



August 26, 2021

The Honorable Kathy Hochul
Governor of the State of New York
Executive Chamber
New York State Capitol Building
Albany, New York 12224

Re: Cannabis Social Justice, Environmental Regeneration and Economic
Inclusivity

Dear Governor Hochul:

Congratulations on becoming Governor of our great state of New York.

NY Small Farma Ltd. (NYSF) is a New York not-for-profit 501(c)(3) whose mission is to foster a socially just, environmentally regenerative, and economically inclusive cannabis community. We are the only advocates educating state law and policy makers about the potential environmental impacts of the cannabis industry. We educate industry, consumers, and decision makers on the benefits of outdoor, regeneratively-grown cannabis to improve climate resiliency, soil health, biodiversity, and local communities, as well as provide sustainable local economic justice. We look forward to working with you achieve these goals in New York.

Though *cannabis sativa* is a hardy plant that was grown outdoors for thousands of years, the century-long cannabis prohibition and criminalization drove cannabis cultivation largely indoors, hidden out of view. Growing cannabis indoors, especially on a large scale, requires massive energy use in the form of high-intensity lighting, heating, cooling and ventilation systems and carbon dioxide generators. It requires massive amounts of energy to reproduce nature indoors. In fact, cannabis is the most energy intensive crop in the country, accounting for roughly 1% of the total U.S. energy use. This number is continuing to climb as cannabis becomes legal in more jurisdictions. Some locales, such as Denver, Colorado, have seen a 42% increase in energy use. Indoor cannabis also uses more synthetic chemicals such as pesticides as they are more susceptible to many pests and diseases indoors.

It is undisputed that climate change is one of the greatest problems we face. Its associated phenomena, including harm to human health, destructive sea-level rise, and extreme weather in the form of damaging storm surges, floods, droughts, and fires directly affect residents, farmers, and businesses in rural, suburban and urban communities alike. These impacts have the potential to displace large populations of New Yorkers, imperil health and upend livelihoods. This is why the 2019 New York Climate Leadership and Community Protection Act set targets of an 85% reduction in greenhouse gas emissions by 2050, 100% zero-emission electricity by 2040, and 70% renewable energy by 2030. The only way to meet these goals is to remove existing carbon and other greenhouse gases and stop further emissions, either voluntarily or through regulatory mandates. Allowing an entirely new energy-intensive industry like industrial indoor cannabis to be formed without limitations will nullify the state's ability to achieve these targets. The new Cannabis Law states one of its goals is to *improve* climate resiliency since settling for energy efficiency and sustaining current emissions levels is no longer acceptable.

Significantly, it is the very people and communities who disproportionately weather the brunt of environmental degradation who were also disproportionately impacted by the unequal enforcement of cannabis prohibition that the new law is meant to redress. Unless we both incentivize outdoor grow and also regulate and limit indoor cannabis cultivation, we will only contribute to climate change and its impacts, and move us further away from social equity within the state. Industrial indoor cannabis cultivators should not have access to subsidized energy, should not earn tax incentives for volunteering to be energy efficient, and should not be allowed to dominate the industry in New York.

Instead, New York should promote and incentivize small, outdoor, regenerative cultivation to improve climate resiliency and capture atmospheric carbon, sequestering it in the soil. Regenerative outdoor farming practices also address issues of waste, synthetic pesticides, irresponsible water use, and fair and equitable treatment of workers. For all of these benefits, it is essential a new model of regenerative growing be supported by the State. We cannot simply adopt the failed industrial agriculture model with cannabis.

NYSF promotes small-scale, regeneratively grown, outdoor cannabis which does not use synthetic pesticides and is focused on organic and sustainable practices that improve the ecosystem, the workers who produce it, local communities and the health of people and planet. Outdoor, regeneratively grown cannabis will directly further the statutory goals of the new Cannabis Law to improve the state's resilience to climate change, to protect the environment, and strengthen the agricultural sector. To this end, New York should

also afford unlimited licenses to craft, outdoor regenerative producers and tax incentives for operations that improve climate resiliency and protect the environment.

Finally, for this law to deliver on its promises of social justice, equity applicants must have genuine economic opportunity so new business owners can enter this market on a level playing field. This requires ensuring equity applicants receive their licenses first, and establishing specific programs and incentives to provide technical training, start-up capital, and incubator and accelerator programs for craft, micro, and small enterprises.

New York needs leadership committed to social justice, regenerative agriculture, and inclusive market access to fulfill the promise of the new Cannabis Law. We urge you to expeditiously appointment representatives to the Cannabis Control Board and the Cannabis Advisory Board who understand and will champion the important principles outlined in this letter. We look forward to discussing with you the steps your administration can take to secure social justice, environmental regeneration, and economic inclusivity in New York's cannabis community. We are including our letters of endorsement for Cannabis Control and Advisory Boards with this correspondence. We thank you for considering out submissions.

We wish you every success in this new position and look forward to working closely with you in the implementation of NY's new Cannabis Law.

Sincerely,



Donna Burns
President
NY Small Farma Ltd.

cc: The Honorable Senate Majority Leader Andrea-Stewart Cousins
The Honorable Speaker Carl Heastie
The Honorable Assembly Majority Leader Crystal Peoples-Stokes
The Honorable Senator Liz Kreuger