

**ATTACHMENT 7**

**Public Comments**

**From:** [Merritt Perry](#)  
**To:** [Adler, Elanah](#)  
**Subject:** RE: Questions regarding Hemp Ordinance  
**Date:** Tuesday, October 01, 2019 1:41:37 PM

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Thank you Lana.

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**From:** Adler, Elanah <EAdler@co.humboldt.ca.us>  
**Sent:** Tuesday, October 1, 2019 1:06 PM  
**To:** Merritt Perry <mperry@ci.fortuna.ca.us>  
**Subject:** RE: Questions regarding Hemp Ordinance

Hi Merritt:

I've copied your questions and will address the responses below each question:

1. Q: Why was the West End Road area identified as an ideal location for a hemp management zone? Was it due to the lack of cultivation of other types of cannabis in that area?  
A: The Industrial Hemp Management Zone (IHMZ) was identified at a landscape level, including lands zoned Agriculture Exclusive (AE), have existing agricultural uses, are outside community plan areas and are low in the watershed.  
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2. Q: Did any specific land owners request this designation for the West End Road area?  
A: The IHMZ areas were selected based on existing agricultural use, zoning, watershed and community plan characteristics, not based any land owner requests.
3. Q: What is purpose of outlawing seed production in hemp management zones when this may be a viable product of hemp cultivation?  
A: The prohibition of seed and fiber production in the IHMZ was based on the feedback we received during our public workshop outreach. From what we heard, the overwhelming interest in the use of Industrial Hemp in the community is for medicinal purposes, i.e. CBD production, not for seed and fiber production. Additionally, there is concern that hemp pollen from new large scale fiber and seed production operations could negatively impact existing commercial cannabis cultivation.
4. Q: Are there other examples of county ordinances that require the indemnification of the county by an agriculture producer? Why was this added to the ordinance? Will the indemnification be required for those in the hemp management zones?  
A: The Commercial Cannabis Land Use Ordinance is another example of a County ordinance that requires indemnification of the County by an agricultural producer. This was added to the ordinance because this is a new agricultural industry, with some unknowns and concerns about the potentials that are unforeseen at the present time. This indemnification would be required for all those who conduct any activities as authorized under this ordinance.

I hope that my answers have addressed your questions. Please feel free to contact me if you have any additional questions.

Thank you, Lana

**Elanah Adler**

Planner II

Humboldt County

[Long Range Planning Division](#)

3015 H Street | Eureka, CA 95501

707-445-7541

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**From:** Merritt Perry <[mperry@ci.fortuna.ca.us](mailto:mperry@ci.fortuna.ca.us)>

**Sent:** Monday, September 30, 2019 12:35 PM

**To:** Adler, Elanah <[EAdler@co.humboldt.ca.us](mailto:EAdler@co.humboldt.ca.us)>

**Subject:** Questions regarding Hemp Ordinance

Elanah,

I had a couple of questions for you. My property is within the proposed industrial hemp management zone on west end road.

Here are my questions:

1. Why was the West End Road area identified as an ideal location for a hemp management zone? Was it due to the lack of cultivation of other types of cannabis in that area?
2. Did any specific land owners request this designation for the West End Road area?
3. What is purpose of outlawing seed production in hemp management zones when this may be a viable product of hemp cultivation?
4. Are there other examples of county ordinances that require the indemnification of the county by an agriculture producer? Why was this added to the ordinance? Will the indemnification be required for those in the hemp management zones?

Thank you in advance for your timely response.

Merritt Perry

499-4416

**From:** [Nate Madsen](#)  
**To:** [Adler, Elanah](#)  
**Subject:** Draft Hemp Ordinance  
**Date:** Thursday, October 03, 2019 2:51:32 PM

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Hi Lana,

Thank you for fielding comments on this draft hemp ordinance. I apologize for the delay in getting these comments to you; I know the meeting is tonight. It has been a busy week for me.

I am working from the print out from the meeting at the ag commissioners office the other night and will reference sections per that print out. I mention that in case a new draft has been produced since.

