

March 15, 2022

Letter from Concerned Neighbors regarding Nava Ranch, Inc. Special Permit Application (PLN-2021-17162) for Commercial Cannabis Expansion on APN 107-106-006

Dear Planning Commissioners,

We, Gary Haga and LaDonna Landergen-Haga of The Honeydew Creek Original Family Farms, are Honeydew residents adjacent to the proposed Nava Ranch project. We have lived here for decades, and our family has been on this property for more than one hundred years. We support cannabis farms and are cultivators ourselves who have gone through the difficult permitting process; however, we oppose this project because the applicant is an irresponsible operator with a project that is already out of compliance and should not be allowed to expand their operation nearly 5-fold.

The operation is not in compliance with the approved Special Permit. They currently cause noise and light pollution nightly, running a loud generator and never covering their greenhouses. We see lights every night from our living room and hear their generator from our back porch. If the existing project emits noise & light that impacts neighbors & wildlife – why should they be allowed to expand nearly 500%?

Additionally, information is inaccurate or missing from the application materials. There is absolutely zero evidence to support a legitimate source of power for this massive, mixed-light project, and it is impossible that one (1) full-time employee could operate a project of this size. Water use volumes are suspiciously low. No noise study was conducted to prevent noise impacts. Additionally, no Biological or Botanical reports were made available for the public to review prior to the hearing.

Hikers, hunters, and tourists recreating in the King Range Wilderness drive directly through the proposed project site on Smith-Etter Road to access trails and campsites. The existing greenhouses are visible from the road. Do you, Planning Commission, want visitors to encounter an environmentally irresponsible operation when they are coming to enjoy the natural beauty of the Mattole Valley?

Lastly, we received notice that the project would be heard on Thursday, March 24th, at 10 a.m., not Thursday, March 17th, at 6 p.m. It is possible that other concerned neighbors received the wrong notice and are unaware of this hearing due to this clerical error. For that reason alone, the project should be automatically continued.

Specifically, we oppose this project for the following reasons:

1. No Evidence of Sufficient Power to Support Expansion

- The proposed Nava Ranch, Inc. application would expand the approved 2,500 sq. ft. of indoor cultivation and the 9,100 sq. ft. of mixed-light cultivation to 2,500 sq. ft. of indoor and 43,560 sq. ft. of mixed-light cultivation, representing a nearly 5-fold increase of the existing project cultivation footprint. The proposed project also includes a new processing building.
- **There is no evidence in the Operations Plan or the Staff Report to demonstrate sufficient PG&E power to operate the project.**
 - o What is the existing PG&E service? There are no details in the project materials. If it is a 100-amp residential service, it would be wholly insufficient to serve the proposed

project. From the 1.0 application, there was only enough PG&E to serve the 2,500 sq. ft. of indoor.

- Are we supposed to believe the applicant is getting a PG&E upgrade? As we know, a PG&E upgrade in the Honeydew Valley is not a viable option, at least not for several years.
 - Are we then supposed to believe that the entire acre will run off of solar? If so, six (6) solar panels are completely insufficient to operate the acre of mixed-light cultivation, and no other areas for additional proposed solar are identified on the map.
 - There is no estimate of energy demand calculations in the application materials that would suggest the existing service could power the project.
- The applicants already power their generator day and night, out of compliance with the original approval. We hear it from our house all day, every day. We fear that without a legitimate power source, their generator use will continue or increase with expansion of the proposed project.

2. Light Pollution & Non-compliance with Approved Permit

- As an adjacent neighbor to the proposed project site, we see the lights gleaming from their mixed-light operation nightly. I can see it from my living room window; it lights up the entire valley almost every night.
- The approved project Staff Report for the Special Permit states that “the applicant would deploy light-proof covers/traps on the mixed-light hoop houses during the use of supplemental lighting to prevent spillover” (pg. 4). This has not been occurring. With their nightly light pollution, they impact nearby biological resources (e.g., Northern Spotted Owls) and disturb the peaceful atmosphere neighbors have come to enjoy.
- **Why should we allow an existing irresponsible applicant to dramatically expand their mixed-light cultivation activities when they already cannot cover or tarp their existing operation?** The proposal is not compatible with the neighborhood.

3. Noise Pollution & Lack of Evidence the Proposed Project would meet CCLUO Performance Standards

- How is this project being approved without a Noise Study? All projects have to submit a noise study at the time of application. Why is this applicant allowed to submit a noise study as a condition?
- We live less than 600 feet from the existing operation, and it is already extremely noisy. **They run their generator nearly 24/7, which is out of compliance with their existing permit.** We can hear the generator from our back porch. We used to have peaceful nights; now all we hear is this applicant’s generator. We are very worried that, despite the conditions and requirements, allowing this already-noisy operator to expand - without evidence or data that they will meet noise performance standards - is irresponsible.

