

From: [Michael Lommori](#)
To: [Saucedo, Portia](#); [Planning Clerk](#)
Cc: [Johnson, Cliff](#); [Noetic Consulting](#)
Subject: RE: Public Comment - NorCal 420 Patient Collective, Inc - PLN-12778-CUP - May 4, 2023
Date: Tuesday, April 25, 2023 1:50:57 PM
Attachments: [image001.png](#)

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

Thank you very much!

Mike

From: Saucedo, Portia <psaucedo1@co.humboldt.ca.us>
Sent: Tuesday, April 25, 2023 1:38 PM
To: Michael Lommori <MLommori@spi-ind.com>; Planning Clerk <planningclerk@co.humboldt.ca.us>
Cc: Johnson, Cliff <CJohnson@co.humboldt.ca.us>; Noetic Consulting <noetic.consulting@gmail.com>
Subject: RE: Public Comment - NorCal 420 Patient Collective, Inc - PLN-12778-CUP - May 4, 2023

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Hi Mike,

Staff is recommending that the applicant develop an additional 40,000 gallons of water storage, bringing the total water storage on-site to 210,000 gallons, which should account for more recent drought years less pond recharge during this period would occur and evaporation loss from the pond could exceed 20% for the same time frame.

The anticipated irrigation water need originally was anticipated to be 300,050 gallons (8.06 gallons per square foot). However, to meet the 10% limitation in ancillary nursery area, the applicant reduced the ancillary nursery size to 3,210 square feet. According to the applicant this reduction substantially decreased the water need. The new anticipated annual irrigation water requirement is 185,000 gallons (5.24 gallons/square foot). While this amount is lower than typical (a typical average is approximately 8-12 gallons a square foot) the recommended conditions of approval include the requirement for a water meter and annual reporting. Should the irrigation amount prove to be more than anticipated the applicant will be required to either reduce the cultivation area or increase water storage.

We'll add the condition to specify that water for commercial purposes from Sierra Pacific Land & Timber be forbidden.

Kind regards,

| **Portia Saucedo, M.Sc.**



Associate Planner
[Planning and Building Department](#)
Main: 707.445.7541
Direct: 707.268.3745
Fax: 707.268.3792

*Effective Jan. 5, 2022 we will staff the Garberville complex office at:

715 Cedar Street
Garberville, CA 95542

The office will be open on the first and third Wednesday of each month from 9:30 A.M. – 3:30 P.M.

From: Michael Lommori <MLommori@spi-ind.com>

Sent: Tuesday, April 25, 2023 12:09 PM

To: Saucedo, Portia <psaucedo1@co.humboldt.ca.us>; Planning Clerk
<planningclerk@co.humboldt.ca.us>

Cc: Johnson, Cliff <CJohnson@co.humboldt.ca.us>; Noetic Consulting
<noetic.consulting@gmail.com>

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Thank you for the response, Portia. The amended project description does make more sense regarding water storage and use. I understand that the pond is located on the subject property APN 210-101-011-000, however the water source I was referring to is located on Sierra Pacific Land & Timber (SPL&T) property APN 210-101-012-000, which is the deeded source for domestic and household purposes for a portion of the subject property (see attached map). As I recall, law enforcement had indicated to me that the SPL&T water source was previously used for unpermitted commercial cannabis cultivation on the subject property.

Again, I would like to ensure that the water source located on SPL&T property is not used for commercial purposes. We have seen time and again where cannabis cultivators (both permitted and unpermitted) run out of water from their identified sources and end up taking it from unpermitted sources on SPL&T property. Anything that can be done in the permitting process that will help prohibit this type of water theft would be much appreciated. It would seem prudent to require identification of secondary water sources given the uncertainty of annual April-September precipitation amounts. At the very least I would ask for a stipulation in the permit that forbids the use of the indicated water source on SPL&T property.