1. 55.5.2 first paragraph I question the need to say, “reduces negative impacts on our community and environment,” So far I don’t know of any negative impacts and think we are not likely so see any negative impacts beyond what an agrarian culture generally produces. I would strike that clause and the paragraph still reads fine.
2. Same section second paragraph same comment as relates to, “from harm resulting from industrial hemp activities,”
3. 55.5.3.4 This reads a little rough. It seems to indicate that this is to limit the activity of growing industrial hemp to just the areas depicted on the map, but I may be reading this to narrowly. I would craft this paragraph a little different and as I will discuss related to section 55.5.6.1 I would open this up significantly. I think limiting hemp production to the areas depicted on the Industrial Hemp Management Zone **and** areas primarily zoned for agricultural production on prim ag soils is appropriate.
4. 55.5.6.1 I would add areas primarily zoned for agricultural production on prim ag soils to the application of this section.
5. 55.5.7.1.2 I would encourage (as an austerity measure for all the struggle permitted cannabis farmers have sustained) allowing those permitted farmers to add square footage, not replace square footage. I would not limit it by any amount of area (i.e. the 3,500 or less as is the language) but rather by existing potential infill to already developed areas. I.e. if they have a timber conversion they can use any of that area that is not in use for cannabis production. I would add language to this section precluding any cutting of trees or further conversion or grading. I will discuss this further in section 55.5.8.1.6 but I think a preclusion of grading all together would be appropriate and would preclude any conversion be it timber or other native meadow not previously impacted by human activity. Feel free to call me to discuss this detail if I am not being clear here or missing a detail. The idea is no further development of otherwise unimproved native conditions, but allow use of any and all already impacted lands such that a more profitable operation can be achieved without any further impacts.
6. 55.5.8.1.2 change 5,000 sf to 1 acre subject to the limitation of section 55.5.7.1.2 as discussed in #5 above.
7. 55.5.8.1.3 Though I personally prefer the idea of exclusive full sun outdoor, I don’t see why hemp should be subjected to additional limitations other crops are not subjected to. You can use a greenhouse for tomatoes and receive a substantial advantage as to early to market as protection from rain. I think hemp should also have that as an option; strike,

“greenhouses, protective covers, or” from the last sentence of this section. As discussed at the meeting this might also be a good means to contain pollen drift and I don’t think this option should be off the table.

8. 55.5.8.1.6 Strike, “of more than 50 cubic yards of soil” and replace that wording with “for purpose of creating a cultivation area”.
9. 55.5.8.1.8 (d) Leave this as is and add to the end another sentence, “Unless clear and compelling evidence can be provided that no impacts to water quality or quantity including but not limited to potential sedimentation, agricultural runoff, pesticide contamination will result from the industrial hemp cultivation project.” Then add language to establish a permitting process to determine that finding. I.e. ZCC goes to SUP or CUP as is appropriate.
10. 55.5.11 unless compliance with CEQA requires the first paragraph of this section, I would strike it. I don’t see how limiting agricultural production serves the better needs of Humboldt County and I don’t see how CEQA will limit this so long as cultivation is limited as discussed here, to already impacted areas. This is a great opportunity to apply local knowledge, the “Humboldt Brand”, and reap substantial benefits. I would like to see growing encouraged not discouraged provided impacts are managed and limited appropriately. I feel strongly that can be done and open this up quite a bit more than this section allows. We don’t limit raspberry production this way and it represents nearly identical impacts.

That is it for my input as to the current draft.

