

INITIAL STUDY AND DRAFT MITIGATED NEGATIVE DECLARATION

ARCATA LAND COMPANY, LLC

**COMMERCIAL CANNABIS OUTDOOR LIGHT-DEPRIVATION AND MIXED-LIGHT
CULTIVATION PROJECT**

APPLICATION No. 12255

Applicant:

Arcata Land Company LLC
3318 Foster Avenue
Arcata, CA 95521
Attn: Lane Devries

Lead Agency:

Humboldt County Planning & Building Department
3015 H Street
Eureka, CA 95501

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1.0 INTRODUCTION

1.1 Project Title

Arcata Land Company, LLC Commercial Cannabis Outdoor Light-Deprivation and Mixed-Light Cultivation Project.

1.2 Lead Agency Name and Address

Lead Agency Name: Humboldt County Planning & Building Department
Lead Agency Address: 3015 H Street, Eureka, CA 95501
Contact Person: Rodney Yandell
Phone Number: 707-445-7541

1.3 Project Sponsor's Name and Address

Owner / Applicant:
Arcata Land Company, LLC
Attn: Lane Devries
3318 Foster Avenue
Arcata, CA 95521

Agent:
Lenders Construction Services, LLC
Attn: Jeff Smith
P.O. Box 6218
Eureka, CA 95502

Civil Engineer:
Wallace Group
Attn: Shannon Jessica, P.E.
612 Clarion Court
San Luis Obispo, CA 93401

Biologist:
SHN Consulting Engineers & Geologists
Attn: Gretchen O'Brien
812 W. Wabash Ave.
Eureka, CA 95501

1.4 Project Location

The Project is located between 27th Street and Foster Avenue, west of the City of Arcata, in an unincorporated area of Humboldt County, California. The Project is located in Section 19 of Township 06 North, Range 01 East, in the Arcata North 7.5-minute USGS quadrangle. The Project site is located outside of the Coastal Zone, but within the City of Arcata Planning Area Boundary. See Figure 1, Site and Vicinity Map.

1.5 Assessor Parcels, Ownership, Zoning, and General Plan Designations

The Project site's assessor parcel numbers, ownership, County zoning and County General Plan land use designations are shown in Table 1, below. Also, See Figure 2, Parcel and Zoning Map.

TABLE 1
ASSESSOR PARCELS, OWNERSHIP, ZONING AND GENERAL PLAN DESIGNATIONS

Current APN¹	Ownership	Zoning²	General Plan³
506-231-021	Arcata Land Company LLC	MH-Q	AE
505-151-011	Arcata Land Company LLC	MH-Q	AE

Notes:

1. Source: Humboldt County Assessor’s Office and Humboldt County Web GIS, accessed May October 2020.
2. Source: Humboldt County Zoning Code, with verification thru Humboldt County Web GIS. MH = Heavy Industrial; Q = Qualified Combining Zone.
3. Source: Humboldt County General Plan, with verification thru Humboldt County Web GIS. AE = Agricultural Exclusive.

The Project parcels were the subject of a Lot Line Adjustment (“LLA”) recorded on May 14, 2020 (See Appendix A, LLA Record of Survey Recorded Map)¹. The County assigned Assessor’s Parcel Numbers in October 2020. The Project is located on one legal parcel and two tax parcels (See Appendix B, Certificate of Subdivision Compliance).

2.0 DESCRIPTION OF PROJECT

Arcata Land Company, LLC (“ALC”) proposes to develop a commercial cannabis outdoor light-deprivation and mixed-light cultivation project on property located between 27th Street and Foster Avenue, west of the City of Arcata, in an unincorporated area of Humboldt County, California (“Project”). The Project involves commercial cannabis cultivation activities on Assessor’s Parcel Numbers (“APNs”) 506-231-021 and 505-151-011, which total approximately 38.2 acres (“Site”). The Site is zoned Heavy Industrial with a Qualified Combining Zone. The Project involves only cultivation, with processing to occur at an existing permitted processing, manufacturing, and distribution facility located on a contiguous parcel (APN 506-231-018). Existing land uses on the Site are agricultural, while historic activities consisted of heavy industrial operations in support of the former timber products mill site located on APN 506-231-018.

Cultivation will take place in four areas (geographic blocks) of the Site totaling approximately 22.9 acres. Area 1 (6.2 acres) consists of existing hoop structures located in the northwest quadrant of the Site that will be converted from flower production to cannabis. New hoop structures totaling approximately 16.7 acres will be constructed in the northeast quadrant (Area 2; 3.9 acres), southeast quadrant (Area 3; 4.3 acres), and southwest quadrant (Area 4; 8.5 acres) of the Site. The Project includes a combination of outdoor light-deprivation cultivation (~75% of hoop structures or 17.2 acres) and mixed-light cultivation (~25% of hoop structures or 5.7 acres). The Project will also include ancillary support features, such as an administrative building (21,000

¹ The LLA Record of Survey Recorded Map references four parcels, designated as Parcel A, Parcel B, Parcel C, and Parcel D. Assessor Parcel Numbers were not assigned to the adjusted parcels until October 2020. Given that the majority of the technical studies were completed prior to assignment of the Assessor Parcel Numbers, they reference the parcels with letters, as shown on the LLA Record of Survey Recorded Map. For reference (and clarity), the LLA parcel letters and their corresponding Assessor Parcel Numbers are as follows: Parcel A (506-231-012); Parcel B (506-231-019, 506-231-022, 505-151-012); Parcel C (506-231-018); and Parcel D (506-231-021, 505-151-011).

square feet), propagation and office building (39,500 square feet), utility building (1,600 square feet), new onsite wastewater treatment system, an unpaved parking area, security fencing, and storm water management features (e.g., detention basins).

Preparation of the Site for the proposed development will require approximately 23,268 cubic yards of cut and 49,181 cubic yards of fill associated with onsite access road improvements, leveling of the Site with sand/soil in the areas of the hoop structures and walkways, installation of primary and reserve leach fields, and development of two storm water detention basins totaling approximately 0.8 acre-feet in storage size.

The Project is anticipated to require up to 116 full-time equivalent employees at full buildout. The existing agricultural operation on the Site requires approximately 40 full-time equivalent employees, resulting in a net increase of approximately 76 full-time equivalent employees (at full buildout). The operation will be seasonal, with the majority of employees needed beginning in April (planting) and extending through the end of October (final harvest). Hours of operation will generally be 6:30 a.m. to 3:30 p.m., although approximately 15 employees will work an extended evening shift to manage the propagation and cultivation process.

An existing agricultural well will provide irrigation water for the Project, while drinking water will be supplied by either, or a combination of, a new 100,000-gallon water storage tank fed by the existing well, or an existing potable water supply line serviced by the City of Arcata that crosses the Site. Project employees will have access to permanent restrooms in the new administration and office building that will be served by a new private onsite wastewater treatment system for sewage disposal, in addition to temporary restrooms for Site employees during peak harvest periods.

The Project has been designed to be consistent with Humboldt County Code Section 314-55.4 of Chapter 4 of Division I of Title III, Commercial Medical Marijuana Land Use Ordinance (“CMMLUO”), as well as state cultivation regulations administered by the California Department of Food and Agriculture (“CDFA”) (California Code of Regulations, Title 3, § 8000 et seq.)

2.1 Project Phasing / Buildout

The Project is anticipated to be built out in two primary phases:

1. Phase 1 (2021): Construction of the ancillary support buildings and completion of Site preparation activities, including grading, access road development, installation of utilities, fencing and security features, septic system, and storm water management controls. Operations will consist of cultivation activities within the existing hoop structures located in the northwest corner of the property (Area 1).
2. Phase 2 (late 2021 or 2022): Construction and operation of the additional hoop structures within Areas 2-4 of the Site.

Note: The phasing plan is based on current projections for anticipated buildout. Actual Site development will be dictated by the timing of permits/approvals and market conditions.

2.2 Hours / Days of Operation and Number of Employees

Hours of operation will generally be 6:30 a.m. to 3:30 p.m., Monday through Saturday, although approximately 15 employees will work an extended evening shift to manage the propagation and cultivation process. The Project is anticipated to require up to 116 full-time equivalent employees at full buildout. The existing agricultural operation on the Site requires approximately 40 full-time equivalent employees, resulting in a net increase of approximately 76 full-time equivalent employees (at full buildout). The operation will be seasonal, with the majority of employees needed beginning in April (planting) and extending through the end of October (final harvest).

2.3 Cultivation / Operations Plan

The Project entails approximately 1 million square feet of new outdoor cannabis cultivation within existing and new plastic hoop structures. Of the total cultivation, approximately 75% (750,000 square feet) will be outdoor light-deprivation cultivation, and approximately 25% (250,000 square feet) will be mixed-light cultivation using a combination of natural and artificial lighting (see Sheet 3.0, Site and Utility Plan).

The Project will employ on-site vegetative propagation (using “mothers” and “clones”) incidental and accessory to the cultivation process. A mother is a plant that is grown specifically for cloning purposes. The mother plants are kept in a constant vegetative state and are never transitioned into the flowering stage. Twelve hoop structures (hoop designators #164-#175) are currently anticipated for mother plants (see Sheet C3.2, Site and Utility Plan – Area 2). Once a mother plant has reached a stable point in its vegetative growth cycle, it is ready to be cloned or propagated. Cloning is the process of taking stem cuttings from a mother plant in order to develop new plants (the clones), genetically identical to the mother. Clones will be developed indoors within the propagation building located in the southwest corner of the Site (see Sheet 3.0, Site and Utility Plan, and Sheet C4.3, Details – Buildings). Once the cloned plant roots are 1-2 inches in length, which may take anywhere from 7-21 days, they will be moved to designated hoop structures (hoop designators #192-#197) to allow two weeks of “starter” growth (see Sheet C3.3, Site and Utility Plan – Area 4). Following the first two weeks of starter growth, the plants will be relocated to the cultivation hoop structures for growth and harvest.

Planting will occur within small pots for the mother plants, clones, and starter growth phase, with cultivation of mature plants occurring in planting crates, similar to those used in the existing flower cultivation process. Soil will be sourced from existing supplies on an adjacent parcel, and no importation of soil is anticipated.

Odors from the cultivation process will be controlled using fans that direct airflow through the hoop structures to a carbon filtration unit. In the event that carbon filtration is inadequate, odor

neutralizers such as Ecosorb, which is a water-based product that contains a proprietary blend of natural plant oils and bio-based surfactants that effectively adsorb to odor molecules, neutralizing their smell, may be utilized.

For the mixed-light component (~5.9 acres), strict adherence to night sky standards will be achieved. Light and glare will be controlled using blackout plastic/fabric to cover the hoop structures and prevent light from escaping.

The cultivation schedule will be optimized to allow consistent production levels (weekly harvests) to minimize fluctuations in labor needs and deliver stable volumes of products to customers. A summary of anticipated seasonal cultivation activities is shown in Table 2, below:

**TABLE 2
ANTICIPATED SCHEDULE OF SEASONAL CULTIVATION ACTIVITIES**

Planting Details			Cultivation Activities			
Planting Cycle	Planting Date	Approx. No. of Hoop Structures	Plant Maintenance (Pruning)	Plant Maintenance (De-fanning)	Plant Maintenance (De-fanning)	Harvest
1	Mar 31	9	Apr 21	May 26	Jun 16	Jun 23
2	Apr 7	9	Apr 28	Jun 2	Jun 23	Jun 30
3	Apr 14	9	May 5	Jun 9	Jun 30	Jul 7
4	Apr 21	9	May 12	Jun 16	Jul 7	Jul 14
5	Apr 28	9	May 19	Jun 23	Jul 14	Jul 21
6	May 5	9	May 26	Jun 30	Jul 21	Jul 28
7	May 12	9	Jun 2	July 7	Jul 28	Aug 4
8	May 19	9	Jun 9	Jul 14	Aug 4	Aug 11
9	May 26	9	Jun 16	Jul 21	Aug 11	Aug 18
10	Jun 2	9	Jun 23	Jul 28	Aug 18	Aug 25
11	Jun 9	9	Jun 30	Aug 4	Aug 25	Sep 1
12	Jun 16	9	Jul 7	Aug 11	Sep 1	Sep 8
13	Jun 23	9	Jul 14	Aug 18	Sep 8	Sep 15
14	Jun 30	9	Jul 21	Aug 25	Sep 15	Sep 22
15	Jul 7	9	Jul 28	Sep 1	Sep 22	Sep 29
16	Jul 14	9	Aug 4	Sep 8	Sep 29	Oct 6
17	Jul 21	9	Aug 11	Sep 15	Oct 6	Oct 13
18	Jul 28	9	Aug 18	Sep 22	Oct 13	Oct 20
19	Aug 4	9	Aug 25	Sep 29	Oct 20	Oct 27

Notes:

1. The anticipated schedule of seasonal activities is provided only as a guideline. Actual quantities and timing of activities will be dictated by weather, operational, and market conditions.

Following harvest, cannabis will be transported by a small pickup truck or off-road vehicle (e.g., golf cart or quad) with trailer a short distance (entirely within the confines of the property) to an approved processing, manufacturing, and distribution facility on an adjacent parcel (APN 506-231-018).

ALC has developed a detailed Operations Plan outlining security measures, inventory and quality control procedures, material storage, handling and disposal procedures, health and safety considerations, and waste management for the Project. See Appendix C, Operations Plan.

2.4 Water Source and Irrigation Plan

Water Source

Water for irrigation will be supplied by an existing permitted on-site groundwater well (County Permit Number 18/19-0783). The well is located east of the Project area on an adjoining parcel under common ownership (APN 505-151-012) (see Sheet 1, Site Plan, and Figure 3, Existing Conditions Site Map). The well is completed to a depth of approximately 150 feet and has an estimated yield of 400 gallons per minute according to the Well Completion Report (See Appendix D, County Well Permit). As documented by the well driller (Rich Well Drilling), the well is screened approximately 100' below surface in a state designated groundwater basin (Mad River Valley - Mad River Lowland; 1-008.01), and has no hydraulic connection to any surface water or larger shallow homogeneous aquifer (see Appendix E, Hydrologic Connectivity Letter).

Irrigation Plan

The Project's annual irrigation demand has been estimated at 52 acre-feet (17 million gallons), with a monthly maximum of approximately 12 acre-feet (4 million gallons) during the month of July. Irrigation water will be needed from April through October of each year, with no irrigation water anticipated during the months of November through March. The estimated output of the existing on-site groundwater well is approximately 1.8 acre-feet (576,000 gallons) per day, indicating sufficient water supply to service the irrigation demands of the Project.

The Project's estimated irrigation water usage, by month, is shown in Table 3, below.

TABLE 3
PROJECTED IRRIGATION WATER USAGE

	Month ¹						
	April	May	June	July	August	September	October
Gallons (millions)	0.9	2.3	3.5	4.0	3.4	2.2	0.7
Acre-Feet	2.6	7.1	10.9	12.2	10.5	6.6	2.2

Notes:

1. No irrigation water expected during the months of November through March.

Irrigation will be controlled by an automated irrigation system (e.g., Priva process control system) that will measure soil moisture and the surrounding environment to deliver precise water-

nutrient needs. The automated irrigation system will provide an advanced fertilizer mixing system, and control desired electrical conductivity, pH and flow rate. At all times, water will be applied using no more than agronomic rates.

2.6 Site Drainage

Existing Site Drainage

Drainage from the area of existing hoop structures in the northwest corner of the Site is routed to a retention basin located west of the hoop structures on an adjacent parcel under common ownership. Surface runoff for the remainder of the parcel is directed to onsite drainage ditches that tie into a drainageway that flows northwest into the same retention basin, or drain southward into a wetland slough (located on an adjoining parcel southeast of the Project area). The slough flows westward to an underground culvert, which is routed underneath the mill warehouse buildings and into Liscom Slough.

Project Site Drainage

The Project will add impervious area to the Site resulting from the construction of hoop houses, administration buildings, loading areas, and concrete walkways. Based on the topography of the Site, the post-development grading design splits runoff into two sub-catchments, one collects the runoff from the northern portion of the parcel, and the other the southern portion. The proposed northern sub-catchment will be primarily hoop structures and open space, while the proposed southern sub-catchment will be primarily hoop structures, open space, and office buildings located in the southwest corner of the Site. In order to separate applied irrigation water and storm water runoff, the proposed development utilizes hoop houses to isolate the cannabis crops. Runoff from the hoop structures is conveyed to storm water retention basins through a series of perforated pipes that run in between all of the hoop houses. The perforated pipes are connected to a larger network of storm drains which convey runoff to the retention basins. The Site has two proposed retention basins, one for each sub-catchment. The preliminary design for the northeast retention basin will provide 0.5 acre-feet of storage, and the southern retention basin will provide 0.33 acre-feet. Each basin will also be equipped with an outlet structure which will allow excess flow from larger storm events to be controlled and drained into the existing ditches adjacent to the property. (See Appendix F, Storm Water Management Design Memorandum).

2.7 Grading and Site Preparation

Preparation of the Site for the proposed development will require approximately 23,268 cubic yards of cut and 49,181 cubic yards of fill associated primarily with onsite access improvements, leveling of portions of the Site with sand, and development of storm water management features (e.g., detention basins).

The estimated cut quantity includes development of two storm water detention basins totaling 0.83 acre-feet in size. Basin 1 is located on adjoining APN 506-231-022 in the northeast corner of the Site, and totals 0.5 acre-feet in size. Basin 2 is located on adjoining APN 506-231-019 in the southeast corner of the Site, and totals 0.33 acre-feet in size. See Sheet C3.0, Site and Utility Plan, Sheet C3.1, Site and Utility Plan – Area 1, Sheet C3.3, Site and Utility Plan – Area 3, and Sheet C4.1, Details – Detention Basins.

The estimated fill quantity includes placement of sand/soil beneath the areas of the hoop structures and walkways. The sand/soil will be obtained from existing stockpiles on an adjacent parcel. The placement of sand/soil will involve only leveling for an even, consistent grade, and will not require compaction. See Sheet C4.0, Details – Hoop Houses.

In addition to the placement of sand/soil, Site development will include approximately 40,500 square feet of new concrete surfacing, comprised of concrete within the loading zones, walkways around the administration buildings, ADA parking stalls and ramps (12,698 square feet), green waste storage area (9,460 square feet), and walkways between hoops (18,342 square feet). See Sheet C3.0, Site and Utility Plan. Onsite access roads and the parking areas (with exception of ADA stalls and ramps) will be unpaved to minimize the quantity of impervious surface being added and to assist with storm water management at the Site.

2.8 Storage and Use of Fertilizers, Pesticides, and Other Products

ALC has considerable experience managing and using fertilizers, pesticides, and other products in existing agricultural operations on-site, and has developed detailed Standard Operating Procedures (“SOPs”) for use and management of pesticides, injury and illness prevention, and waste management. See Appendix G, Standard Operating Procedures. In addition, ALC has developed project-specific waste management and pest management plans, consistent with State of California cultivation licensing requirements. See Appendix H, Waste Management Plan, and Appendix I, Pest Management Plan.

In addition to robust company policies and procedures, storage and use of fertilizers and pesticides will be conducted in accordance with the Best Practicable Treatment or Control (BPTC) measures of State Water Resources Control Board (SWRCB) Order WQ 2019-0001-DWQ, which include requirements to apply fertilizers and soil amendments at only the proper agronomic rates, and to store materials in a manner that is protected from rainfall and erosion.

No storage of fertilizers, pesticides, or hazardous materials will occur on the proposed cultivation site. All storage will occur on an adjacent parcel under common ownership that is currently setup and permitted to store and manage fertilizers, pesticides, and hazardous materials used in existing agricultural operations. The materials will be stored in fully enclosed, watertight containers, and in a manner so that they cannot enter or be transported into surface waters or groundwater. These storage facilities are already in place.

2.9 Access and Parking

The Project area will be accessed using an existing 20' wide access road from an existing driveway entrance off of Foster Avenue (See Sheet C2.0, Existing Conditions, and Figure 3, Existing Conditions Site Map). The Foster Avenue driveway has been historically used for heavy industrial traffic associated with the former mill site and is configured to accommodate service and transport trucks (170' wide driveway apron). Onsite access roads and concrete walkways will be located to provide pedestrian, vehicular, and equipment access throughout the Project Site (see Sheet C3.0, Site and Utility Plan).

Primary and secondary designated parking lots with a total of 116 standard parking stalls and 3 Americans with Disabilities Act ("ADA") accessible stalls will be located near the southwest corner of the Site (adjacent to the administration building) and on APN 506-231-018 (under the same ownership) (see Sheet C3.0 and C3.2, Site and Utility Plan). In addition, 12 bicycle parking spaces will be provided, consistent with the recommendations of the Traffic Impact Study (see Sheet C3.2, Site and Utility Plan, and Appendix Q, Traffic Impact Study). The parking area will be developed consistent with County Zoning Regulations §314-109.1.

2.10 Drinking Water, Toilets and Handwashing Facilities

Drinking water will be supplied by either, or a combination of, a new 100,000-gallon water storage tank fed by the existing well, or an existing potable water supply line serviced by the City of Arcata that crosses the Site. The facility will have breakrooms and restrooms of sufficient size to accommodate the anticipated workforce. In addition, portable toilets may be utilized to accommodate seasonal workers during peak harvest periods. A shower room will be built for use by employees who work with chemicals and fertilizers, and there will be emergency eyewash stations at locations where chemicals and fertilizers are handled. See Sheet C4.3, Details - Buildings.

SHN Consulting Engineers and Geologists ("SHN") conducted a wastewater disposal field study and identified a suitable location for an onsite sewage disposal system located on the eastern boundary of the Project area. See Sheet C3.1, Site and Utility Plan – Area 1, Sheet C3.2, Site and Utility Plan – Area 2, and Appendix J, Septic Suitability Report.

2.11 Energy Supply and Use

The property is serviced by an existing Pacific Gas and Electric (PG&E) service line, and no new or expanded energy facilities are needed in connection with the Project. It is not anticipated that electrical generators will be required.

In addition to PG&E power, the Project proposes three natural gas boilers rated at 1 million British thermal units per hour (MMBTU/hr) that will be located in the Utility Building and be used to provide temperature control within the hoop structures (see Sheet C4.3, Details – Buildings).

Energy consumption and associated air quality and greenhouse gas emissions were evaluated by a retained air quality consultant (Illingworth & Rodkin, Inc.). See Appendix K, Air Quality and Greenhouse Gas Emissions Assessment.

2.12 Security Plan

Strict security measures will be employed at the premises, including the following:

- **Access control:** All entrances to the facility will be restricted by an access control system. 24-hour access will be provided to emergency responders via a Knox Box.
- **Fencing:** The Project area will be fenced with chain-link fencing or other similar fencing.
- **Alarm system:** Motion detection will help the security team and camera systems identify when intruders attempt to enter the property.
- **Lighting:** LED motion sensors will be discreetly placed in and around the facility in compliance with Universal Building code.
- **Security staff:** Security staff will perform routine inspections and monitor a surveillance system 24-hours per day.
- **Camera Systems:** All Project areas will be covered by camera systems for safety purposes and to help product loss prevention.
- **Limited Access:** Access will be limited to qualified personnel only.

The security measures will protect against theft and diversion not only from intruders, but also from staff members and visitors. This will be accomplished by limiting access to the Project Site and by surveillance monitoring of personnel and visitors at all times when in close proximity to the product. Strict inventory control measures will also be employed to prevent and detect diversion. See Appendix C, Operations Plan.

2.13 Safety Training

The cultivation operations will include safety protocols and safety training relevant to specific job functions. Training topics may include:

1. Emergency contact list which includes at a minimum, operation manager contacts, emergency responder contacts, and poison control contacts;
2. Emergency action response planning;
3. Employee accident reporting and investigation policies;
4. Fire prevention;
5. Hazard communication policies, including maintenance of material safety data sheets (MSDS);
6. Materials handling policies;

7. Job hazard analyses; and
8. Personal protective equipment policies, including respiratory protection.

See Appendix C, Operations Plan.

2.14 Site-Specific Technical Reports

The following technical reports and documentation have been prepared / compiled in support of this application:

Appendix A	LLA Record of Survey Recorded Map (Kelly O’Hern Associates, May 2020)
Appendix B	Certificate of Subdivision Compliance (March 2020)
Appendix C	Operations Plan (Lenders Construction Services, October 2020)
Appendix D	County Well Permit and Well Completion Report (April 2019)
Appendix E	Hydrologic Connectivity Letter (Rich Well Drilling, August 2020)
Appendix F	Storm Water Management Design Memorandum (Wallace Group, September 2020)
Appendix G	Standard Operating Procedures (ALC, March 2020)
Appendix H	Waste Management Plan (ALC, September 2020)
Appendix I	Pest Management Plan (ALC, September 2020)
Appendix J	Septic Suitability Design Report (SHN, June 2020)
Appendix K	Air Quality and Greenhouse Gas Emissions Assessment (Illingworth & Rodkin, September 2020)
Appendix L	Biological Resources Assessment (SHN, June 2020)
Appendix M	Wetland and Other Waters Delineation Report (SHN, June 2020)
Appendix N	FEMA Letter of Map Amendment (October 1997; June 2017)
Appendix O	EnviroStor Records Search Results (September 2020)
Appendix P	Phase I Environmental Site Assessment (Partner Engineering and Science, June 2015)
Appendix Q	Traffic Impact Study (W-Trans, October 2020)
	Cultural Resources Report (Archaeological Research and Supply Company, May 2018) (Confidential on file with the County)

2.15 Requested Entitlements

County Entitlements

ALC anticipates needing to obtain the following Humboldt County permits/authorizations for the Project:

- Approval of a **Use Permit** to allow approximately 1 million square feet (22.9 acres) of outdoor light-deprivation cultivation (~750,000 square feet; 17.2 acres) and mixed-light cultivation (~250,000 square feet; 5.7 acres) within hoop structures. The Project Site is zoned Heavy Industrial with a Qualified Combining Zone (MH-Q) (consistent with CMMLUO 55.4.8.2.1.2).
- Approval of **Building Permit(s)** or **Agricultural Exemption(s)** to allow construction of the hoop structures, administrative building (21,000 square feet), propagation and office building (39,500 square feet), utility building (1,600 square feet), and water storage tank (100,000 gallons).
- Approval of a **Grading Permit** or **Agricultural Exemption** to allow general Site grading for structures, onsite access roads, hoop walkways, and parking area, as well installation of two storm water detention basins totaling approximately 0.8 acre-feet in storage size.
- Approval of an **Environmental Health Permit** for a new onsite wastewater treatment system.
- Approval of an **Air Quality Authority to Construct / Permit to Operate** for operation of three natural gas boilers rated at 1 MMBTU/hr that will provide temperature control within the hoop structures.

Other Permits, Licenses, and Approvals

ALC anticipates needing to obtain the following additional permits, licenses and approvals for the Project:

- Approval of **Licenses** for Tier 1 and Tier 2 mixed-light cultivation issued by the State of California in accordance with the Medicinal and Adult-Use Cannabis Regulation and Safety Act (“MAUCRSA”). The California Department of Food and Agriculture (“CDFA”) CalCannabis Cultivation Licensing Division (“CalCannabis”) is responsible for the licensing of cannabis cultivation and is responsible for the regulation of cannabis cultivation and enforcement, as defined in the Medicinal and Adult Use Cannabis Regulation and Safety Act (MAUCRSA) and CDFA regulations related to cannabis cultivation (Bus. & Prof. Code, § 26103(a)).
- Enrollment and coverage under the State Water Resources Control Board (SWRCB) General Waste Discharge Requirements and Waiver of Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities (**Order WQ 2019-0001-DWQ**).
- Proof of a lake and streambed alteration agreement issued by the California Department of Fish and Wildlife or written verification that an agreement is not needed (Cal. Code Regs., tit. 3 § 8102(w)).

3.0 ENVIRONMENTAL SETTING

The Project Site is located approximately 2.9 miles east of the Pacific Ocean, at a 25-foot elevation above sea level. The regional climate is Mediterranean in nature with warm summers and cool winters. The microclimate in Arcata is characteristic of the coast, with measurable precipitation approximately 77 days per year and totaling 50 inches on average. On average, there are 174 sunny days per year. The July high is around 63 degrees Fahrenheit and the January low is typically around 42 degrees.

The Site is heavily disturbed from previous mill operations and is currently managed for agricultural production. Surface soils on the site have been imported or graded from other areas of the property over time. The Site's hydrology has been altered over time by drainage ditches constructed around the perimeter of the old industrial lumber rack and mills' footprint. Vegetative species on the Site primarily consist of non-native grass and forb species, supporting cutleaf geranium (*Geranium dissectum*), orchard grass (*Dactylis glomerata*), wild radish (*raphanus sativus*), velvet grass (*holcus lanatus*), sweet vanilla grass (*anthoxanthum odoratum*), and field mustard (*brassica rapa*).

3.1 Historic and Existing Land Uses

The Project Site has a long history of heavy industrial and agricultural use. The Site was in agriculture (hay or livestock production) until Simpson Lumber Company constructed an industrial mill site in the late 1940's or early 1950's. The Site has been modified many times with the addition of warehouses and lumber storage racks. Between 1988 and 1993, the storage racks were removed. The fields have since been graded and are currently used for agriculture. The existing greenhouses are used to grow flowers, while the fields have been used for both flowers and mixed row crops.

3.2 Surrounding Land Uses

The predominant land uses in the vicinity of the Project include additional land holdings of the Project applicant that are used for intensive commercial agricultural operations, with mixed commercial, agricultural and residential uses in the vicinity. Development associated with the City of Arcata is located approximately 1,000 feet to the east. There are no known schools, places of worship, public parks, or tribal cultural resources within 600 feet of the Project.

The closest offsite residences are two homes located on a single parcel off of 27th Street approximately 200 feet to the north and northeast of the Site. Beyond this single parcel, the next closest homes are located >500 feet to the east of the Project Site. St. Mary's Catholic Church is located >2,000 feet to the southeast. The City of Arcata School District owns property located a minimum of 600 feet to the east (although it is currently developed to agriculture). The Mad River Montessori Preschool / Fuente Nueva Charter School is located off of Janes Road approximately 2,000 feet to the southeast.

See Figure 3, Existing Conditions Site Map.

3.3 Geology

The Project Site is located in the “Arcata Bottoms,” a broad alluvial plain at the northern end of Humboldt Bay. Native materials at the Site consist of Quaternary aged alluvium. Alluvium on the Arcata Bottoms is described as unconsolidated coarse- to fine-grained sand and silt, with gravel in channel areas; the alluvium may locally interfinger with marine terrace deposits. At least some of the alluvium on the Arcata Bottoms is inferred to be Holocene in age, and appears to reflect deposition by the Mad River following the most recent sea level low stand. See Figure 6, Site Geology Map.

3.4 Soils

General Soil Units

The Natural Resources Conservation Service (“NRCS”) has mapped two primary soil units on the Project Site, as shown in Table 4, below (see also Figure 4, NRCS Soils Map).

TABLE 4
NRCS SOIL SUMMARY

Map Unit Symbol	Map Unit Name
127	Jollygiant, 0 to 2 percent slopes
210	Dungan, 0 to 2 percent slopes

Prime Agricultural Soils

According to the Humboldt County Web GIS, the entire Project Site is comprised of prime agricultural soils. See Figure 5, Prime Agricultural Soils Map.

3.5 Seismicity

The Project is not located within an Alquist-Priolo Earthquake Fault Zone. There are no active faults mapped within the Project location and it is not within an Earthquake Fault Zone as mapped by the California Geological Survey.

3.6 Biological Resources

SHN conducted a Biological Resources Assessment consisting of literature reviews and field observations and studies in order to identify potential sensitive biological resources that may occur within the Project area. Key findings from SHN’s assessment are summarized below:

- **Special Status Species:** A review of available literature indicates that 6 special status plant species and 15 special status animal species have a moderate or higher potential

to occur within the Project area; however, site investigations were conducted by SHN during appropriate seasons for detection, and no special status species were observed.

- **Designated Critical Habitat:** The Project areas do not contain designated critical habitat for any listed species. The closest designated critical habitat is for the Tidewater Goby (*Eucyclogobius newberryi*), 1.08 miles to the west of the Project area (Mad River Slough).
- **Sensitive Natural Communities:** No sensitive natural communities were identified within the Project area.
- **Wetland and Riparian Habitats:** A man-made roadside drainage ditch containing wetland indicators was mapped along the existing access road at the southwest border of the Project Site. This feature will be conserved, and will not be disrupted by Project activities (with exception of routine maintenance of the ditches, consistent with current practice).
- **Nesting Bird Habitat:** Locations with a shrub or tree canopy layer within the Project area may provide suitable nesting habitat for migratory birds. Additionally, some species, such as a western meadowlark (*Sturnella neglecta*), may nest in tall grasses.
- **Wildlife Movement Corridors:** No significant wildlife movement corridors were identified within the Project area, although some animals may use the existing and proposed roadways as movement corridors.

See Appendix L, Biological Resources Assessment, and Appendix M, Wetland and Other Waters Delineation Reports.

3.8 Flooding

According to an October 30, 1997 Letter of Map Amendment from the Federal Emergency Management Agency (“FEMA”), the Site is not located in a Special Flood Hazard Area, that is the area that would be inundated by a flood having a one percent chance of being equaled or exceeded in any given year (See Appendix N, FEMA Letter of Map Amendment).

3.9 Fire Hazard

The Project Site is located in an area of Low Fire Hazard rating and within the Arcata Fire Protection District. A new 100,000-gallon water storage tank will be located on the Site and available for fire suppression (See Sheet C3.2, Site and Utility Plan).

3.10 Hazardous Materials (Contamination)

A Phase I Environmental Site Assessment and a records search of the State of California’s EnviroStor database confirms that the Site has is not identified on a list of known hazardous materials locations, and that no known soil / groundwater contamination issues are present. See Appendix O, EnviroStor Records Search Results, and Appendix P, Phase 1 Environmental Site Assessment. As part of the sale of the property from Simpson Redwood Company a thorough

environmental assessment of the site was conducted and the property entered into a Voluntary Cleanup Agreement with the California Department of Toxic Substances Control (DTSC). Remediation work completed included the removal and off-site disposal of approximately 8,600 cubic yards of soil and the treatment of 1.2 million gallons of groundwater. DTSC certified the actions sufficiently addressed onsite contamination in February 1999 provided groundwater monitoring of the small VOC plume in the southeastern portion of the site continue. Groundwater monitoring continued until 2013 when the RWQCB and the DTSC agreed that the downward trend in concentrations of contaminants was sufficient to remove the semi-annual groundwater monitoring requirement. The area of the small VOC plume and groundwater monitoring is outside of the area proposed for the cannabis cultivation. The phase 1 ESA concludes that no additional investigation is needed.

4.0 CMMLUO APPLICATION CHECKLIST

This section addresses the relevant sections of the CMMLUO that pertain to application requirements and performance standards for new commercial cannabis activities. In addition, this section includes responses to the Commercial Medical Marijuana Land Use Ordinance Cultivation Application Checklist (“Application Checklist”) where the Application Checklist supplements or amplifies the requirements of the CMMLUO.

4.1 Operations Plan

ALC has developed detailed Standard Operating Procedures (SOPs) and an Operations Plan that outline security measures, inventory and quality control procedures, material storage, handling, and disposal procedures, health and safety considerations, processing practices, pest management and waste management for the proposed Project. See Appendix C, Operations Plan, Appendix G, Standard Operating Procedures, Appendix H, Waste Management Plan, and Appendix I, Pest Management Plan.

4.2 Site and Floor Plans

See Sheets C1.0 through C5.1, prepared by the Wallace Group.

4.3 CEQA Evaluation

See Section 6, CEQA Evaluation for an Initial Study of potential environmental impacts, utilizing the Environmental Checklist Form presented in Appendix G of the CEQA Guidelines.

4.4 Consent and Acknowledgements

4.4.1 Consent for Onsite Inspection

Applicant hereby consents for an onsite inspection of the Site by County officials at a prearranged date and time prior to issuance of any clearance or permit, and once annually thereafter.

4.4.2 Acknowledgement of Right to Reduce Cultivation Area

Applicant hereby acknowledges the County's right to reduce the size of the area allowed for cultivation in the event that environmental conditions, such as a sustained drought or low flows in the watershed in which the cultivation area is located will not support diversions for irrigation.

4.4.3 Acknowledgement of Right to Engage Local Tribes

Applicant hereby acknowledges that the County reserves the right to engage with local Tribes before consenting to the issuance of any clearance or permit, if cultivation operations occur within an Area of Traditional Tribal Cultural Affiliation.

4.4.4 Agricultural Employer Statement

Pursuant to the MMRSA, Health and Safety Code §26051(a)(8), the applicant hereby declares that it is an "agricultural employer," as defined in the Alatorre-Zenovich-Dunlap-Berman Agricultural Labor Relations Act of 1975 (Part 3.5 commencing with Section 1140) of Division 2 of the Labor Code), to the extent not prohibited by law.

