

From: [Flora Brain](#)
To: [Planning Clerk](#)
Subject: Comment Re: Project Title: North Fork Mattole Farms, LLC, Record #: PLN-2020-16766
Date: Wednesday, September 15, 2021 4:47:46 PM

Re: Project Title: North Fork Mattole Farms, LLC, Record #: PLN-2020-16766

I have concerns regarding the North Fork Mattole Farms, LLC's permit application for their proposed grow at 29330 Mattole Road in Petrolia. While I personally know the applicants, and believe they have good intentions both to create a business that is profitable and to remain responsive to community feedback and distress, I have the following concerns.

Trends in the cannabis industry indicate that the feasibility of this plan, and its potential for the North Fork Mattole Farms, LLC partners to realize their desired economic success, are low. My biggest concern is that once this permit is granted, if the partners do not realize their hoped-for profit, it will then be feasible and possibly quite necessary for them to sell the parcel (with the approved permit) to interests in the cannabis industry who will be far less responsive to community concerns.

With that in mind, I object to the following components of the permit application:

- **Water use:** the planned rainwater collection volume being based on 60 inches annually is not conservative enough to be reliable for this area of the Lower Mattole Valley floor. While the current partners have good intentions to dry farm and adjust to limited water availability year to year, *and may* be willing to accept reduced yields and reduced profits, I would not expect as much from most cannabis business owners with similar operations. The water storage tanks are located right next to an existing well. There is every reason to believe that business owners seeking secure profits in an industry limited by water and drought will fill, and/or refill the water storage tanks via the convenient well. This happens widely throughout Humboldt County with little to no consequence. The resulting impacts to streams, rivers, and aquatic life are not acceptable, and constitute impacts to public trust resources, so I object to this component.
- **Generator use:** I object to the approval of a plan that relies partly upon "a backup generator until PG&E service is available." Additional PG&E service is highly unlikely to become available anywhere in Petrolia. While zoned as Ag, this operation exists in close proximity to residents on Petrolia's Main Street and Old Coast Wagon Road. Again, while I believe the current owners are responsive to nearby residents' concerns, I do not expect as much from subsequent owners. Thus I object to this component of the permit application.
- **Infrastructure for drying:** The high cost of construction of a large drying shed for flower incentivizes the use of cheaper solutions, such as industrial shipping containers. Once on site, they are likely to remain. This is not an industrial area, and the introduction of industrial shipping containers is offensive.
- **Plastic:** While I laud the current partners' plan to focus on dry farming, this permit application contains 10 (ten) 2,000 square foot greenhouses for light dep. I feel the County should be limiting approvals of additional plastic greenhouse infrastructure in our area, and should work to establish an industrial cannabis zone somewhere in Humboldt County that concentrates all greenhouse production in areas not directly adjacent to homes so as to relieve residents of noise, generator fumes, and other public nuisances associated with greenhouse cultivation. Many in our rural community feel that the Mattole Valley is a place that should be proud of the full sun outdoor cultivation we are best suited to host, and we want to support local farmers doing full sun outdoor. We do not welcome seeing more

greenhouses and hearing more fans and generators in close proximity to residences. Again, while I am not worried about the current partners creating such nuisances or being unresponsive to local residents, I do worry very much about future subsequent land- and business owners.

Regarding the water use concerns stated above, I have the following questions:

- Will the water storage tanks, planned to be filled via rainwater catchment and located in close proximity to an existing ag well, be metered?
- Given that the Petrolia rain gage that the state operated from 1958-1995, at 175' elevation just north of Petrolia, averaged 62.43" annually, with a minimum of 27.24" in 1977, AND given that the cocoahs.org rain gauge site Station # CA-HM-73, Station Name: Petrolia 0.6 SSE (located roughly ½ mile to the SE of the proposed permit site) received annual TOTALS both of the last 2 water years of around 40", and given worsening drought conditions, what would the County suggest for an accurate conservative estimate for annual rainfall at this site?

Given my concerns, I request that this permit be scaled back to approve only the exclusive cultivation of full sun outdoor cannabis with rainwater catchment volumes based more directly on actual likely rainfall in the project area. That seems to be where the hearts of the current partners are anyway.

Thank you.