

# KINGS COUNTY

Community Development Agency  
1400 W. Lacey Blvd., Bld. 6  
Hanford, CA 93230

## CEQA ADDENDUM TO THE MITIGATED NEGATIVE DECLARATION

**Project Title:** Conditional Use Permit No. 23-05 for the Sandridge Beef Harvesting Plant Project

**Applicant:** Kings County  
Community Development Agency  
Contact: Chuck Kinney, Deputy Director - Planning  
1400 W. Lacey Blvd., Bld. 6  
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### Project Background

The Sandridge Beef Harvesting Plant Project initially secured approval under Conditional Use Permit (CUP) 21-06 from the Kings County Planning Commission in July 2022. However, CUP 21-06 lapsed one year after its approval due to the lack of building permit issuance or the commencement of construction activities. In the wake of CUP 21-06's expiration, a reapplication process has been initiated for a new Conditional Use Permit, CUP 23-05. CUP 23-05 mirrors the original project's scope and no changes to the project are proposed.

### Summary of this Document

As the responsible agency under the California Environmental Quality Act (CEQA), Kings County is committed to ensuring that all projects within its jurisdiction undergo a rigorous and transparent environmental review process. This addendum to the Initial Study/Mitigated Negative Declaration (IS/MND) for the project previously approved under Conditional Use Permit (CUP) 21-06, now re-applied for as CUP 23-05, serves to address and document additional considerations and responses to comments received from stakeholders, including concerns raised by People's Farm.

The purpose of this addendum is not prompted by substantive changes to the project itself or the discovery of new significant environmental information that would typically necessitate a reevaluation under CEQA guidelines. Instead, this document is prepared as a proactive measure to further ensure the comprehensive consideration of environmental impacts, particularly in light of these recent communications. This Addendum is meant to aid in the

decision-making process and is not intended to recommend approval or denial of the proposed revisions to the project.

This addendum finds that the Project, as proposed and currently reassessed, would not result in new significant impacts or substantially increase the severity of impacts previously discussed in the original IS/MND. Therefore, an addendum is sufficient to address the concerns raised by People's Farm regarding the proposed Project and subsequent or supplemental environmental documentation is not required.

### **California Environmental Quality Act**

This addendum assesses the proposed Sandridge Beef Harvesting Plant project in light of comments received by People's Farm (Attachment A). Under Sections 15162 and 15164, an addendum to an adopted negative declaration shall be prepared only if:

- No new significant impacts will result from the project or from new mitigation measures
- No substantial increase in the severity of environmental impact would occur
- No new feasible alternatives or mitigation measures that would reduce impacts previously found not to be feasible have been found to be feasible

Under Section 15162, the Lead Agency must prepare a Subsequent EIR or MND if there are any new significant environmental impacts associated with the revised project. Because reassessment of the project has not identified any new significant environmental impacts, the revised project does not require a Subsequent EIR or MND.

### **Environmental Considerations**

People's Farm has raised concerns regarding the potential environmental impacts of the project, specifically focusing on the issues of dust, flies, and their potential effects on agricultural operations. These concerns stem from the proximity of the proposed project to People's Farm and the nature of its agricultural activities. As part of this CEQA Addendum, these concerns will be thoroughly evaluated to assess their validity and potential impact. Through this analysis, the addendum aims to address People's Farm's concerns in a manner that is both thorough and aligned with CEQA's requirements for environmental review.

### **Analysis of Potential Environmental Effects**

The original IS/MND identified mitigation measures to reduce and eliminate any potential environmental impacts of the project to a less than significant level. All of the mitigation measures approved within the original IS/MND would also apply to the proposed project. Because no new significant impacts have been identified, no new mitigation measures are necessary.

## **1. Aesthetics**

The original IS/MND found that the project would have a less than significant impact on scenic vistas, scenic resources, or the visual character of the site and its surroundings. The potential for the project to generate light or glare was found to be less than significant.

Upon reassessment of the project in consideration with the concerns raised by People's Farm, no new impacts to aesthetic resources have been identified and no mitigation is required.

## **2. Agriculture**

The original IS/MND found that the project would have no impacts or less than significant impacts on forest lands, timberlands, existing agricultural zoning or Williamson Act Contracts, or conversion of farmland to non-agricultural use. The original IS/MND found that impacts related to the conversion of Farmland of Statewide Importance to non agricultural use could be reduced to less than significant levels through implementation of mitigation measures. Impacts to agricultural resources have been reassessed in consideration of the concerns raised by People's Farm regarding dust, flies, and their consequential effects on crop health and yield.

A wind pattern analysis was conducted to evaluate the potential impacts of the proposed beef plant project on People's Farm, with a specific focus on concerns regarding dust and flies. This wind pattern analysis is provided in Attachment B.

The analysis of prevailing wind patterns and speeds in relation to the proposed project and People's Farm indicates that the environmental impact, particularly concerning dust and flies, is expected to be negligible. The predominant wind directions do not align with the path between the project site and People's Farm, and the average wind speeds are likely insufficient to carry potential contaminants over the distance involved. These findings, supported by meteorological data and the natural barriers of wind direction and speed, provide a substantial basis for concluding that the concerns raised by People's Farm regarding the project are not substantiated by the current environmental conditions. As such, reanalysis of the project has not identified any new significant impacts or increase in the severity of previously identified impacts. No additional mitigation is required.

## **3. Air Quality**

The original MND found all potential impacts to Air Quality to be less than significant. Impacts related to dust emissions have been reassessed in consideration of the concerns raised by People's Farm regarding the effects of dust on crop yield and health.

As discussed under the Agricultural resources section, A wind pattern analysis was conducted to evaluate the potential impacts of the proposed beef plant project on People's Farm. This wind pattern analysis is provide in Attachment B.

The analysis of prevailing wind patterns and speeds in relation to the proposed project and People's Farm indicates that the environmental impact, particularly concerning dust and flies, is expected to be negligible. The predominant wind directions do not align with the path between the project site and People's Farm, and the average wind speeds are likely insufficient to carry potential contaminants over the distance involved. Therefore, reanalysis of the project has not identified any new significant impacts or increase in the severity of previously identified impacts. No additional mitigation is required.

#### 4. **Biological Resources**

The Biological Report that was prepared for the original IS/MND found that the project would have no impacts or less than significant impacts to riparian habitat or other sensitive community, wetlands, wildlife corridors, locally protected biological resources, or habitat conservation planning areas. The report found that impacts to protected species could be reduced to less than significant levels through the use of mitigation measures.

Upon reassessment of the project in consideration with the concerns raised by People's Farm, no new impacts to biological resources have been identified and no additional mitigation is required.

#### 5. **Cultural Resources**

The Cultural Resources Assessment prepared for the original IS/MND found that impacts to cultural resources could be reduced to less than significant levels through the use of mitigation measures.

Upon reassessment of the project in consideration with the concerns raised by People's Farm, no new impacts to cultural resources have been identified and no additional mitigation is required.

#### 6. **Energy**

The original IS/MND found that the project would not have impacts associated with the conflict or obstruction of a state or local plan for renewable energy or energy efficiency, and that impacts associated with the wasteful, inefficient, or unnecessary consumption of energy resources would be less than significant.

Upon reassessment of the project in consideration with the concerns raised by People's Farm, no new energy-related impacts have been identified and no mitigation is required.

## **7. Geology and Soils**

The original IS/MND found that the project would have no impact or less than significant impacts regarding exposure of people or structures to earthquakes, seismic ground shaking, seismic-related ground failure, landslides, soil erosion, or loss of topsoil. The project is not located on unstable soils or expansive soils, and there would be no impacts regarding the soils capability to support the use of septic tanks or other wastewater disposal system. It was found that the project would have a less than significant impact on soil erosion and loss of top soil. The original IS/MND found that impacts related to unknown paleontological resources can be reduced to less than significant levels through the use of mitigation measures.

Upon reassessment of the project in consideration with the concerns raised by People's Farm, no new geological- or soils-related impacts have been identified and no new mitigation is required.

## **8. Greenhouse Gas Emissions**

The original IS/MND found that the project would have a less than significant impact on greenhouse gas emissions and would not conflict with an applicable plan, policy or regulation to reduce greenhouse gas emissions.

Upon reassessment of the project in consideration with the concerns raised by People's Farm, no new impacts related to greenhouse gas emissions have been identified and no mitigation is required.

## **9. Hazards and Hazardous Materials**

The original IS/MND found that the project would have no impacts associated with the handling of hazardous materials within one-quarter mile of an existing or proposed school, noise associated with proximity to an airport, implementation of an adopted emergency response plan, or exposure to injury or injury or death from wildland fires. The original IS/MND found that impacts involving the transport, use, disposal, or release of hazardous materials can be reduced to less than significant levels through the use of mitigation measures.

The project would not require the use of any hazardous materials that have not already been identified in the original IS/MND. Upon reassessment of the project in

consideration with the concerns raised by People's Farm, no new impacts related to hazards and hazardous materials have been identified and no new mitigation is required.

## **10. Hydrology and Water Quality**

The original IS/MND found that the project would have no impacts related to flooding, tsunami, or seiche zones, and the project would not conflict with a water quality control plan or sustainable groundwater management plan. The original IS/MND identified less than significant impacts involving decreased groundwater supplies, erosion, surface runoff pollution, and flood flows. The original IS/MND determined that impacts to water quality standards or stormwater drainage systems can be reduced to less than significant levels through the use of mitigation measures.

Upon reassessment of the project in consideration with the concerns raised by People's Farm, no new impacts related to hydrology and water quality have been identified and no mitigation is required.

## **11. Land Use and Planning**

The original IS/MND found that the project would have no impacts related to land use and planning. The project does not conflict with zoning or general plan land use designations and would not physically divide an established community. Upon reassessment of the project in consideration of the concerns raised by People's Farm, no new impacts related to land use or planning have been identified and no mitigation is required.

## **12. Mineral Resources**

The original IS/MND found that the project would have no impacts related to mineral resources. Upon reassessment of the project in consideration of the concerns raised by People's Farm, no new impacts related to greenhouse gas emissions have been identified and no mitigation is required.

## **13. Noise**

The original IS/MND found that the project would have no impacts or less than significant impacts related to noise. Upon reassessment of the project in consideration of the concerns raised by People's Farm, no new impacts related to noise have been identified and no mitigation is required.

**14. Population and Housing**

The original IS/MND found that the project would have no impact on population and housing. Upon reassessment of the project in consideration of the concerns raised by People's Farm, no new impacts related to population or housing have been identified and no mitigation is required.

**15. Public Services**

The original IS/MND found that the project would have no impact or a less than significant impact on public services. Upon reassessment of the project in consideration of the concerns raised by People's Farm, no new impacts related to public services have been identified and no mitigation is required.

**16. Recreation**

The original IS/MND found that the project would have no impact on parks or recreation because it would not include recreational facilities or increase the demand on existing residential facilities. Upon reassessment of the project in consideration of the concerns raised by People's Farm, no new impacts related to public services have been identified and no mitigation is required.

**17. Transportation**

The original IS/MND found that the project would have no impact or a less than significant impact on transportation, including those involving CEQA guidelines Section 15064.3, subdivision (b). Upon reassessment of the project in consideration of the concerns raised by People's Farm, no new impacts related to transportation have been identified and no mitigation is required.

**18. Tribal Cultural Resources**

The original IS/MND found impacts to tribal cultural resources would be reduced to less than significant levels through implementation of mitigation measures. Upon reassessment of the project in consideration of the concerns raised by People's Farm, no new impacts related to tribal cultural resources have been identified and no new mitigation is required.

**19. Utilities and Service Systems**

The original IS/MND found that the project would have no impact or less than significant impact on utilities and service systems. Upon reassessment of the project in

consideration of the concerns raised by People's Farm, no new impacts related to utilities and service systems have been identified and no new mitigation is required.

## **20. Wildfire**

The original IS/MND found that the project would have no impact or less than significant impacts related to wildlife. Upon reassessment of the project in consideration of the concerns raised by People's Farm, no new impacts related to wildfire have been identified and no new mitigation is required.

## **21. Mandatory Findings of Significance**

The original IS/MND found that cumulative impacts and adverse impacts to human beings would be less than significant, and impacts to the environment and historic resources to be less than significant with mitigation. The potential impacts of the project with regard to biological resources, cultural resources, and human beings have not changed upon reassessment of the project in consideration of the concerns raised by People's Farm. The Sandridge Beef Plant project would not result in new significant impacts or increase the severity of impacts discussed in the original IS/MND. No new mitigation measures are required.

