

**RESOLUTION OF THE PLANNING COMMISSION
OF THE COUNTY OF HUMBOLDT**

Resolution Number 25-004

Record Number: PLN-12856-CUP

Assessor Parcel Numbers: 217-051-001, 217-052-001, 217-053-002, 217-055-002, 217-056-001, 217-061-001, 217-062-003, 217-213-003, 217-214-001, and 217-253-001

Resolution by the Planning Commission of the County of Humboldt certifying compliance with the California Environmental Quality Act and conditionally approving the HumSun 3 LLC Conditional Use Permit and Special Permit.

WHEREAS, HumSun 3, LLC applied for a Conditional Use Permit for 3.1 acres of new mixed-light commercial cannabis cultivation and a Special Permit for project related wetland impacts, creation and enhancement, riparian area creation and enhancement, and the reconnection of a Class III ephemeral drainage; and

WHEREAS, a Mitigated Negative Declaration has been prepared for the proposed Conditional Use Permit and Special Permit and circulated for public review pursuant to Section 15074 of the CEQA Guidelines; and

WHEREAS, the Humboldt County Planning Commission held a duly-noticed public hearing on February 6, 2025, and reviewed, considered, and discussed the application for the requested Conditional Use Permit and Special Permit, and reviewed and considered all evidence and testimony presented at the hearing.

Now, THEREFORE BE IT RESOLVED, that the Planning Commission makes all the following findings:

1. FINDING:

Project Description: A Conditional Use Permit for 3.1 acres of new mixed-light commercial cannabis cultivation, and the development of ancillary structures for cultivation activities, including a 6,000 square-foot dry barn/nursery for drying, curing, and plant stock propagation, and a 1,280 square-foot commercial building for processing product grown on site. Water would be sourced from three wells on the parcel and will be stored in hard tanks totaling 250,000 gallons. A total of eight full-time employees are proposed, with an additional 10 employees needed for peak operations. Energy use would require a proposed electrical upgrade from PG&E and roof-mounted solar on the proposed buildings. While waiting for the PG&E upgrade and prior to build-out of the full mixed-light greenhouses, the Applicant proposes to cultivate the 3.1 acres using light-deprivation or full-sun outdoor cultivation techniques, which would not require artificial

lighting for cultivation. A Special Permit is required for project related wetland impacts, creation and enhancement, riparian area creation and enhancement, and the reconnection of a Class III ephemeral drainage.

EVIDENCE: a) Project File: PLN-12856-CUP

2. **FINDING:** **CEQA:** As required by the California Environmental Quality Act, the project was found subject to CEQA and a Mitigated Negative Declaration was prepared by the Planning and Building Department, Planning Division (Attachment 3), which evaluated the project for any adverse effects on the environment.

EVIDENCE: a) The CEQA document includes an analysis of the subject Conditional Use Permit and Special Permit. The Initial Study and Draft Mitigated Negative Declaration (IS/MND) was circulated from October 23, 2024 to November 21, 2024.

3. **FINDING:** **CEQA Public Comments:** The California Department of Cannabis Control (DCC) commented on the IS/MND stating that *"The IS/MND would be improved if it referenced DCC's requirements that all outdoor lighting for security purposes must be shielded and downward facing, and that lights used in mixed-light cultivation activities must be fully shielded from sunset to sunrise to avoid nighttime glare (Cal. Code Regs., tit. 4 §§ 16304 (6) and (7))."* The California Department of Fish and Wildlife (CDFW) contacted staff during the circulation period and requested that two additional conditions of approval be added to the project regarding wetland mitigation and fencing of mitigation areas.

EVIDENCE: a) The comment from DCC has been considered and does not change the conclusions of the IS/MND as this is a requirement of County Code.

b) The additional conditions requested by CDFW have been added as conditions of approval.

4. **FINDING:** **ENVIRONMENTAL IMPACTS FOUND NOT TO BE SIGNIFICANT - NO MITIGATION REQUIRED.** The following impacts have been found to be less than significant and mitigation is not required to reduce project related impacts: Aesthetics, Agriculture and Forestry Resources, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Land Use and Planning, Mineral Resources, Noise,

Population and Housing, Public Services, Recreation, Transportation, Utilities and Service Systems, and Wildfire.

- EVIDENCE:**
- a) There is no evidence of an impact to any of the above reference potential impact areas based on the project as proposed at this proposed location.
 - b) The IS/MND was circulated from October 23, 2024, to November 21, 2024.

5. FINDING: ENVIRONMENTAL IMPACTS MITIGATED TO LESS THAN SIGNIFICANT. The Initial Study identified potentially significant impacts to Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Hydrology and Water Quality, and Tribal Cultural Resources, which could result from the project as submitted.

- EVIDENCE:**
- a) Thirteen Mitigation Measures have been developed to ensure potential impacts are limited to a less than significant level and have been incorporated into a Mitigation Measures, Monitoring, and Reporting Program (Attachment 1B) which is being adopted as part of the project.

6. FINDING: The proposed development is in conformance with the County General Plan, Open Space Plan, and the Open Space Action Program.

- EVIDENCE:**
- a) General and intensive agriculture are use types allowed in the Residential Agriculture (RA) and Agricultural Grazing (AG) land use designations in which the site is located. The proposed cannabis cultivation and support facilities are within land planned and zoned for agricultural purposes, consistent with the use of Open Space land for managed production of resources. The use of an agricultural parcel for commercial agriculture activities is consistent with the Open Space Plan and Open Space Action Program. Therefore, the project is consistent with and complimentary to the Open Space Plan and its Open Space Action Program.
 - b) The parcel is bisected by a central roughly northwest-southeast trending ridge, with a series of small ravines and ephemeral streams flowing east and northeast into Larabee Creek or southwest into Coleman Creek. The property is split along this ridge into two (2) watersheds. The cultivation area and eastern portion of the ranch is located in the Upper Larabee Creek watershed, and the western portion of the ranch is located in the Basin Creek-Eel River watershed.

Larabee Creek, a perennial Class I watercourse and a tributary of the main stem of Eel River, flows through the eastern boundary of the parcel and crosses under Alderpoint Road twice within the parcel road frontage. Coleman Creek, a perennial watercourse and also a tributary of the main stem Eel River, originates in part within the western half of the parcel. Cooper Creek, a perennial Class I stream, flows from east of the parcel, south of the Project area, and continues west to a confluence with Larabee Creek. Additional intermittent and ephemeral watercourses, tributary to these perennial streams, are located across the property. All onsite watercourses are tributaries to the main stem of Eel River. An appropriate buffer from watercourses has been designated for the watercourses in accordance with County and State requirements.

The Proposed Project would create approximately 3.4 acres of new, impervious surface, including greenhouses, buildings, and water tanks, and would create approximately 6 acres of land disturbance in the Agriculture Exclusive zone on the 1,887-acre property, representing less than 1% of the Project Parcel.

The estimated 3.4 acres of impervious surface created by the Proposed Project represents 0.2% of the total parcel size (1,887 acres) and approximately 0.01% of the Upper Larabee Creek watershed (30,546 acres). The increase in runoff due to the new impermeable surfaces would be minimal. Stormwater would be collected from new impervious surfaces and treated through a proposed bio-filtration swale.

The Proposed Project would take place in the existing flats on slopes less than 10%. Stormwater would be collected from new impervious surfaces and conveyed to a designated stormwater treatment area located on the northwest area of the field. A Grading and Drainage Plan (Attachemt 3 - Appendix 1B) has been developed to address proposed onsite grading and stormwater runoff for the development of the site. Existing and proposed structures would be located outside of all appropriate watercourse setbacks, including the SWRCB General Order watercourse setbacks of 150 ft. from a Class I stream, 100 ft. from a Class II stream, and 50 ft. from a Class III stream, measured from the top of bank, in addition to the Streamside Management Areas and Wetlands Ordinance (SMAO) watercourse buffers of 100 ft. from a perennial stream and 50 ft. from an intermittent stream, measured by riparian drip line, not to exceed

200 ft. measured horizontally from the top of stream bank. The Site Grading and Drainage Plan includes erosion and sediment BPTCs designed to prevent, contain, and reduce sources of sediment.

HumSun 3, LLC would be required to enroll with the State Water Resources Control Board (SWRCB) for Tier 2, Low Risk under the Cannabis General Order prior to commencing cultivation operations. The Tier 2, Low Risk discharger status reflects the proposed operations of dischargers who disturb more than one (1) acre of land. The Applicant's proposal would be required to keep all cultivation activities out of riparian and wetland setbacks to obtain, and maintain, Low Risk status with SWRCB. Within 90 days of enrollment in the Cannabis General Order, a Site Management Plan (SMP) would be developed utilizing BPTC measures in accordance with the SWRCB's recommendations in the Cannabis General Order and Policy. The SMP would include erosion prevention and sediment control BPTC Measures designed to prevent, contain, and reduce sources of sediment. The SMP also includes corrective actions to reduce sediment delivery and prevent erosion. Additional filings, monitoring, and furnishing of supporting documents once the Proposed Project is fully approved and developed would be coordinated with the SWRCB.

A Lake and Streambed Alteration Agreement (LSAA) was issued for timber operations on the property under EPIMS-HUM-47015-R1 (Attachment 8). The LSAA was for the maintenance, replacement, or installation of stream-crossing culverts on the existing ranch road that leads to the ridgetop wells. The crossings included in the LSAA have since been addressed.

A new LSAA will be required for the realignment of the Class III ephemeral drainage or any other activities that divert or obstruct the natural flow or substantially change the bed, bank or channel of any stream onsite. This is included as a condition of approval.

- c) Numerous biological, botanical, and waters/wetland studies have been conducted for this site, most of which were conducted for the Original Project Scope (OPS). Authors included GHD, Natural Resources Management (NRM), ICF, NorthPoint Consulting Group, and J. Regan Consulting. Table 1 in the Staff Report displays a summary of these reports conducted for the Proposed Project Parcel, and further described in detail in the IS/MND. The table denotes whether the study was conducted across the entire parcel for the

previously proposed OPS or if the study was prepared for the currently Proposed Project Area. The purpose of these studies was to identify areas with potential environmental resource values that would require protection and to make recommendations for avoidance and protection measures.

The ISMND used this data and analysis to develop measures to protect sensitive habitat areas and threatened species. Mitigation Measures BIO-1 through BIO-8 focus on 1. protecting the locally rare Howell's yampah, 2. prohibition of the use of anticoagulant rodenticides, 3. protection of nesting birds, 4. noise monitoring associated with protection of nesting Northern Spotted Owl, 5. protection of amphibian and reptile species, 6. protection of bats, Sonoma Tree Vole, and West Coast DPS Fisher, 7. wetland and riparian mitigation, and 8. California oat grass mitigation. All mitigation measures have been specifically developed based on site-specific surveys to avoid impacts to threatened and endangered species and prevent impacts to sensitive and critical habitat and are included in the Mitigation Measures, Monitoring, and Reporting Program (Attachment 1B), which implementation and adherence to is a condition of project approval.

Between the various botanical surveys described above, a total of four (4) Sensitive Natural Communities were identified within or near the Proposed Project Area. Of those, two (2) impacted Sensitive Natural Communities, Dense sedge marshes (*Carex densa*) Provisional Herbaceous Alliance and *Festuca idahoensis* – *Danthonia californica* Herbaceous Alliance, would be impacted by the Proposed Project. Mitigation Strategies for these two (2) communities are discussed further, below.

The dense sedge marsh provisional alliance has a state rarity rank of S2?. A community ranked as a S2 is "at high risk of extirpation in the jurisdiction due to restricted range, few populations or occurrences, steep declines, severe threats, or other factors". The question mark after the S2 rank denotes an inexact numeric rank because there are insufficient samples over the full expected range of this community type, but existing information points to this rank. GHD categorized this alliance as a "Provisional Sensitive Natural Community." Dense sedge marshes are present within the field proposed for cultivation development and would be impacted by the Proposed Project. Impacts would be reduced to less than significant through wetland

mitigation (creation and enhancement), incorporated as Mitigation Measure BIO-7.

The California oat grass prairie alliance is designated as a S3 (vulnerable) community. The alliance is characterized by California oat grass being dominant or codominant in the herbaceous layer. California oat grass prairies are threatened by intensive livestock grazing, non-native grass invasions, and fire suppression. However, California oat grass is known to respond favorably to moderate grazing and dry season burning under the right conditions. As further mapped by NRM in 2021 and 2022, approximately 0.53 acres of California oat grass is present in the southeastern/eastern areas of the Proposed Project Area. Due to development of cultivation activities in the field, the Proposed Project would impact this species.

The OPS of 12-acres would have impacted 8.05 acres of the *Festuca idahoensis* – *Danthonia californica* Herbaceous Alliance across the 1,887-acre ranch. In reducing the Proposed Project by condensing all impacts to the Lower Field site, impacts to this Sensitive Natural Community have been greatly reduced, and a total of 0.21 acres are now proposed to be impacted, leaving 0.32 acres intact on the Lower Field site (Figure 1 in the Staff Report).

To address the potential impact to 0.21 acres of *Festuca idahoensis*-*Danthonia californica* herbaceous alliance, a minimum 2:1 ratio of compensatory mitigation is proposed to enhance at least 0.42 acres of *Festuca idahoensis*-*Danthonia californica* that are currently designated as moderately invaded (~31-60% non-native) and/or heavily invaded (~61-90% non-native) (Mitigation Measure BIO-8). The recommended mitigation area is the Mid-Ridge Site with 7.76 acres of mapped *Festuca-idahoensis* - *Danthonia californica* stands. This area was identified as a low to moderate quality stand due to presence of invasive species and cattle/pig impacts.

Due to the difficulty of planting *Festuca idahoensis* – *Danthonia californica* and considering the compensatory mitigation at least 0.42 acres, mitigation for the Proposed Project will focus on a combination of invasive species management and cattle and feral pig exclusion. If, given unforeseen circumstances, greater than 0.42 acres of the Sensitive Natural Community were impacted, the success criteria would adjust accordingly at a 2:1 mitigation ratio. Invasive species management emphasis will be placed on any invasive species with a California Invasive Plant Council (Cal-IPC) rank of High or Moderate,

and any weedy species of non-native plants threatening the successful establishment of any natural recruits. Target invasive species will include yellow star thistle and weedy perennial grasses. Excluding cattle and pigs from mitigation areas will be accomplished with fencing installed around the protected stand to prevent cattle and pigs from accessing the area. Additional management of feral pigs would be through hazing, licensed sport hunting, depredation permits, or a combination thereof.

Enhancement would occur until the success criteria of establishment of a minimum 0.42-acre "high quality" *Festuca idahoensis*-*Danthonia californica* stand with a minimum of 30% *Danthonia californica* cover and no greater than 10% invasive species cover. A Monitoring Report would be conducted each year by a qualified botanist, documenting the progress toward the success criteria, and the results would be furnished to the Humboldt County Planning and Building Department annually by December 31st. Monitoring would occur until the success criteria was met, with a minimum of three (3) years. This has been incorporated as Mitigation Measure BIO-8.

As described above, numerous wetland delineations have occurred across the Project Parcel for development of the OPS. Over 2.8 acres of wetlands have been delineated across the Parcel, per NRM and GHD delineations. Since these reports, the entire scope of the project has been significantly reduced in size and intensity. The OPS has been reduced from 12 acres of cannabis cultivation and numerous proposed rainwater catchment ponds with property-wide impacts, to 3.1 acres of cannabis cultivation in a centralized location on the existing agricultural field used for grazing.

Approximately 1.59 acres of seasonal wetlands have been delineated on or near the Proposed Project Area on the agricultural field. Of those, the Proposed Project would directly impact approximately 0.87 acres of seasonal wetlands (Figure 2 in the Staff Report). According to the Wetland Mitigation Summary (Attachment 3 - Appendix 2S), the impacted wetlands are "low-quality".