In addition to the above declaration of status as an "Agricultural Employer" per Labor Code Sections 1140-1166.3, the applicant/employer hereby agrees to comply with all applicable federal, state, and local laws and regulations governing California Agricultural Employers, which may include: federal and state wage and hour laws, CAL/OSHA, OSHA, California Agricultural Labor Relations Act, and the Humboldt County Code (including the Building Code).

5.0 CMMLUO CONSISTENCY MATRIX

The Project’s consistency with the provisions and standards of the Commercial Medical Marijuana Land Use Ordinance (“CMMLUO”) (§314-55.4, Chapter 4, Division 1, Title III) is detailed in Table 5, below.

**TABLE 5
CMMLUO CONSISTENCY MATRIX**

CMMLUO Standard	Project Consistency
55.4.8.2. Outdoor and mixed light cultivation zoning districts.	Consistent. The Project Site is zoned MH-Q. Outdoor and mixed-light cultivation are allowed with a Use Permit in the MH zone.
55.4.8.2.1. Approvals for new outdoor and mixed light cultivation areas up to 10,000 sf on parcels 5 acres or larger in size in zoning districts RA, U, FP, DF, AG, or AE.	N/A. The Project Site is zoned MH-Q.
55.4.8.2.1.1. Parcels 320 acres or larger in size.	N/A. The Project Site is zoned MH-Q.
55.4.8.2.1.2. Outdoor and mixed light cultivation in C-2, C-3, MB, ML, and MH zoning districts.	Consistent. The Project Site is zoned MH-Q. Outdoor and mixed-light cultivation are allowed with a Use Permit in the MH zone.
55.4.8.2.1.3. Outdoor and mixed light cultivation in U, FP, DF, AG, or AE zoning districts on parcels between 1 and 5 acres.	N/A. The Project Site is zoned MH-Q.
55.4.8.2.1.4. Setbacks from existing residences on parcels under 5 acres.	N/A. The Project Site is located on a legal parcel approximately 38 acres in size.
55.4.8.2.2. Approvals for existing outdoor and mixed light cultivation areas.	N/A. The Project does not involve a pre-existing cultivation.
55.4.8.3. Approvals for indoor cultivation.	N/A. The Project does not involve indoor cultivation.
55.4.8.4. Allowed zoning districts for processing facilities.	N/A. The Project involves only cultivation with processing to occur at a permitted offsite location.
55.4.8.5. Allowed zoning districts for manufacturing.	N/A. The Project does not involve manufacturing.

CMMLUO Standard	Project Consistency
55.4.8.6. Allowed zoning districts for wholesale distribution facilities.	N/A. The Project does not involve wholesale distribution.
55.4.8.7. Allowed zoning districts for nurseries.	N/A. The Project includes propagation as an incidental and subordinate use to the cultivation, but does not involve a nursery (i.e., the Project will not produce commercial cannabis nursery products for retail sale).
55.4.8.10. No more than four cannabis permits per person.	Consistent. The Project applicants will hold no more than four cannabis activity permits in Humboldt County.
55.4.9. Permit types.	Consistent. Outdoor and mixed-light cultivation are permitted in the MH zone with a Use Permit.
55.4.9.1. Processing of cannabis.	Consistent. Processing will occur at a permitted off-site location.
55.4.9.2. Combined applications.	N/A. The Project does not involve a request for a combined application.
55.4.9.3. Combination of permit types.	N/A. The Project does not involve a request for a combination of permit types.
55.4.9.4. Pre-application registration of existing cultivation site.	N/A. The Project does not involve a request for recognition of cultivation areas in existence prior to January 1, 2016.
55.4.9.5. Applications for commercial cannabis activity on Tribal Land.	N/A. The Project is not located on Tribal Lands.
55.4.10. Application requirements.	
a. Contact info for applicant	Consistent. See Section 1.3.
b. Written consent of owner	N/A. Project applicant is also the property owner.
c. Site plan	Consistent. See Sheets C1.0 through C5.1.
d. Cultivation and operations plan	Consistent. See Section 2.3 and Appendix C, Operations Plan.

CMMLUO Standard	Project Consistency
e. Copy of SWRCB permit	N/A. The Project's water demands will be served by existing permitted groundwater wells. See Sheet C2.0, Existing Conditions, and Figure 3, Existing Conditions Site Map.
f. Description of water source, storage, irrigation, and projected water usage.	Consistent. See Section 2.4.
g. Copy of Notice of Intent for NCRWQCB Order No. 2015-0023.	Consistent. Upon Use Permit approval, the Project will enroll in State Water Resources Control Board (SWRCB) Order WQ 2019-0001-DWQ.
h. Copy of Streambed Alteration Agreement.	N/A. The Project does not involve activities requiring application for a Streambed Alteration Agreement from the Department of Fish & Wildlife. See Appendix E, Hydrologic Connectivity Letter.
i. Copy of County well permit.	Consistent. See Appendix D, County Well Permit.
j. Copy of less-than-3-acre conversion exemption or timberland conversion permit.	N/A. The Project does not involve an area of timberland conversion.
k. Consent for onsite inspection.	Consistent. See Section 4.4.1.
l. Source of electrical power for indoor cultivation facilities and how it will meet energy requirements.	N/A. The Project does not involve a request for indoor cultivation facilities.
m. County right to reduce cultivation area.	Consistent. See Section 4.4.2.
n. County right to engage local Tribes.	Consistent. See Section 4.4.3.
55.4.11. Performance standards for cultivation and processing operations.	
a. Compliance with all laws.	Consistent. Project activities will be conducted in compliance with all laws or the

CMMLUO Standard	Project Consistency
	terms of a written approved compliance agreement.
b. Possession of valid licenses.	Consistent. The applicant will obtain and maintain current required licenses from the State of California.
c. Compliance with SWRCB regulations.	Consistent. The Project will maintain compliance with statutes, regulations and requirements of the SWRCB, including enrollment in Order WQ 2019-0001-DWQ). .
d. Setbacks.	Consistent. See Sheets C1.0 through C5.1.
e. Enrollment in NCRWQCB Order No. 2015-0023.	Consistent. Upon Use Permit approval, the Project will enroll in SWRCB Order WQ 2019-0001-DWQ)..
f. Tier 1 dischargers.	N/A. Upon Use Permit approval, the Project will enroll in State Water Resources Control Board (SWRCB) WQ 2019-0001-DWQ). .
g. Compliance with DFW Streambed Alteration Agreements.	N/A. The Project does not involve activities requiring application for a Streambed Alteration Agreement from the Department of Fish & Wildlife. See Appendix E, Hydrologic Connectivity Letter.
h. Compliance with less-than-3-acre conversion exemption or timberland conversion permit.	N/A. The Project does not involve an area of timberland conversion.
i. Consent to annual inspections.	Consistent. See Section 4.4.1.
j. Hazardous materials and wastes.	Consistent. Use and storage of hazardous materials will be performed in compliance with State and local laws and regulations. See Section 2.8, Appendix G, Standard Operating Procedures, Appendix H, Waste Management Plan, and Appendix I, Pest Management Plan.
k. Payment of fees.	Consistent. The applicant will pay all applicable application and annual inspection fees.

CMMLUO Standard	Project Consistency
l. Water surface diversion.	N/A. The Project's water demands will be served by existing groundwater wells.
m. Trucked water.	Consistent. Water will be supplied by onsite wells, and truck water shall not be used except for emergencies.
n. Conditions of approval.	Consistent. The Project will comply with all special conditions of approval which may be imposed on the Use Permit.
o. Generator noise.	N/A. The Project does not involve use of a generator.
p. Storage of fuel.	Consistent. Fuel will be stored and handled in compliance with applicable state and local laws and regulations. See Section 2.8.
q. Agricultural employer statement.	Consistent. See Section 4.4.4.
r. Compliance with CA Agricultural Employer laws.	Consistent. The Project will comply with all applicable federal, state, and local laws and regulations governing California Agricultural Employers.
s. Processing Practices.	N/A. Processing will occur at a permitted off-site location.
t. Employee Safety Practices.	Consistent. See Appendix C, Operations Plan and Appendix G, Standard Operating Procedures.
u. Processing Plan.	N/A. Processing will occur at a permitted off-site location.
Performance standards for mixed light cultivation.	
v. Artificial lighting.	Consistent. The Project applicant will shield hoop structures so that little to no light escapes. Light and glare will be controlled using blackout plastic/fabric to cover the hoop structures and prevent light from escaping. Light will not escape at a level that is visible

CMMLUO Standard	Project Consistency
	from neighboring properties between sunset and sunrise.
w. Light shielding.	Consistent. The Project will comply with the International Dark Sky Association standards for Lighting Zone 0 and Lighting Zone 1, and be designed to regulate light spillage onto neighboring properties resulting from backlight, uplight, or glare.
55.4.17. Sunset for applications.	Consistent. Project applications were submitted prior to the 12/31/16 sunset date.

6.0 CEQA EVALUATION

6.1 Environmental Factors Potentially Affected

The proposed Project will not have a significant effect on the environment, as indicated by the checklist on the following pages.

- | | | |
|---|--|---|
| <input checked="" type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input checked="" type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input checked="" type="checkbox"/> Energy |
| <input checked="" type="checkbox"/> Geology and Soils | <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards and Hazardous Materials |
| <input checked="" type="checkbox"/> Hydrology and Water Quality | <input type="checkbox"/> Land Use and Planning | <input type="checkbox"/> Mineral Resources |
| <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Population and Housing | <input checked="" type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input checked="" type="checkbox"/> Transportation | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Wildfire | <input type="checkbox"/> Mandatory Findings of Significance |

6.2 Determination

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



1/26/2021

Signature

Date

Rodney Yandell

Humboldt County Planning and Building Department

Printed Name

For

6.3 Evaluation of Environmental Impacts

The following checklist is taken from the Environmental Checklist Form presented in Appendix G of the CEQA Guidelines. The checklist is used to describe the impacts of the proposed Project and identify project-specific mitigation measures, as appropriate: For this checklist, the following designations are used:

Potentially Significant Impact: An impact that could be significant, and for which no mitigation has been identified. If any potentially significant impacts are identified, an EIR must be prepared.

Less Than Significant with Mitigation Incorporated: An impact that requires mitigation to reduce the impact to a less-than-significant level.

Less-Than-Significant Impact: Any impact that would not be considered significant under CEQA relative to existing standards.

No Impact: The Project would not have any impact.

I. AESTHETICS.

Except as provided in Public Resources Code Section 21099, would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

- a. For purposes of determining significance under CEQA, a scenic vista is defined as a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. In addition, some scenic vistas are officially designated by public agencies, or informally designated by tourist guides. A substantial adverse effect to such a scenic vista is one that degrades the view from a designated view spot. No governmentally designated scenic vista or specific scenic view spot has been identified within the vicinity of the Project. Further, the project Site is not accessible to the public and is surrounded by privately-owned lands. Therefore, the Project will have **no impact** on a scenic vista.

- b. According to the California Scenic Highway Mapping System, there are no designated state scenic highways in Humboldt County. The nearest eligible scenic highway (as listed in Sections 263.1 through 263.8 of the California Streets and Highways Code) is Highway 101 located greater than one mile to the east of the Project Site. In addition, the Project does not involve removal or damage to scenic resources such as trees rock outcroppings, or historic buildings. Therefore, the Project would result in **no impact** to scenic resources within a state scenic highway.

- c. The Project Site is a component of a large private land holding (350+ acres) of the Project applicant that is currently used as a cut flower and general agricultural operation. The predominant land uses in the vicinity of the Project include additional land holdings of the Project applicant, as well as mixed commercial, agricultural and scattered rural residential uses. The surrounding vicinity is sparsely populated with approximately five residences located within 1,000 feet of the Project Site. The closest offsite residences are two homes located on a single parcel off of 27th Street approximately 200 feet to the north and northeast of the Site. Beyond this single parcel, the next closest homes are located >500 feet to the east of the Project Site.

The Project Site has a long history of heavy industrial and agricultural use. The Site was in agriculture (hay or livestock production) until Simpson Lumber Company constructed an industrial mill site in the late 1940's or early 1950's. The Site has been modified many times with the addition of warehouses and lumber storage racks. Between 1988 and 1993, the storage racks were removed. The fields have since been graded and are currently used for agriculture. The existing greenhouses are used to grow flowers, while the fields have been used for both flowers and mixed row crops.

Approximately seven acres of hoop structures currently existing on the Project Site, and an additional 85 acres of hoop structures are located on adjoining parcels to the north. The Project proposes hoop structures, a water storage tank, and ancillary support buildings that will be consistent with the existing visual character of the Site and surrounding parcels. In addition, the new structures will be obscured from view from off-site residences and motorists on both Foster Avenue and 27th Street due to significant existing perimeter vegetation on adjoining parcels.

Therefore, the Project would not substantially degrade the existing visual character or quality of the Site and its surroundings, and would result in a ***less than significant impact***.

- d. New lighting at the Site will consist of task and operational lighting in the ancillary support structures/buildings (administration buildings), artificial lighting in a portion of the hoop structures, and outdoor lighting for security purposes.

Ancillary structures/facilities (i.e., administration building, propagation and office building, utility building) would have operational and task lighting within the buildings which will not be visible outside the building due to window coverings and limited operating hours (generally daylight hours, from sunrise to sunset). Onsite staff would be responsible each evening for ensuring all lights are turned off or blacked out prior to sunset each day.

Outdoor lighting at the Site will be limited to perimeter lighting installed for security purposes, and lighting in the parking and loading areas. All new outdoor lighting will be the minimum lumens required for security purposes, directed downward, and shielded to prevent lighting spillover onto adjacent properties.

The majority of the hoop structures (~750,000 square feet; 17.2 acres) will be outdoor light-deprivation, and will not employ artificial lighting. The remainder of the hoop structures (~250,000 square feet; 5.7 acres) will be mixed-light, and include artificial lighting. For the hoop structures that will employ mixed-light cultivation, strict adherence to International Dark Sky Association standards for Lighting Zone 0 and Lighting Zone 1 is a requirement of the County Commercial Medical Marijuana Land Use Ordinance.. Light and glare will be controlled using blackout plastic/fabric to cover the hoop structures and prevent light from escaping. Lighting will be designed to regulate light spillage onto neighboring properties resulting from backlight, uplight, or glare, and light will not escape at a level that is visible from neighboring properties between sunset and sunrise.

The project would comply with all CMMLUO performance standards for lighting, and new structures, including lighting plans, would be subject to approval by the Humboldt County Building Department. In addition, the Project has been designed consistent with, and will conform to CDFA's regulations (Cal. Code Regs. tit.3, § 8000 et seq.), which contain protections for environmental resources. With respect to aesthetics CDFA's regulations require all outdoor lighting used for security purposes shall be shielded and downward facing (§8304(c)); and mixed-light license types of all tiers and sizes shall ensure that lights used for cultivation are shielded from sunset to sunrise to avoid nighttime glare (§8304(g)).

Thus, the Project will not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area and a ***less than significant impact*** would occur.

II. AGRICULTURE AND FORESTRY RESOURCES.

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepare the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

Potentially Significant Impact Less Than Significant with Mitigation Incorporated Less Than Significant Impact No Impact

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non- agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

- a. Humboldt County is not included in the Farmland Mapping and Monitoring Program (https://www.conservation.ca.gov/dlrp/fmmp/Pages/county_info.aspx; accessed October 2, 2020). According to the Humboldt County Web GIS, the entire Project Site (approximately 38 acres) is mapped as prime agricultural soils, however the site has effectively been converted previously through the adoption of the Heavy Industrial (MH) zone district. All of the Project-related uses (e.g., outdoor light-deprivation and mixed-light cultivation, accessory buildings, access roads, parking) that will occur on the prime agricultural soils are agricultural uses or agricultural related uses. Therefore, the Project would not convert any existing Farmland to non-agricultural uses, and **no impact** would occur.
- b. The Project Site is zoned Heavy Industrial with a Qualified Combining Zone (MH-Q). Outdoor light-deprivation and mixed-light cultivation are allowed uses with a Use Permit in the MH zone pursuant to Section 55.4.8.2.1.2 of the CMMLUO. According to the County Web GIS mapping, there is no Williamson Act contract applicable to the Project Site. Thus, the Project would not conflict with existing zoning for agricultural use or a Williamson Act contract, and therefore, **no impact** would occur relative to existing zoning for agricultural use.
- c.d. The Project Site is not identified as forest land (as defined in PRC section 12220[g]) or timberland (as defined by PRC section 4526), and is not zoned Timberland Production (as defined by Government Code section 51104[g]). Therefore, the Project would not result in the conversion of forest land and would not conflict with forest land, timberland, or Timberland Production zoning, and **no impact** would occur.
- e. The Project would not produce significant growth in the area that would result in the conversion of farmland or forest land. Growth inducing impacts are generally caused by projects that have an effect on economic growth, population growth, or land development. The Project is anticipated to require a maximum of 116 employees during the peak harvest season. It is anticipated that these employees (or the majority of them) would be from within Humboldt County. Therefore, the Project is not anticipated to result in the need for new residential dwelling units, and thus, would not indirectly convert farmland to non-agricultural land or forest land to non-forest land. **No impact** would occur.

III. AIR QUALITY.

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

a.b. The project is located in Humboldt County, which is in the North Coast Air Basin, which includes all of Humboldt, Del Norte, Trinity, and Mendocino counties, as well as a portion of Sonoma County. The North Coast Unified Air Quality Management District (“NCUAQMD”) is one of three air districts responsible for overseeing compliance with State and Federal laws, regulations, and programs within the North Coast Air Basin. NCUAQMD includes Del Norte, Humboldt, and Trinity Counties. Ambient air quality standards have been established at both the State and federal level. The area is listed as "attainment" or "unclassified" for all the federal and state ambient air quality standards except for the state 24-hour particulate (PM10) standard in Humboldt County only. The District has not exceeded the federal annual standard for particulate matter during the last five-year period.

In 1995, NCUAQMD provided a study to identify the major contributors of PM10, which were summarized in the Particulate Matter PM10 Attainment Plan. PM10 emissions in Humboldt County are generated by a variety of sources and the PM10 Attainment Plan includes control strategies that are intended to achieve attainment of the state’s air quality standard. Control strategies include transportation control measures such as encouraging the use of public transit and replacing the diesel-powered bus fleet with natural gas fueled models, encouraging car-pooling and bicycle commuting, removal or repair of vehicles with inefficient emission control systems, and traffic flow improvements that reduce idling and VMT. Land use control measures encourage mixed use or more

dense development. The PM10 Attainment Plan also includes measures that limit residential burning as well as various measures to encourage the installation of EPA certified woodstoves.

In order to assess the Project’s potential for air quality impacts, Illingworth & Rodkin, Inc., (“I&R”) a professional air quality consulting firm, prepared a comprehensive air quality emissions evaluation. I&R used the California Emissions Estimator Model (CalEEMod) Version 2016.3.2 to estimate emissions from on-site construction and operational activities, including vehicle trips. The resulting emissions were compared against the NCUAQMD’s published emissions thresholds². See resulting emissions comparison summaries in Table A and B, below:

**TABLE A
CONSTRUCTION PERIOD EMISSIONS**

Scenario	ROG	NOx	PM10	PM2.5
2021 Construction Emissions (tons)	1.34	4.03	0.21	0.18
BACT Threshold (tons per year)	40	40	15	10
Exceed Threshold?	No	No	No	No
2021 Construction Emissions (pounds)	8.91	26.76	1.41	1.20
BACT Threshold (pounds per day)	50	50	80	50
Exceed Threshold?	No	No	No	No

**TABLE B
OPERATIONAL PERIOD EMISSIONS**

Scenario	ROG	NOx	PM10	PM2.5
2022 Operational Emissions (tons)	0.5	0.3	0.2	0.1
BACT Threshold (tons per year)	40	40	15	10
Exceed Threshold?	No	No	No	No
2022 Operational Emissions (pounds)	3.4	4.2	2.5	0.8
BACT Threshold (pounds per day)	50	50	80	50
Exceed Threshold?	No	No	No	No

As summarized in Tables A and B, I&R’s air quality modeling indicates that the Project’s potential emissions during both the construction and operational phases will be well below the NCUAQMD’s significance thresholds. In addition, Project activities will comply with the dust control regulations contained in NCUAQMD Rule 104, Section D.2. Pursuant to Rule 104, the handling, transporting, or open storage of materials in a manner which allows or may allow unnecessary amounts of particulate matter to become airborne is

² The NCUAQMD has not formally adopted CEQA significance thresholds, so recommends using the Best Available Control Technology (BACT) emission rate thresholds for stationary sources as defined and listed in the NCUAQMD Regulation I, Rule 110, New Source Review And Prevention of Significant Deterioration, Section E (Requirements), Item 1 (Best Available Control Technology [BACT]).

not permitted. Reasonable precautions must be taken to prevent particulate matter from becoming airborne, including, but not limited to: (1) covering open bodied trucks when used for transporting materials likely to give rise to airborne dust; (2) conducting agricultural practices in such a manner as to minimize the creation of airborne dust; and (3) the use of water for control of dust in construction operations, the grading of roads, and the clearing of land.

Given that Project emissions will be below relative significance thresholds, and with implementation of dust control measures required by the NCUAQMD, the Project will not conflict with implementation of an air quality plan, air quality standard, or non-attainment Pollutant, and impacts would be ***less than significant***.

- c. A sensitive receptor is a person who is particularly susceptible to health effects due to exposure to an air contaminant. Land uses considered sensitive receptors include residences, schools, playgrounds, childcare centers, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. With the exception of scattered rural residential, there are no sensitive land uses within the vicinity. The surrounding vicinity is sparsely populated with approximately five residences located within 1,000 feet of the Project Site. As discussed in the air quality impact analysis section above, the Project would not produce significant quantities of criteria pollutants during construction or operation. As a result, the Project would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be ***less than significant***.
- d. In general, odor regulations fall into two categories: (1) they are covered through a general nuisance regulation or (2) they are covered under a separate air district rule. California Health and Safety Code section 41700 prohibits discharge of air contaminants, including odors, that cause nuisance or annoyance to the public; however, odors related to agricultural operations are exempt under Health and Safety Code section 41704. Similarly, the growing and harvesting of cannabis crops is considered an agricultural operation, and therefore exempt from NCUAQMD Rule 104(1.1).

The Project has the potential to emit odors during the construction and operational phases. During construction, the project would generate localized emissions of diesel exhaust from conventional construction equipment and transport trucks. It is possible that these emissions may be noticeable from time to time by adjacent receptors; however, they would be localized to the work area, short-term, and would not include any sources of significant odors likely to adversely affect a substantial number of people off-site.

During operation, the cultivation of cannabis is a potential source of odors. The odor of cannabis is described by some as an offensive skunk-like smell. This odor is produced by terpenes, which are volatile, unsaturated hydrocarbons found in the oils of various plants. Naturally, these oils are most present late in the budding cycle and at harvest. Without proper controls, greenhouse (hoop structure) cultivation can lead to a buildup of these odors because of reduced ventilation, heat and humidity conditions.

Potential odors generated during cultivation activities within the hoop structures will be controlled using mechanical means, including fans that direct airflow through the hoop structures to a carbon filtration unit. Carbon filtration is an effective technology for reducing VOC emissions from cannabis cultivation activities. Carbon filters work by an absorption process where the porous surfaces chemically attract the VOC contaminants present in the exhaust air stream. In addition to the fact that the facility will employ mechanical odor control measures, the number of nearby receptors is limited. The Project Site is a component of a large private land holding (350+ acres) of the Project applicant that is currently used as a cut flower and general agricultural operation. The predominant land uses in the vicinity of the Project include additional land holdings of the Project applicant, as well as mixed commercial, agricultural and scattered rural residential uses. The surrounding vicinity is sparsely populated with approximately five residences located within 1,000 feet of the Project Site. The closest offsite residences are two homes located on a single parcel off of 27th Street approximately 200 feet to the north and northeast of the Site. Beyond this single parcel, the next closest homes are located >500 feet to the east of the Project Site.

Given the limited number of potential receptors, separation distance, and control measures to be implemented through the Conditional Use Permit, the Project is not anticipated to create objectionable odors affecting a substantial number of people and impacts would be less than significant.

IV. BIOLOGICAL RESOURCES.

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

1. SHN conducted a Biological Resources Assessment to assess the potential presence of any candidate, sensitive, or special status species within the Project area. The site was visited in December 2018 to assess available habitat for special-status species that were reported in the vicinity, and seasonally appropriate surveys occurred on May 2 and July 19, 2019.

Plant Species

Based on a review for special status plant species, 72 special status plant species have been reported from the region consisting of the Project area's quadrangle and surrounding quadrangles. Of the special status plant species reported in the region, 66 plant species are considered to have a low potential to occur within the Project area and 6 species have a moderate or higher potential to occur within the Project area. Species that have a moderate or higher potential to occur within the Project area are described below:

- *Hosackia gracilis* is a perennial herb in the Fabaceae family. It is neither State nor federally listed, but has a CRPR of 4.2 and a heritage rank of G4/S3. Its elevation range is reported from 0 to 700 meters above sea level. Within its range state-wide, its blooming period is reported as March through July. This species is reported from wetlands, roadsides, and a variety of habitats from coastal scrub to coniferous forests. Although suitable habitat may exist within the Project area for this species, it was not detected.
- *Lathyrus palustris* is a perennial herb in the Fabaceae family. It is neither State nor federally listed, but has a CRPR of 2B.2 and a heritage rank of G5/S2. Its elevation range is reported from 2 to 140 meters above sea level. Within its range state-wide, its blooming period is reported as March through August. This species is reported from bogs, fens, lower montane coniferous forest, marsh, swamp, coastal prairie, and coastal scrub. Although suitable habitat may exist within the study area for this species, it was not detected.
- *Montia howellii* is an annual herb in the Montiaceae family. It is neither State nor federally listed, but has a CRPR of 2B.2 and a heritage rank of G3G4/S2. Its elevation range is reported from 0 to 835 meters above sea level. Within its range state-wide, its blooming period is reported as March through May. This species is reported from meadows and seeps, north coast coniferous forests, vernal pools, vernal mesic sites, and sometimes roadsides. Although suitable habitat may exist within the study area for this species, it was not detected.
- *Sidalcea malachroides* is a perennial herb in the Malvaceae family. It is neither State nor federally listed, but has a CRPR of 4.2 and a heritage rank of G3/S3. Its elevation range is reported from 0 to 730 meters above sea level. Within its range state-wide, its blooming period is reported as March through August. This species is reported from woodlands, clearings near the coast, and often in disturbed areas.

Although suitable habitat may exist within the study area for this species, it was not detected.

- *Sidalcea malviflora* ssp. *patula* is a perennial herb in the Malvaceae family. It is neither State nor federally listed, but has a CRPR of 1B.2 and a heritage rank of G5T2/S2. Its elevation range is reported from 5 to 1,255 meters above sea level. Within its range state-wide, its blooming period is reported as May through August. This species is reported from coastal bluff scrub, coastal prairie, roadcuts and north coast coniferous forests. Although suitable habitat may exist within the study area for this species, it was not detected.
- *Sidalcea oregana* ssp. *eximia* is a perennial herb in the Malvaceae family. It is neither State nor federally listed, but has a CRPR of 1B.2 and a heritage rank of G5T1/S1. Its elevation range is reported from 5 to 1,805 meters above sea level. Within its range state-wide, its blooming period is reported as June through August. This species is reported from meadows, seeps, low montane conifer forests, and in gravelly soil. Although suitable habitat may exist within the study area for this species, it was not detected.

Animal Species

Based on a review of special status animal species, 66 special status animal species have been reported with the potential to occur in the Project region. Of the special status animal species potentially occurring in the region, 51 animal species are considered to have a no or low potential to occur within the Project area and 15 species have a moderate or higher potential. Species with a moderate or high potential for occurrence within the Project area are described below:

- The northern red-legged frog (*Rana aurora*) is an amphibian in the Ranidae family. Reported habitats include Klamath and north coast flowing waters and riparian forests, usually near dense riparian cover. It is generally found near permanent water, but is sometimes found far from water in damp woods and meadows during the non-breeding season (May to November). Status: Federal None, State None, Species of Special Concern, Global rank Apparently Secure, State rank Vulnerable. Suitable dispersal habitat for this species exists within the study area and potential breeding habitat exists in the drainage along the western boundary of the study area, although it was not detected.
- The Cooper's hawk (*Accipiter cooperii*) occurs in woodlands, riparian forest, chiefly of open, interrupted, or marginal type. Nest sites mainly in riparian growths of deciduous trees, as in canyon bottoms on river floodplains; also, live oaks. This species builds stick platform nests lined with bark in crotches of riparian deciduous trees and second-growth conifers near streams. Status: Federal None, State None, Watchlist, Global rank Secure, State rank Apparently Secure. Foraging habitat for this species exists in the eastern half of the study area and adjacent to

the study area. Potential foraging habitat exists for this species within the study area, nesting habitat exists on adjacent property, although it was not detected.

- The sharp-shinned hawk (*Accipiter striatus*) can be found in ponderosa pine, black oak, riparian deciduous, mixed conifer, Jeffrey pine habitats, and prefers riparian areas. North-facing slopes with plucking perches are critical requirements. Nests are usually within 275 feet of water. Status: Federal None, State None, Watchlist, Global rank Secure, State rank Apparently Secure. Foraging habitat for this species exists in the study area and adjacent to the study area, although it was not detected.
- The great egret (*Ardea alba*) is a colonial nester in large trees. Rookery sites are located near marshes, tidflats, irrigated pastures, and margins of rivers and lakes. This species is most often found foraging around water, including wet fields and grassy meadows near water. Status: Federal None, State None, Sensitive, Global rank Secure, State rank Apparently Secure. Potential foraging habitat exists for this species within the study area during the wet season, although it was not detected.
- The great blue heron (*Ardea herodias*) is a colonial nester in tall trees, cliffsides, and sequestered spots on marshes. Rookery sites in close proximity to foraging areas: marshes, lake margins, tide-flats, rivers and streams, wet meadows. This species is most often found foraging near or in water, or in grassy fields near water. Status: Federal None, State None, Sensitive, Global rank Secure, State rank Apparently Secure. Potential foraging habitat exists for this species within the study area during the wet season, although it was not detected.
- The short-eared owl (*Asio flammeus*) lives in large, open areas with low vegetation including grasslands, savannah, marshes, and agricultural areas. They can be seen during the day and make their nests on the ground. Status: Federal None, State None, Species of Special Concern, Global rank Secure, State rank Vulnerable. Suitable foraging and potential nesting habitat exist for this species within the study area, although it was not detected.
- The Vaux's swift (*Chaetura vauxi*) typically nests in tree cavities and forages in the air over streams and standing water that support invertebrates. Status: Federal None, State None, Species of Special Concern, Global rank Secure, State rank Imperiled/Vulnerable. Potential aerial foraging habitat exists within the study area for this species, although it was not detected.
- The northern harrier (*Circus cyaneus*) is most common in large undisturbed tracts of wetlands and grasslands with low, thick vegetation during the breeding season. In winter, they use a wider range of habitat types with low vegetation including sand dunes, deserts, pastures, and croplands. Status: Federal None, State None, Species of Special Concern, Global rank Secure, State rank Vulnerable. Winter foraging habitat exists for this species within the study area, although it was not detected.

- The snowy egret (*Egretta thula*) nests in colonies in isolated areas, often near water. They forage in marshes and estuaries, grassy ponds, pools, and wet fields. Status: Federal None, State None, Global rank Secure, State rank Apparently Secure. Potential foraging habitat exists for this species within the study area during the wet season, although it was not detected.
- The white-tailed kite (*Elanus leucurus*) can be found in foothills, valleys, and river bottomlands and marshes. They typically use open grasslands for foraging and nest in densely-topped trees. Status: Federal None, State None, Fully Protected, Global rank Secure, State rank Apparently Secure/Vulnerable. Potential foraging habitat exists for this species in the study area and nesting habitat adjacent to the study area, although it was not detected.
- The Merlin (*Falco columbarius*) nests near forest openings near water and forages typically for smaller birds in the air in open areas. Status: Federal None, State None, Watch List, Global rank Secure, State rank Sensitive/Apparently Secure. Foraging habitat exists for this species within the study area, although it was not detected.
- The American peregrine falcon (*Falco peregrinus anatum*) occupies wetlands, lakes, rivers, or other water; on cliffs, banks, dunes, and human-made structures. Nest consists of a scrape or a depression or ledge in an open site. Status: Federal Delisted, State Delisted, Fully Protected, Global rank Apparently Secure, State rank Vulnerable/Apparently Secure. Potential foraging habitat exists within the study area for this species, although it was not detected.
- The Bryant's savannah sparrow (*Passerculus sandwichensis alaudinus*) live in grasslands, meadows, and cultivated fields, as well as coastal scrub and estuaries. Status: Federal None, State None, Species of Special Concern, Global rank imperiled/sensitive, State rank imperiled/sensitive. Foraging and nesting habitat exists for this species within the study area, although it was not detected.
- The western bumble bee (*Bombus occidentalis*) is an insect in the Apidae family. This species was once common and widespread, but has declined precipitously from central California to southern British Columbia, perhaps from disease. Status: Federal None, State None, Sensitive, Global Rank Imperiled/Vulnerable, State Rank Critically Imperiled. There is suitable foraging and nesting habitat available for this species within the study area, although it was not detected.
- The obscure bumblebee (*Bombus caliginosus*) lives in along coastal areas of the western states in underground burrows or above ground in abandoned bird nests. Status: Federal None, State None, Vulnerable, Global Rank Apparently Secure, State Rank Critically Imperiled/Imperiled. There is suitable foraging and nesting habitat available for this species within the study area, although it was not detected.

The Site is heavily disturbed and actively managed for agricultural production. During the field surveys conducted as part of the SHN Biological Resources Assessment, no special status plant or animal species were documented within the Project area. However, due to the potential presence of nesting birds at the Site, the following mitigation is recommended:

Mitigation Measure BR-1: Preconstruction Bird Surveys

Project-related vegetation management should occur outside the bird nesting season, (February 28 through September 1). If project-related brush clearing must occur during the breeding season, a preconstruction nesting-bird survey shall be conducted by a qualified biologist no more than two weeks prior to Project activities. If active nests are found, a no-disturbance buffer zone shall be established of a minimum of 250 feet.. Within this buffer zone, no construction shall take place until September 1 or until the biologist determines that the nest is no longer active.

Level of Significance After Mitigation:

Implementation of Mitigation Measure BR-1 would reduce potential impacts to candidate, sensitive, or special status species to ***less than significant***.

- b. Sensitive natural communities are habitats that are generally defined by vegetation type and geographical location and are increasingly restricted in abundance and distribution. Recognition of natural communities is an ecosystem-based approach to maintaining biodiversity in California. High quality occurrences of natural communities with heritage ranks of three (3) or lower are considered by CDFW to be significant resources and fall under the CEQA guidelines for addressing impacts. No sensitive natural communities were identified by SHN within the Project area. Thus, the Project will have ***no impact*** on any sensitive natural community identified in local or regional plans, policies, or regulations.

- c. A Project-specific wetland delineation conducted by SHN did not identify any wetlands within the Project area, but did identify a man-made roadside drainage ditch approximately 5,100 square feet in size containing wetland indicators located along the existing access road at the southwest border of the Project site. The drainage ditch is classified as a Class IV watercourse (*all other man-made irrigation canals*) under the State Water Resources Control Board (SWRCB) Order WQ 2019-0001-DWQ),, with no prescribed setback requirements.

The drainage ditch is located outside of the Project boundary, and will be conserved and not disrupted by Project activities (with exception of routine maintenance of the ditch, consistent with current practice). In addition, the Project will be subject to the water quality requirements of WQ 2019-0001-DWQ and the County’s CMMLUO performance standards. This includes requiring that fertilizers and pesticides/herbicides be applied consistent with product labeling and managed to ensure that they will not enter or be

released into surface or groundwater. As a result, the Project will not physically interfere with the potentially jurisdictional drainage ditch located near the Project boundary. Nevertheless, SHN recommends the following mitigation measure to ensure that no impact to potentially jurisdictional waters occurs:

Mitigation Measure BR-2: Protection of Drainage Ditches

Use standard BMPs during ground disturbance activities and remove construction debris and waste from and up to 100 feet around drainage ditches.

Level of Significance After Mitigation:

Implementation of Mitigation Measures BR-2 would reduce potential impacts to federally protected wetlands and other waters to ***less than significant***.

- d. SHN found that there are no significant wildlife movement corridors within the Project area, and Project activities will not impact or restrict existing drainage ditches and swales, maintaining general movement corridors in the Project vicinity. As a result, the Project will not interfere substantially with movement of native resident or migratory wildlife species or with established native resident or migratory wild-life corridors and a ***less than significant impact*** would occur.
- e. The Project does not conflict with local policies or ordinances protecting biological resources. The Project will not impact riparian or wetlands habitats or involve the removal of trees. As a result, the Project will not conflict with any local policies or ordinances protecting biological resources, and ***no impact*** would occur.
- f. According to the U.S. Fish & Wildlife Service Environmental Conservation Online System, the Project Site is not located within the boundaries of a Habitat Conservation Plan. Habitat Conservation Plans in Humboldt County primarily apply to forest lands and include: 1) Green Diamond Resource Company California Timberlands & Northern Spotted Owl (formerly Simpson Timber Company); 2) Humboldt Redwood Company (formerly Pacific Lumber, Headwaters); and 3) Regli Estates.

