

McClenagan, Laura

Subject: Planning Commission September 16 File 11166

From: Jeff and Marisa St John <upperredwoodcreek@gmail.com>

Sent: Thursday, September 16, 2021 1:49 PM

To: Madrone, Steve <smadrone@co.humboldt.ca.us>; COB <COB@co.humboldt.ca.us>

Subject: Planning Commission September 16 File 11166

Dear Planning Commissioners,

Please take the following into consideration prior to approving or denying this cannabis project (a lot has changed in the four years since the project application):

1. APN 316-174-008 is within (but does not appear to be an applicant to the subdivision of) Titlow General Plan Amendment, Zone Reclassification, and Subdivision Certifications.

1.1. A Draft EIR is expected to be released "later this summer" (according to the Planning & Building Director). That information could influence your decision and I would hope that no decision about the cannabis project be made today.

1.2. Public Works did a Road Evaluation in December 2018 (more recent than the one in the cannabis project documentation). Perhaps there should be a comparison of the data to determine if additional road work needs to be done.

1.3. Last September some applicants to the subdivision agreed to develop a Road Maintenance Association and to my knowledge (letter from Planning & Building Director in January), no association was ever created. Highly probable that the Sabertooth Community would not create one either.

1.4. Road standards, according to the CalFire representative and Planning & Building Director in the summer of 2020 community meetings, needed to meet CalFire, not County requirements.

1.5. The Staff Report acknowledges that there are a "number of cultivation projects along Sabertooth Road..." Per CEQA, the Cumulative Impact ("Section 15355 of the State CEQA Guidelines defines a cumulative impact as the condition under which "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts...") should be assessed. In this situation, other grows, buildings, etc.

1.6. CalFire requires two access points - The entire length of Sabertooth Road would need to be brought up to standards and the employees given permissions to get through all of the locked gates.

2. Humboldt County is in a drought (July 20, 2021 Board of Supervisors declared a countywide local emergency and there was also one in 2014)

2.1. The amount of rain received in the Titlow Hill/Redwood Creek Watershed in the past five years has dropped from the thirties and almost sixties to about half of that.

2.2. The estimated cannabis water needs were done several years ago, as well as the stream diversion approval. The Operations Manual states "estimated irrigation water usage for cultivation during a typical year." We are in a drought.

2.3 This project should also take into consideration the amount of water used for the unpermitted residential, accessory, and infasture purposes and new structures/infrastructures too.

3. Botanical Survey -The CNPS Important Plant Areas Database lists at least seven locations of the Siskiyou checkbloom on this parcel. In addition to the survey of that plant, all important/sensitive/rare/etc. plants should be surveyed.

4. 10 Employees

4.1. The Staff Report only lists the mileage from Willow Creek. Employees from Arcata would travel almost 32 miles (one way). The County's General Plan, of which I do not have time to cite, intends to discourage extended commuter traffic. Only the agent is expected to reside, so the employees would be expected to commute. This project seems to ignore this.

4.2. Wildfires and their poor air quality have been increasing. This project appears to put people into peril in the timespan that the wildfires would occur and be most active.

5. Unpermitted Structures

5.1. According to the Staff Report (Page 37) states that an AOB was filed in 2013. The Staff Report was written in 2021 and it makes no mention of the status of the buildings (only that in 2017 permits would be requested after the cannabis permit is approved). Eight years of putting legal and illegal residents in peril along with any of their employees.

6. Fire Safety

6.1. Willow Creek and Blue Lake Volunteer Fire Departments do not appear to either be asked to comment or have responded for comment.

6.2. Blue Lake Volunteer Fire Department denied approval for the proposed Titlow Hill Subdivision due to that area's lack of fire/medical ability to respond.

Thank you for your consideration that this cannabis project review by the Planning Commission should be post-poned if not denied.

Sincerely,
Marisa Darpino
District 5