The Wetland Mitigation Summary proposes an overall mitigation ratio of 3:1 resulting in 2.63 acres (114,563 sq. ft.) of wetland mitigation for the 0.87 acres of impacted seasonal wetlands. The Wetland Summary proposes 0.88 acres (38,753 sq. ft.) of new, wetland creation (greater than a 1:1 ratio of wetland creation, with no net loss), 0.20 acres (8,778 sq. ft.) of wetland enhancement and

approximately 0.45 acres (19,602 sq. ft.) of enhancing existing riparian area, and 1.1 acres (46,354 sq. ft.) of new riparian area (Figure 2 in the Staff Report).

Per the Wetland Mitigation Summary, wetland creation areas (38,753 sq. ft., or 0.88 acres) are proposed adjacent to existing wetlands, at the northwestern end of the Proposed Project Area (WC-1), and southwest of the existing residence (WC-2, WC-3). In these areas, new wetlands would be created by shaping the ground to capture runoff from the upslope areas and stormwater treatment areas. Plantings in these zones would include the following species: slough sedge (*Carex obnupta*), small flowered bullrush (*Scirpus microcarpus*), and lamp rush (*Juncus effusus*) which may be installed in the bottom and lower side slopes of the wetlands. In addition, Arroyo willow (*Salix lasiolepis*), Oregon ash (*Fraxinus latifolia*), and California bay (*Umbellularia californica*) would be planted on wetland edges and in the transition to riparian forest areas.

Wetland enhancement areas are areas of existing onsite wetlands that could be enhanced through management of invasive species. These areas include existing wetlands on the northwestern end of the Proposed Project Area (WE-1, WE-2, WE-3), and southwest of the existing residence (WE-4, WE-5). Invasive Species, particularly the Himalaya berry (*Rubus armeniacus*) would be removed using hand-tools. Native species plantings (same species to wetland creation areas) would be planted to bolster the vegetation community and assist with slope stability.

With regard to riparian habitat, the Proposed Project includes reconnection of an existing Class III ephemeral drainage and creation of additional riparian habitat. The Class III ephemeral drainage currently runs through a county-maintained culvert under Alderpoint Road and discharges into the agricultural field, currently flowing westerly across the northeast edge of the agricultural field proposed for development. No existing defined channel connects this water to Larabee Creek or Cooper Creek. The Proposed Project would re-route this channel to the east, allowing the water to re-connect and flow to Cooper Creek. As part of this riparian enhancement, riparian species would be planted along the re-routed channel, creating new riparian habitat that currently does not exist onsite. Riparian enhancement of this stream would occur in accordance with the Wetland Mitigation Summary and has been incorporated as part of Mitigation Measure

BIO-7. Restoration and enhancement of this Class III drainage would provide an additional 1.1 acres of riparian habitat.

Riparian enhancement areas are located at the northwestern end of the Proposed Project Area, adjacent to Larabee Creek (RE-1), and along the newly created proposed Class III watercourse reconnection (RE-2). Within RE-1, enhancement activities would include removal of invasive species, including the Himalaya berry and sapling Douglas fir (*Pseudotsuga menziesii*) trees, which can negatively impact oak woodland and hardwood trees. No trees over 8 inches in diameter would be removed; implementation of this mitigation measure would not constitute mature tree removal. Erosion control and soil stabilization measures would be implemented in Area RE-1, as needed. In RE-2, a new area of riparian habitat would be created as a part of reconnection of a currently disconnected Class III watercourse. The area would be graded and lowered to provide a defined stream channel for water to be conveyed to Cooper Creek. Herbaceous wetland species (listed above) would be planted, in addition to coyote brush (*Baccharis pilularis*), Oregon white oak (*Quercus garryana* var. *garryana*) or black oak (*Quercus kelloggii*), and along with the Oregon ash and California bay. This mitigation has been included as Mitigation Measure BIO-7.

The original project was referred to CDFW in 2016 and no response was received. In May of 2024 CDFW conducted a site visit with the project agent. On May 29, 2024 CDFW provided a letter to the project agent identifying recommendations to be considered in the preparation of the IS/MND (Attachment 3 - Appendix 2R). Included were wetland mitigation recommendations, cattle exclusion recommendations, recommendations regarding the stream reconnection, sensitive natural community mitigation recommendations, Northern Spotted Owl (NSO) mitigation recommendations, and stormwater management mitigation recommendations. All CDFW's recommendations have been incorporated into the analysis in the IS/MND except for two (2) recommended NSO conditions regarding limitations on the use of emergency backup generators and construction activities. CDFW has since withdrawn their request for these conditions to be required as Mitigation Measure BIO-4 addresses the potential for noise associated with long-term operation by requiring noise monitoring at the edge of forested habitat (Attachment 6).

During the CEQA circulation period, CDFW contacted staff and

requested that two additional conditions of approval be added to the project regarding wetland mitigation and fencing of mitigation areas. (Attachment 5). They are as follows: 1) Implementation of Mitigation BIO-7 shall follow the guidelines and recommendations in the Wetland Mitigation Summary (J. Regan, 2024) and shall follow the monitoring and success criteria outlined in the Wetland Impacts Resulting from Proposed Development Project (NRM, 2022). By Monitoring Year 5, the wetland mitigation will be considered successful if it includes the following: (1) of 85% survival of native plantings, (2) less than 10% total absolute cover of invasive species, (3) favorable site hydrology for development of wetland soils, and (4) at least 0.09 acres of dense sedge marsh.”, and 2) Fencing shall be installed around all botanical, wetland, and riparian mitigation/enhancement areas to prevent cattle and pigs from accessing these areas and shall remain installed for the duration of any associated monitoring period. These have been added as conditions of approval.

- d) The project was referred to the Northwest Information Center (NWIC) and the Bear River Band of the Rohnerville Rancheria. NWIC recommended further study and consultation with local Tribes. A Phase 1 Cultural Resource Inventory Report was prepared for the Original Project Scope by Archaeological Research and Supply Company in March Of 2020. The investigation included a records search through the California Historical Resources Information System's regional NWIC, Native American Heritage Commission inquiry, coordination with local tribes, and pedestrian survey of the site.

The survey resulted in the recordation of two new precontact sites (HS-S1; HS-S2) and thirty-three isolated artifacts. A field assessment indicates that both HS-S1 and HS-S2 are likely eligible for the California Register of Historic Resources. Extended Phase 1 sub-surface testing at HS-S1 indicates it is likely eligible for the National Register of Historic Places. Coordination with the Bear River Band of the Rohnerville Rancheria determined that site protective mitigation measures -(CUL-1 and CUL-2) within the Mitigation Measures, Monitoring, and Reporting Program are appropriate and necessary for site protection and as a condition for the issuance of a cannabis cultivation permit within the Area of Potential Effect.

7. FINDING: The proposed development is consistent with the purposes of the Agriculture Exclusive (AE) with Special Combining Zone (B) and Timberland Production Zone (TPZ) zoning designations in which the site is located.

- EVIDENCE:**
- a) The AE zone is intended to be applied in fertile areas in which agriculture is and should be the desirable predominant use and in which the protection of this use from encroachment from incompatible uses is essential to the general welfare. General agriculture is a principally permitted use in this zoning district. The B zone is intended to be combined with any principal zone in which sound and orderly planning indicate that lot area and yard requirements should be modified. In this case, the B Zone requires a 160-acre minimum parcel size. The subject parcel is approximately 1,887 acres. The TPZ zone is intended to provide standards and restrictions for the preservation of timberlands for growing and harvesting timber. Other agricultural uses and the erection, construction, alteration, or maintenance of water transmission facilities are principally permitted in this zoning district. There is one existing well and there is 180,000 gallons of water storage and associated infrastructure proposed within the TPZ portion of the subject parcel.
 - b) Section 314-55.4.8.2.1.1 of Humboldt County Code (HCC) allows on parcels 320 acres or larger in size, up to one acre of cultivation area per 100-acre increment subject to approval of a Conditional Use Permit on parcels zoned AE provided that no more than 20% of the area of prime soils on the parcel is utilized for cannabis cultivation. The subject parcel is approximately 1,887 acres in size and the cultivation area will account for approximately 5% of the prime soils on the parcel.
 - c) All proposed development meets the minimum yard setback requirements for the AE and TPZ zones, as well as minimum Fire Safe setbacks.

8. FINDING: The proposed development is consistent with the requirements of the CMMLUO Provisions of the Zoning Ordinance.

- EVIDENCE:**
- a) The CMMLUO allows cannabis cultivation to be permitted in areas zoned AE as described in Section 5 above.
 - b) A portion of 217-051-001, portion of 217-052-001, portion of 217-

053-002, portion of 217-055-002, portion of 217-056-001, 217-061-001, 217-062-003, 217-213-003, 217-214-001, and 217-253-001 combined are one separate legal parcel per Notice of Merger and Certificate of Subdivision Compliance, Recorded June 6, 2018, Doc. #2018-010363.

- c) As shown on the Site Plans, all the project elements other than one existing well and 180,000 gallons of proposed water storage and associated infrastructure are within the AE zoned area.
- d) Irrigation water is sourced from non-diversionary wells on site.
- e) Cultivation will occur on slopes of 15% or less.
- f) The location of the cultivation complies with all setbacks and performance standards of the CMMLUO.
- g) All the applicable performance standards are included as conditions of project approval. They are required to be met throughout the timeframe of the permit.

9. FINDING:

The project and the conditions under which it may be operated or maintained will not be detrimental to the public health, safety, or welfare or materially injurious to properties or improvements in the vicinity.

EVIDENCE:

- a) The project site is accessed off a County-maintained Category 4 Road that can safely accommodate the proposed amount of traffic.
- b) The site is in a rural part of the County where the typical parcel size is over 40 acres, and many of the land holdings are very large. The proposed cannabis activities will not be in a location where there is an established neighborhood or other sensitive receptor such as a school, church, park or other use which may be sensitive to cannabis cultivation. Approving the Project on this site will not change the character of the area due to the large parcel sizes in the area.
- c) Irrigation water is sourced from non-diversionary wells on site.
- d) Provisions have been made in the Applicant's proposal to protect water quality through development of a bio-filtration swale and yearly site inspection, monitoring, and reporting to the NCRWQCB.

Annual reporting shall be submitted to the NCRWQCB. Therefore, runoff to adjacent property and infiltration of water to groundwater resources will not be adversely affected.

10. FINDING: All development as defined in the General Plan within or affecting Streamside Management Areas, wetlands or other wet areas not exempted under Section 314-61.1.4 shall require a permit pursuant to an application for development within SMAs, wetlands or other wet areas and processed as a Special Permit pursuant to the Humboldt County Zoning Regulations

EVIDENCE: a) As mitigated and conditioned in Section 6(c) above, the project complies with the requirements of the Streamside Areas and Other Wetlands Ordinance. Staff is in support of approving the Special Permit.

11. FINDING: The proposed development does not reduce the residential density for any parcel below that utilized by the Department of Housing and Community Development in determining compliance with housing element law.

EVIDENCE: a) The parcel was not included in the 2019 County Housing Inventory and is currently developed with a single-family residence. The proposed Project will not preclude development of an additional residence in the future.

12. FINDING: Approval of this project is consistent with Humboldt County Board of Supervisors Resolution No. 18-43 which established a limit on the number of permits and acres which may be approved in each of the County's Planning Watersheds.

EVIDENCE: a) The project site is in the Lower Eel Planning Watershed, which under Resolution 18-43 is limited to 336 permits and 116 acres of cultivation. With the approval of this project the total approved permits for cultivation in this Planning Watershed would be 80 and the total approved acres of cultivation would be 38.97.

13. FINDING: The common law Public Trust Doctrine protects sovereign lands, such as tide and submerged lands and the beds of navigable waterways, for the benefit, use and enjoyment of the public. These lands are held in trust by the State of California for the statewide public and for uses that further the purposes of the trust. The hallmark of the Public Trust Doctrine is that trust lands belong to the public and are to be used to

promote publicly beneficial uses that connect the public to the water.

- EVIDENCE:** a) In August 2023, Lindberg Geologic Consulting assessed the hydrologic connectivity of the Jelly Bean, Cow Knoll, and Honey wells with any adjacent wells, wetlands, and/or surface waters and if pumping the well would significantly impact nearby wells, wetlands, and/or surface waters (Hydrologic Isolation from Surface Waters Reports for Jelly Bean, Cow Knoll, and Honey Wells, respectively, (Attachment 3 - Appendices 2V, 2W, and 2X). According to the Reports, the aquifer for all three wells would be recharged by water infiltrating through the soil and mélange bedrock from source areas proximal to the well site and also ephemeral streams in the vicinity when they flow during runoff generating storm events in the winter wet season. Mean annual precipitation listed by the NRCS is between 49 to 90 inches per year. Cow Knoll, Jelly Bean, and Honey well are set within well-drained soils with a depth to the water table greater than 80 inches (Burgsblock-Coolyork-Tannin complex).

According to the Hydrologic Isolation from Surface Waters Reports, if, during the wet season, ten percent (10%) of the low end of mean annual precipitation, 49 inches, is absorbed by the soils/bedrock and does not run off or be lost to evapotranspiration, then approximately 162 to 235 acre-feet, or 52 to 76 MGPY, would be expected to recharge the local aquifers below the three wells. Recharge is estimated to be more than 29 acre-feet, or 9.5 MGPY within the 1000-foot radius of each well. Water use for the Proposed Project is estimated to be 1,720,250 gallons per year based on the irrigation demand (1,575,000 gallons per year) and annual employee water use (145,250 gallons per year). Therefore, groundwater recharge estimates would be greater than the Proposed Project water demand.

The Upper Larabee Creek sub watershed is 30,546 acres located within the greater Lower Eel River watershed and has a drainage area of 3,684 square miles. Projected total water demand for the proposed commercial cannabis cultivation is 1,575,000 gallons per year. Lindberg Geologic Consulting assessed the potential for hydrologic connectivity for the Cow Knoll, Jelly Bean, and Honey wells. All three resulted in a low likelihood of being diversionary in a way that would affect adjacent wells, wetlands, or surface waters in the vicinity.

The Proposed Project is not within any basin subject to the Sustainable Groundwater Management Act, and there has been no Groundwater Sustainability Agency established with authority over the area where the three permitted wells for the proposed cultivation are sited

Therefore, the Proposed Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. Impacts would be less than significant, and no mitigation would be necessary.

Since the wells were found to not be likely hydrologically connected to surface waters, the wells do not require water rights from the State Water Resources Control Board and are not subject to forbearance or water storage requirements and are also not likely to interfere with the Public Trust or substantially impair the public rights to navigation, fisheries, or water related activities or access.

DECISION

NOW, THEREFORE, based on the above findings and evidence, the Humboldt County Planning Commission does hereby:

- Adopt the Mitigated Negative Declaration for the HumSun 3, LLC Conditional Use Permit and Special Permit; and
- Adopt the Mitigation Monitoring and Reporting program; and
- Adopt the findings set forth in this resolution; and
- Approve the Conditional Use Permit and Special Permit for HumSun 3, LLC subject to the Conditions of Approval attached hereto as Attachment 1A; and

Adopted after review and consideration of all the evidence on February 6, 2025.

The motion was made by COMMISSIONER PEGGY O'NEILL and seconded by COMMISSIONER THOMAS MULDER and the following vote:

AYES: Commissioners: Noah Levy, Thomas Mulder, Peggy O'Neill, Jerome Qiriaz, Iver Skavdal

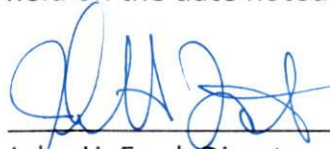
NOES: Commissioners:

ABSTAIN: Commissioners:

ABSENT: Commissioners: Lorna McFarlane

DECISION: Motion carried 5/0

I, John H. Ford, Secretary to the Planning Commission of the County of Humboldt, do hereby certify the foregoing to be a true and correct record of the action taken on the above-entitled matter by said Commission at a meeting held on the date noted above.