According to the California Department of Fish & Wildlife website, the Project Site is not located in the boundaries of a Natural Community Conservation Plan. Existing Conservation plans for Humboldt County include the Green Diamond and Humboldt Redwoods Company (previously Pacific Lumber Company) Habitat Conservation Plans.

In addition, to being located outside of the boundaries of a habitat conservation plan or natural community conservation plan, the Project is located on private property, does not involve the removal of trees, and includes mitigation measures to further reduce potential impacts to special-status species and habitats. Therefore, the Project will not conflict with any local policies or ordinances protecting biological resources or conflict

with the provisions of an adopted Habitat Conservation Plan, Natural Community Plan, or other approved plan applicable to the Project area, and **no impact** would occur.

V. CULTURAL RESOURCES.

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

a-c. A Cultural Resources Investigation was prepared for the Project by Archaeological Research and Supply Company in May 2018 (updated June 2020). The investigation included a records search through the California Historical Resources Information System's regional Northwest Center (NWIC), Native American Heritage Commission (NAHC) inquiry, coordination with local tribes, and pedestrian survey of the Site. In addition, representatives of the Blue Lake Rancheria, Bear River Band of Rohnerville Rancheria, and the Wiyot Tribe conducted a field visit with Archaeological Research and Supply Company in May 2018.

Consultation with Native American tribes traditionally and culturally associated with the project area has been an ongoing part of the process. Specifically, an invitation for Tribal Consultation pursuant to AB 52 was sent to the Bear River Band of Rohnerville Rancheria, Blue Lake Rancheria, the Wiyot Tribe, and Cher-Ae Heights Indian Community of the Trinidad Rancheria that were all identified as potentially being affected by the NAHC on July 29, 2020. The Tribes did not accept the request.

No prehistoric resources were identified within the Project area, but one 1920-50s area historic trash scatter was identified. The cultural resources study concludes that the Project will not impact significant historic or prehistoric archaeological resources so long as earth disturbances do not extend more than 8 feet below the existing ground surface and a heightened inadvertent discovery protocol is implemented.

The Project does not propose to excavate greater than 8 feet in depth. To address the unlikely event that buried cultural resource deposits are discovered during Project

activities, (and consistent with §8304(d) of CDFA regulations) the following mitigation measure is proposed relating to inadvertent discovery procedures:

Mitigation Measure CR-1: Inadvertent Discovery Protocol

If suspected cultural resources, such as lithic materials or ground stone, historic debris, building foundations, or bone are discovered during Project activities, work shall be stopped within 100 feet of the discovery. Contact will be made to the County, a professional archaeologist and representatives from the Blue Lake Rancheria, Bear River Band of Rohnerville Rancheria, and Wiyot Tribe. The professional historic resource consultant, Tribes and County officials will coordinate provide an assessment of the find and determine the significance and recommend next steps.

If human remains are discovered during Project activities, work will stop at the discovery location, within 100 feet, and any nearby area reasonably suspected to overlie adjacent to human remains (Public Resources Code, Section 7050.5). The Humboldt County coroner will be contacted to determine if the cause of death must be investigated. If the coroner determines that the remains are of Native American origin, it is necessary to comply with state laws relating to the disposition of Native American burials, which fall within the jurisdiction of the NAHC (Public Resources Code, Section 5097). The coroner will contact the NAHC. The descendants or most likely descendants of the deceased will be contacted, and work will not resume until they have made a recommendation to the landowner or the person responsible for the excavation work for means of treatment and disposition, with appropriate dignity, of the human remains and any associated grave goods, as provided in Public Resources Code, Section 5097.98.

Level of Significance After Mitigation:

Potential impacts associated with the disturbance of cultural resources that may be encountered during Project activities would be **less than significant** with implementation of Mitigation Measure CR-1.

VI. ENERGY.

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

a.b. The Project involves only cultivation, with processing to occur at an offsite location. The Project will utilize energy resources primarily through use of artificial lighting in a portion of the hoop structures, and to a lesser extent, task and operational lighting in the ancillary support structures / buildings (administration buildings), outdoor lighting for security purposes, natural gas use in boilers, and fuel use in Project vehicles. The property is serviced by an existing Pacific Gas and Electric (PG&E) service line, and no new or expanded energy facilities are needed in connection with the Project. The Project includes installation and operation of three natural gas boilers that will be used to provide temperature control within the hoop structures. The Site is serviced by an existing natural gas line, and no new or expanded gas facilities are needed in connection with the Project. No generator is anticipated.

Approximately 75% of the hoop structures are proposed as outdoor light-deprivation, and will require no artificial lighting. The remainder of the hoop structures will utilize a combination of natural and artificial lighting to improve cultivation yields. The outdoor light-deprivation component of the Project is anticipated to be classified as Mixed-Light Tier 1, and the mixed-light component of the Project is anticipated to be classified as Mixed-Light Tier 2 for CDFA licensing purposes. Energy use associated with the operation of the mixed light hoop-style greenhouses is conservatively estimated at 27 kilowatt hours (kWh) per square foot of canopy using the results of a 2018 energy use survey conducted by the Northwest Power and Conservation Council. Thus, the annual energy consumption from the mixed light hoop houses proposed by the project is estimated at 6,750,000 kWh (or 6,750 MWh).

With respect to new buildings proposed for the Site, they will be subject to compliance with the California Green Building Standards Code (CALGreen Code), which is part of the California Building Standards Code under Title 24, Part 11. The CALGreen Code encourages sustainable construction standards that involve planning/design, energy efficiency, water efficiency resource efficiency, and environmental quality. These green

building standard codes are mandatory statewide and are applicable to residential and non-residential developments. The most recent CALGreen Code (2019 California Building Standard Code) was effective as of January 1, 2020. The California Building Energy Efficiency Standards (California Energy Code) is under Title 24, Part 6 and is overseen by the California Energy Commission (CEC). This code includes design requirements to conserve energy in new residential and non-residential developments. This Energy Code is enforced and verified by local agencies during the planning and building permit process. The current energy efficiency standards (2019 Energy Code) replaced the 2016 Energy Code as of January 1, 2020. Under the 2019 standards for nonresidential developments, it is predicted that new buildings will use 30 percent less energy due to lighting upgrades. For the Project, all new outdoor lighting will be the minimum lumens required for security purposes.

The Project's energy usage was analyzed by Illingworth & Rodkin, Inc., ("I&R") a professional air quality consulting firm, for potential air quality impacts. I&R's analysis demonstrates that the Project's energy usage will not have a significant impact with respect air quality criteria pollutants or greenhouse gas emissions. The Project will only utilize energy as needed for operational demands, and will not result in wasteful, inefficient, or unnecessary consumption. In addition, no new or expanded energy facilities are anticipated to be needed in connection with the Project. Therefore, a ***less than significant impact*** would occur with respect to energy.

VII. GEOLOGY AND SOILS.

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- a.i.,ii. According to the Humboldt County GIS, the Project Site is not located within an Alquist-Priolo fault hazard zone; however, earthquakes on active faults in the region have the capacity to produce a range of ground shaking intensities in the Project area. Ground shaking may affect areas hundreds of miles distant from an earthquake's epicenter. Some degree of ground motion resulting from seismic activity in the region could occur during the long-term operation of the Project; however, all new buildings will be required to meet the requirements of California Building Code, which addresses seismic requirements. The State of California provides minimum standards for building design through the California Building Code (CBC; California Code of Regulations Title 24). Where no other building codes apply, CBC Chapter 29 regulates excavation, foundations, and retaining walls. The CBC applies to building design and construction in the State and is based on the federal Uniform Building Code (UBC) used widely throughout the country. The CBC has been modified for California conditions with numerous more detailed and/or more stringent regulations. Specific minimum seismic safety and structural design requirements are set forth in CBC Chapter 16. The Code identifies seismic factors that must be considered in structural design. Any structures proposed as part of the project are required to be constructed in accordance with the California Building Code and comply with County building permit requirements. Therefore, ***a less than significant impact*** would occur relating to earthquake faults and strong seismic ground shaking.
- a.iii. Liquefaction is a phenomenon whereby unconsolidated and/or near-saturated soils lose cohesion and are converted to a fluid state as a result of severe vibratory motion. The relatively rapid loss of soil shear strength during strong earthquake shaking results in temporary, fluid-like behavior of the soil. Soil liquefaction causes ground failure that can damage roads, pipelines, underground cables and buildings with shallow foundations. According the Humboldt County GIS, the Project Site is in an area subject to potential liquefaction. The County's Building Regulations address potential soil stability hazards by requiring soils reports and site-specific engineering, as necessary, prior to issuance of building permits. In addition, the California Building Code provides soil classification guidelines for expansive soils. Proposed structures to be located on expansive soils, require special design considerations prior to permit. Based on conformance to County and state building requirements, the Project would not expose people or structures to potential substantial adverse effects related to seismic-related ground failure, including liquefaction, and a ***less than significant impact*** would occur.
- a.iv. According to the Humboldt County Web GIS system, no historic landslides are designated in or near the Project area. The Project parcels and immediately surrounding area are designated with a stability rating of 0 (relatively stable). Therefore, the Project will not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides, and ***no impact*** will occur.

- b. The Project does not involve the removal of any trees within the Project area, or vegetation outside of the Project footprint that could result in erosion. The Project grading and site plans were developed by professional engineering firm Wallace Group, who also prepared a technical memorandum addressing storm water management, including storm water detention basin sizing and design.

The Project will maintain coverage under SWRCB Order WQ 2019-0001-DWQ, which prescribes Best Practicable Treatment or Control measures to control runoff and erosion, including monitoring of erosion control measures during and after design storm events, and repair or replacement, as needed, of ineffective erosion control measures immediately.

Given the design elements of the Project, as well as implementation of BMPs and BPTC measures, the Project is not expected to result in significant soil erosion or loss of topsoil during the construction or operational phases of the Project. Therefore, the Project will not result in substantial soil erosion or the loss of topsoil, and a ***less than significant impact*** would occur.

- c. According to the Humboldt County Web GIS system, no historic landslides are designated in or near the Project area. The Project parcels and immediately surrounding area are designated with a stability rating of 0 (relatively stable). The Project Site is essentially flat, with little topographic variation. In addition, new structures will be required to comply with the County's Building Regulations and California Building Code which provide special considerations and requirements to ensure stability of soils. Therefore, the Project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and a ***less than significant impact*** would occur.
- d. Expansive soils possess a "shrink-swell" characteristic. Shrink/swell potential is the relative change in volume to be expected with changes in moisture content, that is, the extent to which the soil shrinks as it dries out or swells when it gets wet. No expansive soils have been identified on the Project Site and ***no impact*** from expansive soils is expected.
- e. The Project area will be served by a new on-site wastewater treatment system to be reviewed and approved by the County Department of Environmental Health. The system will be located on the eastern boundary of the Project area, as shown on the proposed Site plan. The system was designed by SHN, who conducted a septic suitability assessment and determined that the soils at the Project Site are capable of supporting a new wastewater treatment system of adequate size for the Project. Therefore, a ***less than significant*** relating to use of septic tanks would occur.
- f. No unique paleontological or geologic features are known to exist on the Project Site. However, a mitigation measure is proposed to address the unlikely event that buried paleontological resources are discovered during Project activities.

Mitigation Measure GEO-1: Inadvertent Discovery Protocol

In the event that paleontological resources are discovered, work shall be stopped within 100 feet of the discovery and a qualified paleontologist shall be notified. The paleontologist shall document the discovery as needed, evaluate the potential resource, and assess the significance of the find under the criteria set forth in State CEQA Guidelines Section 15064.5. If fossilized materials are discovered during construction, excavations within 100 feet of the find shall be temporarily halted or diverted until the discovery is examined by a qualified paleontologist. The paleontologist shall notify the appropriate agency to determine procedures that would be followed before construction is allowed to resume at the location of the find.

Level of Significance After Mitigation:

Potential impacts associated with the disturbance of paleontological resources that may be encountered during Project activities would be ***less than significant*** with implementation of Mitigation Measure GEO-1.

VIII. GREENHOUSE GAS EMISSIONS.

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

- a,b. The NCUAQMD does not have established significance thresholds for evaluating the impacts of a project’s greenhouse gas (GHG) emissions. According to the NCUAQMD website, in 2011, the NCUAQMD adopted Rule 111 (Federal Permitting Requirements for Sources of Greenhouse Gases) into the District rules, to establish a threshold above which New Source Review and federal Title V permitting applies, and to establish federally enforceable limits on potential to emit greenhouse gases for stationary sources; however, according to the NCUAQMD, these are considered requirements for stationary sources and should not be used as a threshold of significance for CEQA evaluations.

The Project could generate both direct and indirect GHG emissions. Direct GHG emissions include emissions that will primarily result from stationary (boilers) and mobile (vehicle/equipment) sources. Indirect GHG emissions are generated by electricity consumption and waste generation. Indirect emissions resulting from the use of artificial lighting within a portion of the hoop structures will be the primary contributor of greenhouse gas emissions from the Project.

Approximately 75% of the hoop structures are proposed as outdoor light-deprivation, and will require no artificial lighting. The remainder of the hoop structures will utilize a combination of natural and artificial lighting to improve cultivation yields. Energy use associated with the operation of the mixed light hoop-style greenhouses is conservatively estimated at 27 kilowatt hours (kWh) per square foot of canopy using the results of a 2018 energy use survey conducted by the Northwest Power and Conservation Council. Thus, the annual energy consumption from the mixed light hoop houses proposed by the project is estimated at 6,750,000 kWh (or 6,750 MWh).

As noted above, neither the NCUAQMD nor Humboldt County has established thresholds of significance for evaluating a project’s GHG emissions. Since there are no applicable

thresholds for projects in the Air District or Humboldt County, the NCUAQMD recommends the use of thresholds and guidance provided by other air districts in the State such as the Bay Area Air Quality Management District (BAAQMD). The BAAQMD has developed project screening criteria to provide lead agencies and project applicants with a conservative indication of whether a project could result in potentially significant impacts related to greenhouse gas emissions. Projects below the applicable screening criteria would not exceed the 1,100 metric tons (MT) of CO₂e/yr GHG threshold established by the BAAQMD for land use projects, other than permitted stationary sources. The BAAQMD has not established a threshold of significance for this type of project as it is agricultural rather than commercial or industrial.

In order to assess the Project’s potential for impacts associated with greenhouse gas emissions, Illingworth & Rodkin, Inc., (“I&R”) a professional air quality consulting firm, prepared a detailed greenhouse gas emissions evaluation. I&R used CalEEMod to estimate greenhouse emissions from on-site construction and operational activities, including energy usage and vehicle trips. The resulting emissions were compared against a significance threshold of 1,100 MT CO₂e/year. See resulting greenhouse gas emissions summary in Table C, below:

**TABLE C
ANNUAL PROJECT GREENHOUSE GAS EMISSIONS**

Source Category	Proposed Project (MT CO ₂ e/yr)	
	2022	2030
Area	0	0
Energy Consumption	705	705
Mobile	164	133
Solid Waste Generation	21	21
Stationary (Boilers)	141	141
Total Emissions (MT CO₂e/yr)	1,031	1,000
Significance Threshold	1,100 MT CO ₂ e/yr	
Exceed Threshold?	No	No

I&R’s greenhouse gas emissions analysis concludes that the Project would not exceed the relevant significance threshold of 1,100 MT CO₂e/year, and would not conflict or otherwise interfere with the County’s General Plan, CMMLUO, or statewide GHG reduction measures. Therefore, a **less than significant impact** relating to greenhouse gas emissions would occur.

IX. HAZARDS AND HAZARDOUS MATERIALS.

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

- a.b. No storage of fertilizers, pesticides, or hazardous materials is planned to occur on the Site. All fertilizers and other materials will be stored on the adjacent property in facilities already in use for the existing agricultural operation. The adjacent parcel where this storage will occur is under common ownership and is currently setup and permitted to store and manage fertilizers, pesticides, and hazardous materials used in existing agricultural operations. The materials will be stored in fully enclosed, watertight containers, and in a manner so that they cannot enter or be transported into surface waters or groundwater. In the event that future storage of hazardous materials was to occur on the Project Site that exceeded applicable regulatory thresholds, the applicant would be required to file a Hazardous Materials Business Plan with the County Division of Environmental Health which detailed storage, quantities, labeling, and waste management requirements.

With respect to use of hazardous materials during Project activities, the Project will involve vehicles and small farming equipment that use petroleum products (gasoline and diesel fuel), vehicle fluids and lubricants; however, these fuels and oil products will be contained within the vehicles themselves and no fuel/oils are expected to be stored on the Project Site. Additionally, as part of the proposed cultivation, State of CA approved agricultural chemicals (e.g., PureCrop1, Regalia, Javelin) would be applied to the cannabis plants to control pests and mold. Approved chemicals would be applied at agronomic rates according to manufacturer's specifications.

Consistent with CDFA §8307, for all pesticides that are exempt from registration requirements, cultivation sites must comply with all pesticide laws and regulations enforced by the Department of Pesticide regulation and with the following pesticide application and storage protocols

1. Comply with all pesticide label directions;
2. Store chemicals in a secure building or shed to prevent access by wildlife;
3. Contain any chemical leaks and immediately clean up any spills;
4. Apply the minimum amount of product necessary to control the target pest;
5. Prevent offsite drift;
6. Do not apply pesticides when pollinators are present;
7. Do not allow drift to flowering plants attractive to pollinators;
8. Do not spray directly to surface water or allow pesticide product to drift to surface water. Spray only when wind is blowing away from surface water bodies;
9. Do not apply pesticides when they may reach surface water or groundwater; and
10. Only use properly labeled pesticides. If no label is available consult the Department of Pesticide Regulation.

ALC has considerable experience managing and using fertilizers, pesticides, and other products in existing agricultural operations on the Project Site and adjoining parcels, and has developed detailed Standard Operating Procedures for use and management

of pesticides, injury and illness prevention, and waste management. In addition, ALC has developed project-specific waste management and pest management plans, consistent with State of California cultivation licensing requirements. Further, the Project will comply with the CMMLUO performance standards, and the Best Practicable Treatment or Control (BPTC) measures of State Water Resources Control Board (SWRCB) Order WQ 2019-0001-DWQ. The SWRCB program and County ordinance have “standard conditions” applicable to cannabis operations that address impacts from the storage and use of hazardous materials which include the following requirements:

- Any pesticide or herbicide product application be consistent with product labeling and be managed to ensure that they will not enter or be released into surface or groundwater.
- Petroleum products and other liquid chemicals be stored in containers and under conditions appropriate for the chemical with impervious secondary containment.
- Implementation of spill prevention, control, and countermeasures (SPCC) and have appropriate cleanup materials available onsite.

With appropriate storage, handling, and application practices that comply with the requirements of CDFA, SWRCB and Humboldt County, it is not anticipated that the use of these materials at the facility will pose a significant hazard. In the event of upset or accident conditions, it is unlikely that these hazardous materials would be released in a manner that would create a significant hazard to the public or the environment. Therefore, the Project will not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment and a ***less than significant impact*** would occur.

- c. There are no schools located within one-quarter mile of the Project Site. The City of Arcata School District owns property located a minimum of 600 feet to the east (although it is currently developed to agriculture). The Mad River Montessori Preschool / Fuente Nueva Charter School is located off of Janes Road approximately 2,000 feet to the southeast. Therefore, the Project will not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, and ***no impact*** would occur.
- d. The State’s Hazardous Waste and Substances Sites List (Cortese List, Government Code Section 65962.5) identifies sites with leaking underground fuel tanks, hazardous waste facilities subject to corrective actions, solid waste disposal facilities from which there is a known migration of hazardous waste, and other sites where environmental releases have occurred.

Review of information available on the SWRCB Geotracker and DTSC Envirostor (consistent with §8102(q) of CDFA regulations) websites indicates that there are no open

cases on the Project Site involving impacted soil and groundwater from Leaking Underground Storage Tanks (LUSTs) or other sources. There is an open case (Simpson Timber Company; T0602393409) identified at the former mill site on adjacent APN 506-231-018. The case summary on the SWRCB Geotracker website describes remediation of soil and water at the former mill site in 1997, with current case status identified as “Open – Verification Monitoring.” A Phase I Environmental Site Assessment was completed for the Project Site in June 2015, which identified the aforementioned Simpson Timber Company known environmental condition, but did not identify any environmental issues warranting additional investigation on the Project Site. Accordingly, the Project is not located on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and would not create a significant hazard to the public or the environment, and **no impact** would occur.

- e. The Project is not within two miles of a public airport. California Redwood Coast – Humboldt County Airport is approximately 5.4 miles to the north and Murray Field Airport is approximately 5.4 miles to the south. Therefore, the Project would not result in a safety hazard for people residing or working in the Project area, and **no impact** would occur.
- f. The Project would be required to comply with the Humboldt County Fire Safe Ordinance (County Code Section 31111). The County Fire Safe Ordinance provides specific standards for roads providing ingress and egress, signage, and setback distances for maintaining defensible space. The Project Site is accessed by existing encroachments/roads off of Foster Avenue and 27th Street. As such, the Project would not impair the implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan, and **no impact** would occur.
- g. The Project Site is located in an area of low Fire Hazard Rating and within the Arcata Fire Protection District. The Project area, and surroundings, are comprised of developed agricultural and scattered rural residential with no significant vegetation or trees. The access roads will be maintained in a state such that they are free of vegetation during times of activity. Fuels and other potentially flammable chemicals will be stored in containers designed for fuel storage that includes secondary containment and a Hazardous Materials Business Plan will be maintained (if applicable regulatory thresholds are exceeded) that outlines storage requirements and spill response procedures. A new 100,000-gallon water storage tank will be located on the Site and available for fire suppression. In addition, the Project will comply with the Humboldt County Fire Safe Ordinance. Based on the nature of the Project and Site location, the Project will not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires **no impact** to wildland fires will occur.

X. HYDROLOGY AND WATER QUALITY.	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) result in substantial erosion or siltation on- or off-site	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

- a. A Project-specific wetland delineation conducted by SHN did not identify any wetlands within the Project area, but did identify a man-made roadside drainage ditch approximately 5,100 square feet in size containing wetland indicators located along the existing access road at the southwest border of the Project Site. The drainage ditch is classified as a Class IV watercourse (*all other man-made irrigation canals*) under the State Water Resources Control Board (SWRCB) Order WQ 2019-0001-DWQ, with no prescribed setback requirements. The drainage ditch is located outside of the Project boundary, and will be conserved and not disrupted by Project activities (with exception of routine maintenance of the ditch, consistent with current practice).

The Project does not involve the removal of any trees within the Project area, or vegetation outside of the Project footprint that could result in erosion. The Project grading and site plans were developed by professional engineering firm Wallace Group, who also prepared a technical memorandum addressing storm water management, including storm water detention basin sizing and design.

As part of the proposed cultivation, State of California approved agricultural chemicals (e.g., pesticides and fungicides) would be applied to the cannabis plants to address pest and mold issues. The proposed cultivation activities will not produce wastewater discharge since the cultivation will occur within hoop structures, and irrigation water and fertilizers will be administered at specific agronomic rates that will allow maximum uptake by the plants and prevent excess water beyond the root zone.

The Project would comply with the CMMLUO performance standards and CDFA regulations related to pesticide use. In addition, the Project would comply with the hazardous materials control measures of SWRCB Order WQ 2019-0001-DWQ. The SWRCB program and County ordinance have “standard conditions” applicable to cannabis operations that address impacts from the storage and use of hazardous materials which include the following requirements:

- Any pesticide or herbicide product application be consistent with product labeling and be managed to ensure that they will not enter or be released into surface or groundwater.
- Petroleum products and other liquid chemicals be stored in containers and under conditions appropriate for the chemical with secondary containment.
- Implementation of spill prevention, control, and countermeasures (SPCC) and have appropriate cleanup materials available onsite.

In addition, SWRCB Order WQ 2019-0001-DWQ prescribes Best Practicable Treatment or Control measures to control runoff and erosion, including monitoring of erosion control measures during and after design storm events, and repair or replacement, as needed, of ineffective erosion control measures immediately.

Consistent with §8102(dd) of the CDFA regulations, the Project Site is not located in whole or in part in a watershed or other geographic area that the State Water Resources Control Board or the Department of Fish and Wildlife has determined to be significantly adversely impacted by cannabis cultivation

Given the water quality protection measures required to be implemented under the existing regulatory framework, it is not anticipated that the Project would violate any water quality standards or waste discharge requirements or otherwise degrade water quality, and impacts would be *less than significant*.

- b. Water for irrigation will be supplied by an existing permitted on-site groundwater well (County Permit Number 18/19-0783). The well is located east of the Project area on an adjoining parcel under common ownership (APN 505-151-012). The well is completed to a depth of approximately 150 feet and has an estimated yield of 400 gallons per minute according to the Well Completion Report. As documented by the well driller (Rich Well Drilling), the well is screened approximately 100' below surface in a state designated groundwater basin (Mad River Valley - Mad River Lowland; 1-008.01), and has no hydraulic connection to any surface water or larger shallow homogeneous aquifer.

Irrigation water will be needed from April through October of each year, with no irrigation water anticipated during the months of November through March. Irrigation will be controlled by an automated irrigation system (e.g., Priva process control system) that will measure soil moisture and the surrounding environment to deliver precise water-nutrient needs. At all times, water will be applied using no more than agronomic rates. The Project’s annual irrigation demand has been estimated at 52 acre-feet (17 million gallons), with a monthly maximum of approximately 12 acre-feet (4 million gallons) during the month of July. The estimated output of the existing on-site groundwater well is approximately 1.8 acre-feet (576,000 gallons) per day, indicating sufficient water supply to service the irrigation demands of the Project.

The Project’s estimated irrigation water usage, by month, is shown in Table D, below.

**TABLE D
PROJECTED IRRIGATION WATER USAGE**

	Month ¹						
	April	May	June	July	August	September	October
Gallons (millions)	0.9	2.3	3.5	4.0	3.4	2.2	0.7
Acre-Feet	2.6	7.1	10.9	12.2	10.5	6.6	2.2

Notes:

- 1. No irrigation water expected during the months of November through March.

Irrigation will be controlled by an automated irrigation system (e.g., Priva process control system) that will measure soil moisture and the surrounding environment to deliver precise water-nutrient needs. The automated irrigation system will provide an advanced

fertilizer mixing system, and control desired electrical conductivity, pH and flow rate. At all times, water will be applied using no more than agronomic rates.

Given the design of the Project and demonstration of adequate water supply using an existing groundwater well, the Project is not anticipated to substantially deplete groundwater supplies or affect the production rate of nearby wells, and a ***less than significant impact*** would occur.

- c. Under existing conditions, drainage from the area of existing hoop structures in the northwest corner of the Site is routed to a retention basin located west of the hoop structures on an adjacent ALC parcel. Surface runoff for the remainder of the Site is directed to onsite drainage ditches that tie into a drainageway that flows northwest into the same retention basin, or drain southward into a wetland slough (located on an adjacent parcel southeast of the Project area). The slough flows westward to an underground culvert, which is routed underneath the mill warehouse buildings and into Liscom Slough.

The Project will add impervious area to the Site resulting from the construction of hoop structures, administration buildings, loading areas, and concrete walkways. A professional engineering firm (Wallace Group) developed a project-specific storm water management design to effectively manage surface runoff. Based on the topography of the Site, the post-development grading design splits runoff into two sub-catchments, one collects the runoff from the northern portion of the Site, and the other the southern portion. The proposed northern sub-catchment will be primarily hoop structures and open space, while the proposed southern sub-catchment will be primarily hoop structures, open space, and office buildings located in the southwest corner of the Site. In order to separate applied irrigation water and storm water runoff, the proposed development utilizes hoop houses to isolate the cannabis crops. Runoff from the hoop structures is conveyed to storm water retention basins through a series of perforated pipes that run in between all of the hoop houses. The perforated pipes are connected to a larger network of storm drains which convey runoff to the retention basins. The Site has two proposed retention basins, one for each sub-catchment. The preliminary design for the northeast retention basin will provide 0.5 acre-feet of storage, and the southern retention basin will provide 0.33 acre-feet. Each basin will be equipped with an outlet structure which will allow excess flow from larger storm events to be controlled and drained into the existing ditches adjacent to the property. The engineering design demonstrates that the post-development runoff volume of the 85th percentile storm will be equal to or less than the pre-development runoff volume, consistent with SWRCB General Construction Permit post-construction storm water requirements.

In addition to implementing engineering design standards consistent with State requirements, the Project will maintain coverage under SWRCB Order WQ 2019-0001-DWQ, which prescribes Best Practicable Treatment or Control measures to control runoff and erosion, including monitoring of erosion control measures during and after design

storm events, and repair or replacement, as needed, of ineffective erosion control measures immediately.

As a result, the Project would not substantially alter the existing drainage pattern of the Site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion, siltation, polluted runoff or flooding on- or off-site, and a ***less than significant impact*** would occur.

- d. The Project is not located near a large body of water capable of producing a seiche, and is not located in a tsunami inundation area. In addition, according to an October 30, 1997 Letter of Map Amendment from the Federal Emergency Management Agency (“FEMA”), the Site is not located in a Special Flood Hazard Area, that is the area that would be inundated by a flood having a one percent chance of being equaled or exceeded in any given year. As a result, the Project would have ***no impact*** from release of pollutants due to inundation from seiche, tsunami, or floods.
- e. Water for irrigation will be supplied by an existing permitted on-site groundwater well (County Permit Number 18/19-0783). The well is completed to a depth of approximately 150 feet and has an estimated yield of 400 gallons per minute according to the Well Completion Report. The Project’s annual irrigation demand has been estimated at 52 acre-feet (17 million gallons), with a monthly maximum of approximately 12 acre-feet (4 million gallons) during the month of July. The estimated output of the existing on-site groundwater well is approximately 1.8 acre-feet (576,000 gallons) per day, indicating sufficient water supply to service the irrigation demands of the Project. At all times, water will be applied using no more than agronomic rates.

The well is screened approximately 100' below surface in a state designated groundwater basin (Mad River Valley - Mad River Lowland; 1-008.01), and has no hydraulic connection to any surface water or larger shallow homogeneous aquifer. In addition, the Project would comply with the CMMLUO performance standards and will maintain coverage under SWRCB Order WQ 2019-0001-DWQ, which prescribes Best Practicable Treatment or Control measures to control runoff and erosion.

Therefore, the Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan and a ***less than significant impact*** would occur.

XI. LAND USE AND PLANNING.	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

- a. The Project parcels are a component of a large private land holding (350+ acres) of the Project applicant. The predominant land uses in the vicinity of the Project include additional land holdings of the Project applicant, as well as mixed commercial, agricultural and scattered rural residential uses. The surrounding vicinity is sparsely populated with approximately five residences located within 1,000 feet of the Project Site. The Project does not propose to block or impede any adjacent roads (e.g., Foster Avenue or 27th Street), and existing access will be maintained. The Project would not divide any established communities and **no impact** would occur.
- b. The Project would not result in changes to existing land use, zoning, or specific plans in Humboldt County. The Project would not conflict with any goals, policies, or objectives in the Humboldt County General Plan intended to mitigate potential environmental impacts. Land uses and zoning would remain unchanged. The agricultural use associated with the Project would be consistent with the allowable land uses under the Humboldt County General Plan and Zoning Ordinance. The Project has been designed to be consistent with the CMMLUO.

Although not located within the City limits, the Site is identified within the City of Arcata’s Western Greenbelt Plan (2018). According to its text, the Western Greenbelt Plan serves as a “flexible, comprehensive, and long-range planning document. It is a guide for identifying significant open space areas within the Greenbelt, as well as a guide for potential protection of agricultural land and natural resources, and it is a tool for planning and developing the entire Greenbelt system.” As a primary purpose, the Greenbelt Plan seeks to promote and protect agricultural uses west of the City in the Arcata Bottoms. The Greenbelt Plan notes that the Arcata Bottom lands, including lands to the west of the defined Greenbelt and within Arcata’s Planning Area boundary, are largely devoted to larger farms, dairies, livestock ranches and other agricultural operations that contribute to the agricultural economy of the entire region. The Project Site (component of the Sun Valley Flower Farm) is identified as an existing agricultural operation within the Arcata

Bottom lands. The proposed Project is consistent with the intent of the Greenbelt, and will utilize a property for agricultural purposes (cultivation) that could otherwise be put to heavy industrial use per the Site's zoning.

According to the U.S. Fish & Wildlife Service Environmental Conservation Online System (ECOS), the Project Site is not located within the boundaries of a Habitat Conservation Plan. Habitat Conservation Plans in Humboldt County include the following: 1) Green Diamond Resource Company California Timberlands & Northern Spotted Owl (formerly Simpson Timber Company); 2) Humboldt Redwood Company (formerly Pacific Lumber, Headwaters); and 3) Regli Estates. These Habitat Conservation Plans primarily apply to forest lands in the County. Further, according to the California Department of Fish & Wildlife website, the Project Site is not located in the boundaries of a Natural Community Conservation Plan. The conservation plans for Humboldt County, listed on California Regional Conservation Plans Map on the CDFW website, include the Green Diamond and Humboldt Redwoods Company (previously Pacific Lumber Company) Habitat Conservation Plans.

As a result, ***no impact*** would occur.

XII. MINERAL RESOURCES.

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

- a,b. The Project Site is not classified as a Mineral Resource Zone (e.g., MRZ-2) by the State Geologist, and does not contain any known locally important mineral resources. Implementation of the Project would not result in the loss of availability of a known mineral resource, would not result in the loss of availability of a locally important mineral resource recovery site, and ***no impact*** would occur.

XIII. NOISE.

Would the project result in:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

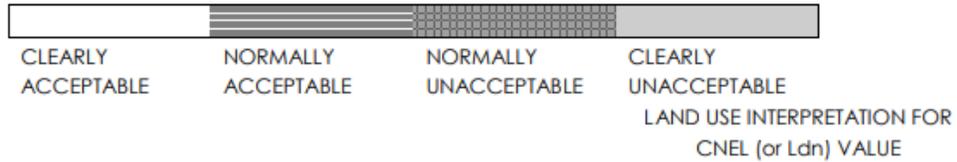
Discussion

- a. The Project parcels are a component of a large private land holding (350+ acres) of the Project applicant. The predominant land uses in the vicinity of the Project include additional land holdings of the Project applicant, as well as mixed commercial, agricultural and scattered rural residential uses. The surrounding vicinity is sparsely populated with approximately five residences located within 1,000 feet of the Project Site.

Humboldt County Noise Element of the General Plan

The Noise Element of the Humboldt County General Plan establishes maximum acceptable noise levels for various land use categories. According to the Noise Element, evaluating new development projects for noise impacts should be based on a comparison of the noise compatibility standards (Table 13-C of General Plan) with noise contours and other available information. Appropriate standards for short-term noise levels measured by Lmax varies with the type of land use and time of day.

TABLE E
LAND USE / NOISE COMPATIBILITY STANDARDS (TABLE 13-C OF GENERAL PLAN)



LAND USE CATEGORY	Maximum Interior Noise Levels*	50-60	61-70	71-80	81-90	91+
Residential Single Family, Duplex, Mobile Homes	45			Normal Unacceptable	Clearly Unacceptable	
Residential Multiple Family, Dormitories, etc.	45			Normal Unacceptable	Clearly Unacceptable	
Transient Lodging	45			Normal Unacceptable	Clearly Unacceptable	
School Classrooms, Libraries, Churches	45			Normal Unacceptable	Clearly Unacceptable	
Hospitals, Nursing Homes	45			Normal Unacceptable	Clearly Unacceptable	
Auditoriums, Concert Halls, Music Shells	35	Clearly Acceptable	Clearly Acceptable	Normal Unacceptable	Clearly Unacceptable	
Sports Arenas, Outdoor Spectator Sports				Normal Unacceptable	Clearly Unacceptable	
Playgrounds, Neighborhood Parks				Normal Unacceptable	Clearly Unacceptable	
Golf Courses, Riding Stables, Water Rec., Cemeteries				Normal Unacceptable	Clearly Unacceptable	
Office Buildings, Personal, Business & Professional	50			Normal Unacceptable	Clearly Unacceptable	
Commercial: Retail, Movie Theaters, Restaurants	50			Normal Unacceptable	Clearly Unacceptable	
Commercial: Wholesale, Some Retail, Ind., Mfg., Util.				Normal Unacceptable	Clearly Unacceptable	
Manufacturing, Communications(Noise Sensitive)				Normal Unacceptable	Clearly Unacceptable	
Livestock Farming, Animal Breeding				Normal Unacceptable	Clearly Unacceptable	
Agriculture (except Livestock), Mining, Fishing				Normal Unacceptable	Clearly Unacceptable	
Public Right-of-Way				Normal Unacceptable	Clearly Unacceptable	
Extensive Natural Recreation Areas				Normal Unacceptable	Clearly Unacceptable	

*Due to exterior sources

Project activities are not expected to generate significant noise levels that will exceed the Humboldt County General Plan Noise Element standards. Project activities within the administration buildings and hoop structures will be limited from a noise-generating perspective (e.g., conventional air movement fans, HVAC equipment) and will meet applicable County building and zoning code requirements for noise levels. Outdoor noise-generating activities will include vehicle use and small agricultural support equipment (e.g., ATVs, tractors, and forklifts). A generator is not anticipated. From a noise standpoint, Project activities will be consistent with agricultural and vehicle equipment used at the Site under baseline conditions.

