



May 12, 2022

Humboldt County Board of Supervisors
Attention: Clerk of the Board
825 Fifth Street Room 111
Eureka, CA 95501

RE: Blocksburg Family Farm, LLC Conditional Use Permits for 6.39 acres of Commercial Cannabis Propagation, Cultivation and processing (PLN_12265-CUP)

Dear Supervisors,

We, the Northcoast Environmental Center (NEC) and Citizens for a Sustainable Humboldt (CSH), appeal the Planning Commission decision to approve the Blocksburg Family Farm, LLC Conditional Use Permits for 6.39 acres of Commercial Cannabis Propagation, Cultivation and Processing (PLN_12265-CUP), granted on May 5, 2022 by the Humboldt County Planning Commission. We are filing this appeal within the requisite time period and have paid the appeal fee, and therefore request a hearing before the Board of Supervisors on the issues presented. After the hearing we ask for your reversal of the Planning Commission decision, and either deny the application, or else find that an Environmental Impact Report (EIR) is required for the project.

The Planning Commission adopted a Mitigated Negative Declaration for the project despite substantial evidence that we have presented (in the record & attached) supporting concerns

and objections that show the project may have significant environmental and social impacts.

In addition to the CEQA mandates that would compel your Board to require an EIR for a project of this size and scope, we ask that the Board of Supervisors also consider the potential detrimental effects on the health, safety and welfare of the residents of Humboldt County. Your Board has considerable discretion in its ability to deny the project or require an EIR.

We presented comments to the Planning Commission detailing our concerns about the potential negative impacts from this proposed project. Please see attached. To summarize:

- The Project's roads do not satisfy the minimum standards of the County's SRA Fire Safety Regulations. These regulations require that "road and street networks, whether public or private, shall provide for safe access for emergency wildland fire equipment and civilian evacuation concurrently and shall provide unobstructed traffic circulation during a wildfire emergency." It is inappropriate and dangerous to site an operation of this size— between cultivation and processing facilities, it exceeds 200,000 ft.², with up to 25 employees— in a remote wildland area with access roads that do not even currently meet a Category 2 standard.
- Because the initial phases (2-3 years) of the project will rely upon gasoline generators for all electricity needs (and generators can be a source of accidental wildfire ignition) it is even more imperative that the access road meet the county's fire safe standards. Additionally, the IS/MND indicates that employees will refuel the Project's generators with 5 gallon containers. This is an absurdly inappropriate, small-scale system applied to an industrial, large-scale project, without adequate safety measures.

- The asserted requirement for 25 employees, who will be traveling to the remote work site, is of an industrial scale, without adequate infrastructure for fire and medical safety.
- Humboldt County's Climate Action Plan points to transportation as a major source of greenhouse emissions. Permitting an industrial size operation in a remote area, requiring large numbers of employees to commute each day, is in direct contravention of this Plan. The mitigation via a "Vanpool" is unrealistic, for many reasons. How will this condition be monitored and enforced? And, personal safety is compromised in the event of an emergency, if evacuation is dependent upon gathering up and transporting many employees in one vehicle.
- New cultivation causes new impacts. According to the February 2022 Watershed Map prepared for this project, the majority of cannabis projects approved in the county are for new cultivation operations, not existing operations. For new and expanded operations the cost (impacts on County Roads, danger from wildfire, air pollution and irreversible impacts to the environment) of business ventures should be borne by the business, not forced upon the Humboldt County taxpayer and the natural environment.
- The allowance of groundwater for the cultivation of 2 acres of NEW cannabis before adequate water storage is developed may cause significant impacts to any hydrologically connected surface waters. The well tests prepared for this application DID NOT test the Project's well in the dry period, as required by Humboldt County regulations.
- This project, if allowed, would contribute to cumulative impacts to rare grassland prairie habitat. When the CMMLUO was adopted, the stated intent was to discourage cannabis cultivation in undeveloped remote areas and encourage

cultivation on agricultural land close to existing infrastructure.
This project IS NOT consistent with the intent of the CMMLUO.

This industrial size project is NEW cultivation and should not be allowed in a very remote rural location that is underserved by emergency personnel and public transportation. As described in the IS/MND, approval of the permit for this Project violates the County Ordinance, Fire Safe Regulations, and codified requirements for well testing during the dry season, to ensure adequate resources and mitigated impacts to surface waters.

Please support this Appeal, and deny the permit, or else require that a full EIR is required for the Project going forward.

Sincerely,

Robie Tenorio, Board Member
Citizens for a Sustainable Humboldt

