



COUNTY OF HUMBOLDT
PLANNING AND BUILDING DEPARTMENT
CANNABIS SERVICES DIVISION

3015 H Street Eureka CA 95501
Fax: (707) 268-3792 Phone: (707)445-7541

November 20, 2018

Circle G Farms LLC
Seth Graves
P.O. Box 1129
Trinidad, CA 95570

RE: Permit Application No. (Apps#) 12957, APN: 532-055-009, CUP16-933 AND Apps#12939, APN: 532-056-009, ZCC16-639

Dear Seth Graves:

For Apps#12957, APN 532-055-009, an interim permit was offered in December 2017 for 6,220 square feet (sf) of existing outdoor and 8,615 sf of existing mixed-light cultivation. For Apps#12939, APN 532-056-009, an interim permit was offered in December 2017 for 3,500 sf of existing mixed-light cultivation. In order to remain in good standing we must receive proof that you did not cultivate in 2018.

After review and referral, the application submittals did not contain all of the required information. Additionally, it has been determined that your two parcels comprise a larger legal parcel. As a result, you may continue to work towards separate permits or combine into one. The following information is required in order to continue processing your permit application. **We request that these items – or contracts with estimated completion dates – be submitted within 30 days** to ensure we are able to process your permit to decision. **Please submit as one complete package with a copy of this letter.**

Below is listed the information we need to continue processing this permit application:

1. A mapped wetland is adjacent to the existing outdoor cultivation area on APN 532-055-009. Please submit a wetland delineation prepared by a qualified individual following the US Army Corps of Engineers Wetland Delineation manual.
2. Submit a revised site plan that contain the following (in addition to what is currently shown):
 - o Legal parcel or provide sub-map showing legal parcel – Per LLA-03-12 the configurations of APNs 532-055-002, 532-055-009, 532-056-009 and a portion of 532-052-003 combined comprise one legal parcel as described in Notice of Lot Lone Adjustment and Certificate of Subdivision Compliance 2006-9771
 - o Setback distance to Redwood National Park lands – cultivation on APN 532-056-009 appears to be within 600 feet. Either update site plan by a licensed surveyor to confirm the existing cultivation area meets the required set back or obtain a setback reduction waiver from National Park Service staff.
 - o Emergency turnaround for vehicles;
 - o Parking for two (2) vehicles;
 - o Buffers/setback distances for natural waterways, including streams, springs and ponds in conformance with the Streamside Management Area definition from the County's General Plan (reference BR-S5) as follows:

1. 100 feet measured as the horizontal distance from the top of bank or edge of riparian drip-line whichever is greater on either side of perennial streams.
 2. 50 feet, measured as the horizontal distance from the top of bank or edge of riparian drip-line whichever is greater on either side of intermittent streams.
 3. The width of the Streamside Management Areas shall not exceed 200 feet measured as a horizontal distance from the top of bank. The width of Streamside Management Areas shall be expanded to up to 200 feet measured as the horizontal distance from the top of bank as necessary to include slides or areas with visible evidence of slope instability.
3. Submit a revised operations plan that contains the following (in addition to what is currently provided):
 - o Revise Zoning Designation of APN 532-055-009 to TPZ only;
 - o Decibel noise measurements for the use of generators to ensure it do not exceed thresholds.
 - o Describes how the applicant will meet water storage deficiencies during the forbearance period.
 - o Provide the necessary forbearance period for the water diversion on-site.
 4. Due to the proximity to public lands, there is habitat for a rare or endangered species; therefore, a biological survey report prepared by a qualified biologist for all existing and proposed development is required. The minimum requirements of the report are:
 - o A review of relevant databases, literature, etc. regarding possible present species, for both animals and plants,
 - o A review of the site specific conditions as to the likelihood of hosting habitat for species, and
 - o If habitat is present, completion of protocol level surveys.
 5. The proposed project sites are located in an area that is characterized by highly instable soils. A written evaluation of the suitability of the project locations on both parcels for the economic lifespan of the project prepared by a California licensed engineer and a geologist (or an engineering geologist). This evaluation needs to consider whether the project will create or contribute to, or be impacted by, geological instability or geologic hazards for the economic lifespan of the project. This evaluation needs to be signed and stamped by the report preparer(s). This requirement is due to a high slope instability rating on the property and areas of 15% or greater slope or historic landslide.
 6. Proof of enrollment under the North Coast Regional Water Quality Control Board General Order R1-2015-0023. Please note that although enrollment is not required for permit approval, enrollment must be in place prior to initiation of new cultivation activities. Currently, your application only contains the signed page of the Notice of Intent to Enroll as a Tier 2 discharger, but the application and information was not filled out.
 7. Provide a copy of the Water Resources Protection Plan (WRPP) or status on its preparation and implementation for both parcels.
 8. A signed copy of an approved (or Notification) Lake and Streambed Alteration Agreement from CDFW for the surface water diversions for both parcels.
 9. Status of Division of Water Rights for the spring water source and 2017 reporting for both parcels.
 10. A Cultural Resources Study is needed for both parcels. Two archaeological sites have been recorded adjacent or within the proposed parcels. One archaeological site (located adjacent to the proposed project area), and the Anton Lyons Ranch point of interest is located within the proposed project area. Additionally, both parcels are located within the Yurok Ancestral Territory and they requested additional

information in their referral responses. Please provide a status on any coordination with the Yurok Tribe.

Without this requested information the Department is unable to fully evaluate this project for compliance with the findings specified in Humboldt County Code Sections 312-1.1.2 and 312-17 et seq., and the California Environmental Quality Act (CEQA). Until this additional information is received we must suspend further evaluation of your project application.

We have limited this list to the information essential to our understanding of your project's compliance with the findings for permit approval. If you believe the information requested is not required, then you may submit a letter indicating such and request that your project be taken to a Hearing Officer. However, going to hearing prior to having submitted evidence that all findings can be made will result in a Department recommendation of denial for the project.

We understand that securing this documentation may require additional work by you or by others on your behalf. However, a good faith effort to complete these items must be shown or the Department will have no option other than to schedule your project for a hearing and decision as described above.

When you have assembled all the requested material, submit these items with the deficiency letter as a package to the Cannabis Planner on Duty (CPOD) during regular business hours. Please include the Application Number, Assessor's Parcel Number (APN) and Attn: Caitlin Castellano in the complete package. **In order to devote our time to actively working on applications that are fully complete and ready to move forward, the county must strictly adhere to our policy of not accepting incomplete or individual submittals of required information. All required items must be submitted as a single package. In order to complete your application and restart the review process we will need to you to submit this deficiency letter with all required submittals as a package.**

Unless operating subject to a valid Interim Permit issued by the County, the filing of this application does not authorize the applicant to engage in any new commercial cannabis cultivation, processing, manufacture or distribution activity. No such activity shall commence until the application has been processed to decision and all requisite clearances, permits and/or licenses have been secured.

If you have questions about this letter, please contact me at CCastellano1@co.humboldt.ca.us or at 707-268-3731.

Sincerely,



Caitlin Castellano, Planner
Planner



Planning and Building Department
COUNTY OF HUMBOLDT
3015 H Street Eureka, CA 95501-4484

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*No #
for Applicant/Owner
No Agent*

*532-055-009
12957
532-056-009
12939*



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Circle G Farms LLC
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