

**ATTACHMENT 5a**

**PUBLIC COMMENT-CEQA CIRCULATION PERIOD**

## **Yandell, Rodney**

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**From:** Glen Colwell <gcolwell@sonic.net>  
**Sent:** Saturday, February 20, 2021 9:10 AM  
**To:** Yandell, Rodney  
**Cc:** Wilson, Mike  
**Subject:** Mitigated Neg Dec for Arcata Land Co Industrial Grow?

Dear Mr. Wilson and Mr. Yandell,

The Mitigated Negative Declaration issued by County Planning for the proposed Arcata Land Company, LLC Commercial Cannabis Outdoor Light-Deprivation and Mixed-Light Cultivation Project is surprising. I live in the city of Arcata near Alliance road and Foster Avenue. I am concerned about traffic impacts from the Arcata Land Trust's million sq ft industrial marijuana grow now being proposed. A project of this size and scope would seem to merit a full EIR. Infill development projects in the Foster Ave./Alliance Road area that are already approved by the City of Arcata are expected to increase traffic. This large industrial grow will utilize the same impacted roadways.

As a property owner that will potentially be affected by this project, and tax payer in the City of Arcata and County of Humboldt, I would like to have my email address added to any project notification lists so that I may receive updates on this project.

Thank you.  
Sincerely,  
Glen Colwell  
2280 Western Ave  
Arcata CA 95521

Email:  
gcolwell@sonic.net

## Yandell, Rodney

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**From:** Laurie Edwards <laured60@yahoo.com>  
**Sent:** Saturday, February 20, 2021 4:45 PM  
**To:** Yandell, Rodney  
**Subject:** Large cannabis grow at Simpson site a terrible idea

Dear Sir,

As a teenager in the seventies I worked at the Simpson site in the office building there as a mail girl and forestry assistant. My dad also worked there as a forester. We enjoyed the beauty of the Arcata Bottom, riding our bikes to and from the site twice a day. The lovely air, the birds, the coastal winds, the big sky are all part of my memories of growing up on the west side of Arcata. It is inconceivable to me that anyone would consider converting that lovely place into a stinky grow site. Appalling that no consideration is being given to the devastation it would all cause to the quality of life of all the neighbors, many of whom are old Arcata families who do NOT DESERVE to have their lives disrupted by a crime-attracting, traffic-drawing, smelly, semi-legal (no one seems to care that what is legal in the state is still not legal at the federal level) gigantic commercial marijuana operation. I believe it is an entirely shameful idea to inflict this on a beautiful and now quiet (after Simpson's departure) area of bottomland.

Please consider the social, esthetic, and environmental impacts carefully, not just the revenue stream.

Thanks,

Laura Edwards  
1458 Dorthy Court  
McKinleyville, CA 95519

Sent from [Mail](#) for Windows 10

## Yandell, Rodney

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**From:** Harry Ballance <harryballance3@yahoo.com>  
**Sent:** Sunday, February 21, 2021 11:13 AM  
**To:** Yandell, Rodney  
**Subject:** Arcata Land Company Commercial cannabis application

In regards to Arcata Land Company LLC commercial cannabis application I and many of my neighbors have several concerns. First it states they will be using PVC or plastic greenhouses. These do not hold up very well and are not useful for more than 8 months before the PVC starts to break and snap due to exposure therefore causing a large amount of waste in a low lying marsh area.

It also stated in the report that no birds were spotted in the direct area of said development. That they only observed the area for one day. With that absurdly short period of observation I find that hard to believe to say the least. With a grow this size I imagine they will be using salt based inputs because they are easy to use and cost effective with an operation of that size. That being said the runoff is bad news being in that area and will have a negative effect on that fragile ecosystem.

When it comes to the quality of the cannabis they intend to produce there are more issues. Humboldt County is known for the finest cannabis in the world with generations of farmers always striving to make the best cannabis and we take a fair amount of pride in that. The quality in an operation of that size will not reflect anything but a cash grab and erode the value of our county appellation. That is one of the few things keeping mom and pop farms alive though it's next to impossible to thrive with the strict regulations that seems only applicable to the smaller farms. Sun Valley is world renowned for their flowers but as we all know they use a large amount of chemical inputs in both their soil and integrated pest management procedures. We in Humboldt County cannot afford to lose the value in our county's heritage of cannabis and pristine natural beauty that they will most certainly drag down.

Some people also seem to think they will bring more jobs to the area. I seriously doubt that as Sun Valley's track record for hiring local workers at a livable wage is abysmal to say the least. It also seems as though Arcata Land Company is getting a fast track through the process because they have a lot of money and can get around regulations because of this.

I believe that Arcata Land Management converting into a large scale commercial cannabis farm is a bad idea for our environment, culture, and wallets as well as the neighbors and schools adjacent to the proposed facility.

I hope these concerns of me and my neighbors do not fall on deaf ears.

Sincerely,

Harry G. Ballance

## Yandell, Rodney

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**From:** Rhonda Ballance <ballance.rhonda@gmail.com>  
**Sent:** Sunday, February 21, 2021 2:47 PM  
**To:** Yandell, Rodney  
**Subject:** Arcata Land Company LLC Commercial Cannabis Application: SCH # 2021010337

I am sending in my opposition to this proposed project. It makes no sense environmentally, socioeconomically, and is not locally community minded at all. There is so much more to say and I am encouraging you to take into account what is truly best for this area over what is only a corporate interest.

Thank you,  
Rhonda Ballance  
Arcata, CA

## Yandell, Rodney

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**From:** Holly Quinn <g.holly.cq@gmail.com>  
**Sent:** Sunday, February 21, 2021 3:29 PM  
**To:** Yandell, Rodney  
**Subject:** the Arcata Land Company commercial cannabis grow

Dear Mr. Yandell,

Thanks to Nextdoor, I've been made aware of Arcata Land Company (Sun Valley Floral Farms)'s plan for a very large commercial cannabis grow adjacent to the former Simpson Timber mill site.

As a resident of Arcata, I am strongly opposed.

This is so close to a residential area, Pacific Union School, Mad River Hospital and Potawat Health Services. It would significantly increase traffic along Foster Avenue, Alliance Road, and other access roads. The smell of cannabis would be unavoidable. (To many, it is highly unpleasant.)

At the very least, this needs a lot more study, including an EIR.

I (and I know there are many others) feel strongly that an industrial cannabis grow of this size should not be permitted near schools and residences.

Please do all you can to place the priorities of residents and the essential services that would be affected above the desires of Arcata Land Company.

Regards,

Holly Quinn

## Yandell, Rodney

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**From:** Michael Proctor <mmhmm2@icloud.com>  
**Sent:** Monday, February 22, 2021 7:24 AM  
**To:** Yandell, Rodney  
**Cc:** Wilson, Mike  
**Subject:** Proposed Cannabis Production in Arcata Bottoms

Good morning,

We are one of the very few households in our neighborhood who received a letter from the County informing us of the proposed massive cannabis production center intended to be built on the Arcata Bottom. Others in our Neighborhood Watch group were wondering why they never received the same notice, especially the neighbors whose properties are directly adjacent to the parcel. Were they intentionally omitted?

We have been homeowners here for 37 years, fully knowing that we chose to reside near agriculture and farm animals. We are content with hearing neighbors chickens, cows and horses and realize that the smell of manure is evident when the fields are fertilized. We enjoy the quiet evenings and are able to hear the ocean at night. However, we are upset to think that this could all be disrupted with the proposed cannabis production center. Lights, the sound of generators/fans, and the skunky odor of cannabis are not what we had in mind when we created our sanctuary in which we raised our children and now are spending our retirement years.

In an era where resources ought to be carefully considered, a grow operation of this size would no doubt use a tremendous amount of energy, along with precious water. And speaking of energy, the traffic would be greatly increased. From what we read, Sun Valley would pay for a portion of the road updates and we, the taxpayers, would pick up the bulk of the bill...for a PRIVATE COMPANY'S endeavor. It appears that money, over the good of the community, wins again.

Finally, our understanding was that the County limits grows to 8 acres or so. If this project gets the "go ahead" it will be the 10th largest in the United States. We are not happy about this and urge you to decline the passage of this project.

Sincerely,

Michael and Paula Proctor  
Arcata

## Yandell, Rodney

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**From:** Sarita Ray Chaudhury <Sarita.RayChaudhury@humboldt.edu>  
**Sent:** Monday, February 22, 2021 10:37 AM  
**To:** Yandell, Rodney  
**Subject:** Oppose Arcata Land Company, LLC Commercial Cannabis Outdoor Light-Deprivation and Mixed-Light Cultivation Project, Application No. 12255, Case No. CUP16-583

To  
Mr. Rodney Yandell  
Senior Planner  
Humboldt County Planning and Building Department

Please **do not approve** the above project on account of the negative effects of such large scale monoculture to the local ecosystem including soil, air, water, wildlife and residential communities.

There is enough research to discourage such industrial agriculture practices, in particular **the irreparable harm** to water sources in this region. Farmers who have land near this location will also be negatively affected by the enormous amount of water this project will utilize.

There are two schools in that location one of which was attended by my child. I know many people in that locality and cannot imagine how their lives will be upended by this commercial monstrosity in their everyday lives. I **strongly object** to your office granting any sort of permit to this project, temporary or otherwise. In fact, I would like your office to **permanently ban** such large scale monocultures in the county to protect the natural environment as well as the health and wellbeing of the local communities who have indicated strong opposition to this project in various venues including local media and social media community groups.

### Reference:

- U.S. Geological Survey. Water Use Data for California. [https://waterdata.usgs.gov/ca/nwis/water\\_use?](https://waterdata.usgs.gov/ca/nwis/water_use?)
- Dillis, C.; McIntee, C.; Butsic, V.; Le, L.; Grady, K.; Grantham, T. Water Storage and Irrigation Practices for Cannabis Drive Seasonal Patterns of Water Extraction and Use in Northern California. J. Environ. Manage. 2020, 272, 110955, DOI: 10.1016/j.jenvman.2020.110955
- Dillis, C.; Grantham, T.; McIntee, C.; McFadin, B.; Grady, K. Watering the Emerald Triangle: Irrigation Sources Used by Cannabis Cultivators in Northern California. Calif. Agric. 2019, 73 (3), 146– 153, DOI: 10.3733/ca.2019a0011
- Bierkens, M. F. P.; Wada, Y. Non-Renewable Groundwater Use and Groundwater Depletion: A Review. Environ. Res. Lett. 2019, 14, 063002, DOI: 10.1088/1748-9326/ab1a5f
- Zipper, S. C.; Carah, J. K.; Dillis, C.; Gleeson, T.; Kerr, B.; Rohde, M. M.; Howard, J. K.; Zimmerman, J. K. H. Cannabis and Residential Groundwater Pumping Impacts on Streamflow and Ecosystems in Northern California. Environ. Res. Commun. 2019, 1 (12), 125005, DOI: 10.1088/2515-7620/ab534d

Thank you,

Sarita Ray Chaudhury, Ph.D, MBA, MS.  
Department Chair and Associate Professor  
School of Business  
Humboldt State University  
1, Harpst Street, Siemens Hall, Room 121, Arcata, CA 95521.  
(707) 826-6024



## **Yandell, Rodney**

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**From:** Janet Neebe <jkneebe@hotmail.com>  
**Sent:** Monday, February 22, 2021 11:41 AM  
**To:** Yandell, Rodney  
**Cc:** Wilson, Mike  
**Subject:** Arcata Land Company cannabis proposal

To: Rodney Yandell  
Humboldt County Planning and Building

Dear Mr. Yandell,

We are writing to express our concern about and opposition to the proposed Arcata Land Company, LLC Commercial Cannabis Outdoor Light-Deprivation and Mixed-Light Cultivation Project (/).

We live in the unincorporated neighborhood of "Pacific Manor."

Our concerns are maintaining rural agriculture and wetlands in the Arcata Bottom and Humboldt County, maintaining and restoring wildlife habitat, recreational opportunities and quality of life (biking and walking, bird watching), flooding, light and noise pollution, future use of chemicals at the proposed site, air quality, and traffic, including pedestrians and bicyclists. The City of Arcata is developing new housing in this area; how will these homes be impacted by the Arcata Land Company project?

This proposal is basically industrial. It is not in keeping with the rural nature of this area (two examples of appropriate agriculture would include pasture land, or organic crops without greenhouses or lighting).

What is/are the current zoning on this parcel? Also, is it in the coastal zone or tsunami zone? What is the County doing to preserve and restore agricultural and wetlands in the coastal areas of Humboldt County?

How can we become further involved in the planning process for this parcel?

Thank you for your attention.

Janet Neebe and Benjamin Duff  
2021 Upper Bay Road  
Arcata, CA 95521  
707-599-9037

## Yandell, Rodney

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**From:** Kelly VanHoorebeke <kelly@vanhoorebeke.net>  
**Sent:** Monday, February 22, 2021 12:10 PM  
**To:** Yandell, Rodney  
**Subject:** Arcata MegaGrow - Sun Valley

Hi Ryan,

It has come to my attention that Arcata is in the process of permitting a major cannabis grow in an established residential community. The money that Sun Valley will pay in taxes is barely going to cover the uptick in crime and traffic. A project of this size will condemn the area to forever be low income (which might be why this site was chosen. Poor people complain less). The smell is also a huge issue for the people who live in the area as well as for the people who shop there.

In no way should a major agriculture entity be allowed to operate in a populated area.

If Sun Valley wants to depreciate our land, pollute our water and create an even larger class of underpaid employees in Humboldt County we should say NO. There is little benefit to the community at large. Find a better way to collect tax revenue.

Thank you for your time.

Kelly VanHoorebeke

## Yandell, Rodney

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**From:** Ramona Fair <msmadrone@gmail.com>  
**Sent:** Monday, February 22, 2021 1:18 PM  
**To:** Yandell, Rodney  
**Subject:** Opposition to Application No. 12255/Case No. CUP16-583

Hello, I am writing in OPPOSITION to the above project! I live directly next to this (my properties adjoin) at 3212 & 3266 Foster Ave. and I have NEVER received any notification about the proposed cannabis (approved??!) project/s at Sun Valley. The so-called 'leach field' that is part of the project in the field directly behind my house and it is always flooded/swampy from first rains until well into late April/early May. I know- I have lived there for 20 years! There is NO WAY that can serve as a runoff/leach field. ALSO, we are on a private well for ALL of our water- how is that not considered?? The adverse affects of chemical runoff, sludge, etc. would be a hazard to my family & health. WHY have I NEVER been notified of this??

Also, I am in opposition to the other cannabis grows currently proposed for the fields on Foster Ave., Sun Valley, Arcata Land LLC, WE Grow, ETC. There are SO many reasons to oppose! It saddens me that these are even being considered for our peaceful rural community. I could take the time to write out a million reasons why but I'll leave it here and also refer to the letter written to you by Lee Torrence and David Mohrman, residents of the Arcata Bottom- I echo their words and more.

The County has a responsibility to it's citizens- there needs to be an extension of the time frame for public input, letters need to be sent to ALL neighboring property owners/residents and an EIR needs to be done, minimally!

Thank you,  
Ramona Fair  
3212 Foster Ave.  
Arcata, CA. 95521  
707-362-7626 mobile

## Yandell, Rodney

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**From:** Fania Franklin <fania@buncombe.main.nc.us>  
**Sent:** Monday, February 22, 2021 4:38 PM  
**To:** Yandell, Rodney  
**Subject:** Sun Valley

Dear Sir,

When I read that Sun Valley Flower farm is requesting a permit for a million square foot marijuana grow I was in total disbelief. I hope that this insane proposal is not permitted at any level. Not only would it be a great nuisances in Arcata and North Humboldt county as a whole, it is another slap in the face to local growers who have been permitted almost out of existence.

I am NOT a grower. I am a retired school teacher so I have no vested monetary interest. Sun Valley is an international firm. They are not local, do not offer good employment benefits and obviously do not care about the community or they would never make such a preposterous request. Please vote against this.

Thank you,

Fania Franklin  
2322 18th St.  
Eureka, Ca

Sent from my iPad

## Yandell, Rodney

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**From:** Cathy Rigby <cathyrigby56@gmail.com>  
**Sent:** Tuesday, February 23, 2021 7:05 AM  
**To:** Bohn, Rex; Bushnell, Michelle; Wilson, Mike; Bass, Virginia; Madrone, Steve; Yandell, Rodney  
**Subject:** SCH Number 2021010337

I am writing to express my strong opposition to the Arcata Land Company, LLC Commercial Cannabis Outdoor Light Deprivation and Mixed Light Cultivation Project. This project should not be allowed in an area that is surrounded by residences. This project will have severe, detrimental effects on the surrounding residences, schools and churches. Traffic; crime; the horrible odor of the cannabis permeating the area; the lights from the light deprivation component shining in the night; the asthma experienced by those who are allergic to cannabis bloom; pesticides; the disruption for the wildlife in the area; the removal of yet more open space. No project of this size should be allowed so near to neighborhoods. In addition to all of these negative aspects of the project, the failure to inform neighborhood residents unless they live within 300 feet is appalling, and shows that Humboldt County Planning and the applicant were trying to slip this in under the radar to avoid protests from residents.

I do not live in Arcata or near the project, but I have dear friends who do. They will be gravely, negatively affected by this project, as will their neighborhood and people who live anywhere nearby. I write in support of them, but also to express that no large scale cannabis project should be allowed anywhere in this County in an area that will destroy a neighborhood. I urge you to deny this application.

Cathy Rigby  
Eureka, CA

## Yandell, Rodney

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**From:** Monica Coyne <monicoyne@gmail.com>  
**Sent:** Tuesday, February 23, 2021 7:28 AM  
**To:** Yandell, Rodney  
**Subject:** Case No. CUP16-583

The Arcata Land Company, LLC Commercial Cannabis Outdoor Light-Deprivation and Mixed-Light Cultivation Project, Application No. 12255, Case No. CUP16-583.

Dear Senior Planner Rodney Yandell,

As a land owners in the Arcata Bottom We would like to comment on the Arcata Land Company Project.

We have a farm that is down stream from the Sun Valley Bulb Farm. The runoff, chemicals, sprays and traffic will affect us in a negative manner.

We have a small cannabis farm in Southern Humboldt county. We are not anti cannabis.

This proposed industrial mega grow is too big. Why permit one industrial grow for almost 1 million square ft? Giant corporate cannabis farms use money to bypass the regulations that are put there to protect us. They do what they want and pay the fines. We have all seen it. You could instead encourage hundreds of small farmers to grow small farms or to add cannabis to their existing crops. Small growers work within the regulations and live here and care about the community and environment. The county has been trying to market Humboldt County as a cannabis leader. Do we want to be known for industrial cannabis or for high quality, homegrown, conscientious small farming practices that will sustain our community and environment?

We would like to ask that the county:

1. Extend the comment period.
2. Demand an EIR. How did this happen without EIR? One million square feet? Conversion of Ag land? Increased traffic?
3. Give adequate community notification including the entire bottoms area.

Thank you for your time,  
Monica and Colum Coyne

## Yandell, Rodney

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**From:** Joan Edwards <johoda63@gmail.com>  
**Sent:** Tuesday, February 23, 2021 11:14 AM  
**To:** Yandell, Rodney  
**Subject:** Re: Huge cannabis grow - Arcata

Thank you for your response to my email. I'd like to add that the water demands of marijuana grows are huge and as I read further I discovered that the plan is to tap into the water table via a well system. That will completely drain every other well in the area without any compensation to those not taking the water for profit and now having to pay into the Humboldt Bay or City of Arcata water system. Another problem associated with this project. There needs to be an extension of the time limit for public comment. please.

Sincerely, Joan Edwards

On Mon, Feb 22, 2021 at 2:57 PM Yandell, Rodney <[RYandell@co.humboldt.ca.us](mailto:RYandell@co.humboldt.ca.us)> wrote:

Thank you for your comments. I will add them to the record for the review and consideration of the Planning Commission.

Thank you,



*Rodney Yandell*

Senior Planner  
Cannabis Services Division  
[Planning and Building Department](#)  
707.268.3732

**From:** Joan Edwards <[johoda63@gmail.com](mailto:johoda63@gmail.com)>  
**Sent:** Monday, February 22, 2021 2:42 PM  
**To:** Yandell, Rodney <[RYandell@co.humboldt.ca.us](mailto:RYandell@co.humboldt.ca.us)>  
**Subject:** Huge cannabis grow - Arcata

I am a resident of Arcata and am very concerned to have recently learned of the proposed massive grow between Foster and 27th St in Arcata. This is not an isolated property. It abuts neighborhoods, schools, and recreational areas. It will have a significant impact on the air and water quality of this area. The early plan of limiting large grows so to protect the smaller farmers seems to have been forgotten. And The reduction in property values as well as the increase in crime associated with this type of operation must be considered. I have written to Mike Wilson and to the

Humboldt County Planning and Building Department. Please slow down on this project before you make a grave error that will impact all of Arcata

Sincerely. Joan Edwards





Dear Supervisor Wilson and Humboldt County Planning and Building Department, 2/22/21

I was very alarmed to learn that the county has already approved the beginnings of a massive cannabis grow in the Arcata bottom adjacent to numerous homes, schools, and areas of recreation. This planned grow is the NINTH biggest grow in ALL of the United States and Canada. That's a pretty shocking figure. It was my impression that the county was trying to limit very large grows so to not undermine the local small growers. And yet, here we are. I have concerns about property values in the area plummeting, about the odor of such a huge farm of only marijuana, about the enormous water usage such an endeavor will require, about the impact to our local folks with respiratory conditions, about the increased traffic associated with such an enormous grow, about the light pollution of a greenhouse grow of this magnitude, and about the increase in crime associated with this big of a farm right next to residential neighborhoods. The fact that this has already passed through the early approval stages is shocking since the folks downwind and next door have only just begun to learn of the plan. It strikes me that if such a huge operation is warranted it would be better planned away from neighborhoods and schools. An EIR is absolutely essential in the process of approving such a massive development. I urge you to please consider my concerns and slow down on this process. The impacts of this are far reaching and will have a greater impact on the local community than anyone has even considered.

Sincerely,

Joan Edwards  
1800 27<sup>th</sup> St.  
Arcata, CA 95521  
[johoda63@gmail.com](mailto:johoda63@gmail.com)  
707-826-2826

## Yandell, Rodney

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**From:** Annie Bond <spotlightrose@gmail.com>  
**Sent:** Tuesday, February 23, 2021 11:23 AM  
**To:** Yandell, Rodney  
**Subject:** Arcata Land Company, LLC Commercial Cannabis Outdoor Light-Deprivation and Mixed-Light Cultivation Project

Hi Mr. Yandell,

I am a young adult resident of Humboldt County. My family has been cultivating cannabis since the mid-70s. The way legalization has evolved throughout my youth and into my young adulthood has broke my heart. All the adults in my life can't financially support themselves the way they used to. And by 'used to' I mean it was still very hard work. Please do not let this commercial cannabis grow go in. It is ecologically devastating and it will directly negatively impact our community. There are major corporate entities coming into Humboldt only because the name has value in the cannabis industry. That is what gentrification is. Please do not let this happen! Our community and our ecosystem cannot afford to have outsiders financially benefiting and taking that money away from our community. Our name is being used and we aren't able to support ourselves with it anymore.

Thank you for your time,

Annie Bond

ANNIE BOND M: 707-407-8040 E: [spotlightrose@gmail.com](mailto:spotlightrose@gmail.com) Ritz LLC • Envision LLC • BM Center Camp Cafe Culture Jam • Camp Winnarainbow • YES! Kinetic Grand Championship • Intents • GG

## Yandell, Rodney

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**From:** lee torrence <ltwish@hotmail.com>  
**Sent:** Tuesday, February 23, 2021 12:38 PM  
**To:** Yandell, Rodney  
**Subject:** Cannabis

Hello Humboldt County Planning and Building Department,

I received a letter from the county regarding the proposed commercial grow: PROJECT TITLE: ARCATA LAND COMPANY, LLC COMMERCIAL CANNABIS OUTDOOR LIGHT-DEPRIVATION AND MIXED-LIGHT CULTIVATION PROJECT. APPLICATION NUMBER; 12255, CASE NUMBER; CUP 16-583

We are advised that the public has until Feb. 26 to send comments. Many of our neighbors (especially those closest to the proposed grow) did not receive letters from the planning and building commission. We are all wondering why?

I was surprised to see an article published on the Lost Coast Outpost on Feb. 9 (<https://lostcoastoutpost.com/2021/feb/9/today-supes-february-9-2021/>) stating that the Humboldt County Planning commission voted UNANIMOUSLY to ban all large-scale industrial hemp grows. This decision was based on the concerns of local cannabis growers about their crops being cross contaminated.

You have a 1400 page proposal from Arcata Land Company trying to address EVERY possible opposition they might have from neighbors, and the Planning Commission puts a moratorium on industrial hemp grows because of the concerns of LOCAL CANNABIS GROWERS?!

I truly hope that you will take just as seriously the concerns of us who live in the area, who will daily be exposed to this proposed industrial cannabis grow, and those who use the roads that will be impacted by increased traffic, and even those who live in the hills who will look down upon it.

Since the last paragraph of the article says the board can revoke the "permanent" moratorium at any time, I'd like to express my concerns.

1. AIR QUALITY - I think most of us would agree that the smell of skunk is an assault on our senses. The Arcata Land Company (Sun Valley Bulb Farm) says they are going use a special filtration system inside the hoop greenhouse to minimize the odor, but a grow near West End uses a filtration system and there is still an odor of skunk during harvest time. I spent 3 weeks last summer in my house with the windows closed because California was on fire, and would have worn a mask even if there wasn't a pandemic. Our precious air quality is already at risk. I know people who have had to move from areas near grows in Willow Creek and Redway because of their extreme sensitivity to cannabis. We have one such person in our neighborhood. She has an extreme allergy which causes asthmatic symptoms. I'm sure she is not alone. Many children these days have asthma. I believe there are 3 schools within 2000 feet from this proposed grow. Can we provide a better childhood for them, considering the state of the planet?
- 2) LIGHT - They say this is a LIGHT-DEPRIVATION AND MIXED-LIGHT CULTIVATION PROJECT. I looked that up and it sounds like the use of artificial lighting between 6 and 25 watts per square foot of canopy. At one point in the 1500 page proposed project, it says the only lights will be security lights which will be facing downward. But somewhere else it says that there will be 193 new hoop greenhouses with 25% of those operating with mixed light and artificial light. I don't believe the Arcata Bottoms has the best climate for growing cannabis and it seems to me that if this passes, you'll need to be on top of that and make sure that 25% doesn't increase.

If you want to see what light pollution looks like in the bottoms, while driving south on 101 near the exit of Giuntoli, look to the west. Sun Valley has some lights that set the sky aglow at night. I'm from Chicago, and when I first saw this glow in the Arcata Bottoms I was reminded of the huge energy plants glowing in the distance as you approach a large metropolitan area. I was so baffled by the glow, that after I got home, I got back in my car and drove over there to see what it could be. I was quite shocked to see it was Sun Valley Bulb Farm.

