



March 23, 2020

Re: *Mendocino County Board of Supervisor Meeting 3/24/20*
Agenda Item: 5b

Dear Honorable Board of Supervisors,

CCAG would like to thank the county for taking responsible safety measures in response to the COVID-19 virus that has impacted over 370,000 people across the globe. We are in a time of uncertainty and we commend our local government for all their efforts to keep Mendocino County safe.

We appreciate that the county BOS meetings will not be in person at this time, as a precautionary step to protect everyone's health and safety. However, we are concerned about how the public will be able to interact with live meetings and how they can still participate in providing public comment during agenda items when public comment is normally allowed during the meeting. We hope the county can offer a way for the public to engage through the use of ZOOM or some other virtual online platform, that way each supervisor can receive input from their constituents in real time for consideration before voting on agenda items.

Given the controversial nature of allowing hemp cultivation in our county, CCAG would like to request that Agenda Item 5b be postponed to a later date when the public can be present to offer insight and input during the discussion. This agenda item needs meaningful conversation between staff, experts and the public at a time when everyone can meet in person. We have also provided comments to the agenda item below for consideration.

Agenda Item 5b: *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)

After careful review of all the documents provided, the Covelo Cannabis Advocacy Group is not in support of allowing a Hemp Pilot Program to be adopted at this time.

One of the main concerns is that there is no way to guarantee that cross pollination will not occur even if applicants are required to only use feminized clones. Feminized plants can and DO turn hermaphrodite and can create a single branch that expresses male genetics. We must never underestimate the power of nature.

We appreciate that the pilot program would require weekly county inspections when the plants go into the flowering stage, but how many hours is an inspector going to physically spend on site looking for issues? Things can change in a matter of days and weekly inspections will not be able to provide a 100% guarantee. It will also require that the inspector have experience in cannabis cultivation with the knowledge of what to look for in order for it to have any merit. Since the outdoor growing season would be the same for all producers, there is a high chance each hemp cultivator would need to be inspected around the same time. How would the county be able to deal with this overlap and have enough staff to cover each farm?

The proposed pilot program makes no mention of the size allowance for hemp cultivation, only to state that an applicant must have 10 acres of land or more. If hemp cultivators are allowed an unlimited footprint, will the county Ag department have the resources and the staff time to be able to conduct inspections on multiple acre sites? This must be considered.

Just for reference, it takes hours to inspect a 2500 sq ft cannabis garden for hermaphrodite tendencies thoroughly because male branches can be hidden within the plants. If acres of hemp were allowed in the pilot program, it would be physically impossible for one inspector to look over every plant branch on every plant in one day.

Hemp comes from the cannabis plant. How can it be stated that growing unlimited amounts of hemp has no environmental impacts and therefore does not require a CEQA analysis but cannabis cultivation is different? This is a double standard that must be acknowledged.

There is no denying that hemp will need water to grow. How will multi-acre farming operations impact our water supply and aquifers? Mono cropping of any agricultural product is not beneficial to the environment and hemp is no exception. It can invite unwanted pathogens and pests, which would devastate the established commercial cannabis community.

Strict guidelines must be in place to disallow the use of conventional pesticides especially if the county is considering the allowance of hemp to be cultivated using traditional agricultural methods. Imagine the lasting impacts that will have on our soil and our health in the years to come if restrictions are not in place to prevent the use of harmful and toxic pesticides?

We must not only protect the cannabis cultivation community that has stepped forward to become licensed in the legal market, but also the rest of the public as well. Wind drift is real and cross contamination of pesticides to neighboring cannabis farms will certainly have impacts.

In the current State regulations for cannabis cultivation, products are not allowed to enter the marketplace unless it passes strict testing requirements, which include the disallowance of 66 different types of pesticides and 4 types of heavy metals. Hemp cultivators should be held to the same standards to ensure public safety and protection for our environment.

CCAG supports hemp but not in our county which has a foundation historically built around high quality, medicinal cannabis production. We do not have the land to support such row crop production and maintain a sense of security for surrounding commercial cannabis cultivators.

The hemp pilot program as currently written does not address what consequences would follow if a hemp farm causes a neighboring cannabis farm to become seeded, contaminated etc. Who would bear these costs that could devastate a farmer? The county must take active steps to protect our farming community.

Given the current state of affairs we are facing as a nation, it seems overly confident to assume Mendocino County would have the staff time to develop this program and the expertise to inspect hemp plants that may express male genetics. Since we have no idea when the shelter in place order will be lifted, it's not the right time to launch this program.

CCAG recommends that the county ban hemp cultivation in our county at this time because there is not enough protections in place to guarantee viability for both hemp and cannabis producers to co-exist. The risks are far too great. Our county should not be willing to take this chance for a few hemp farms that have the potential to negatively impact licensed commercial cannabis farms in our communities.

Thank you for considering our feedback on this important agenda item.

Sincerely,

Monique Ramirez
Founder- Covelo Cannabis Advocacy Group