

ATTACHMENT 6

**Agency and Public Comment
for CEQA Circulation Period and
10-Day Noticing Period**

PLN-2021-17384 CUP Cisco Farms.

amanda@confluencenutrition.com <amanda@confluencenutrition.com>

Fri 8/26/2022 10:02 AM

To: Holtermann, Michael <mholtermann@co.humboldt.ca.us>; Johnston, Desmond
<djohnston@co.humboldt.ca.us>

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

Dear Mr Johnston and Mr Holterman,

I am writing in objection to permit PLN-2021-17384 CUP Cisco Farms.

As an adjacent neighbor to the property, I object to approval of this permit by the planning commission and the BOS. The proposed project in it's current proposed scale is likely to significantly affect the quality of life of my family and other adjacent neighbors with noise, odors, light pollution, traffic, and impact to water resources.

And though they're not often considered very highly in these types of deliberations, there would also be impacts to wildlife.

Specifically, I'm concerned that though a PG&E power drop is planned, it is my understanding that PG&E is not able to supply more power needed in our valley already due to large grow operations. In the absence of grid power, this property is likely to use loud diesel generators in the interim, which would devalue our property and impact our quality of life.

I'm also especially concerned that the lighted greenhouses will not be properly covered. Though the law requires growers to cover their greenhouses, in practice this doesn't happen, enforcement is impossible in our rural and distant area, and there is no recourse for neighbors who are impacted by this light pollution.

Finally, water resources are very marginal at our own homestead, which is downstream of this grow operation. I full expect that groundwater withdrawals would impact our already marginal supply.

While I support the appropriate use of working lands, I do believe that the use as proposed is inappropriate and puts an unrealistic burden on our social and ecological systems. I encourage the county to drastically reduce the scope of the

project, or deny it outright.

Thank you,

Amanda Malachesky (She / Her)
Functional Nutrition Health Coach
FNLP, FDN-P, CIHC, CMT

(707)-599-3825

www.confluencenutrition.com

[Subscribe to my Confluence Nutrition YouTube channel](#)

Learn more about [The Calm Digestion Method](#) program

Follow me on Instagram: @confluencenutrition26

"The best medicine is to teach people how not to need it." ~ Hippocrates

Petrolia Resident

From: [Becky Grant](#)
To: [Johnston, Desmond](#)
Subject: Cisco Farms, Inc. Cannabis Project
Date: Wednesday, August 17, 2022 4:06:26 AM

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

Re: Project title:

Cisco Farms, Inc. Cannabis Project

Record Number: PLN-2021-17384

Dear Mr. Johnston,

The notice of intent for the aforementioned project sparks several concerns.

While I am not in direct line-of-sight from my front door, I am just below in terms of the creek which passes through this property. The first concern is related to the implications on the health of the creek and the watershed. The proposed large-scale production which requires the amount of water necessary for sustenance will deplete the aquifers and lower the base groundwater level of the nearby creek, thereby decreasing the flow of the year-round creek, the east branch of East Mill Creek, which is a known to be the home of species, such as salmon. The creek is also essential to sustain the riparian zone which acts as an important barrier to the massive Eucalyptus grove adjacent to the riparian zone and tragically dangerous source of fuel for wildfire which would surely incinerate the entire community of Petrolia. The massive eucalyptus here are unremovable, despite the attempts by local fire safety projects, and the tree work provided by PG&E subcontractors. If this delicate riparian zone is depleted of its water, it can no longer act as a protective fire barrier for this source of fuel which endangers our community every fire season. It is well known that this area on Chambers road is a ferocious wind tunnel throughout the year and a constant danger to the surroundings in fire season. While the proposed project states that it will utilize rainwater alone, if this is even feasible, that's a lot of rain being filtered through non-native amendments and much can be lost through natural processes. As it stands, some long-time permanent residents struggle to maintain water just for drinking and flushing toilets. How can there be enough water for the proposed project if there is not enough water for the basic needs of households?

Secondly, the impacts on the road are substantial. The beginning of Chambers Road is where our preschool, elementary school and high school are located. The school has never been given proper funding and the county or the state have not provided the infrastructure to make the current situation safe, let alone able to handle greater impacts. Furthermore, the county has never repaired the bridge located approximate .5 miles from the beginning of Chambers Road. As it stands now, it is a one-way "temporary" bridge with minimal side rails. The addition of up to 34 new residents on Chambers Road after the bridge is a significant risk factor in fire season. Residents would be at risk in the event of a fire. Children and adults going to and from the school will be encountering more traffic in an already dangerous situation. The bridge must be repaired before a project of this scope is approved.

Furthermore, related to the fire hazards, the proposed project is outside the Petrolia fire district. However, if a fire were to start on this road, it would be up to the tiny Petrolia Volunteer Fire Department to address the situation. There are limited resources for the

volunteer agency as it stands. The PVFD is already over extended already. The county would be obligated the fire district to mitigate the strain it would be adding to the PVFD and the PVFD would need to find more funding.

I am not opposed to the project altogether and approve of agricultural endeavors that can be supported by the property and the location, but the scope is far too large for the location with limited water, limited access, and limited emergency services. Thank you for taking these concerns into account when considering the scope of this project.

A concerned neighbor,

Becky Grant

707-845-5161

741 Chambers Road

Petrolia, CA 95558

~ “petit a petit, l’oiseau fait son nid”

PLN-2021-17384 CUP Cisco Farms.

Drew Barber <info@humboldtfarmsteadcannabis.com>

Fri 8/26/2022 7:38 AM

To: Holtermann, Michael <mholtermann@co.humboldt.ca.us>; Johnston, Desmond
<djohnston@co.humboldt.ca.us>

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

Drew Barber
PO Box 112
Petrolia, CA

Desmond Johnston
Michael Holderman
Humboldt County Planning Dept.
by email

Dear Mr Johnston and Mr Holterman,

I am writing in objection to permit PLN-2021-17384 CUP Cisco Farms.

As a licensed cannabis cultivator, neighbor, and fire fighter, I object to approval of this permit by the planning commission and the BOS. The proposed cannabis operations are more suited to industrial zoned areas, not ag exclusive. In addition to the issues of safety, projects of this scale place unrealistic pressure on our community expectations and vital social and ecological resources. There is not a resident in rural Humboldt county that would like to live next door to a 5 acre green house grow. This scale of operation is not included in our expectations of zoning classification "agricultural exclusive" or other ag classification land use.