As to the alternatives:

1. 1(a) and (b) yes and yes to these two ideas.
2. 2(a) not sure how I feel about this...
3. 2(b) yes
4. 3(a) No to modifying the Hemp ordinance to match the CCLUO and yes to modifying the CCLUO to more directly parallel the hemp ordinance (and ideally incorporate the ideas listed above).
5. 3(b) I am not sure much of this is needed. The ordinance as drafted limits hemp production to native soils (an idea I support) so not sure why we need to remove “bags, pots, or other containers[.]” The other Junk can go, except the pond liners... not sure how that serves a need, but I guess it is handled with the last sentence in this paragraph... so maybe this is just precautionary and well be subjected to review, but some how I would like there to be some limit on the discretion here. Maybe add a sentence to the end that says, “if the operator provides such a plan then the county shall allow said infrastructure to remain for its continued use.” Or something to that affect.
6. 3(c) yes but it doesn’t need to be regulations. It should just be a mandate. “Operator shall contain pollen drift such that it does not impact any neighbors. Operators shall be liable for any harm caused by a violation of this section.”
7. 3(d & e) not strong feelings but would give input if draft language becomes available. There is certainly an opportunity here, but I might leave it up to the producer, but maybe there is a real advantage and I would support that if it comes to fruition.

Thank you again for all your work on this project and for maintaining such a wonderfully open and engaging process!

Please do not hesitate to reach out if I can be of any assistance or you would like to discuss any of these or other ideas further.

I hope to see you at the meeting tonight.

Best,

Nate Madsen

**From:** [Whitewolf Switzer](#)  
**To:** [Adler, Elanah](#)  
**Subject:** Draft Hemp Ordinance  
**Date:** Wednesday, October 02, 2019 9:18:51 PM

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**Elanah Adler, Planner  
Humboldt County Planning Department**

**This is Whitewolf Switzer of Palo Verde Farms, LLC in Garberville**

**We testified in both hearings on the Industrial Hemp Ordinance and we also were amongst the original applicants for the Hemp permits with the Humboldt Dept. of Agriculture.**

**We only learned of these workshops today and are interested in growing Hemp Flowers for CBD.**

**We are currently licensed under the County Cannabis Ordinance.**

**The calendar indicates the dates of the Planning Commission Hearings. We also need the times in order to attend and comment.**

**The following family members would also like to attend: my son, Mark Switzer owner of the land for Palo Verde Farms, Harmony Switzer-Tryon, a Hemp Patient and my granddaughter, and Lorraine Tryon, Harmony's mom and an applicant for a Hemp Permit thru the Dept. of Agriculture.**

**Respectfully**

**Whitewolf R. Switzer, CEO  
Palo Verde Farms, LLC  
355 Road A  
Garberville, Ca 95542  
707-354-1985**

**From:** [Gillian Levy](#)  
**To:** [Planning Clerk](#)  
**Subject:** Draft Hemp Ordinance  
**Date:** Thursday, October 03, 2019 6:03:00 PM

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To Whom It May Concern,

I am the co-founder and co-owner of Humboldt Apothecary, a women owned craft cannabis manufacturing company in Arcata. Our products are made from the biomass of small farms in Humboldt County, and we are very proud supporters of our local Humboldt County cannabis farmers.

Many of our products are made with cannabis that is high in CBD, in fact our CBD tinctures are a staple of our business. Out in the larger cannabis community, we have a devout following of people that love our products and whose lives have sometimes been significantly and profoundly altered in a beneficial way by using our products. In fact, we have gathered so many anecdotal stories of how well these tinctures work for people that we are pretty convinced that the particular CBD cultivars that local farmers have bred and cultivated for years here in Humboldt County are quite special. Something to note about many of the CBD cultivars in this community is that while they are high in CBD, the percentage of THC exceeds the federal allowable limit of under .3%

I write all of this to make a point that I truly believe that the small cannabis farms in Humboldt County have real value in the future of California cannabis, and perhaps someday soon, a global cannabis economy. This is partly because of the particular appellation of the region and the multitude of cannabis strains that have been bred and stabilized in these mountains and watersheds.

I think it is imperative that we protect and support the small cannabis farms in Humboldt County. Because of this, I would encourage the planning commission to enforce a moratorium on hemp in Humboldt County. I have particular concerns about the ability of hemp pollen to travel on the wind to neighboring farms and compromising both the value of the cannabis crop as well as the integrity of future seed stock, a Humboldt County treasure that farmers have spent generations stabilizing and perfecting.