TABLE F
REFERENCE NOISE LEVELS

Type of Vehicle	Noise Level Lmax (dB)
Auto	50 (at 100 feet)
Pickup Truck	75 (at 50 feet)
Tractor	84 (at 50 feet)

Reference: Construction Noise Impact Assessment
<https://www.nrc.gov/docs/ML1225/ML12250A723.pdf>

Table F, above, shows noise levels for typical vehicles and agricultural support equipment that will be used at the Site (automobiles, pickup trucks, tractors). Based on these measurements, noise levels from Project activities are expected to be below the “normally acceptable” or “clearly acceptable” CNEL level by the time they reach the nearest residence.

Based on the types of equipment to be utilized by the Project, and the distance to nearby receptors, impacts related to noise are expected to be **less than significant**.

- b. The surrounding vicinity is sparsely populated with approximately five residences located within 1,000 feet of the Project Site. Further, the Project proposes agricultural activities consistent with the current and historical use of the Site, and no uses are proposed that would generate excessive groundborne vibration. **No impact** would occur.
- c. The Project is not within two miles of a public airport and is not within an airport land use plan or the vicinity of a private airstrip. Therefore, the Project would expose people to excessive air traffic noise, and **no impact** would occur.

XIV. POPULATION AND HOUSING.

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a, b. The Project would not directly induce population growth because it proposes no residential development. It would not indirectly induce population growth because it would not increase roadway capacity, nor would it extend roads or other infrastructure into previously undeveloped areas. Further, the Project involves no displacement of existing housing or people, as neither occur on the Project Site. Because the Project would not result in population growth in the area, does not involve the creation of, or necessity for, new housing, and would not displace existing housing or people, **no impact** related to population and housing would occur

XV. PUBLIC SERVICES.

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in substantial adverse physical impacts associated with the provisions of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Fire protection	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other Public Facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

- a. The Project Site is located in an area of low Fire Hazard Rating and within the Arcata Fire Protection District. The Project area, and surroundings, are comprised of developed agricultural and scattered rural residential with no significant vegetation or trees. The access roads will be maintained in a state such that they are free of vegetation during times of activity. Fuels and other potentially flammable chemicals will be stored in containers designed for fuel storage that includes secondary containment and a Hazardous Materials Business Plan will be maintained (if applicable regulatory thresholds are exceeded) that outlines storage requirements and spill response procedures. A new 100,000-gallon water storage tank will be located on the Site and available for fire suppression. In addition, the Project will comply with the Humboldt County Fire Safe Ordinance. Based on the nature of the Project and Site location, and compliance with County fire safe ordinance requirements, it is not anticipated that the Project will result in a significant increase in the number of calls-for-service related to fire. As such, the Project will not result in the need for new or physically altered fire protection facilities, and a ***less than significant impact*** would occur.

The Humboldt County Sheriff's Office is responsible for law enforcement in the unincorporated areas of the County. To address potential security issues, the applicant will implement the detailed security plan contained in the Operations Plans plan prepared for the Project. Implementation of the security plan measures and compliance with CMMLUO security and operational performance standards will minimize impacts on local law enforcement. As such, the Project will not result in the need for new or physically altered law enforcement facilities, and a ***less than significant impact*** would occur.

Since the Project does not propose residential development and will not significantly increase the population in the Arcata area, the Project would not create a need for new schools, increase any school population, or increase the demand for public parks or other public facilities such as public health facilities and libraries. As a result, ***no impact*** would occur.

XVI. RECREATION.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

- a,b. As previously described, the Project does not involve the creation of new housing and would not result in population growth in the area. Similarly, new recreational facilities are not proposed as part of the Project and the demand for such facilities would not increase with implementation of the Project. Therefore, because the Project would not result in any increase in the use of, or demand for, parks or recreation facilities, ***no impact*** related to recreation would occur.

XVII. TRANSPORTATION

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

- a. W-Trans Traffic Engineering Consultants prepared a Traffic Impact Study for the Project, analyzing potential impacts relative to circulation, access for pedestrians, bicyclists, and to transit. Consistent with SB 743, the project’s transportation impacts were analyzed using Vehicle Miles Traveled (VMT). While no longer a part of the CEQA review process, vehicular traffic service levels at key intersections were also evaluated for consistency with General Plan policies by determining the number of new trips that the Project would be expected to generate, distributing these trips to the surrounding street system based on anticipated travel patterns specific to the Project, then analyzing the impact the new traffic would be expected to have on the study intersections.

Circulation: The Traffic Impact Study found that all study intersections are expected to continue operating acceptably at LOS C or better and that the Project would not result in an adverse effect to the surrounding roadway network in all modeled scenarios with the exception of the Future Plus Project Conditions Scenario. In that scenario, study intersections are expected to continue operating acceptably at LOS C or better overall upon the addition of project trips to the anticipated Future volumes, except for Foster Avenue/Alliance Road and Sunset Avenue/US 101 North Ramps both of which would operate at LOS D overall during the p.m. peak hour. With installation of a mini roundabout at Foster Avenue/Alliance Road and a roundabout at Sunset Avenue/US 101 North Ramps, both intersections would operate acceptably with project trips added to Future volumes. Based on this finding, the Traffic Impact Study recommends that the applicant pay proportional share fees to the City of Arcata to alleviate the project’s contribution to the needed improvements at Foster Avenue/Alliance Road and Sunset Avenue/US 101 North

Ramps, consisting of \$13,512 and \$8,714, respectively. This will be made a condition of project approval for the Conditional Use Permit requested from the County, as a project's effect on automobile delay shall not constitute a significant environmental impact per Section 15064.3(a) of CEQA Guidelines and can't be mitigated through the CEQA process.

Pedestrian: W-Trans found that given the rural location of the Project Site, pedestrian trips to external destinations are expected to be limited. The Project Site is not located within what is generally considered an acceptable walking distance (one-quarter mile) of any destinations that would be reachable with the provision of pedestrian facilities so the lack of existing facilities for pedestrians does not result in an impact. Although external pedestrian trips are not anticipated, internal trips are expected between the various facilities. As shown on the Site plan, pedestrian facilities including sidewalks and pathways would be provided throughout the Site.

Bicycle: W-Trans found that existing bike lanes on Sunset Avenue, Alliance Road, and Foster Avenue together with the shared use of minor streets provide adequate access for bicyclists within the study area. Upon completion of the planned improvements outlined in the City of Arcata Pedestrian & Bicycle Master Plan and the Humboldt Regional Bicycle Plan, including the provision of Class III bike routes on Foster Avenue between Alliance Road and Janes Road and on Janes Road to the south of Foster Avenue, access for bicyclists would be improved and the project Site would be connected to the surrounding network. It should be noted that even upon completion of the planned improvements, the approximately one-third mile segment of Foster Avenue between the project driveway and Janes Road would not have a bicycle facility; however, given the low volume of vehicles and short length of the segment, it would be considered acceptable for bicyclists to share the roadway with motorists. Zoning regulations for the County of Humboldt do not specify bicycle parking requirements for cultivation uses, though because the Site would be accessible for bicyclists the Traffic Impact Study recommends that bicycle parking be provided at a rate of one space for every 10 employees. This would translate to a need for 12 bicycle parking spaces based on the maximum employment count of 116 employees. The Project Site plan incorporates the W-Trans recommendation for 12 bicycle parking spaces.

Transit: W-Trans found that the lack of existing transit service within acceptable walking distance of the Project Site is typical for its rural location. Should an employee need to use transit, they could bike to the nearest transit stops at Foster Avenue/Alliance Road, the Arcata Transit Center, or Arcata High School. The lack of transit facilities serving the project does not result in an impact given the rural location and expected demand.

The Project will not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities and a ***less than significant impact*** would occur.

- b. Senate Bill (SB) 743 established a change in the metric to be applied for determining transportation impacts associated with development projects. Rather than the delay-based criteria associated with a Level of Service (LOS) analysis, the increase in Vehicle Miles Traveled (VMT) as a result of a project is now the basis for determining CEQA impacts with respect to transportation and traffic. As of the date of this analysis, the County has not yet established thresholds of significance related to VMT. As a result, the project-related VMT impacts were assessed based on guidance provided by the California Governor's Office of Planning and Research (OPR) in the publication Transportation Impacts (SB 743) CEQA Guidelines Update and Technical Advisory, 2018.

OPR provides guidance for VMT analysis based on VMT per capita for residential projects and VMT per worker for employment-based projects. Since the VMT associated with the proposed project would be primarily associated with employment-based travel, VMT per employee was used as the metric for this analysis. Projects that generate vehicle travel exceeding 15 percent below the existing regional average VMT per employee may indicate a significant transportation impact and similarly, projects which achieve a VMT per employee of 15% or more below that of existing development is reasonable to consider as less than significant. OPR guidance states that a county is an appropriate geographical boundary for a baseline if that is the area within which workers of the project would be expected to live. Employees of the proposed project are expected to reside within the County Humboldt so countywide data was used to establish the baseline VMT per employee.

The County of Humboldt has a travel demand model that includes numerous traffic analysis zones (TAZs) within the region that contain VMT information. Caltrans District 1 staff was consulted to obtain the VMT information for the entire county as well as TAZ 235, which is the zone in which the project Site is located. The countywide average daily VMT per employee of 14.59 was used as a baseline for this analysis. Applying OPR's guidance, an employee-based project generating a VMT that is 15 percent or more below this value, or 12.40 miles per employee per day or less, would reasonably have a less-than-significant VMT impact. TAZ 235 has a daily VMT per employee of 2.41; however, the TAZ only has two employees so data for adjacent TAZs was also reviewed. The existing processing uses on adjacent APN 506-231-018 are located in TAZ 886 along with the Sun Valley Group flower business to the north of the project Site. This TAZ has 505 employees with a VMT per employee of 3.64, or approximately 75 percent below the existing countywide average. Given the similar land use characteristics to the proposed project and substantially more employee data points available, the VMT for TAZ 886 rather than TAZ 235 was determined to be a better representation of the project. Since it is reasonable to presume that the travel patterns of workers for the proposed project would be similar to those of workers in TAZ 886, it is reasonable to conclude that the project would have a VMT per employee which is well below the 15 percent or more threshold suggested by OPR's Technical Advisory Document on VMT. Accordingly, a ***less than significant*** VMT impact is associated with employee travel.

- c. The Project would use existing, public roadways to access the Project Site and would use gravel access roads internal to the Project Site. The internal access roads would be improved to standards consistent with the envisioned level of use. The Project does not include construction of roads outside of the Project Site.

All activities associated with operation of the Project would occur entirely within the Project Site, and would not involve driving or operating farm equipment external to the Site. On public roads, delivery trucks and employee vehicles would use public roadways when traveling to and from the Project Site.

W-Trans found that sight lines on Foster Avenue are adequate to accommodate all turns into and out of the project driveway, and that no channelization in the form of a turn pocket would be warranted at the project driveway.

The Project will not substantially increase hazards due to a design feature (e.g. sharp curves or dangerous intersection) or incompatible uses (e.g. farm equipment), and a ***less than significant impact*** would occur.

- d. The Project would use existing roadways (e.g., Foster Avenue) and encroachments to access the Project Site. The Project also proposes to improve existing access roads within the Project Site and construct parking areas to serve the proposed cannabis use. The Project will be required to comply with the Humboldt County Fire Safe Ordinance 1952, which the California Board of Forestry and Fire Protection has accepted as functionally equivalent to PRC 4290. The County Fire Safe Ordinance provides specific standards for roads providing ingress and egress, signage, and setback distances for maintaining defensible space. Compliance with the County's Fire Safe Ordinance will ensure that adequate access for emergency vehicles is provided. Therefore, the Project will result in adequate emergency access, and a ***less than significant impact*** would occur.

XVIII. TRIBAL CULTURAL RESOURCES.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

a.i.ii. Tribal cultural resources potentially affected by the Project activities were investigated by Archaeological Research and Supply Company in May 2018 (updated June 2020). The investigation included a records search through the California Historical Resources Information System's regional Northwest Center (NWIC), Native American Heritage Commission (NAHC) inquiry, coordination with local tribes, and pedestrian survey of the Site. In addition, representatives of the Blue Lake Rancheria, Bear River Band of Rohnerville Rancheria, and the Wiyot Tribe conducted a field visit with Archaeological Research and Supply Company in May 2018.

Consultation with Native American tribes traditionally and culturally associated with the project area has been an ongoing part of the process. Specifically, an invitation for Tribal Consultation pursuant to AB 52 was sent to the Bear River Band of Rohnerville Rancheria, Blue Lake Rancheria, the Wiyot Tribe, and Cher-Ae Heights Indian Community of the

Trinidad Rancheria that were all identified as potentially being affected by the NAHC on July 29, 2020. The Tribes did not accept the request.

No prehistoric resources were identified within the Project area, but one 1920-50s area historic trash scatter was identified. The cultural resources study concludes that the Project will not impact significant historic or prehistoric archaeological resources so long as earth disturbances do not extend more than 8 feet below the existing ground surface and a heightened inadvertent discovery protocol is implemented.

The Project does not propose to excavate greater than 8 feet in depth. To address the unlikely event that buried tribal cultural resource deposits are discovered during Project activities, the following mitigation measure is proposed relating to inadvertent discovery procedures:

Mitigation Measure TCR-1: Inadvertent Discovery Protocol

If suspected tribal cultural resources, such as lithic materials or ground stone, historic debris, building foundations, or bone are discovered during Project activities, work shall be stopped within 100 feet of the discovery. Contact will be made to the County, a professional archaeologist and representatives from the Blue Lake Rancheria, Bear River Band of Rohnerville Rancheria, and Wiyot Tribe. The professional historic resource consultant, Tribes and County officials will coordinate provide an assessment of the find and determine the significance and recommend next steps.

If human remains are discovered during Project activities, work will stop at the discovery location, within 100 feet, and any nearby area reasonably suspected to overlie adjacent to human remains (Public Resources Code, Section 7050.5). The Humboldt County coroner will be contacted to determine if the cause of death must be investigated. If the coroner determines that the remains are of Native American origin, it is necessary to comply with state laws relating to the disposition of Native American burials, which fall within the jurisdiction of the NAHC (Public Resources Code, Section 5097). The coroner will contact the NAHC. The descendants or most likely descendants of the deceased will be contacted, and work will not resume until they have made a recommendation to the landowner or the person responsible for the excavation work for means of treatment and disposition, with appropriate dignity, of the human remains and any associated grave goods, as provided in Public Resources Code, Section 5097.98.

Level of Significance After Mitigation:

Potential impacts associated with the disturbance of cultural resources that may be encountered during Project activities would be ***less than significant*** with implementation of Mitigation Measure TCR-1.

XIX. UTILITIES AND SERVICE SYSTEMS.

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructures, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

a. **Water supply:** The Project's annual irrigation demand has been estimated at 52 acre-feet (17 million gallons), with a monthly maximum of approximately 12 acre-feet (4 million gallons) during the month of July. The estimated output of the existing on-site groundwater well is approximately 1.8 acre-feet (576,000 gallons) per day, indicating sufficient water supply to service the irrigation demands of the Project. Drinking water will be supplied by either, or a combination of, a new 100,000-gallon water storage tank fed by the existing well, or an existing potable water supply line serviced by the City of Arcata that crosses the Site.

Wastewater Treatment: The Project area will be served by a new on-site wastewater treatment system to be reviewed and approved by the County Department of Environmental Health. The system will be located on the eastern boundary of the Project

area, as shown on the proposed Site plan. The system was designed by SHN, who conducted a septic suitability assessment and determined that the soils at the Project Site are capable of supporting a new wastewater treatment system of adequate size for the Project. In addition, temporary restrooms may be supplied for Site employees during peak harvest periods.

Storm Water: The Project will add impervious area to the Site resulting from the construction of hoop structures, administration buildings, loading areas, and concrete walkways. A professional engineering firm (Wallace Group) developed a project-specific storm water management design to effectively manage surface runoff. With the engineered design, runoff from the hoop structures is conveyed to storm water retention basins through a series of perforated pipes that run in between all of the hoop houses. The perforated pipes are connected to a larger network of storm drains which convey runoff to two properly sized retention basins. Each basin will be equipped with an outlet structure which will allow excess flow from larger storm events to be controlled and drained into the existing ditches adjacent to the property. The engineering design demonstrates that the post-development runoff volume of the 85th percentile storm will be equal to or less than the pre-development runoff volume, consistent with SWRCB General Construction Permit post-construction storm water requirements.

Electric: The property is serviced by an existing Pacific Gas and Electric (PG&E) service line, and no new or expanded energy facilities are needed in connection with the Project.

Natural Gas: The Project includes installation and operation of three natural gas boilers that will be used to provide temperature control within the hoop structures. The Site is serviced by an existing natural gas line, and no new or expanded gas facilities are needed in connection with the Project.

Telecommunications: The Site is serviced by existing telecommunication and internet lines, and no new or expanded telecommunications facilities are needed in connection with the Project.

The Project would not require relocation or construction of new utilities that may cause significant environmental impacts, and a ***less than significant impact*** would occur.

- b. Water for irrigation will be supplied by an existing permitted on-site groundwater well (County Permit Number 18/19-0783). The well is located east of the Project area on an adjoining parcel under common ownership (APN 505-151-012). The well is completed to a depth of approximately 150 feet and has an estimated yield of 400 gallons per minute according to the Well Completion Report. As documented by the well driller (Rich Well Drilling), the well is screened approximately 100' below surface in a state designated groundwater basin (Mad River Valley - Mad River Lowland; 1-008.01), and has no hydraulic connection to any surface water or larger shallow homogeneous aquifer.

Irrigation water will be needed from April through October of each year, with no irrigation water anticipated during the months of November through March. Irrigation will be controlled by an automated irrigation system (e.g., Priva process control system) that will measure soil moisture and the surrounding environment to deliver precise water-nutrient needs. At all times, water will be applied using no more than agronomic rates. The Project's annual irrigation demand has been estimated at 52 acre-feet (17 million gallons), with a monthly maximum of approximately 12 acre-feet (4 million gallons) during the month of July. The estimated output of the existing on-site groundwater well is approximately 1.8 acre-feet (576,000 gallons) per day, indicating sufficient water supply to service the irrigation demands of the Project. An existing potable water supply line serves the Site and will be utilized to supply drinking water for the proposed Project.

Therefore, adequate water supplies are available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years, and a ***less than significant impact*** would occur.

- c. The Project area will be served by a new on-site wastewater treatment system to be reviewed and approved by the County Department of Environmental Health. The system will be located on the eastern boundary of the Project area, as shown on the proposed Site plan. The system was designed by SHN, who conducted a septic suitability assessment and determined that the soils at the Project Site are capable of supporting a new wastewater treatment system of adequate size for the Project. Therefore, ***no impact*** would occur relating to capacity of a local wastewater treatment provider.
- d. The Project's waste generation will involve miscellaneous agricultural refuse and debris, and cannabis waste. Non-cannabis wastes will include empty soil, soil amendment, and fertilizer bags, empty plant pots or containers, and typical refuse. Refuse will be sorted to divert recyclables such as paper, plastic, glass, and metals from the waste stream and taken to a recycling center. The remaining solid wastes will be collected and deposited into a solid waste receptacle for temporary storage, which will be kept covered. The solid waste will be removed from the Site as needed and disposed of at an authorized waste transfer facility. The solid waste receptacle will be sized appropriately for the volume of waste generated and may be adjusted in size periodically as conditions warrant. It is anticipated that no more than one dumpster per week will be needed. Cannabis waste will include stems, stalks, degraded cannabis plant material, and general cannabis biomass.

Consistent with §8108 and §8308 of the CDFA regulations, cannabis waste will be managed through either or a combination of on-site composting and off-site disposal by properly licensed collection and processing providers. collection and processing by a local agency, a waste hauler franchised or contracted by a local agency, or a private waste hauler permitted by a local agency.

For on-site composting, cannabis waste will be stored and managed in a designated compost management area at the Site. Composting activities will be conducted in accordance with local and state regulations covering composting activities.

For off-site disposal, collection and processing will be performed by a local agency, a waste hauler franchised or contracted by a local agency, or a private waste hauler permitted by a local agency. The cannabis waste will be made unusable and unrecognizable ("destroyed") prior to leaving the Site through a County approved method involving either grinding and/or mixing with other plant materials for composting, or grinding and incorporating the cannabis waste with approved non-consumable solid wastes such that the resulting mixture is at least 50 percent non-cannabis waste.

According to the Humboldt County General Plan, the County, currently trucks its solid waste to a site near Medford, Oregon under a long-term contract. It has a subsequent contract to utilize a landfill located in Anderson, California. Together, the County has committed to contracts which meet its landfill disposal needs over the next 20 years. Therefore, the Project will be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs, and a ***less than significant impact*** would occur.

- e. The California Integrated Waste Management Act of 1989 (Public Resources Code Division 30), enacted through Assembly Bill (AB) 939 and modified by subsequent legislation, required all California cities and counties to implement programs to divert waste from landfills (Public Resources Code Section 41780). Compliance with AB 939 is determined by the Department of Resources, Recycling, and Recovery (Cal Recycle). Each county is required to prepare and submit an Integrated Waste Management Plan for expected solid waste generation within the county to the CIWMB. In 2012, the unincorporated area of Humboldt County met or exceeded the waste diversion mandate of 50 percent set by the Integrated Waste Management Act of 1989 (Humboldt County 2014).

The Project's construction and operation activities would comply with all federal, state, and local statutes related to solid waste, including AB 939. This would include compliance with the Humboldt Waste Management Authority's recycling, hazardous waste, and composting programs in the County to comply with AB 939.

Vegetative matter such as root balls, branches, and leaves would be chipped and composted or hauled offsite and disposed of in accordance with County and State requirements.

Therefore, the Project will not violate any federal, state, and local statutes and regulations related to solid waste, and a ***less than significant impact*** would occur.

XX. WILDFIRE.

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a-d. The Project Site is located in an area of low Fire Hazard Rating and within the Arcata Fire Protection District. The Project area, and surroundings, are comprised of developed agricultural and scattered rural residential with no significant vegetation or trees. The access roads will be maintained in a state such that they are free of vegetation during times of activity. Fuels and other potentially flammable chemicals will be stored in containers designed for fuel storage that includes secondary containment and a Hazardous Materials Business Plan will be maintained (if applicable regulatory thresholds are exceeded) that outlines storage requirements and spill response procedures. A new 100,000-gallon water storage tank will be located on the Site and available for fire suppression. In addition, the Project will comply with the Humboldt County Fire Safe Ordinance, which provides specific standards for roads providing ingress and egress, signage, and setback distances for maintaining defensible space.

Accordingly, the Project would not exacerbate wildfire risks and impacts ***no impact*** would occur.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE.	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

- a. All potential impacts to the environment were evaluated as part of the analysis in this document, including potential impacts to habitat for fish or wildlife species, rare or endangered plants and animals, and cultural resources. Where impacts were determined to be potentially significant, mitigation measures have been imposed to reduce those impacts to less than significant levels. Accordingly, with incorporation of the mitigation measures imposed throughout this document, the Project would not substantially degrade the quality of the environment and impacts would be ***less than significant***.

Mitigation:

- All mitigation measures discussed in this document shall apply (See Section 6.4 – Discussion of Mitigation Measures, Monitoring, and Reporting Program).
- b. The following is a list of currently proposed projects within a 1-mile radius of the project site, based on information available to Humboldt County.

- Ryan Simas (County of Humboldt): 10,000 square feet of new mixed-light commercial cannabis cultivation and 4,000 square feet of new indoor commercial cannabis cultivation on a 48.74-acre parcel (3203 Upper Bay Road/APN 507-161-006).
- Park Meadow Estates (County of Humboldt): 10,000 square feet of new mixed-light commercial cannabis cultivation on a 26.16-acre parcel (2160 Foster Avenue/APN 505-151-001). Water will be supplied by a proposed well. A maximum of four employees are anticipated.
- WE Produce (County of Humboldt): New 160,680 square-foot indoor commercial cannabis operation and 30,000 square-foot commercial cannabis nursery on a 9.69-acre parcel (2730 Foster Avenue/APN 506-231-012). Water will be supplied by rainwater catchment. A maximum of 61 employees are anticipated.
- Foster Ave (City of Arcata) Annexation and proposed single-family, multi-family, and assisted living residential development that would provide housing for approximately 269 residents.
- Sunset Terrace (City of Arcata): 142-unit multi-family residential development between Foster Avenue and Sunset Avenue on an approximately 3.56-acre parcel (1301 Sunset Avenue/APN 505-121-034). The proposed units will be all 1-bedroom apartments. This would result in a density of approximately 40 residential units per acre and would provide housing for a minimum of 142 residents.
- Twin Parks (City of Arcata): 40-unit multi-family residential project on the southeast corner of Foster Avenue and Alliance Road on an approximately 1.02-acre parcel (1301 Foster Avenue/APN 505-131-018). The proposed units will be a mix of 1-bedroom and studio apartments. This would result in a density of approximately 39 residential units per acre and would provide housing for a minimum of 40 residents.

The Project will not have impacts that are individually limited, but cumulatively considerable. This Mitigated Negative Declaration documents the Project's design features and mitigation measures that eliminate the Project's potential impacts on the environment or mitigate the potential impacts to a less-than-significant level. The only potentially significant impacts associated with this project were for cultural resources, paleontological resources, and biological resources. As those potential impacts all are completely mitigated for and are only relevant to the project site itself, there are no impacts that would be viewed as cumulatively considerable.

“When there is no substantial evidence of any individual potentially significant effect by a project under review, the lead agency may reasonably conclude the effects of the project will not be cumulatively considerable.” (*Leonoff v. Monterey County Bd. of Supervisors* (1990) 222 Cal.App.3d 1337, 1358; *Sierra Club v. West Side Irrigation Dist.* (2005) 128 Cal.App.4th 690, 701-702; *Hines v. California Coastal Comm’n* (2010) 186 Cal.App.4th 830, 858.)

Further, the Project is consistent with the “Mitigated Negative Declaration for Medical Marijuana Land Use Ordinance – Phase IV – Commercial Cultivation of Cannabis for Medical Use” that Humboldt County adopted in connection with its adoption of the Medical Marijuana Land Use Ordinance. The County MND expressly analyzed the cumulative environmental impacts of commercial cannabis cultivation operations as permitted under the CMMLUO.

The Project is consistent with the CMMLUO and the County MND, and has incorporated mitigation measures to lessen potentially significant impacts to less than significant. Therefore, the Project would not contribute to environmental effects that are individually limited, but cumulatively considerable, and impacts would be ***less than significant***.

Mitigation:

All mitigation measures discussed in this document shall apply (See Section 6.4 – Discussion of Mitigation Measures, Monitoring, and Reporting Program).

- c. The Project’s potential to result in environmental effects that could adversely affect human beings, either directly or indirectly, has been discussed throughout this document. There are no instances where the proposed project has the potential to result in substantial direct or indirect adverse effects to human beings.

Mitigation:

All mitigation measures discussed in this document shall apply (See Section 6.4 – Discussion of Mitigation Measures, Monitoring, and Reporting Program).

6.4 Discussion of Mitigation Measures, Monitoring, and Reporting Program

The Initial Study found that the project could result in potentially significant adverse impacts unless mitigation measures are required. A list of mitigation that addresses and mitigates potentially significant adverse impacts to a level of non-significance follows.

Biological Resources

The Site is heavily disturbed and actively managed for agricultural production. During the field surveys conducted as part of the SHN Biological Resources Assessment, no special status plant or animal species were documented within the Project area. However, due to the potential presence of nesting birds at the Site, the following mitigation is recommended:

Mitigation Measure BR-1: Preconstruction Bird Surveys

Project-related vegetation management should occur outside the bird nesting season, (February 28 through September 1). If project-related brush clearing must occur during the breeding season, a preconstruction nesting-bird survey shall be conducted by a qualified biologist no more than two weeks prior to Project activities. If active nests are found, a no-disturbance buffer zone of a minimum of 250 feet shall be established. Within this buffer zone, no construction shall take place until September 1 or until the biologist determines that the nest is no longer active.

A Project-specific wetland delineation conducted by SHN did not identify any wetlands within the Project area, but did identify a man-made roadside drainage ditch containing wetland indicators located along the existing access road at the southwest border of the Project Site. The following mitigation measure is recommended to ensure no impacts to potentially jurisdictional waters.

Mitigation Measure BR-2: Protection of Drainage Ditches

Use standard BMPs during ground disturbance activities and remove construction debris and waste from and up to 100 feet around drainage ditches.

Cultural Resources

To address the unlikely event that buried cultural resource deposits are discovered during Project activities, the following mitigation measure is proposed relating to inadvertent discovery procedures:

Mitigation Measure CR-1: Inadvertent Discovery Protocol

If suspected cultural resources, such as lithic materials or ground stone, historic debris, building foundations, or bone are discovered during Project activities, work shall be stopped within 100 feet of the discovery. Contact will be made to the County, a

professional archaeologist and representatives from the Blue Lake Rancheria, Bear River Band of Rohnerville Rancheria, and Wiyot Tribe. The professional historic resource consultant, Tribes and County officials will coordinate provide an assessment of the find and determine the significance and recommend next steps.

If human remains are discovered during Project activities, work will stop at the discovery location, within 100 feet, and any nearby area reasonably suspected to overlie adjacent to human remains (Public Resources Code, Section 7050.5). The Humboldt County coroner will be contacted to determine if the cause of death must be investigated. If the coroner determines that the remains are of Native American origin, it is necessary to comply with state laws relating to the disposition of Native American burials, which fall within the jurisdiction of the NAHC (Public Resources Code, Section 5097). The coroner will contact the NAHC. The descendants or most likely descendants of the deceased will be contacted, and work will not resume until they have made a recommendation to the landowner or the person responsible for the excavation work for means of treatment and disposition, with appropriate dignity, of the human remains and any associated grave goods, as provided in Public Resources Code, Section 5097.98.

Geology and Soils

The following mitigation measure is proposed to address the unlikely event that buried paleontological resources are discovered during Project activities:

Mitigation Measure GEO-1: Inadvertent Discovery Protocol

In the event that paleontological resources are discovered, work shall be stopped within 100 feet of the discovery and a qualified paleontologist shall be notified. The paleontologist shall document the discovery as needed, evaluate the potential resource, and assess the significance of the find under the criteria set forth in State CEQA Guidelines Section 15064.5. If fossilized materials are discovered during construction, excavations within 100 feet of the find shall be temporarily halted or diverted until the discovery is examined by a qualified paleontologist. The paleontologist shall notify the appropriate agency to determine procedures that would be followed before construction is allowed to resume at the location of the find.

Tribal Cultural Resources

To address the unlikely event that buried tribal cultural resource deposits are discovered during Project activities, the following mitigation measure is proposed relating to inadvertent discovery procedures.

Mitigation Measure TCR-1: Inadvertent Discovery Protocol

If suspected tribal cultural resources, such as lithic materials or ground stone, historic debris, building foundations, or bone are discovered during Project activities, work shall

be stopped within 100 feet of the discovery. Contact will be made to the County, a professional archaeologist and representatives from the Blue Lake Rancheria, Bear River Band of Rohnerville Rancheria, and Wiyot Tribe. The professional historic resource consultant, Tribes and County officials will coordinate provide an assessment of the find and determine the significance and recommend next steps.

If human remains are discovered during Project activities, work will stop at the discovery location, within 100 feet, and any nearby area reasonably suspected to overlie adjacent to human remains (Public Resources Code, Section 7050.5). The Humboldt County coroner will be contacted to determine if the cause of death must be investigated. If the coroner determines that the remains are of Native American origin, it is necessary to comply with state laws relating to the disposition of Native American burials, which fall within the jurisdiction of the NAHC (Public Resources Code, Section 5097). The coroner will contact the NAHC. The descendants or most likely descendants of the deceased will be contacted, and work will not resume until they have made a recommendation to the landowner or the person responsible for the excavation work for means of treatment and disposition, with appropriate dignity, of the human remains and any associated grave goods, as provided in Public Resources Code, Section 5097.98.

A Mitigation and Monitoring Report is attached.

6.5 Earlier Analyses

Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, one or more effects have been adequately analyzed in an earlier EIR or negative declaration. Section 16063(c)(3)(D). In this case a discussion should identify the following:

- a) Earlier analyses used. Identify earlier analyses and state where they are available for review.
 1. Humboldt County General Plan & EIR
 2. Humboldt County Zoning Ordinance
 3. CMMLUO and its Mitigated Negative Declaration for Medical Marijuana Land Use Ordinance – Phase IV – Commercial Cultivation of Cannabis for Medical Use

Items 1-3 are available for review at Humboldt County Planning Division.

Earlier analysis has been used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration (CEQA Guidelines Section 15063 (c)(3)(D)).

- b) Impacts Adequately Addressed. Some of the effects from the above checklist were within the scope of and adequately analyzed in the document(s) listed in Section 2.5.a., pursuant to applicable legal standards.

- c) Mitigation Measures. It was not necessary to include mitigation measures, which were incorporated or refined from the document(s) listed in Section 2.5.a to reduce effects that are "Less than Significant with Mitigation Incorporated."

**HUMBOLDT COUNTY PLANNING & BUILDING
DEPARTMENT MITIGATION MONITORING AND
REPORTING PROGRAM**

**Arcata Land Company, LLC, Conditional Use Permit
APNs 506-231-021 and 505-151-011; Record Number: 12255**

Assessor Parcel Numbers: 506-231-021 and 505-151-011

Mitigation measures were incorporated into conditions of project approval for the above referenced project. The following is a list of these measures and a verification form that the conditions have been met. For conditions that require ongoing monitoring, attach the Monitoring Form for Continuing Requirements for subsequent verifications.

MITIGATION MEASURES:

BIOLOGICAL RESOURCES

BR-1: Preconstruction Bird Surveys

Project-related vegetation management should occur outside the bird nesting season, (February 28 through September 1). If project-related brush clearing must occur during the breeding season, a preconstruction nesting-bird survey shall be conducted by a qualified biologist no more than two weeks prior to Project activities. If active nests are found, a no-disturbance buffer zone of a minimum of 250 feet shall be established. Within this buffer zone, no construction shall take place until September 1 or until the biologist determines that the nest is no longer active.

Implementation Time Frame	Monitoring Frequency	Date Verified	To Be Verified By	Compliance Yes No	Comments / Action Taken
If vegetation removal is to occur during the bird nesting season (Feb 28 – Sept 1).	Annually		HCP&BD*		

BR-2: Protection of Drainage Ditches

Use standard BMPs during ground disturbance activities and remove construction debris and waste from and up to 100 feet around drainage ditches.

Implementation Time Frame	Monitoring Frequency	Date Verified	To Be Verified By	Compliance Yes No	Comments / Action Taken

During construction activity and project operations.	Continuous		HCP&BD*		
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Cultural Resources

CR-1: Inadvertent Discovery Protocol

If suspected cultural resources, such as lithic materials or ground stone, historic debris, building foundations, or bone are discovered during Project activities, work shall be stopped within 100 feet of the discovery. Contact will be made to the County, a professional archaeologist and representatives from the Blue Lake Rancheria, Bear River Band of Rohnerville Rancheria, and Wiyot Tribe. The professional historic resource consultant, Tribes and County officials will coordinate provide an assessment of the find and determine the significance and recommend next steps.

If human remains are discovered during Project activities, work will stop at the discovery location, within 100 feet, and any nearby area reasonably suspected to overlie adjacent to human remains (Public Resources Code, Section 7050.5). The Humboldt County coroner will be contacted to determine if the cause of death must be investigated. If the coroner determines that the remains are of Native American origin, it is necessary to comply with state laws relating to the disposition of Native American burials, which fall within the jurisdiction of the NAHC (Public Resources Code, Section 5097). The coroner will contact the NAHC. The descendants or most likely descendants of the deceased will be contacted, and work will not resume until they have made a recommendation to the landowner or the person responsible for the excavation work for means of treatment and disposition, with appropriate dignity, of the human remains and any associated grave goods, as provided in Public Resources Code, Section 5097.98.

Implementation Time Frame	Monitoring Frequency	Date Verified	To Be Verified By	Compliance Yes No	Comments / Action Taken
During construction activity and project operations.	Continuous		HCP&BD*		

Geology and Soils

GEO-1: Inadvertent Discovery Protocol

In the event that paleontological resources are discovered, work shall be stopped within 100 feet of the discovery and a qualified paleontologist shall be notified. The paleontologist shall document the discovery as needed, evaluate the potential resource, and assess the significance of the find under the criteria set forth in State CEQA Guidelines Section 15064.5. If fossilized materials are discovered during construction, excavations within 100 feet of the find shall be temporarily halted or diverted until the discovery is examined by a

qualified paleontologist. The paleontologist shall notify the appropriate agency to determine procedures that would be followed before construction is allowed to resume at the location of the find.