This operation in particular if approved would:

*Increase traffic on a poorly maintained, on-way county road with a one-lane "temporary" bridge

*Endanger school students/ parents/staff through its Increase traffic and hazards in a residential area next to a school

*Increase risk of fire and hamper emergency response – the project proposes to employ more individuals at any given time of year at a density greater than downtown Petrolia in a SRA zone that is also in Petrolia Fires emergency response area, but not in our district.

*Reduce the quality of life for all residences along chambers rd.

*Reduce the limited and precious water available along East Mill Creek to the existing residences and wildlife

As a fire fighter and captain of the fire department, I see significant issues with the volume of individuals needing ingress and egress to and from the project site, the lack of sufficient emergency access, the condition and width of the county road, and the traffic flow going past the school.

This operation as proposed, poses significant risk to health and safety of our community

Before any part of this project gets approved, the county needs to:

1. Reduce the project size to 1 acre outdoor
2. Fix Chambers Road (one-lane temporary bridge, blind turns etc)
3. Fix the Chambers Rd where Mattole school interfaces to bring it into compliance with state school safety standards.
4. Expand the Petrolia Fire district to include the entirety of this parcel in the district

While I support the appropriate use of working lands, I do believe that the use as proposed is inappropriate and puts an unrealistic burden on all our vital emergency response, social and ecological systems.

Thank you,

Drew Barber

Cisco Farms, Inc. Cannabis Project Record #PLN-2021-17384

Dan B <calcoastal2@gmail.com>

Thu 8/25/2022 4:02 PM

To: Johnston, Desmond <djohnston@co.humboldt.ca.us>; Holtermann, Michael <mholtermann@co.humboldt.ca.us>

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

Dear Mr. Johnston and Mr. Holtermann,

I hope you are well enough.

I imagine the job you do is not an easy one.

I'm seventy years old. For ten years I have been a property owner in Petrolia and I live full time at 330 Chambers Road. I purchased my place after working for more than thirty years in industrial areas, and paying my taxes, so that I could retire here and enjoy the remarkable climate, beauty, and peace of Petrolia.

Because of the conditional use permits issued in the past few years, instead of the profound lovely quiet, and sounds of nature I came for, the soundtrack of my life now resembles a property with an airport for a neighbor where the planes don't fly, they just sit on the runway day and night making a droning noise that inundates my property from the valley floor almost half a mile away. And the plastic ugliness and rickety fences that have replaced beautiful views along Mattole Rd. are disheartening.

I know this is not the first time your attention has been directed to this issue. Over and over again the BOS and planning department have been faced with average people, caught in the middle of all this, often with their life savings invested in a quiet home they love, now begging for relief from the impacts of well financed industrial cannabis grows.

Far too many growers use a business model designed for their own profit at their neighbors' expense. No one who isn't also a grower sets out to buy property next to a large grow. So the impact to non grower neighbors' property values and the sudden decrease in enjoyment derived from owning these properties is shocking.

I know you do not intend to inflict suffering or provoke negative health outcomes. But innocents are being harmed. Please don't turn a blind eye to the impacts these projects have, and don't put too much stock in the optimistic assessments, submitted by the absentee owners of these projects, which are designed to deter scrutiny and provide superficial deniability. Anyone living anywhere near one of them can tell you the real story.

In their effort to make the most of their limited allowed space, the energy intensive greenhouse model can be a cruel neighbor and doesn't even vaguely resemble any of the older, more normal forms of agriculture practiced in the Mattole Valley.

The wonderful preexisting sights, sounds, and smells of this remarkably beautiful place should not be theirs to take.

They don't belong to just them.

The Mattole is worth more than their money.

So I ask that you not approve this exceptionally large, out of character with our neighborhood, ugly, noisy, industrial creeping cancer.

Sincerely,

Daniel Berger

330 Chambers Rd, Petrolia

Cisco Farm

Dave Grant <mattolecraftsman@gmail.com>

Thu 8/25/2022 10:43 PM

To: Holtermann, Michael <mholtermann@co.humboldt.ca.us>; Johnston, Desmond <djohnston@co.humboldt.ca.us>

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

David Grant
P.O. Box 166
Petrolia, CA

Cisco Farm
PLN-2021-17384 CUP

Desmond Johnston
Michael Holderman
Humboldt County Planning Dept.
by email

Dear Mr Johnston and Mr Holderman,

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 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

From: [Jessica Brown](#)
To: [Planning Clerk](#); [Johnston, Desmond](#); [Holtermann, Michael](#); [Bohn, Rex](#)
Subject: Cisco Farms PLN-2021-17384 Negative Declaration
Date: Friday, August 26, 2022 10:00:19 AM

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

To Humboldt County Planning and Building Department,

I am a resident, homeowner, small business owner, soon to be 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 dog, off leash. 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 already degrading at the speed of light, and not getting fixed by you, the county, as much as it should be. Have you seen our bridge? It's narrow, old, doesn't seem ideal for bringing the millions of dollars of infrastructure it would take to build said operation. Have you been to Petrolia? There is no housing, we are in a housing crisis.

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 mega 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.

Jessica Brown

From: [John Williams](#)
To: [CEQAResponses](#); [Planning Clerk](#)
Cc: [Bohn, Rex](#); [Madrone, Steve](#)
Subject: comment re proposed mitigated neg dec
Date: Tuesday, August 23, 2022 1:15:13 PM
Attachments: [Cisco Farms letter.docx](#)

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

Friends,

Please find a letter regarding the proposed Cisco Farms cannabis operation (PLN-2021-17384); please let me know that you received it.

Best,

John

--

John G Williams
29665 Mattole Rd
(mail to PO Box 214)
Petrovia, CA 95558-0214
707 629 3265
jgwill@frontiernet.net

August 23, 2022

Humboldt County Planning and Building Dept.

By email

Cc: Rex Bohn, Steve Madrone

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 bought¹ 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 contract² 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

¹ I should note that two growers contributed toward this purchase.

² 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.

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, 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 ...**³” (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

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

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 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.⁷”. Footnote 7 is: 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

John G. Williams, Ph.D.
PO Box 214, Petrolia, CA 95558

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 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,⁴ 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 area⁵ 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

References:

Duncan, J. 8/6/22. The Cannabis Conversation: Humboldt’s Big Play
<https://lostcoastoutpost.com/2022/aug/6/cannabis-conversation-humboldts-big-play/>.

