

From: [cindy taylor](#)
To: [Planning Clerk](#)
Subject: PLN-12618-CUP. BLM Holdings
Date: Monday, July 12, 2021 4:57:19 PM

To whom it may concern:

We are Joan Becker and Cindy Taylor, and we have resided at 3545 Miller Creek Road for close to 40 years. After spending many hours reading BLM Holdings application, talking with several neighbors and meeting with Dan Kulchin at the farm, we are writing in support of this CUP for APN 220-331-001.

Thank you, Joan and Cindy. 707.499.1476

From: [Jeff and Marisa St John](#)
To: [Planning Clerk](#)
Cc: [Madrone, Steve](#)
Subject: July 15, 2021 Agenda Items - Public Comment
Date: Monday, July 12, 2021 12:00:16 PM
Attachments: [image.png](#)
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Hello Planning Commissioners,

Please consider the following before making your decisions (many of the concerns apply to all/most of the agenda items):

1. 21-979 BLM Holdings, LLC., Conditional Use Permit

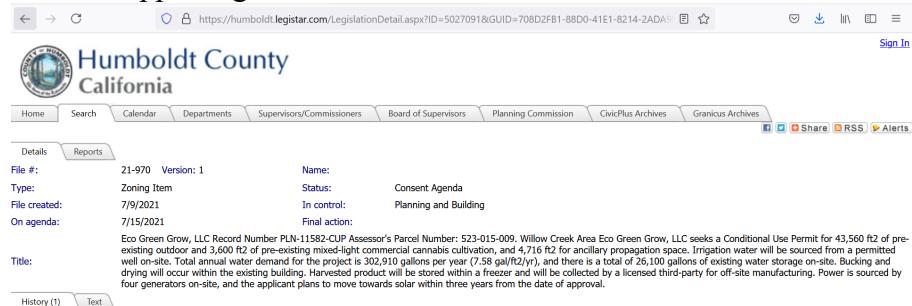
- 1.1 The only attachment was the County's Staff Report. It does not include any of the referenced other documents that would enable the public to effectively review and comment about this project.
- 1.2 The applicant talks about two future associated projects. How would they impact what is being proposed for the current project (ex. additional traffic, water usage, etc.)? What would the applicants do if the future projects were not approved (ex. how would this impact their business plan)?
- 1.3 What is the cumulative effect (immediate local, general area, watershed, water usage, etc.) of this proposed project?



The screenshot shows the Humboldt County Legistar website. The page title is "Humboldt County, California". The navigation menu includes Home, Search, Calendar, Departments, Supervisors/Commissioners, Board of Supervisors, Planning Commission, CivicPlus Archives, and Granicus Archives. The "Details" tab is selected. The case number is 21-979, Version 1. The Type is Zoning Item, created on 7/9/2021, and is on agenda on 7/15/2021. The Status is Consent Agenda, and it is in control of the Planning and Building department. The title of the case is "BLM Holdings, LLC Record No. PLN-12618-CUP APN 220-331-001. Garberville Area A Conditional Use Permit for 37,894 square feet of existing outdoor and mixed light cannabis cultivation. Water for irrigation will be provided by a onstream pond. The applicant anticipates 183,600 gallons of water will be required annually for irrigation. Water storage onsite totals 75,000 gallons occurring in six (6) 5,000-gallon tanks, eleven (11) 3,000-gallon tanks, and five (5) 1,500-gallon tanks. Processing such as drying, and curing will occur onsite within an existing permitted residence. The applicant is proposing to construct a new processing facility in the future. Further processing such as trimming, and packaging will occur offsite at a third party licensed processing facility. The applicant anticipates up to three employees. Power will be provided by PG&E." An attachment is listed: "1. 12618 BLM Holdings Staff Report FINAL 7.15.21.pdf".

