

The EIR process involved
162 individuals
8 organizations
6 local Agencies: Arcata, Trinidad, Blue Lake, Fortuna,
1 Regional Agency=RWB
3 state Agencies: F&W, CalTrans, Parks
Planning & Supervisors

Measure A contacted 10,000 people to get 7,000 valid signatures

Were the participants in the EIR listened to?

Department of Fish & Wildlife= 41 concerns

“The DEIR does not provide a complete analysis of cumulative impacts.”

“Avoidance measures in the DER do not adequately address indirect impacts to biological resources, such as habitat loss and fragmentation.

In a given Watershed the DEIR does not analyze the potential for significant impacts from cannabis cultivation water demand and streams.

The DEIR does not clearly define the criteria for individual cannabis cultivation project review under CEQA”

CDFW Pollutants, Habitat, Cumulative Impacts

“Prior to permitting additional cultivation, the county should prepare an analysis describing a) existing water uses b) potential for sediment and other pollutant discharge, and c) percentage of habitat fragmentation within a given HUC 12 or smaller Watershed. In addition the analysis should provide detail on the amount of cannabis cultivation the county promotes proposes to permit within each Watershed and what impacts the aloud cultivation would have on each of these elements.”

Recommendation 2

CDFW Analysis= Caps

“Prior to issuing permits for new cultivation, the county should define a cap based on an analysis of the impacts to each Watershed as described above”

Recommendation 2 FEIR

Planning deadline for Agency consultation= 10 days!

“County staff and/or applicants should consult with the department to ensure compliance with all fishing game code sections”

Measure A requires coordination and consultation

CDFW on **Enforcement**

“Based upon estimates of the number of active and projected cultivation sites in the county, and the number of site inspections that department staff can conduct in any given year under our own permitting authority, we estimate that Humboldt county may require a minimum of **30 personnel to adequately administer its proposed ordinance.**”

S1-21 FEIR

County never coordinated data collection or studies of watershed carrying capacities

“The County lacks the technical experience to collect this extent of data and determine what is the appropriate aquatic carrying capacity.” (FEIR 2-24)

“The County would be willing to participate in joint watershed evaluation studies with these agencies.” 2-24 FEIR

County has ignored annual adaptive management public hearings for over 5 years

To compensate for no cumulative impacts analysis, the County promised an adaptive management approach:

“---the Board of Supervisors agrees to conduct an **annual review** of the limits and prescribed distribution of permitting and acreage allowances; and “...the Board may choose to establish **new caps on acreage and permits as well as change their distribution within watersheds.**”

(Res 18-43).

No such meeting has happened and the County never solicited Agencies' assistance in a cumulative analysis.

Humboldt Bay Municipal Water District

“The county has already determined many potential environmental impacts that would impact HBMWD: hydrology and water quality, public services, biological resources, and utilities and service systems.” DEIR

Humboldt Community Services District

“The EIR should provide information on all aquifers within Humboldt County and provide the rationale and scientific basis for establishing a formula that can be used to calculate the maximum amount of water that can be taken from each aquifer for cannabis cultivation without interfering with existing or future public water supplies.”

Regional Water Board

“Shared use roads are among the most significant sources of chronic sediment discharges to surface waters across populated rural landscapes.”

Regional Water Board

“The RWB has received **significant complaints from neighbors** concerned with **ground water drawdown** associated with increased ground water extraction for large scale cannabis cultivation. Impacts to groundwater levels need to be identified and mitigated. This will require a **robust monitoring** and reporting program similar to that of surface water, timely identification of potential impacts, and **adaptive management** to improve the strategy.”

Environmental Protection Information Center

“Our North Coast salmon are barely
holding on...”

DEIR

Friends of Eel River

“Unannounced inspections for all commercial permit holders”

“Meaningful cap on overall number of permits. FOER has proposed a limit of 1500 permits for the first few years, pending completion of full environmental review.”

“10,000 square foot megagrows and even larger operations should be very limited in number, subject to exacting review, and restricted to sites most appropriate for large commercial operations.”

Friends of Eel River

“The County has not done the analysis necessary to show how much cannabis cultivation its lands and waters can support. It also hasn’t addressed how Humboldt’s legal weed industry will relate to the larger state market and economy. What does an ecologically and economically sustainable weed industry look like for Humboldt County? Frankly, people don’t want to know because the outlook isn’t pretty.”

DEIR

Friends of Eel River

“Please hone your watershed analysis to reflect the appropriate scale. The proposal offered by the Planning Department to allocate thousands of additional permits across 12 planning basins reflects the same lack of attention to stream diversions and sediment impacts that undermines the Environmental Impact Report’s analysis.”

DEIR

Neighbors' Comments on DEIR

”Violent crime and increased dangerous drug use related to the marijuana industry

- Overuse of rural roads, including high speed, and reckless driving;

- Traffic on unpaved roads is estimated to contribute as much as 60% of Humboldt County’s harmful airborne particulates (PM10)

- Semis towing two 30 foot trailers laden with growing materials are now a common sight on the Mattole Road.