## **Conclusions**

The reassessment conducted for the CEQA addendum, considering the concerns raised by People's Farm, evaluated potential environmental impacts from the Sandridge Beef Harvesting Plant Project. The analysis reaffirmed the findings of the original IS/MND, identifying no new significant impacts nor necessitating further mitigation measures. The concerns related to dust, flies, and their potential effects on People's Farm were extensively examined through a wind pattern analysis, which underscored the negligible environmental impact expected from the project. Consequently, the addendum concludes that the project, as proposed, does not introduce new significant environmental impacts or exacerbate previously identified concerns, thereby not changing the conclusions of the original IS/MND.

## **Attachments**

- People's Farm Comment Letters and 4Creeks Responses
- Wind Pattern Analysis



# **ATTACHMENT A**

People's Farm Comment Letters  
and 4Creeks Responses



February 2, 2024

**VIA EMAIL**

Kings County Community Development Agency  
Planning Division  
1400 W. Lacey Blvd.  
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Email: chanda.jackson@co.kings.ca.us

RE: Sandridge Cattle Project CUP No. 23-05

Dear Kings County Planning Commission,

The purpose of this letter is to respond to 4-Creeks, Inc.'s ("4-Creeks") response (the "4-Creeks Response") to People's Farming, LLC's ("People's") objection letter dated December 4, 2023 (the "People's Objection Letter"). As a reminder, People's owns and operates the fully-licensed and compliant cannabis agricultural operation located at 1805 S. 19th Avenue, in the City of Lemoore (the "People's Farm"), which will be profoundly negatively impacted if Sandridge Partners, L.P. ("Sandridge Partners") is permitted to move forward with its beef processing plant (hereinafter, the "Sandridge Project") without further research, investigation and careful consideration including ensuring that CEQA guidelines are followed by Sandridge Partners and the Kings County Planning Commission (the "Commission").

**CEQA NON-COMPLIANCE.** There should be no doubt that a hard stop is required here as substantial changes have occurred with respect to the circumstances under which the Sandridge Project is proposed which will require major revisions of the previous negative declaration due to the involvement of new significant environmental effects (or a substantial increase in the severity of the previously identified significant effects) since Sandridge Partners submitted its original CUP Application ("CUP No. 21-06") on December 1, 2021, and the underlying environmental study that led to the submission of the original Mitigated Negative Declaration (the "2021 MND") was adopted in July of 2022. Clearly, the studies and reviews underlying the 2021 MND were begun sometime in early 2021 in order for the 2021 MND to be attached to the original December 2021 CUP Application.

Moreover, new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence, when the 2021 MND was adopted, shows that the project will have one or more significant effects not discussed in the previous negative declaration.

The Commission's Staff Report dated November 6, 2023 ("Current Staff Report"), contains the exact same description of "Land Use Surrounding Site" as the Staff Report for the now expired CUP No. 21-06 (the "Expired Staff Report") despite the fact that there have been significant changes in the use of surrounding land, including the People's Farm. The staff in its Current Staff Report acknowledges that CUP No. 21-06 has expired but says that pursuant to CEQA Guidelines Section 15162(a) "no significant changes to the originally approved project have



been proposed by the applicant so, as a result, no further environmental review was required and it was recommended that the [2021 MND] be adopted.”

However, whether there are changes to the proposed project is only **one** of many considerations under Section 15162(a) the staff must take into account when determining whether further environmental review is required, including, but not limited to, whether:

- (i) Substantial changes have occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of the previously identified significant effects (*See* Section 15162(a)(2)): or
- (ii) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time of the previous negative declaration was adopted, shows that the project will have one or more significant effects not discussed in the previous negative declaration. (*See* Section 15162(a)(3)(A)).

Moreover, it is **mandatory** (not discretionary) that the Commission prepare an EIR or negative declaration if changes to circumstances occur or new information becomes available after the adoption of the of a negative declaration. (*See* Section 15162(b)).

Finally, a subsequent EIR or subsequent negative declaration **shall** be given the same notice and public review. (*See* Section 15162(d)).

The substantially changed circumstances and new information of substantial importance that was not known and could not have been known when the 2021 MND was prepared or at the time the 2021 MND was adopted to include the fact that People’s Farm first full farm year wasn’t until 2022. In 2022 and 2023, People’s Farm has spent millions of dollars on developing its infrastructure to support its ongoing agricultural operations and its future manufacturing plant in the City of Lemoore. 2022 is also when People’s Farm ramped up its 5-10 year, \$30-70M development project involving approximately 600 acres entitled for cannabis growing and manufacturing. The People’s development project includes a plan for a large-scale extraction plant. There has been no review or study of the impact that the proposed Sandridge Project will have on traffic<sup>1</sup>, water (ground water), air quality, chemical trespassing, pest control, and other factors that would certainly have a significant impact on People’s Farm’s current and proposed operations. Because the People’s Farm did not experience its first full farming season until 2022 and because People’s Farm was not contacted, consulted or even considered when the 2021 MND was prepared and finalized, it is mandatory that the Commission require an EIR or, at a minimum, a new negative declaration.

Given the foregoing, several of the Commission’s findings in its Current Staff Report, including those numbered 2 (compliance with CEQA) and 3 (no significant negative effects)

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<sup>1</sup> Especially given the fact that the Sandridge Project includes a retail store.



aren't valid given mandatory provisions of CEQA Guidelines Section 15162 cited above. The Commission has a duty and obligation to ensure that a new MND environmental review is completed before the CUP is referred to the County Board of Supervisors. At a minimum, the Commission is required to engage in a thorough review of the changed circumstances and new information with reference to its obligations under Section 15162 and to make additional findings consistent with Sections 15162(a)(2) and 15162(a)(3)(A). Without following the appropriate process, the Commission would be merely "rubber stamping" Sandridge Partners' renewed CUP application. A result that would deny People's Farm its due process and certainly lead to expensive and time-consuming litigation.

**OTHER OBJECTIONS.** People's previously *conditionally* retracted its opposition to the Sandridge Project after meeting and conferring with owner John Vidovich. However, due to other factors including, but not limited to persistent, now proven, chemical trespassing the People's Farm experienced from Mr. Vidovich's nearby agricultural operation, People's has no choice but to renew its objections detailed in the January 2022 letter to the City of Lemoore and the People's Objection Letter. The viability of the People's Farm and its continued operation relies on a reasoned and well thought-out decision by the Commission, which we would argue requires that the Sandridge Project be relocated.

The 4-Creeks Response to the People's Objection Letter further demonstrates the lack of understanding for the People's operation and how it will be negatively impacted by the Sandridge Project.

**4-CREEKS' RESPONSE—THEME #1: ALWAYS COMPLIANT WITH RULES AND REGULATIONS.** One of overall themes of 4-Creeks' Response is that People's has nothing to worry about because Sandridge Partners will run a compliant, responsible beef processing plant. Unfortunately, Sandridge Partners have not been an entirely responsible neighbor in the past.

**Chemical Trespass.** Unfortunately, the rigorous review of chemical application plans does not remove the risk of chemical trespassing if those plans are not followed. Mr. Vidovich owns a cornfield that lies at the northeast corner of the People's Farm. On August 12, 2023, his pesticide applicator applied Spiromesifen (Oberon) to Mr. Vidovich's cornfield, to battle mites and whiteflies. This miticide was sprayed on a particularly windy day. Due to a lack of consideration for the wind speed and direction, the Spiromesifen drifted onto the People's Farm. In an effort to be good neighbors, People's refrained from immediately filing a complaint with the Ag Commissioner's office and tried to determine the feasibility of remediation to remove the unwanted miticide. People's operates under and complies with the strictest of growing standards, without pesticides. Without remediation, the existence of Spiromesifen threatened to destroy the value of the People's crop. People's followed the Ag Commissioner's guidelines and documented the pesticide drift internally in case its remediation efforts failed. This documentation process included field sampling, pesticide testing, and videotaping of the entire process. Subsequent pesticide test results confirmed the presence of Spiromesifen.

The cannabis industry must adhere to stringent regulations. All substances used for pest control and plant nourishment at the People's Farm must be organic or better. Product that fails



pesticide and contaminant testing are unable to be sold. Regrettably, People's suffered a similar instance of chemical trespassing in 2022, which was only discovered at harvest. Since People's had no way of proving who sprayed the pesticides, it implemented weekly tissue culture tests on its field to identify potential chemical trespassers. That's how People's discovered the 2023 trespass and linked it directly to Mr. Vidovich's agricultural operation. Due to Mr. Vidovich's chemical trespassing, People's suffered a 20-50% yield loss on its product.

**4-CREEKS' RESPONSE—THEME #2: LITTLE TO NO RISK TO PEOPLE'S CROPS DUE TO FLIES AND DUST.** Another of overall themes of 4-Creeks' Response is that the beef processing plant won't result in an influx of flies as the cattle will spend little time outdoors. Unfortunately, common sense leads to the conclusion that regardless of how long the cattle remain outdoors, there will be a noticeable and dangerous influx in the number of flies, resulting in an unacceptable risk of pollen transfer.

**Increase in Flies and Dust.** Even if each individual cow doesn't spend much time outside, there will certainly be the constant movement of cattle outside on a daily basis. The constant presence of cattle in the expansive 16,000 square foot cattle loading area is an undeniable reality. There will be an inevitable and significant increase in flies, dust, and manure regardless of Sandridge Partners' efforts. The consequences pose a substantial threat to the People's Farm operations, potentially resulting in financial losses in the millions of dollars as an increase in flies will cause cross-pollination potentially destroying the People's Farm crop. Dust and dirt will also degrade the plant and invite pests such as bugs, mites, and spiders. To ensure the financial viability of its crops and ultimately the People's business, it is imperative that a robust abatement plan be discussed between the parties, researched and developed in a mutually cooperative environment. At a minimum, the plan should strategically address and minimize the migration of dust, pests, and flies.

**Degradation and Destruction of Crop.** People's has spent 15 years and millions of dollars in plant genetic research and development. People's has developed proprietary genetics that add significant value to its business. The People's genetic research and development partner, Kayagene, LLC ("Kayagene"), based out of Hollister, California, provided the letter attached hereto detailing the dangers of cross-pollination and appropriate buffer zones. Kayagene is an industry leader in both traditional agriculture and, more specifically, cannabis seed genetic research and development. Female cannabis plants are the sole producers of flower and oil. The flies from the Sandridge project will likely cross-pollinate the female cannabis plants and convert them to male cannabis plants, which renders the plant essentially useless. Cross-pollination will significantly lower the yield and potency of the People's crop. Kayagene is in the process of updating their letter, which People's should have at the time of the Commission's meeting on February 5, 2024.

**City of Lemoore Support.** The City of Lemoore supports People's Farm and has indicated that they would send their City Manager, Nathan Olson, to speak in support at the Commission meeting.

**CONCLUSION.** The Commission does not have the discretion to ignore the CEQA requirements and given the substantial changed circumstances and new information of



substantial importance that was not known and could not have been known when the 2021 MND was prepared or at the time the 2021 MND was adopted, People's believes that the Commission is compelled to require an EIR or, at a minimum, require a new, updated negative declaration. Not doing so would ignore CEQA and deny People's Farm its due process.

If the Commission refuses to follow CEQA and finds that an EIR or new negative declaration is required, then in the alternative, a balancing of equities compels the conclusion that there would be no harm to the Sandridge Project and Sandridge Partners if the Commission delays the approval in order to allow the parties additional time to meet and confer regarding the Sandridge Project and the impact it would have on the People's Farm.

Allowing the Sandridge Project without careful and measured consideration and only after collection of accurate and complete information could be catastrophic for the People's business and millions of dollars in losses. It is imperative that the Commission require the implementation of effective remediation measures to protect the integrity of the People's operations.

In light of these critical considerations and if the Commission chooses to ignore its obligations under CEQA, People's respectfully requests an extension of 180 days to engage in meaningful dialogue with Sandridge Partners and to thoroughly assess the potential impact of the Sandridge Project on the People's Farm in order to safeguard our respective investments. We also request that the Commission allow each party to further brief their positions prior to making a final decision.

We thank the County for this opportunity to comment.

Sincerely,

DocuSigned by:

*Bernard Steimann*

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Bernard Steimann, Managing Member

4-Creeks, Inc. Response to  
People's Farming, LLC  
Comment Letter – Dated  
February 2, 2024



**February 5, 2024**

Kings County Planning Commission  
Kings County Government Center  
1400 W. Lacey Boulevard,  
Hanford, CA 93230

**RE: Response to People's Farming, LLC Comment Letter Dated February 2, 2024**

Dear Kings County Planning Commission,

We are writing in response to the letter from People's Farming, LLC, dated February 2<sup>nd</sup> 2024, which was provided in response to our response letter dated December 4<sup>th</sup>, 2023. This comment letter prepared by People's Farming, LLC is included as Attachment A.