Additionally, I am concerned about the issue of space for hemp farms. While craft cannabis farms can be small and still profitable, hemp farms yield significantly smaller profits per pound, thus requiring large tracts of agricultural land, which this county just does not have. Let's continue to support our small farms and wild lands, and leave hemp farming in more open, traditionally agricultural inland valleys where it belongs. There are too many risks and unknowns at this point if we are to lift the moratorium on hemp.

Thank you for your time,

Gillian

Gillian Levy  
President, Humboldt Apothecary



## Richardson, Michael

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**From:** Sarah Balster <balster707@outlook.com>  
**Sent:** Thursday, October 3, 2019 4:39 PM  
**To:** Richardson, Michael  
**Subject:** Hemp Ordinance Comments

Oct 3, 2019

### Humboldt County

Attn: Long Range Planning, Building, Code Enforcement and Agriculture Departments, Planning Commissioners and Board of Supervisors and fellow Members of the Public

Thank you for your time and attention to Hemp Cultivation in the County.

Following the Farm Bill's acceptance of Hemp production in the USA, the California State Agriculture Department approved statewide cultivation in April 2019. While the various regulations are enacted it is prudent to extend some level of prohibition of cannabis until the nuances of the plant can be adequately recognized by lawmakers the industry and consumers. In this light a temporary prohibition of Hemp production for fiber and seed maybe appropriate. Although I caution excessively restrict language being adopted through this ordinance.

Industrial Hemp is defined as any cannabis crop less than 0.03% delta 9 tetrahydrocannabinol cultivated at an area exceeding 5,000 square feet. Effective oversight from the county's Ag department and other affiliate organizations can ensure safe and sustainable production. There are still many questions to be answered which why I request that research be allowed.

My edits are here in [green](#)

- **Section 55.5.3.4** Other than as enumerated in this Section, Industrial Hemp Cultivation and all other Industrial Hemp activities are prohibited, [excluding established agricultural research facilities](#) in any zoning district other than those zoning districts where it is expressly permitted.

Supported by section....55.5.4 which defines a "Hemp Breeder" An individual or a public or private institution or organization that is registered with the Agricultural Commissioner to develop cultivars of Industrial Hemp intended for sale or research.

And as further defined in the 2599 CCLUO

55.4.4 regarding...

"Cannabis Research Garden" means a cannabis cultivation facility engaged in the research or development of cannabis, cannabis strains, or cultivars for the medicinal or adult use of cannabis but which does not produce product for commercial distribution, manufacture, dispensing, or sale.

"Cannabis Testing and Research Laboratories" means a facility, entity, or site that offers or performs tests of cannabis or cannabis products licensed by the State of California pursuant to Business and Professions Code section 26000, et. seq., and businesses and research institutions engaged in the research of cannabis, cannabis products, or devices used for the medicinal or adult use of cannabis products at which no commercial cannabis cultivation or distribution, manufacture, dispensing, or sale of medical cannabis occurs.

55.4.10.9 **Cannabis Research Gardens** shall be permitted wherever commercial cannabis cultivation activities are allowed, and subject to the same permitting requirements applicable to commercial cultivation activities, including participation in the Humboldt County and State of California track and trace program and annual inspection. Applications for a cannabis research

garden permit shall provide an operations plan to include a verifiable method to assure that cannabis grown for research purposes is prevented from entering the stream of commerce.

Ordinance 2627 Section 1 N. states "Despite the current prohibition on the cultivation of industrial hemp for commercial purposes, FAC Division 24 exempts cultivation by an "Established Agricultural Research Institution" from some of the regulatory requirements enumerated therein. However, before cultivating industrial hemp, an established agricultural research institution shall provide the Global Positioning System coordinates of the planned cultivation site to the commissioner of the county in which the site is located."

