

Kaycee Hathaway

From: SOARS Save Our Ag & Rural Spaces <saveouragandruralspaces@gmail.com>
Sent: Wednesday, February 18, 2015 4:41 PM
To: Kaycee Hathaway
Subject: Grow Bros. SEPA
Attachments: Grow Bros. comment for SEPA.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Ms. Hathaway,

Please place this attachment of my letter objecting to the DNS on the Grow Bros. marijuana production and processing facility on Rader Road.

Julie Ufkes
Save Our Ag & Rural Spaces

June 23, 2014

Kaycee K. Hathaway
Kittitas County Community Development Services –Planner
1 411 N. Ruby, Suite 2
Ellensburg, WA 98926
kaycee.hathaway@co.kittitas.wa.us

Re: SEPA application for Grow Bros. on 2990 Rader Road, Ellensburg, WA

Dear Ms. Hathaway,

As I read through the SEPA application for Grow Bros., I was struck by some things that seemed illogical and make me question the completeness of the application and veracity of the answers on the SEPA checklist.

- 1) There is mention of a 6,000 square foot processing building in Phase II and yet;
 - a) There are no MSDS sheets for any chemicals to be used during processing.
 - b) The only MSDS sheets given are for chemicals used during production.
 - c) They claim all the chemicals used are not volatile, but they have not disclosed what type of processing or what type of chemicals are to be used in that processing.
 - d) They deny they will need septic (sewer) for such a large indoor facility that should require at the minimum safety showers in case of burns to employees via cannabis extractions.
 - e) There is no operating plan for the processing facility.
 - f) Operating plans should be required as part of this application and made available to the public.
 - g) WAC 314-55-104, Marijuana processor license extraction requirements state, "Professional closed loop systems, other equipment used, the extraction operation, and facilities must be approved for their use by the local fire code official and meet any required fire, safety, and building code requirements specified in..."
- 2) They claimed there will only be 4-5 employees commuting to work a day and yet:
 - a) NMF, another Tier 3 producer on Naneum Road, claimed they would employ 6 full time and an additional 8 seasonal workers for a single Tier 3 with processing license.
 - b) There are 19 parking spaces on phase I alone and another 19 on phase II. Who is going to be using all these spaces?
 - c) They are clearly setting themselves up to have a second Tier 3 grow operation as well as a processing facility.
 - d) How many employees and visitors should they have to plan for as far as a water system goes? If the first phase has 5 employees, as many could be expected for a second tier 3. The processing plant could have even more.
 - e) Once they reach a certain critical mass somewhere over 20ish, they need a class A water system.
- 3) There is mention of five 50' x 120' buildings for fully indoor hydroponic growing and yet:
 - a) There are no bathrooms planned.
 - b) They say the employees will use porta potties.

- c) Processing at the very least involves hand washing and some minimal plumbing should be required for that.
- 4) Indoor grows have potential impacts on the environment.
 - a) Waste water discharge is one of several concerns.
 - i) Wastewater discharges may include fertilizers, pesticides, sanitizers, and cleaning chemicals
 - ii) In hydroponic grows, a “flush” may occasionally be performed.
 - (1) This flush water has chemicals that may have unknown impacts on the ground water whether sent through a septic system or just soaked into the ground.
 - (2) Perhaps, if this is allowed, they need to truck their flush water out instead of letting it leach into the ground?
 - (3) But who is going to monitor and enforce this?
 - b) CO2 use can include combustible sources like propane or natural gas burners as well as CO2 tanks.
 - i) CO2 is used during light phase to increase plant growth and flowering.
 - ii) CO2 is raised from 400ppm to 1200-1800ppm.
 - iii) CO2 concentrations higher than 0.5% can be detrimental to health according to this government report,
<http://www.blm.gov/style/medialib/blm/wy/information/NEPA/cfodocs/howell.Par.2800.File.dat/25apxC.pdf>.
 - c) High-Intensity Discharge and other Mercury- containing Lamps are used.



- 5) Noise Issues –
 - a) Grow Bros. claims the operation of their facility will be “unusually quiet.”
 - b) I don’t think they are familiar with the sounds associated with cattle grazing and grass growing if they think they are bringing a quiet industry to the neighborhood.
 - c) The ventilators for the hoop houses at Life Gardens are very noisy.

- i) In this video you can hear how loud the ventilators at Life Gardens are.
http://www.clipsyndicate.com/video/play/5365880/life_gardens_begins_harvest
- ii) Keep in mind that Greta's hair is not moving. That roar is not from the wind. It is all from the ventilators.
- iii) Indoor grows need an air circulation rate 60 times that of a home.
- iv) Therefore, phase II will create an even noisier situation.

6) Odor Issues

- a) Grow Bros. claims there will be no offsite emissions or odor and that no mitigation is needed.
- b) A man in Spokane testified that his wife was experiencing asthma like symptoms she had never had before the large scale marijuana operation moved in next door.
- c) Former Fish and Game Warden, Rich Wilkins, has testified in his comments on the McDonald CUP that the plant smells of skunk at all stages of growth and in particular at the harvesting of it.
- d) According to reports from people who worked out in Upper Badger Pocket Road last fall, a strong odor was noticeable when downwind from Life Gardens.
- e) Life Gardens proudly tweeted about the smell of their plants last November.



7) Public Services – Fire and Police

- a) Grow Bros. claims no additional need for services than any other business.
- b) This is a high risk business by way of the value of the product and the means of processing.
 - i) Combustible materials can be used in processing and can be quite dangerous.
 - ii) The Sheriff was called to Life Gardens six times last fall.
 - iii) SOARS has presented much evidence that this is an industry that has attracted crime.
 - (1) The value of the product is now three times higher than what it was pre-legalization of rmj.