Rahmat, S.N., Al-Gheethi, A.A.S., Ayob, S. *et al.* Development of dual water supply using rooftop rainwater harvesting and groundwater systems. *SN Appl. Sci.* **2**, 85 (2020).
<https://doi.org/10.1007/s42452-019-1862-9>

Reid, L. M. and J. L. Lewis. 2011. Evaluating cumulative effects of logging and potential climate change on dry-season flow in a coast redwood forest.
https://www.fs.usda.gov/psw/publications/reid/psw_2011_reid001.pdf.

⁴ 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.

⁵ This might be defined as within three miles of ‘downtown’ Petrolia.

21 August, 2022
Humboldt County Building and Planning Department
3015 H Street
Eureka, CA 95501



Members of the Humboldt County Planning Department,

I am writing regarding the proposed Cisco Farms cannabis cultivation permit (PLN-2021-17384).

In reading the Mitigated Negative Declaration, I am concerned that the magnitude of the proposed farm will greatly effect the infrastructure of Petrolia. Petrolia currently struggles with rural isolation, difficult roads, limited housing, limited necessary services and an already overwhelming influx of temporary workers requiring health and well-being services that are already stretched to capacity. A farm and processing facility of this size will necessitate increased personnel; workers [full time and temporary] and increased delivery drivers [construction materials, concrete, soil, modular homes, etc.]. With no cell phone connection, no public internet connection, no restaurants, no laundry, no public bathing and only two public port-a-pots, the needs of these additional personnel in our village can not be currently met.

In addition, I have great concern that Chambers Rd. can not accommodate the increased traffic needed for a project of this size. Chambers Rd. is a 1 mile category #4 dead end roadway. At the juncture of Chambers Rd. and Mattole Rd., the Mattole Unified School educates the children of Petrolia and Honeydew from prekindergarten to high school. Students often walk and ride their bikes to school and drop off for students is at the school entrance on Chambers Rd. There are 18 homes on Chambers Rd., the nursery for the Mattole Restoration Council, three cannabis farms and one vegetable farm. In places, Chambers Rd. is too narrow for 2 cars to pass comfortably, portions of the road are gravel or heavily damaged with pot holes, the "temporary bridge" across Mill Creek [a perennial class I watercourse] is a very narrow single lane and the road has been maintained by neighbors; because it has not been adequately maintained by Humboldt County in years. For the residents of Chambers Rd., the only emergency evacuation route is Chambers Rd. and past an eucalyptus grove; which poses a significant fire risk. There is only one road in and only one road out.

The proposal indicates that this large industrial construction project will require increased traffic around the village square, past the school and down the already disintegrating Chambers Rd. At peak season, the project would employ approximately as many workers as there are houses along the road and unless the road is greatly upgraded the increased traffic will be dangerous for all.

I ask that you consider the affect this industrial scale farm will have on the safety of our neighbors, our road, our homes and our quiet rural life.

Respectfully,

A handwritten signature in black ink that reads "Kay S. Raplenovich". The signature is written in a cursive style.

Kay Raplenovich
PO # 171
1134 Chambers Rd.
Petrolia, CA 95558

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

senora@frontiernet.net

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

From: [Marcia](#)
To: [CEQAResponses](#); [Planning Clerk](#)
Subject: Comment Re PLN-2021-17384
Date: Tuesday, August 23, 2022 12:57:18 PM
Attachments: [M. Ehrlich letter PLN-2021-17384.pdf](#)

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

Attached please find my letter regarding Cisco Farms, Inc Cannabis Project: Record Number: PLN-2021-17384.

Marcia Ehrlich
Chambers Road resident
Petrolia, CA 95558-0084

Marcia Ehrlich
PO Box 84
Petrolia, CA 95558
August 23, 2022

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

Project Title: Cisco Farms, Inc Cannabis Project: Record Number: PLN-2021-17384

I am concerned about the following topics:

>**Neighborhood Lives Impact:** Rural living in harmony with nature is destroyed by industrial scale cultivation of cannabis adjacent to established neighborhoods. Noise from fans and intrusive lights at night negatively impact residents. There is no tangible enforcement of shut-off rules in Petrolia. Repeat offenders face no consequences, nothing changes after inspections. The adverse environmental effect causes mental anguish and is disastrous for long term residents.

>**Setbacks:** The scale of a five-acre project only 30 feet from the property line needs attention. The Humboldt County Supervisors could help address the conflict of maintaining 100 feet defensible space for fire safety versus the minimal SRA designated setback from property lines. Should neighbors choose to plant tall vegetation barriers to cut down sound, light and visual pollution, this will create excessive fire danger. A suggestion by the Supervisors to require a 100-foot setback would help with this problem.

>**Life Safety Fire Entrapment:** The Permit Report addressed mitigation of fire danger on the project site. This project more than doubles the number of possible residents on the East side of the Chambers Road one-lane bridge located on a blind curve at the bottom of a steep hill. This is the only existing exit for residents on a dead-end road, in case of evacuation for fire approaching Petrolia from outside the area. Heavy disorienting smoke will cause a backup at the bridge with so many additional residents during "peak employment" which coincides with peak fire season. An accident on the narrow bridge with only its road-level, 9 inch-high curb guard would block the bridge and create a disaster. Permission for residents to use alternate, Emergency Only, exit routes across private property with existing dirt roads needs to be organized and formalized before the county grants approval to increase the population on the Eastern side of the one-lane bridge. Firefighting equipment going the opposite direction needs alternative permitted access as well.

>**High Hazard Fire Area:** Cisco Farms, Inc. is on exceptionally windy terrain. The report cites two large scale fires started on this land in the 1970's, burning over 500 acres. Not mentioned was the fire on August 18, 2021 which a neighbor reported immediately, was fought and brought under control by the Petrolia Volunteer Fire Department in 90 minutes and 3 volunteer

firefighters stayed to monitor it overnight. On April 9, 2022 a gust of wind overturned my 3 year-old woodshed, complete with cement footings high in the air. Astonishing as this was, it happened a second time 1 month later. That was this year. Six years ago, an entire plastic covered large greenhouse nearby collapsed during a windy event. Wind plus fire make Chambers Road a highly hazardous area. Fire prevention here requires savvy, vigilant humans. The environmental impact of a new 34 residential work force poses a scary, high risk. Special education of the workers is needed.