The provisional moratorium on the Cultivation of Industrial Hemp by any person or entity for any purposes, which is expressly prohibited in all zoning districts in the unincorporated area of the County. Additionally, during this interim ordinance, including any extension hereto, "Established Agricultural Research Institutions" as defined in FAC Section 81000, will similarly be prohibited from cultivating industrial hemp for agricultural or academic research purposes." should be repealed.

Additionally here are comments in green for sections

- **Section 55.5.5.1**"Cultivation of Industrial Hemp for the purposes of fiber and seed...is

prohibited."

Exemption should be made for Seed Breeding and Research. And Fiber is a large component to the current cultivation of cannabis. At this point in time the fibrous stalks of the plant are either disposed of as waste or in some cases incorporated as biomass for extractive purposes. The value added by opening the door for the sustainable use of the stalks, or the fibrous parts of the plants will enhance the county's agricultural systems and economic viability.

- **Section 55.5.6.1** Cultivation Within the Industrial Hemp Management Zone

Full Sun Outdoor Cultivation or Industrial Hemp Cultivation within existing or **approved** greenhouses using only clones or feminized seeds by Registrants **Excluding including** Hemp Breeders is allowed within the Industrial Hemp Management Zone with a Registration issued by the Agricultural Commissioner.

Changes to the location of the Industrial Hemp Cultivation Area and/or cultivars used shall require **an amended Registration** ~~separate Registration~~ and may only be issued to replace an approved Registration.

For the Fields  
Sarah Balster

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**Date:**Tue, 15 Oct 2019 10:29:55 -0700  
**From:**Lisa B. <[mingobaby@gmail.com](mailto:mingobaby@gmail.com)>  
**To:**[planningclerk@co.humboldt.ca.us](mailto:planningclerk@co.humboldt.ca.us)

Dear Chair Morris and Humboldt County Planning Commissioners,

The passage of Prop 64 legalized recreational cannabis and industrial hemp by 57% of voters statewide and 59.5% in Humboldt County (Eureka-63%: Arcata/Bayside 71%: McKinleyville/Trinidad/Orick 66%).

The State of California has implemented the voter approved cultivation of hemp with the registration of farmers starting in April of this year. The state currently has 23 counties producing hemp, with 258 farmers, 34 seed breeders and 16,899 registered acres.

Hemp in California is an agricultural crop. This has been furthered by the recent passage of the 2018 Federal Farm Bill and more recent in early September, when Governor Newsom signed an amendment to the Williamson Act clarifying that hemp cultivation counts as an agricultural commodity.

Back in May of this year, the Planning Department was directed by the Board of Supervisor's to develop regulations for industrial hemp

production in Humboldt County that *reflected the public interest and input* received over several meetings before the Board.

The Planning Department provided you with a proposed pathway that was not well received at your previous workshop by some cannabis growers. To help address their concerns, I believe the County should scale back the scope of the program and allow industrial hemp production ONLY in AE zones, *without requiring a CDP in the coastal zone*- as an allowable use in native soil and sun- much like corn or pumpkins, as an agricultural commodity.

Concerns that were voiced at the meeting, such as pollen drift and pests, have plagued the cannabis industry for years. Mites and aphids are common throughout Humboldt County in cannabis. This does not have to do with hemp, but with common cannabis industry practices, including the propagation of clones and the use of imported soils.

The Planning Department has proposed feminized seed or clones only for industrial hemp, except for seed breeders, as a method to mitigate pollen drift. Personal backyard cultivators can and do grow both males and females and most cannabis growers do as well. Cannabis growers are not required to use feminized seed or clones only. The county should not require this for industrial hemp either.

Allowing industrial hemp production limited to AE lands will keep it away from cannabis growers in the hills, while still enabling hemp production as directed by state law. If, in the future, cannabis growers seek to integrate hemp-derived CBD into their profile to benefit their bottom line, then the county can find a pathway for this to happen through conditional use permitting or additional regulation.

