

December 15, 2015

Board of Supervisors' Chambers
Humboldt County Courthouse
825 5th St.
Eureka CA, 95501

Dear County Supervisors,

We, the undersigned organizations, businesses, and individuals, are concerned with the ongoing attempts by the County Planning Commission to regulate medical cannabis production.

Based on our review of the Planning Commission process, we do not believe that the recommendations proposed are sufficient to adequately ensure environmental resources are protected. In developing a land use ordinance, we urge the county to consider the following recommendations:

- **Mandatory Water Forbearance Between May 15 through October 31:** Drought and dry season water diversions are one of the most pressing environmental issues facing the county's water resources. Wet season diversions and rainwater catchment protects water quality and quantity. There should be no surface water diversions between May 15 to October 31.
- **Protect Forest Resources:** One goal of a successful ordinance should be to bring as many cultivators, including those cultivating on Timber Production Zone (TPZ) and other Forest Zones, who are willing to take immediate action to ensure baseline environmental standards are met, into compliance with all applicable laws, and stop the further proliferation of cannabis operations on TPZ land by prohibiting new operations.
- **Place a Cap on Total Number of Operations:** The County should impose a cap on the total number of permitted operations. A cap on operations may best be facilitated through a limited enrollment period followed by a moratorium on new operations; or by establishing a maximum number of licenses that would be issued, followed by a moratorium period. After a period of three years, the County should revisit where it could assimilate additional cannabis operations based scientific data and watershed carrying capacity.
- **Ensure Adequate Funding:** The regulation of cannabis is dependent on adequate funding of inspection and enforcement. While we understand the desire to complete a land use ordinance first to meet the state March 1, 2016 deadline, we urge the county to diligently pursue a separate funding measure so it may be included on the June 2016 ballot for voter approval.

These recommendations reflect the joint policy recommendations of the undersigned organizations, businesses, and individuals. Signatories may make additional, more specific policy recommendations, in their individual capacity.

Thank you for your consideration of our comments. We look forward to cannabis farmers being able to come into the regulatory light, legitimizing the craft and custom of North Coast farmers and improving environmental conditions for all.

Sincerely,

Natalynne DeLapp
Executive Director, EPIC

Jen Kalt
Executive Director, Humboldt Baykeeper

Larry Glass
Board President, NEC

Larry Glass
Executive Director, SAFE

Dave Feral
Executive Director, Mad River Alliance

Paul Harper
Associate Forester, Baldwin, Blomstrom, Wilkinson & Associates

Sunshine Johnson
Sunboldt Grown

Karyn Wagner
Paradigm Cannabis

Brian Shields
Humboldt Medical Cannabis Union

Jennifer Metz
Burning Leaf Productions