

**From:** [Jeff and Marisa St John](#)  
**To:** [Richardson, Michael](#); [Planning Clerk](#)  
**Cc:** [Madrone, Steve](#)  
**Subject:** Planning Commission 7/1/2021 21-909  
**Date:** Thursday, July 01, 2021 10:11:16 AM

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Hello,

Thank you for proposing amendments that would "increase the public review of RRR proposed projects" (CEQA Addendum).

Please postpone any decision regarding these amendments to the Zoning Ordinance Amendments to the Commercial Cannabis Land Use Ordinance (CCLUO), until:

1. CalCannabis weighs in on whether or not the supplement lighting is required by CalOSHA for worker safety (if yes, then restrict work to daylight hours and if no, then reapply for the license that allows for supplemental lighting). Refer to the Humboldt County Agricultural Commissioner's response to the single Public Comment.
2. Humboldt County Planning and Building Department shares their scientific research and analysis on why these proposed changes would:
  - 2.1 "Incentivise" the 4000+ illegal growers (<https://www.times-standard.com/2021/06/29/illicit-cannabis-grows-remain-in-the-thousands-humboldt-county-sheriffs-office-says/>) to apply for RRR. What didn't incentivise them with the original ordinance?
  - 2.2 "Encourage onsite propagation of plants..."
  - 2.3 Not negatively impact "Sensitive Receptors" by reducing the Enhanced Setbacks for Research, Testing, and Distribution in the original ordinance are not reduced by these amendments.
3. Makes the RRR approval subject to the prior clean up of the existing sites.
4. Humboldt County creates a database to track the cumulative effect of proposed estimated water usage and sources within a specific area (ex. Smaller than Willow Creek), as well has a procedure to track actual usage.
5. Explains how these changes will benefit the proposed Titlow Hill Subdivision Applicants and Zoning Changes and negatively affect all parcel owners and the environment.

Sincerely,  
Marisa Darpino  
Titlow Hill / Upper Redwood Creek  
District 5