It is time to re-frame the discussion and start seeing the opportunity that lies ahead. It is important for the County to look at this as an

opportunity for all farmers. I am a 40-year resident of Humboldt County and a commercial apple farmer. I get \$1.50 a pound wholesale for my apple crop. The inclusion of hemp into my production would greatly increase my profitability and success as a farmer and I am certain this would be true for many farmers and ranchers in Humboldt County. CBD hemp production will be good for local farmers and good for local manufacturers making value added product from locally grown CBD that can be sold nationwide. It will be also be very good for local retailers who currently are only able to sell hemp CBD products grown outside of the County.

Rather than continue with fears that have scarred the potential of this crop since 1937, the County should be eager to find solutions for enabling the agricultural production of hemp to flourish in concert with the cannabis industry, as dictated by state law and the people of California.

By extending a moratorium on industrial hemp, the County is essentially eliminating an economic and agricultural opportunity for our local farmers, producers and retailers and serves only to kick the can down the road, which is not what the Supervisor's asked their staff or Planning Commission to do.

Thank you for your consideration.

Lisa A. Brown

Humboldt County Planning Commissioners,

Hello,

My name is Holly Hayes. I have lived in Humboldt and Trinity County for 18 years. I hold a small outdoor cannabis cultivation license in Willow Creek. I have worked for years and spent my savings successfully navigating Humboldt County's cannabis permitting process.

At this time I believe it is irresponsible for Humboldt County to allow hemp cultivation permitting.

Hemp cultivation has not existed in this country commercially in over 80 years until very recently. I grew up in Iowa and year after year the ditches are filled with relics of the past; commonly referred to as ditch weed. This hemp has continued to self sow for the last 80 years. That means a lot of pollen is in the air all summer long.

This seemingly small detail could be the end of sinsemilla, seed free, cannabis in Humboldt County if hemp cultivation exists here. My farm would be out of business in the first season of permitted hemp cultivation in Willow Creek.

Most cannabis farmers in Humboldt County will be gone if you allow hemp cultivation at this time.

Furthermore, cannabis farmers in California must adhere to strict Integrated Pest Management, IPM, in order to prevent the use of herbicides and pesticides that come with most agriculture.

Cannabis farmers in California are held to the most strict batch testing standards screening for herbicide and pesticide use.

Our cannabis farms would be at great risk from spray drift and contamination from conventional hemp farming practices which could ruin entire crops of commercial cannabis by failing state testing.

Please do not jeopardize this budding legal cannabis industry in Humboldt County. We have worked hard and done our part to be here. There may be a place and time for hemp in Humboldt but it is not here and not now.

Thank you for your time,  
Holly Hayes  
info@rusticfarms.org  
(707) 798-0588

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October 15, 2019

Dear Humboldt County Planning Commissioners,

Please accept the following letter on behalf of the Humboldt Edge Farm, located in Willow Creek. Hemp cultivation is a re-emerging industry that is stricken by many of the problems that come with agricultural startups. We have been watching the developments within the hemp industry alongside the cannabis industry in Oregon and other states and we are alarmed by the damage the hemp industry has done to the cannabis farms in many of the places where they are attempting to coexist. We are seeing cross-pollination at an unprecedented scale, pest outbreaks that are spreading statewide and beyond, and pesticide use that is contaminating both neighboring and distant crops.

Humboldt County has a reputation for exceptional cannabis flowers and products. Many of these reputations hinge on proprietary genetics held closely by generations of cultivators, which provide an advantage to us as cultivators in the competitive California marketplace. The threat of cross pollination poses a risk to contaminate and even eliminate these precious genetics, and the legacy that they carry.

Hemp genetics are a relatively new development, since hemp hasn't been commercially cultivated in the United States in over 80 years. Also many people entering into the hemp industry have little or no agriculture experience and thus the understanding of cannabis botany is severely deficient. We have seen and heard stories of fields of 50% males from batches of seeds from a breeder who promised 99% feminized seed. There are rogue males sprouting up in agricultural ditches downstream that are causing unknown levels of harm. Neighbors are pollinating neighbors, hemp and cannabis farms alike and the economic destruction that's resulting is devastating to the families involved and to the economy of the counties and state's as a whole.