4. Employee Count

- The project only proposes one (1) full-time and up to three (3) seasonal employees for an acre of mixed-light cultivation and a 2,500-sq. ft. indoor operation, with onsite trimming & 3 cycles per year? This is completely false and ridiculous; anyone knows it takes more than four people to operate a farm of this magnitude.
- We know they already use more employees than that. From our home, we witness at least a dozen people currently operating the existing farm on some days. **How would you increase the operation by 500% and reduce employees?**

5. Low Water Use & No Calculations to Support Harvest Volumes

- Total annual water usage is proposed to be 315,000 gallons, or **6.83 gallons/sq. ft./year**. This is an extremely low water use, and honestly seems impossible, especially for the Honeydew Valley Area and for a project with up to 5 cycles per year. **The applicant should provide additional information to demonstrate how they are going to be so water efficient.**
- The approved Special Permit had a projected water use of 135,000 gallons, or 11.6 gallons/sq. ft., which is typically more along the lines of cannabis farms in the area. How are the applicants proposing to increase the footprint while reducing water usage?
- What is the point of the additional 750,000-gallon pond if water use is only 315,000 gallons? Those numbers don't add up.
- Operations Plans typically include calculations to demonstrate the proposed rainwater catchment surfaces will capture sufficient water for the proposed project. With increasingly dry winters, how is it demonstrated that this project would function in a drought year? Calculations surrounding rain catchment should have been included in the Operations Plan.

6. No Biological or Botanical Studies for Public Review

- We were unable to locate the referenced Biological or Botanical studies in the Staff Report or on Accela. How can concerned neighbors, resource agencies, & the public properly analyze this project and make informed comments without having access to the Biological and Botanical Studies? This should have been made available prior to the hearing. **The project should not be approved without the ability for the public to review missing application materials.**
- The existing project already emits light and noise at night that likely impacts wildlife. How is it demonstrated – and how will it be enforced – that this operator will not impact wildlife with a greatly expanded project?
- This is a noisy, light-emitting project on the border of the Kings Range Wilderness, a haven for wildlife. As neighbors who have lived in the valley for years, we worry that the proposed project would greatly harm our beloved wildlife. An acre of mixed-light cultivation does not belong in the Kings Range Wilderness.

7. Neighborhood Incompatibility & Safety Concerns

- We have lived in the Honeydew Valley for decades. It is our home, and we treat it as such. This applicant does not care about the community; they have never once come to say hi.
- The entire Mattole Valley community is involved in neighborhood safety and have formed a Neighborhood Emergency Services Teams (NEST) to be able to respond to emergencies as a community. Unfortunately, the Nava Ranch applicants have not attempted to join or assist with this group. As you can see in the attachment, though they live on Landergren Road, they are not involved in community safety.
- Additionally, there was a small vegetation fire on the property last year that I, Gary, helped to fight. The operators were not onsite. We successfully extinguished the fire, and the applicants never once came and said thank you.
- **The applicants and this noisy, light-emitting project are incompatible with our neighborhood and our community's safety goals.**

8. General Site Cleanliness

- The operators leave tarps, netting, and other plastic along the road for their neighbors to pick up. Since the property changed owners to Nava Ranch, I have been picking up garbage from their operation constantly. **The operators do not keep a clean site and should not be allowed to produce even more unnecessary waste.**

9. King Range Wilderness Tourism

- Smith-Etter Road is used to access numerous campsites and trails in the King Range Wilderness, including the Kinsey and Spanish Ridge Trailheads, Miller Camp, and Bear Hollow Camp, among others. The existing greenhouses are clearly visible from Smith-Etter Road, as the road runs directly next to the project site. The expanded greenhouses would be even more visible.
- Hunters, tourists, recreationists, naturalists, hikers, and campers who visit the King Range Wilderness will be driving by this site. They should not have to drive next to a polluting, environmentally damaging site in the middle of this pristine wilderness, especially when they are there to enjoy the unique natural beauty that the Mattole Valley has to offer.

10. Public Lands Setback

- The approved project included a Special Permit to reduce the setback from Public Lands to 100 feet. The Staff Report claims that, as the operation is powered by PG&E and includes measures to ensure no light escape, the project is consistent with the terms of the previously approved Special Permit for the setback reduction. However, the existing project *does* emit light, and the generator is used constantly. Has Bureau of Land Management commented on this project?

11. Road Evaluation

- The self-certified 1.0 Road Evaluation does not seem sufficient to meet 2.0 standards. Where are the improvements regarding water quality? This year I witnessed silty water running off of their property, down the road toward Honeydew Creek. This should be addressed in the Road Evaluation, and in a Site Management Plan.
- We measured the road width of Landergren Road, and it only includes 12-15 feet of pavement. It is not 18 feet all the way through.

12. Enrollment in General Order

- The Staff Report includes a condition to enroll in the SWRCB General Order. All existing operations, including this one, should be enrolled in the General Order and should have an up-to-date Site Management Plan that describes how erosion and sediment control measures are implemented onsite.
- With no Site Management Plan, it seems erosion and sedimentation are not being controlled. I have witnessed silty brown water leaving their site. The project is adjacent to Honeydew Creek, a fish-bearing stream, and I am concerned about the water quality impacts this project poses. This is something that should be addressed before the operators are allowed to expand.

