

To: Humboldt County Planning Commission
From: Bonnie Blackberry
Date: July 7, 2022

RE: Item I, 1 Department Report: Small Cultivation Site Propagation Policy

Members of the Commission,

The following are my comments regarding expanding the propagation area as well as other issues that need consideration.

1. If there is a proposal to change the allowable square footage for ancillary propagation, it should go through a public process to amend the ordinance. This should be done at the same time as other ordinance issues that need review. (see below for suggested items)
2. When the ordinance was originally approved, the existing cannabis cultivation "farms" were already doing their propagation and genetic experimentation within their "existing cultivation area(s)". Granting a 10% bonus area for ancillary propagation is already an expansion that goes beyond what was actually existing and considered when forming the ordinance.
3. No on all three Options, especially Option 3, which suggest an option for all farms no matter the size.
4. Other suggested Ordinance clarifications, and improvements:
 - a. Amend and clarify definitions of outdoor and mixed light to correspond with the state definitions. Humboldt defines light deprivation as, "outdoor", whereas the state considers light deprivation as, "Tier 1 mixed light ". There is a big difference between what is commonly considered as outdoor full sun and using plastic hoop-house and greenhouse covers to manipulate the light to produce multiple crops, and is commonly called light deprivation. Defining an operation as Outdoor, when it is actually Light Deprivation is misleading.
 - b. Outline penalty structure for specific non-conformance violations, such as failure to shield green house lights, trucking water, and other permit conditions violations, so that there is a clear understanding of the consequences.
 - c. Allow no notice inspections for permit holders who have a record of violations and or neighbor/community complaints.
 - d. Clarify amount of generator use allowed under the ordinance that states that the "energy source must be exclusively renewable". Also if generator use is being allowed under the, "energy source must be exclusively renewable" provision, then the wording needs to be amended to clarify and reflect what is meant by "exclusively renewable".

Thank you for your consideration.

Respectfully submitted,

Bonnie Blackberry