>**Chambers Road Safety:** This road is designated Class IV but has not been maintained as such. There are no painted center lines and in places it is narrower than 24 feet. The lack of shoulders leaves no safe place to walk beside the road. The road surface has been occasionally patched beyond the school. School children walk and bike to and from school on the uneven potholed surface. The Physical Education Program at the school often uses the one-mile full length of the road for its students to run. Adding significant traffic during build out of the proposed project comes with high risks.

>**School Signage:** Urgent installation of a “School” sign designed to remain upright is needed before build out of a large project. The Western direction on Chambers Road has an uphill, deep runoff ditch which poses a challenging location to site the vital “School” sign. It falls over quickly and is in the weeds and hidden most of the year. In this rural community, the school playground is the only location for team sports and other organized activities. It is used year-round.

>**In conclusion:** Long-term residents endure the hour-long drive on the Mattole Road to Ferndale and points beyond for goods and services in order to enjoy the abundance of wildlife, variety of birds that can be heard and seen, the lack of vibration of freeways and vehicular traffic, terrific views of stars and the sense of community that neighbors give to one another in a fairly remote location. While it is understandable that Humboldt County needs to monetize large tracts of land, a variety of crops that are more lucrative and less intrusive to grow could be introduced to ranchers and growers by the county agricultural department. Skills developed for growing cannabis can be transferred to other crops that leave the overall environment intact and at the same time allow businesses leeway to respond to changing market conditions. Crop rotation has long been a tenet of good agricultural practices. Current decommissioning regulations for cannabis growing in the county prevent this for one year. Rethinking the efficacy and economics of large industrial cannabis farms could save the wonder and beauty of rural Humboldt County while promoting agriculture here.

Sincerely,

Marcia Ehrlich



Can you see the sign?



Sign in the weeds



Sign post in ditch



Better placement for sign on the other side of the road



Blind approach from steep hill on exit route



Low curb on one-lane bridge



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

Planning Department,

This correspondence will detail my opposition to the current proposal for the large cannabis production facility as presented by Cisco Farms (PLN-2021-17384). My concerns can be summarized into three major points: the large size proposed for the grow accessed by a substandard road and bridge, the capture and retention of a large volume of rainwater and the fire risk to the facilities associated with an already isolated and restricted area.

Chambers Road has been neglected for at least the last six years that I have lived at the end of the road. It is filled with large pot holes, possesses two blind curves as approaches to a "temporary" single lane bridge (without guardrails) and lacks the necessary lane markings and width to truly qualify as a safe passageway. This is particularly true as the road passes the Mattole School where parent traffic and the narrowness makes it risky to pass through. A cannabis facility as proposed by Cisco Farms, with the added traffic of cars and large trucks, would only make the situation worse and add an additional factor of danger for all who travel on the road.

Although the proposal goes to great length in detailing that it could collect all the rainwater it needs, even in times of drought, it ignores the fact that this rainwater will not be available for the local streams and eventually the Mattole River. The Mattole watershed is already in a state of decline as a consequence of the prolong drought and losing this amount of water to a large industrial grow will make the situation even more dire. Additionally, all the efforts put forth by the Mattole Restoration Council and the Mattole Salmon Group to rehabilitate the watershed for fish habitat will once more be severely diminished by this capture of rainwater.

The proposed location for the facility lies at the end of Chambers Road where access for fire fighting equipment is extremely limited. Not only is the road quality substandard, it also passes through a heritage eucalyptus tree grove that harbors decades of detritus that if ignited, would cut off any egress from the facility. Even alternative escape routes, on private roads, are endangered by fir forests and locked livestock gates. Getting fire fighting equipment in and positioned expeditiously to service such a large production facility, including housed workers, is problematic at best.

Perhaps a more modest proposal that would not place such a large strain on an existing substandard infrastructure would be a more reasonable proposal. Hopefully, what I have described above will help in your deliberations concerning this proposed cannabis grow.

Respectfully submitted,

A handwritten signature in black ink that reads "Robert Raplenovich".

Robert Raplenovich
P.O. Box 171
Petrolia, California 95558
August 21, 2022

From: [River Walker](#)
To: [Planning Clerk](#); [Johnston, Desmond](#); [Holtermann, Michael](#)
Subject: Cisco Farms PLN-2021-17384 Negative Declaration
Date: Thursday, August 25, 2022 11:36:21 PM

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

To Humboldt County Planning And Building,

I write to plead against Cisco Farms' proposal for an industrial cannabis operation on Chambers Rd in Petrolia.

This is an outrageous proposal. Obviously. And it's meant to push the bounds so some (or all) will be approved. This is so hard because so, so many are opposed here and it feels like nothing can be done and we don't have the representation to fight it. This size and type of cannabis operation affects ALL locals negatively and is part of a folly that if unchecked will most likely beggar the entire community while "profiting" only a few. The fallout from continuing to approve operations of this scale is the exodus of locals and the detriment of would be locals, decrease in property value assessments and waning interest in habitation, decrease in school attendance as families move away from misplaced and ugly industry, and the detriment of nature in all directions. This is not the world that anyone who calls the lower Mattole home wants, it is only the want of those who missed the green rush or don't know when to leave well enough alone. These few have a disproportionate effect on all of our lives, and it's especially alarming as I sit here beside my pregnant partner awaiting the arrival of our first born, and consider the future we had imagined, versus the future these proposals aspire to.

Industrial grows do not belong here. This is not a throwaway land for exploitation and day labor in greenhouse monocrops. We are a community of friends and families who live here for the natural beauty and wonderful people. Travelers discover this place and fall in love; it's world famous as the Lost Coast of California. Until recently the lower Mattole has been one of the last rural Humboldt areas without greenhouses everywhere, mainly because we the community do not live here to extract, we live here for the love of place and people. We welcome tourism and remote working, we welcome people who would live for the joy of it here.

Yes without the prior ease of black market money lives have changed all over Humboldt county. Greed will not assuage the loss of easy living, and the cannabis industry and those in it must learn to move on without ruining the good that it helped to create. Weed was a way to create community and life, never was the dream to incur day labor wages for interminable greenhouse hours. If that's the dream, this is not the place for it. Each permit of this size that is approved is a nail for the coffin being hewn. Each approval pushes us out with fences and lights and fans and trash and roaring engines and labor for no good.

Each new greenhouse turns another traveler off to the idea of pristine Northern

California living. Every opportunity for positive community growth seems outweighed by one or the other individuals need to make their irrational escalation of commitment impactful. It's a death rattle that will take us down with it. This is not the way to a better Humboldt County or a more bountiful one.

