

January 17, 2023

RE: PLN-2021-17384

Dear County Representatives:

Thank you for this opportunity to provide input regarding PLN-2021-17384, appeal of Cisco Farms in Petrolia. I was born and raised in Humboldt County, fourth generation in this county. I've been legitimately self-employed for over two decades (horse shoer and then contractor, all non-cannabis). I've been a permanent resident of the Mattole Valley for almost fourteen years; I own some land here. I'm taking the time to comment today because I am seriously concerned about the future of my community.

I've known Cisco Benemann since I was six years old; we served together in FFA in high school. He's been a lifetime resident of the Petrolia area and never caused conflict or violence against anyone. He's a quiet neighbor and a good friend.

Through the years, more and more people have immigrated to Petrolia. Sadly, today, the community is broken. People and groups constantly seem to complain about what others are doing. The last three sizeable cannabis farms here have been harassed and subject to public criticism. In each case, these are local people trying to make a legitimate living, following all the laws, tirelessly complying with every new regulation, striving to support their families and provide jobs for their communities in one of the most economically challenging situations in decades. Not long ago, there were two restaurants, a vineyard, a coffee company. Now, there's just the general store and it's not busy. Enrollment in the school continues to plunge. We need to generate tax revenue for our basic needs and infrastructure like the volunteer fire department, roads, school. As I said, the community is broken.

Last time I checked, this was still a free country. No person or group should be able to stop another from lawfully farming their own land. Cisco is following the laws. He's complying with every requirement. He's abiding by the rules set by his representative government. It is egregiously offensive and tyrannical for private individuals to stop him from doing what their own government permits him to do on his own property. He's following the rules their own democratically-elected government made. They have no right to stop him.

If you allow special interest groups and individuals with private agendas to stop your constituents from making a living while following your laws, you will set a toxic precedent that will poison the whole area, at a time when the valley needs economic development more than ever. Please know that I am by no means alone in this opinion; many of us feel this way.

In my opinion, these newer residents who like to complain need to learn to embrace tolerance and work with their neighbors rather than running to their soapboxes. These people are suffering from first world problems and the hypocrisy

is beyond belief. Cisco's property qualified for the permit he was issued. Those parameters were set by the county of Humboldt. He has done nothing wrong. He's tried his best to work with the community at every level and address their concerns (social media, individual contacts, in person meetings etc.). The truth is, he's battling arrogance, intolerance, and some people with emotional issues. They're more of a problem for the community than any cannabis farm.

The County government already voted unanimously 5:5 to grant this permit. The facts have not changed since then. If the permit is revoked or altered now in response to this last-minute, groundless appeal, an insidious, dangerous precedent will be set. The best course in this situation is to show true leadership: Stand behind your original decision and do not let yourselves be bullied.

Thank you for your consideration.

Respectfully,

Patrick Queen

**From:** Jane Lapiner <janelapiner@gmail.com>  
**Sent:** Tuesday, January 17, 2023 11:59 AM  
**To:** COB  
**Subject:** Cisco Farms Inc., record #PLN-2021-17384

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

Dear Supervisors, I am writing to oppose the proposed permit for Cisco Farms Inc., record #PLN-2021-17384, on Chambers Road in Petrolia.

There are many reasons to oppose this plan, among them:

1. The amount of heavy traffic that would be going down Chambers Road would be go directly past our grammar school and high school. Besides going past the school it would go past children and adults on bicycles and on foot as they travel to school or to visit friends. This would create a potentially hazardous situation.
2. The amount of water that will be required for this project is astronomical, in my opinion (as are other permitted grows in Petrolia). And, even if the water were only catchment, I believe that we will STILL be depriving the ground, the creeks, the fish and the neighbors of sufficient water to thrive and survive. Also, some years back, the Department of Fish and Game spent somewhere around a half million dollars on East Mill Creek, adjacent to the proposed grow, to repair fish passage to one of the few remaining steelhead runs in the lower River. That would likely be harmed by this project.
3. Light and sound pollution to the neighborhood.

Please deny this plan as it is too big, too polluting and of a scale that promises to harm the social and ecological fabric in Petrolia.

Thank you for your consideration. I am hopeful that you will do the right thing and save Petrolia from additional danger.

Sincerely,  
Jane Lapiner  
Petrolia resident since 1974

**From:** Jessica Brown <jess.cath@gmail.com>  
**Sent:** Tuesday, January 17, 2023 12:00 PM  
**To:** COB  
**Subject:** Cisco Farms Inc. PLN-2021-17384 Negative Declaration

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

Dear Rex, Steve, Natalie, Mike, and Michelle,

I am writing today to voice my concerns regarding the Industrial Grow on Chambers Road by Cisco Farms Inc. Record # PLN-2021-17384.

I am a resident of Chambers Road, new homeowner, small business owner, new mother, and community member of Petrolia. I write today to discuss my opposition to the proposed industrial cannabis operation across the road from my home on Chambers Road.

This location is a neighborhood, not a industrial agriculture zone. I walk this road every day with my now 4.5 month old baby. Not worrying about traffic zipping around the blind corners because it is a small neighborhood in a very rural, remote place. A place for homes, families, the simple joys of rural living. If this proposal went through, 34 new cars (maybe more) would be driving Chambers Road, to and fro, every single day peak season. First of all, have you seen our road? It is degrading at the speed of light, and not getting fixed by you, the county, as much as it should be. Ditches have not been dug by the county in many years and every storm continues to carve the asphalt, narrowing the road to one lane at many places. Have you seen our bridge? It's narrow, old, doesn't seem ideal for supporting the millions of dollars of infrastructure on flat beds it would take to build said operation.

If you are heading North on Mattole Road and need to get onto Chambers, you will be taking a right hand turn straight into the crosswalk of Mattole Unified School, our Preschool-12th grade school. This is a very blind turn, straight into where the kids get dropped off and picked up twice a day. New drivers who do not know this place, and high traffic makes for a situation unsafe to anyone, especially children. Let's continue down Chambers Road. At the very East end of the school, in the Wintertime, you are met with two lakes which narrow the road into half of a lane. Many school children live on Chambers Road, and walk or ride their bikes home through these narrow spaces. As we continue heading East we pass a large Eucalyptus forest (our largest fire hazard), and head into a very steep blind curve which takes you onto the single lane small flat bed bridge and up into another very steep blind curve. All of which Cisco's 30 workers and truckloads of infrastructure would be driving daily and continuing to degrade.

What sort of support will we have in the wildfire season? An impending reality we are facing each and every year. We are dependent upon our Petrolia Volunteer Fire Department, a cohort of beautiful community members, small but mighty. Our volunteers average at about a dozen and only have access to one 2,000 gallon water tender, two Type-3 engines, a Type-1 engine, an ambulance-tip medical rescue, and an ATV with a winch and side by side set up for medical rescue. Chambers Road has many threats in wildfire season. The massive Eucalyptus grove which I spoke of above. Did you know eucalyptus is highly flammable and emits an oil that once burning ignites things quicker and hotter. Chambers Road is my neighbors and my exit plan. It is our way out of a wildfire.

This industrial grow would degrade the quality of life that the people of Chambers Road invested in when they bought their land. Not only would it degrade the humans quality of life, but what about the animals. Mixed lighting and fans are no joke. The sound from Cisco's grow on the other side of our property (that's right, if you allowed this new one of Cisco's we would be entirely surrounded by his grows) sound like the 405 freeway at night. This is affecting the owls, birds, wildlife, etc of this incredibly wild place. I already know many friends and community members who are moving

because of mega grows you have approved. What will be left of this majestic Lost Coast once you approve more and more? Nothing but plastic greenhouses, fans, plastic grow bags, and a town that once was.

I urge you to listen to the members of Petrolia who are writing in, I know there are many of them. Please listen to our worries. Please keep industrial weed grows out of our neighborhoods and in industrial deemed spaces.

Jessica Brown

**From:** River Walker <riverwalker1111@gmail.com>  
**Sent:** Tuesday, January 17, 2023 12:01 PM  
**To:** COB  
**Subject:** PLN-2021-17384 1/24/23 River Walker

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

To the Humboldt County Board of Supervisors,

I'm writing to voice my dissent for the Planning Department's decision to approve the Cisco Farms industrial cannabis operation near downtown Petrolia.

The proposal dwarfs everything else cannabis related in the lower mattole, and will disproportionately affect all who live here. We are a community proud of our natural landscapes and encouraging of post-cannabis options for income and lifestyle. We see each year more growers decide the industry is no longer profitable, and leave their greenhouses empty or their crops standing and left to mold. Each year we see a permit for something bigger approved, so more greenhouses and permanent infrastructure can be shipped out to our pastoral homes and play the odds against a forever plummeting bottom line. It is to the detriment of the community that small grows are dying off and the emergence of singular mega-grows are taking over. Please consider the people who call this beautiful slice of rural Humboldt County home, and how operations like this affect us.

-Traffic: Chambers Rd is a skinny and crumbling residential road that has multiple one lane sections and long stretches where one or both vehicles proceed off-road on the shoulders to pass. The one lane bridge is approached by speed inducing downhill blind corners from both sides. The ditches were abandoned from their regularly scheduled maintenance 5 years ago and now water runs freely on the road when it rains, furthering erosion.

Still, pedestrians enjoy the low and slow traffic and trust they know the neighbor driving to be aware. School children walk it both inside and out of school hours. Livestock and dogs roam. The 54 extra vehicle trips daily, 7 days a week, will more than triple the traffic for our home and neighbors, and during the 5 year process of buildout will clog our road with roaring and rattling heavy vehicle traffic. Page 93 of the mitigation report quotes a standard set by the state that "projects that generate or attract fewer than 110 trips per day generally may be assumed to cause less-than significant transportation impact". That number is arbitrary and in a neighborhood of this size, with this road, is a gross overestimation how much vehicular nuisance is acceptable.

-Infrastructure Impact: The grading, rocking, and construction will be heard throughout Chambers rd, and is expected to be 10 weeks out of each year, for 5 years. This seems like quite an underestimate of time and will not likely be monitored or enforced. The well (or wells) that was drilled last year on the proposed site made going outside a headache, potentially the property location set at the base of a hillside sends out sound more dramatically. Potentially it's that the prevailing wind comes directly from that property. This work is set to be 587 feet from a front door that until now has had unmarred natural vistas.

-Misleading Estimates: The estimates for max capacity labor appears quite optimistic, and anyone who has worked in cannabis would say that only 3 months a year is an underestimation for cannabis leafing, harvesting, processing, and planting again. Even with the quoted 12 hrs a day/7 days a week employee schedule.

-Power: If PG&E is able somehow to fulfill the upgraded drop, the farm is still at the whims of one of the most unreliable grids anyone could imagine. We don't keep track of outages like we do rain, but with the high winds, unstable landscape, and summer auto-shutoffs, it feels like our power is off at least one day out every week. This summer I remember 5 outages in as many days.

-Comparable Grows Nearby: Cisco Farms will be larger than all 12 of the farms in the 1 mile radius, one of which is already Cisco's. These farms are not doing well, and are not comparable to the proposed project. They are all downsizing or not growing, and the recent storm has unveiled just what a mess these scenes are left like when tucked out of sight of the public.


-Enforcement: There is no code enforcement here and mitigations are seemingly rarely followed, so the Negative Declaration does not hold.

-Property Values: A grow of this scale degrades all adjoining property values, and consequently diminishes Petrolia property values and quality of life as a whole. No-one who is not a large-scale grower would want to live next to a grow of this size, and it is devastating to land-owners who invested everything they had to live in nature in this beautiful small neighborhood.

Petrolia and the Lost Coast has so much to offer Humboldt County and the world, and cannabis grows of this size and type hinder progress toward a better future here. Please consider how our natural beauty can benefit local tourism and how the remote landscape can be capitalized on without misplaced industrialization.

As a fellow concerned neighbor stated, the Mattole is worth more than their money. Thanks for your consideration.

-River Walker

  
petrolia ca 95558

**From:** Dan B <calcoastal2@gmail.com>  
**Sent:** Tuesday, January 17, 2023 12:06 PM  
**To:** COB; Bohn, Rex; Madrone, Steve; Arroyo, Natalie; Bushnell, Michelle; Wilson, Mike  
**Subject:** Appeal of Cisco Farms PLN-2021-17384

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Dear Supervisors,

After examining all of the many concerns presented by the residents of the Mattole I hope you will deny this project. As a property owner on Chambers Road I have experienced the destruction and degradation brought to our neighborhood by large cannabis grows.

I, and others not dependent on income from cannabis, are relieved that the 'green rush' is over and a more diverse and normal economy is taking its place.

I ask you to imagine what it is like to invest a lifetime of savings into a beautiful rural retirement property. And then suffer, as investors who live elsewhere, install acres of plastic for you to view, create constant truck and vehicle traffic, light up the night sky, and run industrial fans and generators, audible constantly, day and night.

To add injury to the environmental insults, residences in the area lose value due to industrial grows, if they are saleable at all.

The economies of scale necessary to make cannabis viable in the legal market have no place in the remote Mattole Valley.

Please spare us from this ill conceived project.

Thank you for your consideration,

Dan Berger    Owner    [REDACTED] Chambers Road, Petrolia, California



Dear Humboldt County Supervisors,

I want to address the bullet points as best I can regarding Cisco Farms in Petrolia.

My parents were living in Petrolia when I was born in December 24 1976. I grew up in Petrolia until 1984 when my parents moved to Ferndale and opened a bookstore. We have always maintained our home in Petrolia and I have spent as much of my time there working, exploring, and being a member of that community. My father and I spent many fond years riding horses around Petrolia and along the Lost Coast. I love Petrolia the community and the Mattole River.

I went to Ferndale elementary, Ferndale high school, College of the Redwoods, and "Humboldt State University" Cal Poly Humboldt where I majored in Environmental science emphasis in Water Policy and Management. While living working and commuting much of that time from my home in Petrolia.

I've worked with the Mattole Restoration Council on projects. I've worked for the Mattole Salmon Group during college and after. During that time I've explored almost every single tributary from the headwaters in Whitehorn to the estuary at the mouth of the Mattole river. I've been asked many times to be a board member of the Salmon Group and I'm sure I will someday when the demands of the rest of my life allow for it.

I currently live half time in Petrolia and half in Trinidad with my wife and two daughters. I have a construction company and a cannabis farm in Petrolia I drive a lot between Trinidad Ferndale where my parents live and Petrolia where my farm is and my ranch. My wife and I bought an almost 1000 acre cattle ranch at the end of 2019 for fulfilling a life long dream of owning a large piece of Petrolia. As my friend Michel Evenson always likes to point out when he asked me 35 years ago what I wanted to be when I grow up I always said I wanted to be a cowboy. And when he asked me why I said because cowboys are free. The point of all this is that I'm local I'm not a carpet bagger. I grew up working on dairy farms and farms and cattle ranches. I know agriculture and I know cannabis agriculture as well. My wife had a CBD/THC tincture company that literally saved people's lives. I love the cannabis plant and I love Humboldt county.