- The increased damage to our roads is evident. These trucks also come around blind curves taking up both lanes.

Neighbors Speak to Deaf Ears, DEIR.

Disturbance from environmental and “white” noise pollution, e.g., traffic, generators, stray dogs, poaching, odor, light pollution etc.;

- Decreased private property values as a result of adjacent cannabis businesses;
- Long-term environmental impacts of the marijuana industry on Humboldt County’s wildlands and associated fisheries and wildlife resources

Neighbors Speak, DEIR

“Rural communities’ traditional quality of life that has been impacted by the loss of open spaces provided by large ranches and lands that have been subdivided, developed, and subsequently intensely cultivated for marijuana production”

◦ “Property values are artificially inflated and traditional agricultural entrepreneurs cannot afford to purchase land, or they are motivated to sell open land at inflated market prices”

Neighbors Continue to Speak, DEIR

“The **lack of notification** and consideration of neighbors and landowners with shared roadways, and shared maintenance responsibility needs to be addressed.

There is an increasing **negative impact to the scenic vistas** and visual quality in the outlying rural areas with the day time glare from green houses with water bladders covering the meadows, and ever increasing number of green houses glowing in the night.”

“...in their greed they have erected white grow-houses visible for miles.”

Neighbors, DEIR

“In this new “boom” economy nothing matters but money.”

“Unsightly fences have proliferated, impede deer”

“Pollution from runoff of heavy fertilizers, from diesel-powered generators, and from excessive vehicles involved in the industry; trash piles from the all-too-common tons of plastic which are rarely recycled”

Federal Scheduling of Cannabis

The Growers' Alliance explains the anticipated boom

In 2021, Natalynne DeLapp, of the Humboldt County Growers Alliance, indicated why they and many in the County oppose lowering the cap on permits:

“The light at the end of the tunnel is interstate and international commerce.” “We’re still probably two to three years away from that, so the big question is how the county can support farmers...and how we can use the time we have...so that we hit the ground running when those new markets open up.” (TS, 8/23/21).

Neighbors Complain About Green Rush, DEIR

“Increase in human population as Green Rushers hurry to take advantage of this grey area in legality and enforcement, and between state legality and national unlawfulness.”

“The additional people bring with them more motor vehicles, which make the roads in rural Humboldt County more dangerous, and also cause unforeseen damage to both County- and privately-maintained roads, a result particularly of huge trailer trucks loaded with bagged soil and other pot-growing supplies.

...many other threats to quiet, peaceful enjoyment of the country life, particularly irresponsible dog ownership and a plethora of feral pit bulls throughout Southern Humboldt”

A Grower Neighbor, DEIR

“Currently there is an over production in cannabis which has made the price plummet in recent years. **Opening the application process to more cultivations would put small rural farmer like us at a severe disadvantage.”**

Final EIR passed with “Overriding Concerns”

In 2018, the FEIR was voted in by Supervisors with Overriding Concerns, because of significant impacts from 2.0 that cannot be mitigated

No Carrying Capacity Data=More Grows?

County never analyzed the carrying capacity of watersheds, considering the massive cumulative impacts from logging, overfishing, climate change, etc.

Consequently, without Measure A, we could have 2000 additional permits, with **970 more in the Eel, 277 in the Mad, 148 in lower Klamath, 311 in the Van Duzen....**

Boom=Impacts

Like other booms we have endured, the impacts will outlast the benefits.

Boom vs Sustainable

Measure A guides us into a more sustainable future, fulfilling the **Growers' Alliance's vision**: “Humboldt’s cannabis businesses cannot compete in a commodity market.” “What makes Humboldt special is our terroir, our story, and our history — that cannot be replicated elsewhere.” “It’s quality over quantity.”

Coho and Other Salmonids on the Brink

Coho depend on coastal drainages, like Freshwater, Elk, Eel, Mattole, Klamath, Mad, Smith, Salmon, Redwood

Coho salmon stocks in small coastal streams north of San Francisco Bay were at a moderate risk of extinction, near the threshold of being qualified for listing under ESA.

“Status of Coho Salmon in California Report to the National Marine Fisheries Service” By: Larry R. Brown and Peter B. Moyle 1 July 1991