- (2) Prices from Early February 2015 show Life Gardens being the most expensive brand at \$25/gram, which is roughly \$700/ounce. (\$25/gm x 28.3 gm/oz. = \$707.50/oz.)
- (3) There are reports from Indiana that black market prices are around \$800/ounce for the high quality stuff “from out west.”
- (4) This is still a largely cash based system and some nefarious people have even gone so far as to torture legal mmj shop owners to get information as to where the cash is stored.
- (5) In addition, producers may store millions of dollars worth of crop.
- (6) Mike Graham of NMF on Naneum, just a short distance away from Grow Bros. site, was reported as saying he was holding on to a lot of his crop from last fall until he can get some higher prices.
- (7) Storing the valuable crop increases the incentive for thieves to attempt to disable security and abscond with the cash and weed.
- (8) Located so far in the country, even if alarms were triggered, the response time for law enforcement would be inadequate.
- (9) The Denver PD sent me an email saying that crime against mj businesses rose 32% in the first 6 months of 2014 compared to the first 6 months of 2013.

The screenshot shows a web interface for a cannabis menu. At the top, it says "Cannabis Central Menu" and "powered by Leafly". Below this is a search bar with the text "Type here to search menu" and a "Clear" button. There are also dropdown menus for "Name" and "All". A "Show filters" button is located on the right side of the menu section.

The main content area is titled "Flowers" and lists several cannabis strains. Each entry includes the strain name, a brief description, a star rating, and the price per unit. The strains listed are:

Strain Name	Description	Rating	Price	Unit
Ace of Spades	70/30 Indica - 13.8% THC - 2g package for \$20 - From Geck...	4.1 of 5		
Bay 11	Pure Sativa - 24.1% THC - From LifeGardens.	4.4 of 5	\$20	gram
Black Cherry OG	Indica - 29.7% THC - From Buddy Boy Farms.		\$25	gram
Blue Dream	70/30 Sativa. 1g packages 22.7% THC for \$20 or 2 for ...	4.2 of 5	\$20	gram
Bubble Gum	60/40 Indica - 13.4% THC - From LifeGardens.	3.9 of 5	\$15	gram
Chernobyl	Roll Your Own Trim - 80/20 Sativa - 12.1% THC - From...	4.2 of 5	\$55	quarter
Critical Mass	HIGH CANNABINOID STRAIN - 5.5% THC 9.4% CBD - F...	4 of 5	\$15	gram
Critical Plus	Indica Hybrid - 21.5% THC - From Buddy Boy Farms.	3.9 of 5	\$18	gram
Dr. Who	60/40 Indica - 21.1% THC - From Natural Mystic Farms.	4.3 of 5	\$18	gram

From: "Dulacki, Mary J. - MOS" <Mary.Dulacki@denvergov.org>
 Subject: MJ Business Crime
 Date: Tue, 14 Oct 2014 10:02:48 -0600
 To: "lufkes@fairpoint.net" <lufkes@fairpoint.net>

Good Morning:

The Denver Police Department website posts crime statistics at denvergov.org/police which can be accessed using the drop-down menu under the tab "Crime Information".

For crime related to marijuana, I can provide you with the following statistical information:

Tickets issued for Possession or Public Display/ Consumption through July, 2014:

-Possession 233 (down 68% from 2013)
 -Public Display/Consumption 639 (up 245% from 2013)

Burglary is the most prevalent of all marijuana-related crime – 112 out of 187 Through June, 2014, marijuana-related burglaries were up 32% when compared to the first 6 months of 2013.

Charges for Driving Under the Influence of Drugs where Marijuana is the suspected drug have increased

Through 9/5/2013-54 DUID charges (23 for marijuana)

Through 9/5/2014-78 DUID charges (39 for marijuana)

<http://www.denvergov.org/Portals/584/images/New311Lockup/EmailIcon.jpg>

Mary Dulacki | Records Coordinator
 Department of Safety | City and County of Denver
 720.913.6262 Phone
mary.dulacki@denvergov.org

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10/06/14
 15:50

Kittitas County Sheriffs Office
 LAW Incident Table

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CALLS FOR SERVICE REPORT:

When reported	Incident address	Incident na	Disp	Responsible off
21:49:36 09/16/2014	16845 UPPER BADGER POCK	ALARM-LAW	CH	THOMAS, DAVID
23:44:52 09/10/2014	16845 UPPER BADGER POCK	ALARM-LAW	CH	THOMAS, DAVID
20:32:36 09/06/2014	16845 UPPER BADGER POCK	VEHICLE CON	CHW	BERG, CHARLES
20:08:06 09/06/2014	16845 UPPER BADGER POCK	ALARM-LAW	CHW	BERG, CHARLES
19:32:12 08/26/2014	16845 UPPER BADGER POCK	ALARM-LAW	CHV	FLETCHER, PETER

10/31/14
 14:36

Kittitas County Sheriffs Office
 LAW Incident Table

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CALLS FOR SERVICE REPORT:

When reported	Incident address	Incident na	Disp	Responsible off
22:19:31 10/15/2014	16845 UPPER BADGER POCK	ALARM-LAW	CH	KIVI, DAN
21:49:36 09/16/2014	16845 UPPER BADGER POCK	ALARM-LAW	CH	THOMAS, DAVID

This proposed project does indeed have significant environmental impacts. The determination of nonsignificance is incorrect.

Sincerely,

Julie Ufkes

Save Our Ag & Rural Spaces

707 N. Pearl St.

Ellensburg, WA 98926