At this point I will mention 3 other commercial grows proposed within a 1 mile radius of the Arcata Land Company (Sun Valley Bulb Farm) Commercial Cannabis Cultivation Project.

1) The Ryan Simas Commercial grow. 10,000 sq. ft. New mixed-light commercial cannabis cultivation and 4000 square feet of new indoor cannabis cultivation. Water supplied by a proposed well.

2) Park Meadow Estates: 10,000 sq. ft. New mixed-light commercial grow. Water supplied by a proposed well.

3) WE Produce: New 160,680 sq. ft. indoor commercial cannabis operation and 30,000 sq. ft. commercial cannabis nursery. Water supplied by rainwater catchment.

So, FOUR proposed grows between Foster and 27th Street or to Upper Bay Road. One of our neighbors on the west side of 27th Street borders Sun Valley's property. They see the constant glow from only 16 of the bulb farm's structures that use lights.

We are the last house in Arcata on 27th Street. The night sky is breathtaking on a clear night. I imagine star gazing will be out of the question with the addition of so much lighting? (Wikipedia: **Light pollution** is the presence of [anthropogenic](#) and artificial light in the night environment. It is exacerbated by excessive, misdirected or obtrusive use of light, but even carefully used light fundamentally alters natural conditions. As a major side-effect of [urbanization](#), it is blamed for compromising health, disrupting ecosystems and spoiling aesthetic environments.) The extra lighting will change the landscape below for everybody who lives up on the hillside, too. So, it won't just effect us in the bottoms. When one thinks of agriculture, one does not think of **LIGHTING**. Growing cannabis is different from regular agriculture. This should be taken into consideration when granting the right to use agriculturally zoned land.

3) Water. Quantity? **Many farmers in the Arcata Bottoms pump water from this aquifer. A proper study needs to be conducted to ascertain the impact of the proposed 52 acre feet of water that the proposed cannabis will use per year.**

How does this effect other farmers (DeepSeeded Farm)? Pesticides in our groundwater? Pesticides ending up in our marsh? Pesticides killing wildlife? Are we willing to sacrifice this too?

4) NOISE POLLUTION! It is so quiet where I live, I can hear the ocean at night and I'm 1.5 miles away. I hear fans will be used and wonder how that will affect wildlife. Will those living nearby be able to hear them? With fires a constant threat and shutdowns of electricity by PG&E, is there a chance that generators will be used?

5) SECURITY - CANNABIS is a valuable crop. The Sun Valley Bulb Farm planted eucalyptus trees on the south side of 27th street so people wouldn't steal their bulbs and flowers. Imagine the security needed for cannabis!? Will they also employ threatening, barking dogs we can listen to at night? Will they be hiring security guards with guns? Will we have to worry about criminal elements in our neighborhood? What are the unexpected impacts of growing a valuable crop like this in our community?

6) Environmental Impact Report. The Biological Assessment conducted by SHN for this initial study did not include several species of birds that are often observed on or over the study site according to James Cotton, a retired federal wildlife biologist and avid birdwatcher who lives about 900 feet from the project site. Additionally, this was only a ONE DAY on-site observation according to the study, so it is not surprising that they said they did not see any birds. The day this was conducted was outside the migration for seasonal birds, for example geese. Mr Cotton has also seen numerous species that were not listed in the report.

7) TRAFFIC - The proposed project is expected to result in 232 new trips per day during peak operation, including 40 trips during the a.m. peak hour and 37 trips during the p.m. peak hour. How much traffic do we want to see at Foster and Alliance? Add to this the 3 other proposed commercial cannabis grows using the same route. Let's not forget the proposed single family, multiple family and assisted living residential development that will provide housing for approximately 269 residents at Foster and Alliance.

8) COST OF ROAD IMPROVEMENTS - A mini-roundabout at Foster and Alliance (\$325,000), and 101 North Ramp/Sunset (\$3,125,000). On page 1278 of the proposal, The Arcata Land Company will be charged approximately \$25,000 for these improvements. That leaves the rest of the bill to the residents of Arcata. Why? For the benefit of a private venture?

9) JOBS - There is hope that this will add jobs to the community. Is it a more likely scenario that lower paid seasonal workers will come from out of the area to fill these jobs?

My husband moved here in 1990. He remembers Arcata residents given a choice to vote for a housing development to be built down 27th or allow Sun Valley Bulb Farm to move into this neighborhood. The people voted for the bulb farm thinking it would keep the population and traffic down and maintain the quiet ambiance of the neighborhood. Now Sun Valley turns their back on the community that invited them in and threatens to change the quality of life people in this area have so enjoyed. QUIET, LOW LIGHT, LOW TRAFFIC, AND FRESH AIR. Is that how you repay people who welcomed your business into their community? Is that showing gratitude, or just plain greed?

It was 10-12 years after Sun Valley started their operation when we on 27th Street started to see huge trucks moving massive amounts of dirt up and down our street several times a day. Was use of our residential street agreed upon from the start, or are they supposed to be using the Upper Bay Road entrance? Are they paying for the wear and tear for the use of this street? Companies agree to one thing when given permission to set up business. Then, years down the road, regulations get broken. One needs to only imagine who our new neighbors will be, what regulations will get broken, and how our quality of life will suffer because of it.

I'm sure the county is thinking of the revenue they will receive from taxation of these grows. With climate change and California under constant threat of fire, quality of life should be first and foremost in decision making regarding the residents of our county.

We live in a unique place of the country and the world. Let's keep it that way.

Very Sincerely,

Lee Torrence  
David Mohrmann  
1827 27th. Street  
Arcata, CA 95521

Helo Rodney,

Thank you for accepting our comments. It's very unfortunate that the folks in the bottoms and Arcata as a whole have not been adequately informed of this project. I hate to sound cynical, but it's typical, I suppose, given the state of the country and the world. Why should we expect any more from our community? I guess the holy dollar always wins over quality of life and those in power do whatever it takes to move their agenda forward, even if that means not informing those they represent and whom those decisions will impact. Again, I apologize for sounding so jaded.

Truly disappointed,  
Lee Torrence



## Yandell, Rodney

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**From:** Dwight Winegar <dwhytefeather@sbcglobal.net>  
**Sent:** Tuesday, February 23, 2021 1:21 PM  
**To:** Yandell, Rodney  
**Subject:** Cannabis proposal by Sun Valley for Arcata Bottoms area

I'm just reading about this, and this sounds like this NEEDS an extension of public commentary time, as the facts seem to be different than what a number of us had previously heard from the City of Arcata and Mad River Union on this location and subject. This is much larger and previously we were told it would be INSIDE the old hanger building. Now we are learning that this is to be outside in "hoop style" greenhouses. This raises many new questions about exposure of lighting, where the estimates of traffic flow are coming from and why, excessive odor in the community, and other new issues. Meanwhile how will this blend in collectively with even MORE grows under consideration within one radius mile of this site?

- Dwight Winegar  
Arcata, CA

## Yandell, Rodney

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**From:** Paul C Cummings <paul.cummings@humboldt.edu>  
**Sent:** Tuesday, February 23, 2021 9:57 PM  
**To:** Yandell, Rodney  
**Subject:** proposed new grow in Arcata bottoms

Hello,

I'm writing to voice my objection to the new proposed grow near Foster, Alliance, and 27th Avenue in Arcata. I am opposed to this project because I believe an EIR is necessary even if not required by law. An enormous amount of water will be needed to grow this marijuana crop. Also, more information is needed concerning the impact of the project on bird and other animal life.

Thanks for listening.

Paul

Paul Cummings, DMA  
*Professor of Music | Coordinator of Music Education*  
Humboldt State University | Department of Music  
1 Harpst Street | Arcata, CA 95521  
707-826-5435 / [pcc6@humboldt.edu](mailto:pcc6@humboldt.edu)



Hello Humboldt County Planning and Building Department,

I received a letter from the county regarding the proposed commercial grow:  
PROJECT TITLE: ARCATA LAND COMPANY, LLC COMMERCIAL CANNABIS  
OUTDOOR LIGHT-DEPRIVATION AND MIXED-LIGHT CULTIVATION  
PROJECT. APPLICATION NUMBER; 12255, CASE NUMBER; CUP 16-583

We are advised that the public has until Feb. 26 to send comments. Many of our neighbors (especially those closest to the proposed grow) did not receive letters from the planning and building commission. We are all wondering why?

Here are my concerns:

1) AIR QUALITY - I think most of us would agree that the smell of skunk is an assault on our senses. The Arcata Land Company (Sun Valley Bulb Farm) says they are going use a special filtration system inside the hoop greenhouse to minimize the odor, but a grow near West End uses a filtration system and there is still an odor of skunk during harvest time. I spent 3 weeks last summer in my house with the windows closed because California was on fire, and would have worn a mask even if there wasn't a pandemic. Our precious air quality is already at risk. I know people who have had to move from areas near grows in Willow Creek and Redway because of their extreme sensitivity to cannabis. We have one such person in our neighborhood. She has an extreme allergy which causes asthmatic symptoms. I'm sure she is not alone. Many children these days have asthma. I believe there are 3 schools within 2000 feet from this proposed grow. Can we provide a better childhood for them, considering the state of the planet?

2) LIGHT - They say this is a LIGHT-DEPRIVATION AND MIXED-LIGHT CULTIVATION PROJECT. I looked that up and it sounds like the use of artificial lighting between 6 and 25 watts per square foot of canopy. At one point in the 1500 page proposed project, it says the only lights will be security lights which will be facing downward. But somewhere else it says that there will be 193 new hoop greenhouses with 25% of those operating with mixed light and artificial light. I don't believe the Arcata Bottoms has the best climate for growing cannabis and it seems to me that if this passes, you'll need to be on top of that and make sure that 25% doesn't increase.



If you want to see what light pollution looks like in the bottoms, while driving south on 101 near the exit of Giuntoli, look to the west. Sun Valley has some lights that set the sky aglow at night. I'm from Chicago, and when I first saw this glow in the Arcata Bottoms I was reminded of the huge energy plants glowing in the distance as you approach a large metropolitan area. I was so baffled by the glow, that after I got home, I got back in my car and drove over there to see what it could be. I was quite shocked to see it was Sun Valley Bulb Farm.

At this point I will mention 3 other commercial grows proposed within a 1 mile radius of the Arcata Land Company (Sun Valley Bulb Farm) Commercial Cannabis Cultivation Project.

1) The Ryan Simas Commercial grow. 10,000 sq. ft. New mixed-light commercial cannabis cultivation and 4000 square feet of new indoor cannabis cultivation. Water supplied by a proposed well.

2) Park Meadow Estates: 10,000 sq. ft. New mixed-light commercial grow. Water supplied by a proposed well.

3) WE Produce: New 160,680 sq. ft. indoor commercial cannabis operation and 30,000 sq. ft. commercial cannabis nursery. Water supplied by rainwater catchment.

So, FOUR proposed grows between Foster and 27th Street or to Upper Bay Road. One of our neighbors on the west side of 27th Street borders Sun Valley's property. They see the constant glow from only 16 of the bulb farm's structures that use lights.

We are the last house in Arcata on 27th Street. The night sky is breathtaking on a clear night. I imagine star gazing will be out of the question with the addition of so much lighting? (Wikipedia: **Light pollution** is the presence of [anthropogenic](#) and artificial light in the night environment. It is exacerbated by excessive, misdirected or obtrusive use of light, but even carefully used light fundamentally alters natural conditions. As a major side-effect of [urbanization](#), it is blamed for compromising health, disrupting ecosystems and spoiling aesthetic environments.). The extra lighting will change the landscape below for everybody who lives up on the hillside, too. So, it won't just effect us in the bottoms. When one thinks of agriculture, one does not think of **LIGHTING**. Growing cannabis is different from regular agriculture. This should be taken into consideration when granting the right to use agriculturally zoned land.

3) **Water. Quantity?** Many farmers in the Arcata Bottoms pump water from this aquifer. A proper study needs to be conducted to ascertain the impact of the proposed 52 acre feet of water that the proposed cannabis will use per year. I saw a 60 minute segment about the depletion of the water aquifer in the valley. It's almost completely gone!

How does this effect other farmers (DeepSeeded Farm)? Pesticides in our groundwater? Pesticides ending up in our marsh? Pesticides killing wildlife? Are we willing to sacrifice this too?

4) **NOISE POLLUTION!** It is so quiet where I live, I can hear the ocean at night and I'm 1.5 miles away. I hear fans will be used and wonder how that will affect wildlife. Will those living nearby be able to hear them? With fires a constant threat and shutdowns of electricity by PG&E, is there a chance that generators will be used?

5) **SECURITY - CANNABIS** is a valuable crop. The Sun Valley Bulb Farm planted eucalyptus trees on the south side of 27th street so people wouldn't steal their bulbs and flowers. Imagine the security needed for cannabis!? Will they also employ threatening, barking dogs we can listen to at night? Will they be hiring security guards with guns? Will we have to worry about criminal elements in our neighborhood? What are the unexpected impacts of growing a valuable crop like this in our community?

6) **Environmental Impact Report.** The Biological Assessment conducted by SHN for this initial study did not include several species of birds that are often observed on or over the study site according to James Cotton, a retired federal wildlife biologist and avid birdwatcher who lives about 900 feet from the project site. Additionally, this was only a ONE DAY on-site observation according to the study, so it is not surprising that they said they did not see any birds. The day this was conducted was outside the migration for seasonal birds, for example geese. Mr Cotton has also seen numerous species that were not listed in the report.

7) **TRAFFIC** - The proposed project is expected to result in 232 new trips per day during peak operation, including 40 trips during the a.m. peak hour and 37 trips during the p.m. peak hour. How much traffic do we want to see at Foster and Alliance? Add to this the 3 other proposed commercial cannabis grows using the same route. Let's not forget the proposed single family, multiple family and assisted living residential development that will provide housing for approximately 269 residents at Foster and Alliance.

8) COST OF ROAD IMPROVEMENTS - A mini-roundabout at Foster and Alliance (\$325,000), and 101 North Ramp/Sunset (\$3,125,000). On page 1278 of the proposal, The Arcata Land Company will be charged approximately \$25,000 for these improvements. That leaves the rest of the bill to the residents of Arcata. Why? For the benefit of a private venture?

9) JOBS - There is hope that this will add jobs to the community. Is it a more likely scenario that lower paid seasonal workers will come from out of the area to fill these jobs?

10) RATS - We are the last house in town on 27th Street. We always have rats running around. From what I hear RATS LOVE MARIJUANA and it is a CONSTANT BATTLE growers have with them. What pesticides will they be using to control the rats? How will that effect wildlife?? Our water table? More poison run off into the slough and marsh?

My husband moved here in 1990. He remembers Arcata residents given a choice to vote for a housing development to be built down 27th or allow Sun Valley Bulb Farm to move into this neighborhood. The people voted for the bulb farm thinking it would keep the population and traffic down and maintain the quiet ambiance of the neighborhood. Now Sun Valley turns their back on the community that invited them in and threatens to change the quality of life people in this area have so enjoyed. QUIET, LOW LIGHT, LOW TRAFFIC, AND FRESH AIR. Is that how you repay people who welcomed your business into their community? Is that showing gratitude, or just plain greed?

It was 10-12 years after Sun Valley started their operation when we on 27th Street started to see huge trucks moving massive amounts of dirt up and down our street several times a day. Was use of our residential street agreed upon from the start, or are they supposed to be using the Upper Bay Road entrance? Are they paying for the wear and tear for the use of this street? Companies agree to one thing when given permission to set up business. Then, years down the road, regulations get broken. One needs to only imagine who our new neighbors will be, what regulations will get broken, how our quality of life and will suffer, and what irreversible environmental damage will be caused.

I'm sure the county is thinking of the revenue they will receive from taxation of these grows. With climate change and California under constant threat of fire, quality of life should be first and foremost in decision making regarding the

residents of our county and more importantly protecting this precious environment in which we are so fortunate to live. New information is coming forward exactly how devastating huge industrial grows impact the environment. We need to look into this more seriously before going ahead. My husband and I oppose this project wholeheartedly.

Very Sincerely,

A handwritten signature in black ink, appearing to read "Lee Torrence", followed by a long, horizontal, wavy line that extends to the right.

Lee Torrence  
David Mohrmann  
1827 27th. Street  
Arcata, CA 95521

## Yandell, Rodney

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**From:** Ford, John  
**Sent:** Wednesday, February 24, 2021 6:47 PM  
**To:** Yandell, Rodney  
**Subject:** FW: Cannabis



John H. Ford  
Director  
[Planning and Building Department](#)  
707.268.3738

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**From:** Wilson, Mike <Mike.Wilson@co.humboldt.ca.us>  
**Sent:** Wednesday, February 24, 2021 4:07 PM  
**To:** Ford, John <JFord@co.humboldt.ca.us>  
**Subject:** Fwd: Cannabis

Mike Wilson P.E.  
Humboldt County Supervisor, District 3  
707.476.2393

Sent from my iPad

Begin forwarded message:

**From:** "[charlie.jordan1@gmail.com](mailto:charlie.jordan1@gmail.com)" <[charlie.jordan1@gmail.com](mailto:charlie.jordan1@gmail.com)>  
**Date:** February 24, 2021 at 9:55:10 AM PST  
**To:** "Wilson, Mike" <[Mike.Wilson@co.humboldt.ca.us](mailto:Mike.Wilson@co.humboldt.ca.us)>  
**Subject:** Cannabis

Hi Mike – Your favorite subject...cannabis. Below is posted on the Sunnybrae Nextdoor site. Looks like neighbors are getting a campaign together to push back on this proposed development.

My concerns are water and sewer impact and overall added expenses to City infrastructure such as roads, police, fire. If passed/ allowed, how much will

the developer be responsible for upgrading and/or contributing to offset costs?

Appreciate your support and interested in your input.

Thank you,  
Charlie

[9th Largest cannabis grow.](#) Hello, I'm very concerned about HUGE cannabis grow that is proposed for the Arcata Bottoms. Only a few of us on 27th Street received a letter from the Planning and Building Department. The Arcata Land Company's (Sun Valley Bulb Farm) proposed grow will be 22.9 acres. Located between Foster and 27th Street next to the old Simpson Lumber buildings. 193 hoop green houses. = 1 million square feet of grow. My concerns are: SKUNK ODOR LIGHT POLLUTION: Will be 25% artificial lighting INCREASED TRAFFIC at Alliance and Foster. 232 new trips per day. INCREASE IN CRIME? Please take into account that there are 3 other proposed grows within 1 mile radius from the Arcata Land Company's. Please make your concerns heard by Friday, Feb. 26th. Watch for Humboldt County Planning Commission's future public hearing on this. (Zoom) Comments can be sent to Rodney Yandell, Senior Planner at [ryandell@co.humboldt.ca.us](mailto:ryandell@co.humboldt.ca.us) 707-445-7541 or mailed to: Humboldt County Planning and Building Department 3015 H Street Eureka, CA 95501 Call Supervisor Mike Wilson 707-825-2300 to request an extension of comment time because so many of us have not been made aware of these critical changes to our neighborhood..

Charlie Jordan  
707-616-5916

Charlie Jordan  
707-616-5916



## Yandell, Rodney

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**From:** Ford, John  
**Sent:** Wednesday, February 24, 2021 6:48 PM  
**To:** Yandell, Rodney  
**Subject:** FW: Arcata Land Company proposal



John H. Ford  
Director  
[Planning and Building Department](#)  
707.268.3738

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**From:** Wilson, Mike <Mike.Wilson@co.humboldt.ca.us>  
**Sent:** Wednesday, February 24, 2021 3:43 PM  
**To:** Ford, John <JFord@co.humboldt.ca.us>  
**Subject:** Fwd: Arcata Land Company proposal

See below.

M

Mike Wilson P.E.  
Humboldt County Supervisor, District 3  
707.476.2393

Sent from my iPad

Begin forwarded message:

**From:** Joan Edwards <[johoda63@gmail.com](mailto:johoda63@gmail.com)>  
**Date:** February 24, 2021 at 2:09:57 PM PST  
**To:** "Wilson, Mike" <[Mike.Wilson@co.humboldt.ca.us](mailto:Mike.Wilson@co.humboldt.ca.us)>  
**Subject:** Arcata Land Company proposal

I urge you to slow down on then proposed massive grow just outside of the Arcata City limits. If such a decision is made it could be pushed further away from existing neighborhoods so to lessen the impact of odor and light pollution as well as decrease the possible increase in crime to the surrounding neighborhoods. I also urgent you to require them to pay for water via HUmboldt bay and not be allowed to take the amount of water they will need for such an extended grow out of the aquifer that feeds all of the bottoms and local neighbors with wells. When a farm operates for profit they should not be allowed to drain all available water away from their neighbors. Please slow down on this plan and make the RIGHT decisions. Further away would mean less impact. Thank you  
Joan Edwards

## Yandell, Rodney

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**From:** Tristin Oates <tristinoates@gmail.com>  
**Sent:** Wednesday, February 24, 2021 7:00 PM  
**To:** Yandell, Rodney  
**Subject:** 1 million square feet, awful!

Hello, I absolutely oppose this project! It isn't good for the industry, neighborhoods, workers, or the birds. This project is the worst for small growers of humboldt and others throughout California. Why the state didn't keep the 4 acre cap, ugh, projects like this do not encourage a diverse and vibrant industry.

Thanks,  
Tristin



## Yandell, Rodney

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**From:** Little Brain <littlebrainmusic@gmail.com>  
**Sent:** Wednesday, February 24, 2021 7:34 PM  
**To:** Yandell, Rodney  
**Subject:** Sun Valley

Based on the overall appeal to emotion over keeping his employees working... He doesn't seem to care whether they are paid a living wage, or for the inevitable overtime it will take the number of employees he expects to run such a massive operation.

This seems like a greedy local business man, quadrupaling his current operations, and switching to a much more labor intensive plant to cultivate. Everything about this, screams 'out of touch.'

Perhaps a better, more realistic decision would be to decline the advancement of this project, and approve the 6 acres that are currently available for cultivation. Perhaps then, Mr. DeVries will have a better understanding for how much work the endeavor would truly take. He is in for a rude awakening if he thinks the current minimum wage is anywhere near the going rate for cannabis labor in Humboldt county.

## Yandell, Rodney

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**From:** Dave Hollowell <dave.hollowell@yahoo.com>  
**Sent:** Wednesday, February 24, 2021 8:17 PM  
**To:** Yandell, Rodney  
**Subject:** Sun Valley Cannabis development

Mr Yandell,

My name is David, I am writing this in regards to the proposal of the Sun Valley Cannabis project.

While I understand there are certain stipulations to giving notice on projects to the community. It is extremely disturbing and does not seem like a

good way to practice communicating with the local population by only giving notice of 500 feet around a project of this magnitude. I strongly urge that

the planning department and the city change this policy to a larger scope of giving notice to the community.

Giving that we live in Humboldt County we all understand that Cannabis is a way of life here, however that does not warrant creating a facility

of this magnitude within Arcata I am sure that sun valley has the resources and means to be able to build and start an operation in a different area

that would not effect the entire "bottoms" population.

Building a facility of this size would not help the cannabis industry here it would hinder it.

I also have a major concern of the amount of traffic this would create, in an area that would not normally have between 150-200 vehicles traveling on

multiple times a day. We are talking about adding travel through neighborhoods and next to schools that would be extremely effected by this.

Lastly the fact that this would be going in right next to two schools less than a mile away?? This just raises a huge red flag that this is not the area

to be putting in an industrial grow site.

I would like to verbally express that I am deeply disappointed with the city regarding this issue.

I am extremely opposed to this project as I am sure you will be hearing from many other members of the community who are in agreement with me

regarding this.

Sincerely,

David Hollowell

## Yandell, Rodney

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**From:** lisa heikka <honeycutt77@hotmail.com>  
**Sent:** Wednesday, February 24, 2021 8:59 PM  
**To:** Yandell, Rodney  
**Subject:** Sun Valley Cannabis Farm Dispute

Dear Rodney Yandell,

As a resident of the Arcata bottoms I was angered and shocked to read in the news that residents only had a few days left to make comment to the required 30 day notice period regarding the proposed Sun Valley transformation from tulip cultivators to massive capitalist marijuana manufacturers. To act in bad faith by only publishing this notice a few day ago when deadline is this Friday is outrageous. In addition an MND is not sufficient to recognize the plethora of violations implementing an infrastructure of this capacity will commit. This is cause negativity impacts to the community, the area's endangered bird life, take more water from the ground supply then the region has to spare; as well as negatively impact the sewer and water system of the area whether attached or not to city services. The traffic in the bottoms is already too much for the small poorly maintained roads and any unnecessary development such as this project will only make it worse.

Furthermore attempting to annex agriculture only lands from long established members of the community is a gross disregard to their personhood as members of our local society, suggesting their land ownership over 80 years is no longer in line with Arcata city planning is unacceptable.

I am a hone owner on Blakeslee Ave and this little two block street constantly has people driving down and up it at speeds past 40 miles an hour because there are no speed signs, no speed bumps and it is the through route between Alliance road to rt255 the back way. We need transparency in city development and this is. Or it. Stop ignoring existing issues within Arcata instead of focusing on pipe dream development projects that will negatively impact our community. Sun Valley is already polluting the air, water and ground while trying to find a way not to pay its workers the overtime they deserve to top it off.

No to Sun Valley Cannabis project!!!!!!

Elizabeth Heikka-Huber

## Yandell, Rodney

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**From:** Nicholas turkette <nicholas.turkette@gmail.com>  
**Sent:** Wednesday, February 24, 2021 9:44 PM  
**To:** Yandell, Rodney  
**Subject:** No to the arcata land company llc projects.

Hi we live within 500 ft from the huge ex Simpson timber buildings on foster ave.

We're absolutely not into this grotesquely sized grow and operation that is planned.

As immediate neighbors, we should have been better notified! WTF? Shows how the county planning dept feels about it's non weed greed rich people.

So for whatever it's worth, we're farmers of the arcata bottoms , and we're absolutely opposed to these projects getting pushed through. The traffic will make this road very unsafe for our children, livestock and pets.

Completely change the sights, sounds and smells of the area. Bring in unwanted out of town investment B\$. And generally make it worse to live down here.

Property values?

Light pollution?

Water pollution?

Migratory bird safety?

Road upkeep?

It's just absurd.

Thanks

Nick Turkette

## **Yandell, Rodney**

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**From:** Miranda Jones <mljtalkalot@gmail.com>  
**Sent:** Wednesday, February 24, 2021 10:56 PM  
**To:** Yandell, Rodney  
**Subject:** Sun valley

As a full time resident who has gone from warehouse work to washing dishes (all deemed necessary and important during covid), and is now jobless; it is reassuring to know that there is the potential to employ 150 local residents year round. I for one am excited for this project and what it will bring to the community!

Miranda Jones  
Sent from my iPhone

## Yandell, Rodney

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**From:** Ford, John  
**Sent:** Thursday, February 25, 2021 5:58 AM  
**To:** Yandell, Rodney  
**Subject:** FW: Foster ave cannabis permits?

John H. Ford

Director

Planning and Building Department

707.268.3738

-----Original Message-----

**From:** Nicholas turkette <nicholas.turkette@gmail.com>  
**Sent:** Wednesday, February 24, 2021 9:18 PM  
**To:** Ford, John <JFord@co.humboldt.ca.us>  
**Subject:** Foster ave cannabis permits?

