



Re: Agenda Item 5c Hemp Pilot Program

October 19, 2020

Dear Chair Haschak & Members of the Board;

We appreciate the Board's well-intentioned effort to explore the emerging industrial hemp industry. When this topic came before you last year, we spoke in favor of entertaining a hemp pilot program. We wanted to support the end of prohibition for this plant, and keep the door open for all cultivation options. Since then, we have explored industrial hemp farming, and our research has led us to change our position. We join other industry voices in strongly opposing the launch of this pilot program. We believe this would be a huge step backward to make Mendocino a "guinea pig" for a dangerous experiment while we are still in the early stages of developing a viable local cannabis industry in Mendocino.

Here's why this is a huge gamble, from a farming perspective:

- **There's too much we still don't know.** The industrial hemp and cannabis industries have never coexisted for a long enough period to provide definitive research on important factors such as pollen drift. We don't have a large enough sample size to draw from, nor do we have sample regulations from other counties or states that have successfully curbed cross-contamination. What we do know, is that the potential risks of crop damage are too high to gamble.
- **Hemp has to be produced on a massive scale to be profitable.** The need for thousands of acres disproportionately endangers THC cannabis cultivation. The pilot program will not be representative of the actual risk presented to opening up the path for industrial hemp; your pilot won't represent the realities and scale of how it will be farmed. *Scale* is the reason why hemp could potentially devastate the THC cannabis industry.

- **Success in Industrial Hemp requires seeds.** In order to be successful in hemp at scale, you need to direct seed because clones are very expensive. While you may require clones in writing, this will be very hard - if not impossible - to monitor and enforce in practice, especially for an Ag Department that is not yet familiar with the crop.
- **You can't guarantee crop safety and we can't protect against it.** Effective regulation and enforcement mechanisms have not been defined or developed, and are not even well understood at this point. This positions us to be the petri dish for experimentation, at the cost of Mendocino's legacy cannabis farmers. Thanks to continued Federal prohibition we can't get crop protection until our flower is cut and dried, which leaves cannabis farmers exposed to all the risk without any insurance.

Is this a risk that Mendocino County can afford to take? We don't think so. We ask you to consider your legacy farmers and put the pilot program on hold until this issue is rigorously understood from every angle.

Sincerely,

Jamie Warm, Co-Founder
Joshua Keats, Co-Founder