***Comment 1: The comment letter notes that, even though there have not been significant changes to the project itself, new environmental review would be required if:***

- (i) Substantial changes have occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of the previously identified significant effects (See Section 15162(a)(2)): or***
- (ii) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time of the previous negative declaration was adopted, shows that the project will have one or more significant effects not discussed in the previous negative declaration. (See Section 15162(a)(3)(A)).***

We acknowledge the criteria outlined would necessitate a new environmental review under CEQA. It's essential to understand that substantial changes or new information warranting a review must directly relate to significant environmental impacts not previously addressed. Our project remains consistent with initial evaluations.

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***Comment #2: The commenter argues that People’s Farm’s first full year of operation and its expansion after the Initial Study/Mitigated Negative Declaration (IS/MND) was adopted represent significant changes to the project’s context. They contend this development introduces important new information not previously known or knowable with reasonable diligence at the time the 2021 MND was approved.***

The expansion of People's Farming operations and their first full farming year, while noteworthy, do not constitute a substantial change in the project's context nor present new, significant environmental information. This development, while a progression for People's Farm, does not introduce fundamentally new or significantly impactful information that would necessitate a reassessment under CEQA guidelines. The People's Farm provided a comment letter in January 2022 (prior to the adoption of the original IS/MND) identifying their concerns with the project. While this letter was retracted, the recent submissions from People's Farm, dated December 4th, 2023, and February 2nd, 2024, do not present novel concerns or impacts beyond those previously evaluated. Consequently, there is a lack of substantial evidence to suggest that the operational changes at People's Farm have materially shifted the environmental context or impact of our project since the approval of the original IS/MND.

***Comment #3: The commenter claims that the Sandridge Project’s potential impacts on traffic, groundwater, air quality, chemical trespassing, pest control, and other environmental factors have not been thoroughly evaluated or studied.***

Traffic impacts associated with the proposed project were evaluated in the previously adopted IS/MND. The analysis found that the project would generate a maximum of 89 trips per day during construction and 107 trips per day during operations. While the project would result in the addition of new trips on these road segments, this increase will not result in traffic volumes exceeding Level of Service Thresholds. The analysis found that impacts to traffic would be less than significant.

The project's potential to impact groundwater resources was analyzed in the previously adopted IS/MND. During operations, the project is estimated to require approximately 50,000 gallons of water per day. The project site is zoned for agricultural use. As such, it was appropriate to compare water demand from the project to water demand if the site were used for typical crop cultivation. The analysis found that the project would use approximately 33% less water than if the site were used for cultivated agriculture.

Air quality emissions from construction and operation of the proposed were estimated using CalEEMod and were found to be far below the emissions thresholds established by the San

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info@4-creeks.com



Joaquin Valley Air Pollution Control District. With regard to chemical trespassing, the proposed project does not include application of fertilizers or pesticides as no cultivated agriculture is proposed. The Sandridge Beef Plant Project does not have the potential to create impacts related to chemical trespassing as described in the People's Farm comment letter.

Operational measures, such as the management of the cattle loading area and the processing of by-products, are in place to significantly minimize the risk of fly infestation, adhering to strict food processing standards.

***Comment #4: The commenter argues that that Sandridge Partners have not always been compliant with rules and regulations, particularly with regard to chemical application plans and chemical trespassing.***

As stated previously, the proposed project does not include application of fertilizers or pesticides as no cultivated agriculture is proposed. The Sandridge Beef Plant Project does not have the potential to create impacts related to chemical trespassing as described in the People's Farm comment letter. Regardless of the validity of the commentator's claims regarding instances of chemical trespassing from other Sandridge-owned properties, the farming activities associated with these chemical trespassing claims are not part of the Sandridge Beef Plant project and are not relevant in consideration of the proposed project.

***Comment #5: The commentor expresses concern that the beef processing plant's operation will inevitably lead to an increase in flies, dust, and manure, posing a significant risk to People's Farm due to potential cross-pollination and pest attraction. Despite the cattle's limited outdoor time, the constant movement and presence in a 16,000 SF holding area is expected to impact People's crops negatively.***

A beef processing plant operated in compliance with FDA regulations would not be considered a primary source of fly infestations, especially within the context of the area. As previously stated, the project would include daily removal of blood, dead animals, and offal, as well as indoor processing and storage of products, significantly minimizes the potential for fly infestation.

It should also be noted that The Sandridge Beef Plant project site is zoned for agricultural use and is within the Dairy Element Compatibility Zone. The presence of live cattle in an enclosed outdoor holding area is a normal agricultural operation that is typical of the area. Given People's Farm's decision to establish their cannabis operation in an area well-known for dairy and feedlot activities, concerns regarding flies and dust from the modest 16,000 SF cattle

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holding area seem disproportionate. The vicinity is characterized by much larger agricultural operations that inherently deal with similar challenges on a greater scale. This, along with the operational measures outlined previously, greatly reduces the probability of the project having a discernible impact on fly presence in the vicinity.

Sincerely,

A handwritten signature in black ink that reads "Molly Baumeister".

Molly Baumeister, AICP  
Planner/Project Manager  
4-Creeks, Inc.

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# **ATTACHMENT A**

**People's Farming, LLC Comment Letter Dated February 2, 2024  
RE: Sandridge Cattle Project CUP No. 23-05**



February 2, 2024

**VIA EMAIL**

Kings County Community Development Agency  
Planning Division  
1400 W. Lacey Blvd.  
Hanford, CA  
Email: chanda.jackson@co.kings.ca.us

RE: Sandridge Cattle Project CUP No. 23-05

Dear Kings County Planning Commission,

The purpose of this letter is to respond to 4-Creeks, Inc.'s ("4-Creeks") response (the "4-Creeks Response") to People's Farming, LLC's ("People's") objection letter dated December 4, 2023 (the "People's Objection Letter"). As a reminder, People's owns and operates the fully-licensed and compliant cannabis agricultural operation located at 1805 S. 19th Avenue, in the City of Lemoore (the "People's Farm"), which will be profoundly negatively impacted if Sandridge Partners, L.P. ("Sandridge Partners") is permitted to move forward with its beef processing plant (hereinafter, the "Sandridge Project") without further research, investigation and careful consideration including ensuring that CEQA guidelines are followed by Sandridge Partners and the Kings County Planning Commission (the "Commission").

**CEQA NON-COMPLIANCE.** There should be no doubt that a hard stop is required here as substantial changes have occurred with respect to the circumstances under which the Sandridge Project is proposed which will require major revisions of the previous negative declaration due to the involvement of new significant environmental effects (or a substantial increase in the severity of the previously identified significant effects) since Sandridge Partners submitted its original CUP Application ("CUP No. 21-06") on December 1, 2021, and the underlying environmental study that led to the submission of the original Mitigated Negative Declaration (the "2021 MND") was adopted in July of 2022. Clearly, the studies and reviews underlying the 2021 MND were begun sometime in early 2021 in order for the 2021 MND to be attached to the original December 2021 CUP Application.

Moreover, new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence, when the 2021 MND was adopted, shows that the project will have one or more significant effects not discussed in the previous negative declaration.

The Commission's Staff Report dated November 6, 2023 ("Current Staff Report"), contains the exact same description of "Land Use Surrounding Site" as the Staff Report for the now expired CUP No. 21-06 (the "Expired Staff Report") despite the fact that there have been significant changes in the use of surrounding land, including the People's Farm. The staff in its Current Staff Report acknowledges that CUP No. 21-06 has expired but says that pursuant to CEQA Guidelines Section 15162(a) "no significant changes to the originally approved project have



been proposed by the applicant so, as a result, no further environmental review was required and it was recommended that the [2021 MND] be adopted.”

However, whether there are changes to the proposed project is only **one** of many considerations under Section 15162(a) the staff must take into account when determining whether further environmental review is required, including, but not limited to, whether:

- (i) Substantial changes have occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of the previously identified significant effects (*See* Section 15162(a)(2)): or
- (ii) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time of the previous negative declaration was adopted, shows that the project will have one or more significant effects not discussed in the previous negative declaration. (*See* Section 15162(a)(3)(A)).

Moreover, it is **mandatory** (not discretionary) that the Commission prepare an EIR or negative declaration if changes to circumstances occur or new information becomes available after the adoption of the of a negative declaration. (*See* Section 15162(b)).

Finally, a subsequent EIR or subsequent negative declaration **shall** be given the same notice and public review. (*See* Section 15162(d)).

The substantially changed circumstances and new information of substantial importance that was not known and could not have been known when the 2021 MND was prepared or at the time the 2021 MND was adopted to include the fact that People’s Farm first full farm year wasn’t until 2022. In 2022 and 2023, People’s Farm has spent millions of dollars on developing its infrastructure to support its ongoing agricultural operations and its future manufacturing plant in the City of Lemoore. 2022 is also when People’s Farm ramped up its 5-10 year, \$30-70M development project involving approximately 600 acres entitled for cannabis growing and manufacturing. The People’s development project includes a plan for a large-scale extraction plant. There has been no review or study of the impact that the proposed Sandridge Project will have on traffic<sup>1</sup>, water (ground water), air quality, chemical trespassing, pest control, and other factors that would certainly have a significant impact on People’s Farm’s current and proposed operations. Because the People’s Farm did not experience its first full farming season until 2022 and because People’s Farm was not contacted, consulted or even considered when the 2021 MND was prepared and finalized, it is mandatory that the Commission require an EIR or, at a minimum, a new negative declaration.

Given the foregoing, several of the Commission’s findings in its Current Staff Report, including those numbered 2 (compliance with CEQA) and 3 (no significant negative effects)

<sup>1</sup> Especially given the fact that the Sandridge Project includes a retail store.

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aren't valid given mandatory provisions of CEQA Guidelines Section 15162 cited above. The Commission has a duty and obligation to ensure that a new MND environmental review is completed before the CUP is referred to the County Board of Supervisors. At a minimum, the Commission is required to engage in a thorough review of the changed circumstances and new information with reference to its obligations under Section 15162 and to make additional findings consistent with Sections 15162(a)(2) and 15162(a)(3)(A). Without following the appropriate process, the Commission would be merely "rubber stamping" Sandridge Partners' renewed CUP application. A result that would deny People's Farm its due process and certainly lead to expensive and time-consuming litigation.

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**OTHER OBJECTIONS.** People's previously *conditionally* retracted its opposition to the Sandridge Project after meeting and conferring with owner John Vidovich. However, due to other factors including, but not limited to persistent, now proven, chemical trespassing the People's Farm experienced from Mr. Vidovich's nearby agricultural operation, People's has no choice but to renew its objections detailed in the January 2022 letter to the City of Lemoore and the People's Objection Letter. The viability of the People's Farm and its continued operation relies on a reasoned and well thought-out decision by the Commission, which we would argue requires that the Sandridge Project be relocated.

4

The 4-Creeks Response to the People's Objection Letter further demonstrates the lack of understanding for the People's operation and how it will be negatively impacted by the Sandridge Project.

**4-CREEKS' RESPONSE—THEME #1: ALWAYS COMPLIANT WITH RULES AND REGULATIONS.** One of overall themes of 4-Creeks' Response is that People's has nothing to worry about because Sandridge Partners will run a compliant, responsible beef processing plant. Unfortunately, Sandridge Partners have not been an entirely responsible neighbor in the past.

**Chemical Trespass.** Unfortunately, the rigorous review of chemical application plans does not remove the risk of chemical trespassing if those plans are not followed. Mr. Vidovich owns a cornfield that lies at the northeast corner of the People's Farm. On August 12, 2023, his pesticide applicator applied Spiromesifen (Oberon) to Mr. Vidovich's cornfield, to battle mites and whiteflies. This miticide was sprayed on a particularly windy day. Due to a lack of consideration for the wind speed and direction, the Spiromesifen drifted onto the People's Farm. In an effort to be good neighbors, People's refrained from immediately filing a complaint with the Ag Commissioner's office and tried to determine the feasibility of remediation to remove the unwanted miticide. People's operates under and complies with the strictest of growing standards, without pesticides. Without remediation, the existence of Spiromesifen threatened to destroy the value of the People's crop. People's followed the Ag Commissioner's guidelines and documented the pesticide drift internally in case its remediation efforts failed. This documentation process included field sampling, pesticide testing, and videotaping of the entire process. Subsequent pesticide test results confirmed the presence of Spiromesifen.