Mr. Ford,

I'm writing because I've recently become aware of multiple large scale cannabis permits being applied for on foster ave in the arcata bottoms.

We live directly next door ( to the west) to Sun Valley and the gigantic permit that The arcata land company llc is applying for. We may lose the lease on the grazing and vegetable production pasture we rent from sun Valley because of this project.

And even if we don't, we are worried about the pollution to the water that could occur.

There are also 2? Other permits pending just to the East of that. The quiet and safe agricultural community we live in could be greatly disrupted by the huge increase in traffic these grows and processing facilities will bring in.

Aside from potential,air, water, sound and light pollution that will almost for sure accompany these projects, the roads are just not meant to handle this increase in activity. The county has failed to repair the roads out here for years And they will just get worse. Many people walk, bike and work along Foster ave , Bay school rd and Jane's rd. These will all be deeply impacted by the huge amount of traffic buzzing though here.

There's commonly livestock around, many migratory birds and sensitive watersheds and wells that will all be affected too.

We grow food. We farm. We're not getting rich , they already are, and these projects will negatively impact our local food community and livelihood.

I'm unsure as to the formal specific things I'm supposed to say If I want this to go on public record. But I'm opposed to any of these projects On foster ave receiving a permit.

Thanks,  
Nicholas Turkette

February 23, 2021

Humboldt County Planning and Building Department  
3015 H Street  
Eureka, CA 95501

RE: Arcata Land Co., LLC commercial Cannabis Outdoor-Light-Deprivation and mixed-Light Cultivation Project, Application Number: 12255, Case Number: CUP 16-583.

Dear Humboldt County Planning Commission:

*This letter is to communicate our absolute disapproval of the proposed Commercial Cannabis project by the Arcata Land Company, LLC.*

Our concerns are due to the following:

**Pollution...**

Research shows that cannabis plants produce volatile organic compounds or VOCs that can produce harmful pollutants.

Cannabis emits potent VOCs called terpenes that, when mixed with nitrogen oxide and sunlight, form ozone-degrading aerosols. In an area where normally there are few sources of VOCs, any new source of such pollutants will likely lead to ground-level ozone production. A significant number of cannabis plants being grown will become the regular source of VOCs, exacerbating the issue by combining with the man made nitrogen oxide spewed from the many cars in that urban environment. Also high concentrations of VOCs have been linked to a range of human health issues, from nausea and fatigue to liver damage and cancer.

**Irrigation problems...**

A hefty cannabis plant needs several gallons of water per day in the rain less summer growing season, which does not sound like much until you multiply it by thousands of plants. According to the United State Drought Monitor, Humboldt County as of Feb. 18, 2021 is in D0 (Abnormally Dry). They plan to use well water which will deplete our own well water.

**Pestilence ...**

Another threat is increase in rats, which are drawn to the aromatic, sticky foliage of the cannabis plant. We already have an exorbitant amount of rat population; we do not need to add to it. Another problem is due to the rat population the long-acting rodent poison warfarin, which has begun making its way up the food chain to predators. A study last year in the online scientific journal PLOS One, found predators have rat poison in their bloodstream and attributed it to absorption through their prey.



**Excessive Energy usage...**

Studies show an outsize carbon footprint to power the electric-intensive lights, fans and pumps that it takes to raise plants. The carbon footprint of a single gram of cannabis is the same as driving seventeen miles in a Honda Civic.

The energy used by converted warehouses by urban dispensaries, and the impact is significant estimated at 3 percent of the state's total power bill, or the electricity consumed by 1 million homes. On a local level, indoor cannabis production is blocking climate stabilization efforts in the coastal city of Arcata, which aimed to cut its greenhouse gas emissions by 20 percent over twelve years. But during the first half of that period, while electricity consumption was flat or declining slightly statewide, Arcata's household electrical use grew by 25 percent. City staff traced the increase to more than 600 houses that were using at least triple the electricity of the average home—a level consistent with a commercial cannabis operation.

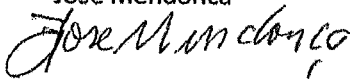
**Increase traffic and noise pollution...**

The applicant estimates that the facility would generate 102 to 228 vehicles trips per day on Foster Avenue, presumably including both employee vehicles and trucks there to pick up shipments. The CUP application states the cannabis facility's hours as 7 a.m. to 7 p.m., though the cultivation side would operate up to 16 hours per day and the manufacturing work could continue around the clock, "pending on demands."

Because of these reasons, we strongly suggest that Arcata Land Co., LLC not be allowed to continue their commercial cannabis project at their current requested location at the old Simpson Mill and current Sun Valley Floral Farm.

Regards,

Jose Mendonca



February 24, 2021

Humboldt County Planning Commission  
3015 H Street  
Eureka, CA 95501

Mr. Rodney Yandell  
Lead Contact for SCH Number 2021010337  
Arcata Land Company, LLC Commercial Cannabis Outdoor Light-Deprivation and Mixed-Light Cultivation Project

Mr. Yandell,

As a concerned citizen of Humboldt County I am writing in strong opposition to approval for the above project submitted by Arcata Land Company, LLC, to be located at Foster Avenue and Janes Road, Parcel # 506-231-021 and 505-151-011.

This is a very disruptive project with a very short public comment period and failure to notify all the residents who will be impacted or own property that borders the proposed parcels for development. This quiet rural neighborhood should be developed to provide affordable housing for our community. The suggested use as an outdoor cannabis farm with outdoor lighting will dramatically and negatively affect the environment in so many ways, including but not limited to light and noise pollution, air pollution including noxious odors, vastly increased traffic, and significant negative impact on the local native flora and fauna. There is a high potential for contaminating the local human residents, wildlife, and the area wetlands and waterways with chemicals, pesticides, and fertilizers. It is a significant negative impact to the area. Two single days for Biological Resource Assessment are inadequate for reasonable observation of impacts on flora and fauna.

Surely we have learned about the hazards associated with industrial agriculture. This project has no value in the neighborhood community and is not in line with conservation goals. The negative declaration is false and not enough time was spent in observing impacts on migrating wildlife and seasonal flora. The open lands and Greenbelt would be lost forever. The immediate local residents who would bear the brunt of this industrial agriculture impact were never given notice about the potential development, and the comment period is absurdly short with only 30 days. The report I am struggling to fully read runs >1400 pages. It's been a short week since community neighbors spread the devastating news to the uninformed citizens. **A full Environment Impact Report should be prepared and made available for public review and comment before consideration of permit approval by the Humboldt County Planning Commission.**

I support the cannabis industry in a location that is compatible for industry. A project of this size, at one million square feet of new cultivation, has **no** place in a rural neighborhood that needs affordable housing.

Please acknowledge receipt of my complaint and add my contact information for any additional actions about this project. I vote in every election.

Sincerely, Catherine Hart

[cathihart@yahoo.com](mailto:cathihart@yahoo.com)

443-5117

## Yandell, Rodney

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**From:** George Moore <moorelife2k@yahoo.com>  
**Sent:** Wednesday, February 24, 2021 6:28 PM  
**To:** Yandell, Rodney  
**Subject:** Arcata Land Company Support

I'm a resident of Arcata and I want you to know that I support the responsible growth of cannabis on agricultural lands in our county. While I don't use cannabis myself, many of my patients manage anxiety, insomnia and pain with cannabis. Keep up the good work of bringing responsible growers to Humboldt County!

George J Moore, LCSW  
315-876-4419  
[Sent from Yahoo Mail for iPhone](#)

## Yandell, Rodney

---

**From:** Ford, John  
**Sent:** Thursday, February 25, 2021 6:19 AM  
**To:** Yandell, Rodney  
**Subject:** FW: next-door discussion on cannabis grow planned at sun valley bulb farm



John H. Ford  
Director  
[Planning and Building Department](#)  
707.268.3738

---

**From:** Wilson, Mike <Mike.Wilson@co.humboldt.ca.us>  
**Sent:** Wednesday, February 24, 2021 1:20 PM  
**To:** Ford, John <JFord@co.humboldt.ca.us>  
**Subject:** Fwd: next-door discussion on cannabis grow planned at sun valley bulb farm

FYI  
M

Mike Wilson P.E.  
Humboldt County Supervisor, District 3  
707.476.2393

Sent from my iPad

Begin forwarded message:

**From:** "john damon p.e." <[johndamonpe@suddenlink.net](mailto:johndamonpe@suddenlink.net)>  
**Date:** February 24, 2021 at 11:37:06 AM PST  
**To:** jean <[seasideroses@suddenlink.net](mailto:seasideroses@suddenlink.net)>, "Madrone, Steve" <[smadrone@co.humboldt.ca.us](mailto:smadrone@co.humboldt.ca.us)>, "Bohn, Rex" <[RBohn@co.humboldt.ca.us](mailto:RBohn@co.humboldt.ca.us)>, "Bushnell, Michelle" <[mbushnell@co.humboldt.ca.us](mailto:mbushnell@co.humboldt.ca.us)>, "Wilson, Mike" <[Mike.Wilson@co.humboldt.ca.us](mailto:Mike.Wilson@co.humboldt.ca.us)>, "Bass, Virginia" <[VBass@co.humboldt.ca.us](mailto:VBass@co.humboldt.ca.us)>  
**Subject:** Re: next-door discussion on cannabis grow planned at sun valley bulb farm

Jean, (from my engineer husband), The water issue is important. As I recall, in 2014 the state past a law making local jurisdictions responsible for maintaining the ground water and protecting the historical use by others. To date, the county has been sadly lacking in compliance. I recommend anyone with a well in the area start monitoring your well level and studies be implemented to determine the impact of the Sun Valley project relative to water usage and other problematic issues. All project progress should be

halted until these questions are resolved unless it becomes an issue for the Pacific Legal Foundation and resolved in court. JDPE

On 2/23/2021 4:43 PM, jean wrote:

Lee Torrence

9th Largest cannabis grow. Hello, I'm very concerned about HUGE cannabis grow that is proposed for the Arcata Bottoms. Only a few of us on 27th Street received a letter from the Planning and Building Department.

The Arcata Land Company's (Sun Valley Bulb Farm) proposed grow will be 22.9 acres. Located between Foster and 27th Street next to the old Simpson Lumber buildings. 193 hoop green houses. = 1 million square feet of grow.

My concerns are:

SKUNK ODOR

LIGHT POLLUTION: Will be 25% artificial lighting

INCREASED TRAFFIC at Alliance and Foster. 232 new trips per day.

INCREASE IN CRIME?

Please take into account that there are 3 other proposed grows within 1 mile radius from the Arcata Land Company's.

Please make your concerns heard by Friday, Feb. 26th.

Watch for Humboldt County Planning Commission's future public hearing on this. (Zoom)

Comments can be sent to Rodney Yandell, Senior Planner at [ryandell@co.humboldt.ca.us](mailto:ryandell@co.humboldt.ca.us)

707-445-7541

or mailed to:

Humboldt County Planning and Building Department

3015 H Street

Eureka, CA 95501

Call Supervisor Mike Wilson 707-825-2300 to request an extension of comment time because so many of us have not been made aware of these critical changes to our neighborhood..

Posted in General to Anyone

Comment19 Comments

Share

Lee Torrence

Lee Torrence

- Alliance - Spear

I'd be glad to post my letter to anybody who'd be interested in more detail?

4 hr ago

Lee Torrence

Lee Torrence

- Alliance - Spear

I posted this to keep it n the conversation. Kim Puckett posted details about this 3 days ago.

4 hr ago

Dwight Winegar

Dwight Winegar

- Alliance - Spear

Knowing the location mentioned, isn't this supposed to be a huge, but INDOOR grow? I thought when I first heard about this, they were referring to the large old hanger building that the mills used for locomotive repairs which became acquired by Sun Valley.

3 hr ago

Lee Torrence

Lee Torrence

- Alliance - Spear

Nope! Please read Kim Puckett's post a few days ago. It's more informative.

3 hr ago

Kim Puckett

Kim Puckett

- Alliance - Spear

That is under a separate permit and is to be used for manufacturing, processing, etc. Apparently, that CUP has already been approved. The grows will be in hoop houses, 22.9 acres (1.014 million square feet). Concerns I have (in addition to what Lee has said) include water-this will use a huge amount of water, likely far more than they purport in the study according to a very knowledgeable source who contacted me privately, affect on wildlife, etc. I also am very concerned about how this will impact those growing much smaller amounts and trying to do it legally and ethically-they will likely be put out of business. As Lee mentioned, according to a source listing the top 20 cannabis grows (legal) in the US and Canada as of October 2020, the size of this grow would place it at number 9 on that list [https://www.greenhousegrower.com/crops/cannabis/cannabis-top-20-north-americas-largest-commercial-grows/\(edited\)](https://www.greenhousegrower.com/crops/cannabis/cannabis-top-20-north-americas-largest-commercial-grows/(edited))

1h

jean damon

Add a reply...

Andrew Obrien

Andrew Obrien

- Bayside

This is a business. These aren't gangsters selling dope out of a car in a parking lot. This is a legal business. I believe your concerns about the environment and increased traffic are legitimate. But increased crime I just don't see any evidence for. I saw this as a possible opportunity for employment (since I'm a pandemic related unemployed person) and I want nothing more than legal marijuana businesses and their neighbors to coexist peacefully.

2 hr ago

Kim Puckett

Kim Puckett

- Alliance - Spear

A lot of small growers will likely be put out of business by this mega-grow. I've had a number of them contact me privately expressing their concerns.

1 hr ago

Andrew Obrien

Andrew Obrien

- Bayside

Kim Puckett What can I say? Join the fight for change. That's the country we live in. Sorry.

1 hr ago

Dwight Winegar

Dwight Winegar

- Alliance - Spear

The part about crime I agree with Andrew. While there is theft of agriculture, Sun Valley is pretty secure. However from an agricultural point of view this also raises questions about the source of water and demand upon the aquifer. Where the substantial increase in traffic is to be coming from is another interesting question. It raises enough questions for more fact gathering and review.

1 hr ago

Kim Puckett

Kim Puckett

- Alliance - Spear

Dwight Winegar, I agree about the water use and demand on the aquifer. There should be a complete EIR before this goes any further. I strongly encourage you to express your concerns to the county planner, even if it's only a few lines. Comments are due this Friday!

43 min ago

jean damon

Add a reply...

Dwight Winegar

Dwight Winegar

- Alliance - Spear



That phone number provided above for contacting Mike Wilson's office is incorrect. I thought an 825 "Arcata" number did not sound right. The number provided goes to Bureau of Land Management.

2 hr ago

Gary Bloomfield

Gary Bloomfield

- Downtown Arcata

A Thirty acre greenhouse operation on prime agricultural land certainly should have an EIR done.

2 hr ago

Kim Puckett

Kim Puckett

- Alliance - Spear

Agreed. We'd love to find someone with a professional title who can address this mitigated negative declaration and provide support for an EIR based on their professional expertise. If you know of anyone, please contact me ASAP (private message) as comments must be in by Friday. Hope this makes sense.

1 hr ago

Debbie Coles

Debbie Coles

- Sunny Brae

How are they going to get their water? I heard there were no water pipes or service to that area? What about sewer?

1 hr ago

Dwight Winegar

Dwight Winegar

- Alliance - Spear

As I just put in another reply ... essentially since this Agricultural water, one would assume that while there is plenty of water available from the Water District, being on the bottoms land you would try and resort to wells and the underground aquifer first -

but than that raises a question about sharing with other agriculture in the area and how much water is available underground for that location.

1 hr ago

Daniel Edrich

Daniel Edrich

- Manila

Water served by Manila CSD.

55 min ago

Kim Puckett

Kim Puckett

- Alliance - Spear

No, the water will come from wells on site according to the 1,400 page study document. This is a huge concern. This will use an enormous amount of water, likely far more than they have stated (according to a source that contacted me privately).(edited)

47m

Dwight Winegar

Dwight Winegar

- Alliance - Spear

Daniel Edrich Is this documented fact or a guess? This location is quite a ways over from Manila and borders the Arcata City Limits.

40 min ago

Kim Puckett

Kim Puckett

- Alliance - Spear

Dwight Winegar , it is NOT from Manila. The study states that water will come from wells that are on site.(edited)



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## Yandell, Rodney

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**From:** Katie Haenni <anticocanecorso@gmail.com>  
**Sent:** Thursday, February 25, 2021 6:44 AM  
**To:** Yandell, Rodney  
**Subject:** Sun valley mega grow in my neighborhood

Greetings,

My family lives on Spear Ave. we neighbor SVFF. I have always been concerned about the quality of our well water being so close to a mega ag site that uses commercial and conventional, as well as dangerous toxin levels in close proximity to my home, especially given that we are a home w an autistic child.

I demand a full environmental review of a grow of this scale. I demand to be notified and have a say in whether my neighborhood becomes a reckless scene of blatant environmental concerns from my family's only water supply to the loss of wildlife and migratory birds that have their migratory path right along the lines of this property.

Please feel free to reach out as you see fit 530-215-5012. I am astounded that my beloved community would allow this multinational corporation to move forward and support such on a scale to this degree. I beg you to initiate a full EIR!

Your arcata neighbors,  
The Haenni family  
K. Haenni

## Yandell, Rodney

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**From:** KC M <2011kcm@gmail.com>  
**Sent:** Thursday, February 25, 2021 9:43 AM  
**To:** Yandell, Rodney  
**Subject:** Protest to Sunvalley bulb farm request for cannabis grow

Our neighborhood lies directly behind Sun Valley Bulb farm in Arcata. I was dumbfounded to learn of the proposal to turn the entire 23 acres into a Marijuana farm. Upon speaking to several of my neighbors, no one in my neighborhood has been notified so far that I have spoken with including school workers at Pacific Union Elementary school. Instead of notification through the county we heard through a Lost Coast Outpost article 2 days before the deadline for objection. The proposal of a marijuana farm on any scale is an absolutely absurd consideration by any standards. The county would be allowing one of the largest legal marijuana grows within a mile of an elementary school, in addition to the directly impacted adjacent family neighborhoods. This will bring armed guards and inevitable increased criminal activity directly into our families' lives. With school violence and shootings being at an ever high rate, it is inconceivable that the county would set forth considerations that will potentially endanger our children's well-being and lives. Furthermore, surrounding property values will be dramatically damaged due to the "grow", the armed guards, increased criminal activity, and smell because effective mitigation is not possible on a production that large.

Kathryn C Melia  
(707)845-8201

Sent from my iPhone

## Yandell, Rodney

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**From:** Nancy <arcata51@suddenlink.net>  
**Sent:** Thursday, February 25, 2021 10:13 AM  
**To:** Yandell, Rodney  
**Subject:** Arcata Land Company Cannabis Cultivation Project and Sun Valley project- Public Comment

Rodney Yandell, Senior Planner for Humboldt County Planning Commission:

Dear Mr. Yandell,

We would like register our strong opposition to the large scale Cannabis operation proposed by Sun Valley farm and Arcata Land Company expected to come to fruition within the next year behind our Arcata home. I was informed by a neighbor of the plan only two days ago. The deadline date for public comment is tomorrow. I hope you will strive to seek as much public comment as possible from the stakeholders to protect our interests.

We have lived in our home for 30 years. What was once an elderly neighborhood whose children had grown and moved away, is now once again a young and vibrant one. Many young families have bought homes here. We have the Deep Seeded Farm, behind us that provides fresh, organic vegetables. How will this large growing operation impact our homes and the Deep-Seeded farm that is such a valuable resource for the community?

I've seen comments that the proposed Cannabis farm will be the 9th largest in the United States. Do we really want to support such a large operation with a huge carbon footprint in Arcata? We chose to live here because of the rural environment.

We have a small vegetable garden. Can you assure me that the vegetables in my garden and the vegetables from our farm share will be safe from the pesticides and toxins used by this farm? Or the dust stirred by the planting and harvesting will not cause illness? My 15 year old daughter has asthma. Might we have to move from our home of 30 years because of this proposal? Will the proposed mitigation measures truly protect her health? And that of the children and families who live here?

Can you assure us that our property values will not decline? Our family home is our main investment in retirement. If we were to buy a home now, we would not choose to live close to one of the largest cannabis farms in the United States.

Will the sound of generators used to power the greenhouses or equipment be an issue for the surrounding peaceful neighborhood? Or the lights of the greenhouses?

Will the odor of cannabis now permeate our neighborhood? Can you assure us that the odor mitigation efforts will be effective? How will you monitor this? Many of us are either asthmatic or sensitive to the odor of cannabis. We are counting on you to protect our health, our property values and our interests as a our trusted planning department. Thank you for your time.

Sincerely,  
Nancy and Warren Blinn

Sent from my iPad

## Yandell, Rodney

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**From:** Trinity Herbal Co <trinherbco@gmail.com>  
**Sent:** Wednesday, February 24, 2021 12:00 PM  
**To:** Yandell, Rodney  
**Subject:** regarding: Arcata Land Company/Sun Valley Floral Farms project

Hi Rodney,

This is a terrible project that defeats the spirit of MCAURSA and Prop 64. Mostly because of it's size and impact on the entire cannabis industry in Humboldt. This one project will crowd out **100's of traditional mom and pop cultivations**. By approving this project you are destroying the future of 100's of other small businesses. Humboldt and the Emerald Triangle deserve better than huge money grows. This is inviting in exactly what we have all tried to prevent= Big money grows. The mom and pops are struggling already to stay in the market. This will crush them. Just like Walmart crushed the small stores, this will crush the small farmers. Please do not approve this project.

Sincerely,  
Natasha Hays

## Yandell, Rodney

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**From:** Morgan P King <Morgan.King@humboldt.edu>  
**Sent:** Thursday, February 25, 2021 8:59 AM  
**To:** Yandell, Rodney  
**Subject:** Comment on Sun Valley cannabis project

Based on the project proposal, Scopes 1 and 2 greenhouse gas emissions associated with this project will be quite significant (Scope 1 = onsite combustion of natural gas, Scope 2 = electricity). Where is Humboldt County with its Climate Action Plan and is that plan part of the review for this project? If not, why not?!

This project will have a negative impact on the County's climate goals (and State goals) in curtailing emissions and averting the worst of the climate crisis, which impacts our most vulnerable communities, including in Humboldt County. The electrical grid is much cleaner than natural gas, and based on State goals the grid will be carbon free by 2045. We must transition away from natural gas, electrify operations, and power those operations with decarbonized sources.

I also have concerns about light pollution and the impacts of this proposed project on endemic species and flyover species and urge more investigation be done on these impacts.

Thank you,

## Yandell, Rodney

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**From:** William Padilla <WPadilla@tsvg.com>  
**Sent:** Thursday, February 25, 2021 11:11 AM  
**To:** Yandell, Rodney  
**Subject:** Sunnyvale

With some of the negative comments I'm seeing I think .community members need to hear comments from people sunvalley has had positive effects on .8 years ago sunvalley gave me a chance when no one else would. Sunvalley has helped me become a productive member of this community as before I was not. I'm not alone in this I know of many teammates here who have similar stories.

Sent via the Samsung Galaxy A10e, an AT&T 4G LTE smartphone



## Yandell, Rodney

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**From:** Genevieve Serna <marquez\_genevieve@yahoo.com>  
**Sent:** Thursday, February 25, 2021 11:18 AM  
**To:** Yandell, Rodney  
**Subject:** Public Comment Regarding Sun Valley Cannabis Expansion

Good Afternoon Rodney,

My name is Genevieve and I'm a resident of Arcata whose home is near the intersection of Alliance and Spear Ave. I just wanted to submit a comment on this upcoming item for the Planning Commission to express my opposition to the 23 acre expansion for commercial cannabis cultivation to the current Sun Valley Floral Farm. My concerns likely matches those of other nearby residence over this product and how it might negatively impact our home values and everyday lives including potential odors from the facility, its proximity to Pacific Union School and Mad River Hospital as well as the environmental effects paving over 23 acres of farmland will cause to nearby residences in a location that is already prone to flooding. While I understand the sentiment of wanting to expand the local economy and provide residents with work, I do not believe that such goals should come at the expense of the interests of Arcata residents.

Thank you for your time,  
Genevieve S.  
Resident of Arcata

## Yandell, Rodney

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**From:** Ron Yeager <yeager\_ron@hotmail.com>  
**Sent:** Thursday, February 25, 2021 11:52 AM  
**To:** Yandell, Rodney  
**Subject:** Against SunValley grow .

I live directly behind the grow. The impact this operation will have on our neighbors and myself would be catastrophic. I can't say enough about stopping this greedy use of land use. The bulb farm has enough impact on our neighborhood as it is. Chemical sprays and the Oder of their fertilizers drift into our homes all the time. We tolerated it because its flowers. Not so with the stink of the pot, the criminal element that would invade our homes and streets, and the chemicals leaching into our groundwater. Please stop this project or move it further from people's homes. There is no reason it has to close to our homes. Ron Yeager Jessica Ct Arcata

Sent from [Outlook](#)

## Yandell, Rodney

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**From:** Tzelles <tzelles@sonic.net>  
**Sent:** Thursday, February 25, 2021 1:20 PM  
**To:** Yandell, Rodney  
**Cc:** admin@samararestoration.com; tilebybavin@sonic.net  
**Subject:** Sun Valley Cannabis grow, Arcata

I would like to express my concern of the possibility of Sun Valley Floral Farms creating a 23 acre marijuana grow near my home on Wyatt Ln.

I have lived on Wyatt Ln with my husband for almost 26 years. It is a quiet neighborhood with Deep Seeded CSA behind our backyard.

We are deeply concerned of the possibility of the noise, light and air pollution a 23 acre site would create. I love my back yard garden and spend many days enjoying it with friends and my children. I like to smell the variety of flowers and scents my garden offers and spend time tending my vegetables. To think that the only smell for the rest of my days will be of marijuana flower is deeply concerning to me and my neighbors. There is little you can do to avoid the smell of a 23 acre flowering marijuana farm, with all the filtration systems in place I am certain we will always smell cannabis.

How many lights and fans will it take to sustain the size of this operation? Those fans will undoubtedly make a loud constant drone of noise 24/7. It is almost dead quiet here in the evening, we are certain the quiet will be impacted by the fan/filtration system noise. Not to mention how many lights it will take to sustain a grow of this magnitude, how will you manage that so as not to impede our view of the stars?

I am not anti-marijuana, it has many great uses and benefits. I also believe this will create jobs which we need. However, I am greatly upset to think my quality of life I've cherished and valued through all my years living in this one neighborhood will drastically be altered. The value of my home possibly going down because of it. There are schools and a church nearby, how will this impact them? Could Sun Valley restructure their site to accommodate such a thing but further into the bottoms and further away from our homes, schools and church, the burden should be on them who will be making money from this, not on us as we have nothing to benefit from it.

I was suspicious on Valentines day when Sun Valley left bouquets of flowers on our porches just to be "friendly neighbors" which they've never done in all the years I've lived here. My immediate thought was "I wonder what they're up to?" And here we are, only alerted by other concerned neighbors and not by them or the county--why was this not brought to our attention? This will impact the entire Westwood neighborhood and we all should have gotten the letter that only a very few people received.