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Hemp genetics are a new focus of modern breeding with very few field trials in different bioregions. Hemp seeds are unstable in and of themselves do to the widespread practice of hybridization, and the rare occurrence of line breeding. Cannabis is a monoecious species, so any level of breeding work, even with the chemical feminization, will result in male and female plants. High levels of intersex plants (hermaphroditism) are occurring, causing cross-pollination. Frankly, it's just way too soon, and there isn't the science to back up the seeds that are currently on the market. There are numerous lawsuits over hemp genetics that can be referenced to verify these points.

Also the lack of continuous hemp breeding in a diverse array of microclimates subjects the plants to moisture and temperature associated diseases such as mold and mildew. We are seeing widespread hemp crop failures across the US this fall.

Pests and pest resistance is also a major concern. Both crops are susceptible to the same pests and hemp is cultivated in a way that is more prone to pests and disease. Hemp is also not regulated as thoroughly as cannabis and many fungicides and pesticides used on hemp are can ruin a cannabis crop if cross contamination occurs, and has been known to happen due to pesticide drift on the wind. Numerous instances of conventional food crop fields being sprayed in Monterey and Santa Barbara counties have resulted in cross contamination to cannabis farms. Hemp fields may also harbor larger populations of pests and diseases which can act as a vector for contaminating nearby crops. Also pests may become resistant to chemicals used in hemp cultivation, which then can further complicate the pest management of cannabis farms.

We have been through the gauntlet to permit and license our farms and many of our friends and neighbors are still wading their way through the process. The county has been burdened by the monumental task of

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processing thousands of applications, and frankly we believe it is irresponsible to open the door to hemp cultivation permitting at a time when so many legacy cultivators are still in the process of permitting.

78,000 acres of hemp were cultivated in the US in 2018, this year there is over 500,000 acres cultivated. 2018 the wholesale price of hemp flower, was 50 per pound, this year reports are coming out that it is \$10 or less. On the scale that our landscape can accommodate responsibly, the economic viability of hemp in Humboldt County is extremely low.

Please consider the heritage that cannabis farmers represent, as well as our contribution to the economy of our communities when you consider hemp cultivation in Humboldt County.

Sincerely,  
Matthew Nagel and Samantha Shull  
Owners and Operators of Humboldt Edge Farm

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COMMENTS

Your Name: Teresa Mondragon

Meeting Date: 10/3/19

Meeting Subject: legalization of industrial hemp

Contact Information (phone or e-mail): 707 834 6442

Meeting was what I expected: Yes  No  couldn't go

Meeting was informational / educational: Yes  No  Not Applicable

I got my questions answered and / or had input: Yes ? No  Not Applicable



Comment - be as specific as possible

I urge you to Not allow industrial hemp cultivation in Humboldt County. Allowing it will almost certainly have a negative impact on the already struggling cannabis industry. Limiting hemp planting to only clones or feminized seeds will NOT help or prevent cross-pollination with cannabis. Clones and feminized seeds have the ability to (and often do) form both male and female sex characteristics and CAN pollinate. In the cannabis industry, these plants are commonly referred to as "hermaphrodites". I've personally seen and experienced it dozens of times. If allowed, decades of careful breeding and selection would be ruined. Not to mention that seeded cannabis flowers are largely worthless. Support the farmers who've already paid thousands for permits. Please

do your research before making  
rash decisions. Your community  
depends on it.

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## WILLOW CREEK CANNABIS ALLIANCE

October 16, 19

Dear Humboldt County Planning Commissioners,

Please accept the following letter on behalf of the Willow Creek Cannabis Alliance. We are an alliance of licensed cannabis farms and manufacturers that are very seriously concerned about the cultivation of Hemp in Humboldt County. Hemp cultivation is a re-emerging industry that is stricken by many of the problems that come with agricultural startups. We have been watching the developments within the hemp industry alongside the cannabis industry in Oregon and other states and we are alarmed by the damage the hemp industry has done to the cannabis farms in many of the places where they are attempting to coexist. We are seeing cross-pollination at an unprecedented scale, pest outbreaks that are spreading statewide and beyond, and pesticide use that is contaminating both neighboring and distant crops.