2. Lack of Documentation and Cumulative Effect Analysis

2.1 No Supporting Documentation



The screenshot shows the Humboldt County Legistar website. The page title is "Humboldt County, California". The navigation menu includes Home, Search, Calendar, Departments, Supervisors/Commissioners, Board of Supervisors, Planning Commission, CivicPlus Archives, and Granicus Archives. The "Details" tab is selected. The case number is 21-970, Version 1. The Type is Zoning Item, created on 7/9/2021, and is on agenda on 7/15/2021. The Status is Consent Agenda, and it is in control of the Planning and Building department. The title of the case is "Eco Green Grow, LLC Record Number PLN-11582-CUP Assessor's Parcel Number: 523-015-009. Willow Creek Area Eco Green Grow, LLC seeks a Conditional Use Permit for 43,560 ft2 of pre-existing outdoor and 3,600 ft2 of pre-existing mixed-light commercial cannabis cultivation, and 4,716 ft2 for ancillary propagation space. Irrigation water will be sourced from a permitted well on-site. Total annual water demand for the project is 302,910 gallons per year (7.58 gal/ft2/yr), and there is a total of 26,100 gallons of existing water storage on-site. Bucking and drying will occur within the existing building. Harvested product will be stored within a freezer and will be collected by a licensed third-party for off-site manufacturing. Power is sourced by four generators on-site, and the applicant plans to move towards solar within three years from the date of approval." An attachment is listed: "History (1) Text".

https://humboldt.legistar.com/LegislationDetail.aspx?ID=5027108&GUID=68FC2836-F8B0-40C2-B110-12D0C

Humboldt County California

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Details Reports

File #: 21-974 Version: 1 Name:

Type: Zoning Item Status: Consent Agenda

File created: 7/9/2021 In control: Planning and Building

On agenda: 7/15/2021 Final action:

Tony Palamara, Stacy Palamara, and Rachel Starr Record Number PLN-11952-CUP Assessor Parcel Number (APN) 216-261-053. Alderpoint area A Conditional Use Permit for 24,000 square feet (SF) of existing outdoor cannabis cultivation of which 16,727 SF is full-sun outdoor, 1,912 SF utilizes light deprivation in one (1) hoop house, and 4,000 SF utilizes mixed light in one (1) greenhouse. Ancillary propagation will occur in a proposed 2,400-square-foot greenhouse. Irrigation water will be sourced from a groundwater well. Existing available water storage is 3,800 gallons in two (2) hard tanks. Estimated annual water usage is 219,947 gallons. Processing activities including drying, curing, trimming, and packaging occurs onsite in an existing 4,000-square-foot two (2) story building. Power is provided by an EPA rated Tier 4 diesel generator, but will be transitioning to PGE.

History (1) Text

2.2 No Cumulative Effect Analysis of Current and Future Proposed Changes

https://humboldt.legistar.com/LegislationDetail.aspx?ID=5027092&GUID=7F212216-8F9F-4706-B500-65E55

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Details Reports

File #: 21-971 Version: 1 Name:

Type: Zoning Item Status: Consent Agenda

File created: 7/9/2021 In control: Planning and Building

On agenda: 7/15/2021 Final action:

Kinsey Ridge, LLC Record Number PLN-11841-CUP Assessor Parcel Number (APN) 215-045-004. Willow Creek area A Conditional Use Permit for continued cultivation of 13,000 square feet (SF) of existing outdoor cannabis cultivation. Ancillary propagation occurs within a 120-square-foot hoop house. Water for irrigation is sourced from rain catchment and storm water from the roof of the on-site residence and other structures is captured in gutters and transported to rainwater catchment tanks. The applicant proposes to drill a well onsite as an additional water source. Existing available water storage onsite is 11,700 gallons in a series of hard-sided tanks. The applicant also proposes an additional 250,000-gallon rain catchment pond for a total of 261,700 gallons of onsite water storage. Estimated annual water usage is 80,000 gallons. Drying and bucking occurs onsite while processing will occur off site at a licensed processing or manufacturing facility until a proposed 900 SF onsite process...