John H. Ford, Director
Planning and Building Department

CONDITIONS OF APPROVAL

APPROVAL OF THE PROJECT (PLN-12856-CUP) IS CONDITIONED ON THE FOLLOWING TERMS AND REQUIREMENTS:

A. General Conditions:

1. The permittee shall submit a check to the Planning Division payable to the Humboldt County Clerk/Recorder in the amount of \$3,018.75. Pursuant to Section 711.4 of the Fish and Game Code, the amount includes the CDFW fee plus the \$50 document handling fee to the Clerk. This fee is effective through December 31, 2025, at such time the fee will be adjusted pursuant to Section 713 of the Fish and Game Code. Alternatively, the permittee may contact CDFW by phone at (916) 651-0603 or through the CDFW website at www.wildlife.ca.gov for a determination stating the project will have no effect on fish and wildlife. If CDFW concurs, a form will be provided exempting the project from the \$2,968.75 fee payment requirement. In this instance, only a copy of the CDFW form and the \$50.00 handling fee is required.
2. The permittee is responsible for obtaining all necessary County and State permits and licenses, and for meeting all requirements set forth by other regulatory agencies.
3. The permittee is required to pay for permit processing on a time and material basis, as set forth in the schedule of fees and charges as adopted by ordinance of the Humboldt County Board of Supervisors. The Planning and Building Department will provide a bill to the permittee after the decision. Any and all outstanding planning fees to cover the processing of the application to decision by the Planning Commission shall be paid to the Humboldt County Planning Division, 3015 "H" Street, Eureka.
4. The permittee is responsible for costs for post-approval review for determining project conformance with conditions. A deposit is collected to cover the staff review. Permit conformance with conditions must be demonstrated prior to release of building permit or initiation of use, and at the time of annual inspection. A conformance review deposit, as set forth in the schedule of fees and charges as adopted by ordinance of the Humboldt County Board of Supervisors (currently \$1,000), shall be paid within sixty (60) days of the effective date of the permit or upon filing of the Compliance Agreement (where applicable), whichever occurs first. Payment shall be made to the Humboldt County Planning Division, 3015 "H" Street, Eureka.
5. A Notice of Determination (NOD) will be prepared and filed with the County Clerk for this project in accordance with the State CEQA Guidelines. The Department will file the NOD and will charge this cost to the project.

6. The permittee shall secure permits for all proposed structures related to the cannabis cultivation and other commercial cannabis activity. A letter or similar communication from the Building Division verifying that all structures related to cannabis cultivation are permitted will satisfy this condition.
7. The permittee shall implement and adhere to the adopted Mitigation Measures, Monitoring, and Reporting Program.
8. Implementation of Mitigation BIO-7 shall follow the guidelines and recommendations in the Wetland Mitigation Summary (J. Regan, 2024) and shall follow the monitoring and success criteria outlined in the Wetland Impacts Resulting from Proposed Development Project (NRM, 2022). By Monitoring Year 5, the wetland mitigation will be considered successful if it includes the following: (1) of 85% survival of native plantings, (2) less than 10% total absolute cover of invasive species, (3) favorable site hydrology for development of wetland soils, and (4) at least 0.09 acres of dense sedge marsh."
9. Fencing shall be installed around all botanical, wetland, and riparian mitigation/enhancement areas to prevent cattle and pigs from accessing these areas and shall remain installed for the duration of any associated monitoring period.
10. The permittee shall secure a Lake or Streambed Alteration Agreement with the California Department of Fish and Wildlife for the realignment of the Class III ephemeral drainage or any other activities that divert or obstruct the natural flow or substantially change the bed, bank or channel of any stream onsite.
11. Any existing or proposed non-county maintained access roads/driveways that will serve as access for the proposed project that connect to a county maintained road shall be improved to current standards for a commercial driveway. An encroachment permit shall be issued by the Department of Public Works prior to commencement of any work in the County maintained right of way. The access road/driveway shall be paved for a minimum width of 20 feet and a length of 50 feet where it intersects the County road.
12. If the applicant chooses to add a water well to the operation in the future, use of the well will require a determination from a qualified professional confirming that the well is not hydrologically connected to surface waters.
13. The approved building plans shall meet all applicable fire codes, including fire suppression infrastructure requirements deemed necessary for the project by the Building Inspection Division. Sign-off on the Occupancy Permit by the Building Division shall satisfy this requirement.
14. The permittee shall submit a comprehensive Light Pollution Prevention Plan for the project including all measures necessary to adhere to International Dark Sky Association

standards as set forth in the CMMLUO, demonstrating that the proposed project would not deliver or have the potential to deliver light pollution, during the hours of sunset to sunrise, affecting fish and/or wildlife directly or from a distance. The plan shall include information about any outdoor lighting utilized and measures to down-shield this lighting. The plan shall be submitted to the satisfaction of the Planning Division within six months of the effective date of this permit, or prior to use of lighting, whichever occurs first.

15. Onsite processing operations must be supported by a permanent means of sewage disposal approved by DEH. Permittee shall install a permitted onsite wastewater treatment system (OWTS), associated with a permitted structure, to support the needs of the project prior to commencement of processing activities. Seasonal cultivation operations must be supported by an approved OWTS or portable toilet(s) maintained by a permitted service provider. Permittee shall provide portable toilet(s) to cultivation areas, meeting appropriate setbacks per Humboldt County Code, or install a permitted OWTS associated with a permitted structure prior to commencement of seasonal cultivation activities.
16. The permittee shall secure enrollment in Tier 1 or 2 certification with North Coast Regional Water Quality Control Board (RWQCB) Order WQ 2019-0001-DWQ.
17. Prior to initiating commercial cannabis cultivation or associated activities the permittee shall obtain all applicable Business Licenses from the Humboldt County Tax Collector.
18. As grading is required for development on the site, the permittee is required to obtain a permit from the Building Inspection Division and the North Coast Air Quality Management District (NCAQMD). Dust control practices during construction and grading shall achieve compliance with NCAQMD fugitive dust emission standards.
19. The property owner shall execute and file with the Planning Division the statement titled, "Notice and Acknowledgment regarding Agricultural Activities in Humboldt County," ("Right to Farm" ordinance) as required by the HCC and available at the Planning Division.
20. The permittee shall be compliant with the County of Humboldt's Certified Unified Program Agency (CUPA) requirements regarding hazardous materials. A written verification of compliance shall be required before cultivation commences. Ongoing proof of compliance with this condition shall be required at each annual inspection in order to keep the permit valid.
21. The permittee shall enroll to receive power through the Redwood Coast Energy Authority (Re-Power Plus) program or a suitable equivalent source, subject to the approval of the Planning and Building Department.

22. The permittee shall secure an approval of an Air Quality Authority to Construct/Permit to Operate from the NCAQMD for the operation of the emergency backup generators.

B. Ongoing Requirements/Development Restrictions Which Must be Satisfied for the Life of the Project:

1. The combination of background, generator and greenhouse fan or other operational equipment created noise must not result in the harassment of Northern Spotted Owl species as required to meet the performance standards for noise. The combined noise levels measured at 100 feet or the edge of habitat, whichever is closer, shall be at or below 50 decibels. Conformance will be evaluated using current auditory disturbance guidance prepared by the United State Fish and Wildlife Service, and further consultation where necessary. A building permit shall be obtained should any structures be necessary for noise attenuation.
2. All artificial lighting shall be fully contained within structures such that no light escapes (e.g., through blackout curtains). Structures shall be enclosed between 30 minutes prior to sunset and 30 minutes after sunrise to prevent disruption to crepuscular wildlife. Security lighting shall be motion activated and comply with the International Dark-Sky Association standards and Fixture Seal of Approval Program; see: <https://www.darksky.org/our-work/lighting/lighting-for-citizens/lighting-basics/>. Standards include but are not limited to the following, 1) light shall be shielded and downward facing, 2) shall consist of Low-Pressure Sodium (LPS) light or low spectrum Light Emitting Diodes (LED) with a color temperature of 3000 kelvins or less and 3) only placed where needed.
3. Should the Humboldt County Planning Division receive complaints that the lighting or noise is not complying with the standards listed above in items B.1. and B.2., within ten (10) working days of receiving written notification that a complaint has been filed, the permittee shall submit written verification that the lights' shielding, and alignment and noise levels have been repaired, inspected, and corrected as necessary.
4. The permittee shall utilize water meters to demonstrate that there is sufficient water supply to meet the demands of the project. The water use for cultivation is limited to the maximum estimated amount described in the Operations Plan and annual water use records shall be provided prior to or during the annual inspection.
5. The use of synthetic netting is prohibited. To minimize the risk of wildlife entrapment, the permittee shall not use any cultivation or erosion control materials that contain synthetic (e.g., plastic or nylon) netting, including photo- or biodegradable plastic netting. Geotextiles, fiber rolls, and other erosion control measures shall be made of

loose-weave mesh, such as jute, hemp, coconut (coir) fiber, or other products without welded weaves.

6. Sight visibility must be maintained at the driveway entrance(s) and the county road [reference: County Code section 341-1 et seq.].
7. All refuse shall be always contained in wildlife proof storage containers and disposed at an authorized waste management facility.
8. Should any wildlife be encountered during work activities, the wildlife shall not be disturbed and shall be allowed to leave the work site unharmed.
9. The use of anticoagulant rodenticide is prohibited.
10. The permittee shall maintain enrollment in Redwood Coast Energy Authority (Re-Power Plus) or a suitable equivalent and shall provide copies of energy bills confirming enrollment at each annual inspection to keep the permit valid.
11. The operator shall provide information to all employees about the potential health impacts of cannabis use on children. Information shall be provided by posting the brochures from the Department of Health and Human Services titled "Cannabis Palm Card" and "Cannabis Rack Card." This information shall also be provided to all employees as part of the employee orientation.
12. All components of the project shall be developed, operated, and maintained in conformance with the Project Description, the approved Site Plan, the Plan of Operations, and these conditions of approval. Any changes shall require modification of this permit except where consistent with Humboldt County Code Section 312-11.1, Minor Deviations to Approved Plot Plan. If offsite processing is chosen to be the preferred method of processing, this permit shall be modified to identify the offsite licensed facility.
13. Cannabis cultivation and other commercial cannabis activity shall be conducted in compliance with all laws and regulations as set forth in the CMMLUO and Medicinal and Adult-Use Cannabis Regulation and Safety Act (MAUCRSA), as applicable to the permit type.
14. The permittee shall have possession of a current, valid required license, or licenses, issued by any agency of the State of California in accordance with MAUCRSA, and regulations promulgated thereunder, as soon as such licenses become available.
15. The permittee shall ensure confinement of the area of cannabis cultivation, processing, manufacture, or distribution to the locations depicted on the approved site plan. The

commercial cannabis activity shall be set back at least 30 feet from any property line and 600 feet from any school, school bus stop, church or other place of religious worship, or tribal cultural resources, except where a reduction to this setback has been approved pursuant to Section 314-55.4.11(d) of the CMMLUO.

16. The permittee shall maintain enrollment in Tier 1 or 2, certification with North Coast Regional Water Quality Control Board (RWQCB) Order WQ 2019-0001-DWQ, if applicable, or any substantially equivalent rule that may be subsequently adopted by the County of Humboldt or other responsible agency.
17. The permittee shall consent to an annual on-site compliance inspection, with at least 24 hours prior notice, to be conducted by appropriate County officials during regular business hours (Monday through Friday, 9:00 a.m. to 5:00 p.m., excluding holidays).
18. The permittee shall pay all applicable fees for application review to ensure conformance with conditions and annual inspection fees.
19. Fuel shall be stored and handled in compliance with applicable state and local laws and regulations, including the County of Humboldt's Certified Unified Program Agency (CUPA) program, and in such a way that no spillage occurs.
20. Fertilizer, pesticide, fungicide, rodenticide, or herbicide shall be properly stored, handled and used in accordance with applicable regulations.
21. The master logbooks maintained by the permittee to track production and sales shall be maintained for inspection by the County.
22. The permittee shall pay all applicable taxes as required by the Humboldt County Commercial Marijuana Cultivation Tax Ordinance (Humboldt County Code Section 719-1 et seq.).

Performance Standards for Cultivation and Processing Operations

23. Pursuant to Business and Professions Code section 26051.5(a)(8), a permittee seeking a cultivation license shall "provide a statement declaring the permittee 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."
24. Cultivators shall 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, the California Agricultural Labor Relations Act, and the Humboldt County Code (including the Building Code).

25. Cultivators engaged in processing shall comply with the following Processing Practices:
- a. Processing operations must be maintained in a clean and sanitary condition including all work surfaces and equipment.
 - b. Processing operations must implement protocols which prevent processing contamination and mold and mildew growth on cannabis.
 - c. Employees handling cannabis in processing operations must have access to facemasks and gloves in good operable condition as applicable to their job function.
 - d. Employees must wash hands sufficiently when handling cannabis or use gloves.
26. All persons hiring employees to engage in commercial cannabis cultivation and processing shall comply with the following Employee Safety Practices:
- a. Cultivation operations and processing operations must implement safety protocols and provide all employees with adequate safety training relevant to their specific job functions, which may include:
 - (1) Emergency action response planning as necessary;
 - (2) Employee accident reporting and investigation policies;
 - (3) Fire prevention;
 - (4) Hazard communication policies, including maintenance of material safety data sheets (MSDS);
 - (5) Materials handling policies;
 - (6) Job hazard analyses; and
 - (7) Personal protective equipment policies, including respiratory protection.
 - b. Cultivation operations and processing operations must visibly post and maintain an emergency contact list which includes at a minimum:
 - (1) Operation manager contacts;
 - (2) Emergency responder contacts; and
 - (3) Poison control contacts.
 - c. At all times, employees shall have access to safe drinking water and toilets and handwashing facilities that comply with applicable federal, state, and local laws and regulations. Plumbing facilities and water source must be capable of handling increased usage without adverse consequences to neighboring properties or the environment.
 - d. Onsite housing provided to employees shall comply with all applicable federal, state, and local laws and regulations.

27. All cultivators shall comply with the approved processing plan as to the following:
- a. Processing practices
 - b. Location where processing will occur
 - c. Number of employees, if any
 - d. Employee Safety Practices
 - e. Toilet and handwashing facilities
 - f. Plumbing and/or septic system and whether or not the system is capable of handling increased usage
 - g. Drinking water for employees
 - h. Plan to minimize impact from increased road use resulting from processing
 - i. Onsite housing, if any

28. Term of Commercial Cannabis Activity Permit. Any Commercial Cannabis Activity Permit issued pursuant to the CMMLUO shall expire one (1) year after date of issuance, and on the anniversary date of such issuance each year thereafter, unless an annual compliance inspection has been conducted and the permittees and the permitted site have been found to comply with all conditions of approval.

If the inspector or other County official determines that the permittees or site do not comply with the conditions of approval, the inspector shall serve the permit holder with a written statement identifying the items not in compliance, and the action that the permit holder may take to cure the noncompliance, or file an appeal within ten (10) days of the date that the written statement is delivered to the permit holder. Personal delivery or mailing the written statement to the mailing address listed on the application by regular mail, plus three (3) days after date of mailing, shall constitute delivery. The permit holder may request a re-inspection to determine whether or not the permit holder has cured all issues of noncompliance. Failure to request re-inspection or to cure any items of noncompliance shall terminate the permits, immediately upon the expiration of any appeal period, or final determination of the appeal if an appeal has been timely filed pursuant to Section 314-55.4.13 of the CMMLUO.

29. Permit Renewals to Comply with Updated Laws and Regulations. Permit renewal is subject to the laws and regulations effective at the time of renewal, which may be substantially different than the regulations currently in place and may require the submittal of additional information to ensure that new standards are met.
30. Acknowledgements to Remain in Full Force and Effect. Permittee 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 in which the cultivation area is located, will not support diversions for irrigation.