Humboldt County has a reputation for exceptional cannabis flowers and products. Many of these reputations hinge on proprietary genetics held closely by generations of cultivators, which provide an advantage to us as cultivators in the competitive California marketplace. The threat of cross pollination poses a risk to contaminate and even eliminate these precious genetics, and the legacy that they carry.

Hemp genetics are a relatively new development, since hemp hasn't been commercially cultivated in the United States in over 80 years. Also many people entering into the hemp industry have little or no agriculture experience and thus the understanding of cannabis botany is severely deficient. We have seen and heard stories of fields of 50% males from batches of seeds from a breeder who promised 99% feminized seed. There are numerous lawsuits taking place at this time over Hemp seed, and cross-pollination. There are rogue males sprouting up in agricultural ditches downstream that are causing unknown levels of harm. Neighbors are pollinating

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neighbors, hemp and cannabis farms alike and the economic destruction that's resulting is devastating to the families involved and to the economy of the counties and state's as a whole.

Hemp genetics are a new focus of modern breeding with very few field trials in different bioregions. Hemp seeds are unstable in and of themselves do to the widespread practice of hybridization, and the rare occurrence of line breeding. Cannabis is a monoecious species, so at any level of breeding work, even with the chemical feminization, will result in some degree of male and female plants. More commonly we are seeing high levels of intersex plants (hermaphroditism) occurring, causing cross-pollination. Frankly, its just way too soon for hemp to be cultivated in proximity to cannabis, and there isn't the science to back up the seeds that are currently on the market. There are numerous lawsuits over hemp genetics that can be referenced to verify these points.

Also the lack of continuous hemp breeding in a diverse array of microclimates subjects the plants to moisture and temperature associated diseases such as mold and mildew. We are seeing widespread hemp crop failures across the US this fall. Last thing that we would want after cross pollination would be to propagate and spread fungal pathogens to infect nearby cannabis crops.

Pests and pests resistance is also a major concern. Both crops are susceptible to the same pests and hemp is cultivated in a way that is more prone to pests and disease. Hemp is also not regulated as thoroughly as cannabis and many fungicides and pesticides used on hemp are can ruin a cannabis crop if cross contamination occurs, and has been known to happen due to pesticide drift on the wind. Numerous instances of conventional food crop fields being sprayed in Monterey and Santa Barbara counties have resulted in cross contamination to cannabis farms. Hemp fields may also harbor larger populations of pests and diseases which can act as a vector for contaminating nearby crops. Also pests may become resistant to chemicals used in hemp cultivation, which then can further complicate the pest management of cannabis farms. Hemp is still virtually unregulated at this time by the USDA and even here in California by the CDFA so many of the chemicals used

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in industrial agriculture may be used on hemp with many unknown short and long term consequences.

We have been through the gauntlet to permit and license our farms and many of our friends and neighbors are still wading their way through the process. The county has been burdened by the monumental task of processing thousands of applications, and frankly we believe it is irresponsible to open the door to hemp cultivation permitting at a time when so many legacy cultivators are still in the process of permitting.

78,000 acres of hemp were cultivated in the US in 2018, this year there is over 500,000 acres cultivated. 2018 the wholesale price of hemp flower, was 50 per pound, this year reports are coming out that it is \$10 or less. On the scale that our landscape can accommodate responsibly, the economic viability of hemp in Humboldt County is extremely low. More importantly the risk that hemp poses to the legacy cannabis industry here, is too great to justify, a new commodity crop being grown here that threatens a heritage industry of family farms.

Please consider the heritage that cannabis farmers represent, as well as our contribution to the economy of our communities when you consider hemp cultivation in Humboldt County.

Thank You

Willow Creek Cannabis Alliance

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