People loving place will always be more healthy and profitable than people exploiting place.

This is not the way to capture positive growth revenue for the long term, it is not the strength of our region, it is not the future that will sustain us.

There is no benefit to our community; it can only be viewed as detrimental.

Please don't let this continue. We all know that cannabis as it stands is the current mistake of overly invested entrepreneurs stuck in an echo chamber, and a system forcing their hands to double down. It's not worth the ruination of this place. Please don't let the environment of this community and neighborhood stand in the balance so the owner of this land can act on or use this permit as a bargaining chip. It is not profitable or reasonable to move ahead and yet with each new sunk cost the travesty forges on.

This specific grow would triple the traffic down a single lane crumbling neighborhood road with blind corners and a one lane bridge; a road that passes the school our child will one day ride their bike to. It's a road that every day hosts children already free to roam and folks walking with unleashed dogs, because traffic is low and cars stopping to talk is normal. This is not an industrial road that cars pour in and out of, and this is not a land of greenhouses and extraction facilities.

This is one of the most gorgeous and unique areas the North Coast has to offer, and this is home. Please do the right thing for both the locals and the future of Humboldt County, and reject the destruction of our beautiful home.

Respectfully,

River Walker

Born and raised here.

Moved back 5 vegetable farm seasons ago to start a family and be part of the most beautiful community I've known.

Surrounded on all sides by proposed grows, and wondering if the family of owls above us will still fly and the water below us will still flow.

From: [Thomas Rosin](#)
To: [Johnston, Desmond](#)
Subject: PLN 2021-17384 Cisco Farmers: Call for Positive Impact
Date: Monday, August 15, 2022 8:40:04 AM

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

To: Desmond Johnston, 707 441 3622, <djohnston@co.humboldt.ca.us>
Humboldt County Planning and Building Department 3015 H street, Eureka CA 95501

RE Call for a Positive Declaration of an Environmental Impact of the Cisco Farmers, Inc., Cannabis Project, PLN 2021-17384.to declare significant environmental impact upon landscape, biome, and community in the Mattole watershed.

I urge denial of Petition 2021-17384 to expand vertically integrated, industrial and commercial farming of cannabis into the Mattole River watershed. This coastal region of Petrolia 4 miles from the Pacific Ocean bordering the King Range Reserve has a half century legacy restoring the biome for three species of Salmon by repairing riparian environments, enhancing groundwater reserves and surface flows, while expanding permaculture, alongside beef and cannabis gardening for both subsistence and market. As a prime location attracting fisherman, cannabis tourism, and trekking the Lost Coast, this community has celebrated, through weekly markets and annual events, the principles of local production, self sufficiency, biome restoration and resilience—all of which would be impacted by this new level of industrial agriculture cum commerce brought deep into the Mattole heartland.

This is no micro-business project of 10,000 square feet.

Cisco Farms will devote 100,000 square feet to nurseries, a processing plant extending 100 X 30 feet for drying and storage. Living facilities will be constructed for a year round staff of farm workers, ranging from 12 to 34. We would anticipated hard surfaces to handle transport and construction equipment, and commercial spaces welcoming in-coming buyers and sellers for each level of production. 40 tanks are planned for rainwater storage . These five acres of industrial scale production are to provide for marginal gains through commercial transactions at each level of production (e.g. selling nursery starts, processing other fields and harvests, selling storage space, marketing for self and others, etc.).

Humboldt Country has long attracted national and international attention. The county has been known throughout USA, Europe, and Mexico for its cottage industry of cannabis farming families. This petition expands a vertically integrated industrial production of cannabis, combined with commerce, far into the Mattole watershed,

Must Humboldt County stand by and accept the transformation of cottage agriculture by vertically integrated factory farming: Generators running day and night to fan, light, and over stimulate crops? The intensifying use of water, would divert rainfall from the free flowing Mattole River. This Mattole watershed is central to a half century of efforts to restore three wild species of Salmon, the Coho, Chinook, and Steelhead, to our oceans and countryside. We plead the special nature of the Mattole watershed, in which a citizenry has long supported Sanctuary Forests in the headwaters, and the Mattole Salmon Group and the Mattole Restoration Council on the midriver and delta. These NGOs have been engaged in myriad, half century long efforts to restore and enhance the local biome, to improve riparian habitats, scour middle stream beds, enhance ground water reserves, reduce forest fuel to prevent fire,

remove lumbering roads causing erosion, and improve culverts to afford fish passage to spawning gravels upstream.

These restorative NGOs are an expression of the integrated community life established here, particularly centered in Petrolia, with its school, its social and medical services, voluntary fire department, Community Center and Grange, whose days are enlivened by Sunday breakfast and weekly markets, a quarterly Cabaret night of dining, dancing and performance, summer camp, yoga classes, shared rituals of solstice and equinox, and yearly celebrations of dining on local produce and beef, paid for by minted silver Petrols coins. Such community life remains a natural outgrowth of a cottage economy of subsistence, salmon and biome restoration, enhanced by cannabis and beef for local consumption and export.

Over the last decades we have witnessed numerous experiments in permaculture and integrative gardening, demonstrating resilience by enhancing soils and biome, testing varieties and species in symbiotic combination. Experiments in the vermiculture of worm and fungi have enhanced soils, while a silviculture of tree planting encourages micro-climates as means to achieve resilience in the face of global climate change.

These various properties are, in effect, a study zone for learning strategies and techniques, a guide and inspiration for reforming past agrarian practices in timely response to changing climate.

This joining of three NGOs, local gardeners, and artisan craft and vintage specialists have created a community devoted to biome and landscape enhancement, testing ever expanding experiments in resilience. They have brought wealth, knowledge, and international recognition to our community. Please protect our legacy for future generations, for that legacy serves to educate and inspire.

Why, one must ask, should such iconic, successful experiments in biome restorative and gardening now be swamped by the sight, smells, sounds, congestion and over-consumption of energy and water for an industrial scale enterprise with its sprawling nurseries, plastic covered greenhouses, farm labor housing, processing plants, water storage tanks, and heavy equipment for processing, construction and transport, along with space devoted to parking, commerce and storage—all to be located at the end of a narrow dead-end country road?