When my wife and I bought the ranch in 2019 I knew I would be applying for a cannabis license. Consultants advised me to apply for as much as the ranch would qualify for stating its important not to stack permits and not to limit your future potential. I applied for a permit as large as the property would qualify for. Knowing it would happen in phases that would take the rest of my career in the industry to complete. I knew it would take time and the process would require patience. I believe in process and hit the ground running. I met with the county and was told I could apply for an acre and then later apply for another acre later. I didn't do that as my consultants said that would be stacking permits. I spent close to two years positioning the property and going through the determination of status process in order to prepare the property for its application. During that time I also hired engineers, wildlife experts, and consultants and prepared a project best suited for the property. The site we picked is in a fair corner of the valley so it wouldn't be a visual burden. I do have one line neighbor who would be direct line of sight, but he is also a cannabis farmer and is expanding his grow too.

I currently have three people that work for me in Petrolia and that live out there. One of them bikes to work when he can and the other two live on sight. I'm not trying to build this project out in one year I want to build it and phase it over time as it's economically feasible. There won't be much added traffic as I think it will be years until we scale to the 8 full time employees the project is designed for. There could be up to 35 people which was just an estimate for the planting or harvesting season no more than a couple weeks twice a year. We do drive passed the school but that will be before school starts and after school ends for the day and mostly during the summer when school is out. I've scaled back the project and taking off the light assist portion of the project so it is now 3 acres outdoor with the rest being

outdoor light dep. My goal is to have this be a regenerative farming building up the soil by growing cover crops and other good farming practices. I plan to plant vegetation between myself and my neighbor to help with the view shed issue. I also am going to use solar snap fans in the green houses which are very quite and don't run at night.

Ive spoke with most of my neighbors at a community meeting, and done my best to alleviate the concerns of my neighbors and will continue to talk with them and try to mitigate the problems they have as they come up.

The point of this letter is to let you know who I am and let you know I'm trying to support my neighbors and community while stile running a viable business.

Thanks for your consideration

Karl Benemann "Cisco"

[REDACTED] phone to call

1000

**From:** John Paul Salgado <johnpaulsalgado@gmail.com>  
**Sent:** Tuesday, January 17, 2023 12:17 PM  
**To:** Holtermann, Michael  
**Cc:** COB  
**Subject:** 17384

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

Greetings Micheal Holterman and esteemed members of the Humboldt County Commission,

I am writing this letter to show support for Cisco Benemann and ask that you would allow his project on Chambers Road to proceed forward.

To clarify this on reference to:  
Humboldt County PLN-2021-17384  
1414 Chambers Road

My name is John Paul Salgado. Humboldt resident of 15 years and have worked in the Petrolia area and reside on Chambers Road.

Cisco Benemann has in my eyes been a pillar in this community. He is local, born and raised in this community. He is good neighbor and has the community's interest at heart.

I as former employee and current colleague. He has shown tremendous care a business owner through following County as well as CA set industry mandates. He has proved to respect the neighbors, lands and environment to which I can personally attest. And I know he will continue to do so.

I do not believe that this project will create any impeding traffic or impact the community in any negative way. I truly believe that this project will be a positive impact by providing jobs and money to community.

In summary, I hope that you would this project to proceed forward. It will prove to valuable asset and beacon of light in the community.

Thank You,  
John Paul Salgado

~~Private, IFC~~

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**From:** robie tenorio <robieinthegarden@gmail.com>  
**Sent:** Tuesday, January 17, 2023 12:44 PM  
**To:** COB  
**Subject:** Comments for Supervisor meeting - January 24th 2023  
**Attachments:** January 17.docx

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

Dear Clerk,

Attached please find my comments on the Appeal of PLN -2021-17384.  
I do not have an agenda item number since the agenda has not been released or posted yet.  
But we have been informed that it will be on the Agenda for January 24th.

Thank you,  
Robie Tenorio

100

January 17, 2023

Humboldt County Board of Supervisors  
825 5<sup>th</sup> street  
Eureka, CA 95501

Re: Appeal for the Permits granted November 17, 2022 to Cisco Farms Inc., on Chambers Road in Petrolia, Record # PLN-2021-17384.

Dear Supervisors,

Please support the Appeal of PLN 2021-17384.

To be very clear this project that has been permitted by the Planning Commission is inappropriately sited for its industrial size.

Chambers Road is a very small, often one lane, dead end road, that begins in front of the Mattole Valley school. The road begins at the T of Mattole road; because of the hill leading up to the center of town this is almost a blind turn right in front of the School. It is essential that you as deciders understand the location of this industrial scale business.

#### Public Process

I attended the November 17<sup>th</sup> Planning Commission where this application was discussed and permitted. The meeting was challenging on a technical level because the remote audience was not able to hear the Chair, so those of us wanting to make comments during the public comment period were not able to. But more importantly was the obvious confusion the Commissioners had in regards to Community support for this project.

The Friday before the meeting on November 11<sup>th</sup>, 2022 I looked over the agenda, read the Staff report and many of the other reports attached to this project, Cisco Farms. I also read Attachment 6, which contained at least 14 letters, written in August, from Community members, many who live on Chambers Road who vigorously opposed the project. I submitted my comments opposing the project to the Planning Commission. As an environmentalist and restorationist with more than 35 years of work in the Mattole Watershed, I have made written comments and spoken at many Planning Commission and Board of Supervisors meetings about the negative environmental and social impacts from the permitting of large industrial size cannabis farms in the Mattole Valley.

After reading the robust response from the Community expressed in those 14 letters I was confident that the Planning Commissioners would understand that this particular site on Chambers Road was not appropriate for an industrial size Cannabis business. I assumed that rather than deny the project outright perhaps a significant downsizing conversation would be had and a more social and environmentally appropriate project would develop. BUT much to my disbelief what I heard the Commissioners saying was how much the Community supported the project. WHAT? Unable to speak (because of

those technical problems) during public comment I was unable to bring the issue of community opposition up. Planning Staff was present for the entire meeting and from my view did NOT bring to the Commissioners attention the robust response from the Community in the form of the 14 letters written in August. Staff made no mention that in fact, contrary to the Commissioners understanding and comments, there was not overall support from the Community for this project.

The commissioners voted to approve the plan all the while extoling the community support for the project. The chair of the meeting, Noah Levy said, "Clearly this project has a lot of community support from the letters we have received". Also when the size of the project was addressed, the mitigation to those concerns was the reassurance that the applicant was probably not going to make it that big so no need to be concerned about the size.

At the next Planning Commission meeting, on December 1, 2022 during public comment, Bonnie Blackberry brought up the issue of the 14 letters. The Chair said, " he had not seen the collection of letters", Commissioner McCacavour stated, "nor did I". Later in the meeting the Chair said he was mistaken and he had seen the letters.

I explain this all to you in hopes that you will understand that not only is this project completely inappropriate for this area the public process was very flawed. I will add that in August many of the letter writers specifically requested to be notified of any meetings or actions regarding the Cisco Farm. They were not notified of its being placed on the Planning Commission agenda for November 17<sup>th</sup> 2022.

### Project Concerns

This project as planned is inappropriate for a small neighborhood far from services and infrastructure that would support an industrial scale farm. The roads are not fit for adding more large trucks and workers (up to 34 employees) traveling to and from work. The social, medical and emergency infrastructure is not there to support the level of development proposed for this project.

The road to Cisco Farms, Chambers Road, begins at the school. My grandchildren attend this school and their safety entering the schoolyard from Chambers Road would be compromised if this project were allowed to proceed as permitted. As would the safety for all the other children and people who walk, run and use Chambers Road. Right across the street from the school is the Community center. This is a very well used center of town. It is vital that you understand the on the ground impacts of permitting a large industrial scale farm in the middle of it. Visit the location; see for yourself why the community overwhelmingly opposes this project.

If you travel to the project site you will also see that there is a one-lane bridge that has blind curves before and after it. There is also the very serious issue of Wild Fire. The project is sited out of the Petrolia Fire District and in the SRA but the local VOLUNTEER department would still have to respond to any emergency (both medical & fire).



Evacuation on this one lane, already deteriorated road at the same time as personnel are responding to an emergency is a recipe for disaster.

I have to add that I am surprised and disappointed that considering Humboldt County's economic situation in regards to Cannabis cultivation the Planning Commission would think it is beneficial to permit an industrial scale Cannabis Farm in the middle of an area that has small cannabis farms operated by families living on Chambers Road, their children attend the school, they are active on the Fire Department and in the community and they are struggling to keep their small family farms afloat. Further development of large scale cannabis operations relying on light deprivation and mixed light undermine the efforts of small scale, locally appropriate cannabis farmers, businesses, and coops, who are working hard on creating a viable cannabis industry that is ecologically and socially responsible. It looks like sabotage.

There are many problems with this project and its location. Please read the detailed letters of those appealing this project.

Please support the Appeal of PLN 2021-17384

Thank you,

Robie Tenorio

**From:** Karen Gilda <kmgilda181@gmail.com>  
**Sent:** Tuesday, January 17, 2023 11:49 AM  
**To:** COB  
**Cc:** Bushnell, Michelle; Wilson, Mike; Arroyo, Natalie; Bohn, Rex; Madrone, Steve  
**Subject:** PLN-2021-17384 Cisco Cultivation Project

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

To County Planning Department

This letter speaks to your recent approval of the Cisco Cultivation Project on Chambers Road in Petrolia. Through this appeal process, I urge the Board to reconsider the scale and magnitude of the approval in light of the current market conditions, and the consequences to the residents of Chambers Rd and Petrolia generally.

The cannabis market has fallen precipitously in the past two years. Several local growers are each sitting on hundreds of pounds of pot they can't sell at \$300/lb. Several local growers were, and are, unable to pay their employees for work they did last year. This is so unfair.

Cannabis production did not become the "cash cow" that many governmental entities thought it would. The potholes are still in the roads, while multiple pot-related taxes/fees are being waived.

The Cisco project is at the end of Chambers Rd, so everyone there is impacted by whatever increased activities take place. The road is already pretty hammered and only minimally maintained by the county. (it's true).

It just feels like you've said 'OK' to this big deal, but haven't thought about the consequences. Petrolia doesn't even have enough housing for the projected numbers; will they commute? Also, most of Petrolia is downstream of whatever chemicals he uses.

What can be the the incentive to go so big in these uncertain times? I think it's to have a "legal grow" of such scale that it would be of interest to corporate/big business and therefore be more valuable upon a later sale by Cisco. Also, maybe the time to ask for a lot is when the grower-related taxes are reduced or waived,

Is it not possible to "condition your approvals such that it starts smaller and gets bigger later if requested by the operator. Why can't you say "OK" to X amount now, and "get back to us next year if you want to make changes."

Such an approach might get some buy-in from the community, who generally entrepreneurial activities which fit the area, the lifestyles, the people. The current approval just doesn't feel this way, especially for the Chambers Rd folks, hence the pushback. These sentiments are widespread in the community. I personally have not heard anyone speak favorably of it.

I hope you will reconsider your approval, and put appropriate conditions on the scale of the activities.

Thank you  
Sincerely, Edward Gilda

**From:** Jack Brown <jackbrown@gmail.com>  
**Sent:** Tuesday, January 17, 2023 11:36 AM  
**To:** COB  
**Subject:** Fwd: PLN-2021-17384 Francisco Beneman

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

I am here forwarding my letter of support to this address as well.

-----  
Jack Brown  
US/Worldwide Voicemail [REDACTED]  
Mobile [REDACTED]

Begin forwarded message:

**From:** Jack Brown <jackbrown@gmail.com>  
**Date:** January 17, 2023 at 11:35:17 AM PST  
**To:** mholtermann@co.humboldt.ca.us  
**Subject:** PLN-2021-17384 Francisco Beneman

Attention, Humboldt county planning commission

Hello Folks-

I am a landowner in Petrolia, with ranch property directly adjoining Francisco (Cisco) Beneman's ranch which is the subject of PLN-2021-17384.

Cisco has been a Petrolia resident for decades, and has always been an upstanding and positive member of the community, as well as a family man and an excellent employer to many young people over the years.

He is, as well, the kind of neighbor we all like to have, one who organizes necessary fencing work catches cows when they break out, jumps in his truck when there's a fire or other trouble, and is ready to loan out heavy equipment when needed.

There has been in Petrolia in recent years, a vocal minority of recent retirees from the Bay Area and elsewhere who seem to want our valley to become a retirement community rather than a vibrant place which can support families and bring in new young people from all over the country and the world. These are the people who are opposing Cisco's application, and while their voices should be heard, I believe they do not understand how important the cannabis economy, and farms like Cisco's, are to our collective well being.

Large employers who pay good wages are difficult to find in rural areas, and many of us are grateful that Petrolia and the Mattole Valley are still able to provide the direct and indirect jobs that keep our valley a wonderful place to live.

Please allow this project to go forward.

Jack Brown  
Petrolia

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Jack Brown

M [REDACTED]

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**From:** Lindsay Merryman <lindsay.merryman@gmail.com>  
**Sent:** Tuesday, January 17, 2023 10:54 AM  
**To:** COB  
**Subject:** Letter in support of appeal PLN-2021-17384

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

Attn: Humboldt County Board of Supervisors  
Kathy Hayes, Clerk of the Board  
January 7, 2022

RE: PLN-2021-17384

Dear Board of Supervisors,

I thank you for the privilege of expressing my support of this appeal. Cogent points have already been made by many other writers as to the questionable profitability of another industrial mega grow in a rural area rapidly being disfigured by high fences shielding large white plastic grow houses. Any taxes received by the County from this particular facility's product are questionable and far in the future.

The nearest residents to this project are long term residents in homes whose livability as well as whose real estate value can be expected to be diminished by proximity to the stinky, night light emitting, noisy, high traffic business of a large marijuana growing and processing factory near by. The Mattole Elementary School's students will be affected, coming and going, by traffic on Chambers Road and all the other effects from this proposal.

Current zoning offers little or no protection to the people who came here or stayed for the land's beauty, the night skies, the often rare and unusual wildlife (endangered fishers, Humboldt martens, three species of native salmonids, to name a few well known ones).

Please consider what the Lost Coast area means to all those who inhabit it. Petrovia is a stunningly beautiful area at the north end of a world famous hiking trail. The BLM's website refers to "one of the few coastal wilderness hiking experiences in the United States" and mentions "exceptional wildlife viewing opportunities such as sea lions, elephant seals, river otters, eagles, bobcats, deer and more." Zoning could be interpreted to reflect THIS reality and to protect what most people visit this area to see, as well as long term HUMAN residents.

It is outrageous that you, the supervisors of this beautiful county, would destroy the quality of life of present long time (and short time!) neighbors, while at the same time approving the construction of "1280 SF farmhouse/employee housing . . . for up to twelve employees."

I urge you to grant the appeal and protect the residents of a rural area who are struggling to save their town's character from erasure by another trendy business.

Thank you for your attention to this appeal.

Sincerely,  
Lindsay Merryman  
[REDACTED] 95558  
POB 13  
Property owner

**From:** Morgan March <morgan.lo.march@gmail.com>  
**Sent:** Tuesday, January 17, 2023 10:28 AM  
**To:** COB  
**Subject:** Cisco Farms Inc - PLN-2021-17384

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

I am writing to express my strong opposition to the proposed industrial cannabis grow and associated infrastructure on Chambers Rd in Petrolia by Cisco Farms Inc.