31. Transfers. Transfer of any leases or permits approved by this project is subject to the review and approval of the Planning Director for conformance with CMMLUO eligibility requirements and agreement to permit terms and acknowledgments. The fee for required permit transfer review shall accompany the request. The request shall include the following information:
 - a. Identifying information for the new owner(s) and management as required in an initial permit application;
 - b. A written acknowledgment by the new owner in accordance as required for the initial permit application;
 - c. The specific date on which the transfer is to occur;
 - d. Acknowledgement of full responsibility for complying with the existing permit; and
 - e. Execution of an Affidavit of Non-diversion of Commercial Cannabis.
32. Inspections. The permit holder and subject property owner are to permit the County or representative(s) or designee(s) to make inspections at any reasonable time deemed necessary to assure that the activities being performed under the authority of this permit are in accordance with the terms and conditions prescribed herein.

Informational Notes:

1. The permittee shall implement the Inadvertent Discovery Protocol. If cultural resources are encountered during construction activities, the contractor onsite shall cease all work in the immediate area and within a 50-foot buffer of the discovery location. A qualified archaeologist and the appropriate Tribal Historic Preservation Officer(s) are to be contacted to evaluate the discovery and, in consultation with the permittee and the lead agency, develop a treatment plan in any instance where significant impacts cannot be avoided. Prehistoric materials may include obsidian or chert flakes, tools, locally darkened midden soils, groundstone artifacts, shellfish or faunal remains, and human burials. If human remains are found, California Health and Safety Code 7050.5 requires that the County Coroner be contacted immediately at 707-445-7242. If the Coroner determines the remains to be Native American, the Native American Heritage Commission will then be contacted by the Coroner to determine appropriate treatment of the remains pursuant to Public Resources Code (PRC) Section 5097.98. Violators shall be prosecuted in accordance with PRC Section 5097.99.



HumSun 3, LLC - Mitigation Measures, Monitoring, and Reporting Program

The Department 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.

Mitigation measures were incorporated into conditions of project approval for the project. The following is a list of these measures and a verification form to ensure measures shall be met.

Mitigation Measures

AQ-1. During construction and operation, the following dust control measures shall be implemented:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, active graded areas, excavations, and unpaved access roads) shall be watered two times per day in areas of active construction.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All vehicle speeds on unpaved roads shall be limited to 15 mph, unless the unpaved road surface has been treated for dust suppression with water, rock, wood chip mulch, or other dust prevention measures.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes. Clear signage shall be provided for construction workers at all access points.
- All construction and operation equipment shall be maintained and properly tuned in accordance with the manufacturer's specifications.

Implementation Time Frame	Party Responsible for Implementation	Party Responsible for Verification	Form of Verification	Date of Verification	Verified/ Comments
During construction activity and project operations (ongoing)	Applicant	Humboldt County Planning and Building Department in consultation with North Coast Air Resources Control Board	Inspection Report		

BIO-1. Prior to the commencement of construction activities for stormwater treatment, wetland enhancement, and wetland mitigation, a qualified botanist shall survey the northern/northwestern area of the Proposed Project Area for the locally-rare Howell's yampah (*Perideridia howellii*). Any identified species shall be flagged and either not disturbed during land-disturbing activities, or if they cannot be avoided, the Howell's yampah shall be relocated or replanted at a 1:1 ratio. A relocation/replanting/monitoring plan shall be developed by a qualified botanist and submitted to the Humboldt County Planning and Building Department prior to disturbance.

Implementation Time Frame	Party Responsible for Implementation	Party Responsible for Verification	Form of Verification	Date of Verification	Verified/ Comments
No more than one week prior to ground disturbing activities	Qualified Biologist	Humboldt County Planning and Building Department in consultation with the California Department of Fish and Wildlife	Qualified Biologist will prepare report		

BIO-2. The use of anticoagulant rodenticides shall be prohibited.

Implementation Time Frame	Party Responsible for Implementation	Party Responsible for Verification	Form of Verification	Date of Verification	Verified/ Comments
Life of the Proposed Project	Applicant	Humboldt County Planning and Building Department	Inspection Report		

BIO-3. For construction related and land disturbance activities that take place within the nesting season, accepted as March 15th – August 15th, a pre-construction special status nesting bird survey shall be conducted by a qualified biologist for a minimum of one day within the 7-day period prior to vegetation removal and ground disturbing activities and a buffer zone determined by the qualified biologist, depending on the species nesting. This Mitigation Measure applies to construction / land disturbance within in the Proposed Project Area, and to water tank installation/placement on the ridge. If ground disturbance and vegetation removal work lapses for seven days or longer during the breeding season, a supplemental avian pre-construction survey shall be conducted by a qualified biologist before project work is reinitiated. If active nests are found within the construction footprint or within 500-feet of construction activities, the biologist shall flag a buffer around each nest. If nests are documented outside of the disturbance footprint and within 500-feet of the construction area, the biologist will determine the buffer size. Buffer size for common species would be determined with CDFW. Within this buffer zone, no construction shall take place until the qualified biologist determines that the young have fledged, or nesting activity has ceased.

If active nests are detected during the survey, the qualified biologist shall monitor all nests at least once per week to determine whether birds are being disturbed and which activities might disturb nesting activities, which shall be prohibited within the buffer zone until a determination is made. If signs of disturbance or distress are observed, the qualified biologist shall immediately implement adaptive measures to reduce disturbance.

Implementation Time Frame	Party Responsible for Implementation	Party Responsible for Verification	Form of Verification	Date of Verification	Verified/ Comments

No more than one week prior to ground disturbing activities, if occurring between March 15 th and August 15 th	Qualified Biologist	Humboldt County Planning and Building Department in consultation with the California Department of Fish and Wildlife	Qualified Biologist will prepare report		
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BIO-4. Once cultivation operations that use fans commence, noise monitoring shall occur monthly during the NSO nesting season (once per month from April - August). Monitoring shall be conducted for eight (8) hours, once per month, to capture the noise produced on a typical operational day. The average of the 8-hour noise measurements shall be calculated and recorded. Noise readings shall be taken using an accurate decibel reader that has the capacity to store and output recorded data. Data outputs shall include the sound pressure measurements, the average of the minimum 8-hour measurement, and the date, time, and duration of monitoring. Readings shall occur at the edge of tree line, located at 40.310680°, -123.660347° and shown in Figure 21. Copies of the readings from the monitor shall be kept on file and delivered to the Humboldt County Planning and Building Department at the end of the operational season, prior to December 31st of the operational year.

Noise readings shall be required during the first year of operation with fans. If data demonstrates that noise pressure from the operation is below 50 dB, noise monitoring shall not be required for subsequent years of operation with the same equipment. If equipment or cultivation techniques are changed, noise monitoring shall again resume for the first year of operation with the new equipment.

If noise readings indicate an average daily sound pressure of greater than 50 decibels at the monitoring location, measures shall immediately be taken to reduce noise levels. Measures shall include reducing the power output on fans within greenhouses, reducing the number of fans, installing noise-dampening barriers (e.g., greenhouse covers), or other applicable sound-reducing actions. Follow-up monitoring shall occur the day after measures have been implemented. The initial noise level readings exceeding 50 decibels, implemented correction measures, and resulting sound pressure shall be documented, and submitted to the Planning and Building Department within ten days of acknowledgement of the noise issue.

Implementation Time Frame	Party Responsible for Implementation	Party Responsible for Verification	Form of Verification	Date of Verification	Verified/ Comments
Once a month, or as needed from May – August, for a minimum period of 8 hours	Qualified Biologist or Engineer	Humboldt County Planning and Building Department in consultation with the California Department of Fish and Wildlife	Qualified Biologist or Engineer will prepare report		

BIO-5. Pre-construction surveys for amphibians and reptile species shall be conducted within one week prior to ground disturbance within the Proposed Project Area, with a qualified biologist familiar with Northern Red-legged Frog and Western Pond Turtle identification. Any identified individuals shall be relocated to suitable habitat, away from construction activities. If, during construction a Northern Red-legged Frog or Western Pond Turtle is observed in an active construction zone, construction activities shall halt in the observation area and the frog(s) shall be moved to a safe location in a similar habitat outside of the construction zone.

Implementation Time Frame	Party Responsible for Implementation	Party Responsible for Verification	Form of Verification	Date of Verification	Verified/ Comments
No more than one week prior to ground disturbing activities	Qualified Biologist	Humboldt County Planning and Building Department in consultation with the California Department of Fish and Wildlife	Qualified Biologist will prepare report		

BIO-6. Bat surveys, Sonoma Tree Vole, and West Coast DPS Fisher surveys shall be conducted by a qualified biologist within seven (7) days prior to the start of construction in areas where potential roosts or foraging habitat may be disturbed/removed. Surveys shall be conducted by a qualified biologist. Surveys shall include a visual inspection of the trees surrounding the Proposed Project Areas, with particular interest in large trees/snags with cavities or loose bark. If the presence of a bat roost or Sonoma tree vole nest is identified, tree removal shall be prohibited and no activity generating significant noise shall occur within 300 feet of the roost.

Implementation Time Frame	Party Responsible for Implementation	Party Responsible for Verification	Form of Verification	Date of Verification	Verified/ Comments
No more than one week prior to ground disturbing activities	Qualified Biologist	Humboldt County Planning and Building Department in consultation with the California Department of Fish and Wildlife	Qualified Biologist will prepare report		

BIO-7. Wetland mitigation shall follow the guidelines and site-specific recommendations in the Wetland Mitigation Summary (J. Regan Consulting, 2024). In total, 2.63 acres (114,562.8 sq. ft.) of wetland mitigation shall be provided for the 0.87 acres of unavoidable wetland impacts from the Proposed Project. The 3:1 mitigation ratio will create 0.88 acres (38,753 sq. ft.) of new wetlands, an additional 0.20 acres (8,778 sq. ft.) of wetland enhancement, 0.45 acres (19,602 sq. ft.) of riparian enhancement and approximately 1.1 acres (46,354 sq. ft.) of new stream riparian enhancement.

Implementation Time Frame	Party Responsible for Implementation	Party Responsible for Verification	Form of Verification	Date of Verification	Verified/ Comments
Within 3 years of Project Approval	Qualified Biologist	Humboldt County Planning and Building Department in consultation with the California Department of Fish and Wildlife	Qualified Biologist will prepare report		

BIO-8. California oat grass (*Festuca idahoensis* – *Danthonia californica*) shall be mitigated as described in the “Update to *Festuca idahoensis*-*Danthonia californica* Herbaceous Alliance” Memorandum prepared by NorthPoint Consulting Group, 2024. Any impacted California oat grass stand shall be mitigated at a 2:1 ratio. A minimum of 0.42 acres, or a higher area, adjusted for additional unforeseen impacts, of the existing stand of low-quality *Danthonia sp.* located on the Mid-Ridge Site shall be enhanced through (1) removal of invasive species with a Cal-IPC rank of High or Moderate, and (2) installation of wildlife-proof fencing to prevent additional cattle and feral pig impacts. Enhancement shall occur until the success criteria of establishment of a 0.42-acre “high quality” *Festuca idahoensis*-*Danthonia californica* stand with a minimum of 30% *Danthonia californica* cover and no greater than 10% invasive species cover.

A qualified botanist or restoration specialist shall perform annual monitoring to ensure progress toward the success criteria is being made. Monitoring visits and invasive species maintenance shall be conducted within the same three-week period at the end of May or beginning of June. A minimum of three (3) years of monitoring shall occur, or until the target area reaches the success criteria described above.

A Monitoring Report shall be submitted annually to the Planning Department by December 31st of each monitoring year. The Annual Monitoring Report shall include:

1. A summary of maintenance and enhancement done that year
2. Description of site conditions
3. Monitoring methods used
4. Photos and photo points
5. Discussion of any needed corrective actions or proposed method changes
6. Results of Annual Monitoring, including total absolute cover estimates for vegetative cover plots, total absolute cover estimates for native herbaceous cover where applicable, absolute cover of target invasive species within the target area, analysis and discussion of progress towards meeting Success Criteria.

Implementation Time Frame	Party Responsible for Implementation	Party Responsible for Verification	Form of Verification	Date of Verification	Verified/ Comments
Five years	Qualified Biologist	Humboldt County Planning and Building Department in consultation with the	Qualified Biologist will prepare report		

		California Department of Fish and Wildlife			
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CUL-1. If cultural materials for example: chipped or ground stone, historic debris, building foundations, or bone are discovered during ground-disturbance activities, work shall be stopped within 50-foot buffer of the discovery location, per the Cultural Resources Investigation Report. Work near the archaeological find(s) shall not resume until a professional archaeologist, who meets the Secretary of the Interior's Standards and Guidelines, has evaluated the materials and offered recommendation for further action.

If human remains are discovered during project construction, work would be stopped at the discovery location, within 20 meters (66 feet), and any nearby area reasonably suspected to overlie adjacent to human remains (Public Resources Code, Section 7050.5). The Humboldt County coroner would 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 would contact the NAHC. The descendants or most likely descendants of the deceased would be contacted, and work would 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	Party Responsible for Implementation	Party Responsible for Verification	Form of Verification	Date of Verification	Verified/ Comments
During construction activity and project operations	Applicant and, if necessary, a qualified professional archaeologist	Humboldt County Planning and Building Department in consultation Tribal governments, if necessary	If needed, the qualified professional archaeologist will prepare a Compliance Report.		

CUL-2. The applicant shall follow all applicable conditions listed for Resource HS-S1 (Windy Ridge) and Resource HS -S2 (Secret Knoll), as outlined in the Cultural Resource Inventory Report (CRIR) prepared by DZC Archaeology & Cultural Resource Consulting, LLC, developed in March 2020, as adjusted to the currently Proposed Project. The specific applicable conditions are as follows:

- All surface and subsurface cannabis cultivation and related activities are prohibited within 100 feet of the recorded boundaries of HS-S1 and HS-S2. The resource site boundary and 100-ft. resource buffer are identified in Appendix H of the **confidential** CRIR.
- Survey whiskers shall be placed across and within the roadbed at the 100 ft. resource buffer to denote entrance to the resource protective buffer. These shall be replaced as needed to maintain boundary identification. Annual replacement is recommended.

- The road-bed bisecting HS-S1 and HS-S2 shall be capped using No. 2 base rock to a depth of 4 inches within the resource site boundary, the 100-ft. site buffer, and for an additional 100 ft. outside of the site buffer, on both the east and west road approaches to the site. The mitigated road segments are identified in Appendix H of the **confidential** CRIR.
- No blading or road maintenance shall occur outside of the existing road prism within the identified site boundary or mitigated road extent of HS-S1 and HS-S2.
- Should major road repairs be required within the site boundary or 100 ft. buffer, an archaeological monitor shall be present.

Implementation Time Frame	Party Responsible for Implementation	Party Responsible for Verification	Form of Verification	Date of Verification	Verified/ Comments
During construction activity and project operations	Applicant and, if necessary, a qualified professional archaeologist	Humboldt County Planning and Building Department in consultation Tribal governments, if necessary	If needed, the qualified professional archaeologist will prepare a Compliance Report.		

EN-1. Power supply shall be developed to support the scale of the Proposed Project during phased build out. Mixed-light cultivation shall not occur until required power sourced from a renewable source is brought to the site (e.g., installation of solar power or completion of a PG&E upgrade). Prior to the onset of power, proposed cultivation shall be outdoor cultivation cultivated using light-deprivation techniques in greenhouses. At no point in time shall onsite activities exceed existing site power capacity.

