

From: [Indy Riggs](#)
To: [Planning Clerk](#)
Subject: Organic Humboldt, LLC, PLN-2020-16475, APN 205-231-029
Date: Friday, April 29, 2022 11:40:00 AM

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Hello.

My name is Indy Riggs and I am writing in opposition to the project PLN-2020-16475 being proposed by Organic Humboldt, LLC located on APN 205-231-029, and with a planning commission hearing date set for May 5, at 6:00 p.m.

I live with my family on the neighboring parcel at 503 Stafford Road. I'd like to first state that we are not anti cannabis. As a matter of fact I have a licensed 2,900 square foot outdoor garden on my property. This folks may already know as it is public information or because the proponent used myself and my license as a justification for their project within their proposal. As a common courtesy I would have appreciated an introduction or even a simple "hello" before being thrown under the bus to my community of which I have been a part of for 30 years. Unfortunately this did not happen. That being said I decided to thoroughly look into this project being proposed next door.

From what I have learned, this project seems to be hastily put together and lends to the suspicion that perhaps this isn't meant for a grow at all, but a license associated with this land in order to fetch a higher asking price. Additionally one of the last things we need right now in Humboldt County is another project that exceeds the broken promise of the one acre cap. This is a promise that was made by our state and one which I believe our county at least should have upheld. The price per pound of cannabis is at an all time low, causing many farmers to scale back production and shutter their farms indefinitely. It concerns me as a farmer that we are seemingly fast tracking large operations while smaller legacy farms are still struggling for support from our county. This particular project by Organic Humboldt LLC submitted an application in June of 2020 and were already scheduled for approval before the zoning administrator on April 21. I am very surprised by the expediency of this application's progress. My father began his application in 2016, passed away in 2019, and I was finally able to obtain a full license from the county in 2021, for a 2,900 sq ft full sun, in the native soil garden. My brother also has a legacy farm which took five years to obtain a county license. I see a pattern here and this pattern is not just associated with myself and my family, it is our entire legacy community. As a county our entire focus should be on helping our existing farms become more viable in this market of forever expanding cultivation. We are holding existing farms back yet greenlighting large new projects that have close to zero viability.

That being said my main concerns with this project are as follows:

1. The defunct rain catchment system.
 - a.) The infrastructure for this system was installed in late February and we have received only around nine inches of rain since then.
 - b.) The corrugated 4" piping collecting water are connected with duct tape to downspouts.
 - c.) Of the four visible downspouts located on two seperate buildings, only one can possibly feed water to its tank. I have even made a previous comment about this

and was told by the project's planner that the applicant would fix this. This has not been done. With that being the case only one small section of one of the two buildings can be attributed to rain catchment. From a glance it looks to be about 10'x16'. That is 160 square feet. When using the nine inches of rain we've received since rain catchment installation and the available sq ft of roof collection we have 9"x160 sq ft= 1,440 gallons of water collected so far this year. Not even enough to fill one of their 2,500 gallon tanks.

d.) There is NOT 50,000 gallons of storage capacity on site.

e.) Last but not least, within the project proposal it is stated that all infrastructure that does not meet elevation certificate status (being the entire site is a floodplain) including water tanks, must be removed during the months between October 15, and April 15. How can these tanks collect water during the rainy season if they must be removed?

2. Streamside Management Area.

a.) The maps provided by the proponent have the SMA all wrong. This is the main Eel River. Measurements must begin from the southern edge of the riparian tree line, and then add the following setbacks in item b.) and c.) which must be observed.

b.) The California Department of Fish and Wildlife requires a 100' setback from the SMA. This is not being observed in the site plan.

c.) The California State Water Board requires a 150' setback from the SMA. This is not being observed in the site plan.

d.) A completed protocol wetland delineation must be completed per CDFW.

3. Negligence of Grounds and Crime.

a.) This property seemed to be abandoned for the last two years. The gate has been laying on the ground this entire time leaving wide open access to the parcel. The gate was erected when the tanks were recently brought in.

b.) When making previous comment on faulty catchment system, the planner of the project's response was it recently was vandalized. As I have called 911 previously because of vandals breaking out windows on the property this statement may be true. (proponent still has not fixed it). However if it was my property I would at least put a chain with a lock on the gate. It currently has what appears to be a bungee cord, but hey at least the gate is erect.

c.) If the two buildings are providing existing power to the operation the power supply must be up to code.

d.) The fence is in the county right of way so it will need an encroachment permit.

e.) The leach field for the septic tank is not identified, nor is the location of the septic tank.

f.) The road apron must be paved.

4. Elevation Certificate.

a.) It is stated within the proposal that all infrastructure which can not obtain an elevation certificate must be removed during the months between October 15, and April 15. The entire parcel is below the elevation required for an elevation certificate with the highest spot 4' below the required elevation.

5. Road Evaluation.

a.) The road evaluation did not take into account the requirement of hauling in and out all infrastructure every year. There are several shipping containers within the site which

will require semi truck transport. There will be 58k square feet of light depts to haul in and out every year. There will be 50,000 gallons of water storage also to be hauled in and out.

b.) To plant 58k square feet it will take more than the two or three employees claimed in the proposal.

c.) Our road is a single lane. For the compliance agreement at my brother's farm, a 10k sq ft, he is required to widen corners of the road. Stafford Road is much smaller and a single lane road that can not accommodate semi truck traffic, nor do we have speed limits posted for this increase in traffic.

To close I would like to quote the vision put forth in the Humboldt County General Plan, The Avenue of the Giants Community Planning Area and Stafford. Section 1360 Community Issues: "The Avenue communities in their visioning work, described several common themes. The Avenue communities would like to maintain their character, and see themselves as small-scale, attractive, communities with thriving cottage industry, tourism and businesses. The communities envision a healthy relationship with the river, working to restore and enhance the natural environment." We understand agriculture is important to economic development. We understand cannabis is as well. However the size and scope of this project does not reflect the vision for Stafford residents and our community. If we cannot influence the outcome with above testimony then I request a 600' setback of the proponents' cultivation from my residence where there is currently a 300' setback as I have seen done in many other neighbor opposed projects within a CPA.

Thank you for the opportunity to participate and make a comment. Thank you to the planning and building department and thank you to the Planning Commission. I do appreciate the work the county has done on my behalf, my family's, and our communities. Thank you again.

Cordially,

Indy Riggs