As a fulltime resident in Petrolia, my reasons for opposition to this project include the following:

- environmental concerns not adequately addressed -the potential for light pollution, fertilizer and pesticide runoff, excessive plastic use, taking water from endangered salmonid populations in the watershed
- Safety concerns for pedestrians, bicyclists, and even other cars due to the increased traffic this project would create (and large truck traffic)
- infrastructure concerns, Chambers Rd is a windy, pot-holed dirt road that is in no way adequate for industrial traffic
- location on one of the main residential roads in Petrolia. This is a rural residential neighborhood, not reasonable siting for an industrial cannabis operation of this scale. Both roads that would be used to access it run run past the community center, elementary and high schools, as well as numerous homes. Joggers, children, people walking dogs frequently utilize this small, windy rural road. The proposed development would cause real harm to the community due to its inappropriate location.

For all the above reasons, I urge you to oppose the proposed development.

Sincerely,  
Morgan March

**From:** Marcia <mne145@yahoo.com>  
**Sent:** Tuesday, January 17, 2023 9:46 AM  
**To:** COB  
**Subject:** Fw: Petrolia Chambers Road and Landowners Appeal of Cisco Farms Inc., Petrolia Area

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

**To:** cob.co.humboldt.ca.us  
**From:** Marcia Ehrlich, 1134 Chambers Road, Petrolia, CA 95558  
**Sent:** Tuesday January 17, 2023  
**Subject:** Fw: Petrolia Chambers Road and Landowners Appeal of Cisco Farms Inc., Petrolia Area

Petrolia Chambers Road Residents and Landowners Appeal of Cisco Farms, Inc.; Petrolia Area Record Number PLN-2021-17384 - Appeal (filed 12/05.2022); Assessor's Parcel Number: 105-101-011, 104-232-005, 104-191-001.

The location, size and scope of the Cisco Farms, Inc. proposal approved on November 17, 2022 worries me for two additional reasons.

There is a safety dimension surrounding the cultivation of marijuana. Armed robberies are a fact of the profession, even since legalization a couple of years ago. The town of Petrolia has no policeman and no closer protection from armed robbery than Eureka, as Petrolia is unincorporated.

When I first moved here in 1982 and for many years thereafter, if there was a theft or molestation, or dangerous encounter, the accepted rule was to immediately phone The Hideaway or The Yellow Rose - the 2 local bars. The bar would empty in 60 seconds and men would go and take on the situation and help whomever was in trouble. There are no bars in Petrolia today. So the solution lately has been to phone the Petrolia Volunteer Fire Chief. And the beleaguered Chief will figure out how best to get things handled. An armed robbery in progress is something I have not heard he has had to deal with. However armed robberies continue to happen around the cultivation of marijuana in our County.

What sort of protection against this problem is envisioned by the Board of Supervisors for a project large enough to become a target for this? The safety of the people on site and for the surrounding households is vital to consider by the Board of Supervisors.

The second worry surrounding an unusually large cultivation and processing center is the front and center visual sight the Elementary School children on the playground right beside Chambers Road will have. Yes cultivation is an acceptable profession but nowadays one has trouble aspiring to enter this ranching enterprise because it now takes owning vast tracts of property and having a lot of money to begin. Young people who aspired to doing cultivation are now finding such a career is no longer as viable as they once dreamed. The nature of this profession has shifted to people who already have a lot of money. A huge industrial cultivation scene passing before school children eyes will give a distorted picture of what career they can pursue. Current classes include environmental restoration, best practices to protect and preserve their planet as the decades roll forward. Reviving old practices to use care when ranching or living in an environment shared with wildlife and fish. I have



seen and heard wonderful changes to ranching by the generation that went to school with my children 30 years ago. I have seen first hand how what is learned at school reverberates in their lives.

So what are the consequences for all the young elementary students aspiring now to become a part of the evolving marijuana cultivation profession? Does the Cisco Farm, Inc build out and traffic headed to a manufacturing plant unduly influence them similarly to say siting a high tech manufacturing plant there would do? Or siting a gun manufacturing plant at the end of Chambers Road would do? The location is in a very influential place for school children to see daily. Please give consideration to this influence when you make your decision about this Appeal. Thank you.

Submitted by Marcia Ehrlich, [REDACTED], Petrolia, CA [REDACTED]

**From:** John Williams <jgwill@frontiernet.net>  
**Sent:** Tuesday, January 17, 2023 9:51 AM  
**To:** COB  
**Subject:** Letter re PLN-2021-17384  
**Attachments:** Letter re PLN-2021-17384.docx

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

Dear Ms Hayes,

Please find attached a letter regarding the Cisco Farms permit appeal, which will be heard on the 24th. Can you please let me know that you received this, and also let me know how I can use a PowerPoint file when I present the appeal. I could bring this on a memory stick, or I could send in the file ahead of time.

Thanks,  
John

--  
John G Williams  
[REDACTED]  
(mail to [REDACTED])  
Petrolia, CA 95558-0214  
[REDACTED]  
[jgwill@frontiernet.net](mailto:jgwill@frontiernet.net)

John G. Williams, Ph.D.  
██████████ Petrolia, CA 95558

January 17, 2022

Humboldt County Board of Supervisors  
By email

Re: PLN-2021-17384

Dear Friends,

I am writing in support of the appeal by Dan Berger and others of the Planning Commission's decision to approve a permit for the Cisco Farms cannabis cultivation facilities (PLN-2021-17384).

In adopting the Initial Study and Mitigated Negative Declaration" (Initial Study), the Planning Commission found that the project as mitigated would have no significant environmental impacts, so the impacts would be "less than cumulatively considerable." Local residents disagree, as evidenced by the number of people joining the appeal.

The Initial Study is fatally flawed in several respects, detailed in my August 2022 letter to the planning commission (attached below as an appendix to this letter), in the 13 other letters to the commission that opposed the permit, and in the appeal. Here, I amplify a point I made about the impacts of the cannabis industry on the local social fabric, and make a point about the geographic scopes of the cumulative impact analyses in the Initial Study and in the 2018 FEIR for a county cannabis ordinance.

Social Fabric:

Petrolia is remote. It takes about an hour for a sheriff or an ambulance to get here, so local welfare and public safety depend on volunteers working through organizations, such as the Petrolia Volunteer Fire Department, the local Neighborhood Emergency Service Teams organization, the Mattole Valley Community Center, and the Mattole Valley Resource Center (which has a part-time paid staff but an active volunteer board). Thus, for example, during the recent storms and extended power outages, relief supplies brought out by Supervisor Bohn and others were distributed by a joint effort of the Resource Center and the Community Center.

This system has worked well because the community is relatively tight-knit and egalitarian; everybody may not know everybody, but most people know most people. A small group of people does most of the volunteer work, although others pitch in during emergencies or for some kinds of occasions. Some long-time and smaller scale growers, who grow in order to live here, are among these groups of volunteers.

However, the recent explosion of the cannabis industry threatens this state of affairs. As the scale of grows increases and the grows become more 'businesslike,' there are more people who

John G. Williams, Ph.D.  
[REDACTED], Petrolia, CA 95558

are here in order to grow, and who are in but not of the community. In short, there are more non-volunteers per volunteer, and at some point the energy of the volunteers will be exhausted.

Geographic Scope:

There have been several recent court decisions regarding the geographic scope of environmental assessments, and probably the most germane is *League to Save Lake Tahoe Mountain Area Foundation v. County of Placer* (2022) 75 Cal.App.5th 63. This sets a reasonableness standard: “The geographic scope to be analyzed must be reasonably defined. It cannot be so narrowly defined that it necessarily eliminates a portion of the affected environmental setting. Nor may it be defined so broadly as to dilute the significance of a project's cumulative impact.”

The Initial Study only considered cumulative impacts within one mile of the project, and otherwise depended on the analysis in a county-wide 2018 EIR: “In other words, the County has already analyzed the cumulative impacts of commercial cannabis activities within the project area and determined that projects that are consistent with the CCLUO and the FEIR would not result in significant impacts” (Initial Study at p. 103). This approach fails reasonableness test just described. Downtown Petrolia and adjacent areas along the Mattole Road are slightly more than one mile from the project site, and so beyond the arbitrary one mile criteria used in the Initial Study. Thus, the assessment in the Initial Study eliminated a portion of the affected area where more people live. On the other hand, the geographic scope of the assessment in the 2018 CCLUO FEIR is defined so broadly as to dilute the significance of the project’s impact on the local area.

I urge you to scale down the project to one acre of outdoor cultivation, or else recognize that the project will indeed have impacts that will not be mitigated, and require an EIR.

Sincerely,

John Williams

Appendix A.

August 23, 2022

Humboldt County Planning and Building Dept.  
By email

Dear Mr. Holderman:



I am writing regarding the proposed Cisco Farms cannabis cultivation facilities (PLN-2021-17384), in particular the “CEQA Initial Study and Mitigated Negative Declaration” (Initial Study) and related documents. Based on my review, I find that the Initial Study is fatally flawed in several respects:

the Initial Study fails to analyze the cumulative impacts of the cannabis industry on the Petrolia area;

the Initial study assumes, contrary to evidence, that permit conditions will be implemented;

the Initial Study fails to consider the long-term economic viability of the project, and what will become of it when it becomes unprofitable;

the Initial Study and supporting documents are flawed in various other ways, some serious and some minor.

I address these points in turn below. Although the points should stand on their own, I note that I have a Ph.D. in Geography with emphasis on climatology and have published two scientific books and many scientific papers; I served for two terms on the Board of Directors of the Monterey Peninsula Water Management District while it was doing environmental analyses for a proposed new dam; and I have been involved with various environmental matters including CEQA-related litigation.

1. Cumulative impacts:

“Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time” (Cal. Code Regs, Tit.14, sec 15355). The Initial Study provides no analysis of the cumulative impacts of cannabis cultivation on the environment of the Mattole Valley generally, and on the Petrolia area in particular. This is a fatal flaw, because the cannabis industry has exploded in the area in recent years, to the degree that many of us feel rather run over by it; this project will only make matters worse.

There is no question that the cannabis industry strongly effects the environment in and around Petrolia. The initial study notes that there are twelve active commercial cannabis operations within one mile of the proposed project: “Based on review of 2019 aerial imagery and Humboldt County Planning Department database (Accela, 2022), 27 off-site residences and twelve (12) active commercial cannabis operations are located within 1 mile of the Proposed Project area (Figure 3, Figure 4).” However, this one mile cutoff is arbitrary; just beyond one mile there are other commercial cannabis operations, for example in parcels 105-081-011, 105-081-118, 105-081-016, and 105-051-009; cursory review of the Humboldt County GIS imagery for the areas shows others which may not be permitted. (The large operation in 105-051-009) is so new that it does not show up on the GIS imagery.)

Section 15355 of the State CEQA Guidelines defines a cumulative impact as the condition under which “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time” (California Code of Regulations [C.C.R.] Section 15355). Probably the most important case on the topic is *Whitman v. Board of Supervisors* (88 Cal.App.3d 397 (Cal. Ct App. 1979)), which concerned a somewhat analogous situation: the CEQA analysis for a single exploratory oil well in an area with many existing wells. The court found that the EIR approved for the project was deficient because cumulative impacts were inadequately addressed. Similarly, the effects of the proposed project must be assessed in light of the effects of the many existing cannabis operations:

The Initial Study fails to do this, even though the area is already heavily impacted by existing cannabis operations. Consider electrical supply and housing. Existing cannabis operations use so much electricity that an existing grower on Chambers Road is unable to get a promised 200 amp connection, and only a little capacity remains to serve residential users. Meanwhile, the scarcity of available housing has many workers from existing operations living in trailers or other makeshift arrangements. The proposed project will provide housing for only eight of its workers, leaving up to 26 of them looking for housing elsewhere in the area. Where will they find it? The need for housing arising from the project must to be analyzed in the context of the overall shortage of housing for workers in the area. The Initial study however, provides no analysis; instead, it makes the following questionable or irrelevant findings (p. 80):

- a) Finding: The project would not induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure). *Less than significant impact.*
- b) Finding: The project would not displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere. *No Impact.*

Another major impact of the cannabis industry on the Petrolia area comes from seasonal workers, or ‘trimmigrants.’ The problem has abated somewhat recently, but we still have people camping or living in their cars as they look for seasonal work. This is particularly a problem because of the scarcity of public services in this remote area. In response, the Mattole Valley Community Center produces and distributes a ‘user’s guide’ to the area, explaining what facilities and services are available (or not) in the area. It also provides wireless access that is the only means of communication with home available to many. Because there are no public toilets in the area, trimmigrants doing their business in the bushes were a public health as well as

an aesthetic problem until the Mattole Valley Resource Center bought<sup>1</sup> two porta-potties that are kept at the Community Center (and cleaned by a volunteer – bless her heart). Many of the trimmigrants (and regular workers) live in crowded quarters that were the scenes of several early outbreaks of Covid-19 in the area. The proposed project will compound these problems. The Initial Study notes (p. 5) that “An additional 22 contract<sup>2</sup> laborers would be hired during peak seasonal events such as planting, harvesting, and processing,” but just as it says nothing about where they will live, it says nothing about what they will do while they are waiting to be hired, what they will do when they are not working, etc.

2. Unjustified assumption that permit conditions will be followed.

The Initial Study assumes that permit conditions will be enforced, which flies in the face of experience. Unlicensed grows operate in our area with apparent impunity, and many licensed grows sell to the ‘traditional’ market as well as to the legal market. Other cannabis operations that are supposed to use rain catchment are up and running despite a lack of visible rain catchment facilities and a shortage of rain. Greenhouses are lit up when they are supposed not to be. Many workers in these operations live in trailers, probably without proper septic systems, etc., etc. Humboldt County lacks the resources to enforce permit conditions effectively (the more so since Measure S taxes were slashed), and while this remains the case, the Planning Dept. acting as the lead agency, cannot simply assume that impacts will be mitigated by conditions on permits.

3. Long term economic viability of the project:

The Initial Study describes facilities to be constructed, but does not explain what will happen to them when cannabis cultivation in the Petrolia area becomes unprofitable, and the facilities become unused. This is not just hypothetical. It is well known that profit margins in the industry are already slim (e.g., Duncan 8/6/22), to the extent that the Board of Supervisors recently reduced Measure S taxes by 85% in order to keep cultivation economically viable. More technologically advanced growing operations with lower production costs such as Glass House Farms (<https://www.glasshousebrands.com/>) are coming into production, which will drive prices even farther down. Some local operators are currently operating at reduced capacity or simply foregoing cultivation until they can sell their product on hand, and some smaller producers have gone out of business. In the longer term, tobacco companies are moving into the market (<https://www.forbes.com/sites/dariosabaghi/2021/08/02/cannabis-is-part-of-the-future-of-big-tobacco/?sh=765cdeb071ed>; <https://tobaccotactics.org/wiki/cannabis/>).

Cannabis operations in the Mattole Valley and other remote areas are particularly vulnerable to competition, because of the increased costs associated with their locations. Being remote was an advantage when cannabis cultivation was illegal or quasi-legal; now it simply increases production costs. The Mattole Valley is not an economically rational place to grow cannabis,

<sup>1</sup> I should note that two growers contributed toward this purchase.

<sup>2</sup> This suggests that these workers will be improperly classified as independent contractors, rather than employees. It is an open secret that this is common practice in the industry.



fantasies about Humboldt becoming the Napa of Weed notwithstanding, and it is predicable with high probability that before long the valley will be littered with remains of plastic greenhouse covers and other cannabis-related detritus, unless the county requires remedial action. The remains of the proposed project would only add to that problem. For example, the project includes a pond which will provide habitat for bullfrogs, within hopping distance of a stream that supports listed steelhead. Proper management can control bullfrogs, but the county should assume management will end when the project ceases operation.