The cannabis industry must adhere to stringent regulations. All substances used for pest control and plant nourishment at the People's Farm must be organic or better. Product that fails



pesticide and contaminant testing are unable to be sold. Regrettably, People's suffered a similar instance of chemical trespassing in 2022, which was only discovered at harvest. Since People's had no way of proving who sprayed the pesticides, it implemented weekly tissue culture tests on its field to identify potential chemical trespassers. That's how People's discovered the 2023 trespass and linked it directly to Mr. Vidovich's agricultural operation. Due to Mr. Vidovich's chemical trespassing, People's suffered a 20-50% yield loss on its product.

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**4-CREEKS' RESPONSE—THEME #2: LITTLE TO NO RISK TO PEOPLE'S CROPS DUE TO FLIES AND DUST.** Another of overall themes of 4-Creeks' Response is that the beef processing plant won't result in an influx of flies as the cattle will spend little time outdoors. Unfortunately, common sense leads to the conclusion that regardless of how long the cattle remain outdoors, there will be a noticeable and dangerous influx in the number of flies, resulting in an unacceptable risk of pollen transfer.

**Increase in Flies and Dust.** Even if each individual cow doesn't spend much time outside, there will certainly be the constant movement of cattle outside on a daily basis. The constant presence of cattle in the expansive 16,000 square foot cattle loading area is an undeniable reality. There will be an inevitable and significant increase in flies, dust, and manure regardless of Sandridge Partners' efforts. The consequences pose a substantial threat to the People's Farm operations, potentially resulting in financial losses in the millions of dollars as an increase in flies will cause cross-pollination potentially destroying the People's Farm crop. Dust and dirt will also degrade the plant and invite pests such as bugs, mites, and spiders. To ensure the financial viability of its crops and ultimately the People's business, it is imperative that a robust abatement plan be discussed between the parties, researched and developed in a mutually cooperative environment. At a minimum, the plan should strategically address and minimize the migration of dust, pests, and flies.

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**Degradation and Destruction of Crop.** People's has spent 15 years and millions of dollars in plant genetic research and development. People's has developed proprietary genetics that add significant value to its business. The People's genetic research and development partner, Kayagene, LLC ("Kayagene"), based out of Hollister, California, provided the letter attached hereto detailing the dangers of cross-pollination and appropriate buffer zones. Kayagene is an industry leader in both traditional agriculture and, more specifically, cannabis seed genetic research and development. Female cannabis plants are the sole producers of flower and oil. The flies from the Sandridge project will likely cross-pollinate the female cannabis plants and convert them to male cannabis plants, which renders the plant essentially useless. Cross-pollination will significantly lower the yield and potency of the People's crop. Kayagene is in the process of updating their letter, which People's should have at the time of the Commission's meeting on February 5, 2024.

**City of Lemoore Support.** The City of Lemoore supports People's Farm and has indicated that they would send their City Manager, Nathan Olson, to speak in support at the Commission meeting.

**CONCLUSION.** The Commission does not have the discretion to ignore the CEQA requirements and given the substantial changed circumstances and new information of





substantial importance that was not known and could not have been known when the 2021 MND was prepared or at the time the 2021 MND was adopted, People's believes that the Commission is compelled to require an EIR or, at a minimum, require a new, updated negative declaration. Not doing so would ignore CEQA and deny People's Farm its due process.

If the Commission refuses to follow CEQA and finds that an EIR or new negative declaration is required, then in the alternative, a balancing of equities compels the conclusion that there would be no harm to the Sandridge Project and Sandridge Partners if the Commission delays the approval in order to allow the parties additional time to meet and confer regarding the Sandridge Project and the impact it would have on the People's Farm.

Allowing the Sandridge Project without careful and measured consideration and only after collection of accurate and complete information could be catastrophic for the People's business and millions of dollars in losses. It is imperative that the Commission require the implementation of effective remediation measures to protect the integrity of the People's operations.

In light of these critical considerations and if the Commission chooses to ignore its obligations under CEQA, People's respectfully requests an extension of 180 days to engage in meaningful dialogue with Sandridge Partners and to thoroughly assess the potential impact of the Sandridge Project on the People's Farm in order to safeguard our respective investments. We also request that the Commission allow each party to further brief their positions prior to making a final decision.

We thank the County for this opportunity to comment.

Sincerely,

DocuSigned by:  
  
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Bernard Steimann, Managing Member

# **ATTACHMENT B**

**People's Farming, LLC Comment Letter Dated December 2023  
RE: Sandridge Cattle Project CUP No. 23-05**



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December 4, 2023

**VIA EMAIL**

Kings County Community Development Agency – Planning Division  
1400 W. Lacey Blvd.  
Hanford, CA  
Email: chanda.jackson@co.kings.ca.us

RE: Sandridge Cattle Project CUP No. 23-05

Dear Kings County Planning Commission,

People's Farming, LLC ("People's"), which owns and operates the fully licensed and compliant cannabis agricultural operation located at 1805 S. 19th Avenue, Lemoore, CA 93245 (the "People's Farm"), hereby renews its objections to the beef processing plant portion of the Sandridge Project (the "Beef Processing Plant").

People's Farm had previously *conditionally* retracted its opposition to the Beef Processing Plant after meeting and conferring with owner John Vidovich. Due to (i) what we see are proposed changes to the Beef Processing Plant portion of the Sandridge Project and (ii) persistent chemical trespassing we've experienced from Mr. Vidovich's nearby operation, we are renewing the objections detailed in our January 2022 letter to the City of Lemoore.

Our February 2022 retraction of the objections raised in our January 2022 was conditional because, for instance, but not by way of limitation, we were told that the Beef Processing Plant would be no larger than 30,000 sq. ft. and that there would be very few animals outside and even the few that would be outside would not be outside for long periods of time. We have now learned that the proposed project will include approximately 72,000 sq. ft. of building which likely means the increased presence of livestock which results in conditions that would materially adversely impact the People's Farm. We've also experienced damaging chemical trespassing from Mr. Vidovich's farm next door. Due to the chemical trespassing, we have already suffered hundreds of thousands of dollars in crop loss. We have yet to realize the total amount of monetary damage done by Mr. Vidovich's chemical trespassing.

In addition to the above, the following are some of the matters that need to be addressed before the County approves any portion of the Sandridge Project.

**Pests (Flies).** The Cattle Project will certainly come with a tremendous influx and proliferation of flies. Flies act as vectors for pollen just like bees. This means that the flies from the Cattle Project will transfer pollen from male cannabis plants to female cannabis plants which ultimately will cause catastrophic loss if the People's plants seed out. People's takes great pains and expends great effort in keeping the male cannabis plants from the female plants. If pollination from a male to a female occurs, the female will start developing seeds (which won't occur if the female is not pollinated). As a result, the female plant will focus its energy on seed production rather than growing the leaves and buds. The result is a seedy final product that has very little use to People's.



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Moreover, we intend to plant at least a portion of the field for seed production. This is a very delicate and sensitive endeavor requiring controlled pollination in order to preserve the quality and purity of the different seed strains. If there is an overconcentration of flies that are cross-pollenating different plants and creating a situation where plants are pollenated more than once, the result would be the destruction of certain strains and types. This would result in the loss of millions of dollars in revenue.

Finally, our licensing and permits allow us to grow flower. Some of our neighbors already grow flower. The risk is that flies get stuck in the flower bud (which is typically sticky). There is no real method of removing flies from cannabis flower, which is the finished good. This would also render the flower unsaleable. We have seen this happen in other areas where flies are abundant. Allowing the Sandridge Project would effectively eviscerate our ability to fully commercialize the People's Farm and unfairly restrict our growing options.

**Manure (Ammonia and Nitrates).** It is common knowledge that cattle feedlots and processing plants produce lots of ammonia and other nitrates. Containing and preventing the leaching of concentrations of nitrates and phosphorous into the ground water is critical. Even perfectly managed manure handling systems cannot contain 100% of concentrations of nitrates and phosphorous. The byproducts of manure also mineralize to ammonia. High levels of ammonia puts groundwater at risk of contamination. Uncontrolled or inadequately controlled feedlot runoff is a risk to water quality. Manure storage structures require careful attention to engineering, construction, operation and maintenance. If any of these aspects are deficient, the structure is at risk for failure and contamination likely. Microbes can also be a problem as they are capable of causing diseases called pathogens. While pathogens make up only a small portion of the microbial world, they get a lot of the attention. Some of the pathogens associated with animal manure include: *Escherichia coli* O157:H7, *Campylobacter* spp., *Salmonella*, and *Listeria*. The ways that manure pathogens reach water are largely the same as the way manure nutrients travel to water. The People's Farm relies, at least in part, on the use of groundwater. The way People's is required to grow cannabis crops, and really prefers to grow our crops, is much cleaner and safer than more traditional crops. In fact, the People's crops are even cleaner than organic crops. Here's why: Cannabis is regulated by the CDFR and other agencies the same as more traditional agriculture. However, cannabis is subject to even stricter regulation than traditional crops. The People's crops are subject to the strictest testing regime of any ag crop. Even more strict than pharmaceutical and organic crops. People's crops are tested down to the parts per billion.

People's is required to grow 100% clean. Everything People's uses to control pests and nourish its plants is organic or better. The only substances sprayed on the crops is consumable organic oils such as flaxseed and thyme oils. People's religiously adheres to, and prides itself on, good ag and farming practices. The contamination that could occur as a result of feedlot runoff and contaminants leaching into the groundwater could potentially cause People's crops to test "dirty" and, in the most extreme circumstances, could ruin entire crops causing millions of dollars in damages.

**Dust.** Another certainty is that the Sandridge Project will produce a tremendous amount of dust. The People's Farm is downwind of the prevailing winds. Dust drift can potentially have a catastrophic effect on the People's Farm and its ability to grow clean, healthy plants. It is well established that a dirty (i.e., dusty) plant is at a much higher risk of developing diseases or pest infestations. Dust and dirt also degrades the plant and materially harms the quality of the plant. A dirty and unclean environment usually attracts a variety of unwanted guests, including, but not limited to, bugs, mites, spiders, all of which attack the plant and cause damage. Certain of these pests, once present, are very good at staying alive, especially between harvests. This means that when a



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www.peoplescalifornia.com

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new harvest is planted, the existing pests can infest the new plants and affect the health as well as the size and quality of the harvest.

Dust and dirt can also build up on equipment, fans, filtration and odor control systems, ultimately resulting in the failure (or poor operation) of equipment vital to the People's Farm and important to being a good neighbor.

We ask that the City and County work with Sandridge in order to move the proposed Sandridge Project to a more suitable location. If that's not possible, then before the Sandridge Project progresses, we respectfully request that the County obtain a detailed and fully vetted abatement plan to address these concerns (groundwater contamination, dust, pest infestation). The abatement plan should be designed to: (i) neutralize and limit contaminants from reaching the groundwater that is so critical to the People's Farm; (ii) mitigate and minimize the migration of dust and the pests it carries; and (iii) mitigate the proliferation of flies. We cannot survive if this project is permitted to move forward next door.

For the reasons described above, People's respectfully requests that the County further evaluate the potential impacts of the Sandridge Project. We thank the County for this opportunity to comment.

Sincerely,

DocuSigned by:  
*Bernard Steimann*

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Bernard Steimann, Managing Member

# **ATTACHMENT C**

**People's Farming, LLC Comment Letter Dated January 2022**

**RE: Sandridge Cattle Project CUP No. 21-06**



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**VIA EMAIL**

City of Lemoore  
Attn: Nathan Olson, City Manager  
711 W. Cinnamon Drive  
Lemoore, California 93245  
Email: [nolson@lemoore.com](mailto:nolson@lemoore.com)

RE: Sandridge Cattle Project

Mr. Olson,

People's Farming, LLC ("People's"), owns and operates the agricultural operation located at 1805 S. 19<sup>th</sup> Avenue, Lemoore, CA 93245, which is a fully licensed, compliant and entitled cannabis farm (the "People's Farm"). People's has expended a tremendous amount of time, resources, and millions of dollars to license, entitle, develop, and build the People's Farm, and has significant plans to invest further in the Lemoore area. By way of example only, the City of Lemoore (the "City") is set to receive over \$300,000 in fee revenue from the first People's harvest that was recently completed. Once fully operational, we expect our operations to result in approximately \$1,000,000 in fees to the City per year.

