



HUMBOLDT COUNTY GROWERS ALLIANCE

August 4, 2021

Dear Planning Commissioners,

On behalf of Humboldt County Growers Alliance, representing over 250 licensed cannabis businesses, we would like to offer the following comments on the CCLUO amendments proposed for the August 5th Planning Commission agenda.

HCGA supports the allowance for minimal artificial light in the canopy area for outdoor cultivation, which is consistent with standard industry practices for worker safety and prevention of flowering.

We also generally support the framework for immature plant area assessments proposed by County staff, which allows for either 1) up to 25% of cultivation area to be substituted for untaxed immature plant area, or 2) if an operator would like to add additional immature plant area to an existing (and fully approved) 1.0 or 2.0 permit, a discretionary permit would be applied for following the provisions within Ordinance 2.0, which includes relevant environmental studies (biological, floral, and cultural) and appropriate mitigations.

Immature plant area is a vital and necessary part of the cultivation of cannabis plants. All plants start out as either seeds or clones and need to grow through their teenage stages before they are placed in the flowering area. Even when cultivators are purchasing clones from a licensed nursery, it's necessary to temporarily store these plants before they are placed in their flowering areas. It should be noted that immature plants use a minimal amount of water, which is already included within the applicant's water budget. The proposed amendments will allow additional flexibility for cultivators to adopt standard practices for immature plant management, while also accounting for any necessary environmental mitigations.

In addition to staff's recommendation, we would also suggest the following additions and amendments to this framework:

- For projects seeking an additional immature plant area under a discretionary permit, we ask that the 25% limitation be removed. Because the applicant is applying for a discretionary permit, they should not be limited to 25% for immature plant area. The applicant can apply for up to the carrying capacity of their land and will be approved (or denied) based on the discretion of the Zoning Administrator or Planning Commission.

- We ask that the Planning Department issue a policy directive that affirms the existing allowance for 10% of immature plant area, a policy which has been in practice for several years. Such a policy directive would provide clarity and consistency to licensees.
- We request verification from the Planning Director that a fully approved and entitled 1.0 permit remains within the confines of Ordinance 1.0. We understand that if a fully entitled 1.0 permit holder applies for additional square footage or additional permits, only the new areas proposed for development are studied and mitigated according to Ordinance 2.0.W

Thank you for your consideration, and please feel free to contact us with any questions.

Sincerely,

Natalynne DeLapp
Executive Director
Humboldt County Growers Alliance

Ross Gordon
Policy Director
Humboldt County Growers Alliance



This is an example of “Immature Plant Area,” a place where young, “teenage” plants are held temporarily prior to being transferred to their “forever homes,” cultivation areas to flower.