Implementation Time Frame	Party Responsible for Implementation	Party Responsible for Verification	Form of Verification	Date of Verification	Verified/ Comments
During construction activity and project operations	Applicant	Humboldt County Planning and Building Department in consultation	Inspection report		

GEO-1. If paleontological resources are encountered during implementation of the Project, ground disturbing activities will be temporarily redirected from the vicinity of the find. A qualified paleontologist shall be retained by the developer to make an evaluation of the find. If a significant paleontological resource(s) is discovered on the property, the qualified paleontologist shall develop a plan of mitigation which shall include salvage excavation and removal of the find, removal of sediment from around the specimen (in the laboratory), research to identify and categorize the find, curation in the find a local qualified repository, and preparation of a report summarizing the find.

Implementation Time Frame	Party Responsible for Implementation	Party Responsible for Verification	Form of Verification	Date of Verification	Verified/ Comments
During construction activity and project operations	Applicant and, if necessary, a qualified paleontologist	Humboldt County Planning and Building Department in consultation Tribal governments, if necessary	If needed, the qualified paleontologist will prepare a Compliance Report		



HUMSUN 3, LLC
APN: 217-253-001
APPLICATION PLN-12856-CUP
CULTIVATION AND OPERATIONS MANUAL
HUMBOLDT COUNTY, CA

COMMERCIAL CANNABIS
CULTIVATION FACILITIES

PREPARED FOR:



UPDATED September 2024

Commercial Cannabis Cultivation Facilities

APN: 217-253-001

Lead Agency:

Humboldt County Planning Department

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CULTIVATION AND OPERATIONS MANUAL

HUMSUN 3, LLC

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1. PROJECT SUMMARY

1.1. PROJECT OBJECTIVE

HumSun 3, LLC ("Applicant") is applying for a Conditional Use Permit on one legal parcel comprised of Assessor Parcel Numbers (APN) 217-051-001, 217-052-001, 217-053-002, 217-055-002, 217-056-001, 217-061-001, 217-062-003, 217-213-003, 217-214-001, and 217-253-001 (Notice of Merger Record No. PLN-2018-010363) through the County of Humboldt's Commercial Medical Marijuana Land Use Ordinance (CMMLUO) also known as "Ordinance 1.0" in Blocksburg, unincorporated Humboldt County, California.

The Applicant is proposing to permit 3.1 acres (134,850 square feet [sq ft]) of mixed light cultivation area in approximately 38 greenhouses that would be approximately 30 ft. in width and a range of 70 ft. to 145 ft. in length. The project proposal includes the development of ancillary structures for cultivation activities, including a 60' x 100' dry barn for drying and curing from the summer to fall season and could be shared by the nursery from late winter to early spring, and a 32' x 40' commercial building for processing product grown onsite. The 32' x 40' commercial processing building would include an ADA-compliant restroom to be used by employees.

Energy use would require a proposed electrical upgrade from PG&E and roof-mounted solar on the proposed buildings. While waiting for the PG&E upgrade and prior to build-out of the full mixed-light greenhouses, the Applicant proposes to cultivate the 3.1 acres using light deprivation or outdoor cultivation techniques, which would not require artificial lighting for cultivation.

Water for the project will be sourced from three (3) permitted and non-diversionary onsite groundwater wells and another groundwater well drilled in the future, if deemed to be non-diversionary. The three existing wells, Cow Knoll, Jelly Bean, and Honey well would be pumped using existing solar on the well and gravity fed to proposed water storage tanks for a total of 250,000 gallons. There would be a maximum number of 18 employees during peak operations, with 8 employees during all other times. An associated new onsite wastewater treatment system would provide sufficient treatment for employees.

The Applicant aims to become fully compliant with State and Local cultivation regulations.

1.2. SITE DESCRIPTION

The project site is located on one legal parcel that includes APN 217-051-001, 217-052-001, 217-053-002, 217-055-002, 217-056-001, 217-061-001, 217-062-003, 217-213-003, 217-214-001, and 217-253-001 in the Blocksburg area, on the west side of Alderpoint Rd, on the property known as 30855 Alderpoint Road in unincorporated Humboldt County. The notice of merger was completed through the Humboldt County Planning Department to merge the property into the current legal parcel shape (Record No. PLN-2018-010363). All proposed development would occur within the one legal parcel.

The 1,887-acre parcel has undulating topography, with slopes between 0% and upwards of 30%. All development is slated for slopes of less than 15%. The parcel contains grassland, oak woodlands, early mature and mid mature Douglas fir, and riparian habitats. The project site's historic uses include agricultural, cattle grazing, recreation, residential and timber harvesting operations. Current uses include grazing, residential, and timber harvesting operations. The project parcel is an actively managed timber operation under Cemetery Road Timber Harvest Plan (Record 1-23-00157-HUM) and was logged in 2024. The parcel is under a Williamson Act Contract as an agriculture preserve in which proposed cultivation operations would be considered compatible use. The cultivation area and approximately 500 acres of the parcel are in the Upper Larabee Creek HUC-12 subwatershed within

the greater Lower Eel planning watershed, and the remaining 500 acres of the parcel is in the Basin Creek-Eel River HUC-12 subwatershed within the greater Middle Main Eel planning watershed.

The subject property has an existing residence, a permitted septic and leach field system, four (4) permitted wells, a 5000-gallon hard-sided water tank, and two barns to support the current cattle operations. Cow Knoll, Jelly Bean, and Honey Well would be used for proposed cultivation and employee use whereas the Meadow Well would not be used for cannabis cultivation purposes. An additional well is proposed for cultivation if the well is deemed non-diversionary.

There are at least 58.4 acres of prime agricultural soil located on the legal parcel, including on the field proposed for cultivation development (Appendix A – Site Plans). The proposed 3.1 acres of cultivation area will account for approximately 5% of the mapped prime agricultural soils.

1.3. LAND USE

The property is zoned Agriculture Exclusive (AE-B-5(160)) and Timber Production Zone (TPZ) and has a General Plan Use Designation of Agricultural Grazing (AG) and Residential Agriculture (RA20). Proposed cultivation would occur in the AE zone and not in the TPZ. Surrounding properties are zoned Special Building Site Combining District of Forest Recreation (FR-B-5(40)), Agriculture Exclusive (AE-B-5(160)), and Timber Production Zone (TPZ). Surrounding land use designations adjacent to the property are Agricultural Grazing, and Residential Agriculture (RA40, RA20).

1.4. STATE AND LOCAL COMPLIANCE

1.4.1. DEPARTMENT OF CANNABIS CONTROL – CALCANNABIS

HumSun 3, LLC will obtain a Commercial Cannabis Activity license from the Department of Cannabis Control once local authorization has been obtained.

1.4.2. STATE WATER RESOURCES CONTROL BOARD – WATER RIGHTS

No diversionary water source is proposed for this project. Water is proposed to be sourced from a combination of three (3) existing permitted wells: Jelly Bean (WCR2017-001709), Cow Knoll (WCR2017-001697), and Honey (WCR2017-001712). An additional well is proposed as will be used for the cultivation if the well is deemed non-diversionary.

1.4.3. STATE WATER RESOURCES CONTROL BOARD AND NORTH COAST REGIONAL WATER QUALITY CONTROL BOARD – WATER QUALITY

The applicant will enroll for coverage as a Tier 2, Low Risk under the SWRCB General Order WQ 2019-0001-DWQ *General Waste Discharge Requirements and Waiver of Waste Discharge Requirements for Dischargers of Waste Associated with Cannabis Cultivation Activities* Order. The purpose of the SWRCB Order is to implement the requirements for waste discharges associated with cannabis cultivation as described in SWRCB's *Cannabis Cultivation Policy – Principles and Guidelines for Cannabis Cultivation*. Prior to the commencement of cultivation operations, a Site Management Plan will be developed for the property to describe how the discharger is complying with the applicable Best Practicable Treatment or Control (BPTC) Measures listed in Attachment A of the Order/Policy.

The Tier 2, Low Risk discharger status reflects the proposed operations will disturb more than one acre. The applicant's proposal will keep all cultivation activities out of riparian and wetland setbacks to obtain Low Risk status with SWRCB.

1.4.4. HUMBOLDT COUNTY BUILDING DEPARTMENT

Upon project approval, all necessary building permits will be obtained from the Humboldt County Building Department for all existing/proposed structures and supporting infrastructure.

1.4.5. CAL FIRE AND FIRE PROTECTION

The subject property is located within a State Responsibility Area and Alderpoint Volunteer Fire Company for fire protection. Proposed improvements include management of trees and vegetation around existing structures to maintain the required 100-foot defensible space. All structures on the property meet the 30-foot SRA setback requirement from property lines. The project proposes a designated emergency turnaround and one (1) 5,000-gallon water tank dedicated to SRA emergency response (Appendix A – Site Plans). If needed, risers to SRA specifications will be installed for firefighting purposes.

1.4.6. CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

A Lake and Streambed Alteration Agreement (LSAA) was issued for the original 12-acre project under 1600-2020-0389-R1. The LSAA Notification was prepared by Mother Earth Engineering (February 13, 2020) and included jurisdictional items across the entire subject parcel. In total there are 23 jurisdictional items in the LSAA, all of which include the maintenance, replacement, or installation of stream-crossing culverts on the existing ranch roads. Some of the stream crossings are located to access the existing wells, and proposed water tanks, located on the ridge. These crossings would be upgraded and maintained per the existing LSAA; they would not be impacted by the proposed project.

1.4.7. CULTURAL RESOURCES

If buried archaeological or historical resources are encountered during construction or cultivation activities, the applicant or contractor shall call all work in the immediate area to halt temporarily, and a qualified archaeologist is to be contacted to evaluate the materials. Prehistoric materials may include obsidian or chert flakes, tools, locally darkened midden soils, groundstone artifacts, dietary bone, and human burials. If human burial is found during construction, state law requires that the County Coroner be contacted immediately. If the remains are found to be those of a Native American, the California Native American Heritage Commission will then be contacted by the coroner to determine appropriate treatment of the remains. The applicant is ultimately responsible for ensuring compliance with this condition.

2. CULTIVATION AND PROCESSING**2.1. PROPAGATION AND INITIAL TRANSPLANT**

The applicants propose to propagate juvenile plants on-site from seeds and mother plants or retain clones from an offsite-licensed facility. On-site ancillary nursery propagation would not exceed 10% of the permitted cultivation acreage. In the spring months, when the proposed 60' x 100' dry barn is not in use for the drying and curing operations, nursery operations are proposed to occur. The mother plants will remain in the vegetative stage solely for propagation. Cuttings will be sampled from the mother plants and rooted into a growing medium (e.g. oasis cubes) to produce clones. When the clones reach a juvenile state, they will then be transferred to the 3.1-acre cultivation area. The juvenile plants will be irrigated using hand watering methods, and after 1-3 weeks they will continue their vegetative cycle. After 2-4 weeks juvenile plants will be dispersed throughout the cultivation area and planted into the raised beds in the flowering greenhouses.

For the artificial lighting used to assist with the enhancement of plant growth, the lights will be set on timers that activate ½ hour before sunset daily. Prior to sunset each day, blackout tarps are automatically or manually pulled over the mixed light greenhouses and nursery to prevent all light from escaping. The blackout tarps are constructed out of 2 ply-10-millimeter plastic with internal

threading for shear strength. All lighting for the proposed project would be designed and located so that light would be confined to the property and there would be no spillover to adjacent properties.

2.2. MIXED LIGHT CULTIVATION PLAN

The proposed cultivation total is 3.1 acres and water use is approximately 1,720,250 gallons per year based on irrigation and employee water use estimates. Mixed light cultivation is proposed to occur in 38 greenhouses, measured 30' in width and ranging from 70' to 150' in length. The greenhouses would consist of heavy gage steel tubing covered with a woven poly translucent opaque tarp or corrugated plastic. Greenhouses are proposed to be ventilated by intake and exhaust fans. Cultivation would occur within raised beds, in soil bags, or directly in the ground. The monthly Cultivation Schedule in Appendix B details the cultivation activities associated with the mixed light cultivation operation for a typical year and is expected to include two to three harvests per year.

Greenhouses would be fitted with automated blackout covers to ensure that mixed-light cultivation would not disturb wildlife or neighboring properties. Blackout covers would be deployed 30 minutes before sunset and 30 minutes after sunrise.

2.3. IRRIGATION PLAN AND SCHEDULE

An estimated 1,575,000 gallons of water is expected to irrigate the 3.1 acres of cultivation area (12 gal/sq ft). The monthly Cultivation Schedule in *Table 1* (Section 3.1) details the irrigation activities associated with all cultivation.

2.4. PROCESSING (HARVESTING, DRYING AND TRIMMING)

Drying and curing will occur in the summer and fall months in the proposed 60'x100' dry barn building. This building would be shared by the nursery in the late winter/early spring. All processing (trimming and packaging) will occur off-site until the 32'x40' commercial processing building is constructed.

Plants that are ready for harvest will have their flowering branches removed and placed in plastic containers and transported to the 60'x100' building where they will be suspended and left to dry for approximately one week. The dried flowers will be bucked into manageable buds and transported to an off-site processing facility until the 32'x40' processing building is constructed.

2.5. EMPLOYEE PLAN

The applicant is an "agricultural employer" as defined in the Alatorre-Zenovich-Dunlap-Berman Agricultural Labor Relations Act of 1975 (Part 3.5 of Division 2 of the Labor Code), and complies with all applicable federal, state and local laws and regulations governing California Agricultural Employers.

During construction, it is estimated that approximately 10 - 15 personnel would be needed.

2.5.1. JOB DESCRIPTIONS AND EMPLOYEE SUMMARY

- *Agent in Charge*: Responsible for business oversight and management. Responsibilities include, but are not limited to: inventory and tracking, personnel management, record keeping, budget, and liaison with State and County inspectors as needed. This is a part-time to full-time, seasonal position.
- *Lead Cultivator*: Oversight and management of the day-to-day cultivation of commercial cannabis. Responsibilities include but are not limited to: plant propagation and transplant, soil management, irrigation, fertilization, pesticide management, and harvest activities. This is a full-time, year-round position.
- *Assistant Cultivator / Processing Manager*: Provides support to the *Lead Cultivator* in their day-to-day duties and takes the lead role during times when the *Lead Cultivator* may be

off site. Once processing activities commence, the *Assistant Cultivator* duties switch to oversight and management of processing the dried commercial cannabis. This is a full-time, seasonal position.

- *Seasonal Laborer*: Provides cultivation support, harvesting, drying support and processing of cannabis. This is a part-time to full-time, seasonal position.

2.5.2. STAFFING REQUIREMENTS

In addition to the *Agent in Charge*, *Lead Cultivator*, and *Assistant Cultivator*, up to five (5) full-time staff would be required for a total of eight (8) full-time staff. The project would require up to ten (10) seasonal labor positions for peak seasonal events (e.g., planting and harvesting) at regular intervals, typically between May through December to occur approximately four (4) months out of the year. The number of seasonal laborers varies based on the needs of the farm during the cultivation and harvest. During peak operational periods, the operation may require up to eighteen (18) employees.

2.5.3. EMPLOYEE TRAINING AND SAFETY

On-site cultivation, harvesting and drying will be performed by employees trained on each aspect of the procedure including cultivation/harvesting techniques, use of pruning tools, and proper application/storage of pesticides and fertilizers. All cultivation staff will be provided with proper hand, eye, body and respiratory Personal Protective Equipment (PPE). Access to the on-site cultivation and drying facilities will be limited to authorized and trained staff. All employees will be trained in proper safety procedures including fire safety, use of PPE, proper hand washing guidelines, and emergency protocol. Contact information for the local fire department, Cal Fire, Humboldt County Sheriff and Poison Control as well as the Agent in Charge will be posted at the employee restroom. Each employee is provided with a written copy of emergency procedures and contact information. The material safety data sheets are kept on site and accessible to employees.

No manufacturing (volatile or non-volatile) is proposed in this application.

2.5.4. EMPLOYEE HYDRATION AND SANITATION

Drinking water will be sourced from the three existing wells on the property and available from the sink in the employee break room, restroom, and external taps/spigots. Using the standard 35 gallons per person per shift (Humboldt County Local Agency Management Program, 2017), the estimated total employee water use would be 145,250 gallons per year. This is a conservative estimate that considers all days of the year whereas work days would follow all applicable federal, state, and local laws and regulations governing California Agricultural Employers.