#### 4. Problems with the Initial Study and supporting documents

Close reading of the Initial Study and supporting documents shows that they are intended for checking boxes, not informing decision makers. Much of the text is boilerplate, with much attention to largely irrelevant material that serves to obscure what actually matters. For example, the Initial Study takes several pages to say that the site was surveyed for cultural resources and none were found. Other parts of the Initial Study are unclear, or inaccurate.

Consider the example of electricity: The Initial Study (p. 6) is vague about the source of power during construction and early phases of the project: “Energy demand would increase gradually over the proposed five-year buildout plan (refer to “Construction” description below), and the photovoltaic power system would be the primary source of power until a PG&E upgrade could be obtained.” However, the photovoltaic system is to go on top of buildings that are to be constructed, so it is unclear where power for construction would come from. According to the Operations Plan (p. 22), “Energy shall be required for cultivation (fans and lighting, where applicable), nursery activities, drying, processing, and resident employee uses, as applicable. At total of 639,962 kwh is predicted once the Project reaches full capacity and is based on (and limited by) 600-amp service by PG&E. **It is estimated that the earliest this service would be available is 2026 ...<sup>3</sup>**” (emphasis added). However, according to the Schedule of Activities (p. 32), the project will begin operations in 2022, and expand them annually for five years, such that the project will be completed by the time PG&E power may become available! To compound the confusion, the Project Description says, (p. 9): “Electricity for the Project and ancillary activities will be provided by grid power, with the exception of greenhouse fans, which may be grid or solar powered. Grid power use **may** be offset in future years through the installation of a permitted solar array” (emphasis added). All of these statements cannot simultaneously be true.

The Initial Study includes a mitigation measure apparently intended to address the period before PG&E and photoelectric power becomes available, which says in part that: “Prior to the onset of power, proposed cultivation shall be outdoor cultivation cultivated using light-deprivation techniques in greenhouses.” If you are not sure what that means, neither am I.

On some related minor points, predicting electrical demand at 639,962 is an example of “spurious precision,” which can be defined as “A value stated with more precision than is

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<sup>3</sup> Other growers in the area have been told that it will take longer than that, if ever.

actually possible, given the accuracy of the values from which it has been calculated.” This is but one example of many in the documents. Spurious precision may impress naïve readers, but, like the unctuous language of the documents, actually undercuts their credibility. Somewhat along the same lines, the Operations Plan (p. 23) states that: “PG&E: In 2019 (the most recent year data is available), all of PG&E’s power mix was greenhouse-gas free.<sup>7</sup>”. Footnote 7 is: [https://www.pge.com/en\\_US/about-pge/environment/what-we-are-doing/clean-energy-solutions/clean-energy-solutions.page](https://www.pge.com/en_US/about-pge/environment/what-we-are-doing/clean-energy-solutions/clean-energy-solutions.page), which states that 93% of PG&E’s power for 2021 was greenhouse gas free. This is a trivial matter, but it illuminates the credibility of the document.

Or, consider the example of water: Evaporation from the pond is estimated at zero for October through April (Table 2 in the Operations Plan), which cannot be correct. Similarly, the efficiency of roof-top water collection is over-estimated at 100%. Just as substantial evaporation occurs from trees during rainstorms (Reid and Lewis 2009), significant evaporation will occur from roof-tops, and during intense rain, the gutters may overflow. The formula given at p. 9 in the Operations Plan does not account for this, not does it account for water lost to leaks, etc. The efficiency of rain catchment systems is commonly estimated at 75% (e.g., Rahmat et al. 2020). This overestimate matters, because it implies that the collection system will not meet the estimated demand in some dry years.

Water use for non-agricultural purposes seems underestimated. According to the operations plan: “3.2.3.3. Resident Employees. Farmworker housing water use is estimated at 40 gal/day per person. This is for all domestic use, including but not limited to: drinking, toilet facilities, laundry, other sanitation, pets, and small vegetable garden uses. Farmworker water use is shown in Table 2.” This seems like a low estimate; during the drought of 1976-77, the Monterey Peninsula had rationing of 50 gal/day/person, which was regarded as onerous.

Or, consider traffic: As noted by the Initial Study, “Chambers Road is used to access private residences along the road. Traffic data about Chambers Road was not readily available at the time of publication of this study.” It is a dead end road, so it should not be hard to estimate traffic by counting the houses (~25). In fact, traffic there is currently light, so a business with up to 24 employees at the end of it will substantially increase traffic over current levels. The local public school fronts on the road where it meets the Mattole Road, which the Initial Study does not mention. The road is described as meeting Category 4 standards, which include: “Two lane - narrow roadway, low to moderate speed - 25-40 mph.” This more accurately describes the Mattole Road than Chambers Road, which is too narrow for a white line, and for which 25 mph is fast.

According to the Initial Study (p.6): “At full-build out, during operations, the Proposed Project would result in an average of 8 daily trips by full-time employees and an additional 44 trips by seasonal contract laborers for a total of 52 daily trips during peak season events. The calculation of 8 daily trips was based off 8 of the 12 full-time workers living onsite, leaving 4 fulltime employees to commute to the site twice daily.” This seems to assume that the eight

John G. Williams, Ph.D.

 Petrolia, CA 95558

workers who live on site will simply stay there, or else travel to Petrolia only by foot or bicycle or by hitching a ride. This last example is by itself trivial, except that it shows how the Initial Study lowballs impacts. Similarly, the Initial Study correctly notes that, according to the county's website, "Petrolia has an estimated population of approximately 1,000 people." This can be true only if the county intends "Petrolia" to mean the whole lower Mattole Valley,<sup>4</sup> but it tends to make the effect of the 26 employees seem smaller.

In conclusion, the county needs to have an environmental analysis that considers of the cumulative effects of cannabis cultivation on the environment of the Petrolia area<sup>5</sup> before it can approve this project. It also should have an analysis that accounts for the deficiencies noted above. However, given developments in the industry, the county should encourage the applicant to cut its losses and abandon the project. The history of the Petrolia area has been a history of booms and busts: oil, tan bark, and Douglas-fir; cannabis is only the latest.

Sincerely

John G. Williams

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<sup>4</sup> I count about 100 households in the area around Petrolia including all of Chambers Road, the public part of Conklin Creek Road, much of Lighthouse Road, Clark Road and North Fork Road.

<sup>5</sup> This might be defined as within three miles of 'downtown' Petrolia.

January 16, 2023

Hello again,

I respectfully re-submit my letter of opposition to the Cisco Farms, Inc. (PLN-2021-17384) proposal at this time when an appeal its approval is being heard (see previous letter 8/25/22 below). I truly hope that in this appeal process, the Planning Commission will realize how strong the opposition to this project is, & how harmful a project of this size would be to the small community of Petrolia, as well as to the precious environment in the Mattole Valley. This project should not be approved.

Thank you for hearing my voice.

Sincerely,

Lynn McCulloch

[senora@frontiernet.net](mailto:senora@frontiernet.net)

\*\*rural property owner in Ferndale & Petrolia opposed to large-scale cannabis cultivation in Humboldt County

August 25, 2022

To whom this may concern,

Once again I am sending my comments to the Humboldt County Planning & Building Department re: large scale cannabis cultivation in the Mattole Valley. The conditional use permit being solicited by Cisco Farms, Inc. is once again, too big for the small rural valley inhabited by a number of residents who feel that this kind of development is changing the quiet place they chose to live in, where truck traffic through the local school zone, fan noise, lights, smells, fire danger, acres of plastic, & potential water pollution are exactly what they oppose for their community. It is also, once again, dividing the community.

Sadly, we feel that our comments go ignored each time another over-sized cultivation plan goes forward. I have been told that growers submitting these plans are advised to go for "pie in the sky" as they draw up their proposal, in case they want to increase their size once the initial phase has been completed. I ask WHY ARE THEY NOT SUBMITTING PLANS FOR THE SIZE WHICH THEY FEEL IS ETHICAL instead. One acre grows should be the limit, & I don't mean one acre of greenhouses. I mean one acre of "in ground" plants, with possibly a small greenhouse nursery, limited to ONE. Cannabis cultivation has gotten way out of hand in our county. Where are the regulations that support SMALL, ETHICAL ONE ACRE FARMS? If the price is just too low to sustain a farmer with only one acre, then maybe that farmer needs to have a few other enterprises going on. This large scale model is not good for our county's youth. It makes it look like large-scale farms are the best option to make enough money to live here.

Our ecology is being altered, as in unmonitored water extraction & pollution to our rivers & streams. The very reason that tourists want to visit our area, that is to experience the clean air & water & open spaces, is being challenged by increased cultivation on overly large scales. Those of us who live here also value those things. We can no longer "green light" over extraction & exploitation of our open spaces. It's time to set limits NOW, or our grandchildren will be looking at nothing but plastic greenhouses, or their leftover waste left behind post cultivation, & dried up rivers & streams. They will not have the luxury of a night sky filled with stars, or the silence found in our still wild places.

Maybe this sounds extreme, but if things continue to go unchecked, this might be exactly what we are left with. Even the unincorporated areas need

to have a say in this. Please hear our voices of opposition & start ensuring that large scale cultivation is stopped.

Thank you for your time & attention.

Sincerely,

Lynn McCulloch

**From:** tkcook1@frontiernet.net  
**Sent:** Monday, January 16, 2023 7:53 PM  
**To:** COB  
**Subject:** PLN-2021-17384

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

January 1, 2023

To whom it may concern:

This is a joint letter in support of Cisco Benemann on Chambers Rd. in Petrolia, PLN-2021-17384.

We live at the very end of Chambers Rd and have known Cisco for twenty years. He is a good neighbor and we have always had a good relationship with him.

He is trying to do the right thing and always has. I don't see this as a problem. There is cannabis everywhere and it is not worth much now. I don't see this as a monster grow site as the return is not there.

As previously stated, we are on the end of Chambers Rd, past Cisco's, so if anyone is impacted it would be us.

The problem I have with the negative hypocritical people is the illegal houses and illegal septic tanks around here. A grow site can be cleaned up in thirty days whereas the houses and illegal septic's will be polluting ground water for decades.

We vote to approve this project.

Thank you for your time,  
Tim & Kathy Cook

**From:** Sara March <smarch13@gmail.com>  
**Sent:** Monday, January 16, 2023 8:21 PM  
**To:** COB; Bohn, Rex; Madrone, Steve; Arroyo, Natalie; Bushnell, Michelle; Wilson, Mike  
**Subject:** Cisco Farms Inc, proposed development

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

I am writing in reference to PLN-2021-17384

Dear Supervisors,

I am writing regarding the Planning Commission's November 17, 2022 approval of the Conditional Use Permit for new cannabis cultivation, drying, processing, and propagation facilities by Cisco Farms Inc, on Chambers Road in Petrolia, Record # PLN-2021-17384.

I am a resident of Petrolia and my child attends Mattole Elementary School located on Chambers Road. I have serious concerns about pedestrian impacts on both Chambers and Mattole Roads due to the proposed cannabis development by Cisco Farms, Inc. As I am sure many of my neighbors have expressed, we already deal with constant safety concerns for ourselves as pedestrians -- and especially our children and pets -- in Petrolia in regards to traffic. There are no sidewalks in Petrolia, and Chambers Rd is one of the only roads I am able to allow my son to ride his bike on or walk down in our community. I cannot imagine being able to allow him to bike or walk down this road with his friends with the increased amount of large truck traffic that this development would create. Additionally, there is a one lane bridge on Chambers Rd which is already incredibly dangerous and was supposed to be a temporary bridge only. It is already a safety hazard and certainly couldn't handle the additional traffic and large trucks that would be necessitated by this operation.

In addition to the immediate safety concerns for my family about this project, I am also highly concerned about continued degradation of the Mattole River watershed in general.

As climate change continues to increase droughts in California, more industrial scale farming operations are completely unsustainable and unconscionable, especially along the remote, sensitive Mattole River. Also, the pond created by the proposed development would also create habitat for invasive bullfrogs which would endanger local native amphibian and fish populations. Light pollution from lighting from cannabis grows and their infrastructure is also a constant source of damage to wildlife and irritation to neighbors.

I support legal cannabis, but I do not support this project due to its unreasonable size and specifics of its location. Please do not allow Cisco Farms Inc, to endanger the safety of our remote rural community's residents, degrade the Mattole River, and damage our quality of life with such a large industrial operation so close to downtown Petrolia.

Thank you for your consideration,

Sara March  
Petrolia, CA





**From:** Jason Goforth <goforth85@gmail.com>  
**Sent:** Monday, January 16, 2023 8:24 PM  
**To:** COB; Holtermann, Michael; Johnston, Desmond; Johnson, Cliff; Bohn, Rex; Bushnell, Michelle; Wilson, Mike; Arroyo, Natalie; Madrone, Steve; Ford, John; lostcoastmadman@gmail.com  
**Subject:** PLN-2021-17348 BOS appeal public comment

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

To Whom It May Concern,

I am writing today to voice my strong support For Cisco Farms (PLN-2021-17385) and to urge the board to reject the appeal as presented.

I have been a lifelong resident of Petrolia and grew up on Chambers Road. While I can sympathize with neighbors that are against change and want to have more influence to dictate how owners can use their land, I just don't agree with them. After reading the initial appeal and the subsequent letters objecting to the project I feel that there are a few points I would like to address.

-First I would like to note that I have every confidence that Cisco plans to run his farm in a responsible manner. Even among the people in opposition to this project I don't think there is a single one who would claim anything other than Cisco being an honest upstanding person. From everything I have read and heard and from the multiple conversations with Cisco about the particulars of this project I have no doubt in my mind that he is doing everything in his power to engage in this process in good faith and make every attempt to mitigate any negative influences to the community.

-The cultivation site is tucked back at the end of Chambers Road in a location that is about as far from the view of the community as it is possible. If there was going to be a grow on the main road in public view I can see visual impact being a legitimate concern for neighbors, one that I mostly share, but as far as I know the view of this area is limited to one neighbor that already has an active permit on their property. Cisco told me it was his intention to create additional buffers to mitigate any line of site to his grow in cooperation with the homeowner/cultivator in question.

- Cisco has informed me that he made one very important concession on his project to the County, that he will no longer be seeking to build any light assist cultivation. Any multiple run type growing will be done with light deprivation, not supplementation. The only part of his project that will employ light assist will be the proposed nursery area. Hopefully this will go a long way to dealing with the concerns of light leaks from the property. Although leaks are still possible in a nursery, the provisions of 2.0 say that there can be no light leaks. If he is diligent in covering his nursery there will be no light pollution, if he's not there are mechanisms in place that the County can act on to force him to bring his operation in compliance, up to revoking his entire permit. These are very effective tools and should put this issue to rest.

- Power for the project is another issue I have seen raised. Although it seems that there is not currently enough power to supply the full proposed operation that shouldn't be of concern at this point. 2.0 Has no provision that allows for diesel generators to be used, and again has very effective tools to deal with cultivators who are in violation. With as much scrutiny as this project has faced I doubt if a generator could even be brought to this project without a complaint being filed.