Implementation Time Frame	Monitoring Frequency	Date Verified	To Be Verified By	Compliance Yes No	Comments / Action Taken
During construction activity and project operations.	Continuous		HCP&BD*		

Tribal Cultural Resources

TCR-1: Inadvertent Discovery Protocol

If suspected cultural resources, such as lithic materials or ground stone, historic debris, building foundations, or bone are discovered during Project activities, work shall be stopped within 100 feet of the discovery. Contact will be made to the County, a professional archaeologist and representatives from the Blue Lake Rancheria, Bear River Band of Rohnerville Rancheria, and Wiyot Tribe. The professional historic resource consultant, Tribes and County officials will coordinate provide an assessment of the find and determine the significance and recommend next steps.

If human remains are discovered during Project activities, work will stop at the discovery location, within 100 feet, and any nearby area reasonably suspected to overlie adjacent to human remains (Public Resources Code, Section 7050.5). The Humboldt County coroner will be contacted to determine if the cause of death must be investigated. If the coroner determines that the remains are of Native American origin, it is necessary to comply with state laws relating to the disposition of Native American burials, which fall within the jurisdiction of the NAHC (Public Resources Code, Section 5097). The coroner will contact the NAHC. The descendants or most likely descendants of the deceased will be contacted, and work will not resume until they have made a recommendation to the landowner or the person responsible for the excavation work for means of treatment and disposition, with appropriate dignity, of the human remains and any associated grave goods, as provided in Public Resources Code, Section 5097.98.

Implementation Time Frame	Monitoring Frequency	Date Verified	To Be Verified By	Compliance Yes No	Comments / Action Taken
During construction activity and project operations.	Continuous		HCP&BD*		

* HCP&BD = Humboldt County Planning and Building Department

6.6 Source / Reference List

The following documents were used in the preparation of this Initial Study:

Angeloff, Nick. Archaeological Research and Supply Company. "A Cultural Resource Investigation Report of the Arcata ALC Property." May 2018 (Updated June 2020).

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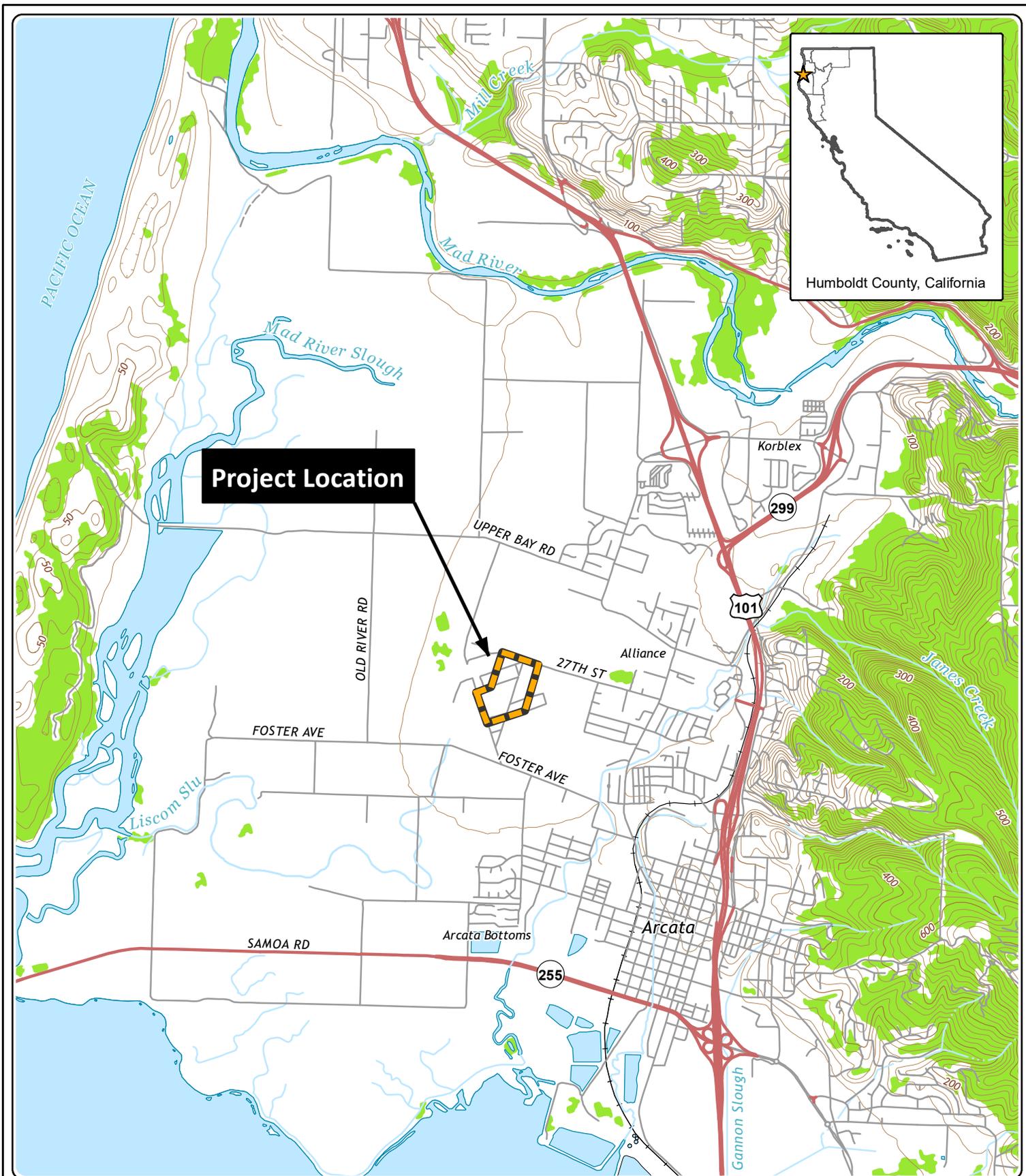
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Legend:

 Site Boundary

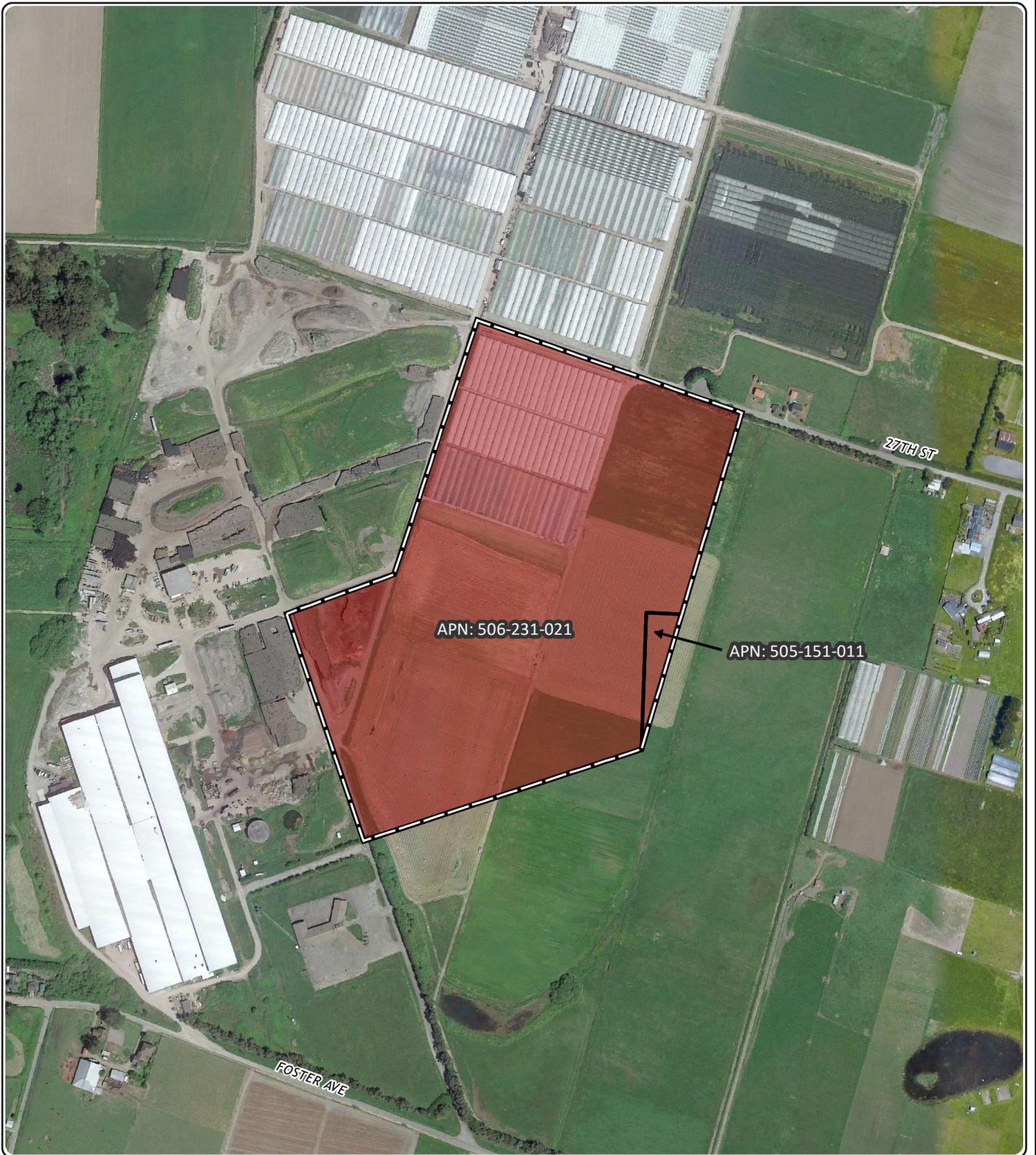


Site and Vicinity Map
Commercial Cannabis Outdoor and
Mixed-Light Cultivation Project (App 12255)
 Arcata Land Company LLC
 Humboldt County, California

Figure 1 **10/19/2020**

Disclaimer: The data was mapped for planning purposes only. No liability is assumed for accuracy of the data shown.

COMPASS LAND
 GROUP



Aerial photo adapted from Google Earth Maps Imagery Date 5/27/2016.
 Parcels mapped per Plot Plan & Survey by Kelly O'Hern Associates, March 2020.
 Humboldt County GIS Zoning. Humboldt County Building & Planning, 04/13/2020. Accessed Online.

Legend:

-  Site Boundary
-  County Parcel
-  Heavy Industrial Zoning

0 300 600 Feet 

Parcel and Zoning Map
Commercial Cannabis Outdoor and
Mixed-Light Cultivation Project (App 12255)
 Arcata Land Company LLC
 Humboldt County, California

Figure 2

10/28/2020

Disclaimer: The data was mapped for planning purposes only. No liability is assumed for accuracy of the data shown.





Aerial photo adapted from Google Earth Maps Imagery Date 5/27/2016.
 Parcel D mapped per Plot Plan & Survey by Kelly O'Hern Associates. March 2020.

Legend:

 Site Boundary

0 300 600 Feet 

Existing Conditions Site Map
 Commercial Cannabis Outdoor and
 Mixed-Light Cultivation Project (App 12255)
 Arcata Land Company LLC
 Humboldt County, California

Figure 3 10/28/2020

Disclaimer: The data was mapped for planning purposes only. No liability is assumed for accuracy of the data shown.

COMPASS LAND
 GROUP



Aerial photo adapted from Google Earth Maps Imagery Date 5/27/2016.
 Geology of the Cape of Mendocino, Eureka, Garberville, and Southwestern part of Hayfork. Sheet 1 Eureka. R.J. McLaughlin et al. USGS. 2000. Accessible Online. ngmdb.usgs.gov

Legend:

-  Site Boundary
-  Qal - Quaternary Alluvium

0 300 600 Feet 

Site Geology Map
Commercial Cannabis Outdoor and
Mixed-Light Cultivation Project (App 12255)
Arcata Land Company LLC
Humboldt County, California

Figure 4	10/28/2020
Disclaimer: The data was mapped for planning purposes only. No liability is assumed for accuracy of the data shown.	
	



Aerial photo adapted from Google Earth Maps Imagery Date 5/27/2016.
 Humboldt County Community Development Services, Humboldt County Agricultural Land Soils, 2001. Accessible Online.

Legend:

- Site Boundary
- 127 - Jollygiant, 0 to 2 percent slopes
- 210 - Dungan, 0 to 2 percent slopes

0 300 600 Feet

NRCS Soils Map
Commercial Cannabis Outdoor and
Mixed-Light Cultivation Project (App 12255)
 Arcata Land Company LLC
 Humboldt County, California

Figure 5	10/28/2020
Disclaimer: The data was mapped for planning purposes only. No liability is assumed for accuracy of the data shown.	



Aerial photo adapted from Google Earth Maps Imagery Date 5/27/2016.
 Humboldt County Community Development Services, Humboldt County Agricultural Land Soils, 2001. Accessible Online.

Legend:

-  Site Boundary
-  Ba7 - silty clay loam
-  Fe2 - silt loam

0 300 600 Feet 

Humboldt County Prime Agricultural Soils
 Commercial Cannabis Outdoor and
 Mixed-Light Cultivation Project (App 12255)
 Arcata Land Company LLC
 Humboldt County, California

Figure 6 10/28/2020

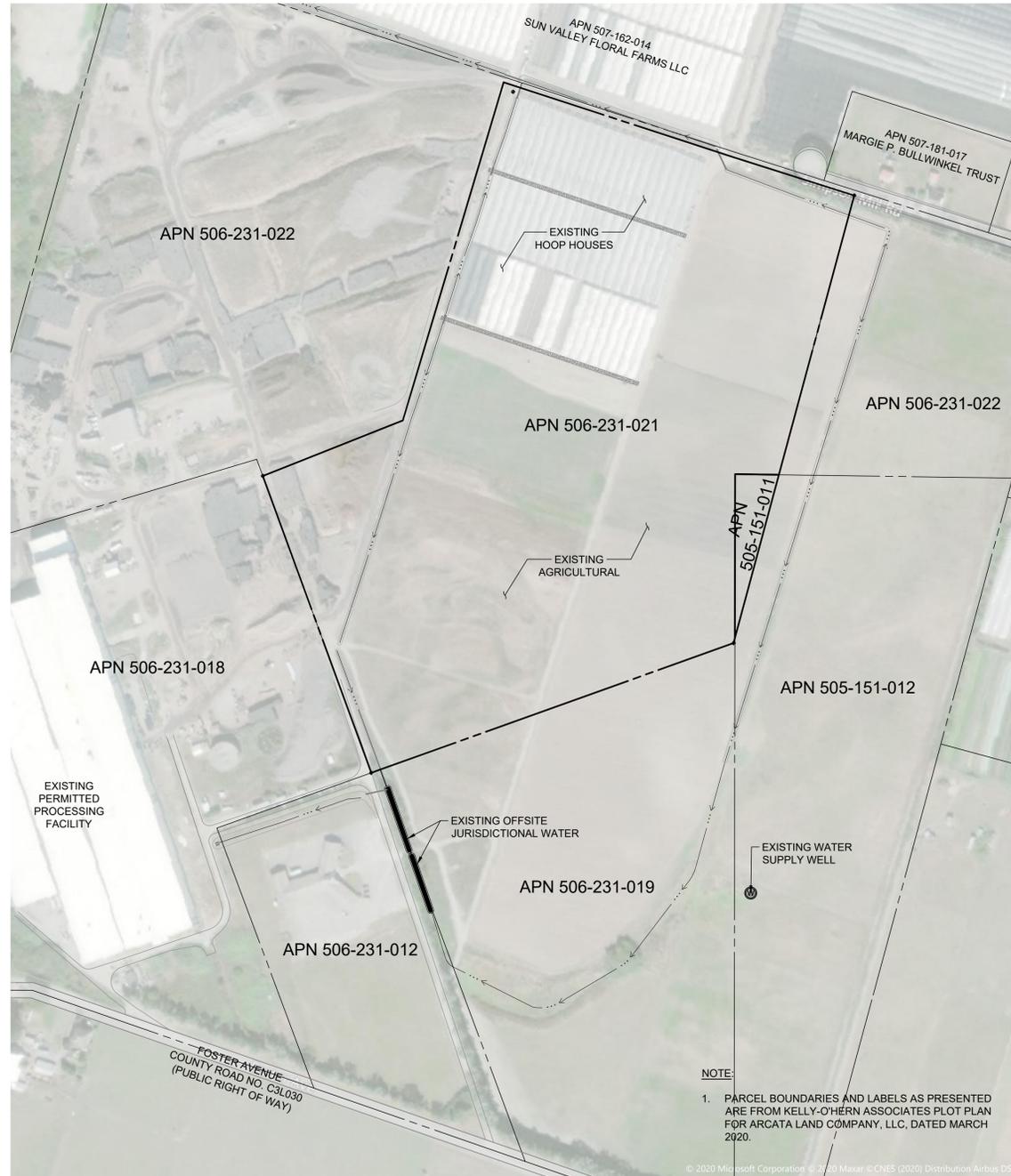
Disclaimer: The data was mapped for planning purposes only. No liability is assumed for accuracy of the data shown.

COMPASS LAND
 GROUP

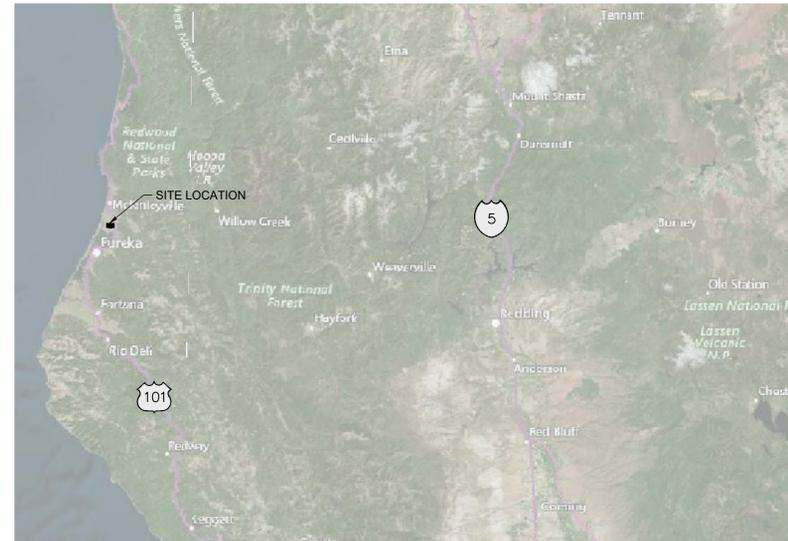
ARCATA LAND COMPANY, LLC COMMERCIAL CANNABIS OUTDOOR LIGHT DEPRIVATION AND MIXED-LIGHT CULTIVATION PROJECT SITE PLAN

3318 FOSTER AVENUE
ARCATA, CA 95521

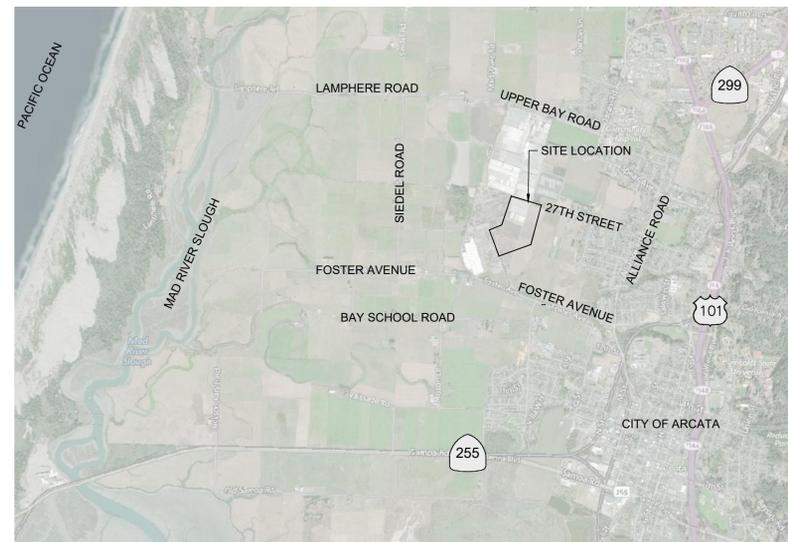
Sheet List Table	
Sheet Number	Sheet Title
C1.0	COVER SHEET
C2.0	EXISTING CONDITIONS
C3.0	SITE AND UTILITY PLAN - OVERVIEW
C3.1	SITE AND UTILITY PLAN - AREA 1
C3.2	SITE AND UTILITY PLAN - AREA 2
C3.3	SITE AND UTILITY PLAN - AREA 3
C3.4	SITE AND UTILITY PLAN - AREA 4 AND 5
C4.0	DETAILS - HOOP HOUSES
C4.1	DETAILS - DETENTION BASINS
C4.2	DETAILS - DRAINAGE STRUCTURES
C4.3	DETAILS - BUILDINGS
C5.0	LIGHTING PLAN
C5.1	LIGHTING DETAILS



EXISTING CONDITIONS SITE MAP
1" = 200'-0"



SITE LOCATION
NTS



SITE VICINITY
NTS

APPLICANT/OWNER

ARCATA LAND COMPANY, LLC
3318 FOSTER AVENUE
ARCATA, CA 95521
CONTACT: LANE DEVRIES

SITE INFORMATION

APNS: 505-151-011 AND 506-231-021
SECTIONS 19, 20, 29, & 30 T6N, R1E, HUMBOLDT MERIDIAN,
UNINCORPORATED HUMBOLDT COUNTY
ZONING: MH-Q (HEAVY INDUSTRIAL, QUALIFIED COMBINING ZONE)
ADDRESS: 3318 FOSTER AVENUE, ARCATA, CA 95521
LOT SIZE: 38.2 AC

PRELIMINARY EARTHWORK

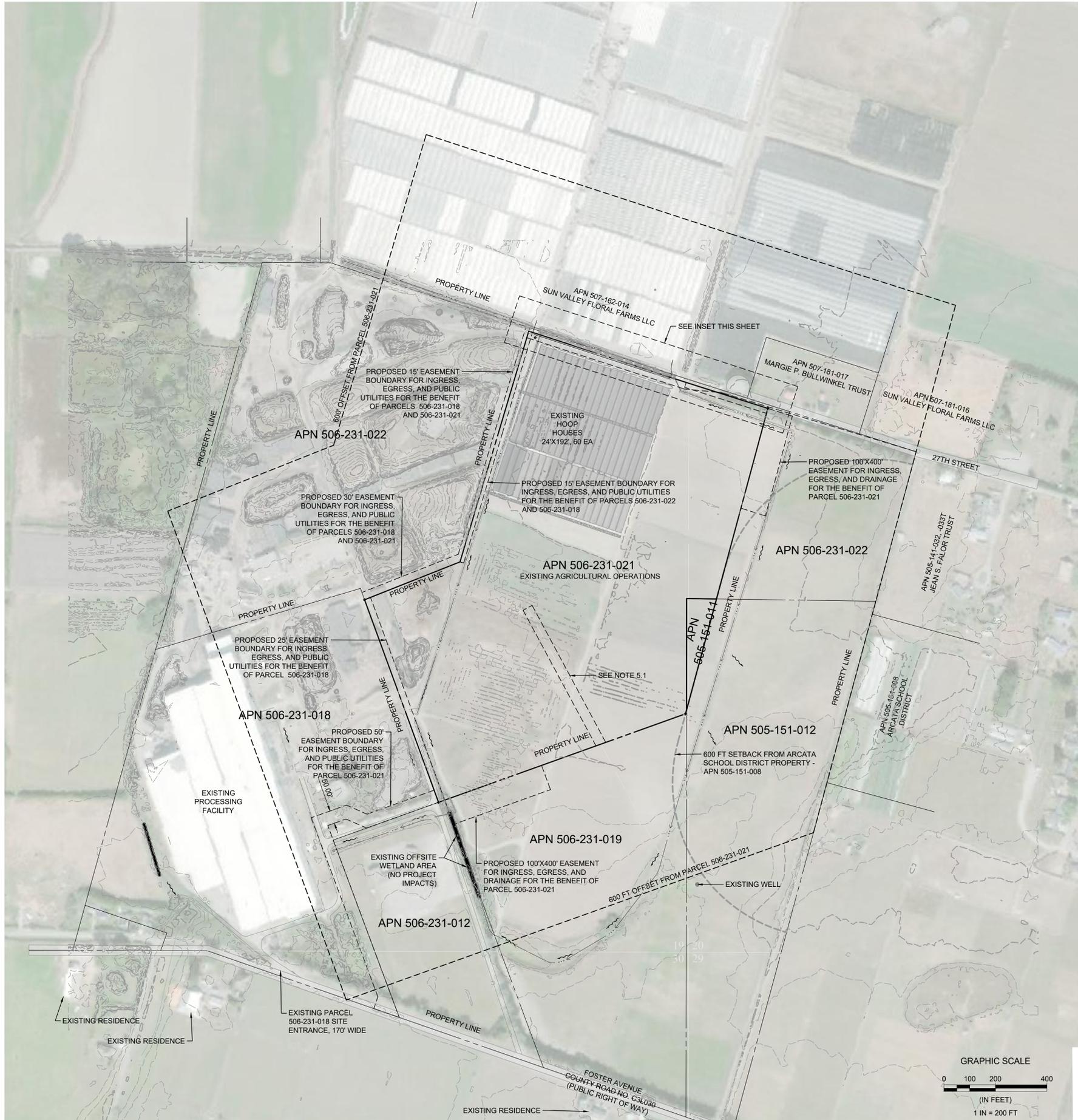
AREA OF DISTURBANCE: 33.1 AC
CUT: 18,586 CY
FILL: 46,586 CY (37,640 CY SAND/SOIL FILL FOR HOOP HOUSE AREAS)
MAX DEPTH CUT: 5.9'

SITE IMPROVEMENTS

- BUILDINGS**
HOOP HOUSES AREA 1: 6.2 AC
HOOP HOUSES AREA 2: 3.9 AC
HOOP HOUSES AREA 3: 4.3 AC
INCLUDES 1.2 AC OF MOTHER HOOP HOUSES
HOOP HOUSES AREA 4: 8.5 AC
INCLUDES 0.6 AC OF STARTS AND 3.4 AC OF MIXED-LIGHT
ADMINISTRATION BUILDING: 21,000 SF
PROPAGATION AND OFFICE BUILDING: 39,500 SF
UTILITY BUILDING: 1,600 SF
- PARKING AND LOADING**
(3) ADA STALLS (1 VAN ACCESSIBLE)
(116) STANDARD STALLS
(4) LOADING STALLS
IN ACCORDANCE WITH HUMBOLDT COUNTY CODE TITLE III DIVISION 1 CH 4 SECTION 314-109
- PAVEMENT SURFACES**
CONCRETE: 40,500 SF
- STORMWATER DETENTION**
BASIN 1 STORAGE CAPACITY: 0.50 AF
BASIN 2 STORAGE CAPACITY: 0.33 AF
- WATER STORAGE**
WATER STORAGE TANK: 100,000 GALLONS

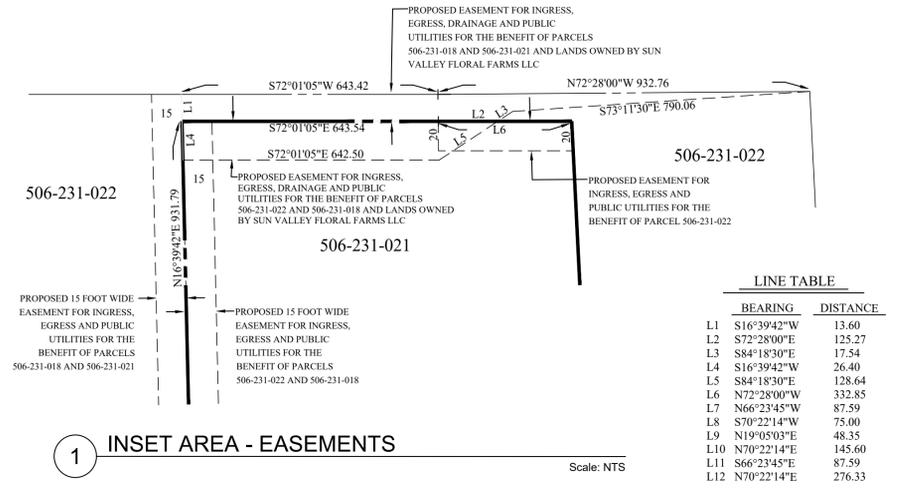
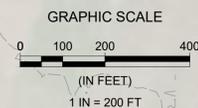
ARCATA LAND COMPANY, LLC
3318 FOSTER AVENUE, ARCATA, CA
COVER SHEET C1.0





1 EXISTING CONDITIONS

Scale: 1:200



1 INSET AREA - EASEMENTS

Scale: NTS

NOTE:

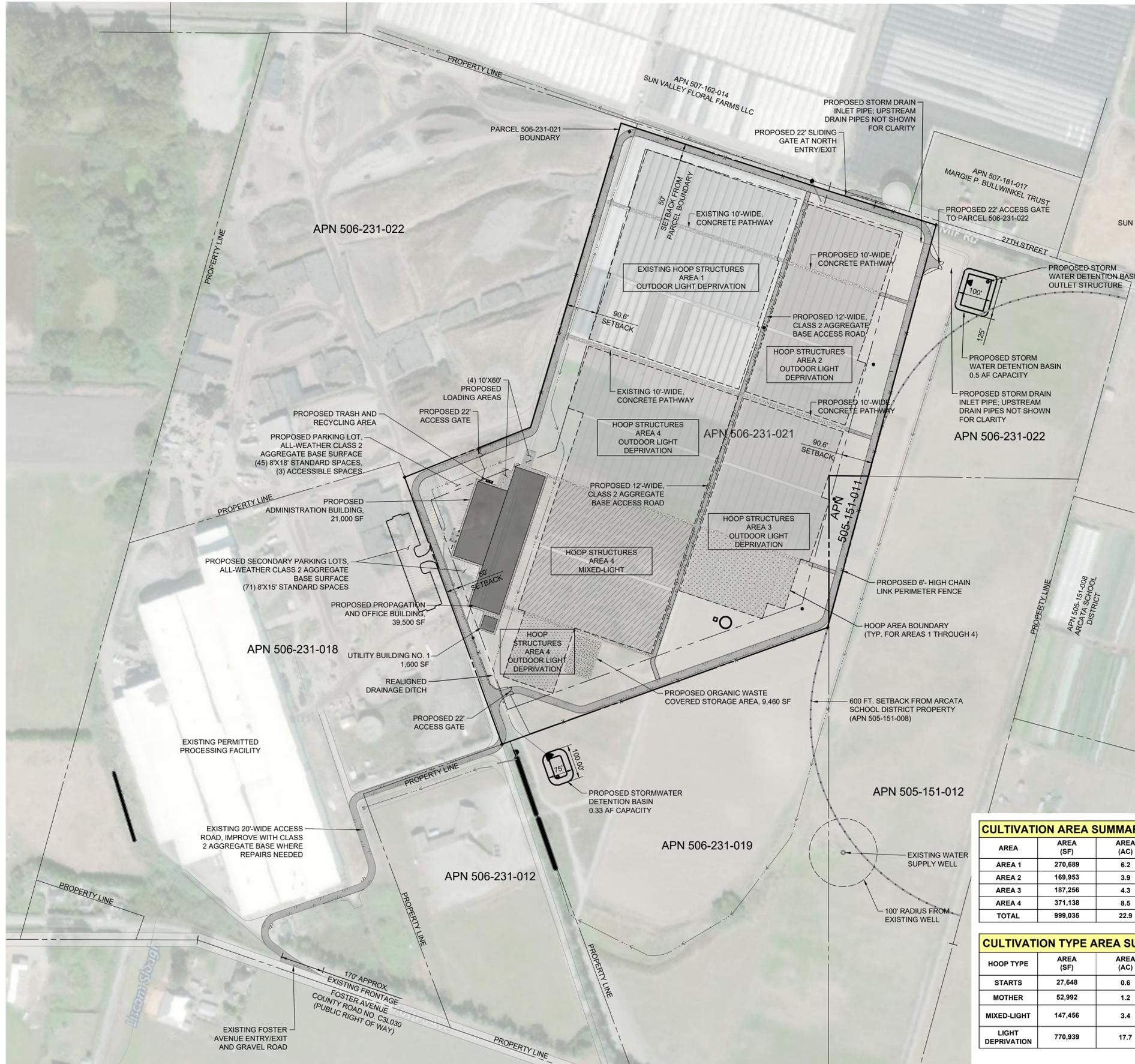
- THE PROPERTY LINES SHOWN ON THIS PLOT PLAN ARE BASED ON BOOK 74 OF SURVEYS, PAGES 137 & 138. APNS WERE ASSIGNED AFTER A LOT LINE ADJUSTMENT COMPLETED IN MAY 2020.
- BASIS OF BEARINGS: BOOK 74 OF SURVEYS, PAGES 137 & 138.
- ACCORDING TO FLOOD INSURANCE RATE MAP NO. 06023C0690F, WITH A DATE OF IDENTIFICATION OF NOVEMBER 4, 2016, FOR COMMUNITY NUMBER 060080 IN HUMBOLDT COUNTY, STATE OF CALIFORNIA, A PORTION OF THE SUBJECT PROPERTY IS LOCATED WITHIN FLOOD ZONE A (WITHIN A 100-YEAR FLOOD ZONE) AND A PORTION IS LOCATED WITHIN FLOOD ZONE X (AREAS OF MINIMAL FLOODING). THE APPROXIMATE LOCATION OF THE LINE BETWEEN ZONE A AND ZONE X HAS BEEN LOCATED PER SAID FLOOD INSURANCE RATE MAP NO. 06023C0690F.
- BASED ON FEMA CASE NO. 98-09-088A, REVALIDATED BY CASE NO. 11-09-0847V EFFECTIVE JUNE 22, 2017, ARCATA LAND COMPANY PARCELS ARE NOW IN ZONE X, OUTSIDE OF ZONE A.
- DIRECTIONS OF RUNOFF ARE PER AERIAL MAPPING AND ARE APPROXIMATE.
- THE EXISTING PROPERTY MAY BE ENCUMBERED BY THE FOLLOWING RECORDED INSTRUMENTS:
 - BOOK 251 DEEDS, PAGE 372 - EASEMENT GRANTED TO PACIFIC GAS AND ELECTRIC COMPANY FOR PUBLIC UTILITIES - SHOWN HEREON. EASEMENT WILL BE ELIMINATED WITHIN THE BOUNDARY OF 506-231-021.
- NO MAJOR VEGETATION REMOVAL PROPOSED.
- THERE ARE NO SCHOOLS, SCHOOL BUS STOPS, PLACES OF WORSHIP, PUBLIC PARKS, OR TRIBAL CULTURAL RESOURCES WITHIN 600 FEET OF THE CULTIVATION SITE.
- THERE ARE NO JURISDICTIONAL WATERS WITHIN THE PROJECT BOUNDARY PER THE WETLANDS AND OTHER WATERS DELINEATION REPORT PREPARED BY SHN ENGINEERS (JUNE 2020).
- ACCESS TO THE SUBJECT PROPERTY IS VIA A PROPOSED EASEMENT ACROSS PARCEL 506-231-018 FROM FOSTER AVENUE, SHOWN HEREON. FOSTER AVENUE IS A COUNTY MAINTAINED AD WITH AN ASPHALT-PAVED ROAD SURFACE OF 20 FEET IN WIDTH, WITH A GRADUAL GRADE.
- WATER SOURCE IS AN EXISTING AGRICULTURAL WELL LOCATED ON PARCEL 505-151-012 TO THE SOUTH OWNED BY ARCATA LAND COMPANY AS SHOWN HEREON.
- THERE ARE NO WATER DIVERSIONS ON THE SUBJECT PROPERTY.
- MH ZONING REQUIRES 50' SETBACKS FROM THE FRONT AND REAR PARCEL BOUNDARIES; SIDE SETBACKS ARE SET AT 10% OF THE AVERAGE LOT WIDTH (HUMBOLDT COUNTY LAND USE REGULATIONS TITLE III, DIVISION 1, CHAPTER 4, SECTION 314-3.3). FOR THIS PARCEL, THIS SETBACK IS CALCULATED AS 90.6'.
- NO STORAGE OF FERTILIZERS, PESTICIDES, OR HAZARDOUS MATERIALS WILL OCCUR ON PARCEL 506-231-021. ALL STORAGE WILL OCCUR ON AN ADJACENT PARCEL OWNED BY ARCATA LAND COMPANY, LLC.