Please consider the impacts this will actually have on the entire town of Arcata. This is a unique, University town, with sweet, small local businesses, various farms and forest settings that make a wholesome little village. There must be a better location for something of this scale.

Deeply concerned,  
Traci Zelles  
Resident on Wyatt Ln, Arcata

## Yandell, Rodney

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**From:** Margaret J Lawson <Margaret.Lawson@humboldt.edu>  
**Sent:** Thursday, February 25, 2021 3:12 PM  
**To:** Yandell, Rodney  
**Subject:** Sun Valley Cannabis production

Dear Sir,

I have just learned of the Sun Valley expansion into cannabis production. I live at 3784 Spear avenue in Arcata. I oppose this ludicrous proposal in the small, family centered area of Arcata. We have enough issues without allowing this to proceed. There is no amount of assurance that will alleviate my concern.

Margaret Lawson  
707 834-9942

**From:** Sean Knight <sean.knight@theyakgroup.com>  
**Sent:** Thursday, February 25, 2021 3:21 PM  
**To:** Yandell, Rodney  
**Subject:** sun valley comment

Duuuuuuuuuuuuuuuuuuuuuuuuuuuuuuuuuuuuuuude!

Dear Mr. Rodney Yandell .. i like weed! but this is nuts! 20+ acres!!!

BAD FOR HUMBOLDTS BRAND NAME - CRAP CANNABIS just for extraction that's all they can really produce. We don't even know if the feds allow extraction what happens if that's the way it plays out on the federal level.

HOW MANY FANS ARE THEY GOING TO NEED TO RUN? THAT'S SOME NOISE all those fans.

I LIVE ON STROMBERG I CAN HEAR THE OCEAN TO FALL ASLEEP NOW IT'S GOING TO BE FANS. Please don't let this HAPPEN!.

This is not going to create more jobs right now dark staffing says they can't find enough people.

this is truly a pipe dream and real waste of your time.

## Sean Knight

Creative Sherpa

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Humboldt County, California USA

**VIEW MY CALENDAR LET'S CHAT!**

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## Yandell, Rodney

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**From:** Santos, Steven A on behalf of Cannabis Services Division  
**Sent:** Thursday, February 25, 2021 12:38 PM  
**To:** Yandell, Rodney  
**Subject:** FW: Arcata Land Company grow

**From:** PlanningBuilding <planningbuilding@co.humboldt.ca.us>  
**Sent:** Thursday, February 25, 2021 8:19 AM  
**To:** Cannabis Services Division <cannabis@co.humboldt.ca.us>  
**Subject:** FW: Arcata Land Company grow



Ashley Wilson  
Office Assistant I  
Planning and Building Department  
3015 H Street | Eureka, CA 95501  
Phone: (707) 267-9146 | Fax: 707-445-7446  
Email: [awilson@co.humboldt.ca.us](mailto:awilson@co.humboldt.ca.us)

**From:** Joan Edwards <[johoda63@gmail.com](mailto:johoda63@gmail.com)>  
**Sent:** Wednesday, February 24, 2021 2:40 PM  
**To:** PlanningBuilding <[planningbuilding@co.humboldt.ca.us](mailto:planningbuilding@co.humboldt.ca.us)>  
**Subject:** Arcata Land Company grow

I have a lot of concerns about the proposed cannabis grow between 27th St and Foster in Arcata. I urge you to consider pushing the project further away from neighborhoods and to require that the use of water be limited to purchase from Humboldt Bay rather than using up all the water in the aquifer for this money making project at the expense of every other homeowner in the area. These are the two areas that concern me the most. Those and an increase in localized crime but that might be reduced the further out it is. Please slow the process down and obtain the appropriate environmental impact studies before moving forward with this. the NINTH largest marijuana grow in the United states and Canada.

Sincerely, Joan Edwards

## **Yandell, Rodney**

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**From:** Wille Hansen <william.g.hansen@gmail.com>  
**Sent:** Thursday, February 25, 2021 4:44 PM  
**To:** Yandell, Rodney  
**Subject:** Upper bay road resident in favor of sun valley weed farm

I have lived at 1975 upper bay road since 2014. I don't see how weed is any different than any other type of ag and I believe should be allowed. It should be allowed to operate and bring money to the county.

## Yandell, Rodney

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**From:** Erik Garcia <eriklgarcia@outlook.com>  
**Sent:** Thursday, February 25, 2021 5:01 PM  
**To:** Yandell, Rodney  
**Subject:** Opposition to Sun Valley Cannabis Expansion

Hello there,

My name is Erik Garcia, and I own two homes on Stromberg Avenue in Arcata. I'm writing to express my great concern about Sun Valley's request to expand their operations into the cannabis industry right in our back yard.

I do not think that this should be permitted, and I especially do not think that this has been thought all the way through.

Some of the concerns (among others) that I have are:

- Drop in my property value. Who is going to want to buy a residential home in a neighborhood that is right by a large-scale cannabis operation?
  - We're used to being surrounded by small farms, but this would completely change the character of the entire neighborhood. There will most certainly be increased traffic on roads that are barely able to sustain the traffic they have now judging by the frequent potholes.
- The potential for increased crime. This is not an industry that's "typical" farming, and the fact that there are going to be armed guards and armed transportation should say everything about the crime potential that is to be expected. This is very close to a residential neighborhood where I see kids walking around all the time. Do we really think that an operation of this magnitude in this RESIDENTIAL neighborhood / area is a good idea?
- We have nothing to prove that Sun Valley's claims of mitigating the smell from their operation will actually prove to be effective. I especially think of a day like today in Humboldt that is particularly windy.
- There's also a high likelihood of more poisons and pesticides in our groundwater.

Please reconsider approving this project.

Thank you,  
Erik Garcia

Sent from [Outlook](#)



## Yandell, Rodney

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**From:** Lois Roper <mlroper2@gmail.com>  
**Sent:** Thursday, February 25, 2021 5:02 PM  
**To:** Yandell, Rodney  
**Subject:** Cannabis farm at Sun Valley

I am a resident of the west end of Stewart Ave., Arcata, the cannabis farm will be just west of the end of Stewart Ave., across the field. This is too close the Westwood subdivision, as well as the new Janes Creek housing, 151 units, as well as a proposed Senior Care Home. The cannabis odor is not pleasant in small amounts let alone in an industrial scale farm output. I have lived here since 1961, yes that is 60 years, there has been lots of changes over the years but this is the worst! The additional traffic on 27<sup>th</sup> St. would cause congestion at the intersection with Alliance Rd. If Upper Bay Rd. is used than the intersection with Janes Rd, will be an issue with the Pacific Union School traffic and children walking to school.

Please keep the neighborhood as a place for families not cannabis!

Lois Roper  
1730 Stewart Ave.  
Arcata, Ca. 95521

Sent from Mail for Windows 10



To: Rodney Yandell [ryandell@co.humboldt.ca.gov](mailto:ryandell@co.humboldt.ca.gov)  
From: James Cotton, Kim Puckett, Andy Bunnell, and Anita Bunnell  
Date: 26 February 2021

Humboldt County Planning Department / 3015 H Street / Eureka CA 95501

Re: ARCATA LAND COMPANY, LLC COMMERCIAL CANNABIS OUTDOOR LIGHT-DEPRIVATION AND MIXED-LIGHT CULTIVATION PROJECT APPLICATION NO. 12255

First, we did not receive notification from the county regarding this project. We live about 800 feet to the east of the project as do our next-door neighbors on both sides. We understand the county is not obligated, under existing policy, to notify residents/owners if they live more than 300 feet from a project. Under this policy, only one residence, AP 507-181-017, would have received notification and curiously, a small number of residents that live over 1,000 feet away from the project did receive notification. This is how we found out about the project as one of those receiving notification was upset about the project and wanted to know how we felt about it. Imagine our shock and dismay at finding out about this in this way less than two weeks before the comment period ended, particularly given the CEQA document is over 1,400 pages long. Considering that this would be the ninth largest industrial grow in the United States and Canada according to data from October 2020 (<https://www.greenhousegrower.com/crops/cannabis/cannabis-top-20-north-americas-largest-commercial-grows>), why would the county not notify the entire surrounding community about a project of this magnitude and neighborhood/community impact?

Second, we dispute the designation of less than Significant with Mitigation for this proposed project based on the reasons detailed in the comments below. Why was this project designated as less than significant with mitigation when there are so many significant impacts? Additionally, there are numerous irregularities and false statements in the INITIAL STUDY AND DRAFT MITIGATED NEGATIVE DECLARATION.

## AESTHETICS

- Page 27 of the INITIAL STUDY AND DRAFT MITIGATED NEGATIVE DECLARATION (ISDMND) discusses the proposed structures and states they are “obscured from view from offsite residences and motorists on both Foster Avenue and 27th Street due to significant existing perimeter vegetation on adjoining parcels.” This is a false statement. There is no existing vegetation along the entire eastern boundary of the parcel and there is a significant visual impact for the neighboring parcels. Why was this not disclosed in the ISDMND? The glare from the proposed 1,014,000 million square feet of plastic hoop houses will be significant and unavoidable. On sunny days the hoop house will reflect the sunlight like a mirror. This will cause an undue visual hardship on the parcels to the east of the project: imagine a 1,014,00 square foot mirror. How does CEQA mitigate for the visual impact and glare along the Eastern boundary of the parcel?
- New lighting at the site is a concern. We have asked the Arcata Land Company to shield their existing security lights that shine into our bedrooms and our living room. To date, Arcata Land Company/Sun Valley Group has not responded to our request. Other neighbors and

Page 1 of 6

community members have complained about the lights from the existing greenhouses. The ISDMND failed to discuss any enforcement actions. How can we be assured that they will be responsive to complaints in the future? What are the enforcement actions if they fail to respond?

- Why is a viewshed analysis missing from the document? When will this be done?

## AGRICULTURE AND FORESTRY RESOURCES

- Page 30 of the ISDMND states that the project: “would not indirectly convert farmland to non-agricultural land or forest land to non-forest land.” This is in direct contradiction to the page 8 ISDMND statement: “In addition to the placement of sand/soil, Site development will include approximately 40,500 square feet of new concrete surfacing, comprised of concrete within the loading zones, walkways around the administration buildings, ADA parking stalls and ramps (12,698 square feet), green waste storage area (9,460 square feet), and walkways between hoops (18,342 square feet).” This is a total of 74,040 SF of concrete (1.7 acres). This is a net loss of agriculture land and definitely has an impact as does the addition of sand to the soil which destroys the tilth (<http://counties.agrilife.org/williamson/files/2014/08/managing-soil-tilth.pdf>) Why is this being allowed? What is the environmental impact of covering 23 acres of agriculture to hoop houses?

## AIR QUALITY

- Due to the strong winds in the Arcata Bottoms (project site), dust plumes are created when the ground is disturbed and the particles are transported downwind. Mitigation must include disturbing soil only during low wind conditions. How can we be assured of this?
- On Page 33 the ISDMND states “With the exception of scattered rural residential, there are no sensitive land uses within the vicinity. The surrounding vicinity is sparsely populated with approximately five residences located within 1,000 feet of the Project Site.” This is false. There are eight residence less than 1,000 feet from Project Site including, at least two of which have residents with severe asthma. It further states: “Mary’s Catholic Church is located >2,000 feet to the southeast” when in fact, it is 1,687 feet. It also states “The City of Arcata School District owns property located a minimum of 600 feet to the east” when it is 564 feet. This school property is currently a Community Supported Agriculture Farm that sells vegetables to our community that are grown using organic techniques. Adjacent to the school district property is a city owned 4 + acre parcel (AP 505-151-009) that is proposed to become a city park. The western boundary to a large residential subdivision is located 1,400 feet to the east of the proposed cannabis project. To the north, there is another large residential neighborhood 2,620 feet away. To the southeast is a large residential neighborhood 2,601 feet away. NOTE: All measurements used above are calculated with the measuring tool on the Humboldt County GIS Web Portal. All properties discussed are downwind of the proposed project and will be affected by odor drift.
- Other sensitive receptors identified in the ISDMND are the planned senior care center and senior housing located on the recently Foster Annex parcel (505 061 011) along with schools and child care centers.

## ODORS

- Page 33 states: “During operation, the cultivation of cannabis is a potential source of odors. The odor of cannabis is described by some as an offensive skunk-like smell. This odor is

produced by terpenes, which are volatile, unsaturated hydrocarbons found in the oils of various plants. Naturally, these oils are most present late in the budding cycle and at harvest. Without proper controls, greenhouse (hoop structure) cultivation can lead to a buildup of these odors because of reduced ventilation, heat and humidity conditions. The closest offsite residences are two homes located on a single parcel off of 27th Street approximately 200 feet to the north and northeast of the Site. Beyond this single parcel, the next closest homes are located >500 feet to the east of the Project Site. Given the limited number of potential receptors, separation distance, and control measures to be implemented through the Conditional Use Permit, the Project is not anticipated to create objectionable odors affecting a substantial number of people and impacts would be less than significant.” The conclusions drawn at the end of this statement are erroneous. There are eight parcels less than 1,000 feet away from the project site and a residential subdivision 1,400 feet from the project site. Many of the owners of these parcels and residences have spent decades developing their homes and properties and take offense at the county’s seeming willingness to sacrifice them for the financial gain of very few. It is our assumption that the hoop houses will have the doors at one end that will be open during the period when the fans are operating and the filtration system is in use. Is this assumption correct? If so, this would allow non-filtered odors to escape, meaning a considerable volume of air containing odors will be transported downwind and affect all the people living downwind. If this is correct, how will this be mitigated?

- Given that the wind at the project site exceeds 10 miles per hours most days (NWS data), the Volatile Organic Compounds (VOCs) venting and escaping from the hoop houses will be transported downwind. These VOC’s are dangerous especially to people that have respiratory illnesses (including at least two people with severe asthma living within 800 feet). <https://www.tandfonline.com/doi/full/10.1080/10962247.2019.1654038> It is doubtful that odors from this enormous grow (23 acres, 1,014,000 sq. ft.) will be adequately mitigated. The mitigation measures in the ISDMND failed to define how the county will quantify the smell when odor complaints are filed. How will the county quantify the odors? What will be the threshold for the number of complaints before the county takes action and what will those actions be? Note: There is a device (the Nasal Ranger) that can quantify the concentration of odors but our county does not have one. Because of the size and unknowns of this cultivation this project needs an EIR. Why has an EIR not been conducted?

## NOISE

- We are very concerned that the project states that noise is a “less than significant impact” given the number of fans that will be in use to ventilate the greenhouses. Winds in the Arcata Bottom transport sound a long distance. For example, we have had to call Sun Valley on numerous occasions to have them turn down the radios that workers are listening to in the fields. How will the noise of the fans be mitigated?

## BIOLOGICAL RESOURCES

- None of the bird species for which foraging habitat exists within the project were detected on the first survey (conducted on May 2, 2019). These potential species are: Cooper's hawk (*Accipiter cooperii*), Sharp-shinned hawk (*Accipiter striatus*), Great egret (*Ardea alba*), Great blue heron (*Ardea herodias*), Short-eared owl (*Asio flammeus*), Vaux's swift (*Chaetura vauxi*), Northern harrier (*Circus cyaneus*), Snowy egret (*Egretta thula*), White-tailed



kite (*Elanus leucurus*), Merlin (*Falco columbarius*), American Peregrine falcon (*Falco peregrinus anatum*) and Bryant's Savannah sparrow (*Passerculus sandwichensis alaudinus*).

- Birds species seen on the second survey (conducted on July 19, 2019) were: Common raven (*Corvus corax*), Northern harrier (*Circus cyaneus*), Cedar waxwing (*Bombycilla cedrorum*), Barn swallow (*Hirundo rustica*) and Brown-headed cowbird (*Molothrus ater*).
- Missing from the above lists are Crackling Goose (*Branta hutchinsii*) and Canadian Goose (*Branta canadensis*) which are common during the migration months of January thru April where up to 60,000 can be seen in the Humboldt Bay area. We have observed both of these species in large numbers foraging on the fields of the study area during the winter months. The reason these birds were not detected during the surveys is because the studies were conducted outside the migration period and the fact that the study was only conducted for a few hours on one day in May and a second day in June. One of us, James Cotton, is a retired federal wildlife biologist and is very familiar with methodologies involved in conducting field surveys. He finds the bird study performed by SHN to be inadequate due to the small sample size and that they were conducted outside the migration period for the dominate species, in terms of numbers, that uses the site for forage. How can an evaluation for CEQA be made on inadequate and insufficient data?

## Water Source and Irrigation Plan

- One of several major flaws in the ISDMND is the absence of data regarding the number of cannabis plants that will be grown during the months of April thru October. What is the number of plants projected to be grown counting all the rotation plants?  
The 1,014,000 square feet of hoop houses will consume a significant amount of water. According to The Journal of Environmental Management, greenhouse cannabis grows use more water than outdoor cannabis cultivation uses  
<https://www.sciencedirect.com/science/article/pii/S0301479720308847?fbclid=IwAR3jZRnDZb-PxL54IX1eVZz3PAJGI4cGd4YFITAQqM5qtvP8xF5FzkkejHc> Calculating water usage without knowing the number of plants is inaccurate at best, however, using the model described by 151.org in <https://151farmers.org/wp-content/uploads/2018/07/Greenhouse-Water-Consumption-Table-.pdf?fbclid=IwAR3jZRnDZb-PxL54IX1eVZz3PAJGI4cGd4YFITAQqM5qtvP8xF5FzkkejHc> and adjusting for number of days, assuming 16 sq ft per plant, and only one harvest (no rotation) per season, the calculated water usage is a very conservative 80-acre feet per year, not 52-acre feet as stated on page 6. We emphasize that the total number of plants to be grown throughout the season must be known in order to determine accurate water usage. Why is the project not required to state the estimated number of plants? Why does CEQA not require this vital piece of information? Why does the county not require it, particularly given climate change and the drought conditions we've dealt with over the past number of years? How was the 52-acre feet of water number estimated without knowing the number of plants to be grown?
- The report does not mention if the wells are dedicated to the hoop houses exclusively or if the water will also be used for other purposes. How will well water consumption be monitored, measured, documented, and reported?

- Will the wells be monitored for toxic chemicals on a regular basis? Who does the monitoring? Where and how will the results be reported and will they be available for the community to see?
- How will the amount of water needed for this project impact neighborhood wells? This is a concern of many in the neighborhood that rely on wells for their water needs. How will this be monitored and mitigated?
- Other topics that were missing in the study are saltwater intrusion and the cumulative impact of other wells in the Arcata Bottom pumping from the aquifer(s). This is a significant omission. Saltwater intrusions have a serious impact on agricultural lands and can cause ecosystems changes that displace plant species. "Seawater intrusion is the movement of seawater into fresh water aquifers due to natural processes or human activities. Seawater intrusion is caused by decreases in groundwater levels or by rises in seawater levels. When you pump out fresh water rapidly, you lower the height of the freshwater in the aquifer forming a cone of depression. The salt water rises 40 feet for every 1 foot of freshwater depression and forms a cone of ascension. Intrusion can affect the quality of water not only at the pumping well sites, but also at other well sites, and undeveloped portions of the aquifer." (<https://www.lenntech.com/groundwater/seawater-intrusions.htm#ixzz6nQIVoThg>) . Sea levels will continue to rise as a result of climate change and will exacerbate saltwater intrusions in coastal areas and impact agriculture lands. During the rapid pumping of wells while performing the cleanup of the toxic chemical pentachlorophenol at the old Simpson Mill (adjacent parcel to the project site) a saltwater intrusion was observed, meaning a mixture of saltwater was pumped to the surface. This layer of saltwater below the fresh water was present at the time of the clean-up and most likely is still present today. If rapid depletion/pumping from the existing aquifer happens again, then mostly likely another saltwater intrusion would occur. Additional studies need to be conducted to determine if the surrounding wells are pumping from the same aquifer/s as that of the wells supplying water to the proposed project site and if so, at what rate, so rapid water drawdown can be avoided. Will these studies be conducted? If so, when? If not, why not?

#### Sources:

- [https://humboldt看.org/sites/humboldt看.org/files/Final\\_HBSLR\\_ConceptualGroundwaterModel\\_141209.pdf](https://humboldt看.org/sites/humboldt看.org/files/Final_HBSLR_ConceptualGroundwaterModel_141209.pdf)
- <https://deeply.thenewhumanitarian.org/water/community/2018/05/14/seawater-intrusion-threatens-some-of-californias-richest-farmland>
- <https://www.humboldt看keeper.org/climate-change-impacts-sea-level-rise/69-in-the-news/672-rising-seas-pose-risks-around-humboldt-bay>
- <https://www.climatehubs.usda.gov/taxonomy/term/391>
- <https://www.cityofarcata.org/DocumentCenter/View/7193/City-of-Arcata-Sea-Level-Rise-Risk-Assessment-04-2018?bidId=>

#### TRAFFIC

- Page 1250 of the study states, "Based on standard ITE rates, the project would be expected to result in 232 new trips per day at peak operation." Foster Avenue will require extensive upgrades, especially the first two corners that are encountered when traveling westward from Alliance Road. These corners, in their present condition, will not allow two semi-trucks, traveling in opposite directions, to negotiate the turns simultaneously. Additionally, the sightline on the second corner of Foster Ave. heading westward from Alliance Road is very

limited and, in my opinion, is a safety hazard, needs further study. Will this receive further study? If not, why not?

- Page 1282 states: "Based on standard ITE rates, the proposed project would be expected to result in 232 new trips per day at peak operation." Do we understand correctly that, including the new trips and accounting for the other existing and pending permits that will be using Foster Avenue, the number of trips on Foster Avenue will be in excess of 900 trips beyond the current normal traffic flow? If not, what are the number of trips when including the existing traffic and pending permits?
- To mitigate the number of trips on Foster Avenue, Arcata Land Company could transport workers to and from work to a transportation hub or to housing they currently own. Sun Valley Farms is currently transporting some of their worker to and from company owned houses on 27<sup>th</sup> Street and other locations using their vans, this is model could be implemented by the Arcata Land Company.

#### OTHER CONCERNS

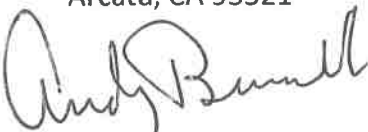
- Due to the proximity of the cannabis grow (800 feet), our property values, along with many of those in the neighborhood, will likely be significantly reduced as will the number of potential buyers. Local realtor Richard Dorn told us "living close to a Cannabis grow of this size will have a significant impact due to limiting the numbers of buyers." A Sacramento Bee article from 9/17/17 titled "If a marijuana grow warehouse opens nearby, will your home value suffer?" (link <https://amp.sacbee.com/news/business/real-estate-news/article173621656.html>) shows that property values can suffer How will the potential impact on property values not be addressed?
- The report fails to adequately address the potential for increased crime. Given the high monetary value of cannabis, this is a concern of many in the community. The study states that there will be security but what does this look like? How will this affect the neighborhood? Will there be armed guards? Guard dogs?

Sincerely,

  
James Cotton  
1971 27<sup>th</sup> St  
Arcata, CA 95521  
[jimcotton47@gmail.com](mailto:jimcotton47@gmail.com)  
26 Feb 2021

 2/26/21  
Kim Puckett  
1971 27<sup>th</sup> St  
Arcata, CA 95521  
[kimleepuckett@gmail.com](mailto:kimleepuckett@gmail.com)

Andy Bunnell  
1969 27<sup>th</sup> Street  
Arcata, CA 95521

  
2/26/2021

Anita Bunnell  
1969 27<sup>th</sup> Street  
Arcata, CA 95521

  
2/26/21

## Yandell, Rodney

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**From:** Braden Nichols <bsnichols313@gmail.com>  
**Sent:** Thursday, February 25, 2021 5:12 PM  
**To:** Yandell, Rodney; Ford, John; Russell, Robert; PlanningBuilding  
**Subject:** Sun Valley Commercial Cannabis Facility in Humboldt County, Arcata, CA

Hello,

I am reaching out to address my personal and professional concerns in regards to the proposed commercial cannabis facility to be operated by Sun Valley Co. in Arcata, CA. As a registered engineer and working within the cannabis field myself, I can see major flaws in the proposed concepts detailed in the Initial Study written for this project.

Firstly, a largely residential area on the eastern side of the proposed facility will be affected by property value decreases. The fear that a large, rather expensive commodity product like this would be drawing a lot of attention from individuals who are involved in crime/ theft into their community (myself included) has arisen from the proposal. Living less than a mile from this proposed facility I wouldn't feel comfortable with this, even with armed militants who do nothing but make the community more uneasy.

Secondly, the light attenuation put off from this sort of a facility in the hills of Humboldt County is a nuisance and has been cause for community outrage many times. This project being in line of sight for so many residences, the proposal that these facilities would not have substantial effect is outright outrageous. It is known that countless studies are needed to adjust for noise and light attenuation for any cannabis project, especially one so close to so many homes.

Last but most definitely not least is the scent/ odor that WILL be emitted from these facilities. Light deprivation greenhouses expose the crops to the open air and during the blooming/ budding period of these plants, the terpenes in the cannabis will carry odors arguably through half of Arcata or further. The initial study proposes for "exhaust fans" and "activated carbon filters" that have proven to be ineffective at mitigating this type of issue for smaller scale projects, this project is orders of magnitude larger than the other failed projects. Unless huge commercial scale air filtration or odor control systems are implemented, these Volatile Organic Compounds will cause headaches, and irritation to all members of the community especially the most sensitive communities. An elementary school and a community hospital are located within 1 mile of this proposed facility. Companies like "Ecosorb" create products to fix these types of issues, and must be considered as a **mandatory measure** for this project. This odor issue is much more harmful than the Engineer on consult tried to relay and must be addressed responsibly.

These issues must be exhausted before this project is considered feasible. Thank you for your time,

Braden Nichols - Environmental Engineer/ Consultant



## Yandell, Rodney

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**From:** Vera shumard <verashumard@att.net>  
**Sent:** Thursday, February 25, 2021 11:45 PM  
**To:** Yandell, Rodney  
**Subject:** Sun Valley Farms

I own a home near Sun Valley Farms in the Pacific Union Subdivision. I DONOT approve of a cannibus farm a quarter of a mile away. I have lived here since 1987 and my children went to school at Pacific Union and Arcata High. This is not ok. Believe it or not all of Humboldt voted Marijuana in. The smell is sickening and bad for our health to smell..bringing more crime even closer to homes and school. Put the crops where they belong " in the hills". I am very unhappy and disappointed that Sun Valley would resort to this! Our children have it hard enough making it in this word of drugs, crime and hate. Do not add to our Humboldt County's many failing decisions. I say NO to this ridiculous idea in our area..41 years here is enough reason. Buy my home for top dollar if this is what you propose..I like many cannot afford to upgrade to a gated community..

[Sent from AT&T Yahoo Mail on usAndroid](#)

## Yandell, Rodney

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**From:** kp@suddenlink.net  
**Sent:** Friday, February 26, 2021 7:42 AM  
**To:** Yandell, Rodney  
**Subject:** Marijuana farm at Sun Valley

I STRONGLY oppose this plan. It is not in the best interest of this community. Everything about it goes against what this area is about. The health of the people and the Integrity of the environment are already being compromised. Please don't help destroy what others worked hard to leave us. We are to be good stewards of the land, and this is all about the money and nothing else.