Why I don't see the lack of power as an issue here is that the project will be built in phases. At each phase an appropriate power source will need to be in place, whether that be solar panels, new PGE, wind generation or some other plan to include things like off site processing or off site nursery operations. If these plans are not in place the county will not allow cultivation. I know this because I am dealing with a very similar situation due to the capacity issues

1

from PGE. From first hand experience I can tell you that County Staff takes this very seriously and doesn't 'let it slide'.

- Water is another primary concern for neighbors. Again I believe this to be a non issue. To the best of my knowledge this project is designed to operate 100% on rainwater catchment ponds and tanks. I don't know what else there is to even say here. My understanding is there are four wells on the property, none are for cannabis. Two wells were drilled and turned up dry and were filled in, one is a historic well that supplies the residence and the last is a well that is used for the cattle dating back 20 years or so, drilled by the previous owner. I made the suggestion to Cisco that he add water meters to his two producing wells to proactively show that he is not diverting for cultivation and he seemed very open to the idea. I'm not sure what else can realistically be expected from any applicant on this front. If he can't collect enough water to cultivate he will have to let his fields fallow or dry farm. Again, this is an issue the county takes very seriously and will have no problem taking action if he is found to be in violation.

- Noise. I have a bedroom with the windows open year round just over a 1/4 mile in direct line of sight over pasture land to Cisco's other active project and I have never heard any noise from that currently operating project. In fact I hear more from the cows that live in the land between my house and the cultivation. This is not to say that everyone else in the area has the same experience, it is just mine, noise has odd ways of traveling. Again, Cisco seemed to be very open to responding to any issues of this nature that neighbors have brought to his attention.

-It has been said in multiple letters accompanying this appeal that there is no faith from the public that the County can adequately handle code violations and are ineffectual at investigating complaints and for that reason this operation should be scaled down. I vehemently disagree with this characterization. From my time in this process for the last six years it is my experience the county is very effective at taking action against operations that are in violation and very effective at hammering unpermitted grows. Every person I saw trying to skip permitting got shut down. Although the backlog of cases in the early days may have led to longer enforcement times and in many cases the process was not as immediate as people expect, unpermitted cannabis grows in Humboldt County are virtually a thing of the past. I would suggest that the County better educate the public about its code violation reporting process, as there seems to be a wide gap between how the County deals with code violations and how the public views how the County deals with code violations. I think this alone could give the general public, who in most cases are very misinformed about the realities of the permitting process, a lot more faith that the County can and will handle their concerns and address actual code violations in a proper manner.

Just to note, as far as I know Cisco has never had a code violation on his currently operating permit. The County's perceived inability to address code violations should not hamper any application, especially from cultivators who have a history of being fully compliant.

- Probably the most contentious issue of all may be the public road access to the site. I agree that the county needs to do more to maintain Chambers Road. Regardless of if there are any active cultivation permits on the road the neglected paving and one lane 'temporary bridge' situation is something that everyone on the road would agree needs to be addressed. In as far as the signage and road markings are insufficient or not in accordance with State regulations, especially around the school, the county should work swiftly to find a solution as this is an actual safety issue. The fact remains that Cisco farms is close to a 1,000 Acre tract of land, literally any use other than the single residence will cause more traffic on the road. I grew up on Chambers Road and most of the signatories of this appeal that live on Chambers were not there when I was a child, I can count at least 10 houses that have been built since I walked to school along that road. This is a public road used for many different reasons, all that contribute to the difficult maintenance issues that most of our rural county roads suffer from, singling out and punishing cultivation instead of directing that energy to pressuring the county for a solution is misguided in my opinion. That single bridge has been there forever. The road has been poorly maintained forever. If anything the rough roads force people to drive slower so they don't slam into the potholes.

I also take offense to the idea that more traffic is putting pedestrians at risk. I have family with small children that regularly walk along that road. I will say that Chambers Road had the least traffic these last two years than it has had in the last 20, but even at the height of the market boom where the traffic was orders of magnitude more than today I am unaware of any serious issues of pedestrian safety. Anybody not following traffic laws or acting irresponsibly would be quickly reprimanded by any number of people living along that road or in the greater community. I can understand that

people don't like the traffic, but in my opinion it is not a reason to deny or reduce the size of this permit, nor do I believe it will be as disruptive as people imagine it to be. Nobody wants to see any children be hurt and any suggestion otherwise is disingenuous and designed to be an emotional appeal.

There will not be 37 cars driving down that road four times a day as some letters have suggested. There will be more traffic, that's undeniable, but most will come during planting and harvest, a process that on a well run farm is a rather short ordeal. The rest of the year will be a much smaller crew of people keeping up on plant maintenance. 37 is the max number of employees, not the year round full time employee amount.

-If there is to be any legal cannabis industry in Humboldt it is essential that we have people of Cisco's caliber around instead of faceless corporations, something that this project is not. I feel that it is important that people who engage in this process and invest considerable time, effort and money into these farms have confidence they will be treated fairly and not punished through no fault of their own. The rules, no matter how much people on both sides may have disagreements about them, are written out. There is a process to go through to obtain a license, and it is a long difficult one. I would say that it is a slap in the face of all the good actors in the business to constantly see cultivators who have jumped through all the hoops, complied with all rules and regulations, gotten all the required studies, maps, plans and surveys, kept up with all the monitoring, annual reports and inspections, paid more tax per capita than any other businesses and dealt with more regulation and oversight than any other industry all while keeping a clean product needing to meet the most strict testing requirements of any agricultural crop to be put before the BOS and through no fault of their own have onerous restrictions and conditions placed on their projects. I fail to see how the Board can honestly expect any cultivators to have any trust in a system that treats them this unjustly.

I look forward to seeing a successful Cisco Farms that is run by a respectful operator who has the best interests of the community at heart, provides some full time local employment and is open to a free exchange of ideas with neighbors on how to address any concerns they have in a proactive manner.

I ask that the Board deny this appeal and allow Cisco Farms to operate as planned and as approved by the Planning Commission.

Respectfully,  
Jason Goforth

With full support,  
Matthew Goforth

**From:** Robert Wiele <r\_wiele@yahoo.com>  
**Sent:** Monday, January 16, 2023 8:44 PM  
**To:** COB  
**Subject:** Cisco Farms inc Cannabis Cultivation Facilities, PLN-2021-17384

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

Humboldt County Supervisors,

i am writing to express my opposition to the proposed Cisco grow in Petrolia ( PLN-2021-17384).

The character of the area has changed drastically over the past few years, and not for the better, due to the rapid influx of very large cannabis grows. These may add to the tax base of the county but have greatly degraded the quality of life for the majority our residents. Heavy truck traffic, wear and tear on our tiny dirt roads, dust, noise, light pollution, diesel generators at night, have all impacted the nature of our community.

The people who live in the vicinity of the proposed grow came here decades ago seeking the peace and quiet of a rural life. These are good people who don't deserve to have their life upended.

You cannot make an informed decision on this issue without at the very least coming to Petrolia and seeing the proposed sight and the impact it will have on those nearby. I urge you to deny this project, but if not, I hope you will at least postpone your decision until you have taken the time to come here and gain a real understanding of the consequences for the people in the surrounding area.

Respectfully,

Rob Wiele, Petrolia

To Kathy Hayes, Clerk of the Board

Re: Petrolia Chambers Road Residents and Landowners Appeal of Cisco Farms, Inc.  
#PLN-2021-17384

MLK Day; January 16, 2023

Dear Honorable Supervisors of Humboldt County,  
My name is Ali Freedlund and I have not written in regards to a concern or issue for a long time. I live and work in the town of Petrolia. I have been here since 1987. I support the appeal of Cisco Farms. I am not opposed to Cannabis permitting where it is appropriate. I am writing specifically because of the fragility of the road and sensitive receptors along Chambers Road before getting to the proposed project area, which is inappropriately large scale for the neighborhood and road.

I know this road intimately because of my work. I have supervised several fuels reduction and hazardous branch removal operations along this road since 2014, the most recent being in 2020. I was amazed at the neighborhood traffic along this road. We had to have traffic flaggers at two locations stop traffic. Not 15 minutes would go by all day long before we stopped cars and trucks. People going to school, lunch, the mailbox, to town and back. I was thoroughly surprised. In particular, there is a dangerous curve before a one-lane bridge over East Mill Creek. Visual safety is a red flag for this stretch. I cannot support more large truck and business traffic on this road in its present configuration.

The Mattole Union Elementary and Triple Junction High School are public schools that involve daily student, parent and teacher bicycle, pedestrian and vehicular traffic to and from school both along Mattole Road and Chambers Road. My grandchildren walk to the public school that is at the head of this road.

Even the main road, Mattole Road, does not have any, let alone adequate, safe pedestrian pathways for school children and community members. Chambers Road is even worse. Chambers Road is full of potholes and often reduced to one lane safe travel for several stretches BEFORE getting to the project area. Chambers Road also has one of the densest neighborhoods in the Petrolia area. There is literally no safe place to ride bikes or walk already! **I am in support of this appeal due to very poor road conditions in a highly congested area of our town.**

Below are a few photos

The first one shows a tight corner before the one-lane bridge.

The second one shows the condition of the roadside edge and the narrowness. Both shots are before the project area. I feel like before any such project is approved, a visit to this road, the school site and the neighborhood is essential!



Lastly, the cannabis industry is tanking! The current owner is approachable, but what happens when he sells the property? Please approve the appeal!.

Sincerely, Ali Freedlund, [ali.freedlund@gmail.com](mailto:ali.freedlund@gmail.com)

PO Box 1, Petrolia CA 95558



**From:** River Walker <riverwalker1111@gmail.com>  
**Sent:** Monday, January 16, 2023 9:46 PM  
**To:** COB  
**Subject:** Trish Stefanik PLN-2021-17384 1/24/23 BoS meeting

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

Hello Kathy Hayes and Board of Supervisors. Attached is the letter sent by my neighbor and long time Chambers Rd resident Trish Stefanik urging against the Cisco grow. It is stamped received in August '22 but was not acknowledged as far as we know so I'm resending a screenshot of it to be considered at the upcoming meeting 1/24/23.

9:38

◀ Gmail

🔒 humboldt.legistar.

Dear Mr. Johnson / Planning Dept.

Please do not approve project P  
Chambres Rd. can not take + does not  
canal's operation. Have you ever  
The upper end is especially bad, then  
graded it has become a narrow gra  
really believe Cisco's tanks will be  
water? It doesn't rain much here  
of rain years are over. The last several  
been so dry my well is nearly deple.  
what will it be like when Cisco et al  
the ground water? I am due west +  
across the dirt road from this +  
He already has a canal's opera  
Creek Rd. + its impact on me has +  
Benneman / Kilgore scene just south  
40 years i have slept outside all  
I greatly look forward to every  
Conklin Creek operation has come

**From:** kathrynradke@gmail.com  
**Sent:** Monday, January 16, 2023 10:16 PM  
**To:** COB  
**Cc:** Bohn, Rex; Madrone, Steve; Arroyo, Natalie; Bushnell, Michelle; Wilson, Mike  
**Subject:** comment for appeal of # PLN-2021-17384

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

16 January 2023

Re: appeal of the Humboldt County Planning Commission's 11-17-22 approval of the Conditional Use Permit for 5 acres of new cannabis cultivation, drying, processing, and propagation facilities by Cisco Farms Inc, on Chambers Road in Petrolia (Record # PLN-2021-17384).

Dear Humboldt County Supervisors,

I am writing to protest the approval by the planning commission of this conditional use permit. The application and associated environmental documents **do not at all address the cumulative impacts of this project on the Petrolia community.** I am the chair of the Board of Directors of the Mattole Valley Community Center, the secretary of the Board of Directors of the Mattole Valley Resource Center, and the overall coordinator of the Mattole Valley Neighborhood Emergency Services Teams (NEST) organization. The needs and vulnerabilities of the local community are therefore front and center for me much of the time, as for example during the month of earthquakes, flooding storms, and lengthy power outages since December 20, 2022.

Having the planning commission chair report that letters from the community submitted before the hearing were "supportive" was insulting beyond belief. Did he even read the letters? Why didn't staff correct him?

Here are some of my concerns about the proposed mega-project:

**The Chambers Road access to the project is not appropriate for a large-scale operation:**

**-The intersection of Mattole and Chambers Roads is right at the entrance to the Petrolia school grounds, across the Mattole Road from the community center, and at the top of the steep Crane Hill on the Mattole Road.** Vehicles consistently speed up Crane Hill and their drivers cannot see over the crest until they are very near the top where there's a crosswalk used by school kids as well as community members. **Many near-accidents have occurred at that intersection**, including narrow misses of kids or vehicles turning from Chambers onto Mattole Road, as well as close calls with wandering cows. Increased vehicular traffic through this intersection will increase these dangers immensely, especially when large trucks have to make the turn onto Chambers, because visibility is restricted by a grove of eucalyptus trees. Parents drop off and pick up their kids right there.

**-Workers at the proposed project are going to drive to the Petrolia store, food truck, and post office during the noon hour, when high school kids walk from the school to the store, increasing the chances of accidents.** Moreover, kids walk from home to school and back home along Chambers Road.

**-Chambers Road is the one-way exit to Mattole Road for residents during wildfires.** The marginal width of the road makes it questionable whether emergency vehicles can go up Chambers while passenger vehicles are driving out. **The one-lane bridge over Mill Creek is a bottleneck.** Visibility approaching the bridge from both directions is limited by blind curves, trees, and steep hills. Having up to 34 workers needing to exit the proposed

project in addition to other Chambers Road residents will only intensify the nightmare of getting people out during a fire.

**-The condition of Chambers Road is poor** – strings of “filled” potholes can be seen on the Google Maps satellite view. Large potholes and the broken road surface have not been repaired near the end of the county road portion of Chambers – that section has to be crawled through by vehicles. It is ludicrous to think that anyone could drive that section at 25-40 mph, as was reported to be the speed range for driving Chambers Road. In practice, the whole of Chambers has to be driven at 25 mph or less – mostly less.

**The increased number of cannabis workers will burden an already-stressed community.**

**-Housing.** If only 8 full-time workers will be housed on site, where are the other 4 full-time workers going to be housed? And where are the 22 peak season workers going to live? Housing is already severely limited in our area - many workers on existing operations commute daily from Ferndale/Eureka/Fortuna, etc. or live in substandard housing here.

**-Power.** PG&E has a waiting list for domestic power drops in the area; power delivery is already maxed out for Southern Humboldt for years. This project and associated housing will not be able to use PG&E power.

**-“Public” services.** Limited services such as internet access and public porta-potty toilets are being provided in Petrolia by the community center and the family resource center. Pumping costs for the toilets require constant fund-raising pleas to the community and most contributions are literally nickels and dimes. Many cannabis workers already in the area rely on these services and do not appear to contribute in any significant way to their costs. Using their cell phones over the internet is often their only source of contact outside the valley. The community center considers the ability to communicate outside the valley to be necessary for public safety and has assumed its cost, again raising the necessary funds. Sources of potable water are limited locally and no public laundry facilities exist. Garbage and recycling have to be disposed of by individuals.

**-Emergency services.** Petrolia is already stressed for sufficient personnel to provide emergency services for current residents. Another large increase in cannabis workers will lessen the ability of our volunteer EMTs and fire department members, as well as the ability of the entire community, to deal with medical emergencies, fires, earthquakes, winter storms, power outages and floods.