I must ask again: Why should we surround such a remarkable flourishing local successes in restorative farming and biome recovery with the sight, sounds, and traffic of a system of industrialized farming that challenges the legacy, values, and daily experience of the communities that inhabit the Mattole watershed. Here 4 miles from the Pacific Ocean, as a favored entrance to the King Mountain Conservation Reserve, we have a valley congenial to artisan craft, cannabis tourism, fishing, and trekking the Lost Coast. Such a proposed enterprise, now occurring in a time of excessive costs, falling prices, intense competitions of scale, and limited markets, might just leave us with the abandoned wreckage of their own debris.

Yours sincerely,
R. Thomas Rosins
940 Lighthouse Road
Petrolia, CA 95558
<thomasgailrosin@gmail.com>

Dear Mr. Johnson / Planning Dept. ~



Please do not approve project PLN-2021-17384
Chambres Rd. can not take + does not want another
cannabis operation. Have you ever driven the road?
The upper end is especially bad, the macadam so de-
graded it has become a narrow gravel road. Do you
really believe Cisco's tanks will be filled by rain
water? It doesn't rain much here anymore. The 100"
of rain years are over. The last several years have
been so dry my well is nearly depleted come Aug/Sept.
What will it be like when Cisco et al suck out all
the ground water? I am due west + a stone's throw
across the dirt road from this proposed project.
He already has a cannabis operation on Conklin
Creek Rd. + its impact on me has been devastating.
(Beneman / Kilgore scene just south of me) For over
40 years I have slept outside all summer, something
I greatly look forward to every year. Since the
Conklin Creek operation has gone into effect I can
no longer enjoy peaceful evenings + sleeping outside
because I can't stand listening to the continual
whooshing of the miserable fans. Honestly it's like
living next to a freeway where the cars never stop.
It's never quiet anymore. No one should have to put
up with this, + now the same, even larger scene will
be right next door to me - more people traveling the
road, trailers, more water use, more fans, more
noise. This is a neighborhood of young, old, children,
high school, grammar schools we do not wish to be
turned into an industrial zone. This is NOT WHY WE LIVE
HERE. Please do not do this to us. It will ruin our
entire way of living here. The whole thing just makes
me cry. Thank you Trish Stefanik →

I am not on the computer, I am a property
owner & tax payer (parcel 10510404)
1020 Chambers Rd
707 629 3529



PLEASE LISTEN



Trish Stefanik
PO Box 42
Petrolia, CA 95558-0042

EUREKA CA
6 AUG 2022 PM 1 L



Humboldt Co. Planning + Bldg.
Dept.
3015 H Street
Eureka, Ca. 95501
*Desmond Johnston

95501-448499



August 24, 2022

Michael Holtermann, Planner
Humboldt County Planning & Building Department
3015 H Street
Eureka, CA 95501
Email: mholtermann@co.humboldt.ca.us

Re: Initial Study/Mitigated Negative Declaration (IS/MND) for Cisco Farms, Inc. Cannabis Project (SCH 2022070433)

Dear Mr. Holtermann:

Thank you for providing the California Department of Cannabis Control (DCC) the opportunity to comment on the Initial Study/Mitigated Negative Declaration (IS/MND) prepared by Humboldt County for the Cisco Farms, Inc. Cannabis Project (Proposed Project).

DCC has jurisdiction over the issuance of licenses to commercial cannabis cultivation and distribution businesses in California. DCC may issue cultivation and distribution licenses to cannabis businesses that meets all licensing requirements, and where the local jurisdiction authorizes these activities. (Bus. & Prof. Code, § 26012(a).) All commercial cannabis businesses within California require a license from DCC. For more information pertaining to commercial cannabis business license requirements, including DCC regulations, please visit: <https://cannabis.ca.gov/resources/rulemaking/>.

DCC expects to be a Responsible Agency for this project under the California Environmental Quality Act (CEQA) because the project will need to obtain one or more annual cultivation and distribution licenses from DCC. In order to ensure that the IS/MND is sufficient for DCC's needs at that time, DCC requests that a copy of the IS/MND, revised to respond to the comments provided in this letter, and a signed Notice of Determination (NOD) be provided to the applicant, so the applicant can include them with the application package it submits to DCC. This should apply not only to this Proposed Project, but to all future CEQA documents related to commercial cannabis business applications in Humboldt County.

DCC offers the following comments concerning the IS/MND.

General Comments (GCs)

GC 1: Proposed Project Description

The IS/MND provides a detailed project description. However, the following information would make the IS/MND more informative:

- 1) Description of cultivation operations and maintenance, including a description any heavy equipment that will be used for cultivation operations, including tractors, forklifts, mowers, etc.; and
- 2) Description of distribution operations that would occur.

GC 2: Phasing

The Project Description indicates that the Proposed Project would be constructed in five distinct phases over the course of five years. To the extent that these details are reasonably foreseeable, the IS/MND would be strengthened if it clarified how and/or whether corresponding operations would vary across phases of the project (e.g., variations in the number of employees hired, vehicle trips, equipment usage, and/or requirements for physical resources [e.g., water, energy]). DCC assumes that the IS/MND evaluates Proposed Project operations and maintenance activities as they are anticipated at full buildout (e.g., when all project phases have been completed). The IS/MND would be improved if the County clearly confirmed (or clarified) this assumption.

GC 3: Acknowledgement of DCC Regulations

The IS/MND acknowledges that the Proposed Project would require one or more commercial cannabis business licenses from DCC. The document would be improved if it explained specifically that a cannabis distribution and one or more cannabis cultivation licenses will be needed. Furthermore, the IS/MND's analysis could benefit from discussion of the protections for environmental resources provided by DCC's regulations. The impact analysis for each resource topic could be further supported by a discussion of the effects of state regulations on reducing the severity of impacts for each applicable topic. DCC's regulations can be found at: <https://cannabis.ca.gov/resources/rulemaking/>.

GC 4: Evaluation of Cumulative Impacts

It is important for CEQA analyses to consider the cumulative impacts of commercial cannabis businesses in Humboldt County. Of particular importance are topics for which the impacts of individual projects may be less than significant, but where individual projects may make a considerable contribution to a significant cumulative impact. These topics may include, but are not limited to:

- cumulative impacts related to transportation; and
- cumulative impacts related to air quality and objectionable odors.

For impacts that would result in potentially significant impacts, the document should specify mitigation measures to reduce or avoid such impacts. If mitigation measures would not reduce the project’s contribution to cumulative impacts to less-than-significant levels, an IS/MND would not be the appropriate CEQA document for the Proposed Project.