Karen Puttler

## Yandell, Rodney

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**From:** cindy shaw <cindyshaw7@gmail.com>  
**Sent:** Friday, February 26, 2021 7:59 AM  
**To:** Yandell, Rodney  
**Subject:** Fwd: Commercial Cannabis Grow

----- Forwarded message -----

**From:** cindy shaw <cindyshaw7@gmail.com>  
**Date:** Fri, Feb 26, 2021 at 7:56 AM  
**Subject:** RE: Commercial Cannabis Grow  
**To:** <[ryandell@co.humboldt.ca.gov](mailto:ryandell@co.humboldt.ca.gov)>

Mr. Yandell,

I'm a concerned neighbor here in Arcata, in beautiful Humboldt County, with the proposed cannabis grow that is being proposed. It's shocking that we all just found out about it given the huge scope of this project.

I have read Jim Cotton's thorough report with his many excellent questions up for review. It is so shocking that this could be a reality in our beautiful, rural oasis here. And it's shameful too that a company might be able to do so much damage to our community.

I live very close by, on Iverson Ave. I can see beyond the field in my backyard that abuts 17th St to where the proposed grow would be. Yes, it's so devastating to Kim Puckett and Jim Cotton and all the neighbors who are just feet from it, but it would affect the surrounding area for miles. It's shameful and I'm disgusted by what big money can do to a community.

I hope you can answer all of Jim's excellent questions because I want to hear all the answers. A full EIR is necessary!

Please acknowledge my receipt of my complaint.

Sincerely,

Cindy Shaw  
1836 Iverson Ave, Arcata  
707-296-5217

## Yandell, Rodney

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**From:** denidevine <denidevine@comcast.net>  
**Sent:** Friday, February 26, 2021 8:01 AM  
**To:** Yandell, Rodney  
**Subject:** Arcata bottoms commercial grow

To all governing parties,

I would like to voice my disapproval of the proposed Industrial Marijuana grow that is currently under consideration by the county.

We chose to live in the Arcata Bottoms because we value clean air and clean water above modern conveniences. We raise our families, animals, and grow our food off of the very dirt that the county is now considering to be deemed as expendable.

We have witnessed how fertilizers and pesticides, from large industrial grows, have changed the clear blue waters of the Trinity River into green algae blooms. We have watched the run off from these large scale grows pollute the estuaries and the Bay with toxic red algae as well.

Humboldt county has ALWAYS considered the environment as a natural resource that should not be disturbed. I would sincerely hope that tax dollars do not displace the efforts to keep our Arcata Bottoms clear of the effects of greed and over consumption.

Arcata once voted to keep ALL nuclear related businesses from doing business in our community. I would like to propose that a new ordinance be voted on to keep these large scale grows in warehouses where the city can meter/ charge for the water being used, and also monitor what is in the waste water that would be going into the dirt.

We stand firmly against ANY project that will affect what we all consider our most valued asset...preserving the beauty and wholesomeness of the Arcata Bottoms.

Please remember the human condition is what is destroying our beautiful Earth...nothing else!

Todd C. Casebolt  
4203 Foster Ave.  
Arcata, CA  
95221  
[\(209\)403-5734](tel:(209)403-5734)

Sent from my Verizon, Samsung Galaxy smartphone

## Yandell, Rodney

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**From:** kp@suddenlink.net  
**Sent:** Friday, February 26, 2021 8:10 AM  
**To:** Yandell, Rodney  
**Subject:** Marijuana farm at Sun Valley

I STRONGLY oppose the plan to put a marijuana grow and Sun Valley Farm in Arcata. It is not in the best interest of this community. The health of the people and the integrity of the environment are being compromised. Please don't allow more degradation to Arcata and the County. We are to be good stewards of the land and this is all about the money. Don't sell us out for THIRTY PIECES OF SILVER.

## Yandell, Rodney

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**From:** Phil Myers <phillymary89@gmail.com>  
**Sent:** Friday, February 26, 2021 8:12 AM  
**To:** Yandell, Rodney  
**Subject:** Cannabis farm

Good morning I would just like to start off with Sun valley is a great place to work. When I started I had nothing. This company has helped me grow as a productive member of this community the staff and leaders of this business has the well being of the community and its employees at all times. If something like a cannabis farm was being planned out by the leadership of sun valley I'm pretty sure the happiness of the whole community would be first priority. I believe transparency is not a problem if people were to educate themselves with the full plan I think it would make a lot more sense than spreading hate and negativity for something that has been a long time coming I think the misinformation going around needs to be nipped in the bud that way everyone can be on the same page

Thank you for your time

Philip Myers  
7072730572

## Yandell, Rodney

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**From:** Amy Carrieri <amy.carrieri@gmail.com>  
**Sent:** Friday, February 26, 2021 8:14 AM  
**To:** Yandell, Rodney  
**Subject:** Arcata Land LLC - Permit Approval

Ryan Dell, or To Whom It May Concern,

I wanted to send my support for the Arcata Land Company LLC's approval for permits to use their AG land for a cannabis cultivation operation.

I have worked for Sun Valley Floral Farms for 18 years. Sun Valley is one of the only local AG farming companies that has offered a good paying job, allowing me to make a living to stay in Humboldt County. I have been able to support my family, and buy a house with the consistent work.

Sun Valley Floral Farms is a conscientious grower for the past 50 years in the bottoms of Arcata, CA, participating in rigorous third party independent inspections and certifications from The Rainforest Alliance, for many years.

We must support our local businesses and farmers, that have proven track records of consistently offering jobs and long term generation of dollars into Humboldt County's economy.

I have confidence you will approve Arcata Land Company LLC permit request, as a local and long standing AG farmer in Humboldt County.

Thank you,  
Amy Carrieri  
[Amy.carrieri@gmail.com](mailto:amy.carrieri@gmail.com)

## Yandell, Rodney

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**From:** Tracy Walker <twalker76@hotmail.com>  
**Sent:** Thursday, February 25, 2021 9:20 PM  
**To:** Yandell, Rodney  
**Subject:** Arcata Land Company, LLC Commercial Cannabis Outdoor Light-Deprivation and Mixed-Light Cultivation Project.

Hello Mr. Yandell,

I am commenting in response to the IS/MND for the Arcata Land Company, LLC Commercial Cannabis Outdoor Light-Deprivation and Mixed-Light Cultivation Project. I am a professional biologist who also happens to live in Arcata on Sunset Avenue, approximately 2.3 miles east of the proposed location.

Due to the large scale of this operation, I think the measures provided to make the project less than significant under CEQA should be rigorous. I found the mitigation measure *BR-1: Preconstruction Bird Surveys* related to protecting nesting birds under the Migratory Bird Treaty Act (MBTA) to be relatively weak.

*"Project-related vegetation management should occur outside the bird nesting season, (February 28 through September 1)."*

As shown by data from the Atlas of the Breeding Birds of Humboldt County, California (Hunter et al. 2005), several species that nest in the Humboldt Bay, such as Anna's hummingbird, are known to begin nesting and laying eggs well before March 1. Additionally, with the effects of climate change, many bird species in Northern California have shifted the start of building nests and laying eggs up to 12 days earlier in the calendar year (Socular et al. 2017). Indeed, it is standard for local city and county jurisdictions to establish a nesting season guideline of February 1 through September 1.

*"If project-related brush clearing must occur during the breeding season, a preconstruction nesting-bird survey shall be conducted by a qualified biologist no more than two weeks prior to Project activities."*

The proposed preconstruction nesting survey schedule is too long before construction. I have been hired on several major construction projects over the years to ensure compliance with the MBTA, and have observed many species that regularly build a nest and lay eggs over a 48-hour period, and several others that require less than one week to build a nest and lay eggs. These include species that would likely occur on the disturbed site and in adjacent habitat, such as killdeer, house finch, and black phoebe. The measure would be more rigorous with a shorter survey schedule of 5-7 days. There could be a separate measure for preconstruction surveys for nesting raptors, in which the 14-day period would be more appropriate. Also, there could be a staggered approach to these surveys to do a preliminary nesting songbird survey to assess bird activity 14 days prior to construction, then follow up with a more focused nesting songbird survey closer to construction, between 3-5 days before activities start.

Thank you,

Tracy Walker  
Arcata resident

Hunter, John E, and Redwood Region Audubon Society. Atlas of the Breeding Birds of Humboldt County, California. Eureka, CA: Redwood Region Audubon Society, 2005.

Jacob B. Socolar, Peter N. Epanchin, Steven R. Beissinger, and Morgan W. Tingley. 2017. Phenological shifts conserve thermal niches in North American birds and reshape expectations for climate-driven range shifts. *Proceedings of the Natural Academy of Sciences*. Volume 114 (49).



## Yandell, Rodney

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**From:** Easton Connell <eastonconnell@gmail.com>  
**Sent:** Friday, February 26, 2021 9:31 AM  
**To:** Yandell, Rodney  
**Subject:** Sun Valley Proposed Development in the Arcata Bottoms

Good morning Mr. Yandell,

I live on 27th Street in Arcata and just learned yesterday about Sun Valley's plans to build an enormous cannabis facility down the street from my house. I work in the cannabis industry and generally support the growth of one of our county's most valuable industries, but must file a complaint about this proposed facility.

My street is not prepared to handle the increased traffic this project would bring. 27th Street is narrow, poorly maintained, and has essentially no sidewalks for pedestrians. Dozens of folks walk their dogs up and down this street throughout the day (myself among them) and the only thing making that remotely safe is the limited traffic on 27th Street. There are also children that ride their bikes, walk, and play in this street as well. Increased traffic without additional planning and infrastructure will make this situation dramatically more hazardous for pedestrians and the children of my neighborhood. If Sun Valley ends up moving forward with this project, local government must improve the road and add sidewalks to mitigate the hazards posed by a dramatic increase in traffic on 27th Street.

I also feel compelled to file a complaint about this project based on the company that is proposing it. Sun Valley has a terrible reputation for labor rights violations and for abusing the undocumented workers they employ. I have many friends in our community who have worked at Sun Valley when they had no other option and I've heard terrible stories of the working conditions and work environment. Sun Valley's labor abuse has even made it into the news on more than one occasion. In the recent Lost Coast Outpost article about the proposed project, the CEO of Sun Valley goes on record complaining about having to pay minimum wage and provide health insurance to his employees. I support job creation in our community, but these are not the kind of jobs that will enrich the lives of our community members and genuinely support our local economy. Moreover, Sun Valley and their terrible track record of labor abuse is not the face we want to put on Humboldt cannabis. Humboldt's reputation is built on craft farmers who care for the plant and cultivate some of the best cannabis on the planet. The poor quality of cannabis that will inevitably come out of a large scale operation run by people motivated only by profit, paired with Sun Valley's terrible reputation and track record of labor rights violations, will be a blight on Humboldt cannabis, and can damage the integrity and value of cannabis produced in our entire region.

Moving forward with Sun Valley's proposed project will not benefit the members of my neighborhood, Humboldt's cannabis industry, our local economy, or the citizens of Humboldt. It seems to me it will only benefit Lane DeVries. We must make planning decisions based on the needs of our community, not the wants of a single person.

I would like to ask you what additional actions my neighbors and I can take to make our voices heard and to prevent this sordid project from moving forward.

Thank you,

-Easton Connell

## Yandell, Rodney

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**From:** Byron Williams <byronjamalwilliams@icloud.com>  
**Sent:** Friday, February 26, 2021 9:45 AM  
**To:** Yandell, Rodney  
**Subject:** Sun Valley Floral Farms.

Hello, my name is Byron Williams & I work here at Sun Valley Floral Farms. I'm emailing regarding the change that may be happening here on the farm. I truly believe this a good move for all parties involved in this decision. Not only this will bring new jobs to area but also include job security for the people that's been working here for years. Most importantly it would save Sun Valley & what Lane Devries has built for himself. This company has been nothing but good to this community & the people. Sun Valley gave me my 1st opportunity for employment. Definitely helped me mature as a man & helped me grow as a person. I'm pretty sure most of people feel the same as I do.

Thank you for your time.  
Sent from my iPhone

## Yandell, Rodney

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**From:** JW <jayuubrown@yahoo.com>  
**Sent:** Friday, February 26, 2021 9:48 AM  
**To:** Yandell, Rodney  
**Subject:** Comment Regarding the Arcata Land Company Permit

Greetings,

I am writing in response to the Lost Coast Outpost article regarding the Arcata Land Company Cannabis permit. As a local resident it is heartbreaking to drive through town and see the number of empty buildings, empty store fronts and vacant lots. This was a thriving community at one point. I would like to see business grow, expand and thrive here in Humboldt County. We need jobs, we need dollars staying in the community, we need the tax dollars businesses generate to improve our public programs. That old Simpson yard was a bustling, active center of industry a few decades ago. We need to revitalize industry so our children have opportunities to stay local, keep unemployment low and provide income for people to live on and do things like become home owners. The community needs more projects like this.

Regards,

James Brown, Eureka resident

## Yandell, Rodney

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**From:** Joanna Apolinar <JApolinar@tsvg.com>  
**Sent:** Friday, February 26, 2021 9:58 AM  
**To:** Yandell, Rodney  
**Subject:** sun valley

I joanna Apolinar

I work here for 10 year I see lot negative commentary is because the person no work here I happy with sun valley because give me opportunity for me and my family thanks for you time

## Yandell, Rodney

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**From:** Sarah V <lovetoyoualways@gmail.com>  
**Sent:** Friday, February 26, 2021 10:06 AM  
**To:** Yandell, Rodney  
**Subject:** Re: Please do not allow Sun Valley

I apologize for confusing your name! Should have addressed you by your actual name Rodney...please excuse me!

On Fri, Feb 26, 2021 at 10:03 AM Sarah V <[lovetoyoualways@gmail.com](mailto:lovetoyoualways@gmail.com)> wrote:

Hello Ryan,

I am a parent of two children at Pacific Union School and learned today from another parent of the possibility of Sun Valley growing a Cannabis Farm near their current location. I have never been comfortable with Sun Valley being so close to the school, or even in our community. Toxic chemicals are used in the spraying of their plants, and the school is downwind from this. To grow their farm even further increases the risk of these chemicals causing harm to all the children at the school, as well as the hundreds of families that also live downwind from this farm. Please, for the safety of my children and all of the children at the school, do not allow this to happen. How it was originally allowed to be placed so near to a school and residential neighborhood is beyond me. Please, please, please, keep my children safe and do not allow this expansion.

Thank you,

Sarah

## Yandell, Rodney

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**From:** Marisol Hernandez <MHernandez@tsvg.com>  
**Sent:** Friday, February 26, 2021 10:11 AM  
**To:** Yandell, Rodney  
**Subject:** Sun Valley Employee in Oxnard

Hello there!

I'm a Sun Valley employee and am super excited that our company was able to lease the land we have available. I'm very lucky to work for a great company because they care to keep us in business. Not just on the business aspect but because Lane truly cares about keeping all of us employed and is doing everything in his power to keep us employed and selling flowers! Knowing the lengths in which he is going is extremely encouraging for me and for all my fellow co-workers in Humboldt county.

Stay safe and healthy!

Thank You,

Marisol Hernandez  
Sales Representative  
The Sun Valley Group  
3132 E. Pleasant Valley Rd  
Oxnard, CA 93033

Skype : mhsuns924

**DIRECT: 707-825-5746**

**CELL PHONE: 805-816-1930 (TEXT ME)**

Email: [mhernandez@tsvg.com](mailto:mhernandez@tsvg.com)

Main line: 1-800-747-0396 (ext. 5746)

Sales Fax: 1-707-826-8706



*"We need joy as we need air. We need love as we need water. We need each other as we need the earth we share."*

*Maya Angelou*



## Yandell, Rodney

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**From:** Collin Klein <collinklein@hotmail.com>  
**Sent:** Friday, February 26, 2021 10:21 AM  
**To:** Yandell, Rodney  
**Subject:** Public Comment - Arcata Land Company Permit - Please Approve

Rodney:

I am reaching out to request your approval of the permit for Arcata Land Company.

I am an employee at The Sun Valley Group, Inc. and have been a resident taxpayer in the community since moving here in 2010 for a job with Green Diamond/California Redwood Company. Due to contractions in the timber industry, I was laid off from there and had to go find work out of the area until I was able to find employment at Sun Valley. Sun Valley and its sister companies are not uncaring evil corporations that the local press like to make them out to be. Have they made some mistakes throughout their history. Yes they have. They have paid the price for those mistakes, have learned from them and are better for them today.

Sun Valley lives by the following guiding principles:

- #1 Be the best that you can be
- #2 Treat neighbors like you want to be treated
- #3 Inspire others and always keep learning,
- #4 Treat team members with respect
- #5 Keep our workplace safe and clean.
- #6 Delight and amaze customers
- #7 Foster a team culture
- #8 Instill opportunities for all
- #9 Continuously improve and innovate
- #10 Always remain humble and gracious
- #11 In everything we do, think like an entrepreneur
- #12 Heart for the business leads to success
- #13 Profitability of the company equals jobs
- #14 Give thanks always
- #15 Honesty lasts longest

The approval of this permit is the best chance me and my 100's of fellow team members have of maintaining our status as employed tax paying citizens of Humboldt County. My employment and ability to provide for my family depends on this vote. Please take this into consideration when making your decision.

Sincerely,  
Collin Klein



## Yandell, Rodney

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**From:** Bridget McGraw <bridget.mcgraw.fc@gmail.com>  
**Sent:** Friday, February 26, 2021 10:26 AM  
**To:** Yandell, Rodney  
**Subject:** Sun Valley Cannabis Plans, public comment/complaint

Hello Mr. Yandell,

I live on 27th Street in Arcata and learned about Sun Valley's plans to build an enormous cannabis facility down the street from my house. My partner and many friends work in the cannabis industry and we all generally support the growth of one of our county's most valuable industries, but I must file a complaint about this proposed facility.

My street is not prepared to handle the increased traffic this project would bring. 27th Street is narrow, poorly maintained, and has essentially no sidewalks for pedestrians. Dozens of folks walk their dogs up and down this street throughout the day (myself among them) and the only thing making that remotely safe is the limited traffic on 27th Street. There are also children that ride their bikes, walk, and play in this street as well. Increased traffic without additional planning and infrastructure will make this situation dramatically more hazardous for pedestrians and the children of my neighborhood. If Sun Valley ends up moving forward with this project, local government must improve the road and add sidewalks to mitigate the hazards posed by a dramatic increase in traffic on 27th Street.

I also feel compelled to file a complaint about this project based on the company that is proposing it. Sun Valley has a documented terrible reputation for labor rights violations and for abusing the undocumented workers they employ. I have many friends in our community who have worked at Sun Valley when they had no other option and I've heard terrible stories of the working conditions and work environment. Sun Valley's labor abuse has even made it into the news on more than one occasion. In the recent Lost Coast Outpost article about the proposed project, the CEO of Sun Valley goes on record complaining about having to pay minimum wage and provide health insurance to his employees. I support job creation in our community, but these are not the kind of jobs that will enrich the lives of our community members and genuinely support our local economy. Moreover, Sun Valley and their terrible track record of labor abuse is not the face we want to put on Humboldt cannabis. Humboldt's reputation is built on craft farmers who care for the plant and cultivate some of the best cannabis on the planet. The poor quality of cannabis that will inevitably come out of a large scale operation run by people motivated only by profit, paired with Sun Valley's terrible reputation and track record of labor rights violations, will be a blight on Humboldt cannabis, and can damage the integrity and value of cannabis produced in our entire region.

Moving forward with Sun Valley's proposed projection will not benefit the members of my neighborhood, the cannabis community, our local economy, or the citizens of Humboldt. It seems to me it will only benefit Lane DeVries. We must make planning decisions based on the needs of our community, not the needs of a single person.

I would like to ask you what additional actions my neighbors and I can take to make our voices heard and to prevent this sordid project from moving forward.

Thank you,  
Bridget

## Yandell, Rodney

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**From:** Jeffrey Stetzel <stetzelbuilders@gmail.com>  
**Sent:** Friday, February 26, 2021 10:50 AM  
**To:** Yandell, Rodney  
**Subject:** The Sun Valley Group, Arcata CA

Good morning,

I wanted to take a couple of minutes this morning, as a community member, and business owner to weigh in on Cannabis cultivation at TSVG.

TSVG has a history in our community as an agricultural steward, and employer of over 400 people.

Humboldt County has a history of agriculture, and international reputation for Cannabis cultivation.

I could stop here, the handshake relationship is easy to see.

Hand in hand.

Flowers are flowers.

Salt of the earth, dirt farmers.

It's a responsible cash crop, and one that we as a community have embraced for decades.

We need to utilize the infrastructure that's already in place, to promote ag stewardship, and continue to employ 100's of workers.

Thanks for taking the time, and enjoy your weekend.

Jeff Stetzel

Stetzel Builders Inc.

## Yandell, Rodney

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**From:** Rodi Groot <RGroot@tsvg.com>  
**Sent:** Friday, February 26, 2021 11:05 AM  
**To:** Yandell, Rodney  
**Subject:** Sun Valley

Dear planning commission;

I have been employed by Sun Valley for 14 years and I have been able to grow with the company into executive leadership position.

In this position I am responsible for sales to grocery chains across the nation of which many have reached out and wanted to make sure we would continue to grow flowers.

We are the nation's largest flower grower with a phenomenal reputation.

I remember the days the farm had yearly open house for the local community to see what flower farming all is about. I remember the days the farm helped put on the 4<sup>th</sup> of July fireworks display.

I know we will not become a bother of our neighborhood there that goes straight against the core principles of our company.

All we want to do is to add value in all we do hence we love growing flowers there they make everyone smile and happier.

Grasjas,

Rodi Groot

The Sun Valley Group

Mass Market Sales Manager

Phone 1(707)825-5768

Cell 1(805)797-4819

*"I am a great believer in luck, and I find the harder I work, the more I have of it" Thomas Jefferson*

## Yandell, Rodney

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**From:** Hans Meester <HMeester@tsvg.com>  
**Sent:** Friday, February 26, 2021 11:17 AM  
**To:** Yandell, Rodney  
**Subject:** Sun Valley Cannabis

Dear Mr. Yandell,

Through this e-mail I would like to express my support for the legal cannabis project that is proposed for the Arcata bottoms. Although I am not a fan of drugs (soft or hard) in general I think cannabis is, like alcohol, something we have to accept in our society and we might as well try to make it work with benefits for all. This is the pragmatic way other countries deal with it too.

1. It will be a legal operations, which means the proper permits will be present, the law of the land applies and taxes/fees will be paid
2. It will be a legal operations, which means no illegal (mis)use of our precious wilderness, no deviation of streams, no illegal clear cutting, no toxic runoffs, etc
3. A company with tons of experience in high quality plant/flower growing is going to be involved. This means a responsible and economical approach towards use of chemicals, fertilizers and energy (read lighting) can be guaranteed
4. Compliance with OSHA rules and federal and state labor laws. No use of banned pesticides
5. Infrastructure for the operations is already largely in place.
6. Work for a steady work force, providing income for various families and chances for people to improve their lives

Sun Valley somehow does not have the best reputation in the community, but we cannot forget that this is a place where there is always opportunity to grow, The company provides healthcare, 401K, vacation days and for me one of the best virtues here is that everybody has a chance. Sun Valley provides first, second, third up to tenth chances for people with all kind of histories who do not get those chances in other areas. Sun Valley is one of the bigger employers in the area and Humboldt needs the economic activity. If Cannabis is a way for this company to survive and stay in business, the I support this plan.

Hans Meester  
Sun Valley employee since 2014

## Yandell, Rodney

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**From:** Conor Maguire <CMaguire@tsvg.com>  
**Sent:** Friday, February 26, 2021 12:13 PM  
**To:** Yandell, Rodney  
**Subject:** SUN VALLEY CANIBIS  
  
**Importance:** High

To Whom it may concern,

I have been a Sun Valley team member for over 2 decades, and at 43 years of age, I do not know much else in terms of work. Sun Valley gave me a chance in September of 1999, and I have been here since, working my up from the bottom. From the packing house, to national sales, I have seen many changes here. This is just another change , and quite honestly something we need to do to maintain our viability as one of the largest employers in Humboldt county. I believe we have around 450 or so team members. What happens if we close our doors? That is something nobody should have to think about. This company cares about its team members, always has, always will. Lane is a great leader and has great vision for the future. This is simply another change we all need to embrace. There is no reason not to.

Thank you for your time.

Sincerely,

Conor Maguire

Conor Maguire  
The Sun Valley Group  
National Sales Representative  
800-747-0396 ext 5844  
**Email – [cmaguire@tsvg.com](mailto:cmaguire@tsvg.com)**  
**Direct line – 707-825-5844**  
**Skype – conorsvg**  
[www.tsvg.com](http://www.tsvg.com)

## Yandell, Rodney

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**From:** leslie quinn <coyotewind15@gmail.com>  
**Sent:** Friday, February 26, 2021 12:26 PM  
**To:** Yandell, Rodney  
**Subject:** Proposed Sun Valley Cannabis Farm

good morning. I have lived in Arcata since 1972 and am horrified at this request from Sun Valley Farms for a huge hoop house grow in our peaceful Arcata bottoms. Many friends have lived near or adjacent to the bulb farm, which uses pesticides including Monsanto without notifying nearby schools, churches, farms and private residences. So many have moved out of the bottoms because the water there is so toxic it burns their scalps in the shower and makes their hair fall out. Terra Farms, Green Spiral Farms, Tule Fog Farms, many dairy farms ( Organic Valley), St. Mary's church and school, Coastal Grove School, Fuente Nueva School, hay fields and the food kitchen rented out by St. Mary's are close to the parcel. Foster road is beyond need of repair and is a transient camping and garbage dumping ground, which would be the access road to this corporate mega grow.

A mega grow takes an enormous amount of electricity and water. It is impossible for this process to be completely organic. Clones are impossible to make organically. Where will all the poison, toxic runoff and aerial particulates go? The entire nightscape and starscape will be Ruined for hundreds of several generation neighbors, renters and farmers. Why should a corporation known for treating workers badly be granted a permit? What about all the mom and pop original grows from the 70s that are people who clearly can't even afford the costly and weighty permitting fees by the county, yet Sun Valley wants to streamline this permit and step on everyone. Pro corporate bias is clearly at play here. I haven't had a job in a year either., Simply because the flower business is waning is no excuse to grant this permit. We all have to figure out the pandemic. I feel confident Sun Valley can also figure something else out. A cannabis mega grow is not the solution for them. Cypress Grove Chevre listened to the people who were concerned about goat farm water runoff and moved their goats from the bottoms to McKinleyville, and that was Only runoff from a goat farm. This permit cannot be granted to Sun Valley. Many neighbors do not even know about this proposal. I have faith that you will do the right thing and deny this ridiculous permit.. Thank you for your kind attention to this very serious matter.

sincerely, bottoms neighbor Leslie Quinn

## Yandell, Rodney

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**From:** Veronica Mariano <peekn3d4d@gmail.com>  
**Sent:** Friday, February 26, 2021 12:54 PM  
**To:** Yandell, Rodney  
**Subject:** Sun Valley Floral Farms

Hi Randell,

I'm writing this email to express my concerns about Sun Valley Farm being granted one million square feet of cannabis production. Humboldt County does NOT need a mega grow. This is going to cripple mom and pop farmers that have worked on getting their permits granted and spending their whole life savings doing so. Please do NOT approve this permit. Many livelihoods will be at stake at the hands of greed. Nobody needs this size farm. It seems absolutely ridiculous to even be considering this. Thank you for your time and consideration. I'm hoping that you decide to do the right thing and reject this application.