LEGEND:

	DESCRIPTION
— x —	PERIMETER SECURITY FENCE
—	GRADING LIMITS
- - -	PARCEL BOUNDARY
- - - -	SETBACK BOUNDARY
- - - - -	EASEMENT BOUNDARY
—	FLOW LINE
—	OVERHEAD WIRE (EXISTING)
—	OVERHEAD WIRE (PROPOSED)
—	WATER LINE (EXISTING)
—	WATER LINE (PROPOSED)
—	SANITARY SEWER LINE (EXISTING)
—	SANITARY SEWER LINE (PROPOSED)
—	STORM DRAIN LINE (EXISTING)
—	STORM DRAIN LINE (PROPOSED)
—	GAS LINE (EXISTING)
—	GAS LINE (PROPOSED)
—	GENERALIZED SURFACE FLOW DIRECTION
•	MONUMENT
⊙	EXISTING TREE
⊙	EXISTING HYDRANT
⊙	EXISTING POWER POLE
□	LIMITS OF ALL-WEATHER SURFACE
□	GREENHOUSE CULTIVATION AREA
■	BUILDING

ARCATA LAND COMPANY, LLC
 3318 FOSTER AVENUE, ARCATA, CA
 EXISTING CONDITIONS
 SHEET C2.0





(A) KEY PLAN

Scale: 1:500

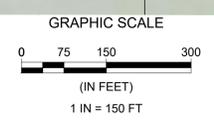
LEGEND:	
DESCRIPTION	
PERIMETER SECURITY FENCE, 6' HEIGHT	x
GRADING LIMITS	---
PARCEL BOUNDARY	---
SETBACK BOUNDARY	---
EASEMENT BOUNDARY	---
FLOW LINE	---
OVERHEAD WIRE (EXISTING)	---
OVERHEAD WIRE (PROPOSED)	---
WATER LINE (EXISTING)	---
WATER LINE (PROPOSED)	---
SANITARY SEWER LINE (EXISTING)	---
SANITARY SEWER LINE (PROPOSED)	---
STORM DRAIN LINE (EXISTING)	---
STORM DRAIN LINE (PROPOSED)	---
GAS LINE (EXISTING)	---
GAS LINE (PROPOSED)	---
GENERALIZED SURFACE FLOW DIRECTION	---
MONUMENT	•
EXISTING TREE	---
EXISTING HYDRANT	---
EXISTING POWER POLE	---
LIMITS OF ALL-WEATHER SURFACE	---
HOOP HOUSE CULTIVATION AREA AND HOOP HOUSE DESIGNATION NUMBER	37
MIXED-LIGHT HOOP HOUSE	---
MOTHER PLANT HOOP HOUSE	---
STARTS HOOP HOUSE	---
BUILDING	---

CULTIVATION AREA SUMMARY:

AREA	AREA (SF)	AREA (AC)	192' LONG HOOP HOUSE	177' LONG HOOP HOUSE	144' LONG HOOP HOUSE	TOTAL HOOP HOUSE COUNT
AREA 1	270,689	6.2	36	18	0	54
AREA 2	169,953	3.9	23	11	0	34
AREA 3	187,256	4.3	35	0	2	37
AREA 4	371,138	8.5	72	0	0	72
TOTAL	999,035	22.9	166	29	2	197

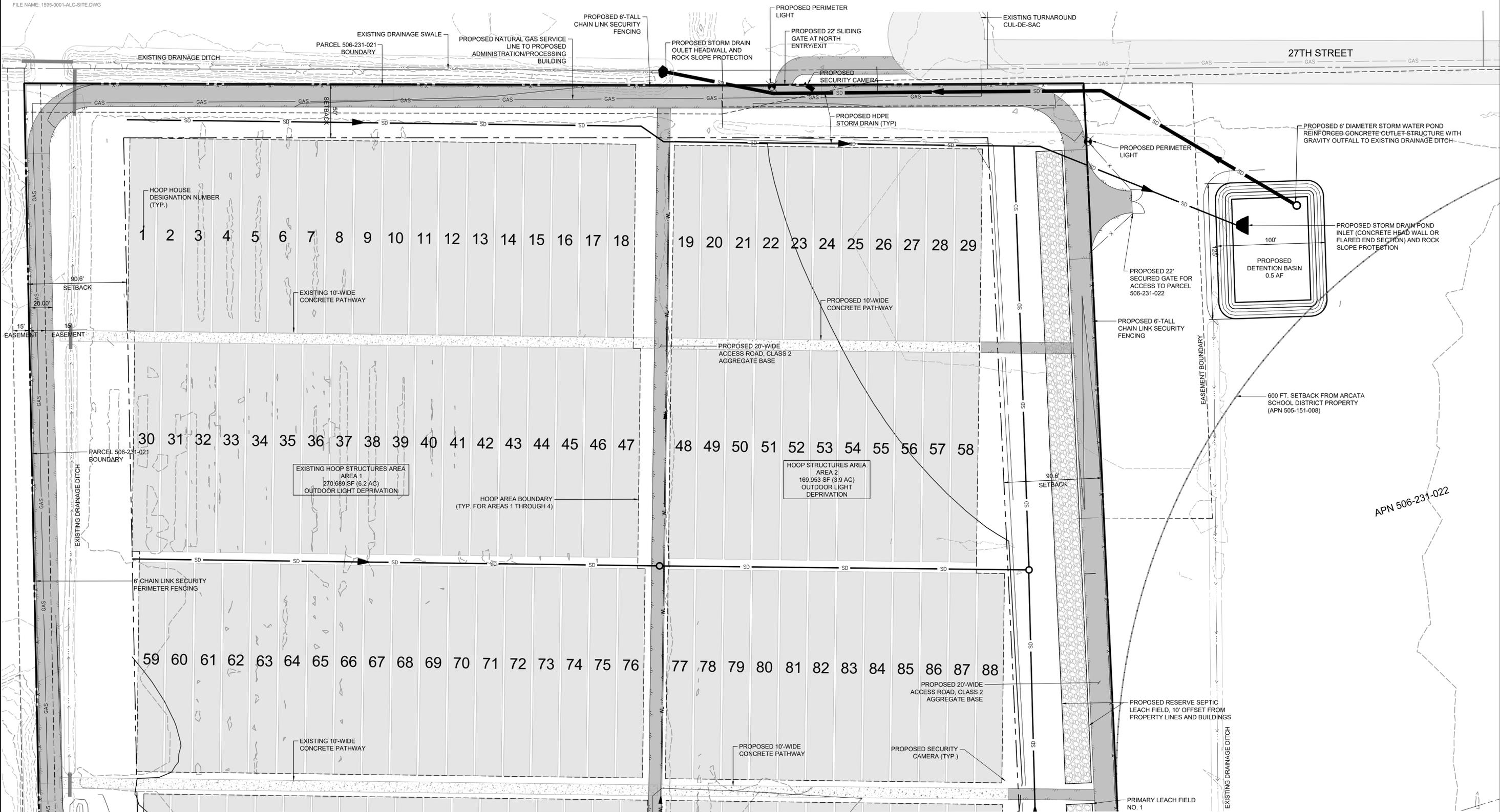
CULTIVATION TYPE AREA SUMMARY:

HOOP TYPE	AREA (SF)	AREA (AC)	LOCATION	HOOP NOS.
STARTS	27,648	0.6	AREA 4	192 - 197
MOTHER	52,992	1.2	AREA 3	164 - 175
MIXED-LIGHT	147,456	3.4	AREA 4	148 - 163 176 - 191
LIGHT DEPRIVATION	770,939	17.7	AREAS 1-4	1-147



ARCATA LAND COMPANY, LLC
 3318 FOSTER AVENUE, ARCATA, CA
 SITE AND UTILITY PLAN
 SHEET C3.0





27TH STREET

HOOP HOUSE DESIGNATION NUMBER (TYP.)

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18

19 20 21 22 23 24 25 26 27 28 29

30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47

48 49 50 51 52 53 54 55 56 57 58

59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76

77 78 79 80 81 82 83 84 85 86 87 88

EXISTING HOOP STRUCTURES AREA AREA 1 270,689 SF (6.2 AC) OUTDOOR LIGHT DEPRIVATION

HOOP STRUCTURES AREA AREA 2 169,953 SF (3.9 AC) OUTDOOR LIGHT DEPRIVATION

HOOP AREA BOUNDARY (TYP. FOR AREAS 1 THROUGH 4)

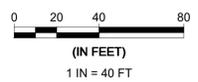
600 FT. SETBACK FROM ARCATA SCHOOL DISTRICT PROPERTY (APN 505-151-008)

APN 506-231-022

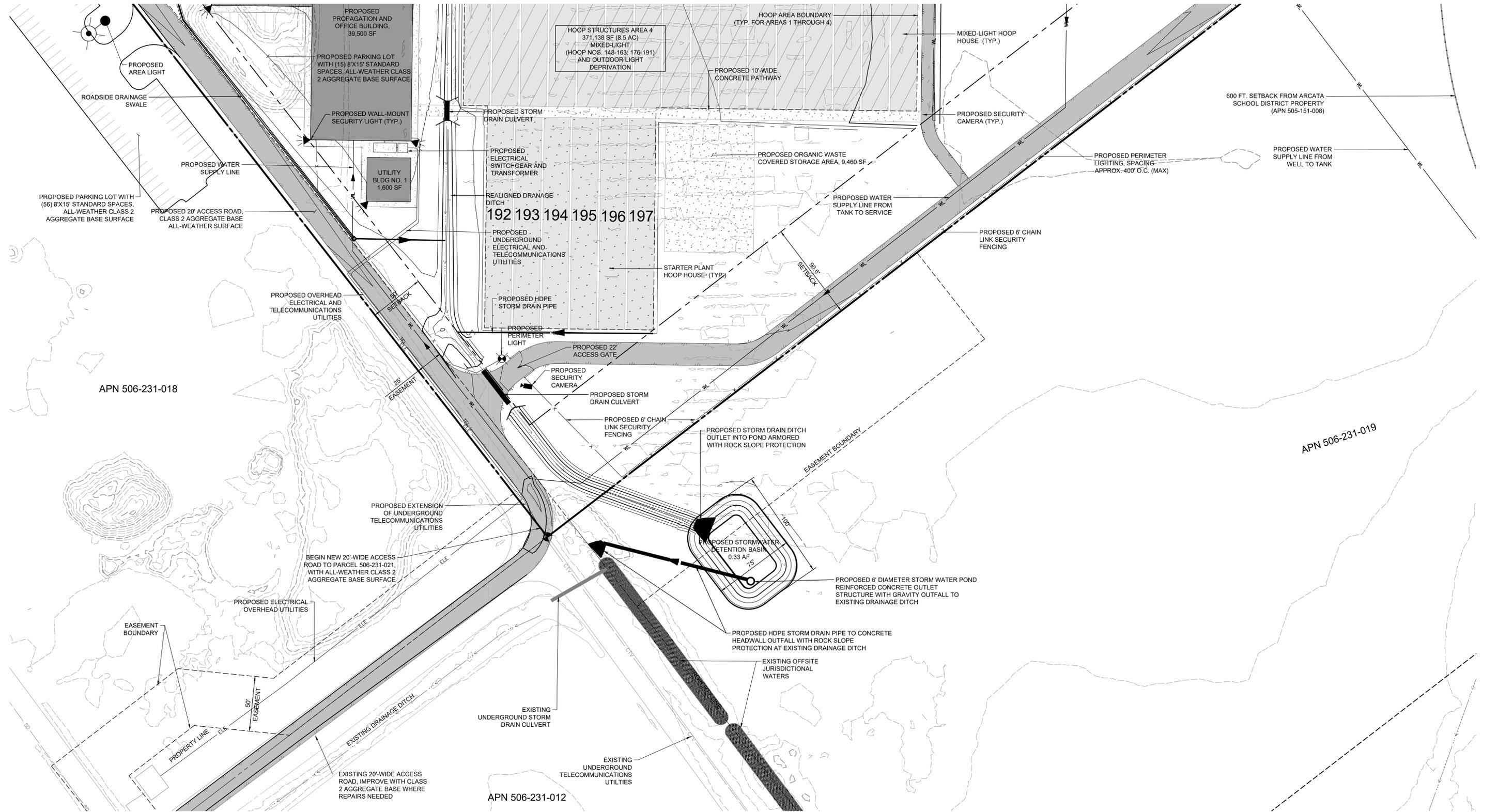
PRIMARY LEACH FIELD NO. 1

ARCATA LAND COMPANY, LLC
3318 FOSTER AVENUE, ARCATA, CA
SITE AND UTILITY PLAN - AREA 1
SHEET C3.1

GRAPHIC SCALE



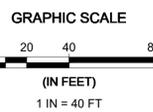
CIVIL AND TRANSPORTATION ENGINEERING
CONSTRUCTION MANAGEMENT
LANDSCAPE ARCHITECTURE
MECHANICAL ENGINEERING
PLANNING
PUBLIC WORKS ADMINISTRATION
SURVEYING / GIS SOLUTIONS
WATER RESOURCES



APN 506-231-018

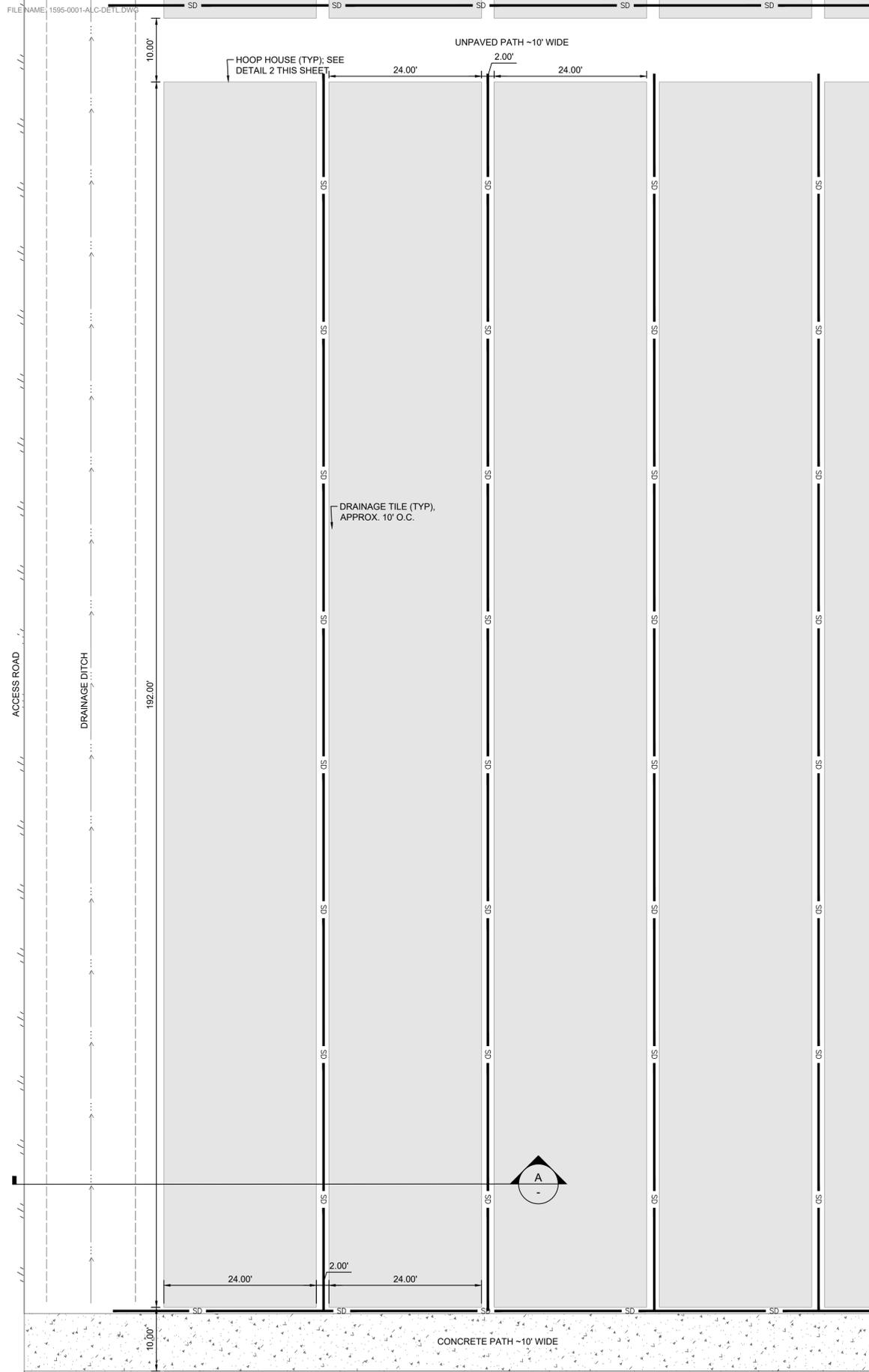
APN 506-231-019

APN 506-231-012

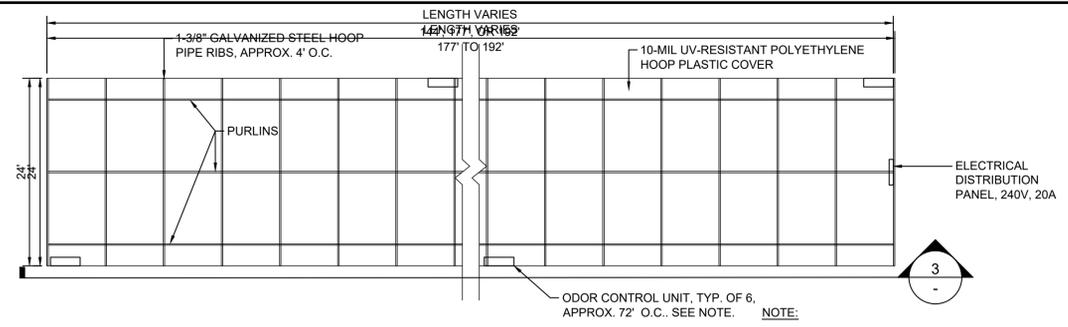


ARCATA LAND COMPANY, LLC
 3318 FOSTER AVENUE, ARCATA, CA
 SITE AND UTILITY PLAN - AREA 3
 SHEET C3.3



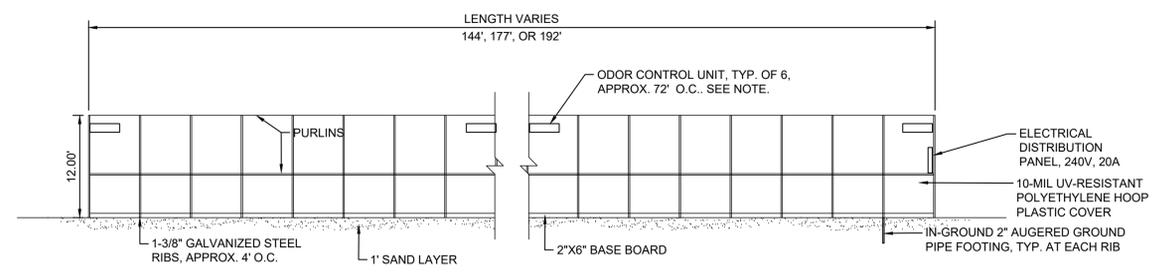


1 EXISTING HOOP HOUSE AND SUBDRAIN LAYOUT
Scale: 1:10



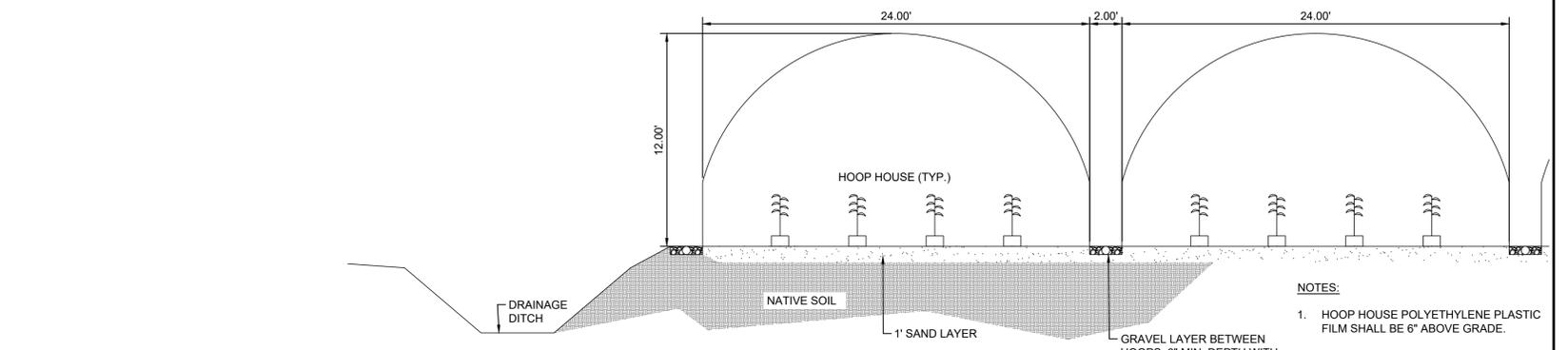
2 PROPOSED HOOP DETAIL - PLAN
Scale: NTS

- NOTE:
- ODOR CONTROL SHALL BE PROVIDED THROUGH CARBON BASED AIR FILTERS. HOOP HOUSE AIR VOLUME RANGES FROM 37,200 TO 49,500 CF ODOR FLOW CONTROL UNITS SHALL BE SIZED TO TREAT A TOTAL OF 3 AIR VOLUMES PER HOUR.



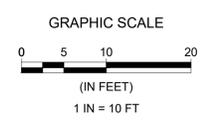
3 PROPOSED HOOP DETAIL - SECTION
Scale: NTS

- NOTE:
- HOOP HOUSE POLYETHYLENE PLASTIC FILM SHALL BE 6" ABOVE GRADE.
 - THE PLASTIC COVERING FOR THE MIXED-LIGHT HOOP HOUSES WILL BE INCLUDE A BLACK-OUT PLASTIC/FABRIC TO PREVENT LIGHT FROM ESCAPING AT NIGHT.
 - ODOR CONTROL SHALL BE PROVIDED THROUGH CARBON BASED AIR FILTERS. HOOP HOUSE AIR VOLUME RANGES FROM 37,200 TO 49,500 CF ODOR FLOW CONTROL UNITS SHALL BE SIZED TO TREAT A TOTAL OF 3 AIR VOLUMES PER HOUR.



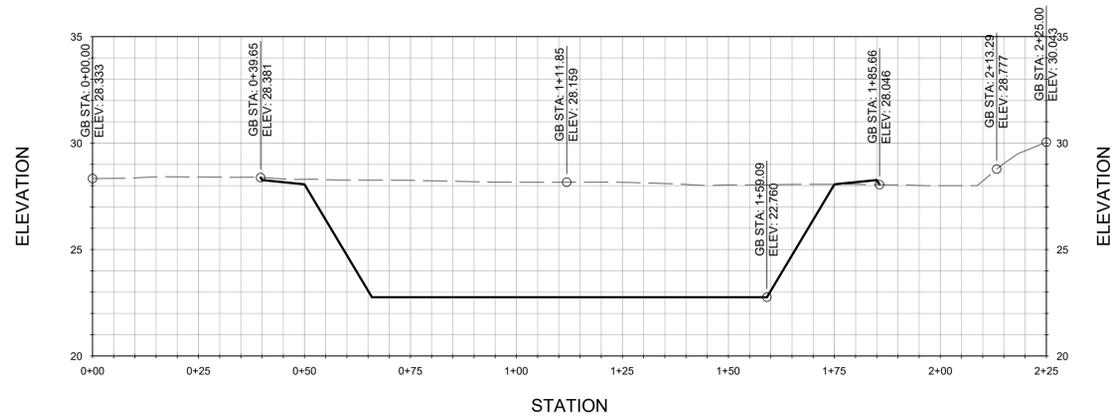
A HOOP ELEVATION
Scale: 1:5

- NOTES:
- HOOP HOUSE POLYETHYLENE PLASTIC FILM SHALL BE 6" ABOVE GRADE.
 - DRIP IRRIGATION RUNS THROUGH THE CENTER OF ROW CROPS.

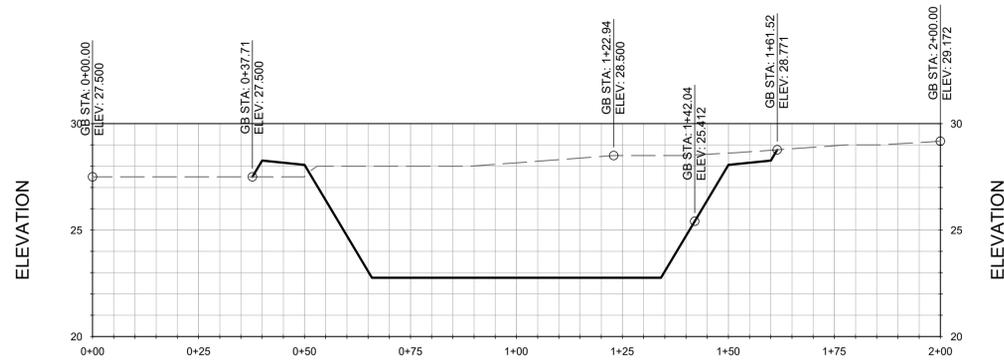


ARCATA LAND COMPANY, LLC
3318 FOSTER AVENUE, ARCATA, CA
DETAILS - HOOP HOUSES
SHEET C4.0

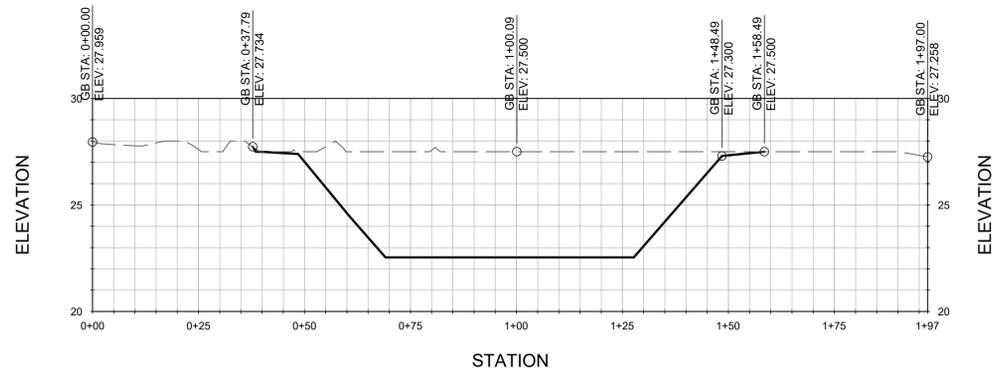




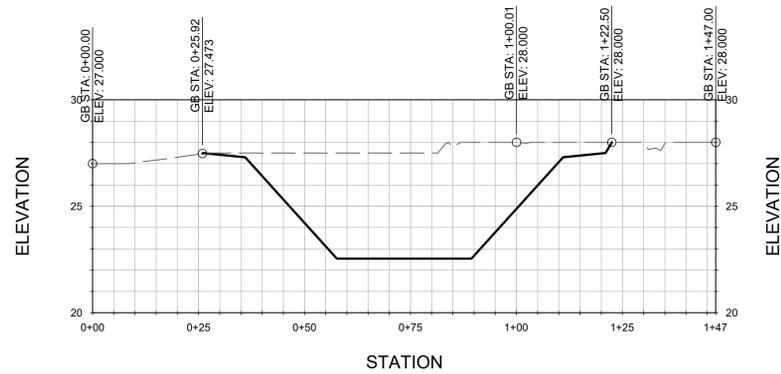
1 STORMWATER DETENTION BASIN NO. 1 NORTH-SOUTH SECTION
Scale: HORIZ 1:20; VERT 1:4



2 STORMWATER DETENTION BASIN NO. 1 EAST-WEST SECTION
Scale: HORIZ 1:20; VERT 1:4



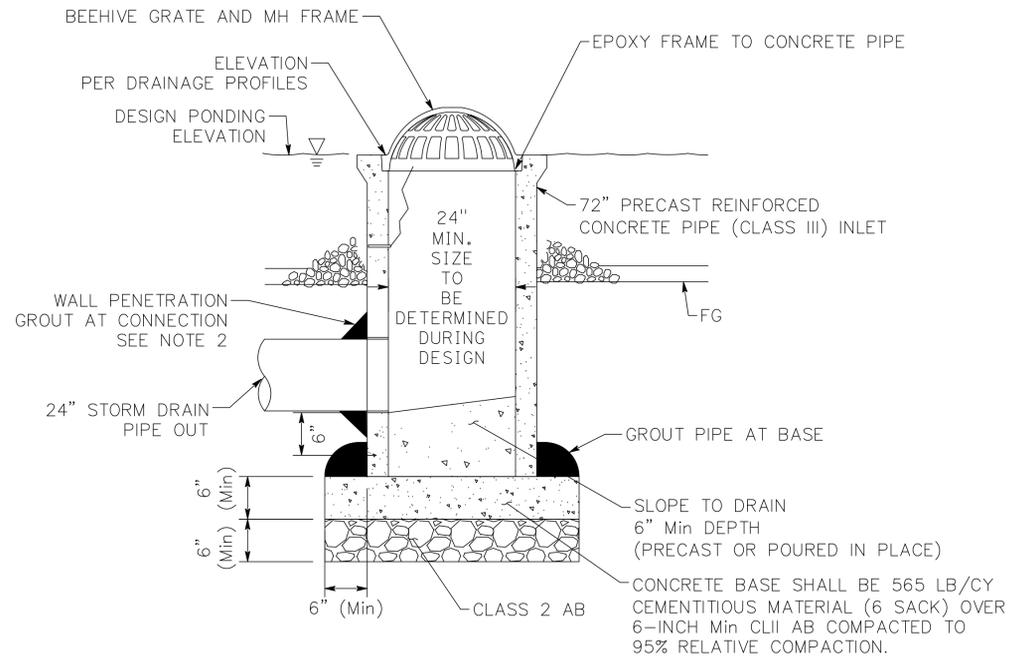
3 STORMWATER DETENTION BASIN NO. 2 NORTH-SOUTH SECTION
Scale: HORIZ 1:20; VERT 1:4



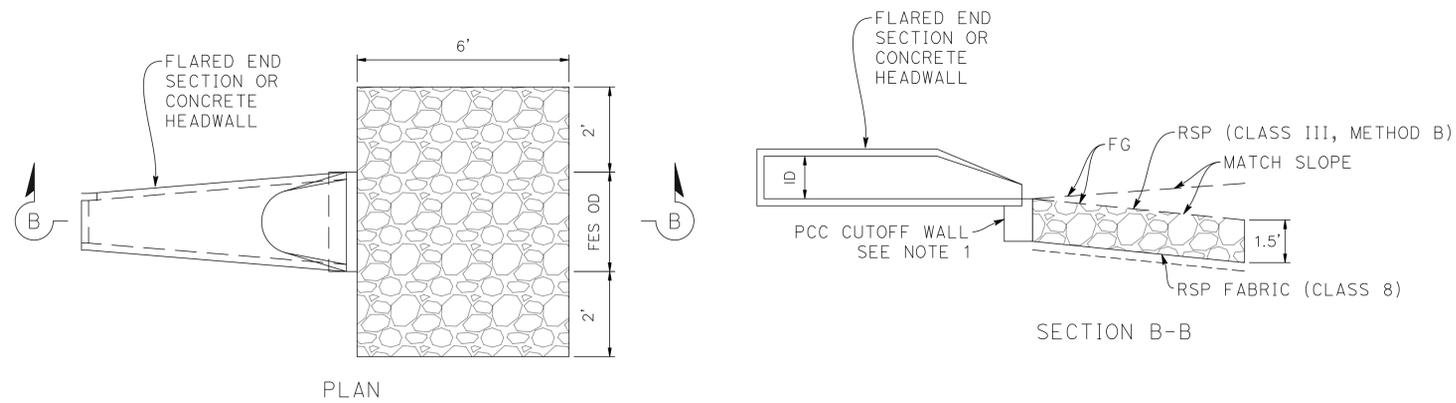
4 STORMWATER DETENTION BASIN NO. 2 EAST-WEST SECTION
Scale: HORIZ 1:20; VERT 1:4

ARCATA LAND COMPANY, LLC
3318 FOSTER AVENUE, ARCATA, CA
DETAILS - DETENTION BASINS
SHEET C4.1





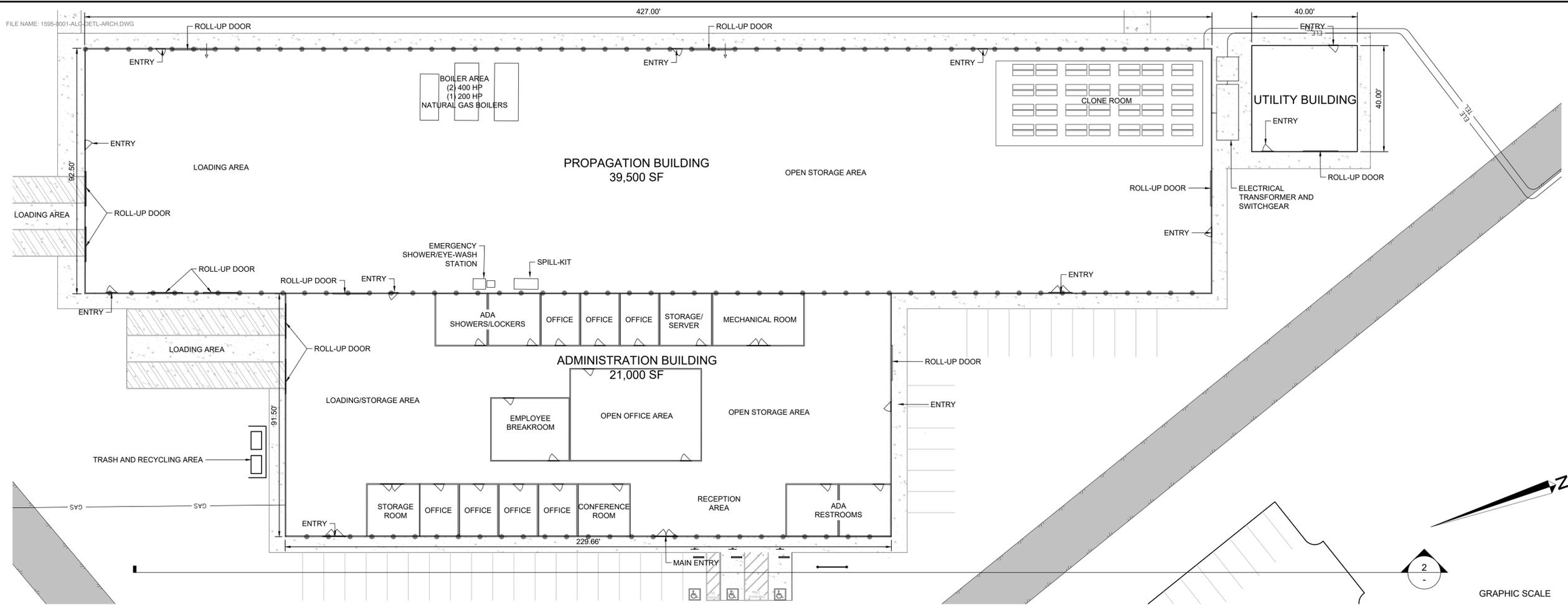
1 DETENTION POND OVERFLOW STRUCTURE
Scale: NTS



2 STORM DRAIN OUTFALL DETAIL
Scale: NTS

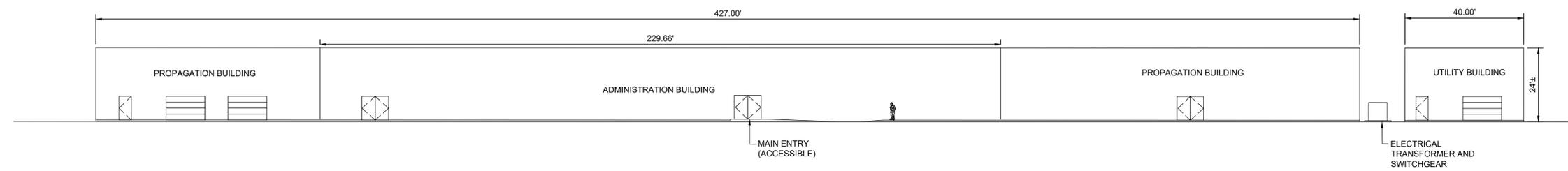
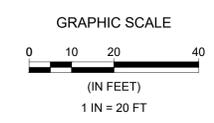
ARCATA LAND COMPANY, LLC
3318 FOSTER AVENUE, ARCATA, CA
DETAILS - DRAINAGE STRUCTURES
SHEET C4.2





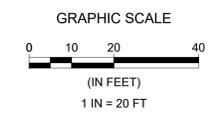
1 BUILDING LAYOUT

Scale: 1" = 20'-0"



2 BUILDING ELEVATION

Scale: 1" = 20'-0"

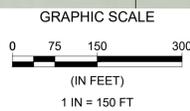


ARCATA LAND COMPANY, LLC
 3318 FOSTER AVENUE, ARCATA, CA
 DETAILS - BUILDINGS
 SHEET C4.3



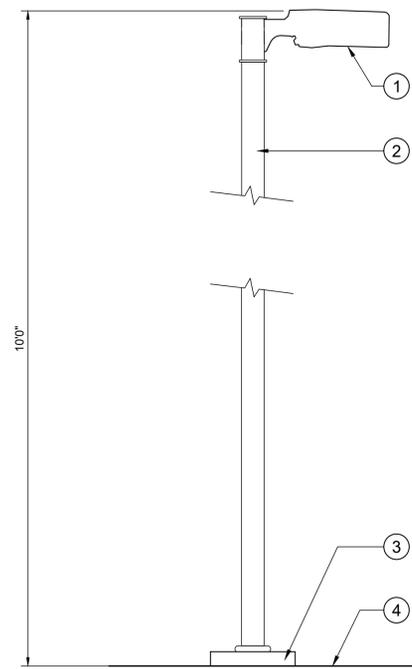


LEGEND:		
DESCRIPTION	QUANTITY	
FENCE MOUNT SECURITY CAMERA MOTION-ACTIVATED (UP TO 15 MIN WITH TRIGGERING)	3	
WALL MOUNT SECURITY LIGHT, WITH CAMERA MOTION-ACTIVATED (UP TO 15 MIN WITH TRIGGERING)	7	
PERIMETER SECURITY LIGHT, MOTION-ACTIVATED (UP TO 15 MIN WITH TRIGGERING)	4	
SITE AREA LIGHT	1	



ARCATA LAND COMPANY, LLC
3318 FOSTER AVENUE, ARCATA, CA
LIGHTING PLAN
SHEET C5.0



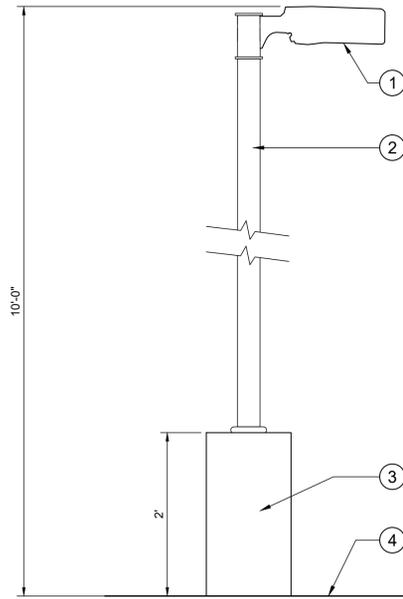


- ① LED AREA LIGHT (TWO FIXTURES PER POLE)
- ② LIGHT POLE
- ③ CONCRETE FOOTING
- ④ FINISH GRADE

NOTES

- A. STRUCTURAL ENGINEERING BY OTHERS
- B. ELECTRICAL ENGINEERING BY OTHERS
- C. ALL SECURITY LIGHTING TO BE MOTION ACTIVATED WITH LENGTH OF UP TO 15 MINUTES PER TRIGGERING

ELEVATION



- ① LED AREA LIGHT
- ② LIGHT POLE
- ③ CONCRETE FOOTING
- ④ FINISH GRADE

NOTES

- A. STRUCTURAL ENGINEERING BY OTHERS
- B. ELECTRICAL ENGINEERING BY OTHERS
- C. CONNECT TO DAWN TO DUSK TIMER

ELEVATION

1000LED®

FULL-CUTOFF WALL PACK LIGHT

45W



PRODUCT FEATURES:

- ❖ LUMILEDS LED, high luminous efficiency and long working life.
- ❖ High efficiency LED Driver, the wide range input voltage AC120-277V :
- ❖ Cast alloy design, better cooling, light quality, LED Tj < 85°C.
- ❖ Optical design, greatly improved the light utilization and evenness
- ❖ **PHOTOCELL CONTROL (OPTIONAL)**

Additional Information:

- o Power: 45W
- o Input: AC 120-277V
- o CCT : 5000K
- o Output: 4800 LM
- o Light Source: LUMILEDS
- o Driver: OVN

Structure Features:

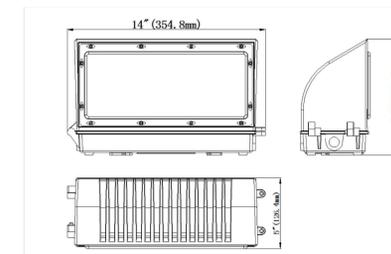
- o Shell Material: Alloy & PC
- o Color: Dark Bronze
- o Weight: 6.3 lbs.



