



To: Mendocino County Board of Supervisors  
Re: Agenda Item 5c

October 19, 2020

LEEF Organics is a globally distributed hemp-derived CBD line. As a company that operates in both the cannabis and hemp industries, with 50% of our business in hemp, we are in a unique position to comment on the decisions being made in Mendocino.

Based on our experience and knowledge, we strongly oppose Hemp Cultivation in the County of Mendocino. This is not the place for it.

We have experience growing and buying hemp in other states and California counties, and we have watched the hemp market collapse because of the low cost of entry and loose regulation.

It doesn't make sense to jeopardize a high-value cannabis crop which is bringing much-needed tax revenue to the county, by allowing hemp cultivation which can cause many issues including cross-pollination and pesticide drift.

What we've seen in other states where we do business like Oregon and Washington, is that allowing cannabis and hemp to coexist without proper monitoring and ag knowledge, actually increases the risk of gray area practices and black market diversion, which the county needs to be prepared to address. We have witnessed cultivators cultivate high THC plants, disguised as hemp due to the lack of regulatory teeth in "hemp" licensing.

Although we're opposed to it, we understand that if the county doesn't restrict it the moratorium could be lifted without any restrictions in place, opening us up for unregulated hemp cultivation. Ideally, we would like to see industrial hemp in Mendocino held to all of the same standards as cannabis farming such as water board requirements, and pesticide guidelines to help protect our county's natural resources.

At minimum, we would ask that the County consider three crucial points if you do move forward with a Hemp Program:

1. Demonstrate that you can **enforce** the exclusive use of clones. It is well understood that seeds present a huge threat to cannabis cultivation and mechanisms must be in place to monitor and enforce the exclusive use of clones.
2. Charge **full cost recovery** to cover ongoing inspections and monitoring for each hemp farm by County Ag Staff.
3. Mandate **Pre-Harvest Testing**: Like is being done in San Diego County, hemp farmers should be required to report their harvest date within 7 business days of harvest, and a county employee be mandated to test the flower (excluding stalk & stems of the plant) before harvest, at the expense of the cultivator to ensure that THC levels don't exceed 0.3%, as the legal limit in Farm Bill.

Thank you for your consideration,

Micah Anderson, CEO