Specific Comments and Recommendations

In addition to the general comments provide above, DCC provides the following specific comments regarding the analysis in the IS/MND.

THIS SPACE INTENDED TO BE LEFT BLANK

Comment No.	Section Nos.	Page No(s)	Resource Topic(s)	IS/MND Text	DCC Comments and Recommendations
1	1 (9)	7	Cultivation Methods	Full mixed-light cultivation would not occur until upgraded power from PG&E is in place.	The IS/MND would be improved if it explained an expected timeframe for the upgraded power from PG&E to be completed.
2	3.2.1 (c)	17	Aesthetics	The Proposed Project site is surrounded by agriculture, grasslands, woodlands, cannabis commercial operations, and agricultural operations.	The IS/MND would be improved if it disclosed the distance and location of the nearest sensitive receptor.
3	3.2.1(d)	18	Aesthetics	N/A (General Comment)	The IS/MND would be strengthened if it referenced DCC's requirements that lights used in mixed-light cultivation activities must be fully shielded from sunset to sunrise to avoid nighttime glare (Cal. Code Regs., tit. 4 § 16304(a)(6)).
4	3.2.3(b)	26	Air Quality	During operation of the Proposed Project, the primary activities that would generate pollutant emissions would be daily vehicle traffic, delivery truck traffic, and the potential use of a back-up fuel powered generator during power outages.	The document would be improved if it summarized the data modeled in the emissions study, including the assumptions made for operational equipment (e.g. equipment for each of the buildings, equipment usage durations).
5	3.2.3 (d)	28	Air Quality	Additionally, there are approximately twelve (12) other cultivation operations within 1 mile of the Proposed Project area (Figure 4), and another proposed commercial cannabis operation is consistent with surrounding land uses. The size of the parcel, topography, and distance to	Although, the IS/MND states that the "size of the parcel, topography, and distance to sensitive receptors would reduce any odors emitted from commercial cannabis activities," the IS/MND would be improved if it provided a more detailed analysis of how these factors will reduce odor impacts to the nearby residences.

Comment No.	Section Nos.	Page No(s)	Resource Topic(s)	IS/MND Text	DCC Comments and Recommendations
6	3.2.4 (a)	34	Biological Resources	<p>The Report suggested that, due to the ungrazed nature of the Proposed Project area, badgers may prefer the grazed meadows located nearby the Proposed Project area.</p>	<p>Additionally, the IS/MND should analyze the cumulative odor impacts from the 12 cannabis operations within a mile of the Proposed Project.</p> <p>Page 1 of the IS/MND states that “The proposed project would occur on a grassland area currently used for cattle grazing.” The IS/MND would be improved if it consistently described the current use of the Proposed Project site throughout the document and incorporated this description in its analysis.</p>
7	3.2.4 (a)	35	Biological Resources	<p>The Biological Report did find that there is moderate suitable habitat for Northern Spotted Owls in the area surrounding the Proposed Project, however, as long as the Proposed Project does not generate noise levels of 70 dB or greater and does not produce light pollution, no impacts to Northern Spotted Owls would be anticipated</p>	<p>The IS/MND should describe whether and how these requirements would be met by the Proposed Project.</p>
8	3.2.4(a)	34-36	Biological Resources	<p>N/A (General Comment)</p>	<p>The IS/MND would be improved if it included an analysis of impacts to candidate sensitive, or special-status species as a result of Proposed Project operations, including light, noise, and vehicle and delivery truck traffic.</p>

Comment No.	Section Nos.	Page No(s)	Resource Topic(s)	IS/MND Text	DCC Comments and Recommendations
9	3.2.5	40	Cultural Resources	On September 7, 2021, consultation requests were sent to all Native American groups included in the consultation list of tribes received from the NAHC.	The document would be strengthened if it included a list of the tribes that were contacted.
10	3.2.6(b)	45	Energy	N/A (General Comment)	The document would be strengthened if it described how the Proposed Project would comply with DCC regulations relating to the use of renewable energy in cultivation projects. (Cal. Code Regs., tit. 4 § 16305.)
11	3.2.8(a)	53-54	Greenhouse Gas Emissions	N/A (General Comment)	The document would be improved if it described the data modeled in the Greenhouse Gas Emissions (Table 9), including the assumptions made for operational equipment (e.g., number of vehicles, equipment for each of the buildings, equipment usage durations).
12	3.2.10(a)	64	Hydrology and Water Quality	The SMP would include erosion prevention and sediment control BPTC Measures designed to prevent, contain, and reduce sources of sediment. The SMP also includes corrective actions to reduce sediment delivery and prevent erosion.	The IS/MND would be improved if it described or summarized the BPTC measures and corrective actions that would be implemented.
13	3.2.10	65	Hydrology and Water Quality	Two existing culverted stream crossings are proposed to be upgraded to ensure passage of the 100-year streamflow event.	If the culverted stream crossing upgrades are part of the Proposed Project, the impacts resulting from this upgrade of these two crossings should be evaluated and included in

Comment No.	Section Nos.	Page No(s)	Resource Topic(s)	IS/MND Text	DCC Comments and Recommendations
14	3.13(a)	77	Noise	<p>Noise sources that would be generated by the operation of this project would include fans in the greenhouses, employee vehicle traffic, delivery truck traffic, equipment use, and the back-up generators during power outages.</p> <p>The Proposed Project would be conditioned to comply with the County's noise regulations which would ensure that impacts from the Proposed Project would be less than significant.</p>	<p>the analysis of each resource chapter, particularly Biological Resources (section 3.2.4 (b)).</p> <p>In addition, Page 37 states that the "site has been designed to meet minimum setback requirements and no work would be done directly within the riparian areas" and page 65 also states that "No construction would occur in or within 150 feet of Class I (perennial) watercourses, 100 feet of Class II (intermittent) watercourses, or 50 feet of Class III (ephemeral) watercourses." The IS/MND should describe how these restrictions would affect proposed work that will occur within the stream channels.</p>
					<p>The IS/MND would be more informative if it provided an analysis, supported by data, of how the operational noise sources listed (i.e., fans in the greenhouses, employee vehicle traffic, delivery truck traffic, equipment use, and the back-up generators during power outages) would meet applicable noise standards and conditions. In addition, the types of equipment included in the term "equipment use" should be identified.</p>

Comment No.	Section Nos.	Page No(s)	Resource Topic(s)	IS/MND Text	DCC Comments and Recommendations
15	3.21(b)	87	Mandatory Findings of Significance	The Proposed Project's consistency with the CCLUO and the County FEIR, and its incorporation of required mitigation measures and conditions of approval, provide another basis for the County to determine that the Proposed Project would not result in cumulatively considerable impacts.	The IS/MND would be more informative if it identified whether the Proposed Project would make a considerable contribution to any cumulative impacts from these other projects, especially with respect to transportation and odor. (See GC 4 and Specific Comment 5.)