MODEL #	
PROJECT	
NOTES	
DATE	
PREPARED BY	

PRODUCT APPLICATIONS:

The 1000LED LED WALL PACK Lighting Series can be widely used in Pedestrian Walkways, Parking Garages, Public Areas, Schools, Hospitals, Hotels and Outdoor Walkways



NOTE:

ALL WALL MOUNT SECURITY LIGHTS TO BE SET AT A HEIGHT OF 9' OR 10' ABOVE FINISHED GRADE.

3 WALL MOUNT SECURITY LIGHT CUT SHEET

SCALE: N/A

1 PERIMETER SECURITY LIGHTING

1" = 1'-0"

DETAIL-FILE

2 SITE AREA LIGHT

1" = 1'-0"

DETAIL-FILE

superbrihtleds.com

LED Parking Lot/Area Light
ALD Series Specifications

Project _____
Date _____ Type _____



ALD-50K30W-C-BRC3-FM

- Features**
- 100-277 VAC and 200-480 VAC models available
 - DLC Premium - >40 lm/W
 - 1-10 V dimmer compatible
 - >80 CRI
 - L70 rated 50,000 hour lifetime
 - Wide variety of mounting options available

Construction
Features a low-profile aluminum body and swappable polycarbonate lens design. Engineered for minimal wind resistance.

Application
Easily replaces traditional shoebox area/parking lot lights. Type III-M distribution and the these ideal for many applications including factories, warehouses, and other large, high ceiling spaces.

Output Equivalencies

ALD-xK10W-C-BRC3	250 W MH
ALD-xK15W-C-BRC3	400 W MH
ALD-xK19W-C-BRC3	750 W MH
ALD-xK30W-C-BRC3	1,000 W MH
ALD-xK40W-B-BRC3	1,500 W MH
ALD-xK50W-B-BRC3	2,000 W MH

Warranty

Five (5) Year Warranty

Certifications and Compliances

DesignLights Consortium listed as DLC Premium, UL Listed for damp or dry locations, and RoHS compliant.



T 314.743.3067
F 314.972.6202
email: commercial-sales@superbrihtleds.com
www.superbrihtleds.com/cat/industrial-led-lighting/

- Available Models***
- ALD-50K10W-C-BRC3
 - ALD-50K15W-C-BRC3
 - ALD-50K19W-C-BRC3
 - ALD-50K30W-C-BRC3
 - ALD-50K40W-B-BRC3*
 - ALD-50K50W-B-BRC3*
- Mounting Style**
- SF (Standard Knuckle Slipfitter)
 - SFS (PhotoCell Knuckle Slipfitter)
 - FM (Square/Round Pole Arm)
 - FB (U-Bracket/Flood)

Part Number Breakdown

Example: ALD-50K40W-B-BRC3-FM

Family	Color Temperature	Wattage	Voltage	Mount
ALD	50K [5000K]	10W [100 W]	C-BRC3 [120-277 VAC]	-SF
		15W [150 W]		-SFS
		19W [185 W]	-FM or	
		30W [300 W]	-FB*	
		40W [400 W]	B-BRC3 [200-480 VAC]	
		50W [500 W]		

Optional Accessories

- Mounting Options***
- Knuckle Slipfitter Mount (ALD-SF)
 - Knuckle Slipfitter PhotoCell Style Mount (ALD-SFS)
 - Square/Round Fixed Arm Pole Mount (ALD-FM)
 - U-Bracket/Flood Mount* (ALD-FB)

Alternate Lenses (required number varies by light)

- Type II-M (ALD-LENS-2M)
- Type III-S (ALD-LENS-3S)
- Type IV-M (ALD-LENS-4M)
- Type V-M (ALD-LENS-5M)
- Nema 6x5 (ALD-LENS-NEMA-6x5)

Notes

- * bundled with lights, but also available for purchase separately
- **Contact customer service if interested in options other than those listed.
- **100-300 W models only

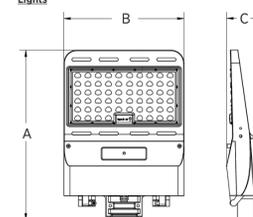
Rev V1 Date: 2/15/2019
Specifications are subject to change without notice.
Printed in the U.S.A.

superbrihtleds.com

LED Parking Lot/Area Light
ALD Series Specifications

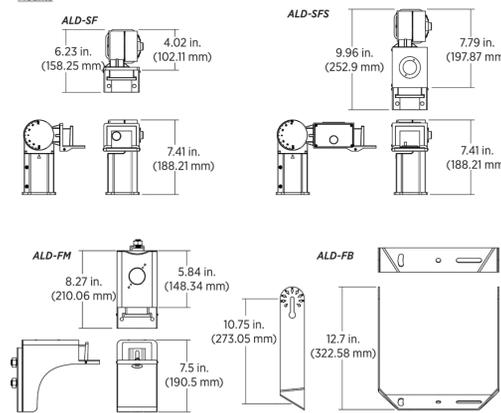
Dimensional Drawings

Lights



Model	Length (A)	Width (B)	Height (C)
ALD-50K10W-C-BRC3	16.88 in. (428.71 mm)	12 in. (304.8 mm)	3.46 in. (87.88 mm)
ALD-50K15W-C-BRC3			
ALD-50K19W-C-BRC3			
ALD-50K30W-C-BRC3	21.94 in. (557.34 mm)	12 in. (304.8 mm)	3.46 in. (87.88 mm)
ALD-50K40W-B-BRC3	30.54 in. (775.65 mm)	13.38 in. (339.85 mm)	4.16 in. (105.66 mm)
ALD-50K50W-B-BRC3			

Mounts



T 314.743.3067
F 314.972.6202
email: commercial-sales@superbrihtleds.com
www.superbrihtleds.com/cat/industrial-led-lighting/

Specifications are subject to change without notice.

T 314.743.3067
F 314.972.6202
email: commercial-sales@superbrihtleds.com
www.superbrihtleds.com/cat/industrial-led-lighting/

Specifications are subject to change without notice.

LIGHTING NOTES

1. ALL LIGHTS SHALL ADHERE TO THE INTERNATIONAL DARK SKY ASSOCIATION STANDARDS TO PREVENT LIGHT POLLUTION.
2. ALL SITE LIGHTING SHALL ADHERE TO THE HUMBOLDT COUNTY COMMERCIAL CANNABIS LAND USE ORDINANCE (ORDINANCE NO. 2559)
3. ALL SITE LIGHTING SHALL BE DOWN-SHIELDED TO PREVENT LIGHT FROM SPILLING OUTSIDE THE BOUNDARIES OF THE PARCEL AND OPERATED SUCH THAT FISH AND/OR WILDLIFE ARE NOT AFFECTED.

4 PERIMETER SECURITY / SITE AREA LIGHT

4

SCALE: N/A

ARCATA LAND COMPANY, LLC
3318 FOSTER AVENUE, ARCATA, CA
LIGHTING DETAILS
SHEET C5.1



CIVIL AND TRANSPORTATION ENGINEERING
CONSTRUCTION MANAGEMENT
LANDSCAPE ARCHITECTURE
MECHANICAL ENGINEERING
PLANNING
PUBLIC WORKS ADMINISTRATION
SURVEYING / GIS SOLUTIONS
WATER RESOURCES
612 CLARION COURT
SAN LUIS OBISPO, CA 93401
T 805 544-4011 F 805 544-4294
www.wallacegroup.us

BASIS OF BEARINGS: BOOK 64 OF SURVEYS, PAGES 111 & 112 AS SHOWN HEREON

COUNTY SURVEYOR'S STATEMENT

THIS MAP HAS BEEN EXAMINED IN ACCORDANCE WITH SECTION 8766 OF THE PROFESSIONAL LAND SURVEYORS' ACT THIS 14th DAY OF May, 2020.

R.C.G.

RONALD C. GARTON PLS 7717
HUMBOLDT COUNTY SURVEYOR



INSTRUMENT NO. 2000-12273-10 O.R.

SIMPSON MILL ROAD

COUNTY RECORDER'S STATEMENT

FILED THIS 18th DAY OF May, 2020, AT 11:23 A.M. IN BOOK 74 OF SURVEYS, AT PAGES 137-138, HUMBOLDT COUNTY RECORDS THE REQUEST OF KELLY-O'HERN ASSOCIATES.

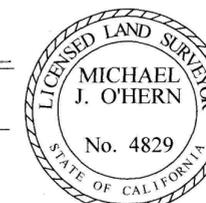
KELLY E. SANDERS
HUMBOLDT COUNTY RECORDER
BY *Kelly E. Sanders* DEPUTY
FEE \$ 91.00
INSTRUMENT NO. 2020-007981

SURVEYOR'S STATEMENT

THIS MAP CORRECTLY REPRESENTS A SURVEY MADE BY ME OR UNDER MY DIRECTION IN CONFORMANCE WITH THE REQUIREMENTS OF THE PROFESSIONAL LAND SURVEYORS' ACT AT THE REQUEST OF ARCATA LAND COMPANY LLC, IN JANUARY 2019.

Michael J. O'Hern

MICHAEL J. O'HERN L.S. 4829
DATED MAY 4, 2020



RECORD OF SURVEY

FOR
ARCATA LAND COMPANY LLC

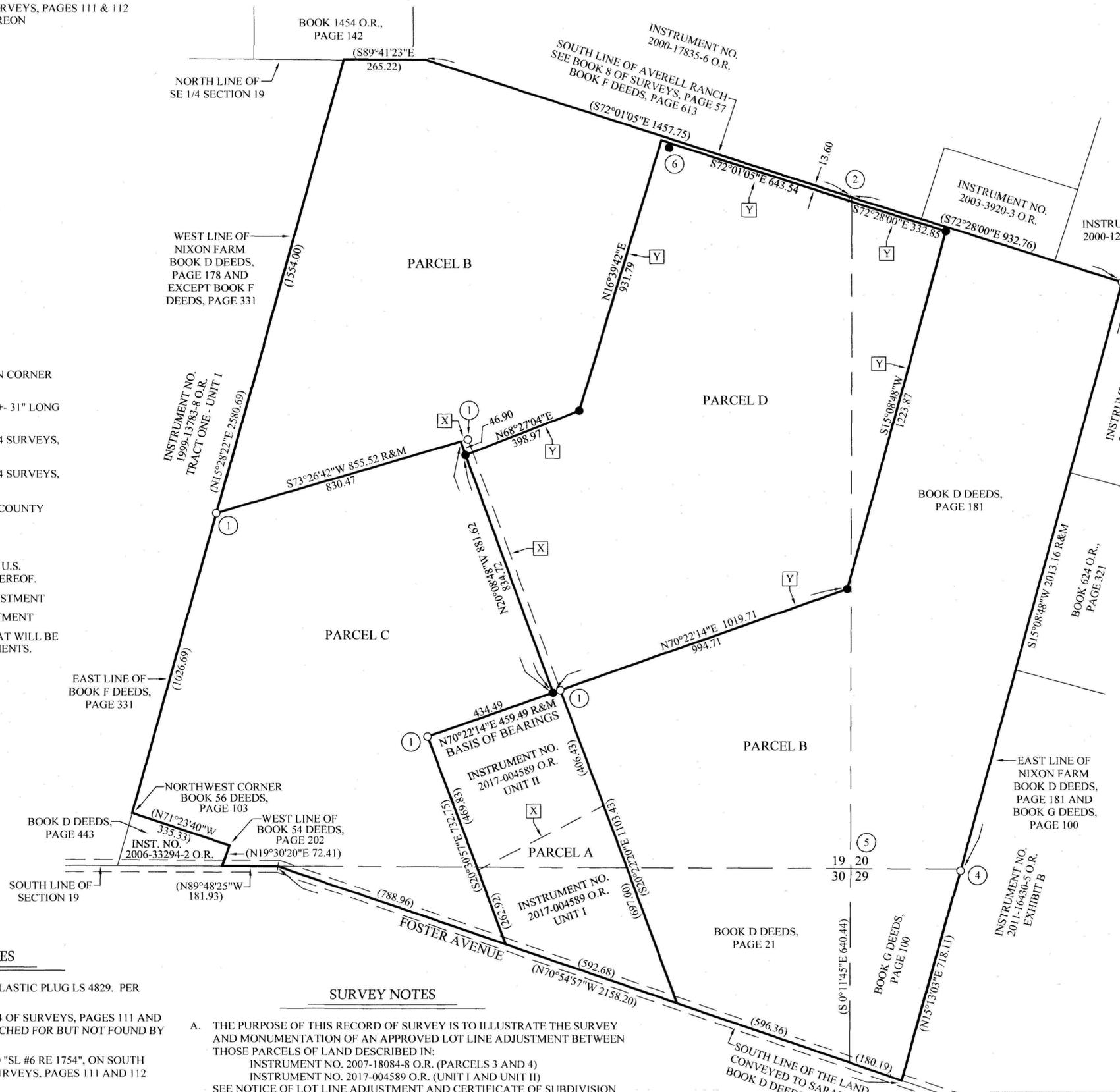
IN
SECTIONS 19, 20, 29 & 30 T6N, R1E, HUMBOLDT MERIDIAN
IN THE UNINCORPORATED AREA OF HUMBOLDT COUNTY
FEBRUARY 2019 SCALE 1" = 250'

HUMBOLDT COUNTY
STATE OF CALIFORNIA

KELLY-O'HERN ASSOCIATES
EUREKA, CALIFORNIA

SCALE 1" = 250'
0 125 250

SHEET 1 OF 2 SHEETS



LEGEND

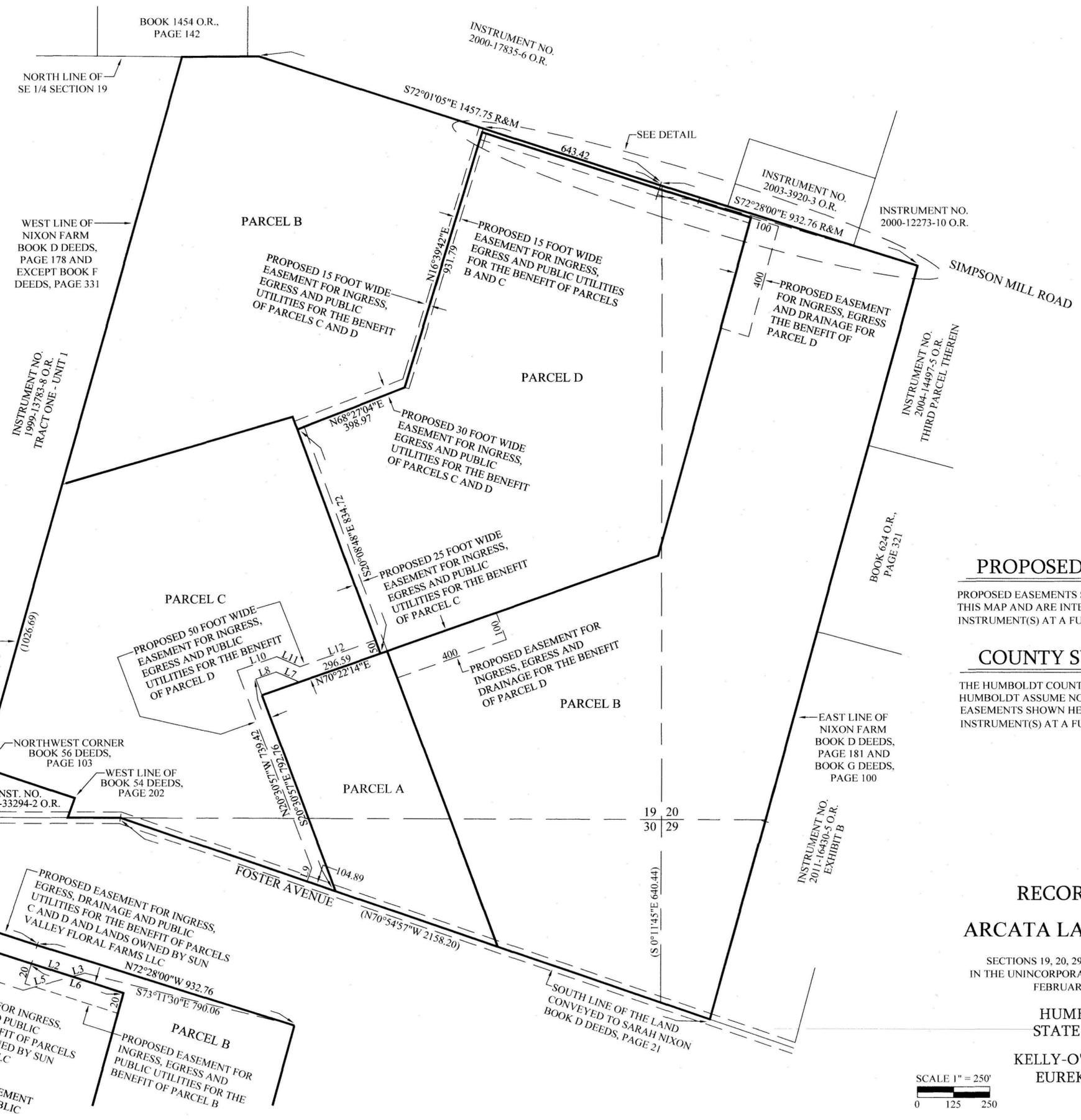
- FOUND MONUMENT, AS NOTED IN CORNER NOTES SHOWN HEREON
- SET 1/2" GALVANIZED IRON PIPE +/- 31" LONG WITH PLASTIC PLUG LS 4829
- () RECORD DIMENSION PER BOOK 64 SURVEYS, PAGES 111 & 112
- R&M RECORD DIMENSION PER BOOK 64 SURVEYS, PAGES 111 & 112 AND MEASURED
- O.R. OFFICIAL RECORDS, HUMBOLDT COUNTY
- BCIP BRASS CAP IRON PIPE
- CORNER NOTE NUMBER
- DISTANCES SHOWN HEREON ARE U.S. SURVEY FEET AND DECIMALS THEREOF.
- [X] LINE DELETED BY LOT LINE ADJUSTMENT
- [Y] LINE ADDED BY LOT LINE ADJUSTMENT
- SEE SHEET 2 FOR EASEMENTS THAT WILL BE CREATED BY SEPARATE INSTRUMENTS.

CORNER NOTES

- ① FOUND 1/2" GALVANIZED IRON PIPE WITH PLASTIC PLUG LS 4829. PER BOOK 64 OF SURVEYS, PAGES 111 AND 112.
- ② THE BCIP IN CONCRETE SHOWN ON BOOK 64 OF SURVEYS, PAGES 111 AND 112 (CORNER NOTE 17 THEREON) WAS SEARCHED FOR BUT NOT FOUND BY THIS SURVEY.
- ③ FOUND BRASS CAP IN CONCRETE, STAMPED "SL #6 RE 1754", ON SOUTH SIDE OF COUNTY ROAD. SEE BOOK 64 OF SURVEYS, PAGES 111 AND 112 (CORNER NOTE 16 THEREON).
- ④ FOUND 1" IRON PIPE WITH 2 1/2" BRASS CAP, STAMPED "SL #7 RE 1754". SEE BOOK 64 OF SURVEYS, PAGES 111 AND 112 (CORNER NOTE 15 THEREON).
- ⑤ SECTION CORNER - CALCULATED LOCATION FROM BOOK 64 OF SURVEYS, PAGES 111 & 112 SHOWN HEREON. NOT VISITED BY THIS SURVEY.
- ⑥ SET REFERENCE MONUMENT (ACTUAL CORNER FALLS IN A DITCH). ACTUAL CORNER BEARS N58°32'09"W 15.54 FEET FROM REFERENCE MONUMENT.

SURVEY NOTES

- A. THE PURPOSE OF THIS RECORD OF SURVEY IS TO ILLUSTRATE THE SURVEY AND MONUMENTATION OF AN APPROVED LOT LINE ADJUSTMENT BETWEEN THOSE PARCELS OF LAND DESCRIBED IN:
INSTRUMENT NO. 2007-18084-8 O.R. (PARCELS 3 AND 4)
INSTRUMENT NO. 2017-004589 O.R. (UNIT I AND UNIT II)
SEE NOTICE OF LOT LINE ADJUSTMENT AND CERTIFICATE OF SUBDIVISION COMPLIANCE RECORDED AS:
INSTRUMENT NO. 2020-006356 O.R.
INSTRUMENT NO. 2020-006357 O.R.
- B. THIS SURVEY IS BASED ON BOOK 64 OF SURVEYS, PAGES 111 AND 112.
- C. ONLY THE LINES CREATED BY LOT LINE ADJUSTMENT AND THE LINES BETWEEN FOUND CORNERS NOTED HEREON HAVE BEEN SURVEYED FOR THIS MAP. ALL OTHER DIMENSIONS ARE RECORD DIMENSIONS, AS NOTED.



LINE TABLE

LINE	BEARING	DISTANCE
L1	S16°39'42"W	13.60
L2	S72°28'00"E	125.27
L3	S84°18'30"E	17.54
L4	S16°39'42"W	26.40
L5	S84°18'30"E	128.64
L6	N72°28'00"W	332.85
L7	N66°23'45"W	87.59
L8	S70°22'14"W	75.00
L9	N19°05'03"E	48.35
L10	N70°22'14"E	145.60
L11	S66°23'45"E	87.59
L12	N70°22'14"E	276.33

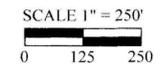
PROPOSED EASEMENT NOTE

PROPOSED EASEMENTS SHOWN HEREON ARE NOT CREATED BY THIS MAP AND ARE INTENDED TO BE CREATED BY SEPARATE INSTRUMENT(S) AT A FUTURE TIME.

COUNTY SURVEYOR'S NOTE

THE HUMBOLDT COUNTY SURVEYOR AND THE COUNTY OF HUMBOLDT ASSUME NO RESPONSIBILITY THAT THE PROPOSED EASEMENTS SHOWN HEREON WILL BE CREATED BY SEPARATE INSTRUMENT(S) AT A FUTURE TIME.

RECORD OF SURVEY
 FOR
ARCATA LAND COMPANY LLC
 IN
 SECTIONS 19, 20, 29 & 30 T6N, R1E, HUMBOLDT MERIDIAN
 IN THE UNINCORPORATED AREA OF HUMBOLDT COUNTY
 FEBRUARY 2019 SCALE 1" = 250'
 HUMBOLDT COUNTY
 STATE OF CALIFORNIA
 KELLY-O'HERN ASSOCIATES
 EUREKA, CALIFORNIA



Recording Requested By:
County of Humboldt
Planning and Building Department

Return To:
County of Humboldt
Planning and Building Department
3015 H Street
Eureka CA 95501-4484

2020-006356

Recorded - Official Records
Humboldt County, California
Kelly E. Sanders, Recorder
Recorded by: HUMBOLDT CNTY

Pages: 6

Recording Fee: \$ 41.00
Tax Fee: \$0.00
Clerk: kt Total: \$41.00
Apr 14, 2020 at 03:30:40



NOTICE OF LOT LINE ADJUSTMENT
AND CERTIFICATE OF SUBDIVISION COMPLIANCE

Property Owner(s) Of Record:
**ARCATA LAND COMPANY, LLC, a California Limited
Liability Company**

Assessor's Parcel Number(s):
505-151-003, et seq.

Number of Resulting Parcels Certified: 3
Identified herein as Parcel B, Parcel C, Parcel D

Application No.: **13484**

Case No.: **LLA-17-005**

NOTICE IS HEREBY GIVEN that the real properties described in the attached EXHIBIT "A" as Parcel B, Parcel C and Parcel D are the result of a lot line adjustment in accordance with Section 66412(d) of the Government Code of the State of California, and any portions of prior parcels contained within said resultant parcel descriptions have been merged into the single parcels described herein as Parcel B, Parcel C and Parcel D.

THIS NOTICE IS GIVEN by the person(s) whose name(s) is/are subscribed on page 3 of this instrument as the owner(s) of record of the real properties described in the attached EXHIBIT "A".

THIS CERTIFICATE relates only to issues of compliance or noncompliance with the Subdivision Map Act and local ordinances enacted pursuant thereto and no further compliance with the Subdivision Map Act is necessary. However, development of the parcel may require issuance of a permit or permits, or other grant or grants of approval.

THIS CERTIFICATE DOES NOT CERTIFY that the real property for which this notice has been given is suitable for development in accordance with existing or future regulations.

On this 18 day of MARCH, 2020, I HEREBY CERTIFY that the lot line adjustment for which this Notice is given has been executed with the approval of the County of Humboldt and that the parcel or unit of land resulting from the lot line adjustment complies with the provisions of the California Subdivision Map Act and County of Humboldt Ordinances enacted pursuant thereto.

BY

John H. Ford, Director
County of Humboldt Planning and Building Department

CERTIFICATE OF ACKNOWLEDGMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document, to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

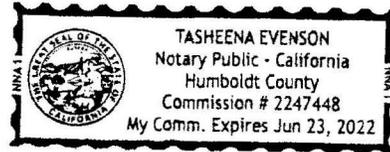
STATE OF CALIFORNIA }
COUNTY OF HUMBOLDT }

On this 18 day of March 20 20, before me, Tasheena Evenson
Notary Public, personally appeared **JOHN H. FORD** who proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his authorized capacity, and that by his signature on behalf of which the person acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing is true and correct.

Witness my hand and official seal.

Tasheena Evenson (seal)
Signature



Case No.: LLA-17-005
APN: 505-151-003 et seq.

OWNER'S REPRESENTATION

I hereby represent that I am the owner of record of the real properties described in the attached EXHIBIT "A" and that I have consented to and executed the lot line adjustment for which I have given the notice herein.

(for names and signatures)

ARCATA LAND COMPANY, LLC, a California limited liability company


By : Leendert DeVries, Manager

If additional notary acknowledgment required, please attach full page acknowledgment form.

CERTIFICATE OF ACKNOWLEDGMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document, to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

STATE OF CALIFORNIA }
COUNTY OF HUMBOLDT }

On this 19th day of February 2020, before me, Tina M. Uhl Notary Public, personally appeared Leendert DeVries who proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing is true and correct.

Witness my hand and official seal.

 (seal)
Signature

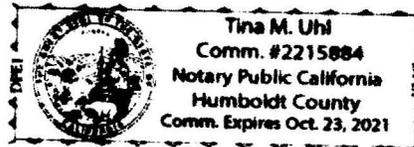


EXHIBIT A**PROPERTY DESCRIPTION**

All that real property situated in the County of Humboldt, State of California, described as follows:

PARCEL B

Those portions of Sections 19, 20, 29 and 30, Township 6 North, Range 1 East, Humboldt Meridian, described as follows:

COMMENCING at the Southeast corner of Section 19, Township 6 North, Range 1 East, Humboldt Meridian;

thence South 0 degrees 11 minutes 45 seconds East, 640.44 feet to the South line of that parcel of land conveyed to Sarah Nixon by deed recorded December 20, 1859, recorded in Book D of Deeds, Page 21, Humboldt County Records, said point being the TRUE POINT OF BEGINNING;

thence North 70 degrees 54 minutes 57 seconds West, along said South line, 596.36 feet;

thence North 20 degrees 22 minutes 20 seconds West, 1103.43 feet;

thence North 70 degrees 22 minutes 14 seconds East, 994.71 feet;

thence North 15 degrees 08 minutes 48 seconds East, 1223.87 feet;

thence North 72 degrees 28 minutes 00 seconds West, 332.85 feet;

thence North 72 degrees 01 minutes 05 seconds West, 643.54 feet;

thence South 16 degrees 39 minutes 42 seconds West, 931.79 feet;

thence South 68 degrees 27 minutes 04 seconds West, 398.97 feet;

thence North 20 degrees 08 minutes 48 seconds West, 46.90 feet;

thence South 73 degrees 26 minutes 42 seconds West, 830.47 feet, to the East line of that parcel of land conveyed to George Danskin by deed recorded June 3, 1867 in Book F of Deeds, Page 331;

thence North 15 degrees 28 minutes 22 seconds East, along said East line, 1554.00 feet, to the North line of the Southeast Quarter of said Section 19;

thence South 89 degrees 41 minutes 23 seconds East, along said North line, 265.22 feet to the most Westerly corner of that parcel of land conveyed to Dunbar D. Averell by deed recorded March 16, 1868 in Book F of Deeds, Page 613;

thence South 72 degrees 01 minutes 05 seconds East, along the South line of said parcel, 1457.75 feet;

thence continuing along the South line of said parcel, South 72 degrees 28 minutes East, 6.28 feet to the East line of said Section 19;

thence South 72 degrees 28 minutes East, along the North line of that parcel of land conveyed to Isaac Nixon by deed recorded February 13, 1861 in Book D of Deeds, Page 181, a distance of 926.48 feet to the most Easterly corner thereof;

thence South 15 degrees 08 minutes 48 seconds West, along the East line of said parcel, 2013.16 feet to the Southeast corner thereof;

thence South 15 degrees 13 minutes 03 seconds West, along the East line of that parcel of land conveyed to Sarah Nixon by Deed recorded October 17, 1868 in Book G of Deeds, Page 100, for a distance of 718.11 feet to the Southeast corner of said parcel;
thence North 70 degrees 54 minutes 57 seconds West, along the South line of said parcel, 180.19 feet to the TRUE POINT OF BEGINNING.

This description is based on a Record of Survey for Arcata Land Company LLC dated February 2019 to be filed with the Humboldt County Recorder subsequent to the recordation of this document.

PARCEL C

Those portions of Sections 19 and 30, Township 6 North, Range 1 East, Humboldt Meridian, described as follows:

COMMENCING at the Southeast corner of Section 19, Township 6 North, Range 1 East, Humboldt Meridian;

thence South 0 degrees 11 minutes 45 seconds East, 640.44 feet to the South line of that parcel of land conveyed to Sarah Nixon by deed recorded December 20, 1859, recorded in Book D of Deeds, Page 21, Humboldt County Records;

thence North 70 degrees 54 minutes 57 seconds West, along said South line, 596.36 feet;

thence North 20 degrees 22 minutes 20 seconds West, 1103.43 feet;

thence South 70 degrees 22 minutes 14 seconds West, 25.00 feet to the TRUE POINT OF BEGINNING;

thence North 20 degrees 08 minutes 48 seconds West, 881.62 feet;

thence South 73 degrees 26 minutes 42 seconds West, 830.47 feet, to the East line of that parcel of land conveyed to George Danskin by deed recorded June 3, 1867 in Book F of Deeds, Page 331;

thence South 15 degrees 28 minutes 22 seconds West, along said East line, 1026.69 feet, to the Northwest corner of that parcel of land conveyed to George S. Connick by deed recorded January 28, 1896 in Book 56 of Deeds, Page 103;

thence South 71 degrees 23 minutes 40 seconds East, along the North line of that parcel of land conveyed to John A. Kneeland by deed recorded November 4, 1862 in Book D of Deeds, Page 443, for a distance of 335.33 feet, to the West line of that parcel of land conveyed to William Nixon by deed recorded June 5, 1895 in Book 54 of Deeds, Page 202;

thence South 19 degrees 30 minutes 20 seconds West, along said West line, 72.41 feet, to the South line of said Section 19;

thence South 89 degrees 48 minutes 25 seconds East, along said South line of Section 19, for a distance of 181.93 feet, to said South line of that parcel of land conveyed to Sarah Nixon;

thence South 70 degrees 54 minutes 57 seconds East, along said South line, for a distance of 788.96 feet;

thence leaving said South line, North 20 degrees 30 minutes 57 seconds West, 732.75 feet, to a point that bears South 70 degrees 22 minutes 14 seconds West from the point of beginning;

thence North 70 degrees 22 minutes 14 seconds East, 434.49 feet, more or less, to the TRUE POINT OF BEGINNING.

This description is based on a Record of Survey for Arcata Land Company LLC dated February 2019 to be filed with the Humboldt County Recorder subsequent to the recordation of this document.

PARCEL D

Those portions of Sections 19 and 20, Township 6 North, Range 1 East, Humboldt Meridian, described as follows:

COMMENCING at the Southeast corner of Section 19, Township 6 North, Range 1 East, Humboldt Meridian;

thence South 0 degrees 11 minutes 45 seconds East, 640.44 feet to the South line of that parcel of land conveyed to Sarah Nixon by deed recorded December 20, 1859, recorded in Book D of Deeds, Page 21, Humboldt County Records;

thence North 70 degrees 54 minutes 57 seconds West, along said South line, 596.36 feet;

thence North 20 degrees 22 minutes 20 seconds West, 1103.43 feet, to the TRUE POINT OF BEGINNING;

thence North 70 degrees 22 minutes 14 seconds East, 994.71 feet;

thence North 15 degrees 08 minutes 48 seconds East, 1223.87 feet;

thence North 72 degrees 28 minutes 00 seconds West, 332.85 feet;

thence North 72 degrees 01 minutes 05 seconds West, 643.54 feet;

thence South 16 degrees 39 minutes 42 seconds West, 931.79 feet;

thence South 68 degrees 27 minutes 04 seconds West, 398.97 feet;

thence South 20 degrees 08 minutes 48 seconds East, 834.72 feet, to a point that bears South 70 degrees 22 minutes 14 seconds West from the point of beginning;

thence North 70 degrees 22 minutes 14 seconds East, 25.00 feet, more or less, to the TRUE POINT OF BEGINNING.