It has come to our attention that Sandridge Cattle ("Sandridge") has a development project pending before Kings County (the "County"), adjacent to the City; specifically, a beef feedlot and processing plant to be located south of Lemoore in the County, bordered by State Route 198 to the north, State Route 41 to the east and Jackson Avenue to the south. The project includes a beef harvesting plant for 120 head of cattle per day for 250 days per year (30,000 head of cattle per year). The project also includes a feedlot for 12,600 head of cattle. The feedlot hours will be 7:00 a.m. to 4:00 p.m., seven days per week. The feedlot is expected to require up to 30 truckloads of feed per week and will generate up to four truckloads of cows per week (the "Cattle Project").

The Cattle Project will be directly adjacent to the People's Farm. To put it bluntly, allowing the Cattle Project next to the People's Farm will effectively destroy us. We have dedicated decades of time, effort and money to get to this point. Cannabis has the highest dollar per acre value of any other crop in California. We simply cannot move the People's Farm. We cannot put it elsewhere. We believe, however, that Sandridge owns 100's if not 1,000's of acres in other more suitable areas where running a feedlot and processing plant won't destroy the neighboring landowners' businesses.

Today, we preliminarily discussed some of these matters with you and understand that the City shares some of these same concerns. Therefore, we respectfully request that the City work with the County to delay taking action on the Cattle Project until the County, the City, the applicant, and the surrounding community have had an opportunity to assess the potential and likely impacts. The following are some of the matters we discussed today that need to be addressed before the County makes any decisions that are irreversible.

**Pests (Flies).** The Cattle Project will certainly come with a tremendous influx and proliferation of flies. Flies act as vectors for pollen just like bees. This means that the flies from the Cattle Project will transfer pollen from male cannabis plants to female cannabis plants which ultimately will cause catastrophic loss if the People's plants seed out. People's takes great pains and expends great effort in keeping the male cannabis plants from the



female plants. If pollination from a male to a female occurs, the female will start developing seeds (which won't occur if the female is not pollinated). As a result, the female plant will focus its energy on seed production rather than growing the leaves and buds. The result is a seedy final product that has very little use to People's.

Moreover, we intend to plant at least a portion of the field for seed production. This is a precise endeavor requiring controlled pollination in order to preserve the quality and purity of the different strains. If there is an overconcentration of flies that are cross-pollinating different plants and creating a situation where plants are pollinated more than once, the result would be the destruction of certain strains and types. This would result in the loss of millions of dollars in revenue.

Finally, our licensing and permits allow us to grow flower. Some of our neighbors already grow flower. The risk is that flies get stuck in the flower bud (which is typically sticky). There is no real method of removing flies from cannabis flower, which is the finished good. This would also render the flower unsaleable. We have seen this happen in other areas where flies are abundant. Allowing the Cattle Project would effectively eviscerate our ability to fully commercialize the People's Farm and unfairly restrict our growing options.

**Manure (Ammonia and Nitrates).** It is common knowledge that cattle feedlots and processing plants produce lots of ammonia and other nitrates. Containing and preventing the leaching of concentrations of nitrates and phosphorous into the ground water is critical. Even perfectly managed manure handling systems cannot contain 100% of concentrations of nitrates and phosphorous. The byproducts of manure also mineralize to ammonia. High levels of ammonia puts groundwater at risk of contamination. Uncontrolled or inadequately controlled feedlot runoff is a risk to water quality. Manure storage structures require careful attention to engineering, construction, operation and maintenance. If any of these aspects are deficient, the structure is at risk for failure and contamination likely.

Microbes can also be a problem as they are capable of causing diseases called **pathogens**. While pathogens make up only a small portion of the microbial world, they get a lot of the attention. Some of the pathogens associated with animal manure include: *Escherichia coli* O157:H7, *Campylobacter* spp., *Salmonella*, and *Listeria*. The ways that manure pathogens reach water are largely the same as the way manure nutrients travel to water.

The People's Farm relies, at least in part, on the use of groundwater. The way People's is required to grow cannabis crops, and really prefers to grow our crops, is much cleaner and safer than more traditional crops. In fact, the People's crops are even cleaner than organic crops. Here's why: Cannabis is regulated by the CDFA and other agencies the same as more traditional agriculture. However, cannabis is subject to even stricter regulation than traditional crops. The People's crops are subject to the strictest testing regime of any ag crop. Even more strict than pharmaceutical and organic crops. People's crops are tested down to the parts per billion.

People's is required to grow 100% clean. Everything People's uses to control pests and nourish its plants is organic or better. If anything is sprayed on the crops it's actually consumable organic oils such as flaxseed and thyme oils. People's religiously adheres to good ag and farming practices. People's prides itself on this. The contamination that could occur as a result of feedlot runoff and contaminants leaching into the groundwater could potentially cause People's crops to test "dirty" and, in the most extreme circumstances, could ruin entire crops causing millions of dollars in damages.

**Dust.** Another certainty is that the Cattle Project will produce a tremendous amount of dust. The People's Farm is downwind of the prevailing winds. Dust drift can potentially have a catastrophic effect on the People's Farm





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and its ability to grow clean, healthy plants. It is well established that a dirty (i.e., dusty) plant is at a much higher risk of developing diseases or pest infestations. Dust and dirt also degrades the plant and materially harms the quality of the plant. A dirty and unclean environment usually attracts a variety of unwanted guests, including, but not limited to, bugs, mites, spiders, all of which attack the plant and cause damage. Certain of these pests, once present, are very good at staying alive, especially between harvests. This means that when a new harvest is planted, the existing pests can infest the new plants and affect the health as well as the size and quality of the harvest.

Dust and dirt can also build up on equipment, fans, filtration and odor control systems, ultimately resulting in the failure (or poor operation) of equipment vital to the People's Farm and important to being a good neighbor.

We ask that the City assist in advocating for the County to work with Sandridge in order to move the proposed Cattle Project to a more suitable location. If that's not possible, then before the Cattle Project progresses, we respectfully request that the City require the County to provide the City with a detailed and fully vetted abatement plan to address these concerns (groundwater contamination, dust, pest infestation). The abatement plan should be designed to: (i) neutralize and limit contaminants from reaching the groundwater that is so critical to the People's Farm; (ii) mitigate and minimize the migration of dust and the pests it carries; and (iii) mitigate the proliferation of flies. We cannot survive if this project is permitted to move forward next door.

For the reasons described above, People's respectfully requests that the City further evaluate the potential impacts of the Cattle Project. We thank the City for this opportunity to comment.

Sincerely,

DocuSigned by:  
  
EAB74AF207464BE...  
Bernard Steimann  
Managing Member

CC: Victor Hernandez, Project Planner  
Kings County Community Development Agency  
1400 W. Lacey Blvd., Bldg. #6  
Hanford, CA 93230  
Via email: [Victor.Hernandez@co.kings.ca.us](mailto:Victor.Hernandez@co.kings.ca.us)

People's Farming, LLC  
Comment Letters –  
Dated December 4,  
2023 and January 2022



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December 4, 2023

**VIA EMAIL**

Kings County Community Development Agency – Planning Division  
1400 W. Lacey Blvd.  
Hanford, CA  
Email: chanda.jackson@co.kings.ca.us

RE: Sandridge Cattle Project CUP No. 23-05

Dear Kings County Planning Commission,

People's Farming, LLC ("People's"), which owns and operates the fully licensed and compliant cannabis agricultural operation located at 1805 S. 19th Avenue, Lemoore, CA 93245 (the "People's Farm"), hereby renews its objections to the beef processing plant portion of the Sandridge Project (the "Beef Processing Plant").

People's Farm had previously *conditionally* retracted its opposition to the Beef Processing Plant after meeting and conferring with owner John Vidovich. Due to (i) what we see are proposed changes to the Beef Processing Plant portion of the Sandridge Project and (ii) persistent chemical trespassing we've experienced from Mr. Vidovich's nearby operation, we are renewing the objections detailed in our January 2022 letter to the City of Lemoore.

Our February 2022 retraction of the objections raised in our January 2022 was conditional because, for instance, but not by way of limitation, we were told that the Beef Processing Plant would be no larger than 30,000 sq. ft. and that there would be very few animals outside and even the few that would be outside would not be outside for long periods of time. We have now learned that the proposed project will include approximately 72,000 sq. ft. of building which likely means the increased presence of livestock which results in conditions that would materially adversely impact the People's Farm. We've also experienced damaging chemical trespassing from Mr. Vidovich's farm next door. Due to the chemical trespassing, we have already suffered hundreds of thousands of dollars in crop loss. We have yet to realize the total amount of monetary damage done by Mr. Vidovich's chemical trespassing.

In addition to the above, the following are some of the matters that need to be addressed before the County approves any portion of the Sandridge Project.

**Pests (Flies).** The Cattle Project will certainly come with a tremendous influx and proliferation of flies. Flies act as vectors for pollen just like bees. This means that the flies from the Cattle Project will transfer pollen from male cannabis plants to female cannabis plants which ultimately will cause catastrophic loss if the People's plants seed out. People's takes great pains and expends great effort in keeping the male cannabis plants from the female plants. If pollination from a male to a female occurs, the female will start developing seeds (which won't occur if the female is not pollinated). As a result, the female plant will focus its energy on seed production rather than growing the leaves and buds. The result is a seedy final product that has very little use to People's.



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Moreover, we intend to plant at least a portion of the field for seed production. This is a very delicate and sensitive endeavor requiring controlled pollination in order to preserve the quality and purity of the different seed strains. If there is an overconcentration of flies that are cross-pollinating different plants and creating a situation where plants are pollinated more than once, the result would be the destruction of certain strains and types. This would result in the loss of millions of dollars in revenue.

Finally, our licensing and permits allow us to grow flower. Some of our neighbors already grow flower. The risk is that flies get stuck in the flower bud (which is typically sticky). There is no real method of removing flies from cannabis flower, which is the finished good. This would also render the flower unsaleable. We have seen this happen in other areas where flies are abundant. Allowing the Sandridge Project would effectively eviscerate our ability to fully commercialize the People's Farm and unfairly restrict our growing options.

**Manure (Ammonia and Nitrates).** It is common knowledge that cattle feedlots and processing plants produce lots of ammonia and other nitrates. Containing and preventing the leaching of concentrations of nitrates and phosphorous into the ground water is critical. Even perfectly managed manure handling systems cannot contain 100% of concentrations of nitrates and phosphorous. The byproducts of manure also mineralize to ammonia. High levels of ammonia puts groundwater at risk of contamination. Uncontrolled or inadequately controlled feedlot runoff is a risk to water quality. Manure storage structures require careful attention to engineering, construction, operation and maintenance. If any of these aspects are deficient, the structure is at risk for failure and contamination likely. Microbes can also be a problem as they are capable of causing diseases called pathogens. While pathogens make up only a small portion of the microbial world, they get a lot of the attention. Some of the pathogens associated with animal manure include: *Escherichia coli* O157:H7, *Campylobacter* spp., *Salmonella*, and *Listeria*. The ways that manure pathogens reach water are largely the same as the way manure nutrients travel to water. The People's Farm relies, at least in part, on the use of groundwater. The way People's is required to grow cannabis crops, and really prefers to grow our crops, is much cleaner and safer than more traditional crops. In fact, the People's crops are even cleaner than organic crops. Here's why: Cannabis is regulated by the CDFR and other agencies the same as more traditional agriculture. However, cannabis is subject to even stricter regulation than traditional crops. The People's crops are subject to the strictest testing regime of any ag crop. Even more strict than pharmaceutical and organic crops. People's crops are tested down to the parts per billion.

People's is required to grow 100% clean. Everything People's uses to control pests and nourish its plants is organic or better. The only substances sprayed on the crops is consumable organic oils such as flaxseed and thyme oils. People's religiously adheres to, and prides itself on, good ag and farming practices. The contamination that could occur as a result of feedlot runoff and contaminants leaching into the groundwater could potentially cause People's crops to test "dirty" and, in the most extreme circumstances, could ruin entire crops causing millions of dollars in damages.

**Dust.** Another certainty is that the Sandridge Project will produce a tremendous amount of dust. The People's Farm is downwind of the prevailing winds. Dust drift can potentially have a catastrophic effect on the People's Farm and its ability to grow clean, healthy plants. It is well established that a dirty (i.e., dusty) plant is at a much higher risk of developing diseases or pest infestations. Dust and dirt also degrades the plant and materially harms the quality of the plant. A dirty and unclean environment usually attracts a variety of unwanted guests, including, but not limited to, bugs, mites, spiders, all of which attack the plant and cause damage. Certain of these pests, once present, are very good at staying alive, especially between harvests. This means that when a



22 Executive Park, Suite 250, Irvine, CA 92614  
www.peoplescalifornia.com

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new harvest is planted, the existing pests can infest the new plants and affect the health as well as the size and quality of the harvest.