Thanks again,

Mike

From: Saucedo, Portia <psaucedo1@co.humboldt.ca.us>

Sent: Tuesday, April 25, 2023 11:19 AM

To: Michael Lommori <MLommori@spi-ind.com>; Planning Clerk
<planningclerk@co.humboldt.ca.us>

Cc: Johnson, Cliff <CJohnson@co.humboldt.ca.us>; Noetic Consulting
<noetic.consulting@gmail.com>

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Hello Mike,

The project was proposed as the notice states, however, the applicant/agent have amended the project. I explain this in the staff report that has not yet been published for review. The pond is the sole source of water, but it does recharge with rainfall, so catchment is also accurate. The pond is located on APN 210-101-011-000, not 210-101-012-000. No water source from APN 210-101-012-000 is proposed to be utilized for commercial use.

Here is the draft language in the executive summary of the staff report being reviewed by Cliff Johnson (CCd):

“The applicant seeks a Conditional Use Permit for 32,100 square feet existing commercial cannabis cultivation consisting of 22,186 square feet light deprivation, 4,214 outdoor, and 5,700 mixed light. Initially, 5,130 square feet of ancillary nursery area was requested, however, to meet the 10% limitation, the applicant will allocate 3,210 square feet will be allocated for ancillary nursery space. The primary irrigation water source is diversion from an onsite pond that is approximately 10,000 square feet in surface area, which yields a recharge rate of 9.5” of rainfall during the period of April – September: approximately 42,500 gallons. The current water storage capacity onsite is 74,500. Current water tanks include two (2) 1,000-gallon tanks and one (1) 2,500-gallon tank. Initially, the proposed water storage was 100,000-gallons stored within twenty 5,000-gallon hard tanks. Collectively, with the current, proposed, and seasonal recharge from rainfall, the total available storage would be approximately 195,000 gallons. The anticipated irrigation water need originally was anticipated to be 300,050 gallons (8.06 gallons per square foot). However, to meet the 10% limitation in ancillary nursery area, the applicant reduced the ancillary nursery size to 3,210 square feet, as previously mentioned. This reduction decreased the water need. The revised anticipated annual irrigation water requirement is 185,000 gallons (5.24 gallons/square foot). Processing would be performed onsite. Up to eight (8) employees are expected for operations. The power source is a generator, however this project is proposed to be conditioned upon transition to renewable energy.”

Please let me know if you have further questions/concerns.

Kind regards,



Portia Saucedo, M.Sc.

Associate Planner

[Planning and Building Department](#)

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From: Michael Lommori <MLommori@spi-ind.com>

Sent: Tuesday, April 25, 2023 10:56 AM

To: Planning Clerk <planningclerk@co.humboldt.ca.us>

Cc: Saucedo, Portia <psaucedo1@co.humboldt.ca.us>

Subject: Public Comment - NorCal 420 Patient Collective, Inc - PLN-12778-CUP - May 4, 2023

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Project Title: NorCal 420 Patient Collective, Inc

Record/Case Number: PLN-12778-CUP

Date of Hearing: May 4, 2023

The project description says that the primary irrigation water sources are a diversion from an onsite pond and rainwater catchment. The description also states that there is currently 75,675 gallons of storage capacity, with another 100,000 gallons of proposed storage. With a water need of 300,050 gallons, the water storage capacity is 124,375 gallons short of the water need. Since the water sources are characterized as the “primary” sources and the water storage capacity is short of the water need, it leads me to believe there may be secondary water sources that have not been identified.

To my knowledge a portion of the subject parcel does have a deeded right, on property owned by Sierra Pacific Land & Timber (APN 210-101-012), to take “sufficient water for domestic and household purposes.” This water right on Sierra Pacific Land & Timber property does not include use for commercial purposes. Please ensure that the conditional use permit for this project prohibits the use of water from any source located on Sierra Pacific Land & Timber property for commercial purposes.

Thank you for your attention to this matter.

Best,

Mike Lommori

*Coast District Manager
Sierra Pacific Industries
548 N. Fortuna Blvd
Fortuna, CA 95540
707-617-2409 ext 1*