Respectfully,  
Veronica Mariano  
RE/MAX Humboldt Realty  
2222 Myrtle Ave., Eureka, CA 95503  
DRE#02075514  
707 498-8685

## Yandell, Rodney

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**From:** Wendy Herrera <mrs.wendyherrera@gmail.com>  
**Sent:** Friday, February 26, 2021 12:56 PM  
**To:** Yandell, Rodney  
**Subject:** Public Comment - Opposition of Sun Valley Cannabis Farm

Hi Rodney,

Thank you for taking the time to read this email. I live on Ernest Way and have 2 children that attend Pacific Union.

I understand that Sun Valley Farm is currently struggling and I empathize with them. However, I don't think that a cannabis farm this close to our house and my kids school is a good idea. I think the environmental concerns and pollution could be detrimental to our health and our property values.

Thank you for taking the community comments under consideration.

Thank you,  
Wendy Herrera



## Yandell, Rodney

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**From:** Mike Phaneuf <MPhaneuf@tsvg.com>  
**Sent:** Friday, February 26, 2021 12:56 PM  
**To:** Yandell, Rodney  
**Subject:** SUN VALLEY EMPLOYEE

Dear sir

Hello my name is Michael Phaneuf and I have been an employee of Sun Valley for over 20 years. During this time Lane Devries and Sun Valley have been a fair and good company to work for. Every employee has health care and have access to a 401 K. There was a time when I was between homes and waiting for my new house to be finished that Lane let me stay on the farm till my home was ready to move into. My coworker came down with brain cancer and Sun Valley kept him on our health care for almost six months even though he was not able to work and he passed away. During the good times we are like one big family with holiday parties and team lunch meetings. Hopefully once we are thru Covid the good times will be back. Seen allot of bad comments about Sun Valley and Mr. Devries but as a 20+ year employee I am proud to be a Sun Valley team member.

Thanks  
Michael Phaneuf

Mike Phaneuf  
National Sales Representative  
3132 E. Pleasant Valley Rd  
Oxnard, CA 93033  
(707)-825-5725



## Yandell, Rodney

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**From:** Francisco Herrera <mr.frankherrera@gmail.com>  
**Sent:** Friday, February 26, 2021 1:18 PM  
**To:** Yandell, Rodney  
**Subject:** Sun Valley

Hello Rodney,

We are residents of Arcata and have some concerns about Sun Valley changing their focus to growing cannabis. We understand their business struggles, but we are more concerned about the potential negative effects of having such a large scale industry.

### Concerns

1. The health and well-being of our children and all other folks. How ensure that there are no harmful effects on the community and the ecosystem.
  1. Pollution
    1. More vehicles
    2. Processing systems
    3. Pesticides
    4. Chemicals leaching into the local water
    5. Fertilizers
    6. Noise (late shifts and machinery)
  2. Safety
    1. Increased traffic
      1. speeding and other traffic incidents
      2. more accidents
      3. more crime due to increased foot traffic
  3. Home values
    1. Decreased value

Thank you for your time,

Frank Herrera

*Frank Herrera*

## Yandell, Rodney

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**From:** Debbie Hartman <DHartman@tsvg.com>  
**Sent:** Friday, February 26, 2021 1:25 PM  
**To:** Yandell, Rodney  
**Subject:** FW: Arcata Land Co. Proposal for A Legalized Grow Farm in Arcata next to the Sun Valley Floral Farms

Trying one more time

**From:** Debbie Hartman  
**Sent:** Friday, February 26, 2021 12:18 PM  
**To:** ryandell@co.humboldt  
**Subject:** Arcata Land Co. Proposal for A Legalized Grow Farm in Arcata next to the Sun Valley Floral Farms

Some positive considerations:

I am a 73 year old woman who has worked for The Sun Valley Floral Farms for over 15 years in the compacity as a manager of the West Coast Evergreen Division. I have a very good salary as well as many , many other employees of the Sun Valley Team. Sun Valley Floral Farms is known locally to be an excellent employer for many Sales and Managing positions especially coming out of HSU. In my case I am lucking to be ending my work life at the Sun Valley Family Farm. We don't get to hear all the good things our Sun Valley Farms has done for our county with Lane Devries as our Executive Leader . I know many Schools and Churches as well as Non Profits are especially happy to have the Floral Farm in our Community. Lane has been very generous to our community . He leads with Humility and Honesty .

This is why I am sending along my thoughts concerning the proposed Marijuana Legalized Grow Farm. I am aware there has been a few past proposals for one in our county. However, not on agricultural land and not by a professional Flower Farmer who has Humboldt County as his home and a past performance showing such a commitment to our community.

This is indeed an ideal proposal for not only the land to have it but also the people responsible for the legalized grow. I know first hand The Sun Valley Farm as a very positive relationship with our County Ag. Department . I am also aware the 2 entities will be separate. [ Flower Farm versus Marijuana Farm } It is important to me that we now have marijuana cultivated under the positive environment of government conditions. We want to keep our natural environment free from chemicals and waterways clean and safe. It is also very unfortunate for all of us to have the pandemic interfere with so many businesses around our world. This make the timing of the proposal extra worthy to proceed for all of us. Please take some of my opinions under advisement so we can help as many people in our county as well as our country.

Thank you for your consideration,  
Deborah Hartman,  
14 12 I street Eureka, Ca.  
7076162688

## Yandell, Rodney

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**From:** Teri Gross <TGross@tsvg.com>  
**Sent:** Friday, February 26, 2021 1:26 PM  
**To:** Yandell, Rodney  
**Subject:** sunvalley

SunValley has been a good thing for this area. All of the people that are complaining dont know the the good side or they just dont want to see the good.

I was on felony probation when I applied at SunValley.i was 45 yrs old no work experience and new to living a drug free life.Had to

Sent via the Samsung Galaxy A10e, an AT&T 4G LTE smartphone

## Yandell, Rodney

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**From:** Cindy Stetzel <CStetzel@tsvg.com>  
**Sent:** Friday, February 26, 2021 1:47 PM  
**To:** Yandell, Rodney  
**Subject:** Sun Valley Cannabis Proposal

Good Afternoon Mr. Yandell,

My name is Cindy Stetzel. I work here at Sun Valley. I have worked in Arcata the vast majority of my career, first at Humboldt Internet, then many, many years at Tomas, Cypress Grove, and now Sun Valley.

Having spent so much of my life working in Arcata, and specifically in the bottoms, I feel I can say with confidence that this project will not significantly change the look and feel of Arcata. On the other hand, losing Sun Valley, would significantly change the look and feel of all of Humboldt County, in an economically devastating way.

I worked at Tomas Jewelry / Toucan Inc from 1998 until the company was sold in 2016. I saw that business change in many ways over the years and I saw the emotional and financial toll it took on our employees as we tried to right size, and then when we ultimately sold. Watching so many people lose their jobs is not a pleasant sight, and I certainly don't want that to happen to our community again. By comparison, Sun Valley generates a significantly greater revenue, and employees at least 6 times as many people.

While of course we will have to do due diligence to make sure the best interests of our neighbors are not only considered, but respected, it is just as imperative that we keep this business and these jobs here in Arcata and Humboldt County. Furthermore, if we have the ability to add jobs to this great community, we owe it to each other to approve this project!

Thank you for your time.

Cindy Stetzel  
(707) 572-8885

## Yandell, Rodney

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**From:** Dawn McGuire <dawnjhill@aol.com>  
**Sent:** Friday, February 26, 2021 2:45 PM  
**To:** Yandell, Rodney  
**Subject:** Comments on Arcata Land Company Proposal, Initial Study, Mitigated Negative Declaration

From: Dawn McGuire, County Resident, Neighbor to the Bulb Farm

1. The area of the project should be within the Coastal Zone and the project should be reviewed by the Coastal Commission. According to Section 3.3, the project is in the same soil (Jolly Giant) and at the same elevation (25 feet) as my farm, which is within the Coastal Zone. A glance at Google Earth indicates the project area should be within the coastal zone, based on its proximity to tidal channels (<1,000 feet) and its position seaward from Coastal Zone properties.
2. The bulb farm currently has a significant impact on air quality because they stir up dust and they intermittently release noxious gases. I have experienced both problems. I believe the bulb farm does not act responsibly, is not adequately monitored, and the impact on Air Quality will be greater than stated in the Initial Study based on my experience living next door.
3. Regarding the open LUST case (the Leaking Underground Storage Tank on the adjacent Parcel), was the tank removed? Was the polluted material removed? Is the LUST site capable of affecting the project site? Was a Phase II study done?
4. This proposed project will increase the use of groundwater from April through October, including the driest months of the year. The well may be existing, but the project will increase the amount of water drawn from the well. This will lower the level of groundwater in this well and other wells that may occur nearby.
5. A study is needed regarding the effects on surrounding private wells during the driest months. The project can result in significant changes to existing land use, including the use of groundwater for drinking and irrigation. We have seen groundwater drop significantly in late summer, especially in dryer years. Table D shows that July and August are proposed to be very high use on the proposed project and these are the driest months in the bottoms.
6. The Sun Valley Flower Farm and the Proposed Project are Heavy Industry and are inconsistent with a greenbelt.
7. Noise levels are extremely high at the bulb farm, based on personal experience. The grading alone could be very noisy. This is not a greenbelt experience.
8. The five nearby residences are significant. Their property values will decrease if the project is approved. If the project creates further noise, air, and water issues, additional property values will decrease. Using the words "sparsely populated" does not lessen the damage. This would displace people by creating a nuisance. I see 11-12 nearby residences.

Dawn McGuire  
3787 Spear Avenue  
Arcata, CA  
707-599-8652

## Yandell, Rodney

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**From:** joannemmcgarry@yahoo.com  
**Sent:** Friday, February 26, 2021 3:06 PM  
**To:** Yandell, Rodney  
**Subject:** Sun Valley's Cannabis Project

I hope to write more later but

Haiku Opposing Cannabis Project Near Arcata

The climate crisis  
Means large scale cannabis can't  
Continue to spread

I intend to voice my opposition to this project with the Board of Supervisors and at the public hearing.

Sincerely,

Joanne McGarry  
1-707-791-6837  
POBox 5313  
Arcata, CA 95518

## **Yandell, Rodney**

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**From:** Teri Gross <TGross@tsvg.com>  
**Sent:** Friday, February 26, 2021 3:15 PM  
**To:** Yandell, Rodney  
**Subject:** RE: sunvalley

I'm sm sorry my last email was cut off my point is 15 yrs later im still working at sunvalley therealot of good at sunvalley that people should look at thank you

Sent via the Samsung Galaxy A10e, an AT&T 4G LTE smartphone

----- Original message -----

**From:** "Yandell, Rodney" <RYandell@co.humboldt.ca.us>  
**Date:** 2/26/21 1:39 PM (GMT-08:00)  
**To:** Teri Gross <TGross@tsvg.com>  
**Subject:** RE: sunvalley

Thank you for your comments. I will add them to the record for the review and consideration of the Planning Commission.

Thank you,

Rodney Yandell  
Senior Planner  
Cannabis Services Division  
Planning and Building Department  
707.268.3732

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**From:** Teri Gross <TGross@tsvg.com>  
**Sent:** Friday, February 26, 2021 1:26 PM  
**To:** Yandell, Rodney <RYandell@co.humboldt.ca.us>  
**Subject:** sunvalley

SunValley has been a good thing for this area. All of the people that are complaining dont know the the good side or they just dont want to see the good.  
I was on felony probation when I applied at SunValley.i was 45 yrs old no work experience and new to living a drug free life.Had to

Sent via the Samsung Galaxy A10e, an AT&T 4G LTE smartphone



## **Yandell, Rodney**

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**From:** Mary Bruhn <mlbruhn@gmail.com>  
**Sent:** Friday, February 26, 2021 3:06 PM  
**To:** Yandell, Rodney  
**Subject:** Sun Valley

I support the Sun Valley Group's proposed cannabis cultivation project. More jobs!

Sincerely,

Mary Bruhn  
McKinleyville CA

## Yandell, Rodney

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**From:** Tim Crockenberg <TCrockenberg@tsvg.com>  
**Sent:** Friday, February 26, 2021 3:31 PM  
**To:** Yandell, Rodney  
**Subject:** Sun Valley cannabis project

To: Rodney Yandell  
Re: Sun Valley Cannabis Project

As a student of College of the Redwoods in the early 90's, I was fortunate to have the opportunity to take a tour of Sun Valley with my nursery practices class. I knew immediately that growing flowers was to be my future.

I began an internship the following month. I spent the next two years finishing my classwork at CR, while working through all the departments on the farm, gaining invaluable knowledge and experience in floriculture. I transferred to Cal Poly SLO where I earned my degree in Environmental Horticultural Science.

Just before graduation, I called Lane to see if there were any job openings. I wanted to come back to Humboldt, work for the farm that started me on my career path, and raise my family.

That was 20 years ago. I can't imagine having to move myself and my family out of the area to seek similar employment. The solution to saving the farm, and the 500 team members and their families, is at our fingertips.

I know Lane well and I know he cares deeply for the community. I know without a doubt that Sun Valley will work with our neighbors to address their concerns. We've done so consistently over the decades. This is a huge opportunity for the people of Humboldt County. Skilled positions will be needed, and the local work force has many people with these skills that would now be able to stay in the area, make a good living, and raise families.

Sincerely,

Tim Crockenberg

## Yandell, Rodney

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**From:** Caren Matlock <CMatlock@tsvg.com>  
**Sent:** Friday, February 26, 2021 3:32 PM  
**To:** Yandell, Rodney  
**Subject:** Input regarding The Sun Valley Group's request for cannabis permit

Hi, Rodney!....

I want to provide input on Sun Valley's request for cannabis permits on some of our land/parcels. I can understand our neighbors concerns for the land to be used for cannabis related production/activity. And I can understand that, to our neighbors, it probably doesn't matter *who* would be using the land.

By acquiring the cannabis permit on some of our land, we would be able to sell the land/parcels for a higher value. The gain from a future sale of the land would go towards reducing our debt and enable us to continue our operations here in Arcata, which provides employment to so many in the community. As it is for any business, there are economic challenges ahead with minimum wage increases. We have been preparing for those increases over the last few years, while striving to continue and perhaps increase our ability to sell flowers. As we grow, we can continue to offer gainful and meaningful employment to the community.

The parcel(s) that Sun Valley has requested cannabis permitting is large, with room for a future owner to landscape and blend their operations into the scenery, perhaps like Sun Valley has done with the tall trees around our property.

As a homeowner, I can understand and empathize with our neighbor's concerns and fears. Yet there is positive opportunity for the future to benefit the Arcata area, whether from Sun Valley as a flower grower, or from a future cannabis related company... particularly for employment opportunities.

As a Sun Valley Team Member, with the 400-500 fellow team members employed here in Arcata, I have concerns and fears for the economic future. I love my job, and hope to be here well into the future.

Thank you for your consideration for our request!

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**Caren M. Matlock**

Credit Specialist

The Sun Valley Group, Inc.

Direct: 707-825-5829

Toll Free: 800-747-0396 x5829

Fax: 707-826-8707

Email: [cmatlock@tsvg.com](mailto:cmatlock@tsvg.com)

Web: [www.TSVG.com](http://www.TSVG.com)



## Yandell, Rodney

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**From:** wmchatton@aol.com  
**Sent:** Friday, February 26, 2021 3:46 PM  
**To:** Yandell, Rodney  
**Subject:** Fwd: Failure Notice

To Humboldt County Planning and Building.(Rodney Yandell)

It was just brought to my attention that they are trying to get a Permit for a Cannabis Farm across the field from My House. The Sun Valley Site would be a very negative thing for the Value of My Property at 3659 Spear Av. Arcata Ca (as well as the value of all the other adjacent properties)

Grows like the proposed one:1) Lower Local Peoples Property Values.

2)Cause Air Pollution and most time, a very discussting smell.

3)Use a lot of chemical fertilizers and Pesticides that leach into the ground water and eventually pollute the Waters of Humboldt Bay

4) The other concern is the proximity to Schools. There are three Elementary Schools and A High School within a close distance to that site

I would ask that the Permit for that Sun Valley Industrial Cannabis Project be denied. I am sure that property could be utilized for something that would benefit the Local Community and Humboldt County in a much better and better accepted way.

Wayne McHatton

## Yandell, Rodney

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**From:** Juan Zaragoza <pjzaragoza@icloud.com>  
**Sent:** Friday, February 26, 2021 3:47 PM  
**To:** Yandell, Rodney  
**Subject:** the sun valley group, agree letter

I worked at Tomas jewelry until it close and we were around 130 employees, when the company decided that it would not continue it took us all by surprise, especially because we had been working for the company for many years, we all started looking for work immediately, however the Humboldt community is very small and forced many to go to unemployment as there were not many jobs open and/or job opportunities and this was long before the Covid-19 pandemic.

Sun Valley is one of the largest local companies that we have around in Humboldt, I cannot imagine what would happen if Sun Valley group were to leave more than 400 employees unemployed, all the families that depend on the company to bring bread to their table. If a small company of 130 caused a great impact in the community, 400 unemployed employees would be a very large local impact, the pandemic has come to change many things in our community and not only locally, but every day also more businesses closing, every day more people without jobs and depending on the government.

I agree that all of us in this pandemic have to adjust and I agree that the owner does everything possible to keep his 400 plus employees and his business, that the company tries brings the opportunity for more local jobs, and if is the cannabis business is doing it the right way, we all know that there is a lot of sites that do it illegally (from the news) and they don't pay taxes or insurance, if this company is doing the correct way let it go ahead because is not hiding nothing like this clandestine places that who know how many lives had already take.

Sun valley is train to do the right thing with permits, making people aware and using hoop houses and ventilation system and how will treat the smell (per article in lost cost), please let them continue and do not impact our community with more unemployment or closing business.

Thank you  
Pablo zaragoza

## Yandell, Rodney

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**From:** Susan <sueandscott@suddenlink.net>  
**Sent:** Friday, February 26, 2021 3:53 PM  
**To:** Yandell, Rodney  
**Subject:** Commercial Cannabis Application #12255.

Humboldt county Planning and Building Department

I am writing to submit comments on the Arcata Land Company Commercial Cannabis Application #12255.

I am a landowner at 2515 Wyatt Lane in Arcata. I live only one parcel away from the project and my property is in direct line of sight. There are no visual barriers between the project and my residence.

Even though I live one parcel away, I only learned about this project on February 25th (one day before the end of the 30- day comment period), and I only learned about it because it was covered in the local online news, the Lost Coast Outpost. There appears to have been very little public outreach and scoping even though there are potentially significant affects to both the social and environmental quality of the neighborhood. As observed in online comments, most people in the community were unaware of this project until the news and social media covered the story. I believe there are still community members affected by this project who are unaware due to the lack of public scoping.

First, a Mitigated Negative Declaration is not the appropriate analysis for the size and scale of this development. As discussed in the news, it appears this could be among the largest commercial cannabis operations in the North America(?). The project is very close to residences, schools, and a church.

This size and intensity of project has many significant issues (including health and quality of life) for the community and deserves an Environmental Impact Report-- not a Mitigated Negative Declaration. The noise, smell, light, social, and environmental affects have not been adequately documented in the Mitigated Negative Declaration to ensure significant impacts have been addressed and mitigated to less than significant levels.

The document apparently contains over 2,000 pages. The project proponent and the county should hold a public outreach meeting-explaining the project, seeking input, and allowing community members to ask questions.

My Initial concerns, without having time to fully read and comprehend the project (because I only read about the project in the news one day before the end of the 30-day MND period), include:

Smell: The document states fans and filters will be used to mitigate the smell, and if that is not sufficient, then “another method such as Ecosorb” would be used. What method will be used to monitor the air quality (including smell) and what levels would trigger adjustments? What happens if the “Ecosorb” method fails to control the smell? Who will monitor the air quality, how often, and what are the apriori acceptable levels of smell? Who will enforce compliance and what sanctions would be imposed if air quality fails?

Light pollution: The project states mixed light green houses will be covered at night. What if the covers fail to block out all the light. What level of light escape is acceptable and who will be monitoring compliance? What about security lights and ambient lighting? This type of lighting has the potential to have significant effects on the environment and community. The specific details are lacking in the MND. Referencing “dark sky standards” is too vague. This project is directly adjacent to the city of Arcata’s green belt area. Nighttime wildlife foraging and star gazing are some of the values intended for this rural area. The MND does not provide enough detail to ensure nighttime light levels will not impact the wildlife or the quality of life for the surrounding community.

This project deserves a public outreach meeting to fully scope for potential project effects, and an Environmental Impact Report should be prepared.

Thank you.  
Susan Sniado  
2515 Wyatt Lane, Arcata  
sueandscott@suddenlink.net

Sent from my iPhone

## Yandell, Rodney

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**From:** Howard D <howardd777@gmail.com>  
**Sent:** Friday, February 26, 2021 4:10 PM  
**To:** Yandell, Rodney  
**Subject:** Email in favor of the Arcata Land Company growing cannabis

To Humboldt County decision makers,

My name is Howard Doerfling, and I have been a senior human resources executive and manager, in the agriculture industry for nearly 30 years. I'm writing this email to express my opinion that the Arcata Land Company, and I am in favor of this group growing cannabis. In my many years of hiring and managing people in the agricultural and other industries, it is always great to see a community leader like Lane DeVries, take the initiative to plan out a legal and reputable expansion of established business here in the county.

The business expansion is being made by a group that is proven, licensed and legitimate. They are good neighbors and are in good standing with state and federal authorities, including immigration (ICE), OSHA and CALOSHA, city inspectors and health departments. This group has worked extremely hard to keep the community safe from COVID-19. This is a company that cares about the community and works to keep a safe, healthy, and productive environment and jobs for hundreds and hundreds of people over the last 4 decades. They have a track record that almost nobody in the area can match in terms of performance, honesty, and reliability.

Over the years I have seen hundreds of employees leave different companies to work at illegal cannabis grow operations. These illegal operations do not work with any safety or health concerns for their employees at any time. Often, they are polluted campgrounds of waste and they do not pay taxes or contribute anything to the local community. Additionally, illegal cannabis grows robs local and state communities of income and safety measures for their employees.

The Arcata Land Company and The Sun Valley Group have a proven track record and have always upheld all legal and safety measures possible. They have a fantastic reputation with their local neighbors as they always work together with the city in the county, most recently the Humboldt County health department to combat COVID-19 by multiple testing on all their employees. Very few companies value their employees and employee's health and wellbeing for themselves and their families as much as this group does.

I would encourage the county and all of the neighbors of the Arcata Land Company to have faith and trust in proven leadership and operations management capabilities to create a safe and healthy environment for both the employees and all local neighbors along with the local community. This group of companies has provided jobs in a legal common safe and taxpaying fashion for over 40 years. Very few employers will ever be able to match that record.

Additionally, If this company were to disappear or move away from the local community, there would be around 600 lost jobs, between full time and seasonal work. These are lost jobs that probably could not be replaced easily and would be a huge and heavy burden on the local community. Every employee lost means that local revenues will drop, people will be without benefits, and will only put more stress on the local community that is unneeded and unnecessary. If anybody can put together a plan to grow and be sustainable and operate and keep a good neighbor and great relations with the city, in the county it is this group.

Please allow this group to go forward with the plans for a legal and regulated business to help grow and foster even more paid employees in the local community. This will add needed tax dollars and benefits, while providing a healthy and safe work environment to those who go to work for this group.

Thank you.



Howard Doerfling

## Yandell, Rodney

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**From:** Kenneth Pocasangre <KPocasangre@tsvg.com>  
**Sent:** Friday, February 26, 2021 4:22 PM  
**To:** Yandell, Rodney  
**Subject:** The Sun Valley Group

Dear Mr. Dell,

Sun Valley has been a great part of this community and for me as an individual. I have learned and grown so much thanks to this company! Working with Sun Valley allowed me to pay for my school at Humboldt State University and be a part of this beautiful community. I've seen many people turn a new leaf thanks to this company. Sun Valley allows you strive and achieve your individual goals by working together with your fellow team members.

Sun Valley is a place where hope becomes a reality. Here at Sun Valley we lean on core values, have a mission statement, family, culture and so much more. Going to Sun Valley everyday feels like a blessing in disguise.

Thank you for your time.

Kenneth Pocasangre  
Human Resources Representative  
707-825-5714  
[kpocasangre@tsvg.com](mailto:kpocasangre@tsvg.com)



## Yandell, Rodney

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**From:** J <jillianjuju@gmail.com>  
**Sent:** Friday, February 26, 2021 4:31 PM  
**To:** Yandell, Rodney  
**Subject:** Cannabis farm at Sun Valley

Dear Mr. Yandell,

I have just recently learned of the proposal of Sun Valley to include a cannabis farm. I'm not sure why it wasn't more publicly shared, perhaps because it's in a county zone?

Please let me introduce myself. I moved to Humboldt county in 1977 to attend HSU. I fell in love with the area on a family camping trip and picked HSU because of it. I chose to stay, raise a family and teach in this county for 40 years. I do believe in the legalization of cannabis, but where it occurs and size is very important. Having lived here for this long, I have seen the good and bad of this. I own a home down the road from Sun Valley. The traffic is already unsafe at certain times of the day. I walk now in the bottoms, since the pandemic. I look at all the garbage, both alcohol and drug paraphernalia, and now used masks down the sides of the road of the entrance to the farm. I walk by employees getting high in their cars before work.

I'm also aware of the history of the chemicals used by Sun Valley and their lack of following the legal guidelines in their use and as well as their hiring of undocumented workers in the past. I'm not trusting of their practices or intent. I find it ironic that they pointed out how all their Easter flowers were dying in their greenhouses last year, but just delivered all the neighbors a free bouquet for this Valentine's day. It smacks a little of trying to appease the masses...now that I've learned of this proposal. Maybe they just didn't think of handing them out last year.

We have had illegal grows in the neighborhood, one was behind me. When this was happening, 3 cars in the immediate vicinity and a house behind it was broken into. Numerous neighbors contacted the Sheriff's Dept. We were referred to the landlord, who ignored us. I met with an officer and nothing came from that. Twelve neighbors had to seek legal help to threaten to sue the landlord for nuisance in order for them to even talk to the 4 adults living there and 6-10 transients a day coming in and out to trim, mainly between 11pm-4 am.

