

April 20, 2022

Planning Commission
Humboldt County, CA

Re: April 21st Planning Commission Meeting #G-1
Nava Ranch, Inc: Special Permit^[SEP] Record Number PLN-2021-17162
(filed 4/15/2021)^[SEP] Assessor's Parcel Number (APN) 107-106-
006^[SEP] Honeydew Area

Dear Commissioners,

The application for this project was not ready when it first was presented to your Commission on March 3rd, 2022.

After reading the attachments on this current agenda item, we do not see where concerns which were raised previously have been addressed, remedied or mitigated.

This application is for enlargement of the “existing” cultivation by a **factor of seven times**. There is not the developed infrastructure to support this enlargement and conversion to “Mixed Light.”

The analysis of the irrigation requirements for this enlargement, and how the water will be gathered and stored, is not adequate, or logical. The applicant plans to fill their “proposed” tanks from their “proposed” rain catchment ponds. Due to the ongoing drought, I have not seen a full pond yet this year. One must necessarily fill rain catchment ponds before filling tanks.


The Applicant plans to have water for their employees by importing “water bottles and water jugs” for hand washing and drinking water. Additionally, the plan continues to assert that they will **hand water** three cycles/harvests on an entire acre. This is not only the most inefficient and wasteful way to irrigate, it is completely unrealistic.

In the original March 3rd plan, it claims water usage of 315,000 gallons of water a year (6.83 g/p/a). This did not add up. Now the current project description states a usage of 550,000 gallons of water per year (11.94 g/p/y). This does not add up either. And it is

impossible to tell what the true water use will be. Is the 11.94 per square foot figure regardless of the number of cycles? This is unclear and insufficient information to determine accurate water use.

Presently, the Applicant uses a generator (the proposed emergency generator) as the power source for their current mixed light. If they have green PG&E power why are they not using that now?

The Bureau of Land Management (BLM), a direct neighbor, submitted considerable concerns about this project, and yet County Staff has dismissed them because they did not submit these concerns for the “existing” cultivation. **This project is 7 times larger.** The impacts from this level of enlargement would of course produce more significant and cumulative impacts.

 Waterlines reaching from Bear Trap Creek to the site have been reported as recently as July 2021 and were the subject of BLM law enforcement investigations in the past. Internal staff observations have noted that Bear Trap Creek now regularly dries up prior to reaching Honeydew Creek.

Bear Trap Creek, in the western portion of the application site, is habitat for the listed Coho and Chinook salmon and steelhead species. The neighboring Honeydew Creek to the east side of the parcel is eligible for inclusion into the national Wild and Scenic Rivers System due to the quality of its spawning and rearing habitat for Coho and Chinook salmon, and steelhead. For these reasons, BLM lands are managed to conserve and protect these species and their habitats. The Mattole River and its tributaries are listed as sediment-impaired under the Clean Water Act. The proximity of the proposed project area has the potential to deliver nutrients and other pollutants to these sensitive waterways.

And, adjacent BLM lands are designated as Critical Habitat for the Northern Spotted Owl (NSO) by the U.S. Fish and Wildlife Service (USFWS). There is a potential for light, generator noise, and runoff from the applicant’s operation to impact this BLM land and the sensitive wildlife species present, such as the NSO. The NSO continues to suffer population loss across its range due, in part, to habitat loss and human encroachment. The BLM is rightfully concerned about the proximity of this proposed cannabis operation to

NSO critical habitat and a historic NSO activity center.

Additionally, County Staff has dismissed the neighbors' concerns because upon inspection of these concerns, Staff found violations on the complaining parties' property. Absurdly, one of those violations was not paying a deposit for an inspection. Certainly this is not grounds for dismissing valid concerns outright.

Regarding Fire Safety – there is a chart you receive which states that Honeydew Volunteer Fire signed off on this application. Please note that when given these applications by the County, all the Local Volunteer Fire Departments do is confirm that they are in the area of service and the applicant should post their address on the road. **This does not mean the Fire Department deems this applicant and their project as acceptable or Fire Safe. In fact, the Applicant had a fire on this property in the past, and did not call 911; fortunately, a neighbor called it in.**

If the Project is permitted, many of the neighbors' concerns will need to be addressed by consistent monitoring and enforcement by Humboldt County staff. Currently, this standard is not being met on many projects throughout Humboldt County. This project expansion should be denied for this reason alone.

The problems with this application, in it's current form, are numerous. The information provided is incomplete & inadequate.

Please deny this project.

Thank you,

Robie Tenorio
Citizens for a Sustainable Humboldt