Employee drinking water and water use would be an estimated 67,760 gallons for eight (8) full-time employees during eight (8) months out of the year and 77,490 gallons for the maximum eighteen (18) employees on site during the peak season four (4) months out of the year.

Temporary portable toilets and handwashing stations will be used on site for the cultivation employees until the processing building is constructed. Cultivation employees will have access to anti-bacterial Liquid Soap and paper hand towels. Construction of a 32' x 40' commercial building for processing would include the construction of an ADA compliant restroom and a new Onsite Wastewater Treatment System used by employees. Restroom and handwashing units will be serviced at regular intervals by a licensed contractor. Work will occur at a distance no greater than 1,250 ft from the restroom facility.

2.5.5. ON-SITE HOUSING

The residential structure on the subject parcel is not part of this proposal and all employees will commute to the site. No additional housing is proposed.

2.5.6. PARKING PLAN

Parking is proposed to be located near the proposed dry barn and commercial processing building. A total of eighteen (18) parking spaces would be available, including a minimum of one (1) required ADA-parking spaces, or as required by the California Building Code (Appendix A).

2.6. SECURITY PLAN AND HOURS OF OPERATION**2.6.1. FACILITY SECURITY**

The property is accessed through an entry gate that always remains locked. Cultivation facilities (greenhouses, storage sheds, drying facility) will only be accessible through the locked gate. Access to the area is limited to employees and approved personnel including agency staff, consultants, and distributors.

2.6.2. HOURS OF OPERATION

Activities associated with cultivation in the greenhouses (watering, transplanting, and harvesting) generally occur during daylight hours. All other activities such as harvesting and drying typically occur no earlier than 7 AM and extend no later than 8 PM.

3. ENVIRONMENT**3.1. WATER SOURCE, STORAGE, AND PROJECTED USE**

Water use is estimated to be 1,720,250 gallons per year based on the irrigation demand (1,575,000 gallons per year) and annual employee water use (145,250 gallons per year). Irrigation and employee water use would be sourced from the three (3) non-diversionary permitted wells and one (1) proposed well if proven to be non-diversionary. The three existing wells, Cow Knoll, Jelly Bean, and Honey are located on the ridge at approximately 2,170 to 2,250 feet elevation within the legal parcel.

The proposed water storage is comprised of a total of 250,000-gallons in 5,000-gallon hard sided tanks. The well would be used in the winter and spring months to fill the 250,000 gallons of storage. The proposed water storage would supplement the use of the well for the cultivation season. The proposed storage is estimated to be 15% of the project demand. Refer to Section 2.3 for a summary of irrigation practices.

The table below outlines the estimated irrigation water usage for cultivation during a typical year. Variables such as weather conditions and specific cannabis strains will have a slight effect on water use.

The annual irrigation water demand is estimated to be approximately 1,575,000 gallons (12 gallons/sq ft). Table 1 outlines the estimated irrigation water usage for cultivation during a typical year. Variables such as weather conditions and specific cannabis strains will have a slight effect on water use.

Table 1: Estimated Annual Irrigation Water Usage (gallons)

Jan	Feb	Mar	April	May	June	July	Aug	Sept	Oct	Nov	Dec	Total
10,000	15,000	15,000	60,000	140,000	275,000	325,000	330,000	310,000	60,000	25,000	10,000	1,575,000

Drinking water will be sourced from the three existing wells on the property. Using the standard 35 gallons per person per shift (Humboldt County Local Agency Management Program, 2017), employee annual total water use is approximately 145,250 gallons per year: 67,760 gallons for eight (8) full-time employees during eight (8) months out of the year and 77,490 gallons for the maximum eighteen (18) employees on site during the peak season four (4) months out of the year.

3.1.1. SITE DRAINAGE, RUNOFF, AND EROSION CONTROL

The applicant will enroll with the State Water Resources Control Board (SWRCB) for coverage under the General Order. A Site Management Plan (SMP) for existing and proposed site conditions will be developed; the SMP will be updated to the proposed expansion and detail erosion control and sediment capture measures, as well as road maintenance and runoff activities.

3.1.2. STORMWATER MANAGEMENT PLAN

The proposed cultivation activities will take place in the existing flats on slopes less than 5%. Stormwater will be collected from new impervious surfaces, and conveyed to a designated bio-filtration swale. A Site Grading and Drainage Plan will address all proposed onsite grading and stormwater runoff for the development of the site (Appendix A).

Stormwater management for the remainder of the property will be addressed in the SMP, which will also include recommendations for road network maintenance. Existing and proposed structures are located over 50 feet from any watercourses, providing a sufficient buffer to prevent potential sediment or nutrient delivery.

3.1.3. EROSION CONTROL

The SMP and forthcoming Site Grading and Drainage Plan will include erosion and sediment BPTCs designed to prevent, contain, and reduce sources of sediment. Additionally, the SMP will include site-specific corrective actions to ensure property maintenance and erosion control.

3.2. WATERSHED AND HABITAT PROTECTION

All light from the nursery or from the cultivation areas shall be attenuated so that it does not create a new source of light or glare that could adversely impact local wildlife. Proposed activities would not exceed fifty (50) decibels from the nearest edge of habitat. In addition, adherence to the Site Management Plan will ensure that erosion control and sediment capture BPTC measures are in place to prohibit water quality degradation of the nearby river. Biological Resource Reports have been prepared for the site and have been included in the application.

3.3. INVASIVE VEGETATIVE SPECIES CONTROL PLAN

Once proposed cultivation activities commence, the cultivation area will be monitored for invasive species. If invasive species are located, hand tools (shovels, weed wrenches, trowels, or hand saws) may be used to remove them. The exact rate and method of invasive species removal will be determined based on the species identified. The areas of disturbance shall be surveyed and maintained twice each year, at a minimum, as part of the invasive species control plan.

The following is a partial list of websites to be used for proper identification and treatment:

1. <https://calflora.org/>
2. <https://plants.usda.gov/java/>
3. <https://www.cal-ipc.org/>
4. <https://www.cal-ipc.org/solutions/>
5. <http://www.rareplants.cnps.org/>

6. <https://www.wildlife.ca.gov/Conservation/Plants#22064102-california-native-plant-information>
7. <http://ucjeps.berkeley.edu/>
8. http://wetland-plants.usace.army.mil/nwpl_static/v33/home/home.html
9. <https://www.fws.gov/invasives/partnerships.html>

3.4. MATERIALS MANAGEMENT PLAN

3.4.1. PEST MANAGEMENT

The pest management practices to be used are as follows: clones and seeds are started with healthy pest free stock to help with clean pest free starts. Diatomaceous earth will be used in the early season and throughout the growing season. Predator nematodes will be applied periodically to the soil starting in the preseason to kill any larva and adult pests that live in the soil. Predator mites (*Amblyseius fallacis*, *Amblyseius californicus*, *Amblyseius swirskii*) will be used for mite control. *Steinernema feltiae* (beneficial nematodes) will be used on mothers and in the nurseries.

The applicant is intending to use the following pesticides (or similar): sulfur products, neem oil, other plant oils (e.g., cottonseed, clove), Green Clean, Dr. Zymes, Plant Therapy, Venerate, Regalia, and Grandevo.

3.4.2. FERTILIZERS, NUTRIENTS & SOIL AMENDMENTS

Fertilizers, nutrients, and soil amendments anticipated to be used include Earth Juice Rainbow Mix Pro Grow/Bloom, General Hydroponics Grow, gypsum, lime, dolomite, azomite, worm castings, alfalfa pellets, worm castings, compost, blood meal, bone meal, kelp, fish hydrolysate, feather meal, crab meal, and oyster shell. Pesticides anticipated to be used include biological controls, diatomaceous earth, sulfur products, neem oil, plant oils (e.g., cottonseed, clove), Green Cleaner, Dr. Zymes, Plant Therapy, Venerate, Regalia, and Grandevo, as needed. Other legal pesticides, herbicides, fertilizers, nutrients, and soil amendments similar to the above could also be used during operations. Pesticides and fertilizers would be applied directly to plants and would be applied over 675 ft from the nearest residence. The fertilizers and pesticides used by the project would primarily be stored in five-gallon containers and kept within a facility for containment.

3.4.3. PETROLEUM PRODUCTS & SOLVENTS

Petroleum products, including lubricants, gasoline and diesel, are currently stored onsite to maintain existing residential and agricultural operations (e.g. to power tools, equipment, etc.). Petroleum products associated with the project would include gasoline and diesel stored in small-quantity sealed containers (e.g. 5-gallon gas cans). All petroleum products would be stored within secondary containment. The fertilizers and pesticides used by the project would primarily be in five-gallon containers and stored within the proposed facility for containment. Refueling of small equipment (e.g. weed whacker, tools, generator, etc.) would be conducted onsite over secondary containment and greater than 150 ft from any watercourses. Refueling of larger equipment (e.g., tractor or backhoe) would be conducted offsite at a properly licensed facility. Legal cleaning solvents (e.g., bleach) would also be stored and used onsite in the proposed buildings for general site husbandry.

3.4.4. PROTOCOLS FOR PROPER STORAGE AND USE OF FERTILIZERS, PESTICIDES, AND OTHER REGULATED PRODUCTS

Cultivation, harvesting, and drying shall be performed by employees trained on each aspect of the procedure, including cultivation, and harvesting techniques, the use of pruning tools, and proper application/storage of pesticides/ and fertilizers. All cultivation and processing staff are provided with proper hand, eye, body and respiratory Personal Protective Equipment (PPE). Access to the onsite

cultivation, drying and processing facilities are limited to authorized and trained staff. Mixing of fertilizers in small storage tanks is solely conducted in a designated area (to be determined) where the mix will not enter surface waters. For young plants, the mix is applied via watering wand and mature plants are fertigated at agronomic rates by drip emitters or hand watering methods. Spent soil is amended and reused as needed. The application of any agricultural chemical products will be conducted according to the manufacturer's recommendation.

Employees are trained in usage and handling procedures of associated equipment and cleaning procedures. Chemicals and hazardous materials are only used with equipment as recommended by manufacturers. Cleaning will occur regularly with instructions based on the manufacturer's recommendations. All cleaning materials will be put away and stored properly within secondary containment when not in use and hazardous containers will be properly disposed of. Additionally, if there are any spills on site, there will be a spill kit with sorbent pads that will be accessible.

On-site inventory is kept for all chemicals. Chemicals are used and stored based on manufacturer's recommendations and requirements. Any materials required for the use of chemicals will be provided to employees. The material safety data sheets (MSDS) are kept on site and accessible to employees.

All hazardous waste will be stored within secondary containment. Additionally, a log will be kept in order to keep the volume of hazardous waste accounted for. Fertilizers and pesticides are being stored in a separate location from petroleum products. The aforementioned products will be located within secondary containment in a storage shed. No rodenticides will be used on site. At the end of the season, any unused liquid products are stored in secondary containment and will be applied the following year. Before unused products are stored at the end of the season, an employee will take inventory on the volumes and products. Additionally, all waste will be properly disposed of off-site and the correct facility. All trash, empty product containers, and recycling are hauled off-site bi-weekly to nearest licensed waste management facility.

Appropriate BPTC measures are being utilized when storing, handling, mixing, applying, and disposing of all fertilizers, pesticides, herbicides, rodenticides, or any other hazardous materials. Each year an inventory is conducted prior to the beginning of the grow season and necessary products are delivered to the site as needed.

3.5. SOILS MANAGEMENT PLAN

The applicant is proposing to plant all cultivation in raised beds, soil bags, or directly in the ground within the greenhouse structures. The applicants will account for and keep records of annual and seasonal volumes of soil imported and exported on and off site. Any purchased soils will be reamended for use the following year. During the wet season, any soil piles will be located in a flat area outside of riparian setbacks and winterized, likely with a tarp underneath the pile and straw wattles located around the pile to prevent leachate from entering surface waters. Potential spent soil will be properly disposed of off-site at an appropriate facility.

3.6. HAZARDOUS WASTE STATEMENT

There are no hazardous materials mapped onsite. A search of the EnviroSTOR database shows no GeoTracker Cleanup Programs on-site.

3.7. ENERGY PLAN

Existing electrical services would initially power the facilities. The project would obtain an electrical service upgrade from Pacific Gas & Electric (PG&E) and roof-mounted solar power would be installed on the proposed buildings. Existing electrical service includes a 200-amp residential service, and a 1600-amp 3-phase PG&E upgrade is proposed for the mixed-light cultivation (exact load calculations

to be designed by an electrical engineer). Prior to build-out of the full mixed-light greenhouses, light deprivation or outdoor cultivation techniques would be used, which would not require lighting for cultivation. Use of an on-site generator would be limited to backup and outage events and would follow all guidelines set by Humboldt County and the State of California. An on-site generator would be kept for backup purposes only; use of any on-site generators would be limited to power outage events and would follow all guidelines set by Humboldt County and the State of California.

3.8. WASTE MANAGEMENT

3.8.1. CULTIVATION

Drip irrigation methods minimize potential for overwatering plants and subsequent runoff. Waste generated from employee activities would be stored in wildlife-proof garbage cans. Organic cultivation-related waste, including root balls, branches, and leaves will be hauled off site to a green waste management facility as needed. Trash and recycling from cannabis operations, including empty soil or fertilizer bags, liquid fertilizer bottles, cultivation supplies, etc., will be taken to the nearest waste management facility as needed, likely one every two weeks. The nearest waste management facility is the Redway Transfer Station.

3.8.2. SEWAGE DISPOSAL PLAN

A temporary portable toilet and handwashing station will be provided onsite and serviced by the provider until the proposed processing facility is constructed and the associated onsite wastewater treatment is installed. Cultivation employees will have access to anti-bacterial liquid soap and paper hand towels. A private onsite wastewater treatment system would be constructed for a proposed 18 employees. Work will occur at a distance no greater than 1,250 ft from the restroom facility.

A private onsite wastewater treatment system would be constructed for a proposed 18 employees. The proposed processing facility will be required to adhere to California Building Code standards that include access and restroom facilities that meet ADA standards. A Septic Suitability Memorandum has been prepared by NorthPoint Consulting Group, Inc (August 2024). Sufficient treatment would be provided for up to 20 employees, which would support more than the maximum 18 employees at any one time.

4. PRODUCT MANAGEMENT

4.1. PRODUCT TESTING AND LABELING

Samples will be selected from individual harvested cannabis strains and tested by a licensed third-party lab in accordance with State and local standards. The finished product is labeled and will include tracking IDs provided by the California Cannabis Track-and-Trace (CCTT) METRC system.

4.2. PRODUCT INVENTORY AND TRACKING

The applicants will follow all regulations and requirements set by the CCTT-METRC system. After approval of state licenses related to the proposed cultivation, the applicants will request credentials and order unique identifiers (UIDs) which will be assigned to each immature lot, flowering plant, and distinct cannabis product.

4.3. TRANSPORTATION AND DISTRIBUTION

Transportation will be handled by a licensed transporter/distributor in accordance with State and Local regulations. All merchantable products will be distributed through licensed commercial cannabis dispensaries. The CCTT-METRC system will be used for all transactions with distributors or transporters.