Although comparing an illegal grow to a legal one isn't an exact comparison. I think it's more important that it points out that the sheriff's dept is stretched too thin to adequately support one instance of the negative aspects that surround the grow industry. I'm concerned how adding a huge operation in general, let alone a cannabis one, would be even more demanding on the area for traffic and safety. From what I can see, it would be close to two schools and a church.

I'm also concerned for the birdlife that uses the wetlands as a migration path. It's lovely to hear the geese honking a flying over. The wildlife in general. I chose to buy my first and only house here because of the closeness to town, but I can still have raccoons, possums and yes, even skunks, in my yard. Last year I was visited by a fox twice. I don't want a huge industrial plant, more traffic, trash and dead animals on the road.

Thank you for reading this,  
Jillian Mooney  
3031 Alice Ave  
Arcata, Ca 95521



600 F Street, Ste 3 #911 Arcata, CA

February 26, 2021

Humboldt County Planning and Building Department  
3015 H St. Eureka, CA 95501  
via email to Senior Planner Rodney Yandell  
[ryandell@co.humboldt.ca.us](mailto:ryandell@co.humboldt.ca.us)

Re: Mitigated Negative Declaration

The Arcata Land Company, LLC Commercial Cannabis Outdoor Light-Deprivation and Mixed-Light Cultivation Project, Application No. 12255, Case No. CUP16-583

Dear County Planners,

This letter is written on behalf of the membership of Californians for Alternatives to Toxics (CATs), a public interest organization concerned about activities that harm the environment with toxic chemicals. Many CATs members live in the vicinity of or otherwise enjoy the Arcata Bottoms and its wildlife. The activities that are planned for the construction and operation of a huge cannabis factory in the Bottoms, on the edge of town in a lowland area where Humboldt Bay and the Pacific Ocean threaten vast changes to its current hydrology due to the impacts of climate change and where the environment is still reeling from the legacy of highly toxic pesticides used at the former Simpson Mill adjacent to the proposed cannabis factory and where extremely toxic pesticides used for decades in the vicinity by Sun Valley Flower farm, including many tens of thousands of pounds of methyl bromide and other chemical poisons used so toxic they have since been banned is of particular concern to our members.

A mitigated negative declaration for the proposed cannabis factory is inadequate to the requirements of California Environmental Quality Act (CEQA). It does not evaluate full potential of impacts, does not include a range of alternatives, and is biased towards a preferred alternative that is both misleading and oversimplified.

The proposed huge, 30 acre, 9<sup>th</sup> largest in USA, cannabis factory proposed for the Arcata Bottoms by Sun Valley Flower Farm, acting here as Arcata Land Company, LLC with both under the ownership of Lane DeVries, is being analyzed under CEQA as a mitigated negative declaration, is not up to analyzing the environmental effects of such a huge project. Not only is the project huge, the underlying document at 1,417 pages is huge and is, in addition, supported by numerous reports and analysis. Anytime so much information must be analyzed, a full

Environmental Impact Statement is required. A check list will not suffice. The organization of the material via the negative declaration is not conducive to public understanding and participation in the CEQA process, as important an aspect of the process as any other part. From reading the local newspaper, the Times-Standard where it was reported that John Ford, County Planning Director, waxed glowingly of the appropriateness of the project, any critical thinking person understands the existing bias toward supporting the project and the problems inherent with such bias: a tendency to let critical analysis be reduced to pro forma approval. This should be remedied with an Environmental Impact Report that better organizes information so that analysis of the big project can be complete.

Numerous aspects of environmental impact that arise from such a huge project do not reach adequate analysis. Some of these are concerned with saltwater intrusion and alteration of the water table due to climate change-driven sea level rise and its impacts on surface water, a shallow water table, and the deeper aquifer from which the proposed cannabis factory aims to draw huge amounts of water (although the amount of water to be drawn is a hidden factor as the number of plants to be grown is not revealed), the impacts of atmospheric river storm events on drainage in combination with changes to be expected from rising sea levels, even the number of cannabis plants that will be grown in the almost 800,000 square feet of hoop house is information not provided and thus not adequately analyzed for impact on the environment. What volume of plastic will be waste each year? Where will it be discarded and what impact will the unknown level of waste from the proposed factory have on the environment? Where will 100+ cars park? What impact on air pollution and other environmental impacts can be expected from having this number of cars added to those already bringing commuting workers plus the existing vehicle impacts of the local community which utilize narrow country roads? What impact on air pollution? Far more needs to be known about the proposed factory before mitigations sufficient to the requirements of CEQA can be made adequate. Simply reeling off the names of various regulations set by various agencies and the promise that these will both be applied to the workings of the factory and adequate to the specific conditions of the proposed factory is not enough to satisfy CEQA.

To claim that (from the section on Hazards and Hazardous Materials)

“as part of the proposed cultivation, State of CA approved agricultural chemicals (e.g., PureCrop1, Regalia, Javelin) would be applied to the cannabis plants to control pests and mold. Approved chemicals would be applied at agronomic rates according to manufacturer’s specifications. Consistent with CDFA §8307, for all pesticides that are exempt from registration requirements, cultivation sites must comply with all pesticide laws and regulations enforced by the Department of Pesticide regulation and with the following pesticide application and storage protocols

1. Comply with all pesticide label directions;
2. Store chemicals in a secure building or shed to prevent access by wildlife;
3. Contain any chemical leaks and immediately clean up any spills;
4. Apply the minimum amount of product necessary to control the target pest;
5. Prevent offsite drift;
6. Do not apply pesticides when pollinators are present;

7. Do not allow drift to flowering plants attractive to pollinators;
8. Do not spray directly to surface water or allow pesticide product to drift to surface water. Spray only when wind is blowing away from surface water bodies;
9. Do not apply pesticides when they may reach surface water or groundwater; and
10. Only use properly labeled pesticides. If no label is available consult the Department of Pesticide Regulation.

ALC has considerable experience managing and using fertilizers, pesticides, and other products in existing agricultural operations on the Project Site and adjoining parcels, and has developed detailed Standard Operating Procedures for use and management Arcata Land Company Initial Study 54 December 2020

of pesticides, injury and illness prevention, and waste management. In addition, ALC has developed project-specific waste management and pest management plans, consistent with State of California cultivation licensing requirements. Further, the Project will comply with the CMMLUO performance standards, and the Best Practicable Treatment or Control (BPTC) measures of State Water Resources Control Board (SWRCB) Order WQ 2019-0001-DWQ. The SWRCB program and County ordinance have “standard conditions” applicable to cannabis operations that address impacts from the storage and use of hazardous materials which include the following requirements:

- Any pesticide or herbicide product application be consistent with product labeling and be managed to ensure that they will not enter or be released into surface or groundwater.”

In *CATs v California Department of Food and Agriculture* (re: the Glassy Wing Sharpshooter EIR) the state Court of Appeals decided that citing to the California Department of Pesticide Regulation registration process, the label that flows from that and regulations regarding pesticides does NOT satisfy the requirements of CEQA for adequate analysis. We will assume here that the same is true of citing to other regulations. Simply naming the authority and that the regulation is the mitigation needed to prevent environmental impacts falls far short of the analysis necessary for potentially significant impacts to the environment such as those represented by pesticides.

1. “Comply with all pesticide label directions;” this is not an analysis of the potential impacts of the pesticide. Among the legitimate concerns about these applications is the sheer size of the cannabis factory, a million square feet. No effort was made to quantify the number of cannabis plants that will be grown per hoop house or in total.

When growing a monoculture, pest outbreaks can be severe and overwhelming.[

<https://www.sciencedaily.com/releases/2016/10/161012134054.htm> and William C. Wetzal, Heather M. Kharouba, Moria Robinson, Marcel Holyoak, Richard Karban. **Variability in plant nutrients reduces insect herbivore performance.** *Nature*, 2016; DOI: [10.1038/nature20140](https://doi.org/10.1038/nature20140)]

Pesticide use may be required for every one of the 1,000,000 square feet of the growing space or the crop will be severely reduced or lost. Thus the reaction in the cannabis factory could be an enormous use of a single pesticide. Even if considered minimally toxic, when used in large quantity there is potential for unacceptable levels of toxicity.

For example, PureCrop1 is, according to its website, “Also described as a nano-supramolecular surfactant, nano-sized emulsions offer many advantages over conventional chemicals in safety, sustainable results, more rapid and reliable activation and extended long-term effects.” This description sets off alarms for many who have advanced scientific understanding of nano-supramolecular surfactants as part of the nano-sized movement in agriculture.

“Despite obvious benefits of the power of small materials, there are open questions about how the nanoparticles used for day-to-day life may affect the environment. One of the crucial issues that have to be addressed in the near future, before massive fabrication of nanomaterials, is their toxicity to humans and impact on the environment. There are considerable debates regarding how the novel properties of nanomaterials could lead to adverse biological effects, with the potential to cause toxicity. One needs to understand when nanoparticles undergo biodegradation in the cellular environment, what will the cellular responses be? For example, biodegraded nanoparticles may accumulate within cells and lead to intracellular changes such as disruption of organelle integrity or gene alternations. Some of the crucial questions are: 1) Are nanomaterials more toxic than their non-nano counterparts? 2) Will nanoparticles transform in the environment into more toxic forms? Before nanomaterials are allowed to be used in daily life activities, it is important for nanotoxicology research to uncover and understand how nanomaterials influence the environment so that their undesirable properties can be avoided.” [<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2844666/>]

When used in any quantity in a large monoculture on the edge of town near already established human populations and market farms, as is the proposed cannabis factory, the potential that large amounts of this chemical compound could be used in a space of a few days is of concern. This is just one way the potential for environmental impacts of the cannabis factory is significant enough to warrant the analysis required by CEQA. Nobody in Arcata wants to be a test animal for the nanoparticles of PureCrop1 without at least an idea of what it entails. This is why we have CEQA, to learn in advance the harms posed by an activity the government is permitting, to find mitigations, to limit, to change or to can the proposal based on facts revealed in an adequate analysis. This mitigated negative declaration fails to accomplish that. Though we support using low toxicity pesticides as an alternative to higher impact pesticides, there really is no toxic substance that can be considered safe, especially when used near human and wildlife populations and in quantity.

Regalia, another pesticide mentioned as an example of what will be used at the proposed cannabis factory, has as its active ingredient extract of Giant Knotweed (*Reynoutria sachalinensis*). US EPA has reviewed studies that indicate the plant material may have lower acute impacts

[[https://www3.epa.gov/pesticides/chem\\_search/reg\\_actions/registration/decision\\_PC-055809\\_1-Nov-00.pdf](https://www3.epa.gov/pesticides/chem_search/reg_actions/registration/decision_PC-055809_1-Nov-00.pdf)] “Acute” impacts refer to effects of chemicals that occur immediately or soon after exposure. These effects have not been determined for any of the ingredients of Regalia. Though Giant Knotweed is used as food for many Japanese, its impacts when inhaled are unknown to us as toxicological assessment was not done for the mitigated negative

declaration. US EPA analysis is in laboratory conditions with laboratory animals, not in the particular environment of the Arcata Bottoms.

Though the chemicals mentioned above are considered low toxicity, their use has not been analyzed in weather conditions regularly experienced in the Arcata Bottoms. For example: Fog, a common weather condition of the area where the cannabis factory will be constructed if approved.

"Scientists have found that toxic fog, made up of microscopic water droplets containing unexpectedly high concentrations of pesticides, herbicides and many other chemicals, forms over at least some parts of the United States.

"The scientists say that the fog may be among the causes of a mysterious decline of forests in the United States and Europe. They say that the chemical-laden fog, which was sampled in Beltsville, Md., and in California's San Joaquin Valley, could prove to be more of a health hazard than the air in which the fog forms."

"[<https://www.washingtonpost.com/archive/politics/1987/02/12/toxic-fog-containing-farm-chemicals-may-be-harming-us-forests/48769d42-510f-41aa-b497-dfcfa972b93d/>]

"We have discovered that a variety of pesticides and their toxic alteration products are present in fog, and that they occasionally reach high concentrations relative to reported rainwater concentrations. In our experiments, we were able to measure the air-water distribution coefficients of pesticides between the liquid fog and the interstitial gas phase. These measurements reveal that some chemicals are enriched several thousandfold in the suspended liquid fog droplets compared to equilibrium distributions expected from Henry's Law coefficients for pure aqueous solutions." [<https://www.nature.com/articles/325602a0>]

These simple examples of the potential for toxicity as a result of pesticide use on one million square feet of contained monoculture underscore the need for analysis of pesticide use for the proposed cannabis factory.

We request that the mitigated negative declaration be rejected in favor of either turning down the project or requiring an Environmental Impact Report to adequately make transparent the environmental impacts likely to occur as a result of approving the permit.

Sincerely,

A handwritten signature in cursive script that reads "Patty Clary".

Patty Clary  
Executive Director



Californians for Alternatives to Toxics  
707-834-4833  
patty@alt2tox.org

## Yandell, Rodney

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**From:** SARA MOSHER <smmosher77@gmail.com>  
**Sent:** Friday, February 26, 2021 4:58 PM  
**To:** Yandell, Rodney  
**Subject:** Opposition to Proposed 23 Acre Cannabis Farm

Good Afternoon,

I am writing to express my opposition to the proposed 23 Acre Cannabis Farm in the Arcata Bottoms. This is adjacent to the neighborhood that my family and I live in and to the school that they attend. We are very concerned about a Cannabis Farm this size even being a consideration for Humboldt County. This would negatively impact our neighborhood by diminishing our air quality, increasing the crime rate and adding additional unwanted traffic. Pacific Union School, myself & my neighbors were not notified of this proposal until the article in the Lost Coast came out. I understand that this proposal might meet the legal requirements but this is literally a family neighborhood and my backyard. Please consider the families and neighborhoods affected by a cannabis farm this large being approved.

Thank you,

Sara Mosher

## Yandell, Rodney

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**From:** Courtney Ward <courtney0ward@gmail.com>  
**Sent:** Friday, February 26, 2021 7:17 PM  
**To:** Yandell, Rodney  
**Subject:** Cannabis Proposal

Hello,

I just wanted to voice my concern over the proposed cannabis farm at Sun Valley. I'm in no way opposed to pot farming, but I do feel like Sun Valley has questionable business and environmental practices, and I don't feel like they'd be responsible enough for a large scale cannabis grow. My mother lives down the road, and my son attends Pacific Union School, and there are already issues with pesticide smells and traffic. I'm not sure a marijuana operation would improve the situation. Thank you for your consideration.

Best regards,  
Courtney Ward

## Yandell, Rodney

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**From:** Karie/Chad Kroeker <kariechadkroeker@gmail.com>  
**Sent:** Friday, February 26, 2021 7:38 PM  
**To:** Yandell, Rodney  
**Subject:** Sun Valley Floral Farms and Potential Pot Grow

Hello Mr. Rodney Yandell:

I live at 1956 Ernest Way on the corner of Janes Rd and Ernest in Arcata. While I greatly sympathize with Sun Valley Floral Farms desire to diversify because of dropping flower sales, I do not want my property value to decrease due to their desired change in product. I am also concerned about potential chemical pollution, the smell that cannabis may emit, and the potential for increased criminal activity in my community.

Thank you for your time and attention to this matter.

Sincerely,  
Karie Kroeker  
Chad Kroeker  
Homeowners in impacted area

## Yandell, Rodney

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**From:** Stephanie Gould <stephanie.d.gould@gmail.com>  
**Sent:** Friday, February 26, 2021 8:04 PM  
**To:** Yandell, Rodney  
**Cc:** Josh Gould  
**Subject:** ARCATA LAND COMPANY, LLC COMMERCIAL CANNABIS OUTDOOR LIGHT-DEPRIVATION AND MIXED-LIGHT CULTIVATION PROJECT APPLICATION NO. 12255  
**Attachments:** Arcata Land Company NEG DEC final.docx

Dear Mr. Yarnell,

My name is Stephanie Gould and my family and I live at 2699 Wyatt Lane which is approximately 1,500 feet from the proposed Sun Valley cannabis farm. The proposed project has just come to my attention this week and I was surprised to learn of its existence and that only neighbors within 300 feet were notified. I have concerns about the proximity to our neighborhood and would like to protest the permit.

My husband and I purchased our home in 2015 and we are proud community members. Our neighborhood is an oasis in Arcata and a quiet, safe place for our kids to live and play. I've skimmed through the MND and while some of my concerns are addressed, I still worry.

- 1.) Property value. I imagine property values within a quarter mile of the site will be affected. You will be able to see the farm from the windows of our second story. If there are view obstructions, security risks, odor, and increased traffic then I assume our home value will tank compared to what it would be without the farm.
- 2.) Security. Knowing a cannabis farm is less than a quarter mile from my home with armed guards fuels anxiety. Can my two children play safely outside anymore? Will there be an increase in traffic? Will there be an increase in crime in the neighborhood?
- 3.) Odor. I understand filters will be in place but it is frequently very windy here in the bottoms and I wonder if they will carry odors into the neighborhood. We already deal with the smell of nearby cattle and adding in marijuana odors will make going outside during certain times of the year repulsive.
- 4.) Groundwater leaching and monoculturing. I'm sure our ground water near farms (and the bulb farm) is already impacted by chemicals, pesticides, fecal matter, etc, so to add more potential runoff is concerning. Also this operation will have negative effects of such large scale monoculture to the local ecosystem including soil, air, water, wildlife and residential with irreparable harm to water sources in this region.
- 5.). Integrity of the owner. I have heard Sun Valley pays their workers less than fair wages and takes advantage of undocumented workers. Having a company like this grow into cannabis raises flags that they are just interested in this endeavor to make extreme profits.

I am attaching a letter a neighbor has prepared that was sent to you. The purpose of me attaching is to state my agreement with the points that were made and that I voice the same concerns.

Please do not consider this application and think of the well-being of thousands of Arcata residents. At a minimum, an Environmental Impact Study should be done by a non-biased, independent firm instead of allowing a Mitigated Negative Declaration for a project of this size. There are millions of available acres in the county available for commercial, why do we need one so close to our community? While I support legalization of marijuana, I think large-scale grows are detrimental to the environment and that they don't belong in residential areas.

Sincerely,

Stephanie and Josh Gould

To: Rodney Yandell [ryandell@co.humboldt.ca.gov](mailto:ryandell@co.humboldt.ca.gov)

Humboldt County Planning Department / 3015 H Street / Eureka CA 95501

Project: ARCATA LAND COMPANY, LLC  
COMMERCIAL CANNABIS OUTDOOR LIGHT-DEPRIVATION AND MIXED-LIGHT  
CULTIVATION PROJECT APPLICATION NO. 12255

First, we did not receive notification from the county regarding this project. We live about 800 feet to the east of the project as do our next-door neighbors on both sides. We understand the county is not obligated, under existing policy, to notify residents/owners if they live more than 300 feet from a project. Under this policy, only one residence, AP 507-181-017, would have received notification and curiously, a small number of residents that live over 1,000 feet away from the project did receive notification. This is how we found out about the project as one of those receiving notification was upset about the project and wanted to know how we felt about it. Imagine our shock and dismay at finding out about this in this way less than two weeks before the comment period ended, particularly given the CEQA document is over 1,400 pages long. Considering that this would be the ninth largest industrial grow in the United States and Canada according to data from October 2020 (<https://www.greenhousegrower.com/crops/cannabis/cannabis-top-20-north-americas-largest-commercial-grows>), why would the county not notify the entire surrounding community about a project of this magnitude and neighborhood/community impact?

Second, we dispute the designation of less than Significant with Mitigation for this proposed project based on the reasons detailed in the comments below. Why was this project designated as less than significant with mitigation when there are so many significant impacts? Additionally, there are numerous irregularities and false statements in the INITIAL STUDY AND DRAFT MITIGATED NEGATIVE DECLARATION.

## AESTHETICS

- Page 27 of the INITIAL STUDY AND DRAFT MITIGATED NEGATIVE DECLARATION (ISDMND) discusses the proposed structures and states they are “obscured from view from offsite residences and motorists on both Foster Avenue and 27th Street due to significant existing perimeter vegetation on adjoining parcels.” This is a false statement. There is no existing vegetation along the entire eastern boundary of the parcel and there is a significant visual impact for the neighboring parcels. Why was this not disclosed in the ISDMND? The glare from the proposed 1,014,000 million square feet of plastic hoop houses will be significant and unavoidable. On sunny days the hoop house will reflect the sunlight like a mirror. This will cause an undue visual hardship on the parcels to the east of the project: imagine a 1,014,00 square foot mirror. How does CEQA mitigate for the visual impact and glare along the Eastern boundary of the parcel?
- New lighting at the site is a concern. We have asked the Arcata Land Company to shield their existing security lights that shine into our bedrooms and our living room. To date, Arcata Land Company/Sun Valley Group has not responded to our request. Other neighbors and community members have complained about the lights from the existing greenhouses. The

ISDMND failed to discuss any enforcement actions. How can we be assured that they will be responsive to complaints in the future? What are the enforcement actions if they fail to respond?

- Why is a viewshed analysis missing from the document? When will this be done?

## AGRICULTURE AND FORESTRY RESOURCES

- Page 30 of the ISDMND states that the project: “would not indirectly convert farmland to non-agricultural land or forest land to non-forest land.” This is in direct contradiction to the page 8 ISDMND statement: “In addition to the placement of sand/soil, Site development will include approximately 40,500 square feet of new concrete surfacing, comprised of concrete within the loading zones, walkways around the administration buildings, ADA parking stalls and ramps (12,698 square feet), green waste storage area (9,460 square feet), and walkways between hoops (18,342 square feet).” This is a total of 74,040 SF of concrete (1.7 acres). This is a net loss of agriculture land and definitely has an impact as does the addition of sand to the soil which destroys the tilth (<http://counties.agrilife.org/williamson/files/2014/08/managing-soil-tilth.pdf>) Why is this being allowed? What is the environmental impact of covering 23 acres of agriculture to hoop houses?

## AIR QUALITY

- Due to the strong winds in the Arcata Bottoms (project site), dust plumes are created when the ground is disturbed and the particles are transported downwind. Mitigation must include disturbing soil only during low wind conditions. How can we be assured of this?
- On Page 33 the ISDMND states “With the exception of scattered rural residential, there are no sensitive land uses within the vicinity. The surrounding vicinity is sparsely populated with approximately five residences located within 1,000 feet of the Project Site.” This is false. There are eight residence less than 1,000 feet from Project Site including, at least two of which have residents with severe asthma. It further states: “Mary’s Catholic Church is located >2,000 feet to the southeast” when in fact, it is 1,687 feet. It also states “The City of Arcata School District owns property located a minimum of 600 feet to the east” when it is 564 feet. This school property is currently a Community Supported Agriculture Farm that sells vegetables to our community that are grown using organic techniques. Adjacent to the school district property is a city owned 4 + acre parcel (AP 505-151-009) that is proposed to become a city park. The western boundary to a large residential subdivision is located 1,400 feet to the east of the proposed cannabis project. To the north, there is another large residential neighborhood 2,620 feet away. To the southeast is a large residential neighborhood 2,601 feet away. NOTE: All measurements used above are calculated with the measuring tool on the Humboldt County GIS Web Portal. All properties discussed are downwind of the proposed project and will be affected by odor drift.
- Other sensitive receptors identified in the ISDMND are the planned senior care center and senior housing located on the recently Foster Annex parcel (505 061 011) along with schools and child care centers.

## ODORS

- Page 33 states: “During operation, the cultivation of cannabis is a potential source of odors. The odor of cannabis is described by some as an offensive skunk-like smell. This odor is produced by terpenes, which are volatile, unsaturated hydrocarbons found in the oils of



various plants. Naturally, these oils are most present late in the budding cycle and at harvest. Without proper controls, greenhouse (hoop structure) cultivation can lead to a buildup of these odors because of reduced ventilation, heat and humidity conditions. The closest offsite residences are two homes located on a single parcel off of 27th Street approximately 200 feet to the north and northeast of the Site. Beyond this single parcel, the next closest homes are located >500 feet to the east of the Project Site. Given the limited number of potential receptors, separation distance, and control measures to be implemented through the Conditional Use Permit, the Project is not anticipated to create objectionable odors affecting a substantial number of people and impacts would be less than significant.” The conclusions drawn at the end of this statement are erroneous. There are eight parcels less than 1,000 feet away from the project site and a residential subdivision 1,400 feet from the project site. Many of the owners of these parcels and residences have spent decades developing their homes and properties and take offense at the county’s seeming willingness to sacrifice them for the financial gain of very few. It is our assumption that the hoop houses will have the doors at one end that will be open during the period when the fans are operating and the filtration system is in use. Is this assumption correct? If so, this would allow non-filtered odors to escape, meaning a considerable volume of air containing odors will be transported downwind and affect all the people living downwind. If this is correct, how will this be mitigated?

- Given that the wind at the project site exceeds 10 miles per hours most days (NWS data), the Volatile Organic Compounds (VOCs) venting and escaping from the hoop houses will be transported downwind. These VOC’s are dangerous especially to people that have respiratory illnesses (including at least two people with severe asthma living within 800 feet). <https://www.tandfonline.com/doi/full/10.1080/10962247.2019.1654038> It is doubtful that odors from this enormous grow (23 acres, 1,014,000 sq. ft.) will be adequately mitigated. The mitigation measures in the ISDMND failed to define how the county will quantify the smell when odor complaints are filed. How will the county quantify the odors? What will be the threshold for the number of complaints before the county takes action and what will those actions be? Note: There is a device (the Nasal Ranger) that can quantify the concentration of odors but our county does not have one. Because of the size and unknowns of this cultivation this project needs an EIR. Why has an EIR not been conducted?

## NOISE

- We are very concerned that the project states that noise is a “less than significant impact” given the number of fans that will be in use to ventilate the greenhouses. Winds in the Arcata Bottom transport sound a long distance. For example, we have had to call Sun Valley on numerous occasions to have them turn down the radios that workers are listening to in the fields. How will the noise of the fans be mitigated?

## BIOLOGICAL RESOURCES

- None of the bird species for which foraging habitat exists within the project were detected on the first survey (conducted on May 2, 2019). These potential species are: Cooper's hawk (*Accipiter cooperii*), Sharp-shinned hawk (*Accipiter striatus*), Great egret (*Ardea alba*), Great blue heron (*Ardea herodias*), Short-eared owl (*Asio flammeus*), Vaux's swift (*Chaetura vauxi*), Northern harrier (*Circus cyaneus*), Snowy egret (*Egretta thula*), White-tailed kite (*Elanus leucurus*), Merlin (*Falco columbarius*), American Peregrine falcon (*Falco peregrinus anatum*) and Bryant's Savannah sparrow (*Passerculus sandwichensis alaudinus*).

- Birds species seen on the second survey (conducted on July 19, 2019) were: Common raven (*Corvus corax*), Northern harrier (*Circus cyaneus*), Cedar waxwing (*Bombycilla cedrorum*), Barn swallow (*Hirundo rustica*) and Brown-headed cowbird (*Molothrus ater*).
- Missing from the above lists are Crackling Goose (*Branta hutchinsii*) and Canadian Goose (*Branta canadensis*) which are common during the migration months of January thru April where up to 60,000 can be seen in the Humboldt Bay area. We have observed both of these species in large numbers foraging on the fields of the study area during the winter months. The reason these birds were not detected during the surveys is because the studies were conducted outside the migration period and the fact that the study was only conducted for a few hours on one day May and a second day in June. One of us, James Cotton, is a retired federal wildlife biologist and is very familiar with methodologies involved in conducting field surveys. He finds the bird study performed by SHN to be inadequate due to the small sample size and that they were conducted outside the migration period for the dominate species, in terms of numbers, that uses the site for forage. How can an evaluation for CEQA be made on inadequate and insufficient data?

