

McClenagan, Laura

From: Josh Ennis <joshjennis@gmail.com>
Sent: Wednesday, September 15, 2021 11:27 PM
To: Planning Clerk
Cc: Holtermann, Michael
Subject: North Fork Mattole Farms LLC, PLN-2020-16766, APN 105-051-009

Re: North Fork Mattole Farms LLC
PLN-2020-16766
APN 105-051-009

To the Humboldt County Zoning Administrator and Planners,

After reviewing in full the Zoning Administrator Resolution 21- Record Number: PLN-2020-16766 Assessor's Parcel Number: 105-051-009, which conditionally approves the North Fork Mattole Farms LLC, Special Permit Request, I wish to comment on this proposed project.

I would be remiss if I were not to first acknowledge the benefits of cannabis. Producers/processors and consumers alike have reaped huge benefits. Locally, it's production has been an economic and cultural boon for many, with positive effects rippling back out into the surrounding community.

However, this resolution and project proposition is flawed in it's current state.

The location of this property is central to the town of Petrolia. It borders the town square, our post office, our volunteer fire department, our general store, our elementary school, and the community center. It also intervenes between the two main collections of higher density housing—one cluster resides on the town square, while the other is clustered around Old Coast Wagon Rd, Mattole Road north of the bridge, and Conklin Creek Rd. If approved in it's current form, this project would dramatically escalate the transformation already-in-progress of rural open space in the middle of town into an industrial space—one that is visible, audible, and palpably felt from all locations central to Petrolia. The Resolution's assertion that "approving cultivation on this site...will not change the character of the area due to the large parcel sizes in the area" is categorically false, and frankly ignorant. *This location is central to all things Petrolia.* I would love to see this central parcel developed further, but in a thoughtful manner, consistent with the spirit of it's community.

I would also contend that parts of this project are **not** consistent with general agriculture use, nor the Open Space Action Plan. Although this use type is permitted in Agriculture Grazing (AG) land use designation, it is inappropriately applied to half the project. Characterizing 20,000 square foot light deprivation cannabis cultivation entirely in greenhouses as general agriculture is a faulty interpretation of general agriculture and, in fact, at complete odds with the Open Space Action Plan. Chapter 10.2 in the Humboldt County General Plan details the Open Space Plan and Open Space Action Program, describing our county as having "vast and beautiful natural resources..." with topics embodied within our own County plan that must be addressed by state planning law. Among these topics is "Open Space for the preservation of natural resources." Further, Section 10.7 on Scenic Resources titles a section Open Space and Agricultural Lands, opening the background section by affirming "agricultural land vistas are to many a quintessential characteristic of Humboldt County." Light deprivation cannabis cultivation in 20,000 square foot of power-hungry greenhouses is not general agriculture, is inconsistent with our Open Space Action Plan, and right in the middle of town violates what most residents and visitors alike enjoy most about the lower Mattole Valley and Lost Coast. On the other half of the proposed project, I commend the use of full sun outdoor dry farmed cannabis cultivation as this land use seems much more appropriate to general agricultural use, is more likely to be environmentally sustainable, and acknowledges a more natural resource utilization without exploitive cultivation practices. A land vista of row crops rather than rows of greenhouses would get closer to honoring the spirit of the Open Space Plan and Action Program.

Although environmental and health/safety concerns arise, they may be mitigated with planning, accountability, and transparency. I do commend the developers for their engagement with the community. And in fact, the developers may already have satisfactory answers for some of my concerns. However, I discuss them here for completeness. These concerns include water, power, construction/greenhouse materials, and incipient traffic becoming worse. Will there really be 72 water tanks? Wow. That's a lot of water that doesn't make it into the ground to replenish aquifers, and the river. This year may be the first year that I see the Mattole River dry up in some stretches. Where will the salmon go? The resolution also details solar with a backup generator, but what is the timeline for developing solar, and who will hold the developers accountable to this timeline? Fossil fuels should not grow cannabis, the sun should. How will the greenhouses be constructed? Will they be make-shift plastic hoop houses that fall apart and litter the area, or will they be built to last? The traffic increase right around the neighboring school and community center will be significant with this project. There have been many near-collisions with pedestrians the past few years right on this stretch of road adjacent to the private driveway access off Old Coast Wagon Road. Can this project be better paired with developing a public path and/or sidewalk to increase pedestrian and biker safety? Again, this parcel lies in between the two clusters of denser housing, with the community center and school central to those, so pedestrians and biker traffic is common on this stretch of road.

Lastly, the valuation of land in many parts of rural Humboldt has been driven by cannabis productivity and profitability. This has contributed to driving up real property prices, with the sad result of pricing out families and others that want to live here. I have witnessed several families who contribute to the community in a positive way and have a desire to stay in Petrolia, but ultimately leave because they are unable to afford their own place. Certainly there are other forces at play with real estate but projected gross revenues from cannabis cultivation has contributed significantly to driving up prices, sometimes making cannabis a necessary evil in any new land acquisition. This cycle needs some cool water thrown on it.

I embrace sustainable development and cannabis. And I would much prefer a project of this size not to be so centrally located right in the middle of town. Approval in it's current form cuts to the heart of this community, however, which I cannot support; if passed, this resolution needs amendment. Please put the plants in the ground, in the sun, and cut the size to a more modest figure consistent with other cultivation sites in the immediate vicinity of the town center.

Sincerely,
Josh Ennis