Attachments: 1. 11841 Kinsey Ridge LLC Staff Report FINAL 7.1.21.pdf, 2. Attachment 3A 11841 Operations Manual With Addendum 11.27.2019.pdf, 3. Attachment 3B 11841 Site Management Plan 11.27.2019.pdf, 4. Attachment 3C 11841.11019 Road Eval. 12.30.19 (works for 11841).pdf, 5. Attachment 3D 11841 Biological Report 06.23.2020.pdf

https://humboldt.legistar.com/LegislationDetail.aspx?ID=5027106&GUID=2BCBD268-8264-492C-BEF6-DE9A

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Details Reports

File #: 21-972 Version: 1 Name:

Type: Zoning Item Status: Consent Agenda

File created: 7/9/2021 In control: Planning and Building

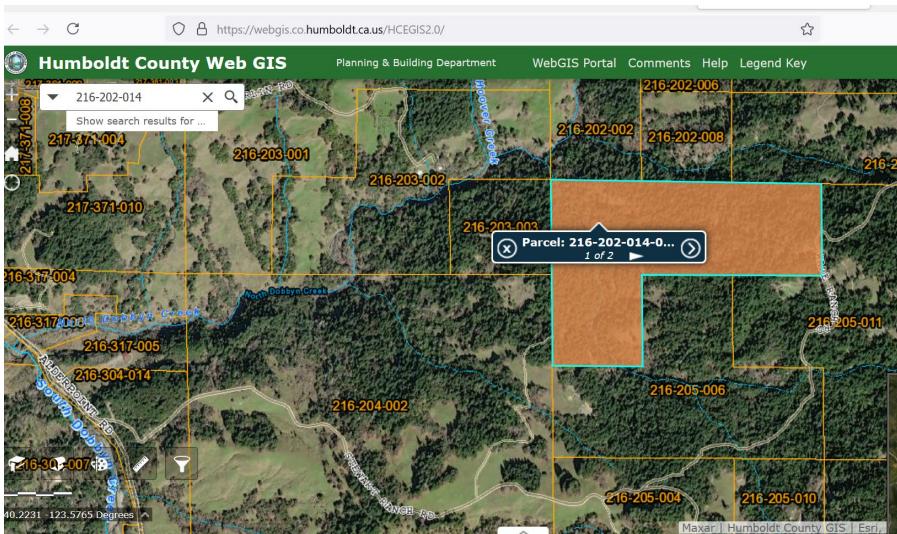
On agenda: 7/15/2021 Final action:

Cannatopia Record Number PLN-11854-CUP Assessor Parcel Number (APN) 216-205-006. Alderpoint area A Conditional Use Permit for 20,000 square feet (SF) of existing outdoor cannabis cultivation of which 10,000 SF is full-sun outdoor and 10,000 SF is outdoor cultivated within eight (8) greenhouses utilizing light deprivation techniques. Ancillary propagation occurs within a 3,000-square-foot greenhouse. Irrigation water is sourced from a groundwater well. Existing available water storage is 76,900 gallons. An additional 50,000 gallons of water storage proposed on-site, for a total of 126,900 gallons of onsite water storage. Estimated annual water usage is approximately 199,940 gallons. Drying and curing occurs onsite, and, depending upon market conditions, processing may occur on- or offsite, or be sold directly for extraction. Power is provided by two (2) generators, with long-term plans to connect to grid power from Pacific Gas and Electric Company (PG&E) when financially feasible.

Attachments: 1. 11854 Cannatopia Staff Report FINAL 7.15.21.pdf

3 Multiple Projects on Contiguous Properties

There are two Cannatopia projects (216-205-006 and 216-202-014) on the agenda. In addition to the concerns stated above, the Planning Commission should consider the impacts collectively considered since they are side-by-side parcels being developed by the same applicant.



4. Another Request for Setback Reduction Versus Scaling Down the Proposed Project

Applicants should reduce the footprint versus requesting smaller setbacks. The County should track all of the setbacks that have already been approved and consider not approving anymore (there was a reason that the setback requirements were put in place).