## Water Source and Irrigation Plan

- One of several major flaws in the ISDMND is the absence of data regarding the number of cannabis plants that will be grown during the months of April thru October. What is the number of plants projected to be grown counting all the rotation plants?  
The 1,014,000 square feet of hoop houses will consume a significant amount of water. According to The Journal of Environmental Management, greenhouse cannabis grows use more water than outdoor cannabis cultivation uses  
<https://www.sciencedirect.com/science/article/pii/S0301479720308847?fbclid=IwAR3jZRnDZb-PxL54lX1eVZz3PAIGl4cGd4YFJTAKqM5qtpP8xF5FzkkejHc> Calculating water usage without knowing the number of plants is inaccurate at best, however, using the model described by 151.org in <https://151farmers.org/wp-content/uploads/2018/07/Greenhouse-Water-Consumption-Table-.pdf?fbclid=IwAR3jZRnDZb-PxL54lX1eVZz3PAIGl4cGd4YFJTAKqM5qtpP8xF5FzkkejHc> and adjusting for number of days, assuming 16 sq ft per plant, and only one harvest (no rotation) per season, the calculated water usage is a very conservative 80-acre feet per year, not 52-acre feet as stated on page 6. We emphasize that the total number of plants to be grown throughout the season must be known in order to determine accurate water usage. Why is the project not required to state the estimated number of plants? Why does CEQA not require this vital piece of information? Why does the county not require it, particularly given climate change and the drought conditions we've dealt with over the past number of years? How was the 52-acre feet of water number estimated without knowing the number of plants to be grown?
- The report does not mention if the wells are dedicated to the hoop houses exclusively or if the water will also be used for other purposes. How will well water consumption be monitored, measured, documented, and reported?
- Will the wells be monitored for toxic chemicals on a regular basis? Who does the monitoring? Where and how will the results be reported and will they be available for the community to see?

- How will the amount of water needed for this project impact neighborhood wells? This is a concern of many in the neighborhood that rely on wells for their water needs. How will this be monitored and mitigated?
- Other topics that were missing in the study are saltwater intrusion and the cumulative impact of other wells in the Arcata Bottom pumping from the aquifer(s). This is a significant omission. Saltwater intrusions have a serious impact on agricultural lands and can cause ecosystems changes that displace plant species. "Seawater intrusion is the movement of seawater into fresh water aquifers due to natural processes or human activities. Seawater intrusion is caused by decreases in groundwater levels or by rises in seawater levels. When you pump out fresh water rapidly, you lower the height of the freshwater in the aquifer forming a cone of depression. The salt water rises 40 feet for every 1 foot of freshwater depression and forms a cone of ascension. Intrusion can affect the quality of water not only at the pumping well sites, but also at other well sites, and undeveloped portions of the aquifer." (<https://www.lenntech.com/groundwater/seawater-intrusions.htm#ixzz6nQIVoThg>) . Sea levels will continue to rise as a result of climate change and will exacerbate saltwater intrusions in coastal areas and impact agriculture lands. During the rapid pumping of wells while performing the cleanup of the toxic chemical pentachlorophenol at the old Simpson Mill (adjacent parcel to the project site) a saltwater intrusion was observed, meaning a mixture of saltwater was pumped to the surface. This layer of saltwater below the fresh water was present at the time of the clean-up and most likely is still present today. If rapid depletion/pumping from the existing aquifer happens again, then mostly likely another saltwater intrusion would occur. Additional studies need to be conducted to determine if the surrounding wells are pumping from the same aquifer/s as that of the wells supplying water to the proposed project site and if so, at what rate, so rapid water drawdown can be avoided. Will these studies be conducted? If so, when? If not, why not?

Sources:

- [https://humboldt看bay.org/sites/humboldt看bay2.org/files/Final\\_HBSLR\\_ConceptualGroundwaterModel\\_141209.pdf](https://humboldt看bay.org/sites/humboldt看bay2.org/files/Final_HBSLR_ConceptualGroundwaterModel_141209.pdf)
- <https://deeply.thenewhumanitarian.org/water/community/2018/05/14/seawater-intrusion-threatens-some-of-californias-richest-farmland>
- <https://www.humboldt看baykeeper.org/climate-change-impacts-sea-level-rise/69-in-the-news/672-rising-seas-pose-risks-around-humboldt-bay>
- <https://www.climatehubs.usda.gov/taxonomy/term/391>
- <https://www.cityofarcata.org/DocumentCenter/View/7193/City-of-Arcata-Sea-Level-Rise-Risk-Assessment-04-2018?bidId=>

## TRAFFIC

- Page 1250 of the study states, "Based on standard ITE rates, the project would be expected to result in 232 new trips per day at peak operation." Foster Avenue will require extensive upgrades, especially the first two corners that are encountered when traveling westward from Alliance Road. These corners, in their present condition, will not allow two semi-trucks, traveling in opposite directions, to negotiate the turns simultaneously. Additionally, the sightline on the second corner of Foster Ave. heading westward from Alliance Road is very limited and, in my opinion, is a safety hazard, needs further study. Will this receive further study? If not, why not?

- Page 1282 states: “Based on standard ITE rates, the proposed project would be expected to result in 232 new trips per day at peak operation.” Do we understand correctly that, including the new trips and accounting for the other existing and pending permits that will be using Foster Avenue, the number of trips on Foster Avenue will be in excess of 900 trips beyond the current normal traffic flow? If not, what are the number of trips when including the existing traffic and pending permits?
- To mitigate the number of trips on Foster Avenue, Arcata Land Company could transport workers to and from work to a transportation hub or to housing they currently own. Sun Valley Farms is currently transporting some of their worker to and from company owned houses on 27<sup>th</sup> Street and other locations using their vans, this is model could be implemented by the Arcata Land Company.

#### OTHER CONCERNS

- Due to the proximity of the cannabis grow (800 feet), our property values, along with many of those in the neighborhood, will likely be significantly reduced as will the number of potential buyers. Local realtor Richard Dorn told us “living close to a Cannabis grow of this size will have a significant impact due to limiting the numbers of buyers.” A Sacramento Bee article from 9/17/17 titled “If a marijuana grow warehouse opens nearby, will your home value suffer?” (link <https://amp.sacbee.com/news/business/real-estate-news/article173621656.html>) shows that property values can suffer How will the potential impact on property values not be addressed?
- The report fails to adequately address the potential for increased crime. Given the high monetary value of cannabis, this is a concern of many in the community. The study states that there will be security but what does this look like? How will this affect the neighborhood? Will there be armed guards? Guard dogs?



Mrs. Rebecca Crow  
1835 Roberts Way  
Arcata, CA 95521  
707-497-9294

February 26, 2021

Rodney Yandell, Humboldt County Planning Department  
3015 H Street  
Eureka CA 95501  
SENT VIA EMAIL TO: [ryandell@co.humboldt.ca.gov](mailto:ryandell@co.humboldt.ca.gov)

RE: ARCATA LAND COMPANY, LLC COMMERCIAL CANNABIS OUTDOOR LIGHT-DEPRIVATION AND MIXED-LIGHT CULTIVATION PROJECT APPLICATION NO. 12255

Dear Mr. Yandell:

This letter is to provide comments on the proposed Commercial Cannabis Outdoor Light Deprivation and Mixed-Light Cultivation Project (Project) California Environmental Quality Act (CEQA) Initial Study and Mitigated Negative Declaration (IS/ MND) circulated by the County of Humboldt as the Lead agency. The proposed 22.9 acre commercial cannabis cultivation facility is proposed on a property located between 27th Street and Foster Avenue, west of the City of Arcata.

I am a resident of the City of Arcata, and have lived at 1835 Roberts Way approximately 1,700 feet from the proposed Project site for the last 17 years. Our neighborhood is peaceful and folks enjoy access to the nearby City owned park parcel less than a 1,000 feet from the proposed Project Site. Many community members also use the park parcel to walk their dogs and enjoy a quiet sunset.

#### **Inadequate Identification of Significant Effects**

The County of Humboldt as Lead Agency for the IS/ MND did not adequately identify significant impacts related to Air Quality and Agricultural Resources. As further presented below, the Project as proposed has potentially significant impacts, which necessitate that the County complete an Environmental Impact Report (EIR).

#### **Inadequate Notification of Potentially Affected Parcels**

As a resident of a single family home in a residential subdivision less than ½ mile from the proposed Project, which has significant odor and noise impacts to residences, a notice of the circulation of the CEQA document should have been sent to my address, and that of my nearby neighbors. While county is not obligated, under existing policy, to notify residents/owners if they live more than 300 feet from a project. The fact that residents will be affected by permanent significant impacts should have been considered in the public notification process. The lack of notification resulted in my only having one day to digest and respond to a 1,400 page document.

**Lack of identification of Significant Impact on Air Quality/Exposure of sensitive receptors to substantial pollutant concentrations**

A EIR should have been prepared for this project due to the unavoidable impacts to air quality on sensitive receptors from the odor of Cannabis.

As presented in the IS/MND "A sensitive receptor is a person who is particularly susceptible to health effects due to exposure to an air contaminant. Land uses considered sensitive receptors include residences, schools, playgrounds, childcare centers, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. With the exception of scattered rural residential, there are no sensitive land uses within the vicinity. The surrounding vicinity is sparsely populated with approximately five residences located within 1,000 feet of the Project Site."

The statement that there are no sensitive land uses within the vicinity of the project, except scattered rural residential is false. There is a population of 900 people within only a ½ mile of the proposed Project site including sensitive receptors of 165 Youth and 53 Seniors, according to California State Parks Community Fact Finder (See Attachment 1 for data print out). Of this population 367 live in poverty, with a median household income in the ½ mile radius of the proposed Project Site of only 55% of the statewide median household income. Location of the proposed project would further expose this vulnerable population to toxic odors.

Additionally, there is a community park located at APN 505-151-009 less than a 1,000 feet from the proposed Project site where community members outside the neighborhood come to walk their dogs. There is a playground on this parcel approximately 1,500 feet from the proposed Project site. Lastly, there is an elementary school site (Fuente Nueva Charter School on the St. Mary's Campus) located approximately 2,000 feet from the proposed Project Site. Another sensitive receptor identified in the IS/MND is the planned senior care center and senior housing located on the recent Foster Annex parcel (505 061 011). All properties discussed are downwind at times of the proposed Project and will be affected by odor drift.

According to the Arcata Land Company Cultivation Project Air Quality and Greenhouse Gas Emission Assessment, September 25, 2020 (2020 Air Quality Study), attached to the MND the following standard from the updated Humboldt County General Plan applies to this project:

*AQ-S4 Buffering Land Uses. When considering buffers between new commercial and industrial sources of emissions and adjacent land uses follow the California Air Resources Board's Air Quality and Land Use Handbook: A Community Health Perspective (CA ARB Community Handbook) and NCUAQMD Recommendations.*

According to the CA ARB Handbook, odors can cause health symptoms such as nausea and headache. Because of the subjective nature of an individual's sensitivity to a particular type of odor, there is no specific rule for assigning appropriate separations from odor sources. Under the right meteorological conditions, some odors may still be offensive several miles from the source. Given that the wind at the project site exceeds 10 miles per hours most days (NWS data), it is reasonable to assume these odors will travel. The CA ARB Handbook considers environmental justice concerns as part of the ARB's regulatory programs to reduce air pollutant emissions. As presented above the residential areas

bordering the proposed Project have high poverty rates and low median household incomes, and placing a new odor emission source will continue the negative impacts of poor air quality on disadvantaged community members.

The 2020 Air Quality Study states the odor of cannabis could be described by some as an offensive skunk-like smell. This odor is produced by terpenes, which are volatile unsaturated hydrocarbons found in the oils of various plants. Generally, the larger the size of the canopy area, the greater the potential for odor to be evident to off-site receptors. Proposed controls are to ventilate greenhouse exhaust air through activated carbon filters that are changed on a regular basis, which meets Humboldt County ordinance 2559 requirements for cannabis cultivation. Further, additional measures are proposed if the carbon filtration does not work, but no data is provided to show that either method will result in the necessary reductions in odors to avoid impacts to sensitive receptors.

The conclusion of the 2020 Air Quality Study was that "Operation of the project would result in odor impacts, but they can be managed using required odor control, setbacks, and implementation of an odor control plan." Further, the Humboldt County Commercial Cannabis DEIR found that cannabis-related odors would result in a significant and unavoidable impact, despite the use of setback, odor prevention equipment, and prohibition on burning plant materials.

While a mitigation measure is provided to manage odors, there will still be a significant impact to sensitive receptors in the project areas, and an EIR should have been completed to address this issue. The IS/MND did not provide a copy of the Odor Control Plan that would be implemented as part of proposed Mitigation Measure AQ-1 to address odor issues, and thus there can be no assurance that odors can or will be managed. In addition, the Operation Plan that was provided does not include mention of preparation of an Odor Control Plan.

While the IS/MND claims that the Project would not produce significant quantities of criteria pollutants during construction or operation. It does clearly state in the supporting documents that there will be an unavoidable odor impact. The IS/ MND also states "As a result, the Project would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant."

The Project does result in the exposure of sensitive receptors to substantial pollutant concentrations, and thus impacts are not less than significant, and should be categorized as significant and unavoidable. Specifically at my home I have a child with severe medically documented headache disorder. The odor of cannabis triggers her headaches, causing pain, stress, and mental discomfort.

#### **Lack of identification of Significant Impact on Aesthetics without Mitigation**

The IS/MND states that aesthetic impacts are less than significant in regards to degrading the visual character or quality of public views of the site and its surroundings as well as for creating a new source of substantial light or glare.

It states the proposed structures are "obscured from view from offsite residences and motorists on both Foster Avenue and 27th Street due to significant existing perimeter vegetation on adjoining parcels." There is no existing vegetation along the entire eastern boundary of the parcel and there is

a significant visual impact for the neighboring parcels. No viewshed analysis was completed with the IS/ MND, and thus additional work is necessary to confirm the statement regarding no visual impacts.

While the IS/ MND includes some mention of issues related to nighttime light operations and greenhouse glare, specific mitigation measures should be included to mitigation for possible impacts. The operation plan alone does not provide enough assurances that the proposed Project will abide by specific light and glare restrictions. The Arcata Land Company has not acted to shield their existing security lights that shine into nearby residences, nor responded to community members complaints about the lights from the existing greenhouses.

#### **Lack of Identification of Significant Agricultural Impacts.**

The IS/MND states that the project: “would not indirectly convert farmland to non-agricultural land or forest land to non-forest land.” However, page 8 of the IS/MND states “In addition to the placement of sand/soil, Site development will include approximately 40,500 square feet of new concrete surfacing, comprised of concrete within the loading zones, walkways around the administration buildings, ADA parking stalls and ramps (12,698 square feet), green waste storage area (9,460 square feet), and walkways between hoops (18,342 square feet).” This is a total of 74,040 SF of concrete (1.7acres), or conversion of 7.4% of the site to non-agricultural use. This is a net loss of prime agriculture land as years of compaction under concrete and loading trucks will reduce fertility. In addition, much of the proposed conversion is for manufacturing type operations as opposed to simple agricultural. An EIR is required to adequately evaluate alternatives to the proposed permanent conversion of prime agricultural land.

#### **Lack of Identification of Significant Noise Impacts**

The currently proposed control to try and minimize odors is to ventilate greenhouse exhaust air through activated carbon filters. It is assumed that this ventilation will be required 24 hours a day to avoid the toxic build up of violatate fumes in the greenhouses, but it is not stated in the IS/ MND. Winds in the Arcata Bottom transport sound a long distance. Residents enjoy the peaceful sounds of nature in the evening and on quiet nights people can hear the ocean. The IS/ MND again incorrectly states that the surrounding vicinity is sparsely populated. A major subdivision is located within 1,500 feet of the proposed Project site.

The new will facility will create a permanent significant increase in ambient noise levels with machine sound form the exhaust fans, that is not addressed in the IS/MND. No mitigations are proposed for noise impacts. An EIR is required to evaluate alternatives that would not result in permanent significant impacts.



## Summary

The County of Humboldt should re-evaluate the process by which it was determined that a Mitigated Negative Declaration was the appropriate CEQA document for the proposed Project, and move forward with the preparation of a Full Environmental Impact Report to analyze alternatives that may reduce impacts to less than significant. As the IS/ MND stand, it does not accurately reflect the significance of impacts on the environment.

Please add my name to the list of interested parties for this project and include me in all notifications moving forward regarding this project.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Rebecca Crow', with a long horizontal flourish extending to the right.

Rebecca Crow  
707-497-9294  
[Watergirl64@gmail.com](mailto:Watergirl64@gmail.com)

CC: Mike Wilson, Humboldt County 3rd District Supervisor 825 5th Street, Room 111  
Eureka, CA 95501 (sent via email [mike.wilson@co.humboldt.ca.us](mailto:mike.wilson@co.humboldt.ca.us))

# California State Parks Community FactFinder Report

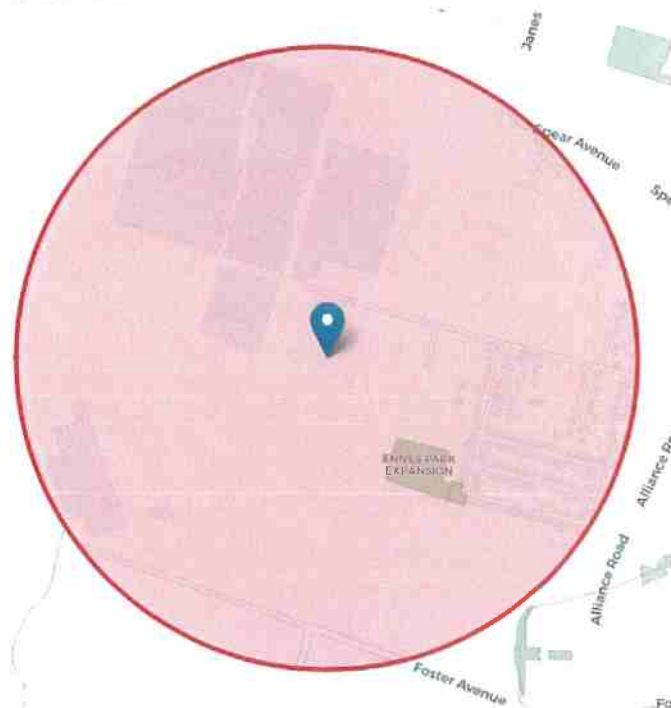
Project ID: 102219  
Coordinates: 40.8873, -124.1000  
Date: 2/26/2021

This is your project report for the site you have defined. Please refer to your **Project ID** above in any future communications about the project.

## PROJECT AREA STATISTICS

County	Humboldt
City	Unincorporated
Total Population	901
Youth Population	165
Senior Population	52
Households Without Access to a Car	11
Number of People in Poverty	367
Median Household Income	\$38,177
Per Capita Income	\$19,574
Park Acres	4.69
Park Acres per 1,000 Residents	5.20

## PROJECT AREA MAP



## REPORT BACKGROUND

The project statistics have been calculated based on half mile radius around the point location selected. Only park acres within the project area's half mile radius are reported.

Population and people in poverty are calculated by determining the percent of any census block-groups that intersect with the project area. The project area is then assigned the sum of all the census block-group portions. An equal distribution in census block-groups is assumed. Rural areas are calculated at a census block level to improve results.

Median household and per capita income are calculated as a weighted average of the census block- group values that fall within the project area.

More information on the calculations is available on the methods page.

**Demographics**—American Community Survey (ACS) 5-year estimates 2014-2018; Decennial 2010 Census; the margin of error (MOE) was not analyzed.

**Parks**—California Protected Areas Database 2020a CFF adjusted (6/2020) - more information at <http://www.CALands.org>. Parks and park acres area based on best available source information but may not always contain exact boundaries or all parks in specific locations. Parks are defined further in the 2015 SCORP (pg. 4).

Users can send updated information on parks to [SCORP@parks.ca.gov](mailto:SCORP@parks.ca.gov)



SCORP Community FactFinder is a service of the  
California Department of Parks and Recreation  
[www.parks.ca.gov](http://www.parks.ca.gov)

SCORP Community FactFinder created by  
GreenInfo Network [www.greeninfo.org](http://www.greeninfo.org)  
in consultation with CA Dept. of Parks and Rec



## **Yandell, Rodney**

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**From:** David Fraga <d.fraga2@aol.com>  
**Sent:** Saturday, February 27, 2021 12:59 PM  
**To:** Yandell, Rodney  
**Subject:** sun valley

i am against it they will start small and then expand. it is right next to st. mary's school and pacific union school and neighborhoods. I have a friend who live by the glendale grow by sundberg and he says the smell is terrible. Crime will increase and property values will decline.

David Fraga  
d.fraga2@aol.com

## Yandell, Rodney

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**From:** Rhonda Ballance <ballance.rhonda@gmail.com>  
**Sent:** Saturday, February 27, 2021 1:45 PM  
**To:** Yandell, Rodney  
**Subject:** Sun Valley mega grow

Mr. Yandell- I have previously written to you my thoughts on opposing the Sun Valley grow in it's entirely and encourage you to really take to heart what is happening here. It's a steamroll regardless of our opportunity as a community to be able to voice our concerns by March 10 for the March 17 zoom meeting. Our precious Humboldt is just being raped please pardon the horrible term but it feels that is what is happening with the county and Sun Valley. Attached is an article regarding what happened in Santa Barbara. Yes Lake County and Salinas have also been impacted this way. We were supposed to be special here in Humboldt. Many have not liked the former illicit pot scene but it is a big part of the history and growth here and was even a way that fire departments and schools were started and supported in the southern region. Those mom and pop farms are now legal having and continuing to go through a painstaking process and they continue to support the county, local community, businesses, and families. The Sun Valley mega grow will do none of that and in fact it will only adversely impact our area. Deep down you know this. I am sick in thinking about this proposal, I'm saddened for the immediate neighbors, our city, and the entire county. I'm alarmed and horrified that the county planners are letting this happen and the lack of true integrity in all of it. Please do the right thing. This mega grow proposal is not that in any way shape or form.

-Rhonda Ballance  
Arcata, CA

<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.latimes.com%2Flocal%2Fcalifornia%2Fflame-santa-barbara-pot-grows-20190612-htmlstory.html&data=04%7C01%7Cryandell%40co.humboldt.ca.us%7C09480e5a24cd4d5d9bba08d8db68e1bb%7Cc00ae2b64fe844f198637b1adf4b27cb%7C0%7C0%7C637500590804890559%7CUnknown%7CTWFpbGZsb3d8eyJWljoIMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Iik1haWwiLCJXVCI6Mn0%3D%7C1000&sdata=plpLrmpTwtkQwL1nRLKIJ2S%2BChfGv8P4a6aX5mToiGI%3D&reserved=0>

## Yandell, Rodney

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**From:** Ford, John  
**Sent:** Monday, March 01, 2021 10:42 AM  
**To:** Yandell, Rodney  
**Subject:** FW: Arcata Land Company Proposed 23 A Project



John H. Ford  
Director  
[Planning and Building Department](#)  
707.268.3738

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**From:** Jeff and Marisa St John <[upperredwoodcreek@gmail.com](mailto:upperredwoodcreek@gmail.com)>  
**Sent:** Friday, February 26, 2021 4:00 PM  
**To:** Ford, John <[JFord@co.humboldt.ca.us](mailto:JFord@co.humboldt.ca.us)>  
**Subject:** Fwd: Arcata Land Company Proposed 23 A Project

Forwarding to you since planner email bounced and person not listed in directory

----- Forwarded message -----

**From:** Jeff and Marisa St John <[upperredwoodcreek@gmail.com](mailto:upperredwoodcreek@gmail.com)>  
**Date:** Friday, February 26, 2021  
**Subject:** Arcata Land Company Proposed 23 A Project  
**To:** [ryandell@co.humboldt.ca.gov](mailto:ryandell@co.humboldt.ca.gov)

Hello.

This project probably needs further investigation (cannibus is not the primary concern).

Public Notice - Yes, County follows the law, but not the spirit of this. Example: Titlow Hill Proposed Subdivision and Rezoning (still open and only reason that some neighbors found out was a random search of County website).

Environmental (water, flora, fauna) is a concern. Would local, state, and federal agencies agree with the information already provided?

Cumulative effect of all aspects of the project.

Benefit to the County. Lost Coast Outpost interview with project applicant already stated that wage and health costs were already an issue with his floral industry and made no statement how growing/processing cannibus would make a difference nor how his current green houses wouldn't be repurposed.

Note: This concern was only brought to light within the last couple of days. Citations and additional could follow.

Regards,

Marisa Darpino (St John)  
District 5

## Yandell, Rodney

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**From:** Ford, John  
**Sent:** Monday, March 01, 2021 11:11 AM  
**To:** Yandell, Rodney  
**Subject:** FW: Sun Valley Cannabis Cultivation



John H. Ford  
Director  
[Planning and Building Department](mailto:John.H.Ford@co.humboldt.ca.us)  
707.268.3738

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**From:** Wilson, Mike <Mike.Wilson@co.humboldt.ca.us>  
**Sent:** Friday, February 26, 2021 3:30 PM  
**To:** Ford, John <JFord@co.humboldt.ca.us>  
**Subject:** Fwd: Sun Valley Cannabis Cultivation

For the record.

Mike Wilson P.E.  
Humboldt County Supervisor, District 3  
707.476.2393

Sent from my iPad

Begin forwarded message:

**From:** Dawn Mcguire <[dawnjhill@aol.com](mailto:dawnjhill@aol.com)>  
**Date:** February 26, 2021 at 9:23:39 AM PST  
**To:** "Wilson, Mike" <[Mike.Wilson@co.humboldt.ca.us](mailto:Mike.Wilson@co.humboldt.ca.us)>  
**Subject:** Sun Valley Cannabis Cultivation

Hello Mr. Wilson:

The project needs a full Environmental study. The bottoms is a sensitive area where we attempt to grow feed for out animals. We have many different species of birds which are seasonal, so there should be a bird survey that spans at least one year to obtain a baseline.

I object to the plans for a million sq feet of cannabis cultivation in my back yard. I live on 11 acres adjacent to the Sun Valley Bulb Farm and have had problems with air pollution directly from the bulb farm. My air has been filled with nauseous gases during the summer. This has led me to believer the bulb farm is not being adequately monitored.

My fields and surrounding farms were formerly leased by the bulb farm and destroyed. It is taking years for these field to recuperate from the bulb farm's mismanagement of the soils.

Furthermore, I do not see why the bulb farm is outside the coastal zone. The boundaries appear to be drawn in a political fashion and that should be reviewed as well with respect to the proposed cannabis cultivation.

Thank you

Dawn McGuire, Democrat

I vote for you