APPENDIX A: SITE PLANS

PROJECT INFORMATION:

- HEAD SOUTH ON US-101 S (APPROX. 18.9 MILES)
- TAKE EXIT 685 FOR CA-36 E (APPROX. 0.3 MILES)
- TURN LEFT ONTO CA-36 E (APPROX. 23.9 MILES)
- TURN RIGHT ONTO ALDERPOINT RD. (APPROX. 16.4 MILES)
- DESTINATION ON THE RIGHT

PROJECT DESCRIPTION:

[illegible]

GENERAL NOTES:

1. COAL SAMPLE AS NOTED. WRITTEN DIMENSIONS SHALL BE PRECEDED BY NOTED SCALD DIMENSIONS.
2. THIS IS NOT A BOUNDARY SHEET. BOUNDARY INFORMATION DERIVED FROM THIS REPORT IS NOT TO BE USED FOR BOUNDARY LINES OR BOUNDARY INFORMATION. BOUNDARY INFORMATION NOT OBTAINED FROM THIS REPORT SHOULD BE OBTAINED FROM PARCEL MAPS. 15-2015-0100-000-00000
3. THERE ARE NO WEARY SCHOOLS, SCHOOLS, BUS STOPS, PLACES OF WORSHIP, PUBLIC PLACES OF RECREATION WITHIN 600 FEET OF THE PROPOSED COLTAVATION AREA.
4. THERE ARE NO RESOURCES OR ADJACENT PARCELS WITHIN 500 FEET OF THE PROPOSED COLTAVATION AREAS.
5. ANY EXISTING DEVELOPMENT CONSIDERED TO AFFECT THE BOUNDARY OF COAL SAMPLE WILL BE SUBJECT TO THE REVIEW OF THE DEVELOPMENT. ANY DEVELOPMENT OF THE CONDITIONAL USE PERMIT.

LEGEND

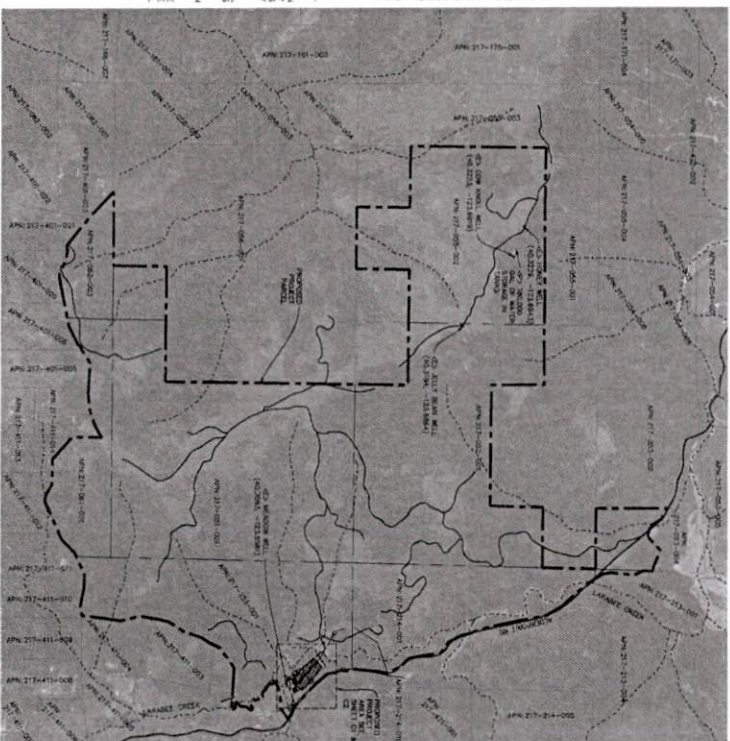
- LEGAL PARCEL BOUNDARY
- ADJACENT LOT LINE
- INTERNAL ACCESSORY PARCEL BOUNDARIES
- CLASS I, II, III WATERCOURSE BUFFER
- ROADS

PLOT PLAN

22x34 SHEET: 1"=1,000'
11x17 SHEET: 1"=2,000'

0 500 1,000 2,000

 N



SHEET INDEX:

- C0 - PLOT PLAN, VICINITY MAP, & PROJECT NOTES
- C1 - CONSTRAINTS MAP
- C2 - PROPOSED SITE PLAN
- C3 - STREAM BUFFER TYPICAL DETAIL

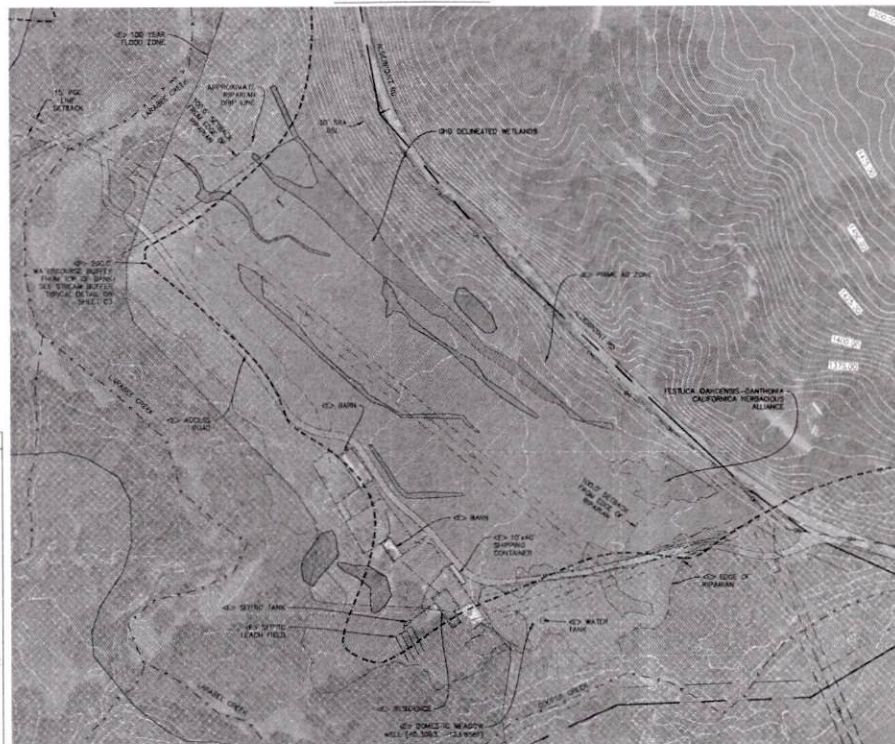
	SRA
FRONT	30'
SIDE	30'
REAR	30'

SRA AREA: = YES
IN COASTAL ZONE: = NO
IN 100 YR FLOOD ZONE: = YES

[illegible]

NORTHPOINT
CONSULTING GROUP, INC.
117 Samoa Blvd., Arcata, CA 95521

APN: 217-253-001



22x34 SHEET: 1"=80'
11x17 SHEET: 1"=160'

A horizontal graphic scale bar with tick marks at 0, 40, 80, and 160 feet. The bar is divided into segments, with the first segment (0 to 40) being a different shade than the others.

NORTHPOINT
CONSULTING GROUP, INC.
1817 Sarno Blvd., Arcata, CA 95521

HUMSUN 3, LLC - CUP
APN:217-253-001
EXISTING SITE PLAN - PROPOSED PROJECT AREA

DATE: 08/23/2024
SHEET
C1
24-001

HUMSUN 3, LLC

PROPOSED SITE PLAN - PROPOSED PROJECT AREA

APN: 217-253-001

IMPACTS TABLE:

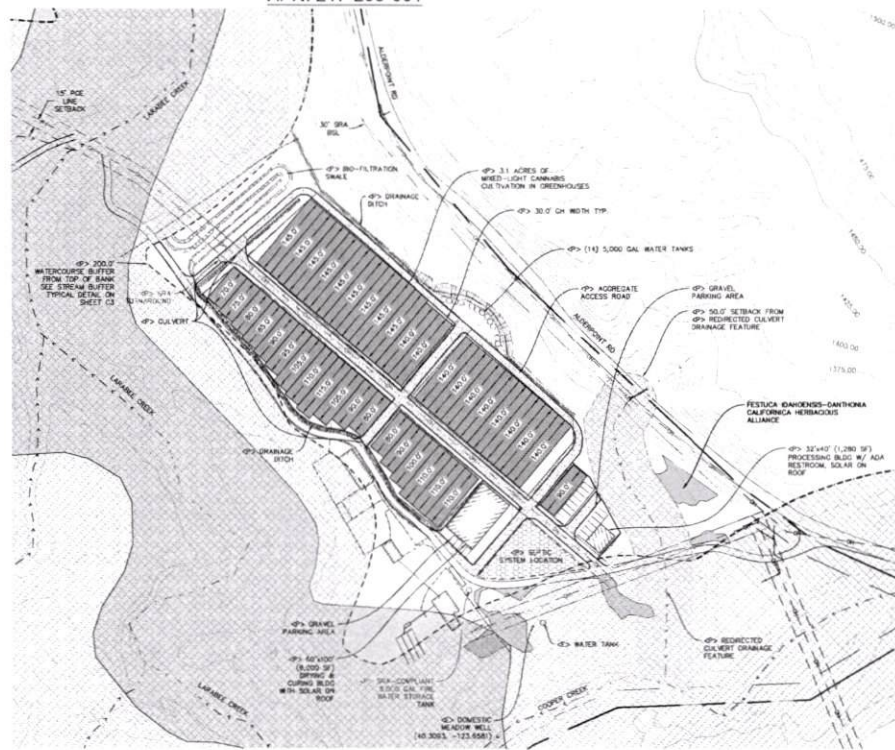
IMPACTS TO WETLANDS: 0.8 ACRES
IMPACTS TO DANTHONIA: 0.2 ACRES

GREENHOUSES TABLE:

(1)	30.0' x 70.0' GH	=	2,100	SQ.FT.
(1)	30.0' x 75.0' GH	=	2,250	SQ.FT.
(1)	30.0' x 80.0' GH	=	2,400	SQ.FT.
(1)	30.0' x 85.0' GH	=	2,550	SQ.FT.
(4)	30.0' x 90.0' GH	=	2,700	SQ.FT.
(1)	30.0' x 95.0' GH	=	2,850	SQ.FT.
(1)	30.0' x 100.0' GH	=	3,000	SQ.FT.
(2)	30.0' x 105.0' GH	=	3,150	SQ.FT.
(4)	30.0' x 110.0' GH	=	3,300	SQ.FT.
(1)	30.0' x 115.0' GH	=	3,450	SQ.FT.
(10)	30.0' x 140.0' GH	=	4,200	SQ.FT.
(9)	30.0' x 145.0' GH	=	4,350	SQ.FT.
TOTAL		=	134,850	SQ.FT.
		=	3.1	ACRES

LEGEND

- PARCEL BOUNDARY
- LOT LINE
- BUILDING SETBACK
- WATERCOURSE BUFFER
- STREAM
- PGE 15' SETBACK
- PGE OVERHEAD LINES
- FENCE
- 200' SETBACK FROM WATERCOURSE
- DANTHONIA GRASSES
- 100 YEAR FLOOD ZONE
- POTENTIAL CULTIVATION AREA
- 2.63 ACRES OF WETLAND AND RIPARIAN CREATION AND ENHANCEMENT REFER TO WETLAND MITIGATION REPORT (J. REGAN CONSULTING, 2024)



22x34 SHEET: 1"=80'
11x17 SHEET: 1"=150'



NORTHPOINT
CONSULTING GROUP, INC.
1117 Sandoz Blvd., Arcata, CA 95521

HUMSUN 3, LLC - CUP
APN: 217-253-001
PROPOSED SITE PLAN - PROPOSED PROJECT AREA

C2

OPERATIONS MANUAL

HUMSUN 3, LLC

APPENDIX B: CULTIVATION ACTIVITIES SCHEDULE

Item	Description	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Drainage, Runoff, and Erosion Control	Winterization (storage of pots/greenhouse covers)												
	Temporary Erosion Control BMP's (straw, seeding, fiber rolls, etc.)												
	Road maintenance												
	Culvert and inboard ditch maintenance/inspection												
Mixed Cultivation and Harvest Schedule	Mixed Light Cultivation Cycle												
	Harvest activities												
	Drying Activities												
Staffing Presence	Agent in Charge												
	Lead Cultivator												
	Assistant Cultivator												
	Seasonal Laborers												

APPENDIX C: REFERENCES

- Department of Toxic Substances Control. *Site Mitigation & Restoration Program*. <https://dtsc.ca.gov/your-envirostor/>. Accessed August 2024.
- Humboldt County. *Streamside Management Area Ordinance*. Title 3: Land Use and Development; Division 1, Planning Zoning Regulations; Chapter 6 – General Provisions and Exceptions; Section 314-51.1.
- Humboldt County Local Agency Management Program (LAMP). 2017. <https://humboldtgov.org/685/Land-Use-Program>
- Humboldt County Planning and Building Department. 2016. Ordinance No. 2559 – Medical Marijuana Land Use Ordinance. <https://humboldtgov.org/DocumentCenter/View/53372/Ord-No-2559-Adopted-BOS-September-13-2016?bidId=>
- Humboldt County Planning and Building Department. 2015. *Mitigated Negative Declaration*. Available at: <https://humboldtgov.org/DocumentCenter/View/53373/Final-MND---CMMLUO?bidId=>. Accessed August 2024.
- North Coast Regional Water Quality Control Board. 2016. *Cannabis Cultivation Waste Discharge Regulatory Program*. http://www.waterboards.ca.gov/northcoast/water_issues/programs/cannabis/. Date accessed: July 2024
- State Water Resources Control Board. 2019. SWRCB Cannabis General Order No. 2019-0001 – General Waste Discharge Requirements and Waiver of Waste Discharge Requirements for Dischargers of Waste Associated with Cannabis Cultivation Activities. https://www.waterboards.ca.gov/water_issues/programs/cannabis/cannabis_policy.html



VICINITY MAP
NOT TO SCALE

PROJECT DESCRIPTION:

HUMSUN 3, LLC IS APPLYING FOR A CONDITIONAL USE PERMIT ON KEY APN: 217-253-001 THROUGH THE COUNTY OF HUMBOLDT'S COMMERCIAL MEDICAL MARIJUANA LAND USE ORDINANCE (CMMLUO). THE APPLICANT SEEKS TO PERMIT 3.1 ACRES (134,850 SQ. FT.) OF MIXED LIGHT CULTIVATION AREA IN GREENHOUSES. CULTIVATION IS PROPOSED IN APPROXIMATELY 38 GREENHOUSES, 30 FEET IN WIDTH, RANGING FROM 70 FEET TO 145 FEET IN LENGTH.

THE PROJECT PROPOSAL INCLUDES THE DEVELOPMENT OF ANCILLARY STRUCTURES FOR CULTIVATION ACTIVITIES, INCLUDING A 60' X 100' BUILDING FOR DUAL USE OF ANCILLARY NURSERY, DRYING, STORAGE, AND CURING, A 32' X 40' PROCESSING BUILDING FOR ONSITE TRIMMING, WATER INFRASTRUCTURE, AND STORAGE FOR THE EXISTING WELLS AND A PROPOSED NON-DIVERSIONARY WELL.

ENERGY WILL BE SOURCED THROUGH THE EXISTING PG&E SERVICE AND A PROPOSED SOLAR SYSTEM. THE MIXED LIGHT GREENHOUSES WILL REQUIRE AN UPGRADE TO THE EXISTING PG&E SERVICE WHILE WAITING FOR THE PG&E UPGRADE, HUMSUN 3, LLC PROPOSES TO CULTIVATE THE 3.1 ACRES USING A COMBINATION OF LIGHT DEPRIVATION GREENHOUSES OR OUTDOOR CULTIVATION WITH THE EXISTING PG&E SERVICE AND PROPOSED SOLAR SYSTEM.

WATER FOR THE PROJECT WILL BE SOURCED FROM EXISTING ONSITE GROUNDWATER WELLS, OR, A GROUNDWATER WELL DRILLED IN THE FUTURE. IF DEEMED TO BE NON-DIVERSIONARY, WATER WILL NOT COME FROM SURFACE WATER DIVERSION.