**-Traffic on the Wildcat (Mattole Road) between Ferndale and Petrolia.** Many workers on existing cannabis operations drive this road daily to work in Petrolia. Dangerous speeding, driving in the middle of the road, and driving on the wrong side around blind curves have increased markedly in the past several years. Large truck traffic that services the cannabis industry has taken a big toll on the pothole-filled road. That wear and tear will increase greatly to build and service the proposed project at the size and scale heedlessly approved by the planning commission.

Many stalwart community members in Petrolia have had it with the endless stream of approvals of large-scale cannabis operations, frequently as multiple operations run by essentially the same people. Enough is enough! Folks behind the desks need to come out here and spend some time looking carefully at what this has wrought. We do not need another mega-grow in Petrolia.

Sincerely,

Kathryn Radke

~~2025 Mendocino County~~ Petrolia

**From:** Alyssa Goforth <alyssagoforth37@gmail.com>  
**Sent:** Monday, January 16, 2023 10:43 PM  
**To:** COB  
**Subject:** Public Comment for 17384 appeal - Cisco Farms

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

I am writing in support of Cisco Farms (PLN-2021-17384) and asking the board to deny this appeal. I have lived on Chambers Rd. for 10 years now and have no concerns Cisco or his project will harm this community.

This project has been approved. It has followed all the rules and regulations set by the county and state. They are in compliance. Community members who do not agree with these rules and regulations should not have the authority to punish one individual or project based on their beliefs or opinions.

As far as housing is concerned, with the decline in the price of cannabis and more farms calling it quits, most people have chosen / forced to leave the valley and move to town because of lack of opportunity. Because of this, the availability of rentals seems to be pretty abundant.

I see some community members having concerns about the one lane bridge and traffic down Chambers Rd. This temporary bridge should be replaced with or without this project going forward. I walk and ride my bike down Chambers Rd. with my children and dogs and do not have concerns about any traffic this project may bring. My children go to the school. We all know each other. Land owners, workers and visitors have always slowed down when they see a pedestrian and I don't expect this to change with this project and their staff. This is a county road. Neighbors do not have the authority to determine who gets to drive down a county maintained road. Maybe with this project going forward we can actually use the tax dollars to fix Chambers Rd?!

Thank you,  
Alyssa Goforth

**From:** Craig Maclay <craigmaclay@gmail.com>  
**Sent:** Tuesday, January 17, 2023 8:07 AM  
**To:** COB  
**Subject:** Karl Benemans farm in Petrolia

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

Hi,

My name is Craig Maclay. I am writing today to advocate for Karl Benemans farm in Petrolia.

I am a property owner in Petrolia within a mile of Karl's project. I think that the benefit from allowing Karl's permit to go through would outweigh any negative impacts his project would have.

For example, I believe this farm would employ local people in Petrolia who have been hit hard by the economic downturn of the cannabis industry. There are many people looking for work in Petrolia now because of this and Karl's farm would employ some of them.

Another advantage would be the benefit of the workers he pays and Karl himself will then spend money in the community (at the grocery store, buying local soil, using local materials such as gravel to repair roads when necessary, etc.) Also, his farm is remote. He has enough space so that his neighbors will not feel a negative impact.

Finally, Karl is a member of the Petrolia community and has been his whole life. This gives him a vested interest in the community and the environment, assuring that he will keep the job site safe, clean, and will make sure to deal w any environmental protected to avoid pollution of any sort.

Thank you for your consideration,

Craig Maclay

**From:** Jackee Wright <jackee0628@gmail.com>  
**Sent:** Monday, January 16, 2023 3:45 PM  
**To:** Holtermann, Michael  
**Cc:** COB  
**Subject:** 17384 (letter of support)

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

Dearest Michael Holterman, & Humboldt County Planning Commission...

My name is Jackee Wright, and I am writing this letter of support for Cisco Bennamen's proposed Cannabis Farm on 1414 Chambers Road, Petrolia.  
(County Reference #PLN-2021-17384)

I have lived in Humboldt County my entire life, I was born here in Petrolia in 1971, and I have known Cisco since we were both small children.

Cisco is a local, also born in Petrolia in 1976. My property is just to the South of Cisco's, and I am in full support of his project. I believe his farm would supply some much needed employment opportunities in our small community, while simultaneously being out of view from his immediate neighbors.

I believe that it's shameful that some of the "locals" here in Petrolia have decided appeal his project, as some of them are permitted farmers themselves, and nearly all of them have profited from the Cannabis industry in one way or another over the last few decades....I feel it's hypocritical to put it nicely.

Cisco is a good person, a good neighbor, and a local who is trying to develop his property in the manner that he sees fit, all the while adhering to strict regulations set forth by County and State officials.

Sincerely,  
Jackee Wright

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100



**From:** Grass Hapa <grasshapa707@gmail.com>  
**Sent:** Monday, January 16, 2023 2:43 PM  
**To:** COB; Holtermann, Michael  
**Subject:** Regarding PLN-2021-17384

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

Mr Holtermann,

As a resident of Chambers road in Petrolia, I am in favor of the proposed project #2021-17384 at 1414 Chambers Road.

Mr Benemann has been a lifelong Petrolia resident and positive member of the community. I have discussed the project scope with him and it should be viewed as any other agriculture crop. His plan is to phase into this as market conditions allow. The site he has chosen is selected for reducing impact on viewshed.

Please approve this project. We need the economic benefits of an employer like Mr Benemann in our community.

Patrick Kanzler  
707-599-9197

[REDACTED]

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**From:** Kay Raplenovich <kaysraplenovich@gmail.com>  
**Sent:** Monday, January 16, 2023 12:55 PM  
**To:** Madrone, Steve; Arroyo, Natalie; Wilson, Mike; Bushnell, Michelle; Bohn, Rex; Holtermann, Michael; COB  
**Subject:** Cisco Farms  
**Attachments:** Cisco planning letter.doc

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

Humboldt County Board of Supervisors and other concerned parties,

Attached you will find a letter opposing the proposed Cisco Farms project. Please consider seriously the objections of those of us who will be directly affected by this industrial grow.

Thank you for your consideration,  
Kay Raplenovich

[REDACTED]  
Petrolia, CA 95558

[REDACTED]

**From:** Flora Brain <florabrain@gmail.com>  
**Sent:** Monday, January 16, 2023 2:00 PM  
**To:** COB; Bohn, Rex; Madrone, Steve; Arroyo, Natalie; Bushnell, Michelle; Wilson, Mike  
**Subject:** public comment re: PLN-2021-17384

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

Dear Rex, Steve, Natalie, Mike, and Michelle,

I am writing to express my concerns regarding the Planning Commission's November 17, 2022 approval of the Conditional Use Permit for 5 acres of new cannabis cultivation, drying, processing, and propagation facilities by Cisco Farms Inc, on Chambers Road in Petrolia, Record # PLN-2021-17384.

As a resident of downtown Petrolia with children attending Mattole Elementary School located on Chambers Road, and as a local citizen who is working hard on building resilience and sustainable economic transition in our community, I strongly oppose the development of new cannabis infrastructure at this scale in our rural community, and I specifically oppose any and all further approvals necessary for Cisco Farms Inc to proceed. My reasons are organized below:

- **Impacts to community safety, especially traffic safety around Mattole Elementary School and Triple Junction High School, located on Chambers Road:**
  - Petrolia lacks any sidewalks. My children and their neighbors walk or ride bicycles to school along Mattole Road and Chambers Road. Traffic safety is already a concern, such that residents continually seek ways to slow down traffic and ensure the safety of pedestrians and bicyclists. This proposed cannabis development would necessitate more large trucks and increased traffic, notably supply trucks from outside our community whose drivers are unfamiliar with our local roads, and this **threatens the safety of pedestrians and bicyclists** on both Chambers Road and Mattole Road, as those trucks and vehicles come in from Ferndale and Redway. This is a particular concern for me in downtown Petrolia, where my family lives.
  - The existing temporary 1-lane bridge across East Mill Creek, located approx. half a mile east of Mattole Elementary School, is approached via a blind curve from both directions. It is already a dangerous spot when drivers do not slow down appreciably. Increasing truck traffic through this location - as *will* happen should Cisco Farms, Inc. be allowed to develop as requested - will increase traffic hazards in this location. It is easy to imagine what could happen there in the event that a large supply truck collides with a smaller vehicle, pedestrian, or bicyclist at that location.
- **Undermining efforts to create a locally appropriate, ecologically and socially responsible cannabis industry in the Mattole Valley:**
  - Further development of large scale cannabis operations relying on light dep and mixed light undermine the efforts of small scale, locally appropriate cannabis farmers, businesses, and

coops, who are working hard on creating a viable cannabis industry that is ecologically and socially responsible. I support my small scale, full sun, responsible neighbors who are working towards a better cannabis industry future. They are the future that I and many local residents want. As such, I cannot support Cisco Farms, Inc.

- **Lack of enforcement of existing cannabis farms:**
  - I have approximately zero faith in Humboldt County's ability to enforce cannabis cultivation regulations at this time. I continually see permitted greenhouses with lights on after dark. I see grows that were permitted with the requirement to catch rainwater, operating with zero rainwater catchment infrastructure evident. I understand that Hum Co's enforcement is complaint-driven, and that will never work in a county and community that prizes "live and let live" and "never snitch" as their most dearly held code of ethics. As such, I have zero faith that large new permitted grows will be done to the letter of their permits. It is not happening now. This reality intersects with, and informs, the following objections:
- **Need to conserve and steward Mattole River water:**
  - There is a longstanding recognized need to conserve water in the Mattole River watershed, for both endangered salmon species as well as human use. Groundwater pumping affects water levels in tributaries, the river, neighbors' springs, and ultimately affects us all. I have zero faith that even if permitted to only catch and use stored rainwater, Cisco Farms Inc.'s operations will never use groundwater. See above point.
- **Need to protect dark skies:**
  - One of the most precious things we have here in the Mattole are dark skies – except when greenhouses light it up. Even permitted operations frequently keep their lights on after dark. This disrupts diurnal rhythms of nocturnal and crepuscular wildlife, and it irritates humans who enjoy dark skies. See above point re: lack of enforcement of existing cannabis farms.
- **What are we teaching our children?**
  - Right now, children in the lower Mattole Valley are working with their school and local community activists on a theatre production that centers around the need to reduce the use of plastics. Simultaneously, we as a community are working hard to create alternative futures for our children, futures beyond and outside of an outdated industrial cannabis industry that relies on industrial plastics, imported fertilizers, gas-powered generators, electric lights, stolen water. Approving yet another – the biggest yet – industrial cannabis operation in our community undermines all of our efforts to demonstrate to our kids that we are working creatively to forge a better future. We envision and work towards a future where our children make money by restoring salmon, restoring the health and productivity of this watershed, teaching and guiding others to visit our incredibly unique and biologically rich Lost Coast and Mattole ecoregion with respect and appreciation for its uniqueness. We envision a future where small scale locally appropriate and socially responsible farmers provide the highest quality cannabis to markets that value its production methods. We envision a future in which careful water stewardship results in enough water for wildlife and humans to coexist, and we make our livelihoods sharing these skills with others. In short, we envision a community and economies that steward and

give back to this land. We are sick and tired of resource-intensive resource extraction. It is time for something new, and we **are** creating it. Please do not hobble our efforts by approving more of the same industrial blight and resource extraction that has recently so deeply failed so many, and continues to fail our watershed during its last gasps. Please support us to do something so much better. Together, we can. Thank you for your dedication to our county's future.

Sincerely,

Flora Brain



Petrolia, CA 95558

**From:** joshua Pearlston <jpsurrender@gmail.com>  
**Sent:** Monday, January 16, 2023 2:23 PM  
**To:** Holtermann, Michael  
**Cc:** COB  
**Subject:** 17384

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

To who it mat concern i am righting in support of the preposed project. PLN-2021-17384. As a Humboldt county local and being born and raised in the Mattole valley next to the proposed project i can say with out a doubt that MR Bennemen will be a great neighbor and steward of the land . I have no doubt he will go above and beyond to address the community concerns and to do what is in the valleys best interest in a responsible manner. There is no one i would want more as a neighbor or land developer in my neighborhood. This is a traditionally agricultural valley I wish MR Bennemen all the best and know he will do great things with his future endeavors. Thank you for your time.

Sincerely,  
Joshua Pearlston

**From:** ebeltz@ebeltz.net  
**Sent:** Monday, January 16, 2023 2:32 PM  
**To:** COB  
**Subject:** Supervisors Hearing 01/24/23 Cisco Farms cannabis cultivation facilities (PLN-2021-17384)  
**Attachments:** Beltz, Ellin - Cisco Comment 082522 .pages.pdf

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

Regarding Supervisors Hearing 01/24/23 Cisco Farms cannabis cultivation facilities (PLN-2021-17384)

<https://ceqanet.opr.ca.gov/2022070433>

Dear Ms. Hayes:

It is not possible to reference the Meeting agenda Item number as this has not been posted yet despite your instructions saying the number is required.

I would like my comments to be available to the supervisors before the hearing. Please note this is a cover letter via email with a supporting document as a PDF attachment.

It is not possible to provide agenda item number before January 17, 2023 as the agenda has not been published, but the Public Hearing notice states January 17th is the deadline for comment and that the agenda item number must be provided. In an effort to not lose my comment, I am also emailing it to the supervisors directly due to this Catch-22.

Most sincerely yours,

Ellin Beltz  
ESCI, North Eastern Illinois University (retired professor)

University of Chicago (retired assistant lecturer)

  
Ferndale, California 95536

ebeltz@ebeltz.net

=====

rbohn@co.humboldt.ca.us

mbushnell@co.humboldt.ca.us

mike.wilson@co.humboldt.ca.us

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Regarding Re: Cisco Farms cannabis cultivation facilities (PLN-2021-17384)

<https://ceqanet.opr.ca.gov/2022070433>

Dear Supervisor:

Thank you for taking the time to review this prior to your hearing on the topic. I support legal cannabis but I can't support this project.

I commented on the EIR as directed on the State CEQA webpage (<https://ceqanet.opr.ca.gov/2022070433>), but my comments were not included in either the dEIR or the EIR reports to the Planning Commission. I do not know why, but I was prevented from commenting before, so I appreciate the opportunity to comment on the appeal. My original comment is attached to this email.



(A) I think Cisco's dream of being a "regional processing center" 30+ miles from US101 is silly. Every thing would have a 66 mile round trip just to 101 - let alone where all the bottles and packages would come from in the first place or where they would be shipped to after "processing." None of this was considered in the EIR.