Dust and dirt can also build up on equipment, fans, filtration and odor control systems, ultimately resulting in the failure (or poor operation) of equipment vital to the People's Farm and important to being a good neighbor.

We ask that the City and County work with Sandridge in order to move the proposed Sandridge Project to a more suitable location. If that's not possible, then before the Sandridge Project progresses, we respectfully request that the County obtain a detailed and fully vetted abatement plan to address these concerns (groundwater contamination, dust, pest infestation). The abatement plan should be designed to: (i) neutralize and limit contaminants from reaching the groundwater that is so critical to the People's Farm; (ii) mitigate and minimize the migration of dust and the pests it carries; and (iii) mitigate the proliferation of flies. We cannot survive if this project is permitted to move forward next door.

For the reasons described above, People's respectfully requests that the County further evaluate the potential impacts of the Sandridge Project. We thank the County for this opportunity to comment.

Sincerely,

DocuSigned by:  
*Bernard Steimann*

24C8A752E2844DA...  
Bernard Steimann, Managing Member



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**VIA EMAIL**

City of Lemoore  
Attn: Nathan Olson, City Manager  
711 W. Cinnamon Drive  
Lemoore, California 93245  
Email: [nolson@lemoore.com](mailto:nolson@lemoore.com)

RE: Sandridge Cattle Project

Mr. Olson,

People's Farming, LLC ("People's"), owns and operates the agricultural operation located at 1805 S. 19<sup>th</sup> Avenue, Lemoore, CA 93245, which is a fully licensed, compliant and entitled cannabis farm (the "People's Farm"). People's has expended a tremendous amount of time, resources, and millions of dollars to license, entitle, develop, and build the People's Farm, and has significant plans to invest further in the Lemoore area. By way of example only, the City of Lemoore (the "City") is set to receive over \$300,000 in fee revenue from the first People's harvest that was recently completed. Once fully operational, we expect our operations to result in approximately \$1,000,000 in fees to the City per year.

It has come to our attention that Sandridge Cattle ("Sandridge") has a development project pending before Kings County (the "County"), adjacent to the City; specifically, a beef feedlot and processing plant to be located south of Lemoore in the County, bordered by State Route 198 to the north, State Route 41 to the east and Jackson Avenue to the south. The project includes a beef harvesting plant for 120 head of cattle per day for 250 days per year (30,000 head of cattle per year). The project also includes a feedlot for 12,600 head of cattle. The feedlot hours will be 7:00 a.m. to 4:00 p.m., seven days per week. The feedlot is expected to require up to 30 truckloads of feed per week and will generate up to four truckloads of cows per week (the "Cattle Project").

The Cattle Project will be directly adjacent to the People's Farm. To put it bluntly, allowing the Cattle Project next to the People's Farm will effectively destroy us. We have dedicated decades of time, effort and money to get to this point. Cannabis has the highest dollar per acre value of any other crop in California. We simply cannot move the People's Farm. We cannot put it elsewhere. We believe, however, that Sandridge owns 100's if not 1,000's of acres in other more suitable areas where running a feedlot and processing plant won't destroy the neighboring landowners' businesses.

Today, we preliminarily discussed some of these matters with you and understand that the City shares some of these same concerns. Therefore, we respectfully request that the City work with the County to delay taking action on the Cattle Project until the County, the City, the applicant, and the surrounding community have had an opportunity to assess the potential and likely impacts. The following are some of the matters we discussed today that need to be addressed before the County makes any decisions that are irreversible.

**Pests (Flies).** The Cattle Project will certainly come with a tremendous influx and proliferation of flies. Flies act as vectors for pollen just like bees. This means that the flies from the Cattle Project will transfer pollen from male cannabis plants to female cannabis plants which ultimately will cause catastrophic loss if the People's plants seed out. People's takes great pains and expends great effort in keeping the male cannabis plants from the



female plants. If pollination from a male to a female occurs, the female will start developing seeds (which won't occur if the female is not pollinated). As a result, the female plant will focus its energy on seed production rather than growing the leaves and buds. The result is a seedy final product that has very little use to People's.

Moreover, we intend to plant at least a portion of the field for seed production. This is a precise endeavor requiring controlled pollination in order to preserve the quality and purity of the different strains. If there is an overconcentration of flies that are cross-pollinating different plants and creating a situation where plants are pollinated more than once, the result would be the destruction of certain strains and types. This would result in the loss of millions of dollars in revenue.

Finally, our licensing and permits allow us to grow flower. Some of our neighbors already grow flower. The risk is that flies get stuck in the flower bud (which is typically sticky). There is no real method of removing flies from cannabis flower, which is the finished good. This would also render the flower unsaleable. We have seen this happen in other areas where flies are abundant. Allowing the Cattle Project would effectively eviscerate our ability to fully commercialize the People's Farm and unfairly restrict our growing options.

**Manure (Ammonia and Nitrates).** It is common knowledge that cattle feedlots and processing plants produce lots of ammonia and other nitrates. Containing and preventing the leaching of concentrations of nitrates and phosphorous into the ground water is critical. Even perfectly managed manure handling systems cannot contain 100% of concentrations of nitrates and phosphorous. The byproducts of manure also mineralize to ammonia. High levels of ammonia puts groundwater at risk of contamination. Uncontrolled or inadequately controlled feedlot runoff is a risk to water quality. Manure storage structures require careful attention to engineering, construction, operation and maintenance. If any of these aspects are deficient, the structure is at risk for failure and contamination likely.

Microbes can also be a problem as they are capable of causing diseases called **pathogens**. While pathogens make up only a small portion of the microbial world, they get a lot of the attention. Some of the pathogens associated with animal manure include: *Escherichia coli* O157:H7, *Campylobacter* spp., *Salmonella*, and *Listeria*. The ways that manure pathogens reach water are largely the same as the way manure nutrients travel to water.

The People's Farm relies, at least in part, on the use of groundwater. The way People's is required to grow cannabis crops, and really prefers to grow our crops, is much cleaner and safer than more traditional crops. In fact, the People's crops are even cleaner than organic crops. Here's why: Cannabis is regulated by the CDFA and other agencies the same as more traditional agriculture. However, cannabis is subject to even stricter regulation than traditional crops. The People's crops are subject to the strictest testing regime of any ag crop. Even more strict than pharmaceutical and organic crops. People's crops are tested down to the parts per billion.

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**Dust.** Another certainty is that the Cattle Project will produce a tremendous amount of dust. The People's Farm is downwind of the prevailing winds. Dust drift can potentially have a catastrophic effect on the People's Farm



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Dust and dirt can also build up on equipment, fans, filtration and odor control systems, ultimately resulting in the failure (or poor operation) of equipment vital to the People's Farm and important to being a good neighbor.

We ask that the City assist in advocating for the County to work with Sandridge in order to move the proposed Cattle Project to a more suitable location. If that's not possible, then before the Cattle Project progresses, we respectfully request that the City require the County to provide the City with a detailed and fully vetted abatement plan to address these concerns (groundwater contamination, dust, pest infestation). The abatement plan should be designed to: (i) neutralize and limit contaminants from reaching the groundwater that is so critical to the People's Farm; (ii) mitigate and minimize the migration of dust and the pests it carries; and (iii) mitigate the proliferation of flies. We cannot survive if this project is permitted to move forward next door.

For the reasons described above, People's respectfully requests that the City further evaluate the potential impacts of the Cattle Project. We thank the City for this opportunity to comment.

Sincerely,

DocuSigned by:  
  
EAB74AF207464BE...  
Bernard Steimann  
Managing Member

CC: Victor Hernandez, Project Planner  
Kings County Community Development Agency  
1400 W. Lacey Blvd., Bldg. #6  
Hanford, CA 93230  
Via email: [Victor.Hernandez@co.kings.ca.us](mailto:Victor.Hernandez@co.kings.ca.us)



4-Creeks, Inc. Response to  
People's Farming, LLC  
Comment Letter – Dated  
December 4, 2023



**DECEMBER 14, 2023**

Kings County Planning Commission  
Kings County Government Center  
1400 W. Lacey Boulevard,  
Hanford, CA 93230

**RE: Response to People’s Farming, LLC Comment Letter Dated December 4, 2023**

Dear Kings County Planning Commission,

We are writing in response to the concerns raised by People’s Farming, LLC (“People’s”) regarding the Sandridge Project in their comment letter dated December 4<sup>th</sup> 2023. After careful consideration of these concerns, we wish to present our perspective, illustrating that the project will not significantly impact People’s operations. This comment letter prepared by People’s Farming, LLC is included as Attachment A.

***Comment #1: The commenter asserts that People’s Farming was told that the Beef processing plant would be no larger than 30,000 sq. ft., and that there would be very few animals outside and the few animals that would be outside would not be outside for long periods of time.***

The size of the proposed beef processing plant is not a new development; it remains consistent with what was approved in July 2022. The project involves a 72,000 square foot processing plant, as originally proposed, and there is no increase in the size that could lead to a heightened negative impact on the neighboring operations.

The Project proposes an outdoor holding/staging area for cattle, which are held for a maximum of 1-2 days, with a capacity for staging up to 420 cows. This brief holding period and controlled environment significantly reduce any potential environmental or pest-related impacts. The size and operations of the proposed outdoor animal holding areas are consistent with what was approved in July 2022. There will not be more cattle held in this area and they would not be held there for longer periods of time than was previously approved.

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info@4-creeks.com

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**TULARE**  
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Tulare, CA 93274  
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info@4-creeks.com



***Comment #2: The commenter alleges that People's Farm has experienced damaging chemical trespassing from Mr. Vidovich's farm.***

Our chemical application plans undergo rigorous review and approval by the County, adhering to all regulatory requirements. Furthermore, a considerable portion of the subject Project property has been fallow land for the past 2-3 years, mitigating concerns about chemical trespassing.

***Comment #3: The commenter notes that a large influx of flies in the area would undermine the commercial viability of the People's Farm and limit their growing capabilities.***

The beef processing facility is not a feedlot, and the only outdoor area for cattle is the 16,000 square foot cattle loading area. This setup, combined with daily removal of blood, dead animals, and offal, as well as indoor processing and storage of products, significantly minimizes the potential for fly infestation. As a strictly regulated food processing facility, we adhere to standards that effectively limit such concerns.

***Comment #4: The commenter expresses concern that cattle feedlots and processing plants could contaminate groundwater with ammonia and nitrates, risking the purity and viability of the People's Farm's strictly regulated cannabis crops, potentially leading to significant financial losses.***

It's important to clarify that our project does not include a feedlot. While we understand the concerns raised with regard to manure contamination of groundwater resources, it is important to distinguish between the two types of cattle facilities. The proposed beef processing plant would produce significantly less manure than a feedlot would.

Regarding waste management, the project is committed to adhering to the highest standards to prevent any degradation of water quality. The project complies with all state and regional waste management programs to prevent water quality degradation. The wastewater from our operations is treated to remove harmful constituents and managed in a double-lined retention pond, ensuring compliance with the Central Valley-Wide Salt and Nitrate Control Programs. Implementation of Mitigation Measures HYD-1 and HYD-2 further ensures compliance with water quality standards and wastewater discharge requirements.

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***Comment #5: The commenter highlights concerns that dust from the Sandridge Project could detrimentally affect the People’s Farm, which is located downwind.***

The project is not anticipated to generate substantial amounts of dust. We have planned effective dust control measures during construction and operation phases. During construction, water sprays will be used on the ground to keep the dust settled and stockpiles of soil, sand, and other construction materials will be covered to prevent dust from being blown away. Dust is unlikely to be a significant concern during operations due to the limited size of the cattle loading area and because all of the roads/drive aisles that would be utilized by the project will be paved. Considering the location of Lemoore Raceway and a BMX raceway between People’s Farm and our project site, it is likely that these establishments would contribute more to dust concerns than our project.

***Comment #6: The commenter requests that the City and County either relocate the Sandridge Project or, if that’s not possible, obtain a comprehensive abatement plan before its progression. This plan should address groundwater contamination, dust, and pest issues to protect the People’s Farm, emphasizing the farm’s inability to thrive if the project proceeds in its current location.***

In response to the commenter’s request, it’s important to note that the Sandridge Project has already implemented extensive mitigation measures and adheres to strict regulatory requirements, which effectively serve as a comprehensive abatement plan.