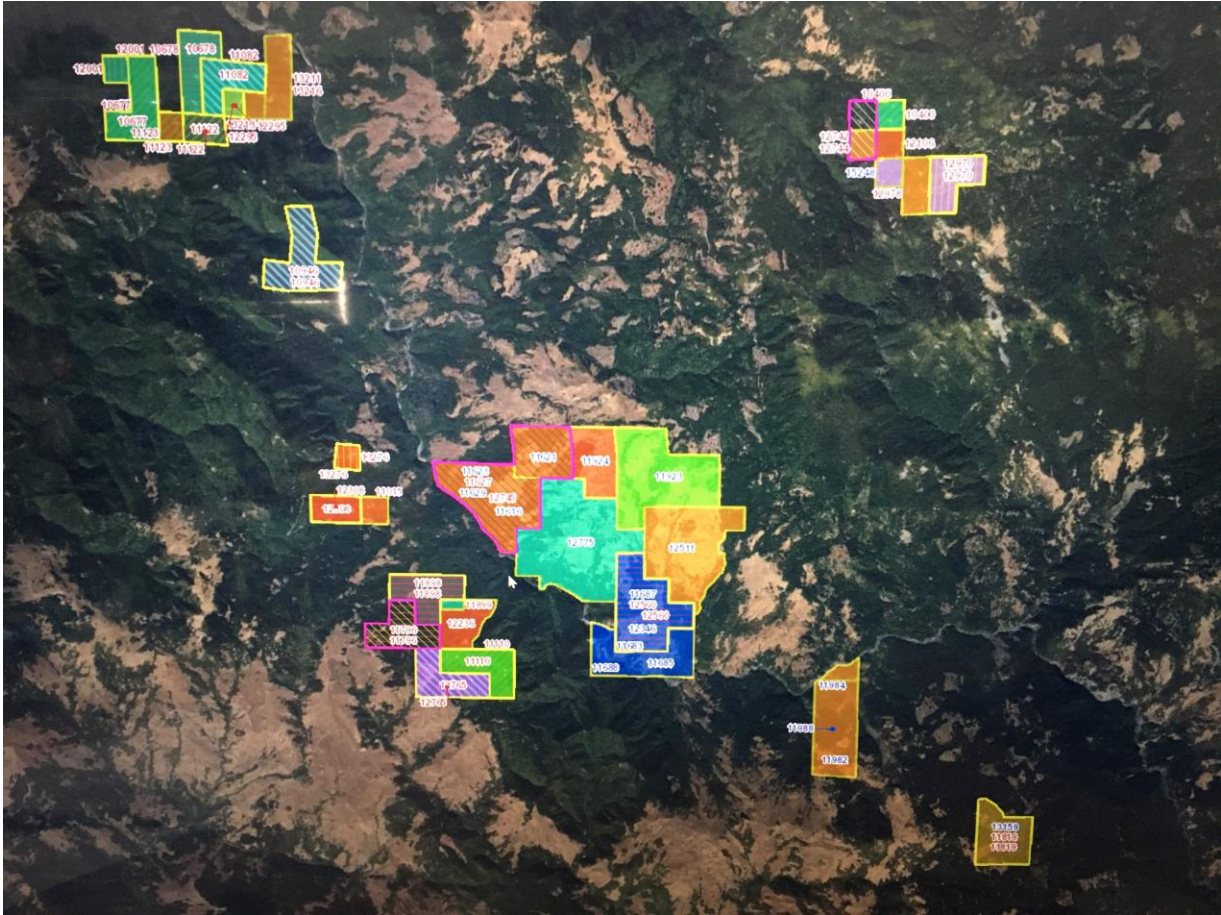
Mattole Headwaters Fragmented Habitat



Disruptive Industrial Cultivation

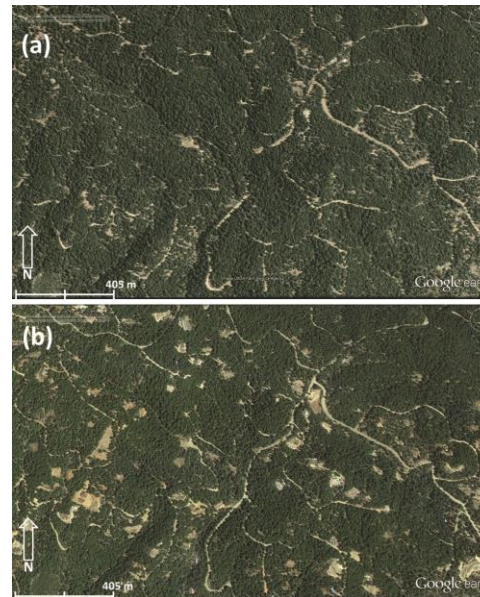


Cumulative Grows in Vicinity of Golden Eagle Nest Site, Maple Creek



Land Clearing, Habitat Conversion, Roads

Figure 1. Land clearing, habitat conversion, and road building associated with marijuana cultivation in the Trinity ...



Grow Impinging Cowan Creek, Golden Eagle Foraging Territory



Industrial 2 acre Grow Maple Creek, 6m gal ponds



Planning and Supervisors OK It Anyway

“This area has not yet been obliterated with hoop houses and everything else that goes with it.”^[L]_[SEP]“We don’t have to let happen what has happened to a beautiful place like Honeydew, Alderpoint, Blocksburg.” Alan Bongio, Chair PC

“I've heard it over and over and over about the industrial size of this in such a remote area and the detrimental effects it's going to have on the whole basin. And I can't say that strongly enough.” Ronnie Pellegrini, PC