(B) I think the project document is flawed because

- \* it is too large for the immediate area,
- \* it is too far from reasonable services (gas, electric, sewer, food, medical) and new electrical hookups are delayed until 2025 in the area by PG&E
- \* there is no reason to create long commutes to a remote rural area over the temperamental Mattole road,
- \* there is no reason to build substandard housing for farmworkers,
- \* there is no reason to create homelessness or transience in Petrolia where people are already struggling by at half the state average income,

(C) I think they should use one of the many other approved and permitted mega grow parcels all over Humboldt County which are for sale because their owners cannot make a living at current prices. Some examples include:

\* [https://www.realtor.com/realestateandhomes-detail/160-Acres-Fort-Stewart-Rd\\_Blocksburg\\_CA\\_95514\\_M91469-19291](https://www.realtor.com/realestateandhomes-detail/160-Acres-Fort-Stewart-Rd_Blocksburg_CA_95514_M91469-19291)

\* [https://www.realtor.com/realestateandhomes-detail/40-Sunset-Ridge-Rd\\_Blocksburg\\_CA\\_95514\\_M99075-94096](https://www.realtor.com/realestateandhomes-detail/40-Sunset-Ridge-Rd_Blocksburg_CA_95514_M99075-94096)

\* [https://www.realtor.com/realestateandhomes-detail/Reed-Mountain-Rd\\_Benbow\\_CA\\_95542\\_M93393-02532](https://www.realtor.com/realestateandhomes-detail/Reed-Mountain-Rd_Benbow_CA_95542_M93393-02532)

The closest to Chambers Road is [\\*https://www.homes.com/property/46145-mattole-rd-honeydew-ca/r227yp9f6v2vg/](https://www.homes.com/property/46145-mattole-rd-honeydew-ca/r227yp9f6v2vg/)

Described as "4540 sf Specialty MIXED LIGHT Tier 1 Cannabis Cultivation permit on 8.37 acres of PRIME AG soil. Expand to 10,000 sf or transfer with RRR program. This farm is ready to plant with infrastructure in place. Fully permitted 750 sf 2 bed one bath cabin with septic and PG&E on sight. Property borders the county road and has Mattole River frontage plus open pasture land. Private with no close neighbors however, general store is right across the bridge. Get your season started, call NOW! \$459,000

(D) I think the county should spend time collecting grow taxes from the four or five largest growers we have now before adding any more giant grows to the tax rolls.

(E) I think we should let the voters have their say on the ballot initiative before approving more off-grid mega-grows with flawed environmental documents, piecemealed CEQA as well as significant neighbor and local opposition.

(F) And finally, even though Humboldt County is synonymous with growing Cannabis, I think approving another mega-grow makes the market worse for the rest of your constituents who are growers - and the general economy worse for all of us.

I truly hope you will consider the overall situation instead of just accepting another cannabis mega-grow.

Most sincerely yours,

Ellin Beltz  
ESCI, North Eastern Illinois University (retired professor)

University of Chicago (retired assistant lecturer)

  
Ferndale, California 95536

ebeltz@ebeltz.net

Michael Holterman  
Humboldt County Planning Dept.  
[mholterman@co.humboldt.ca.us](mailto:mholterman@co.humboldt.ca.us)

Re: Cisco Farms cannabis cultivation facilities (PLN-2021-17384)

Dear Mr. Holterman:

At the outset, let me state my support for Cannabis growing activities and that I voted for the proposition which legalized it in California. I am a retired Earth Science University Lecturer who taught 300 level courses as well as “rocks for jocks” and “dinos for winos” at North Eastern Illinois University. I retired to Humboldt County in 2001 and came out of retirement to teach Geology for College of the Redwoods at Hoopa for one year.

Since 2001 I have spent significant time in the Petrolia, Honeydew and Ferndale areas and am aware of local environmental issues.

Scope:

This is my written comment on the proposed Cisco Farms cannabis cultivation facilities (PLN-2021-17384), in particular the “CEQA Initial Study and Mitigated Negative Declaration” (Initial Study) and related documents located at <https://ceqanet.opr.ca.gov/2022070433> which is for a conditional use permit for 5 acres of new cannabis cultivation, 67,760 square feet of nursery, 3,000 sf “commercial processing, 19,200 sf drying & storage on 517 acre parcel. The project will be irrigated via rain catchment and tank storage. A groundwater well will be used for non-irrigation. Farmworker housing will be provided in four modular units. 12 employees year-round and an additional 22 at peak season. Power to be provided by PG&E and on-site solar. The Proposed Project site is located approximately 1 mile east of the community of Petrolia off of Chambers Road, a county-maintained, Category 4 road to the property gate.

Comments:

While CEQA says that Aesthetics will be considered, none were addressed in the document.

The addition of large areas with reflective “gutter to gutter” plastic hoop houses would seem to affect Aesthetics, as will night “security” lighting, potential generator lighting for cultivation, addition of four “pod” homes (no pictures provided) and a giant set of buildings for drying, processing and packaging. No images were provided of the potential appearance of these structures.

While the document says this is grassland, there is no mention of Coastal Terrace Prairie habitat - if their consultants looked for it, it's not mentioned.

I saw no analysis of Greenhouse Gas Emissions associated with the transformation of ranch land to Commercial production, packaging, processing and/or residential use. Without analysis there can be no mitigation, therefore one cannot say there is no impact.

The population estimate of 1,000 residents used in the document is from the Humboldt County Website which is incorrect (<https://humboldt.gov/739/Petrolia>). There is no source given on the Humboldt website for this vastly inflated population figure.

U.S. Census (<https://www.census.gov/quickfacts/humboldtcountycalifornia>) says that “The population in Petrolia (zip 95558) is 435.” Since 2020, it has had a population growth of 2.6%, approximately five people a year. The median income is \$36,000 with a 6.7% unemployment rate (<https://www.bestplaces.net/people/zip-code/california/petrolia>). Without explanation or source, the Humboldt County website claims a population of 1,000 for the same area (<https://humboldt.gov/739/Petrolia>). The same pattern continues for Honeydew: The Census says 112 (<https://www.bestplaces.net/people/zip-code/california/honeydew/95545>), the County says 400 (<https://humboldt.gov/727/Honeydew>) a four to one increase. Therefore the 1000 listed by the county is not “Petrolia plus Honeydew” which would be 635, but some other completely unsourced number.

Using only the U.S. official Census Petrolia numbers, the addition of 34 employees would exceed the average population growth in the area by six times if they all arrive at the same time. If only 8 stay full time, that's still almost twice the usual population growth in the area - for only one parcel. This is a significant increase when they will be housed in sub-standard conditions. The actual percentage would be 1.83% not 0.4 % as stated on page 80 ([https://files.ceqanet.opr.ca.gov/280363-1/attachment/aJG5RCIysIDFPHPi2lunRSxB4uyt8DbQAAYr0PxMkQrS8T\\_dXf7S1IrxblsyH6YnsrRL0XiR23ha6EMb0](https://files.ceqanet.opr.ca.gov/280363-1/attachment/aJG5RCIysIDFPHPi2lunRSxB4uyt8DbQAAYr0PxMkQrS8T_dXf7S1IrxblsyH6YnsrRL0XiR23ha6EMb0))

On the same page, the document claims that no replacement housing will be needed but simply does not address where the up to 34 employees are supposed to live, if the project site will only accommodate eight and the "site caretaker." This project has the potential to displace twenty-six bed-units in Petrolia, I don't think it's correct to say there is no impact in this regard and to propose no mitigation measures.

Note that on page 83 the labor is considered to be "contract labor" not employees and they claim that 22 more will not significantly increase the population, and most would live in the Petrolia area. However there are no empty units of housing available in Petrolia - so displacement or doubling up would have to occur for this part of the document to be accurate. And they said there is no impact on page 82.

Page 83 also calls for Security Lighting but fails to address the "Dark Skies Initiative." The increase in ambient light may cause problems for species not even mentioned in this document such as purple-crowned night herons and marbled murrelets, hoary bats, Townsend's long-eared bats and other species which are not accustomed to light at night. However the document fails to analyze this.

Page 84 says "Would not substantially increase the population..." which seems to be inaccurate due to their use of 1,000 residents which is 60% over estimated, therefore this section is incorrectly analyzed.

Page 86 claims the driving distance to Ferndale is "approximately 30 miles" when every sign says 33 from Ferndale to Petrolia, and 1.5 miles more to Cisco. Therefore 34 miles. These kinds of "small errors" add up in this document when "fact" after "fact" turns out to be "slightly wrong," "partially incorrect," or just not true - leading to the reasonable assumption that other "facts" are also alternative.

Page 87 suggests a set of figures for transportation but neglects to say that the traffic is sharing the road with grade school children and families on essentially a one-lane road. Long-term 54 trips a day on a road currently with 25 residents seems to be at least a doubling of traffic and it would seem to be needful of changes to the road to safely drive past the grade school 54 times a day.

Page 88 references something not mentioned at all elsewhere "Additionally, the Proposed Project would also serve as a Community Support Facility for the surrounding Petrolia and Honeydew areas, supporting nearby farms who could now utilize the processing and nursery services proposed in this project rather than

traveling to a larger metropolis area (e.g., Eureka or Garberville), subsequently reducing vehicle trips”

Does this project see itself as a central processing location? If so, what truck trips would be added to the 54 maximum per day if this happened? This was not addressed in this document. If this is the intent, but no analysis was performed. This results in piece-mealing, where scope creep advances the project from “just a grow” to “a grow with processing” to a “regional processing center” without analyzing the impacts of the slowly enlarging project footprint.

Page 88 “Therefore, it is not expected for the Proposed Project to have a potentially significant level of vehicle miles traveled (VMT) and impacts related to CEQA Guidelines section 15064.3 subdivision (b) would be less than significant.” The document fails to analyze the 69 miles round trip minimum per car per day per employee which while not incredibly longer than average California commute in mileage, is nearly double that of the average in time.

California has an average of 29.3 minutes of one-way travel to work - approximately one hour a day driving. The nearest town of any size to Petrolia, is Ferndale which is about 1 hour away by road which would result in a minimum two hours per day commuting time which is double the average California time of commute (<https://getjerry.com/insights/which-states-have-longest-commutes>).

Causing up to 30 people to commute two hours a day is not in line with our Greenhouse Gas goals for Humboldt County and there is no mitigation proposed in the document to offset the new car trips for the workers.

There is no mitigation of the truck trips required in or out of the project - either for construction or operation. Chambers Road is a small road. The intersection of Chambers & Mattole has the school and community center - neither of which is referenced in the CISCO document. Big trucks and small children on 1 lane roads don't mix. This is not addressed in the document.

One of my greatest concerns is the inhumane standards proposed for worker housing and the potential to increase Homelessness in Petrolia and Humboldt County.

Quoting "CALIFORNIA STATE HOUSING LAW CALIFORNIA HEALTH AND SAFETY CODE DIVISION 13, PART 1.5. REGULATION OF BUILDINGS USED FOR HUMAN HABITATION Complete"

Official version at [www.hcd.ca.gov/codes/shl/SHLStatutes.htm](http://www.hcd.ca.gov/codes/shl/SHLStatutes.htm)

"§ 17920.3. Substandard Building Any building or portion thereof including any dwelling unit, guest room or suite of rooms, or the premises on which the same is located, in which there exists any of the following listed conditions to an extent that endangers the life, limb, health, property, safety, or welfare of the public or the occupants thereof shall be deemed and hereby is declared to be a substandard building: (a) Inadequate sanitation shall include, but not be limited to, the following: (1) Lack of, or improper water closet, lavatory, or bathtub or shower in a dwelling unit... (5) Lack of hot and cold running water to plumbing fixtures in a dwelling unit. (6) Lack of adequate heating. (7) Lack of, or improper operation of required ventilating equipment. (8) Lack of minimum amounts of natural light and ventilation required by this code. (9) Room and space dimensions less than required by this code. (10) Lack of required electrical lighting. (11) Dampness of habitable rooms."

[https://nchh.org/resource-library/HH\\_Codes\\_CA\\_9-9-07.pdf](https://nchh.org/resource-library/HH_Codes_CA_9-9-07.pdf)

None of these are addressed in this document where four pods are to be sufficient for up to 34 workers. The project doesn't include sanitary sewer, septic, potable water or electrical light until after the buildings are built when solar might be put on the roofs. The only septic existing onsite is associated with existing 1,900 square foot residence. Supposedly there will be an "associated onsite wastewater treatment system installed" at some point in the future. Farmworkers and contractors will be expected to use Porta-Potties, but those truck trips do not seem to be included in the trip estimates. Farm-workers using Porta-Potties is not the goal of the Housing Laws of the State of California. Human housing requires actual amenities, none of which are extant on this property and some of which will not be complete prior to the initiation of cannabis growing activities according to this document. Nowhere is the architecture of the "pod" specified to contain bathrooms, showers, or other required facilities.

PG&E is stated to do 600-amp hookup to the project in 2026, but the project expects to be running in 2022-2023 without electrical hookup. Since the solar is proposed to go on top of the buildings it is unclear how they will obtain power.

If Generators are expected to fulfill electrical requirements for the builders & workers, it is not stated clearly how this will be mitigated as there are currently no generators running on the property at all, any generator use would be automatic 100% increase.

The nearest supply of diesel fuel is 40 miles away at Fernbridge.

If workers are to be kept in substandard housing, it would seem to be against the law to approve the project as the housing standards are not met for adequate

maintenance of human beings. Rainwater is not enough to provide 40 gallons per day per person (stated that will be provided) when usually 50 gallons per day per person is considered a hardship. In the US, the average is 80 to 100 gallons per person per day of water (<https://www.usgs.gov/special-topics/water-science-school/science/water-qa-how-much-water-do-i-use-home-each-day> & <https://www.epa.gov/watersense/statistics-and-facts>). The Cisco document says their workers will be offered 40 to 50% of the average daily water used by every other American but does not say why this would be acceptable to their workers, the county or the state. The document does not say that their drinking water well will be drilled prior to construction, nor that they will be shipping potable water to the site.

Other things the onsite workers will not have are

- (a) Electricity - earliest electric from PG&E is 2026, earliest from project is “after buildings are built” as solar goes on roofs after the buildout
- (b) Hot water - no power (see a)
- (c) Access to grocery store/restaurant. Nearest is Ferndale 33 miles (one hour) north. There is a bodega at the Petrolia Post Office, but not an actual grocery store.
- (d) Access to medical. Nearest is Fortuna, 38 miles (1.25 hours) north.
- (e) Access to gasoline. Nearest is Ferndale, next nearest is Fernbridge, 40 miles to the north.
- (f) Access to public transport. Nearest is Fortuna.

This does not seem humane to create these conditions for human occupancy by government permit.

Page 93 says “The project would not require or result in the relocation or construction of new or expanded water..... electric power... which could cause significant environmental effects.” However on same page it says that eventually a drinking water well would be drilled and some form of septic field constructed - but without any additional data on either one brushes off any environmental effect from either one. Their commercial center apparently is planned to have a bathroom with shower and hot and cold water. Perhaps the farmworkers are supposed to shower in the break room instead of in their housing?

#### Mandatory findings of Significance

This document fails at Item b in 3.2.21 Mandatory Findings of Significance, page 100 because there is no statement that the Cisco proposed project would produce more cannabis than all the prior permitted operations shown on their page 24 map -



combined. I think it's not a good representation to color in all the neighbors as "cannabis grows" when they're 10,000 foot "ma and pa" grows instead of a mega-grow as proposed by Cisco.

The document fails to mention what is the extent and scope of what they call "packaging." Is that drying weed in a barn, butane extraction, fractionating towers or giant freezers? Is that dry weed being put in thousands of glass bottles all shipped to and from Petrolia? What exactly is "processing" and what kind of facility will it require? This also creates more truck traffic as all packaging materials would have to be shipped up the Wildcat or down Mattole road, minimum 30 miles from the freeway. Once a goal of being the commercial processing center for "the area" is mentioned (page 88), but the document doesn't include any impacts that would be created by that dream - which would seem to be substantial and significant were they to occur but they are not mentioned.

