

McClenagan, Laura

From: Jeff and Marisa St John <upperredwoodcreek@gmail.com>
Sent: Wednesday, October 20, 2021 4:47 AM
To: Planning Clerk
Cc: marruffom@lacoassociates.com; Ford, John
Subject: October 21 Planning Commission Public Comments

Hello,

Please consider these Public Comments in the decisions that you make in your Planning Commission October 21 meeting:

Do not approve new cannabis grows or additions to existing ones (12333, 11786, 16774) for these reasons:

1. The County is in a drought
2. The County recently added \$1M for cannabis grant's because current growers say that their businesses are in crisis due to falling prices
3. The County is not tallying estimated water usage, acreage, etc. so there is no way to analyze cumulative impact to communities or watersheds.

Do not reduce setbacks to the Public Lands (12333, 13037, 21-11892), instead have applicants revise their plans to stay within the setback requirement.

Do not allow work within Work Within Streamside Management Area (21-12125 and 11503), instead have applicants revise their plans to work outside that area.

Deny 21-12310 Redwood Valley Farms (Titlow Hill) cannabis application - following reasons:

1. Inadequate Access - Road from Highway 299 to and through Sabertooth Rd does not meet or exede Category 4 requirements (as stated by both the Private Contractor's December 2018 Road Evaluation and the County's that was completed in April 2018 for the proposed Titlow Hill Subdivision).
 - 1.1 Staff Report states that "The site is located on road (insert - Sabertooth) that has been certified to safely accommodate the amount of traffic generated by the proposed cannabis cultivation." However, the Private Contractor who did the certification manually counted cars in January (when there is no or very low cannabis activity) to derive the Average Daily Traffic.
 - 1.2 The Private Contractor did not certify that the road from Highway 299, nor the second access point (the rest of Sabertooth Road to Titlow Hill) which is required by CalFire (refer to the proposed Titlow Hill Subdivision documentation).
2. The Water Resource Protection Plan was performed in 2016 - Significant drought impacts have been identified since then so that plan might no longer be valid.
3. No Road Maintenance Association has been created in accordance to Ord 2599 CCLUO [Inland] states that "Where three or more permit applications have been filed for Commercial Cannabis Activities on parcels served by the same shared private road system, the owner of each property must consent to join or establish the appropriate Road Maintenance Association (RMA) ***prior*** (emphasis added) to operation or provisional permit approval." The County's Permitting System shows three cannabis applications for Sabertooth (Saber Tooth) Rd (316-174-010, 316-172-020, and 316-174-008).
4. There is no analysis of the Vehicle Miles Traveled required by CEQA for the applicant and his "up to 10 employees."
5. Cultivation Slope is higher than 15% - County Ordinance 2599 CCLUO [Inland] states "55.4.6.4.1 Slope Cultivation Site(s) must be confined to areas of the Parcel where the Slope is 15 percent or less."

Staff Report states that it will be "less than 50 percent" and the Commercial Cannabis Application Plan states that the slope is ">15% in most cultivation areas."

6. Property is Was Placed in the Wrong Watershed for the County Permit and Acreage Limitations Calculation

6.1 Staff Report "FINDING Approval of the project is consistent with Humboldt County Board of Supervisors Resolution No. 18-43 which established a limit on the number of permits and acres which may be approved in each of the County's Planning Watersheds." The associated supporting documentation is not presented. In addition, the Staff Report states that "EVIDENCE The project site is located in the Middle Main Eel Planning Watershed, which under Resolution 18-43 is limited to 360 permits and 125 acres. Approval of this application would result in 74 approved permits for a total of 33.4 acres."

6.2 Said property is actually in the Redwood Creek watershed that has a limit of "141 permits and 49 acres."

7. The County did not provide a CEQA Cumulative Impact Analysis related to this application and the surrounding area (other cannabis grows, homes, etc.).

Thank you for your consideration of these concerns.

Regards,
Marisa Darpino
District 5

Titlow Hill
XXXXX

xxxHow much of the taxpayer money is being spent on this project outsourcing its review by LACO?