Details Reports

File #: 21-975 Version: 1 Name:

Type: Zoning Item Status: Consent Agenda

File created: 7/9/2021 In control: Planning and Building

On agenda: 7/15/2021 Final action:

Dazey Farm, LLC Record Number PLN-12025-CUP Assessor Parcel Number (APN) 208-341-007. Dismore area A Conditional Use Permit for 17,492 square feet (SF) of existing outdoor commercial cultivation in 10 greenhouses. Auxiliary evaporation occurs in hydroseams totaling 1,000 SF. Irrigation water is sourced from two permitted groundwater wells and rainwater catchment. Existing water storage is 75,000 gallons. Estimated annual water usage is 360,000 gallons. Drying and bucking occurs onsite. All other processing will occur offsite at a licensed processing or manufacturing facility. Power is provided by two generators. The applicant is proposing to install an additional 9 kW solar array to meet site demands and further reduce generator use. The proposed project also includes Special Permits for a reduction in the 600-foot setback requirement from public lands and for development within the Streamside Management Area (SMA).

Title: 1. 12025 Dazey Farm LLC Staff Report FINAL 7.15.21.pdf, 2. Attachment 3A 12025 WPPP.pdf, 3. Attachment 3B Cobb Road Road Assessment 2020.pdf, 4. Attachment 3C 12025 FAA Determination of No Hazard 08.01.19.pdf

Attachments:

Sincerely,
Marisa Darpino
District 5

From: [Julia Anderson](#)
To: [Planning Clerk](#)
Subject: Project BLM Holdings, LLC, PLN-12618-CUP, for July 15 hearing
Date: Monday, July 12, 2021 2:00:12 PM

To: Planning Clerk, Humboldt County/ Planningclerk@co.humboldt.ca.us
Re: Project BLM Holdings, LLC, PLN-12618-CUP, for July 15 hearing
Public Comments

My name is Julia Anderson. I am a long time resident of Briceland and the Director of Beginnings, Inc. an adjacent landholder to this project.

Beginnings, Inc. is a nonprofit community center with an early childcare center and an elementary school on the campus. It was decided by the community that the 80 acres adjacent to this project property would remain as a wildlife preserve with no buildings or use that would negatively impact the natural environment. Since that time the only use or development on this acreage has been the maintenance of a fire safety and service road and the addition of a filtration structure and water holding tanks for the Briceland Community Water District and Beginnings, Inc. The major use of this area is for the children to explore our natural world as part of their education program.

My major concerns surrounding this project are:

Fire safety. A major concern for everyone. This project has significant use of power (likely including power generation) and around the clock operations. Will there be someone in residence and is there a fire safe plan? Fire can move very fast and we are located just over the hill and have upwards of 85 children on our campus from Sept. through June; and from June – August our preschool can have up to 24 - 2, 3 and 4 year olds. A very scary scenario to think about.

Water Use. *Current* source and usage specifics are extensive in this report and yet the future plans stated will require a great deal more water (tourism, horses, camping, additional processing facilities, etc.) with no reference to the future capacity of the water resources.

Employees. The project statement of a maximum of three “employees” with five parking spaces seems unlikely given the size of this project. The stated additional use of temporary employees from agencies for certain periods or as needed, leaves this area wide open which will greatly impact road use, water use, impact on neighbors, fire safety and so forth.

Lack of Agency Oversight. As citizens and community members, we look to organizations and agencies that are charged with the responsibility to assure that projects have met requirements. The lack of response from so many of these agencies may not indicate that there is no problem. I suspect it is more of an overload situation on the agencies and therefore this project has not had sufficient oversight by the agencies as required by law.

Violations on this project site. Were there earlier violations on this project site that have not been resolved? Why were the causes for Cal Fire's rejection of this project not addressed by the County? Have there been more violations on this property that are undetected at this time?

Residential location. This is a traditional “back to the land” family neighborhood. I believe that only commercial use of this road prior to this project were a piano teacher and a violin teacher. The impact of this large industrial business would be significant.

As Wendell Berry states, “The true remedy for mistakes is to keep from making them....”

Respectfully,

Julia Anderson

Director, Beginnings Inc.

Briceland resident