Conclusion

DCC appreciates the opportunity to provide comments on the IS/MND for the Proposed Project. If you have any questions about our comments or wish to discuss them, please contact Kevin Ponce, Senior Environmental Scientist, at (916) 247-1659 or via e-mail at Kevin.Ponce@cannabis.ca.gov.

Sincerely,

Rains, Lindsay@Cannabis Digitally signed by Rains, Lindsay@Cannabis
Date: 2022.08.25 07:31:22 -07'00'

Lindsay Rains
Licensing Program Manager

August 18, 2022

Humboldt County
Attn: Desmond Johnston
3015 H Street
Eureka, CA, 95501

HUMBOLDT COUNTY (COUNTY), MITIGATED NEGATIVE DECLARATION (MND) FOR THE CISCO FARMS, INC. CANNABIS CULTIVATION FACILITIES PROJECT (PROJECT); SCH #2022070433

Dear Mr. Desmond Johnston:

Thank you for the opportunity to review the Mitigated Negative Declaration for the proposed Project. The State Water Resources Control Board, Division of Drinking Water (State Water Board, DDW) is responsible for issuing water supply permits pursuant to the Safe Drinking Water Act. The proposed Project may create a new public water system. If it does, it would require issuance of a new water supply permit. A project requires a permit if it includes creation of a new public water system or a permit amendment if it includes changes to a water supply source, storage, or treatment.

The State Water Board, DDW, as a responsible agency under CEQA, has the following comments on the County's draft MND:

- The State Water Board, DDW regulates public water systems in Humboldt County. "Public water system" means a system for the provision of water for human consumption through pipes or other constructed conveyances that has 15 or more service connections or regularly serves at least 25 individuals daily at least 60 days out of the year (Health and Safety Code, Division 104, Part 12, Chapter 4, Article 1, section 116275 [h]). Please indicate in the document the number of people that will be served water for human consumption at least 60 days out of the year.
 - If your system will meet the definition of a public water system, under "Other public agencies whose approval is required" please add "The State Water Resources Control Board, Division of Drinking Water will also require approval of a new water supply permit for the new public water system that will be developed."

If your system will meet the definition of a public water system, once the MND is adopted, please forward the following items in support of new water system's permit application to the State Water Board, DDW Klamath District Office at DWPRedding@waterboards.ca.gov:

- Copy of the draft and final MND, including the Mitigation Monitoring and Reporting Plan, with any comment letters received and the lead agency responses as appropriate;
- Copy of the Resolution or Board Minutes adopting the MND; and
- Copy of the date stamped Notice of Determination filed at the Humboldt County Clerk's Office and the Governor's Office of Planning and Research, State Clearinghouse.

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

Please contact Lori Schmitz of the State Water Board at (916) 449-5285 or Lori.Schmitz@waterboards.ca.gov, if you have any questions regarding this comment letter.

Sincerely,

Lori Schmitz

Lori Schmitz
Environmental Scientist
Division of Financial Assistance
Special Project Review Unit
1001 I Street, 16th floor
Sacramento, CA 95814

Cc:

Office of Planning and Research, State Clearinghouse

Barry Sutter
District Engineer
Klamath District

Cisco Farms Inc. Cannabis Cultivation Facilities IS/MND Comment

Roman, Isabella@DTSC <Isabella.Roman@dtsc.ca.gov>

Wed 8/24/2022 4:33 PM

To: Holtermann, Michael <mholtermann@co.humboldt.ca.us>

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

Hello,

I represent the Department of Toxic Substances Control reviewing the Initial Study/Mitigated Negative Declaration (IS/MND) for the Cisco Farms Inc. Cannabis Cultivation Facilities project.

The IS/MND states that the site has historically been used for agricultural activities. The text does not discuss these past land uses in relation to potential contamination at the site. Past land uses could have resulted in hazardous materials releases within the project area that should be investigated for public health protection. Past land uses could indicate the need for conducting a Phase 1 Environmental Site Assessment (ESA), Phase 2 ESA or other environmental sampling activities. Historical agricultural activities may have impacted soil and/or groundwater onsite, which would be disturbed throughout construction and operation. During project construction, construction workers would contact the soil. The text is unclear whether planting would be in-ground during project operation. During operation, groundwater would be used for non-irrigation purposes (e.g, drinking water). The text does not discuss testing or treatment of this groundwater.

Please feel free to reach out if you have any questions or concerns.

Sincerely,



Isabella Roman (*she/her/hers*)

Environmental Scientist

Site Mitigation and Restoration Program

(510)-540-3879

Isabella.Roman@dtsc.ca.gov

Department of Toxic Substances Control

700 Heinz Avenue, Berkeley, California 94710

California Environmental Protection Agency

From: [Holtermann, Michael](#)
To: [Giannini, Trip](#)
Subject: Fw: Benemann 17384
Date: Thursday, November 10, 2022 12:01:44 PM

From: Ryan Bridges <hillsideag@gmail.com>
Sent: Thursday, November 10, 2022 11:27 AM
To: Holtermann, Michael <mholtermann@co.humboldt.ca.us>
Subject: Benemann 17384

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

To whom it may concern,

My name is Ryan Bridges, I'm writing today in support of Karl Benemann and his proposed cannabis project (PLN-2021-17384) at 1414 Chambers rd., Petrolia. I've been a resident of Petrolia for 24 years and a property owner for 16. My parcel borders the proposed project site (5337 Conklin Creek Rd) During my time in the Mattole I've come to know Karl and his family well. I have absolute faith that this project will be done in a way that is respectful to the community and natural resources. Job creation is also a plus. I support the county approving this project.

Thank you,

Ryan Bridges
P.O. Box 207
Petrolia, CA.
95558

(707) 599-4646

--

Ryan Bridges

Hillside Ag. Consulting
P.O. Box 193
Petrolia, CA. 95558

707-599-4646
hillsideag@gmail.com