



HUMBOLDT COUNTY GROWERS ALLIANCE

September 17, 2025

HCGA Comments on Item H2: Amendments to Cannabis Microbusiness Standards

Dear Planning Commission Members and Staff,

On behalf of Humboldt County Growers Alliance, we appreciate the opportunity to comment on Item H2 regarding proposed amendments to commercial cannabis microbusiness standards.

Expanded Opportunities for On-Farm Value-Added Activities are Critical for Craft Cultivators

The ability to bring additional, value-added activities onto farms - including nurseries, processing, non-volatile manufacturing, distribution, and on-site or delivery-based retail sales - is critically important for small and craft cultivators. With wholesale prices for cannabis flower collapsing well below the cost of production, the production of high-quality and value-added products is essential for small farmers to retain a foothold in the marketplace.

While it's possible to outsource these value-added activities to off-farm partners, this often risks both the quality of the product and the cultivator's ability to retain a share of the value. The ability to pursue these activities on-farm under a single producer's control is part of the essence of craft cannabis, just as microbreweries and "estate bottled" wine preserve quality by retaining multiple steps of the production process under the same operator. Expanding opportunities for these activities is among the most important actions the county can take to support a viable and sustainable local industry in the face of extreme challenges in market conditions.

Support For Proposed Amendments and Request to Address Remaining Building Code Barriers

By 1) expanding the scope of cannabis uses which can be permitted through a ZCC, and 2) streamlining permitting for low-impact uses involving non-volatile manufacturing, the proposed amendments would incrementally increase the accessibility of on-farm value-added activities for small cultivators. We support these important steps in the right direction.

In conversation with our membership, however, the most significant barrier in practice to permitting additional value-added activities on-farm has been compliance with expensive and onerous commercial building code standards. We are concerned that, without addressing these

standards, the proposed ordinance changes would do little to practically expand opportunities for on-farm vertical integration.

In conjunction with the proposed ordinance changes, then, we request that the county assess opportunities for cultivators to bring additional value on-farm - including non-volatile manufacturing - without requiring structures to meet commercial building code standards, provided the operation meets specified requirements. For example, Section 314-45 of Humboldt County Code establishes development standards and limitations for the operation for “cottage industries” in the county. This code section allows cottage industries to be permitted pursuant to a number of performance standards, including that the residence is owner-occupied; that the industry occupies less than 25% of the floor area of the dwelling or accessory structure; and that no employees are present other than residents of the dwelling.

To ensure that the proposed ordinance amendments have practical impact, we request that the county consider this and other potential approaches to address the barriers posed by the existing application of commercial building code requirements.

Thank you for your consideration,

A handwritten signature in cursive script that reads "Ross Gordon".

Ross Gordon
Policy Specialist
Humboldt County Growers Alliance