13. 30' Property Line Setbacks

- Though it is not depicted on the map, the applicant's well, water tanks, and other items are currently located within 30 feet of our property line. The existing project does not meet the property setbacks as designated by CalFIRE. We believe a property boundary survey should be conducted prior to approval to demonstrate compliance with property line setbacks.

We do not believe you should reward an operator who can't cover their greenhouses, leaves trash around, and runs their generator 24/7. We have deep roots in this community and a profound love for the Mattole Valley. Unfortunately, expansion of an already out-of-compliance, noisy, light-polluting, wasteful mixed-light cannabis operation with no legitimate power source located less than 100 feet from the pristine Kings Range Wilderness and Honeydew Creek would not further the peace and safety of residents and wildlife in the Mattole Valley. Please vote to deny this project.

Respectfully,

Gary Haga and LaDonna Landergren-Haga
The Honeydew Creek Original Family Farms

Photos



Lit up greenhouses at night – from our house (Photo from March 2022)



Lit up greenhouses at night – from our neighbor’s house (Photo from February 2022)



Example of trash laying around their site: plastic tarp, cultivation materials (Photo from March 2022)

2022 NEST Neighborhood Emergency Service Teams

This list of adults living full- or part-time in the Mattole Valley is for emergencies or major catastrophes. Phone numbers are for quick notification. Names/structures are to identify and help people who are injured or trapped. Neighbors check on neighbors. Neighborhood coordinators notify or account for adults in their NESTs. Parents account for children.

BEFORE AN EMERGENCY

- ◆ Pre-arrange a rendezvous with family members
- ◆ Have ready: first aid kit, food & water, flashlight, clothes & shoes, battery-operated radio

WHEN AN EMERGENCY OCCURS

- ◆ Turn off gas, and electricity, water if appropriate
- ◆ Locate family members
- ◆ Assess injury and damage
- ◆ Check with neighbors
- ◆ Community Liaison, Petrolia - Travis Howe, 629-3478
- ◆ Community Liaison, Honeydew - Claire Trower, 986-7688

**FIRES: call 911 first. Tell dispatcher which local fire company is closest.
Give good directions. Local fire companies will immediately be notified.**

Petrolia Volunteer Fire Department: call 911 first

Petrolia Fire Department (EMERGENCY): 629-3535
Petrolia Fire Department (non-emergency): 629-3558 Travis Howe, chief (629-3478)

Honeydew Volunteer Fire Company: call 911 first

Peter Marshall (499-2061) Claire Trower (land 986-7688, cell 499-4074)

Lower Mattole Valley NEST Coordinators:

Kathy Radke (629-3265) Gaby Cohen (629-3656) Amanda Malachesky (629-3614)
Sarah Balster Honeydew (834-4205)

Food and Shelter:

Mattole Valley Community Center (629-3565) Mattole Grange (629-3421)
Mattole Elementary School (629-3311, 629-3250), Honeydew School (629-3230) for children

MEDICAL: emergencies call 911

Josh Ennis MD (344-7500), Ellen Taylor PA (629-3500), Dick Scheinman MD (629-3365)
Marika Ennis MD (430-3651)

Other Numbers:

PG&E updates (1-800-743-5002)	HumCo Sheriff's Office (445-7251)
Roads (445-7421 or 1-800-427-7623)	HumCo Sheriff Search & Rescue (911)
Weather - NOAA (443-7062)	Mattole Valley Resource Center
CalFire Mattole Station (629-3344) seasonal	including emergency food (629-3348)
CalFire Weott Station (946-2215) all year	Mental Health - Monica Hubbard, MFT#111094
Burn Day (443-7665) (1-800-287-6329)	(206-409-5393 non-emergency appts)
Humboldt earthquake hot-line (826-6020)	HumCo Mental Health (1-888-849-5728)
Office of Emergency Services (268-2500)	Rape Crisis Line (445-2881)
Red Cross (443-4521)	Suicide life-line (1-800-273-8255)
Poison Control (1-800-222-1222)	Frontier local questions - Bill (786-0011)

Honeydew Post Office (629-3501)
Honeydew Store (629-3310)

Petrolia Post Office (629-3345)
Petrolia Store (629-3455)

Catalina, Maureen 499-4855	629-3699	Lyons, Linda & Ron	986-7258
Correll, Lee & Robin	986-7645	Morrison, Lisa	599-2107
Lee, Sissy	273-2549	Timber Guildler	498-1918
@*Teresa Davey	599-9727	*Claire Trower 499-4074	986-7688

Landergen Road E186 (coordinators needed)

Haga, Gary & LaDonna	629-3341		
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Meaux Road E175 (coordinators needed)

Hird, Ira 599-8497 & Mariah Gregori 599-8498	@*Marshall, Peter	499-2061
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Cathartes Peak E175 (coordinators needed)

Photo of Neighborhood Emergency Services Teams (NEST); Note the applicants on Landergen Road are absent