Firstly, regarding groundwater contamination concerns, our project’s waste management system complies with state and regional programs to prevent water quality degradation. The treated wastewater is managed in a double-lined retention pond, aligned with the Central Valley-Wide Salt and Nitrate Control Programs. Additionally, the implementation of Mitigation Measures HYD-1 and HYD-2 ensures compliance with water quality standards and wastewater discharge requirements.

Concerning dust, the project is designed to generate minimal dust. Effective control measures during both construction and operation phases, such as water sprays and covering stockpiles, are in place. The limited size of the cattle loading area and paved roads further reduce the potential for dust issues. These measures, alongside the geographical factors like the presence of other nearby activities, ensure that dust concerns are adequately addressed.

Regarding pest concerns, notably flies, the nature of the beef processing facility significantly minimizes the risk. The facility is not a feedlot, and the cattle holding area is controlled and

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brief. The daily removal of waste and the indoor processing and storage of products further reduce the likelihood of a fly infestation.

These integrated approaches to waste management, dust control, and pest mitigation are in compliance with rigorous environmental standards and permits, including approvals from the Air Quality Board and the San Joaquin Regional Water Board. Consequently, a separate abatement plan specifically addressing these issues is not needed, as the current measures and regulatory compliance already cover these aspects comprehensively, ensuring the protection of neighboring properties like the People's Farm.

In conclusion, the Sandridge Project is committed to adhering to regulatory requirements and mitigating potential impacts on neighboring operations, including People's Farm. We have taken extensive measures to ensure that our project operates within the highest environmental and safety standards. We trust that this response addresses the concerns raised and demonstrates our commitment to responsible development.

Sincerely,

A handwritten signature in black ink that reads "Molly Baumeister". The signature is written in a cursive, flowing style.

Molly Baumeister, AICP  
Planner/Project Manager  
4-Creeks, Inc.

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# **ATTACHMENT A**

**People's Farming, LLC Comment Letter  
RE: Sandridge Cattle Project CUP No. 23-05**



December 4, 2023

VIA EMAIL

Kings County Community Development Agency – Planning Division  
1400 W. Lacey Blvd.  
Hanford, CA  
Email: chanda.jackson@co.kings.ca.us

RE: Sandridge Cattle Project CUP No. 23-05

Dear Kings County Planning Commission,

People’s Farming, LLC (“People’s”), which owns and operates the fully licensed and compliant cannabis agricultural operation located at 1805 S. 19th Avenue, Lemoore, CA 93245 (the “People’s Farm”), hereby renews its objections to the beef processing plant portion of the Sandridge Project (the “Beef Processing Plant”).

People’s Farm had previously *conditionally* retracted its opposition to the Beef Processing Plant after meeting and conferring with owner John Vidovich. Due to (i) what we see are proposed changes to the Beef Processing Plant portion of the Sandridge Project and (ii) persistent chemical trespassing we’ve experienced from Mr. Vidovich’s nearby operation, we renewing the objections detailed in our January 2022 letter to the City of Lemoore.

Our February 2022 retraction of the objections raised in our January 2022 was conditional because, for instance, but not by way of limitation, we were told that the Beef Processing Plant would be no larger than 30,000 sq. ft. and that there would be very few animals outside and even the few that would be outside would not be outside for long periods of time. We have now learned that the proposed project will include approximately 72,000 sq. ft. of building which likely means the increased presence of livestock which results in conditions that would materially adversely impact the People’s Farm. We’ve also experienced damaging chemical trespassing from Mr. Vidovich’s farm next door. Due to the chemical trespassing, we have already suffered hundreds of thousands of dollars in crop loss. We have yet to realize the total amount of monetary damage done by Mr. Vidovich’s chemical trespassing.

1

2

In addition to the above, the following are some of the matters that need to be addressed before the County approves any portion of the Sandridge Project.

**Pests (Flies).** The Cattle Project will certainly come with a tremendous influx and proliferation of flies. Flies act as vectors for pollen just like bees. This means that the flies from the Cattle Project will transfer pollen from male cannabis plants to female cannabis plants which ultimately will cause catastrophic loss if the People’s plants seed out. People’s takes great pains and expends great effort in keeping the male cannabis plants from the female plants. If pollination from a male to a female occurs, the female will start developing seeds (which won’t occur if the female is not pollenated). As a result, the female plant will focus its energy on seed production rather than growing the leaves and buds. The result is a seedy final product that has very little use to People’s.

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Moreover, we intend to plant at least a portion of the field for seed production. This is a very delicate and sensitive endeavor requiring controlled pollination in order to preserve the quality and purity of the different seed strains. If there is an overconcentration of flies that are cross-pollenating different plants and creating a situation where plants are pollenated more than once, the result would be the destruction of certain strains and types. This would result in the loss of millions of dollars in revenue.

Finally, our licensing and permits allow us to grow flower. Some of our neighbors already grow flower. The risk is that flies get stuck in the flower bud (which is typically sticky). There is no real method of removing flies from cannabis flower, which is the finished good. This would also render the flower unsaleable. We have seen this happen in other areas where flies are abundant. Allowing the Sandridge Project would effectively eviscerate our ability to fully commercialize the People's Farm and unfairly restrict our growing options.

**Manure (Ammonia and Nitrates).** It is common knowledge that cattle feedlots and processing plants produce lots of ammonia and other nitrates. Containing and preventing the leaching of concentrations of nitrates and phosphorous into the ground water is critical. Even perfectly managed manure handling systems cannot contain 100% of concentrations of nitrates and phosphorous. The byproducts of manure also mineralize to ammonia. High levels of ammonia puts groundwater at risk of contamination. Uncontrolled or inadequately controlled feedlot runoff is a risk to water quality. Manure storage structures require careful attention to engineering, construction, operation and maintenance. If any of these aspects are deficient, the structure is at risk for failure and contamination likely. Microbes can also be a problem as they are capable of causing diseases called pathogens. While pathogens make up only a small portion of the microbial world, they get a lot of the attention. Some of the pathogens associated with animal manure include: Escherichia coli O157:H7, Campylobacter spp., Salmonella, and Listeria. The ways that manure pathogens reach water are largely the same as the way manure nutrients travel to water. The People's Farm relies, at least in part, on the use of groundwater. The way People's is required to grow cannabis crops, and really prefers to grow our crops, is much cleaner and safer than more traditional crops. In fact, the People's crops are even cleaner than organic crops. Here's why: Cannabis is regulated by the CDFR and other agencies the same as more traditional agriculture. However, cannabis is subject to even stricter regulation than traditional crops. The People's crops are subject to the strictest testing regime of any ag crop. Even more strict than pharmaceutical and organic crops. People's crops are tested down to the parts per billion.

People's is required to grow 100% clean. Everything People's uses to control pests and nourish its plants is organic or better. The only substances sprayed on the crops is consumable organic oils such as flaxseed and thyme oils. People's religiously adheres to, and prides itself on, good ag and farming practices. The contamination that could occur as a result of feedlot runoff and contaminants leaching into the groundwater could potentially cause People's crops to test "dirty" and, in the most extreme circumstances, could ruin entire crops causing millions of dollars in damages.

**Dust.** Another certainty is that the Sandridge Project will produce a tremendous amount of dust. The People's Farm is downwind of the prevailing winds. Dust drift can potentially have a catastrophic effect on the People's Farm and its ability to grow clean, healthy plants. It is well established that a dirty (i.e., dusty) plant is at a much higher risk of developing diseases or pest infestations. Dust and dirt also degrades the plant and materially harms the quality of the plant. A dirty and unclean environment usually attracts a variety of unwanted guests, including, but not limited to, bugs, mites, spiders, all of which attack the plant and cause damage. Certain of these pests, once present, are very good at staying alive, especially between harvests. This means that when a

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new harvest is planted, the existing pests can infest the new plants and affect the health as well as the size and quality of the harvest.

Dust and dirt can also build up on equipment, fans, filtration and odor control systems, ultimately resulting in the failure (or poor operation) of equipment vital to the People's Farm and important to being a good neighbor.

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We ask that the City and County work with Sandridge in order to move the proposed Sandridge Project to a more suitable location. If that's not possible, then before the Sandridge Project progresses, we respectfully request that the County obtain a detailed and fully vetted abatement plan to address these concerns (groundwater contamination, dust, pest infestation). The abatement plan should be designed to: (i) neutralize and limit contaminants from reaching the groundwater that is so critical to the People's Farm; (ii) mitigate and minimize the migration of dust and the pests it carries; and (iii) mitigate the proliferation of flies. We cannot survive if this project is permitted to move forward next door.

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For the reasons described above, People's respectfully requests that the County further evaluate the potential impacts of the Sandridge Project. We thank the County for this opportunity to comment.

Sincerely,

DocuSigned by:  
*Bernard Steimann*  
24C8A752E2844DA...  
Bernard Steimann, Managing Member

# **ATTACHMENT B**

Wind Pattern Analysis

# WIND PATTERN ANALYSIS

## *Environmental Implications for the Proximity of Sandridge Beef Plant to People's Farm*

### INTRODUCTION

People's Farm has raised concerns that the proximity of the Sandridge Beef Plant project could result in dust and fly-related issues, impacting their crop yield and quality. This report evaluates the potential impact of the proposed beef plant project on People's Farm, with a specific focus on concerns regarding dust and flies.

### WIND PATTERNS AND PROJECT SITE ANALYSIS

In assessing the potential environmental impact of the proposed project on People's Farm, it is crucial to understand the regional wind patterns as they play a pivotal role in the dispersion of agricultural by-products, such as dust and flies. The closest meteorological data, sourced from the Lemoore NAS/Reeves station, indicates that the prevailing winds are predominantly from the North-Northwest (NNW) to Northwest (NW) (Attachment A). Given the geographical layout, with People's Farm situated approximately 0.35 miles directly west of the project site, it is positioned outside the primary pathway of these prevailing winds (Attachment B). Consequently, this spatial relationship significantly reduces the risk of airborne particulates from the project drifting towards People's Farm. The infrequent winds from the West to Southwest that would be required to impact People's Farm constitute a minimal percentage of the wind direction frequency, further diminishing the likelihood of cross-transportation of dust and flies. This analysis underscores the advantageous siting of the project in relation to People's Farm concerning wind-borne transmission concerns.

### WIND SPEEDS AND ENVIRONMENTAL DISPERSAL

The Gaussian dispersion model was utilized to estimate the concentration of particulate matter with an aerodynamic diameter of 10 micrometers (PM10) at a distance of 500 meters (0.31 miles) with a maximum wind speed of 20 miles per hour. The Gaussian dispersion model applies the Gaussian plume equation to estimate the concentration of pollutants dispersed in the atmosphere. The equation is expressed as:

$$C = \frac{Q}{(2\pi\sigma_y\sigma_z u)} \exp\left(-\frac{y^2}{2\sigma_y^2}\right) \left[ \exp\left(-\frac{(z-H)^2}{2\sigma_z^2}\right) + \exp\left(-\frac{(z+H)^2}{2\sigma_z^2}\right) \right]$$

Where:

- C is the concentration of the pollutant (g/m<sup>3</sup>).
- Q is the emission rate (g/s).
- u is the wind speed (m/s).
- $\sigma_y$  and  $\sigma_z$  are the dispersion coefficients in the crosswind and vertical directions.
- y is the crosswind distance from the source.
- z is the height at which concentration is calculated.
- H is the effective emission height (m).

The following assumptions were used in this assessment.

- Emission Rate: The emission rate of PM10 was assumed to be 0.2 grams per second. This emissions rate was estimated based on a publication from the US EPA (attachment C), which identifies the national average PM10 emissions factor for cattle feedlots as 17 tons/1,000 head/year.
- Particle Size: The aerodynamic diameter of the particles was considered to be 10 micrometers.
- Effective Emission Height: The height of emission was conservatively assumed to be 3 meters.
- Wind Speed: A wind speed of 8.9 meters per second (20 mph) was considered.
- Atmospheric Stability: A Pasquill stability class D was assumed.
- Surface Roughness: A surface roughness of 0.2 meters was conservatively assumed.
- Dispersion Coefficients: Based on stability class F and the downwind distance, the dispersion coefficients  $\sigma_y$  and  $\sigma_z$  were estimated to be proportional to the downwind distance raised to the power of 0.894.

Based on these assumptions, the PM10 concentration at a distance of 0.31 miles is estimated to be 5.54  $\mu\text{g}/\text{m}^3$ . The annual California ambient air quality standards for PM10 is 20  $\mu\text{g}/\text{m}^3$ . These findings provide a strong indication that the environmental dispersal of dust and flies from the project will not pose a significant risk to People's Farm.

