

To: Humboldt County Planning Commission
For: February 4, 2021 Meeting
RE: Special Permit for 18,000 sq. ft. of new mixed light for Rising Goat Limited LLC
Record Number PLN-2020-16188

Planning Commissioners,

In response to concerns I previously submitted (and hope you have read,) regarding this permit application, staff revised the condition in Staff Report pg 13 item 3 "solar will be the main power source and generators will only be used as an emergency power source".

CCLUO 2.0 "55.4 .6.3.1 Energy Source: Electricity must be exclusively provided by a Renewable Energy Source, meeting the performance Standard for Energy Use." Exclusively means entirely, completely, totally, not mainly. This provision does not say totally renewable with generator back up. Once generator use is allowed, for back-up or twenty percent or whatever, it becomes an energy source not "exclusively provided by renewable energy".

The interpretation of, "meeting the Performance Standard for Energy Use" for "exclusively renewable" requirement is at issue. CCLUO 55.4.12.5 Performance Standard for Energy Use states; "All electricity sources utilized by Commercial Cannabis Cultivation Manufacturing, or Processing activities shall conform to one or more of the following standards:" with reference to "55.4.12.5.2 on-site renewable energy system with twenty percent net non-renewable energy use". Which is further clarified by, "55.4.6.5.6 Energy Source for Ancillary Propagation Facility or Mixed Light Cultivation", which limits generators to Pre-Existing cultivation sites only.. (2.0 Ordinance pg 19) This provision for Pre Existing is the exception that allows generator use along with renewable sources.

If a generator is allowed for "emergency back up", it will be used to supplement solar power, as anybody that lives off the grid with solar power knows. Generators are used to charge batteries. Emergency back-up quickly becomes the main source when not enough solar. The idea of growing three cycles of 18,000 sq. ft. mixed light from March to November at this location, with exclusively solar is not realistic and would need the aid of generators to supplement the solar input.

What would qualify as emergency back-up? What's the difference between emergency back-up and secondary supplemental? Unfortunately, the county has not exhibited the ability to monitor generator use to verify the actual use, considered as emergency back-up or twenty percent. And why require, electricity must be exclusively provided by a renewable energy source, if intended to include generator use?

I am requesting the Planning Commission to require this proposal be modified so that non-renewable generator use is not permitted, in order to comply with provision, "must be exclusively provided by a renewable energy source". No generators for new mixed light commercial cannabis. If not enough solar to supply energy needs, then downsize and/or growing outdoor are options.

Another major issue is the proposed use of well water with no forbearance requirement. Because of all the reasons stated in comments submitted by myself and neighbors, please require the Rising Goat operation to forbear during the forbearance period.

Respectfully,
Bonnie Blackberry
Long time off-grid neighbor