Mandatory Finding of Significance should include the effect on the State-wide Cannabis Market due to mega-grows. Glass House Brands (5.5 million square feet) is at present the largest permitted single grow in California (<https://www.forbes.com/sites/ajherrington/2022/03/22/glass-house-brands-opens-massive-new-cannabis-cultivation-facility/?sh=333d6d298cc8>). The facility formerly grew tomatoes but has been converted to Cannabis cultivation (<https://www.pacbiztimes.com/2021/08/04/houwelings-tomatoes-will-become-states-biggest-cannabis-greenhouse/>). Even with 5.5 million square feet, Glass House is not the largest. That honor belongs to Lowell Farms which grows, packages and distributes the largest amount of packaged flower per unit volume in the state for 2021 (<https://www.newcannabisventures.com/lowell-farms-takes-the-lead-as-californias-largest-seller-of-packaged-cannabis-flower-per-headset>).

During the time that Glass House and Lowell and thousand of others have been increasing market share, the price of a pound of cannabis has dropped from \$1,500 to about \$300 dollars, clearly showing the impact of market saturation. Glass House is growing indoor weed at price very close to outdoor sun-grown weed. Their facility is right on major transportation and they have no labor shortage. There seems no reason to build out 5.5 acres in the middle of nowhere when the competition is growing on 5.5 million square feet within spitting distance of the freeway.

*The Economist* wrote: "In California, the world's largest legal weed market is going up in smoke. The state's pot industry hopes federal legalization will help. It

may instead be its death knell.” (<https://www.economist.com/united-states/2022/05/14/in-california-the-worlds-largest-legal-weed-market-is-going-up-in-smoke>)

And finally, citizens are working to get a ballot initiative in Humboldt which would limit grows to the original 10,000 square feet “ma and pa” concept (<https://cannabisinitiative.org/> & <https://www.yournec.org/citizens-seek-more-voice-through-cannabis-reform-initiative/>)

In conclusion:

I think this document is flawed in analysis as stated previously and specifically in being too large for the area, too far from reasonable services (gas, electric, sewer, food, medical) and there being no particular reason to develop a mega-grow in this particular area there being no shortage of land closer to transportation and services which could be utilized for this project.


I am very concerned about building substandard housing for farmworkers and creating long commutes and/or potential homelessness in Petrolia where people are already struggling by at half the state average income.

I think Cisco’s dream of being a “regional processing center” 30-plus miles from the freeway is silly since every processing item, package, box, tape, sticker, vape cart or rosin bottle would have to be shipped 33 miles out and 33 miles back just to 101 - let alone where all the bottles and packages would come from in the first place nor where they would be shipped to after “processing.”

I think the county should spend time collecting grow taxes from the four or five largest growers we have now before adding any more giant grows to the tax rolls.

I also think we should let the voters have their say on the ballot initiative before approving more off-grid mega-grows with flawed environmental documents, piece-mealed CEQA as well as significant neighbor and local opposition.

Most sincerely yours,

Ellin Beltz  
ESCI, North Eastern Illinois University (retired)  
  
Ferndale, California

**Demico, T**

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**From:** Craig Clark <capfate@yahoo.com>  
**Sent:** Monday, January 16, 2023 8:25 AM  
**To:** COB  
**Subject:** PLN-2021-+7384. Appeal

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

The planning commission needs to stop approving acre size greenhouses. 10000 sq. ft. is sufficient for 5 acres open air in ground. More than that and a processing facility for the 5 acres would negatively affect all the neighbors along Chambers road. The road is not safe for the traffic that uses the road already, and this would multiply the traffic. To widen the road would negatively affect people living along the road. I live on an adjacent property and the increase in traffic will make my life a living hell. I am all for cannabis but this will destroy a neighborhood without creating any prosperity for anyone.

The planning department needs to look at traffic before approving projects.

Thank you,

Craig B. Clark

**[REDACTED]**

**[REDACTED]**

Petrolia, CA 95558-0149

Sent from Yahoo Mail on Android

1

2

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**From:** Dave Grant <mattolecraftsman@gmail.com>  
**Sent:** Monday, January 16, 2023 9:41 AM  
**To:** COB  
**Subject:** Cisco Farm PLN 2021-17384 CUP

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David Grant  
[REDACTED]

Petrolia, CA

Cisco Farm  
PLN-2021-17384 CUP

Rex Bohn  
Michelle Bushnell  
Mike Wilson  
Virginia Bass  
Steve Madrone

by email

Dear Humboldt County Board of Supervisors,

I am writing today concerning the proposed Cisco Farm in Petrolia. I have lived on Chambers road since 2006, Petrolia since 1996. There are some important points I would like to bring to your attention.

- The size of this farm is out of scale for Petrolia's small town cottage industries
- The impact to the neighborhood
- The road access
- School zone
- Employee housing and commute
- Availability of power
- Diversion of Water
- Resale possibility
- Williamson Act and the preservation of a natural landscape

The scale and size of this project does not belong in the small village of Petrolia. There are only a handful of neighborhoods in the area; Downtown, Old Coast Wagon Road, Evergreen, Conklin Creek, and Chambers Road. This will definitely negatively impact the surrounding neighborhood and our community.

Chambers Road currently is a side road off of the Mattole Road, it is a peaceful road with not much traffic at all. It is a favorite road for people wanting to take a walk or a run off the busier Mattole Road. The Mattole Valley Community Center, the Mattole Elementary and Triple Junction high school is at the beginning of this road. It is a popular route, especially for mothers and babies in strollers. It is also a favorite walk for students, teachers and administration. I often see a line of kids, usually walking in pairs, followed by a teacher and principal. They enjoy walking to East Mill Creek and back, as a way to take a break from sitting at a desk most of the day.

Chambers Road is barely a two lane road. There is definitely a bottle neck at the school. In fact it is impossible for two vehicles to pass at the east end of the campus. It narrows again at East Mill Creek where a temporary one lane bridge crosses. After this point it narrows once again after climbing the hill. Then, some very narrow spots where two vehicles can not pass each other without one pulling off the roadway onto the shoulder. It usually isn't a problem but with all the new traffic it will be.

Chambers Road is a quiet road, the loudest vehicles that drive down this road are the big diesel trucks often driven by the growers, often pulling trailers that make all kinds of racket as they bounce down the road. I can tell you the loudest one of them is owned by the applicant of this permit. I can't imagine people feeling safe walking down this quaint road with the addition of this mega grow with all the employees, the equipment that will have to be driven down our road, the transport of products, the dump trucks with imported soil, and more.

Housing is an issue in Petrolia, there just isn't any. People are always looking for somewhere to live. Often temporary workers sleep in vans and now the community center has had to install two porta potties to keep people from pooping in the bushes. Four modular homes can not solve this problem. I'm sure some of these employees might actually live in the valley but I can imagine most do not and encouraging employees to commute from out of the area just doesn't fall in line with Humboldt Counties goal of being more energy efficient. Efforts to reduce vehicle miles traveled (VMT) are critical to a secure energy future with respect to transportation fuels, and this can primarily be addressed through wise land use planning.

Energy is another resource Petrolia does not have. The Cisco Farm document states that PG&E might have power by 2026. PG&E has told a neighboring farm that a power update can not possibly happen that soon. Why would PG&E invest in new infrastructure that is meant to power a failing industry? See the August 21, 2022 Washington Post article by Scott Wilson - "The casualties of California legalizing pot: Growers who went legal." If construction begins in 2022 or 2023 where will that power be coming from for the years of construction that will be taking place if this project is approved?

It is hard for me to imagine this huge operation will be watered from rain water storage only. Evaporation from the pond is estimated at zero for October through April (Table 2 in the Operations Plan), which cannot be correct. Significant evaporation will also occur from roof-tops, a source for the rain catchment. During intense rain, the gutters may overflow. The formula given at p. 9 in the Operations Plan does not account for this, nor does it account for water lost to leaks, etc. Similarly, the efficiency of roof-top water collection is over-estimated at 100%. The efficiency of rain catchment systems is commonly estimated at 75%. This overestimate matters, because it implies that the collection system will not meet the estimated demand in some dry years. In the beginning phases these structures won't even exist and surely they will be growing crops supposedly irrigated from rain catchment sources. The claim that this project will not affect the surrounding forks of East Mill Creek is also hard to believe.

A concern that I have, as well as many neighbors I have talked to, is the possible resale of this property once this permit has been approved. With a collapsing market it may not be feasible for the current applicant to pull off this size of an operation. However a larger entity could come in, buy the property and run this overly scaled operation without any concerns for the neighbors and community members of Petrolia. The current applicant has said he has no intention of actually growing this much weed so why then apply for a farm of this magnitude located at the end of the road, 35 miles from the nearest interstate, down a quiet corridor in a rural area when fuel prices are at a record high and price per pound of marijuana at a record low.

The last point that disgusts me is that this property is under the Williamson Act. My understanding is that this California law provides relief of property tax to owners of farmland and open-space land in exchange for an agreement that the land will not be developed or otherwise converted to another use. The motivation for the Williamson Act is to promote voluntary land conservation, particularly farmland conservation. To me this isn't about farmland, it is an industrial sized operation that will use a tremendous amount of electricity, propane, fossil fuel, water, concrete and materials for large

buildings and turn a quiet road into a heavily used transportation corridor through one of the few densely populated neighborhoods in the Petrolia area.

The claim on page 24 that the proposed Cisco Farm is already surrounded by cannabis farms is misleading. It shows parcels shaded in green as if the entire parcel was a large grow. When in fact, these are mostly 10,000 square foot grows and if these were all added up together the total amount would still be significantly smaller than the proposed Cisco Farm.

Thank you.

Sincerely,

David G. Grant

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dave.grant  
petrolia.ca



Lost Coast Ranch®

[REDACTED], Petrolia, CA 95558

**RE: PLN-2021-17384**

December 14, 2022

To the Humboldt County Supervisors:

The application reference above lies a few miles from my ranch, but I am very familiar with the property and its ecological and community values. I have known Karl Cisco Benemann since he was a boy and have always found him to be a good and thrifty steward of the land and his resources. I don't doubt his word as he has never gone back on it in any dealings we have had over the past decades.

The problem before the Supervisors does not allow you to promote community values in regard to land use. You are hamstrung by misguided ordinances and regulations that have been adopted since legalization. A case in point was revealed in this week's hearing on the old SPI millsite. In the process of demonizing cannabis, you threw everything but the kitchen sink into the cannabis ordinances and then set up impossibly high fees and permit requirements meant to throttle the cannabis effort. It was mean spirited and the negative consequences have been swift to fall upon us, the citizens (both pro and con-cannabis). The fact that a referendum has been successfully filed to re-do the cannabis regulations so that communities are not overwhelmed by the industrial structure you imposed is a sign that all is not well.

You can strictly follow or interpret existing rules and regulations and feel you have done your duty to the citizens of Humboldt County. That would continue the poor practice that has negatively impacted the county. Adhering to what is widely considered a disruptive framework of rules will not produce the kind of planning that ensures community well-being. That horse has left the barn and you need to re-craft the playing field for cannabis so that the small mom-and-pops are protected from the mass commodity grows that demean the Humboldt brand and crush the growers who developed the Humboldt reputation.

This 5 acre project is located on a ranch of roughly 1000 acres. It's putting some agricultural land to an agricultural use. I am not against landowners doing what they want with their property as long as the impacts do not leave the property and as long as the public trust values are not negatively impacted. I do believe that neighbors should be considered if a project is within their view- or earshot. Neighbors should not hold veto power over development. This project should reach accommodation with the neighbors in regard to those two aspects. I believe the Supervisors have a role to play in mediating any conflicts.

\*

Mr. Benemann has told me that he will screen his flat from the neighbors to meet their visual concerns.





In regard to the concern about increased traffic, we need to consider all the possible uses of the ranch and realize that some uses need labor to run the operations. It may not be on a daily basis, but there are times and seasons when hired help is needed. That's going to increase traffic. If the land were subdivided into residences, it would increase the traffic far more. If the land were used for intensive vegetable production, it would increase traffic. Any activity above simple residential use by the owner is going to increase traffic.

In addressing traffic, the county has an obligation to upgrade Chambers Road. It's in terrible shape from the school on out. The bridge over East Mill Creek is temporary. The approach to the bridge is temporary. The county is responsible for impacts of road use, not individual landowners. It is not a private road. By approving any development on Chambers Road, the county needs to up its maintenance as its part in economic development and promotion of public safety. The onerous should not be on the applicant for a cannabis permit.

\*

My opinion is that plastic greenhouses are an abomination. They use precious resources with a short useful life and toxic consequences as life-destroying waste when that life is over. The Supervisors are not looking long-term enough when it approves their use. And allowing for exhaust fans is likewise a terrible idea. Ventilation can be accomplished through venting the crown. It might be more expensive, but it is quiet, passive and needs no electrical inputs. If that requires glass and substantial greenhouses, that's an investment required to be environmentally and community responsible.

Similarly, no light should escape the facilities such that it causes light pollution. Period.


I applaud Mr. Benemann for planning to grow cannabis outdoors, open field, in the sun. I also am heartened that there will rain-catchment or winter diversion storage ponds in his operation and no water draws from either above or below ground sources during the growing season. That scarce water is needed for fish and wildlife. This is as it should be.

The County of Humboldt has made many mistakes in crafting ordinances and applying them to Cannabis permitting. The permitting of pumping ground water during the dry months county wide must stop and you should insist on rain catchment systems. This has proven effective in the Mattole headwaters and the Sanctuary Forest initiatives are being copied state wide. You must not permit operations to run on fossil fuel generators –both now or at some future date. You should ban the use of fans and plastic, temporary (less than 25 year lifespan) greenhouses. Following these guidelines, I believe we can have a stable cannabis agriculture with far fewer impacts than what the county has permitted in the past.

Sincerely Yours,

*Michael Evenson*

Lost Coast Ranch®

  
Petrolia, CA 95558

1942-1943

**From:** Michael Evenson <evenson@igc.org>  
**Sent:** Monday, January 16, 2023 9:04 AM  
**To:** COB; Madrone, Steve; Bohn, Rex; Wilson, Mike; Bushnell, Michelle; Arroyo, Natalie  
**Subject:** RE: PLN-2021-17384  
**Attachments:** Cisco\_PLN-2021-17384.docx

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

Dear Supervisors,

I sent the attached letter December 14th when this application was first up for consideration. I would like to submit it for the hearing set for January 24th with the following added to my concerns.

In the past month we have experienced wind driven storms. While to some they are extraordinary, to those of us who've been here a while they are well within the range of variability of what we expect for the season. The high winds have shredded many greenhouses in the Mattole Valley. The particles of plastic are now distributed far and wide. They will impact our soils and water for years as they break down into smaller and smaller sizes. As we are learning from recent scientific findings, it is no joke that we will be living with them for generations. They inhabit our body tissues on a molecular level.

These winds lead me to emphasize the point I articulated in the attached letter that you must ban the use of plastic covered greenhouses NOW and for evermore. You must amend any ordinances that permit them and require greenhouses to be of more substantial materials. Better yet, for both the environment and economic future of Humboldt's once unique cannabis market, you should require all cannabis to be grown in the sun and in the open field.

Many Thanks for Your Consideration,  
Michael

**Michael Evenson**  
*Lost Coast Ranch*®  
*Petrolia, California*