

## McClenagan, Laura

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**From:** Susan Nolan <snolan@humboldt1.com>  
**Sent:** Monday, December 13, 2021 2:29 PM  
**To:** Planning Clerk  
**Subject:** Humboldt Hempire Farms, PLN-2020-16602

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear planning commissioners,

Thank you for accepting my comments on the Humboldt Hempire Farms cannabis cultivation application, record no. PLN-2020-16602, APN 223-061-011. The planning staff has done a good job of examining the proposal. This is a troubling plan. It bends or breaks the rules, and the applicant himself has a long history of rule-breaking.

First, the proposed project is in conflict with the CCLUO.

As planning staff points out in their recommendation, the project is to be sited in an area where mature trees were growing in 2016 and removed without permit, in violation of Section 314-55.4.6.4.2. This is clearly documented in aerial photos. In addition, I would like to point out that the project is reliant on bladders for irrigation, and bladders are prohibited in the CCLUO (Section 55.4.12.8). No provision is made in the ordinance for accepting bladders which were permitted and pre-existing. There is a provision for bladders from pre-existing (unpermitted) grows to continue in use for two years, but those bladders must be removed and replaced within two years of permit approval. However, that was not invoked in this plan approval. The earlier decision to allow these is not in line with the CCLUO and opens the door for other operators to set up permitted bladders and later transfer them to cannabis use.

Secondly, the applicant has a long history of outlaw involvement with cannabis. Mr. Jeffries was sentenced to six years in prison in 2009 for large scale unpermitted cannabis cultivation and money laundering. This was not a matter of maintaining a small grow at home, but a large criminal enterprise at multiple sites.

After his release, Mr. Jeffries started work in the fall of 2015 on his water bladder project without permits (it was eventually permitted). In addition to the catchment tarps in his eventual permit, he also filled the bladders with water from the river and Connick Creek, having disturbed both streamsites without a permit. CDFW discovered he kept two sets of records for water sales. I would like to point out that the water in those bladders would have been sold to unpermitted grows, as trucked-in water is not allowed for legal grows except in emergencies (55.4.12.2.5).

Besides the various issues with the bladders, an unpermitted grow discovered in 2018. Again, the unpermitted logging; there was a second incident besides the one at the proposed building site.

One difference between permitted and unpermitted grows is that permitted grows get at least 24 hours notice before inspections: plenty of time to switch out the books, move proscribed chemicals offsite, etc.

The sheriff has objected to this project because of a current felony case. The sheriff does not often weigh in on planning decisions.

Everyone deserves a chance to come clean and join the mainstream. But there is no reason to believe that Mr. Jeffries intends to do anything besides get cover for business as usual here. His first operation was entirely outlaw; everything he has done since has mingled legal and illegal activity.

It is widely reported that the price of legal cannabis, which has been much lower than black market, has collapsed to the point where permitted growers are turning back to the black market to make ends meet. Yet Mr. Jeffries is eager to make a large investment in a permitted farm. It would be useful to ask how he intends to make it worthwhile.

Of course the county would like to bring growers into the fold of responsible legal activity. But please consider carefully if this is the kind of project that will take beneficial care of the land, be a good neighbor, and build the Humboldt brand.

Thank you very much,  
Susan Nolan.