### **POTENTIAL IMPACT ON PEOPLE'S FARM**

Given the wind patterns and environmental dispersal findings, the potential impact of the project on People's Farm can be characterized as minimal. The prevailing wind directions primarily bypass People's Farm, and the average wind speeds are not conducive to carrying substantial dust or fly populations across the 0.35-mile distance separating the two properties. Moreover, the behavioral patterns and physical capabilities of flies suggest that they are unlikely to traverse such distances, especially across prevailing winds. Dust particles, similarly, require stronger and more direct wind currents to be transported effectively. Considering these factors, the environmental risk posed by the project, in terms of wind-borne dust and flies to People's Farm, is significantly mitigated by natural and geographic conditions.

### **CONCLUSION**

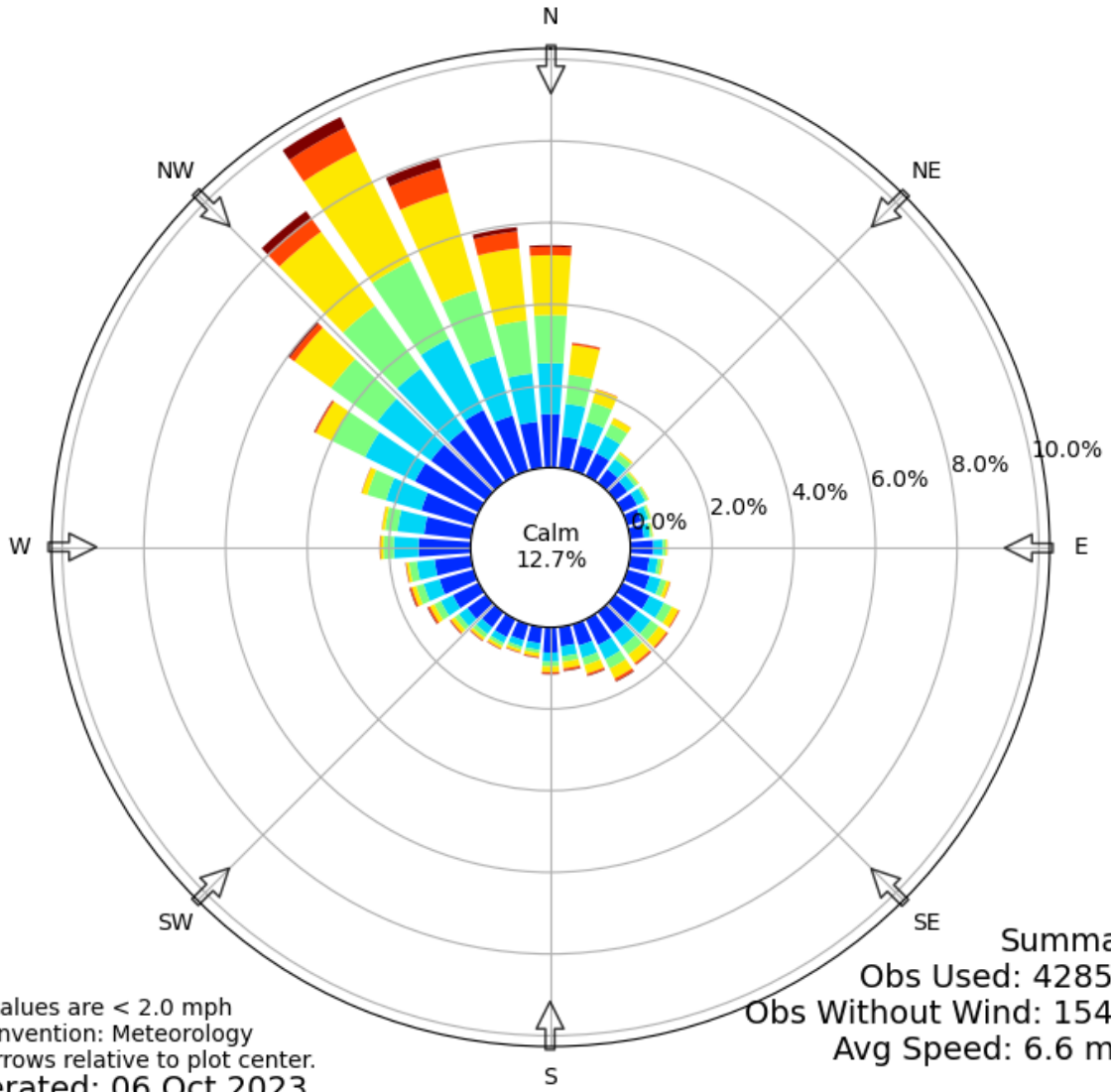
The analysis of prevailing wind patterns and speeds in relation to the proposed project and People's Farm indicates that the environmental impact, particularly concerning dust and flies, is expected to be negligible. The predominant wind directions do not align with the path between the project site and People's Farm, and the average wind speeds are likely insufficient to carry potential contaminants over the distance involved. These findings, supported by meteorological data and the natural barriers of wind direction and speed, provide a substantial basis for concluding that the concerns raised by People's Farm regarding the project are not substantiated by the current environmental conditions. It is reasonable to

expect that the project, considering its adherence to regulatory standards and the mitigating geographical factors, will not significantly impact People's Farm as initially feared. The report recommends ongoing monitoring to ensure that the actual impacts align with these predictions and to address any unforeseen changes promptly.

# ATTACHMENT A

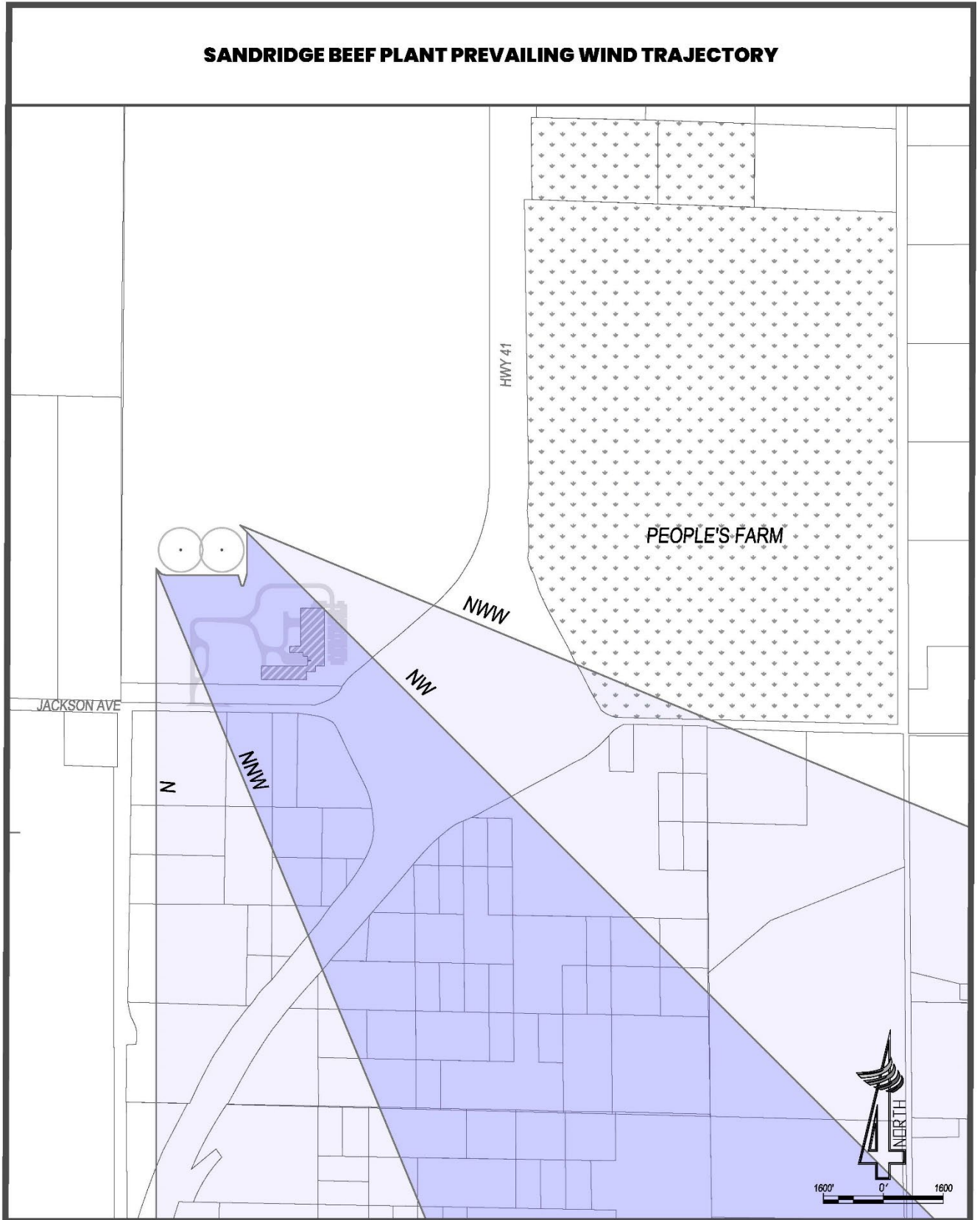


Windrose Plot for [NLC] LEMOORE NAS/REEVES  
Obs Between: 31 Dec 1969 11:00 PM - 05 Oct 2023 11:56 PM America/Los\_Angeles



**ATTACHMENT B**

**SANDRIDGE BEEF PLANT PREVAILING WIND TRAJECTORY**



## ATTACHMENT C

<b>Source Category:</b>	<b>Fugitive Dust from Beef Cattle Feedlots</b>
<b>SCC Code:</b>	<b>2805001000</b>
<b>Pollutants of Concern:</b>	<b>PM2.5, PM10</b>
<b>How is the PM National Air Pollutant Emission Trends inventory developed for this category?</b>	
<b>Current Methodology:</b>	
<ul style="list-style-type: none"><li>• Cattle feedlots are defined as establishments primarily engaged in feeding cattle for fattening.</li><li>• The calculation of total PM<sub>10</sub> emissions from cattle feedlots is based on the product of a national PM<sub>10</sub> emission factor of 17 tons/1,000 head per year of throughput, and the number of beef cattle reported to the “Census of Agriculture.”</li><li>• A particulate size fraction of 0.15, based on measurement data, is used to estimate PM<sub>2.5</sub> from PM<sub>10</sub>.</li><li>• The number of cattle on feed in each state that reported data are used for those states and the remaining number from the national totals are equally distributed to those states that haven’t reported specific totals.</li></ul>	
<b>Uncertainties / Shortcomings of Current Methods:</b>	
<ul style="list-style-type: none"><li>• The actual number of cattle on feed at any given time is approximately 10% of the total number of beef cattle. There is a possibility that the data used may not represent the actual number of cattle in feedlots.</li><li>• Activity is allocated equally to all states that have not reported state specific data to the Census of Agriculture.</li><li>• Activity is allocated equally to all counties in a state when county specific information is not reported.</li><li>• Feeder cows are kept on feedlots for periods of less than one year before being sent to the meat packer. Information on the capacity of each feedlot may not represent the total number processed.</li></ul>	
<b>How can State, Local, and Tribal agencies improve upon this methodology?</b>	
<ul style="list-style-type: none"><li>• Obtain local information on the number, location and timing of beef cattle numbers on feed.</li></ul>	



## Activity Variables Used to Calculate Fugitive Dust from Feedlots

### Current Variables/Assumptions Used:

- A national average emission factor has been used in the National Emission Inventory.
- The number of beef cattle in the county. [Census of Agriculture]

### Suggestions for Improved Variables:

- Use locally obtained emission factors, if more appropriate.
- Local information on number of beef cattle [state agriculture departments (many have data on web sites), County Agricultural Agent ]
- Determine any seasonal variations in the number of head in the feedlot.

### Where can I find Additional Information and Guidance?

**EPA Contact:** Mr. Dallas Safriet, Mail Drop D205-01  
Emission Factor and Inventory Group  
U.S. Environmental Protection Agency  
Research Triangle Park, NC 27711  
E-mail: Safriet.Dallas@epa.gov  
Telephone: 919 541-5371

**Meat Animal Production, Disposition, and Income** <http://www.usda.mannlib.cornell.edu/reports/nassr/livestock/zma-bb>

**National Air Pollutant Emission Trends Procedures Document for 1900-1999** <http://www.epa.gov/ttn/chief/publications.html>  
NOTE: This document is being revised.

**NEI Methodology Description** <http://www.epa.gov/ttn/chief/publications.html#reports>

**National Air Pollutant Emission Trends 1900-1998** <http://www.epa.gov/ttn/chief/trends/trends98/br owse.html>