This description is based on a Record of Survey for Arcata Land Company LLC dated February 2019 to be filed with the Humboldt County Recorder subsequent to the recordation of this document.

Prepared by:

Michael J. O'Hern

Michael J. O'Hern

LS 4829

Dated: FEB. 24, 2020



Arcata Land Company LLC

APPS #12255 – 3318 Foster Avenue, Arcata, CA

Commercial Cannabis Outdoor & Mixed-Light Cultivation Facilities

Outdoor & Mixed-Light Cultivations Operations Plan & Manual

Revised 10/17/2020

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OPERATIONS PLAN & MANUAL

1) County's Access to the Facility:

- a) All facility personnel will cooperate fully with all conditions in the Permit and Permit Application requiring that the County, its agents, and employees, be granted access to the facility to seek verification of the information contained within the permit, permit applications, the Operations Manual, and the Operating Standards at any time before or after the permits are issued.
- b) The Humboldt County Sheriff's Department will be authorized to have access to the facility's security surveillance video.

2) Staffing & Staff Screening Processes

- a) The facilities will require up to 116 FTE employees at full buildout. The operation will be seasonal, with the majority of employees needed beginning in April (planting) and extending through the end of October (final harvest).
- b) All candidates for staff positions will undergo criminal background checks as part of the standard screening process. To the maximum effect allowed by California and federal employment law, candidates with a felony criminal history or a history of drug abuse will be screened from employment.

3) Vehicle Trips

- a) See Traffic Impact Study prepared for this project by W-Trans for Vehicle Trip estimates and other transportation methods; i.e. pedestrian, bicycle, transit.

4) Days and Hours of Operation

- a) The facility is not open to the public and will not accept visitors without a specific business purpose.
- b) Hours of operation will generally be 6:30 a.m. to 3:30 p.m., Monday through Saturday, although approximately 15 employees will work an extended evening shift to manage the propagation and cultivation process.

5) Location Map (See Site Plan)

6) Security Measures

- a) The security measures located on the premises will include the following:
 - i) Lighting -- outdoor lighting will be minimized and controlled by photocell switching, timers, infrared motion sensors and/or other state-of-the-art control systems to provide an appropriate light level at the exterior of the facilities to ensure that personnel and the video surveillance system can effectively monitor the space in and around the facility. Exterior lighting will be directed so as to not pose a nuisance to neighboring properties.
 - ii) Camera Systems -- All Project areas will be covered by camera systems for surveillance and worker safety purposes, and to prevent product loss or diversion.
 - iii) Alarm – a security/burglar alarm system will be installed and operated at all appropriate times within the facility. This system will be monitored by a security staff and a third-party remote central control station which will have the responsibility for automatically providing notification to law enforcement of any breach in the facility’s security system.
 - iv) Access Control -- all entrances to the facility will be restricted by an access control system. 24 hour access to the facility by emergency responders (Fire Dept.) will be provided via a Knox Box.
 - v) Fencing – the cultivation area will be fenced with chain-link fencing.
 - vi) The Safety of Staff -- working in concert together, the access control system, lighting, fencing, surveillance, and alarm systems, will provide a secure and protected facility for the staff to occupy.
 - vii) The security measures will secure the commercial cannabis against diversion for non-commercial purposes by protecting against theft not only from intruders, but also from staff members and visitors. This is done by limiting access into the facility as necessary and by surveillance monitoring of personnel and visitors at all times when in close proximity to the product. Strict inventory control measures will also be engaged to prevent and detect diversion.
 - viii) All commercial cannabis other than lab samples will be transported to State licensed and/or locally permitted licensed commercial cannabis, processing, wholesale, distribution, or manufacturing facilities by a state licensed and/or locally permitted licensed transport company.

7) Customer Screening, Registration, and Validation Process and Procedures.

- a) The facility is for the purpose of cultivation only, and all products will be sold to state licensed facilities on a wholesale basis. As this is the case, the facility will not be open to the public and will not accept visitors without a specific pre-authorized business purpose. Only authorized representatives of state licensed customer facilities and appropriately licensed vendors will be allowed to enter the facility and be in close proximity to commercial cannabis, but in all cases supervised at all times. Any other vendors or maintenance workers allowed in the facility will be at all times escorted and sequestered from the finished products and harvested materials.

8) Inventory control processes and procedures

- a) The facilities inventory control process includes tracking of all incoming seedlings, including the name and state license number of the licensee, the testing lab data (as applicable), the strain, the supplier’s product tracking identification data, and bill of lading from the transport company or nursery.

- b) All incoming plants will be assigned a unique number or identifier that can be cross-referenced to the above referenced data and stays with the product through the cultivation, harvesting, off-site processing, and to final sale to our authorized customers.
- c) All outgoing product will be tracked by SKU, batch number, invoice, and shipping documents; unless the product is not for sale and will be destroyed. The process for documenting product to be destroyed is described separately in this manual.
- d) The methodologies for tracking and inventory control of commercial cannabis may be modified subject to requirements imposed by the County, Department of Health, or Bureau of Cannabis Control, and will be adjusted accordingly as required under law.

9) Not Used:

10) Description of chemicals stored or discharged:

- a) The facility may handle routine agricultural products and support chemicals (e.g., fertilizers, pesticides, fuels, lubricants) in amounts requiring a Hazardous Material Business Plan (HMBP). If so, it will register its hazardous materials with the local agency using the Hazardous Materials/Waste Registration Form so that the local agency can evaluate the storage or use and give notice of any permits or storage/use fees that may apply.
- b) If the facility begins to handle any individual hazardous material or mixture containing a hazardous material which has a quantity at any time during the reporting year equal to or greater than those listed below, it will complete a Hazardous Material Business Plan (HMBP) and submit a copy to the local agency (Humboldt County DHHS Division of Environmental Health):
 - i) 500 pounds for solid hazardous materials. [H&SC §25503.5(a)]
 - ii) The following amounts for liquid hazardous materials:
 - (a) Lubricating oil as defined by H&SC §25503.5(b)(2)(B): 55 gallons of any type or 275 gallons aggregate quantity on site. H&SC §25503.5(b)(2)(A)
 - (b) All others, including waste oil: 55 gallons. [H&SC §25503.5(a)]
 - iii) The following amounts of hazardous material gases:
 - (a) Oxygen, Nitrogen, or Nitrous Oxide stored/handled at a physician, dentist, podiatrist, veterinarian, or pharmacist's place of business: 1,000 cubic feet of each material on site. [H&SC §25503.5(b)(1)]
 - (b) All others: 200 cubic feet. [H&SC §25503.5(a)]
 - iv) Amounts of radioactive materials requiring an emergency plan under Parts 30, 40, or 70 of Title 10 Code of Federal Regulations or equal to or greater than applicable amounts specified in items 1, 2, or 3, above, whichever amount is smaller. [H&SC §25503.5(a)]

v) Applicable federal threshold planning quantities for extremely hazardous substances listed in 40 CFR Part 355, Appendix A.

c) Disposal of any chemical, dangerous, or hazardous waste will be conducted in a manner consistent with federal, state and local laws, regulations, rules or other requirements. Any waste solvents or other chemicals will be handled and disposed of properly by *Safety-Kleen* or another highly qualified and properly licensed contractor.

11) Consumer safety control processes, procedures, and documentation.

a) Product Quality Control:

i) In addition to meeting all state and local requirements for product quality control, the standard procedures for operation will include the following:

(1) Samples from each batch of finished products will be screened and tested by a state licensed and/or locally permitted licensed independent laboratory for pesticides, mold, and other undesirable qualities prior to release for sale to wholesalers and retailers.

(2) Documentation of all lab test results will be kept on file.

b) Packaging:

i) All final packaging of processed goods will meet state requirements for packaging.

12) Health and Safety:

a) Training.

i) Prior to engaging in the harvesting of any product, the licensee will have an owner or employee who has successfully passed an approved and accredited food safety certification examination as specified in Sections 113947.2 and 113947.3 of the California Retail Food Code. Food safety certification will be achieved by successfully passing an examination from an accredited food protection manager certification organization. The certification organization will be accredited by the American National Standards Institute as meeting the requirements of the Conference for Food Protection's "Standards for Accreditation of Food Protection Manager Certification Programs."

b) Employee Knowledge:

i) All employees will have adequate knowledge of, and will be properly trained in, food safety as it relates to their assigned duties.

ii) There will be at least one food safety certified owner or employee at the facility responsible for setting policy and providing training to employees. The certified owner or employee need not be present at the facility during all hours of operation.

iii) The certified owner or employee will be responsible for ensuring that all employees who handle, or have responsibility for handling harvested commercial cannabis, have sufficient knowledge to ensure the safe handling of the product. The nature and extent of the knowledge that each employee is required to have may be tailored, as appropriate, to the employee's duties.

c) Facility Inspection:

- i) The facility will welcome inspection of the commercial cannabis cultivation area by the local fire department, building inspector, or code enforcement officer to confirm that no health or safety concerns are present. It is understood that the inspections may result in additional specific standards to meet local jurisdiction restrictions related to commercial cannabis. An annual fire safety inspection may result in the required installation of fire suppression devices, or other means necessary for adequate fire safety.

d) Sanitary Conditions:

The facility will take all reasonable measures and precautions to ensure the following:

- i) That any person who, by medical examination or supervisory observation, is shown to have, or appears to have, an illness, open lesion, including boils, sores, or infected wounds, or any other abnormal source of microbial contamination for whom there is a reasonable possibility of contact with commercial cannabis will be excluded from any operations which may be expected to result in contamination until the condition is corrected;
- i) Hand washing facilities will be clean, functional, and be furnished with running water. Hand washing facilities shall be located in close proximity to where good sanitary practices require employees to wash or sanitize their hands, and provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices;
- ii) That all persons working in direct contact with commercial cannabis will conform to hygienic practices while on duty, including but not limited to:
 - (1) Maintaining adequate personal cleanliness;
 - (2) Washing hands thoroughly in an adequate hand-washing area(s) before starting work and at any other time when the hands may have become soiled or contaminated; and
 - (1) Refraining from having direct contact with commercial cannabis if the person has or may have an illness, open lesion(s), including boils, sores, or infected wounds, or any other abnormal source of microbial contamination, until such condition is corrected.
- iv) That waste is properly removed and the operating systems for waste disposal are maintained in an adequate manner so that they do not constitute a source of contamination in areas where cannabis is exposed;
- iii) That there is appropriate lighting in all areas where commercial cannabis is stored, and where equipment or utensils are cleaned;
- v) That there is adequate screening or other protection against the entry of pests. Rubbish will be disposed of so as to minimize the development of odor and minimize the potential for the waste becoming an attractant, harborage, or breeding place for pests;
- iv) That fixtures and other facilities are maintained in a sanitary condition;

- v) That toxic cleaning compounds, sanitizing agents, and other chemicals will be identified, held, stored and disposed of in a manner that protects against contamination of cannabis in a manner that is in accordance with any applicable local, state or federal law, rule, regulation or ordinance;
- vi) That all operations will be conducted in accordance with adequate sanitation principles;
- vii) That employees are provided with adequate and readily accessible toilet facilities that are maintained in a sanitary condition and good repair; and
- viii) That any cannabis or cannabis waste that can support the rapid growth of undesirable microorganisms are held in a manner that prevents the growth of these microorganisms.

13) Solid Waste:

- a) Refuse will be sorted to divert recyclables such as paper, plastic, glass, and metals from the waste stream. Those recyclables will be taken to a recycling center for recycling.
- b) The remaining solid wastes will be collected and deposited into a solid waste receptacle for temporary storage, which will be kept covered. The solid waste will be removed from the site no less frequently than weekly and disposed of at an authorized waste transfer facility. The solid waste receptacle will be sized appropriately for the volume of waste generated and may be adjusted in size periodically as conditions warrant due to production cycles and seasonal factors.

14) Disposal of Product Waste and Destroyed Product:

- a) Methods to make waste unusable and unrecognizable.
 - i) Cannabis waste will be made unusable and unrecognizable prior to leaving the facility through one of the following methods unless another method is prescribed by the County of Humboldt or the State of California:
 - (1) Grinding and/or mixing with other plant materials for composting; or if required;
 - (2) Grinding and incorporating the cannabis waste with non-consumable, solid wastes listed below such that the resulting mixture is at least 50 percent non-cannabis waste:
 - (a) Non-recyclable solid waste;
 - (b) Green waste;
 - (c) Grease or other compostable oil waste;
 - (d) Bokashi, or other compost activators;
 - (e) Other wastes approved by the State Licensing Authority that will render the cannabis waste unusable and unrecognizable as cannabis; and
 - (f) Soil.
 - ii) The methodology for destroying and disposing of cannabis waste shall be in compliance with all state regulatory requirements.
- b) Records of destroyed product:
 - i) Records of destroyed raw materials and product will be kept and cross-referenced by batch number and SKU and/or another unique identifier. The weight or volume, as appropriate, will be recorded along with the method of disposal.

- ii) The methodology for recording destroyed cannabis waste shall be in compliance with all state regulatory requirements.

Cultivation Plan

15) Basic Requirements

a) Water Quality, Conservation, & Use

- i) Description of water source, storage, irrigation plan, and projected water usage.
 - (1) All water for cultivation will be supplied by existing wells. No diverted surface water is intended nor required to be stored for use during the standard surface water diversion forbearance period.
 - (2) Project Irrigation Water Usage (Cubic Feet per month):

The Project’s estimated irrigation water use, by month, is shown below.

PROJECTED IRRIGATION WATER USAGE

	Month ¹						
	April	May	June	July	August	September	October
Gallons (millions)	0.9	2.3	3.5	4.0	3.4	2.2	0.7
Acre-Feet	2.6	7.1	10.9	12.2	10.5	6.6	2.2

Notes:

1. No irrigation water expected during the months of November through March
- ii) Irrigation will be controlled by an automated irrigation system (e.g., Priva process control system) that will measure soil moisture and the surrounding environment to deliver precise water-nutrient needs. The automated irrigation system will provide an advanced fertilizer mixing system, and control desired electrical conductivity, pH and flow rate. At all times, water will be applied using no more than agronomic rates. A copy of the Notice of Intent and Monitoring Self-Certification and other documents filed with the North Coast Regional Water Quality Control Board demonstrating enrollment either has been or will be provided.
 - iii) In lieu of establishing on-site water storage for retention of wet season flows sufficient to provide adequate irrigation water for the size of the area to be cultivated, water from the on-site well(s) will be used to meet all water usage requirements.
 - iv) An approval from the RWQCB has been or will be sought through enrollment pursuant to State Water Resources Control Board (SWRCB) Order WQ 2017-0023-DWQ. The facility will comply will all applicable water quality control measures in the order.
 - ii) No permits, licenses or registrations with the State Water Resources Control Board, Division of Water Rights are required in connection with this Project.
 - v) The applicant/operator acknowledges that the County reserves the right to reduce the size of the area allowed for cultivation under any clearance or permit issued in accordance with this Section in

the event that environmental conditions, such as a sustained drought or low flows in the watershed will not support diversions for irrigation.

b) Drainage, Run-off, and Erosion Control:

- i) Drainage, Run-off, and Erosion Control will all be managed within the RWQCB's requirements for dischargers. The cultivation is to be located within a fully enclosed structure(s) during the wet seasons which prevents soil erosion, and any excess water used during cultivation will be recycled or evaporated instead of discharged. No cultivation water will be disposed of by discharge.
- ii) Site maintenance, erosion control and drainage features may include the following:
 - (1) Roads will be maintained as appropriate (with adequate surfacing and drainage features) to avoid developing surface ruts, gullies, or surface erosion that results in sediment delivery to surface waters.
 - (2) Roads, driveways, trails, and other defined corridors for foot or vehicle traffic of any kind will have adequate ditch relief drains or rolling dips and/or other measures to prevent or minimize erosion along the flow paths and at their respective outlets.
 - (3) Roads and other features will be maintained so that surface runoff drains away from potentially unstable slopes or earthen fills. Where road runoff cannot be drained away from an unstable feature, an engineered structure or system will be installed to ensure that surface flows will not cause slope failure.
 - (4) Roads, clearings and work areas (cleared/developed areas with the potential for sediment erosion and transport) will be maintained so that they are hydrologically disconnected, as feasible, from surface waters, including wetlands, ephemeral, intermittent and perennial streams.
 - (5) Ditch relief drains, rolling dip outlets, and road pad or terrace surfaces will be maintained to promote infiltration/dispersal of outflows and have no apparent erosion or evidence of soil transport to receiving waters.
 - (6) Stockpiled construction materials, if necessary, will be stored in a location and manner so as to prevent their transport to receiving waters.

c) Watershed and habitat protection:

- i) Watershed and habitat protection will be provided through compliance with the RWQCB's requirements associated with their respective permits and agreements.

d) Soils Management Plan:

- i) Soils used for cultivation will be steam-sterilized and re-fortified after harvest so that it may be used again for future cultivation, and the cycle repeated as many times as feasible to minimize the amount of imported soil necessary. In the event that soil cannot be reused, it will be disposed of appropriately as solid waste.

e) Storage of fertilizers, pesticides, and other regulated products:

- i) Storage and use of fertilizers and, pesticides will be conducted in accordance with the BPTC measures of SWRCB Order WQ 2017-0023-DWQ, which include requirements to apply fertilizers and soil amendments at only the proper agronomic rates, and to store materials in a manner that is protected from rainfall and erosion.
 - ii) Fertilizers, potting soils, compost, and other soils and soil amendments will be stored within fully enclosed spaces (building, greenhouses) to prevent surface water contamination.
 - (1) Pesticides/Herbicides:
 - (a) Under California law, the only pesticide products not illegal to use on cannabis are those that contain an active ingredient that is exempt from residue tolerance requirements and either registered and labeled for a broad enough use to include use on cannabis or exempt from registration requirements as a minimum risk pesticide under FIFRA section 25(b) and California Code of Regulations, title 3, section 6147. For the purpose of compliance with conditions of this Order, any uses of pesticide products will be consistent with product labelling and any products on the site will be placed, used, and stored in a manner that ensures that they will not enter or be released into surface or ground waters.
 - (2) Fertilizers and Soil Amendments:
 - (a) Fertilizers, potting soils, compost, and other soils and soil amendments will be stored in locations and in a manner in which they cannot enter or be transported into surface waters and such that nutrients or other pollutants cannot be leached into groundwater.
 - (b) Fertilizers and soil amendments will be applied and used per packaging instructions and/or at proper agronomic rates.
 - (c) Cultivation areas will be maintained so as to prevent nutrients from leaving the site during the growing season and post-harvest.
- f) Electrical Power:
 - i) The site is on the electrical grid. Generator power will not be used for cultivation.
- g) Cultivation Activities:
 - i) Cultivation activities are described as “Outdoor and Mixed-light” as defined in Humboldt County’s CMMLUO.
 - ii) Schedule of activities:
 - (1) Activities will generally include preparation for Propagation, planting, plant care, and harvesting.
 - (2) The cultivation schedule will be optimized to allow consistent production levels (weekly harvests) to minimize fluctuations in labor needs and deliver stable volumes of products to customers. A summary of anticipated seasonal cultivation activities is shown in Table 2, below:

TABLE 2
ANTICIPATED SCHEDULE OF SEASONAL CULTIVATION ACTIVITIES

Planting Details			Cultivation Activities			
Planting Cycle	Planting Date	Approx. No. of Hoop Structures	Plant Maintenance (Pruning)	Plant Maintenance (De-fanning)	Plant Maintenance (De-fanning)	Harvest
1	Mar 31	9	Apr 21	May 26	Jun 16	Jun 23
2	Apr 7	9	Apr 28	Jun 2	Jun 23	Jun 30
3	Apr 14	9	May 5	Jun 9	Jun 30	Jul 7
4	Apr 21	9	May 12	Jun 16	Jul 7	Jul 14
5	Apr 28	9	May 19	Jun 23	Jul 14	Jul 21
6	May 5	9	May 26	Jun 30	Jul 21	Jul 28
7	May 12	9	Jun 2	July 7	Jul 28	Aug 4
8	May 19	9	Jun 9	Jul 14	Aug 4	Aug 11
9	May 26	9	Jun 16	Jul 21	Aug 11	Aug 18
10	Jun 2	9	Jun 23	Jul 28	Aug 18	Aug 25
11	Jun 9	9	Jun 30	Aug 4	Aug 25	Sep 1
12	Jun 16	9	Jul 7	Aug 11	Sep 1	Sep 8
13	Jun 23	9	Jul 14	Aug 18	Sep 8	Sep 15
14	Jun 30	9	Jul 21	Aug 25	Sep 15	Sep 22
15	Jul 7	9	Jul 28	Sep 1	Sep 22	Sep 29
16	Jul 14	9	Aug 4	Sep 8	Sep 29	Oct 6
17	Jul 21	9	Aug 11	Sep 15	Oct 6	Oct 13
18	Jul 28	9	Aug 18	Sep 22	Oct 13	Oct 20
19	Aug 4	9	Aug 25	Sep 29	Oct 20	Oct 27

Notes: The anticipated schedule of seasonal activities is provided only as a guideline. Actual quantities and timing of activities will be dictated by weather, operational, and market conditions.

h) Cultivation-related wastes

i) Cultivation-related wastes including, but not limited to, empty soil bags, soil amendment bags, fertilizer bags and containers, empty plant pots or containers, dead or harvested plant waste, and spent growth medium will, for as long as they remain on the site, be stored at locations where they will not enter or be blown into surface waters, and in a manner that ensures that residues and pollutants within those materials do not migrate or leach into surface water or groundwaters.

i) Refuse and human waste

i) Refuse and garbage will be stored in a location and manner that prevents its discharge to receiving waters and prevents any leachate or contact water from entering or percolating to receiving waters.

- ii) Garbage and refuse will be disposed of at an appropriate waste disposal location (see “Solid Waste” Section above for more details).

16) General Performance Requirements:

- a) Water Quality – See “Water Quality, Conservation, & Use” above.
- b) Setbacks:
 - i) The area of cannabis cultivation is located as shown on the application site plan, appropriately set back at least 30 feet from any property line (unless adjoining parcel is of common ownership), and more than 600 feet from any School, School Bus Stop, Church or other Place of Religious Worship, Public Park, or Tribal Cultural Resource as requested by a tribal THPO.
 - ii) The property line of cultivation parcel is greater than 600’ from the property line of any school.
 - iii) Cultivation areas and associated facilities observe all required setbacks from watercourses, wetlands and Environmentally Sensitive Habitat Areas, as described within sections 313-33 and 313-38 of the code, as well as applicable resource protection policies. Where enhanced, reduced, or modified watercourse or wetland setbacks have been agreed to by the operator and RWQCB under enrollment pursuant to NCRWQB Order No. 2017-0023 and/or preparation of a Water Resources Protection Plan, these may control and supersede any setback applied pursuant to 314-61.1.
- c) Land Use:
 - i) The cultivation is located on land with a zoning classification of MH-Q.
- d) Odor Control:
 - i) All cannabis will be grown in enclosed greenhouse/hoop-house structures.
 - ii) Odor control measures will be deployed to reduce the odor of exhaust air from the enclosed greenhouses. Such measures may include carbon filtration, particle filtration, bio-filtration, sealed air-recirculation, and/or other feasible measures as advancements are made in odor control technology.
- e) Chemical, Hazardous, and Dangerous Materials –
 - i) Operator will refrain from the improper storage or use of any fuels, fertilizer, pesticide, fungicide, rodenticide, or herbicide. It is recognized that hazardous materials and wastes from agricultural businesses are regulated by the Humboldt County Environmental Health Division, that administers the Hazardous Materials program as one of the Certified Unified Program Agencies (CUPA).
- f) Electrical Generators:
 - i) Electrical Generators are not planned to be used at this facility.

17) Cultivation Operations Performance Standards:

- a) Labor:
 - i) Pursuant to the Medicinal and Adult Use Cannabis Regulation and Safety Act (“MAUCRSA”), Health and Safety Code section 19322(a)(9), the applicant hereby declares that it is a an ‘agricultural employer,’ as defined in the Alatorre-Zenovich-Dunlap-Berman Agricultural Labor Relations Act of 1975 (Part 3.5 commencing with Section 1140) of Division 2 of the Labor Code), to the extent not prohibited by law.”
 - ii) In addition to the above declaration of status as an “Agricultural Employer” per Labor Code Sections 1140-1166.3, the applicant/employer hereby agrees to comply with all applicable federal, state, and local laws and regulations governing California agricultural employers, which may include: federal and state wage and hour laws, CAL/OSHA, OSHA, California Agricultural Labor Relations Act, and the Humboldt County Code (including the Building Code).

- b) Processing Practices:
 - i) After being harvested, the cannabis is taken to an adjacent off-site CMMLUO permitted processing facility where it is trimmed, hung to dry, processed, cured and sorted.

- c) Employee/Worker Safety
 - i) Regarding employees engaging in commercial cannabis cultivation and processing, the licensee/employer will comply with the following Employee Safety Practices:
 - (1) Cultivation operations will implement safety protocols and provide all employees with adequate safety training relevant to their specific job functions, which may include:
 - (a) Emergency action response planning as necessary;
 - (b) Employee accident reporting and investigation policies;
 - (c) Fire prevention;
 - (d) Hazard communication policies, including maintenance of material safety data sheets (MSDS);
 - (e) Materials handling policies;
 - (f) Job hazard analyses; and
 - (g) Personal protective equipment policies, including respiratory protection.

- d) Emergency Contact List:
 - i) The licensee/employer will visibly post and maintain an emergency contact list which includes at a minimum:
 - (1) Operation manager contacts;
 - (2) Emergency responder contacts;
 - (3) Poison control contacts.

- e) Safe Drinking Water, Toilets, & Sanitary Facilities:
 - i) At all times, employees will have access to safe drinking water and toilets and hand washing facilities that comply with applicable federal, state, and local laws and regulations. The

licensee/employer will contract with a professional temporary sanitation facilities services provider to provide and maintain toilet and hand-washing facilities in accordance with the requirements of Cal-OSHA and ADA/California Accessibility regulations.

- f) On-Site Housing:
 - i) There is no intent to provide worker on-site housing at this time.

18) Performance Standards for Mixed-Light Cultivation:

- a) Shields:
 - i) When using artificial lighting for mixed-light cultivation, shields will be deployed to shield greenhouses so that little to no light escapes during nighttime hours. Light will be prevented from escape at a level that is visible from neighboring properties between sunset and sunrise. The shields will be constructed of Obscura fabric by Ludvig Svensson Company or equivalent.
- b) Design Standards:
 - i) The light source will comply with the International Dark Sky Association standards for Lighting Zone 0 and Lighting Zone 1, and be designed to regulate light spillage onto neighboring properties resulting from backlight, uplight, or glare (BUG).
- c) Compliance:
 - i) The applicant understands and agrees that should the Humboldt County Planning Division receive complaints that the lighting is out of alignment or not complying with these standards, within ten (10) working days of receiving written notification that a complaint has been filed, the applicant shall submit written verification that the lights' shielding and alignment has been repaired, inspected and corrected as necessary



18/19-0783

WATER WELL APPLICATION

CONSTRUCTION – REPAIR – DESTRUCTION

The Well Permit will be returned to the property owner when approved by Humboldt County Division of Environmental Health (DEH)

DISTRIBUTED
2-27-19

Instructions:

1. Complete both sides and submit the Water Well Application with required fee. Include Well Driller's signature and property owner's signature.
2. Work on a well shall not be started prior to approval of the Water Well Application by DEH.
3. Any changes made to the location of a new well shall be approved by DEH prior to commencement of drilling.
4. Well Driller shall notify DEH a minimum of 24 hours prior to sealing the annular space.

Site Address	<u>Simpson Mill Rd</u>	APN <u>506-231-011</u>
City/State/Zip	<u>Arcaata</u>	<u>CA</u>
Directions to Site	_____	
Applicant	<u>Rich Well Drilling</u>	Contact <u>STUART</u>
Mailing Address	<u>1251 Rail Road Dr</u>	Work Phone <u>839-1087</u>
City/State/Zip	<u>McKinleyville, Calif 95519</u>	Cell Phone _____
Property Owner	<u>Sun Valley Floral Farms</u>	Home Phone <u>926-8732</u>
Mailing Address	<u>3140 UPPER Bay Rd</u>	Work Phone <u>825-5883</u>
City/State/Zip	<u>Arcaata Calif 95521</u>	Cell Phone _____
I hereby grant 'right-of-entry' for inspection purposes		<u>Dan Rhyj CFO</u>
Drilling Contractor	<u>Rich Well Drilling</u>	C-57 License # <u>902702</u>
I hereby agree to comply with all laws and regulations of the County of Humboldt and the State of California Department of Water Resources Bulletin 74 pertaining to water well construction. I will contact Humboldt County Division of Environmental Health (DEH) when I commence work. Within 30 days after completion of work, I will furnish DEH a report of the work performed.		
Well Driller Signature:	<u>Stuart W. Dickey</u>	<div style="font-size: 2em; font-weight: bold;">RECEIVED</div> <div style="font-size: 1.2em;">FEB 27 2019</div> <div style="font-size: 0.8em;">HUMBOLDT CO. DIVISION OF ENVIRONMENTAL HEALTH</div>
Would driller like a copy of approved application?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<input type="checkbox"/> U.S. Mail address:	_____	
<input type="checkbox"/> Email address:	<u>swdickey@suddenlink.net</u>	
Type of Application:	Construction:	Intended Use:
<input checked="" type="checkbox"/> Construction	Estimated Depth (ft.) <u>150</u>	<input type="checkbox"/> Domestic - private
<input type="checkbox"/> Destruction	Diameter (in.) _____	<input type="checkbox"/> Community Supply
<input type="checkbox"/> Repair/Modification	Depth of Seal (ft.) _____	<input checked="" type="checkbox"/> Irrigation
	Sealing Material _____	<input type="checkbox"/> Other _____

Estimated Work Dates:

Casing:

Type of Sewage System:

Start _____

Diameter (in.) 8"

Community Sewer

Completion _____

Material steel

OWTS (Septic)

Distance from well site to OWTS 1000+

Special Requirements/Comments:

PLOT PLAN

Coastal Zone: Yes No

✓#6275 FOR OFFICE USE ONLY

Fee: \$746.00
Date: 2-27-19
Receipt: 910603
Project #: _____
Paid by: Rich Well Drilling

Site Approved by: am/lofby
Site Approved Date: 4/9/19
Sealed to Depth of: 20'
Seal observed: Yes No
Final Approved Date: am 4/9/19

State of California
Well Completion Report
 Form DWR 188 Submitted 4/6/2019
 WCR2019-004628

Owner's Well Number 1 Date Work Began 3/17/2019 Date Work Ended 3/27/2019
 Local Permit Agency Humboldt County Department of Health & Human Services - Land Use Program
 Secondary Permit Agency _____ Permit Number 18/19-0783 Permit Date 02/27/2019

Well Owner (must remain confidential pursuant to Water Code 13752)	Planned Use and Activity
Name _____	Activity <u>New Well</u>
Mailing Address _____	Planned Use <u>Water Supply Irrigation - Agriculture</u>
City _____ State _____ Zip _____	

Well Location	
Address _____	APN <u>506-231-011</u>
City <u>Arcata</u> Zip <u>95521</u> County <u>Humboldt</u>	Township <u>06 N</u>
Latitude <u>40 53 2.0399 N</u> Longitude <u>-124 6 3.9599 W</u>	Range <u>01 E</u>
Deg. Min. Sec. Deg. Min. Sec.	Section <u>19</u>
Dec. Lat. <u>40.8839</u> Dec. Long. <u>-124.1011</u>	Baseline Meridian <u>Humboldt</u>
Vertical Datum _____ Horizontal Datum <u>WGS84</u>	Ground Surface Elevation _____
Location Accuracy _____ Location Determination Method _____	Elevation Accuracy _____
	Elevation Determination Method _____

Borehole Information	Water Level and Yield of Completed Well
Orientation <u>Vertical</u> Specify _____	Depth to first water <u>21</u> (Feet below surface)
Drilling Method <u>Cable Tool</u> Drilling Fluid <u>Water</u>	Depth to Static _____
	Water Level _____ (Feet) Date Measured _____
Total Depth of Boring <u>130</u> Feet	Estimated Yield* <u>400</u> (GPM) Test Type <u>Bailing</u>
Total Depth of Completed Well <u>130</u> Feet	Test Length <u>6</u> (Hours) Total Drawdown <u>10</u> (feet)
	*May not be representative of a well's long term yield.

Geologic Log - Free Form		
Depth from Surface	Feet to Feet	Description
0	5	Brown Silty Top Soil
5	21	Brown Silty Clay
21	37	BROWN SandY Clay
37	85	Blue Sand And Gravel W/ Wood and Some Silty Clay
85	127	Yellow Sand And Gravel
127	130	Yellow Sand And Gravel W/ Hard yellow Clay

RECEIVED

APR - 8 2019

HUMBOLDT CO. DIVISION
 OF ENVIRONMENTAL HEALTH



1251 Railroad Drive. McKinleyville, CA 95519. State license#902702

August 19, 2020

Rudolf Visser
Arcata Land Company LLC
3318 Foster Avenue
Arcata, CA 95521

Subject: Agriculture Irrigation Well; APN 506-231-011

Dear Mr. Visser:

Rich Well Drilling completed pump testing and obtained a permit for an existing agriculture irrigation well on APN 506-231-011 in March 2019. The well is completed to a depth of approximately 150 feet and screened approximately 100' below surface in a state designated groundwater basin (Mad River Valley – Mad River Lowland; 1-008.01). There are no nearby streams or surface waters. Based on site-specific circumstances, I do not believe that the well has a hydraulic connection to any surface water or any larger shallow homogeneous aquifer.

Sincerely,

Stuart Dickey

Rich Well Drilling and Pump Service Company

MEMORANDUM

Arcata Land Company LLC Arcata Land Company LLC Site Improvements – 1595-0001



Date: September 23, 2020

To: Rudolf Visser
Arcata Land Company, LLC
3318 Foster Avenue
Arcata, CA 95521

From: Kyle Anderson, PE

Subject: Stormwater Management Strategy Revisions

CIVIL AND
TRANSPORTATION
ENGINEERING

CONSTRUCTION
MANAGEMENT

LANDSCAPE
ARCHITECTURE

MECHANICAL
ENGINEERING

PLANNING

PUBLIC WORKS
ADMINISTRATION

SURVEYING /
GIS SOLUTIONS

WATER RESOURCES

Introduction

This purpose of this memorandum is to present the stormwater management design strategy proposed for the commercial cannabis cultivation project being developed in an unincorporated area West of the City of Arcata. The project is located on the north side of Foster Ave. between Dolly Varden Road and Janes Road in Arcata, CA and is currently used for agriculture cultivation of both flowers and row crops.

Permitting

A previous preliminary stormwater management plan prepared by SHN Consulting applied the requirements of the Humboldt County Low Impact Development (LID) Manual and the Humboldt County MS4 Stormwater permit. Based on a review of the County's MS4 boundary, the proposed development lies outside the MS4 Phase II Permit Boundary Area (see **Appendix A**). Therefore, the proposed development is subject to the State Water Resource Control Board General Construction Permit post construction stormwater requirements.

As a result, a water balance must be performed according to the Construction General Permit post-construction requirements and the post-development runoff volume of the 85th percentile storm must be equal to or less than the pre-development runoff volume. See **Appendix B** for the preliminary water balance summary.

Site Hydrology

The existing parcel impacted by the proposed development is approximately 30 acres and drains to an existing ditch north of the site. Runoff from the site generally flows from south to north. The native soil is a silty clay loam with a stabilized infiltration rate of 2 inches per hour, as tested by SHN Consulting. The composite curve number of the pre-development area is 84 (see **Appendix C**).

The proposed development will add impervious area from the construction of hoop houses and concrete walkways. As a result, the proposed composite curve number is increased to 96.

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612 CLARION CT
SAN LUIS OBISPO
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T 805 544-4011
F 805 544-4294

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Due to the topography of the existing site, the post-development grading design splits runoff into two subcatchments, one collects the runoff from the northern portion of the parcel, and the other the southern portion (see **Appendix C** for subcatchment delineation). The proposed northern subcatchment is primarily hoop houses and open space and the proposed southern subcatchment is primarily hoop houses, open space, and an office building located in the southwest corner of the site.

Design

In order to separate applied irrigation water and stormwater runoff, the proposed development utilizes hoop houses to isolate the cannabis crops. Runoff from the hoop houses is conveyed to stormwater retention basins through a series of perforated pipes that run in between all of the hoop houses. (see **Appendix D**).

The perforated pipes are connected to a larger network of 12-inch storm drains which convey runoff to the retention basins. The site has two proposed retention basins, one for each subcatchment. The preliminary design for the northeast retention basin will provide 3.8 acre-feet of storage, and the southern retention basin will provide 2.5 acre-feet. To encourage infiltration into the native soil and satisfy the requirements of the stormwater balance calculator, the footprint of these basins will be a combined minimum of 1.75 acres and the bottom surface ripped to a depth of 6 inches to facilitate increased storage capacity.

Each basin will also be equipped with an outlet structure which will allow excess flow from larger storm events to be controlled and drained into the existing ditches adjacent to the property.