

June 20, 2022,

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

Dear Mr Lazar and Planning Commission,

I am writing to comment on Royal Gold Soil Operation Conditional Use Permit PLN-2021-17077 for 1619 Glendale Drive, 95519.

I've been a resident of Glendale since the days of operating lumber mills. I live and work here and for fun I study the environment and the engineered landscape. I know Glendale's industrial past. I also know that our natural resources and general industriousness are important contributors to Humboldt County's economy. Glendale is a great place to work.

Glendale is also a great place to live, and it is home to hundreds of folks who also contribute to the welfare of Humboldt. With space and easy access to Cal Poly Humboldt, our residential areas are expected to grow and infill. This is by County design (as per the General Plan). I do not think increasing operating hours to include Sunday is mindful of community expectations nor has been of historic norm. The community deserves one day free of industrial noise. Seriously, the backup beeps from heavy equipment travel more than half a mile and need a rest.

There is a cost to having more people and more industrial activity side by side and this often comes in the form of restrictions due to rules and regulations. No one likes rules and regulations, but most of us enjoy the resulting benefits. Rules that help ensure safe water and clean air, limits on sound, and light pollution, are a few things that come to mind. More of us can live together in happiness when we agree that some things are more important than personal freedom to ruin water and air. It's not all about cost and restrictions but greater benefit.

One such benefit is that our neighborhood supports a market. It is amazingly special to have Murphy's Market. Murphy's is here because lots of people live and work around here.

In this regard I am grateful to see that Royal Gold is taking steps to come into compliance regarding storm water runoff and fugitive dust. The water that enters our streams and the dust and noise from the current wind whipped system is problematic and has wide spread influence beyond their property's perimeter.

Beyond Royal Gold's perimeter is the Mad River with Hall Creek in-between and a watershed that flows into it. Connecting Royal Gold directly to Hall Creek is a "seasonal stream." This seasonal stream is being referred to as a drainage ditch but in actuality it contributes water to Hall Creek for a longer period of time than Noisy Creek. This ditched creek not only contributes water to Hall Creek but is a direct pathway from Royal Gold to the Mad River.

Whatever happens at Royal Gold will end up in the Mad River. We've had several flood events in the last fifty years that suggest what is planned for in Royal Gold's MND is not sufficient. This not only includes potential harm from new materials such as fertilizer, but could mobilize legacy toxins from previous activities. PCPs and Dioxins are known to be on-site in dangerous amounts. Reports from the California Department of Toxic Substance Control show that Dioxin is even showing in surface water. This certainly appears to be a red flag worth addressing. I am grateful to see as part of the MND more rigorous testing.

The toxic problem that Royal Gold sits on is not well understood nor should it be Royal Gold's liability to figure it out. However, every measure should be taken to find and remove the toxic sources. Protecting Hall Creek not only protects the water supply for the Humboldt Bay Municipal Water District, but it protects it for wildlife.

In addition to our industry and personal homes, wildlife is the third pillar of Glendale. Glendale has Roosevelt elk, northern red legged frogs, foothill yellow legged frogs, giant Pacific salamander, and anadromous fish. Glendale has coho, and lamprey!

Glendale is truly special with prime habitat for coho salmon, a federally protected endangered species. With a community desire to help bring them back we could have countless hundreds of adult fish return rather than a few dozen or so we have today.

The fish we do have are beneficiaries of efforts from past projects to improve Hall Creek for their needs. New development should be cognizant of these efforts and eager to help with solutions. NOAA Federal is working with Glendale to restore coho habitat.

In the last twenty years the Hall Creek watershed has seen numerous restoration projects designed to improve habitat for Coho. More is to come and we can all do better to help that process.

Coho come to Glendale to spawn. They need our slow moving cool creeks in order to survive. This is their rightful home. When folks make argument that GLENDALE HAS ALWAYS BEEN INDUSTRIAL, please know this is not so. Glendale was first home to a natural system shaped by thousands of years and rapidly changed in one century.

There is no going back, but the fact that we still have coho is testament to nature's resilience and is something, with a little care, we can all be proud of. In this regard we are all part of Glendale's coho story.

Royal Gold, the County, and others can join in to help the coho and support stream side protection for their return. It's a much better story to tell than the one of Royal Gold filling in wetlands while sitting on toxic ground that if disturbed could release poison into their product as well as our water and air.

Thank you kindly for your consideration,

Joseph Wilhelm

Joseph Wilhelm ----- (707) 826-7184
meridianphoto.com / josephwilhelm.com