more specific;
- b) Specific recommendations to the Board concerning buffer distances;
- c) Specific recommendations concerning acreage minimums and zoning allowed for the pilot program in conjunction with item d), below;
- d) Specific recommendations concerning hemp cultivation maximums in relation to items b, c, and d, above.
- e) Specific recommendations regarding testing both for proper THC content levels to allow the cultivated cannabis to qualify as hemp under federal regulations and to ensure public safety regarding pesticides, contaminants, and other items screened for under state cannabis regulations.
- f) Specific recommendations concerning whether organic methods must be adhered to by hemp cultivators or whether other restrictions concerning cultivation methods are necessary to protect cannabis crops given the strict testing requirements of permitted cannabis and the potential for contamination.

In addition, we request the matter not be continued until the Agriculture Department submits a work plan that specifies how it will accomplish the detailed and intensive inspections required by the ordinance and which are necessary to protect permitted cannabis crops.

Permitted cannabis is on-track to bring in \$5.8 million this year. Any enactment of a Hemp Program MUST be especially protective of that important economic sector. Additionally, the Board should bring forth a minimum Hemp Tax ordinance BEFORE it passes a Hemp Program, as it did with the Cannabis Tax which was passed BEFORE cannabis was permitted.

If Hemp is not strictly regulated to protect the lawful existing cannabis industry, the county is likely to see a mass exodus of cannabis cultivators and would likely minimize the chances that cannabis cultivators will endure the lengthy and expensive discretionary use process now proposed for Phase 3 expansion and new cultivation.

Thank you for your consideration.

Mendocino Cannabis Alliance