GENERAL NOTES:

1. DRAWING SCALE AS NOTED. WRITTEN DIMENSIONS SHALL TAKE PRECEDENCE OVER SCALED DIMENSIONS.
2. THIS IS NOT A BOUNDARY SURVEY. BOUNDARY INFORMATION DEPICTED HAS BEEN OBTAINED FROM HUMBOLDT COUNTY 2015 GIS DATA. NORTHPOINT CONSULTING GROUP, INC. HAS NOT VERIFIED THIS PROPERTY BOUNDARY. BOUNDARY OBTAINED FROM PARCEL MERGER PLN-2018-010363.
3. THERE ARE NO NEARBY SCHOOLS, SCHOOL BUS STOPS, PLACES OF WORSHIP, PUBLIC PARKS OR TRIBAL RESOURCES WITHIN 600 FEET OF THE PROPOSED CULTIVATION AREA.
4. THERE ARE NO RESIDENCES ON ADJOINING PARCELS WITHIN 300 FEET OF THE PROPOSED CULTIVATION AREAS.
5. ANY EXISTING DEVELOPMENT CONSTRUCTED WITHOUT THE BENEFIT OF COUNTY REVIEW WILL BE SUBJECT TO THE HUMBOLDT COUNTY BUILDING DEPARTMENT UPON APPROVAL OF THE CONDITIONAL USE PERMIT.

LEGEND

- LEGAL PARCEL BOUNDARY
- ADJACENT LOT LINE
- INTERNAL ASSESSORS PARCEL BOUNDARIES
- CLASS I, II, III WATERCOURSE BUFFER
- ROADS

DIRECTIONS TO SITE:

FROM EUREKA, CA

- HEAD SOUTH ON US-101 S (APPROX. 19.9 MILES)
- TAKE EXIT 685 FOR CA-36 E (APPROX. 0.3 MILES)
- TURN LEFT ONTO CA-36 E (APPROX. 23.9 MILES)
- TURN RIGHT ONTO ALDERPOINT RD. (APPROX. 16.4 MILES)
- DESTINATION ON THE RIGHT

HUMSUN 3, LLC CONDITIONAL USE PERMIT

PRIMARY APN: 217-253-001

PROJECT INFORMATION:

APPLICANT:

HUMSUN 3, LLC
30855 ALDERPOINT RD.
BLOCKSBURG, CA 95514

PROPERTY OWNER:

HUMSUN RANCH, LLC
181 SANCHEZ ST.
SAN FRANCISCO, CA 94114

APPLICANTS AGENT:

NORTHPOINT CONSULTING GROUP, INC.
1117 SAMOA BLVD.
ARCATA, CA 95521
(707) 798-6438

SITE ADDRESS:

APN: 217-253-001
30855 ALDERPOINT RD.
BLOCKSBURG, CA 95514

TREES TO BE REMOVED = NONE

PRIME AGRICULTURAL AREA = 58.4 ACRES
20% OF PRIME AGRICULTURAL AREA = 11.68 ACRES

PROPOSED MIXED LIGHT CULTIVATION AREA = 134,850 SQ. FT.

WATER = PRIVATE
SEWER = PRIVATE

PRIMARY ASSESSOR PARCEL SIZE = ±264 ACRES
LEGAL DEED = ±1,887 ACRES

PARCEL #7 PER HUMBOLDT COUNTY PLANNING DEPARTMENT
NOM 18-022 DS 17.011

ZONING = AE-B-5(160); TP2

GENERAL PLAN DESIGNATION = AG, RA20

BUILDING SETBACKS:

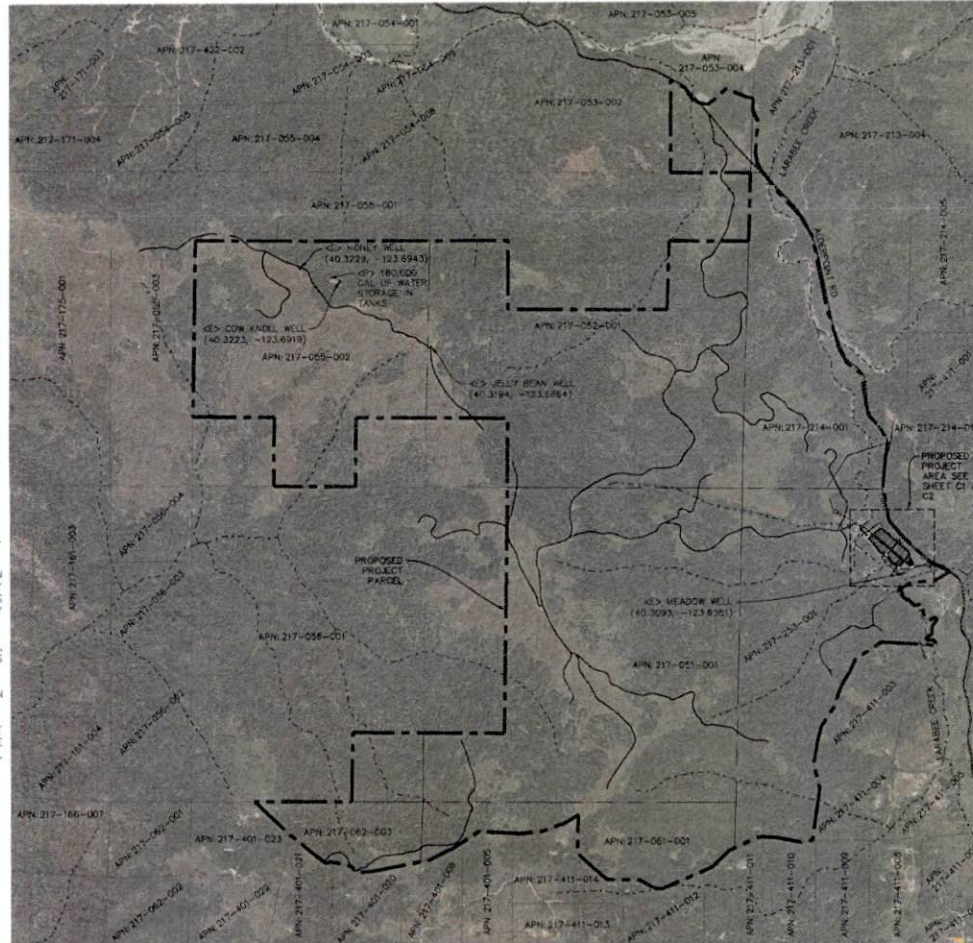
	SRA
FRONT	30'
SIDE	30'
REAR	30'

SRA AREA: = YES
IN COASTAL ZONE: = NO
IN 100 YR FLOOD ZONE: = YES



SHEET INDEX:

- C0 - PLOT PLAN, VICINITY MAP, & PROJECT NOTES
- C1 - CONSTRAINTS MAP
- C2 - PROPOSED SITE PLAN
- C3 - STREAM BUFFER TYPICAL DETAIL



PLOT PLAN

22x34 SHEET: 1"=1,000'
11x17 SHEET: 1"=2,000'

0 500 1,000 2,000



NORTHPOINT
CONSULTING GROUP, INC.
1117 Samoa Blvd., Arcata, CA 95521

HUMSUN 3, LLC - CUP
APN: 217-253-001

PLOT PLAN, VICINITY MAP, & PROJECT NOTES

DATE: 08/23/2024
BY: J.S. SCHOEN
SHEET
C0
(24-001)

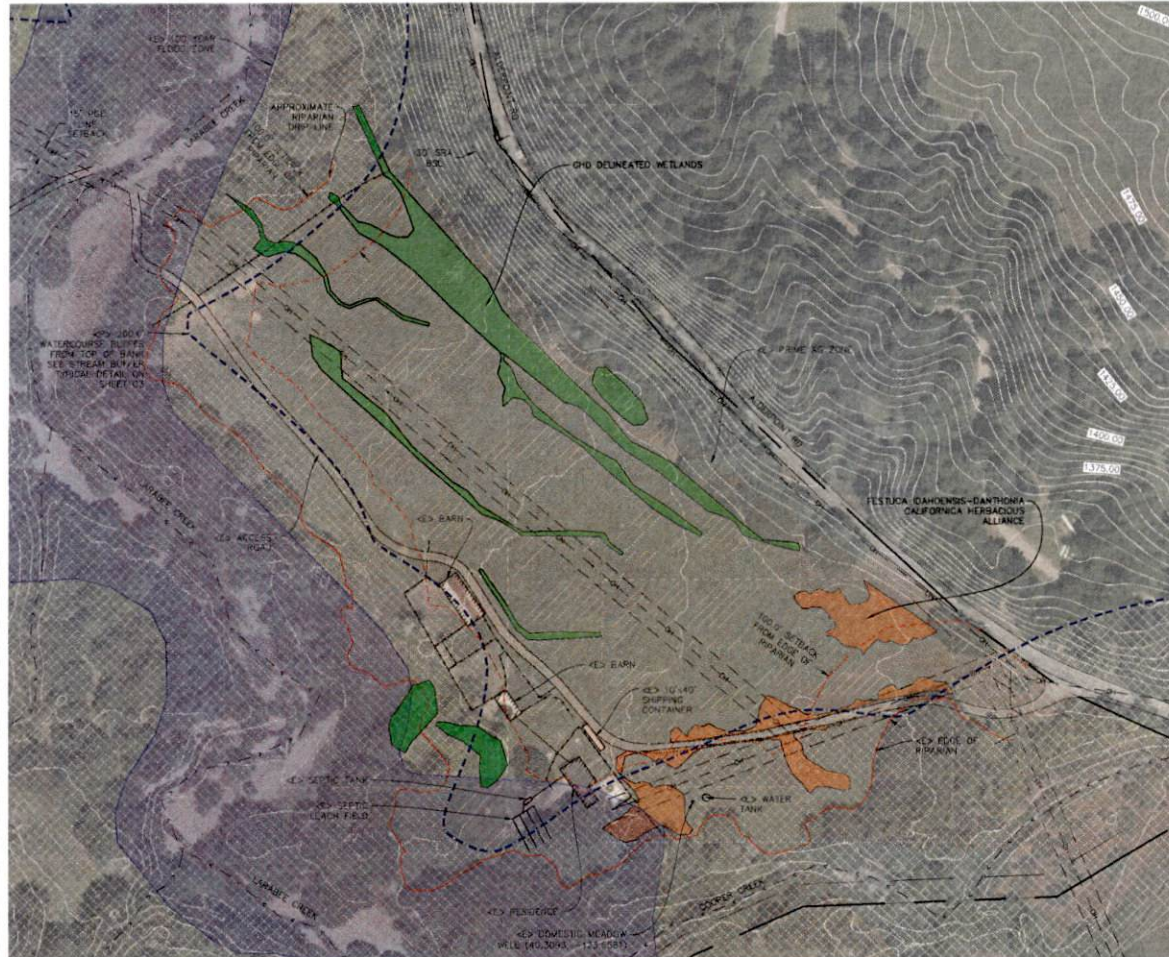
HUMSUN 3, LLC

EXISTING SITE PLAN - PROPOSED PROJECT AREA

APN: 217-253-001

APPROVED

FEB -6 2025
Humboldt County
PLANNING



- LEGEND**
- PARCEL BOUNDARY
 - LOT LINE
 - BUILDING SETBACK
 - WATERCOURSE BUFFER
 - STREAM
 - PGE 15' SETBACK
 - PGE OVERHEAD LINES
 - FENCE
 - EDGE OF RIPARIAN
 - 100' SETBACK FROM EDGE OF RIPARIAN
 - 200' SETBACK FROM WATERCOURSE
 - CHD DELINEATED WETLAND
 - DANTHONIA GRASSES
 - 100 YEAR FLOOD ZONE
 - PRIME AG

22x34 SHEET: 1"=80'
11x17 SHEET: 1"=160'



NORTHPOINT
CONSULTING GROUP, INC.
1117 Samoa Blvd., Arcata, CA 95521

HUMSUN 3, LLC - CUP
APN: 217-253-001
EXISTING SITE PLAN - PROPOSED PROJECT AREA

SHEET
C1
24-001



HUMSUN 3, LLC

PROPOSED SITE PLAN - PROPOSED PROJECT AREA

APN: 217-253-001

IMPACTS TABLE:

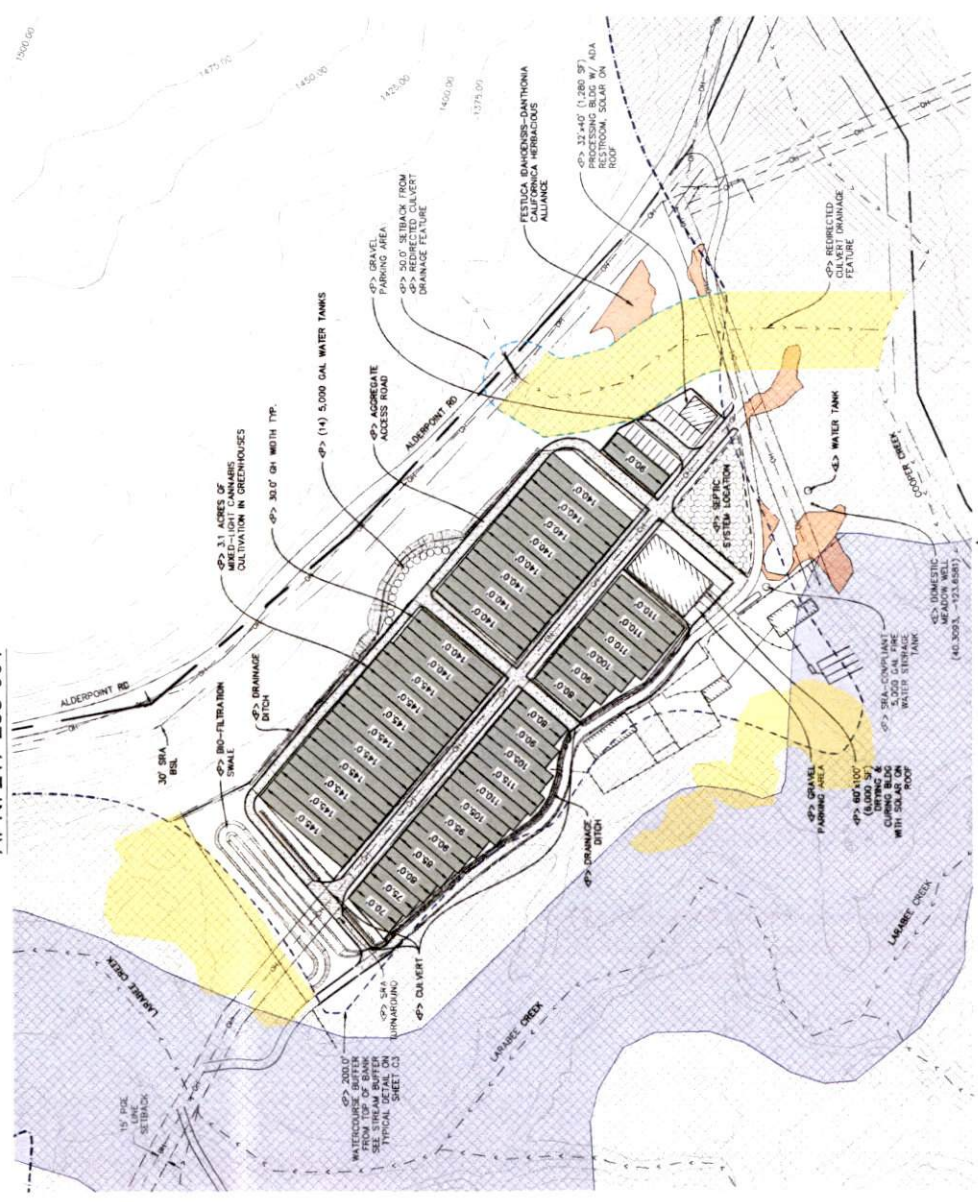
IMPACTS TO WETLANDS: 0.8 ACRES
IMPACTS TO DANTHONIA: 0.2 ACRES

GREENHOUSES TABLE:

(1) 30.0' X 70.0' GH	2,100	50 FT.
(2) 30.0' X 75.0' GH	2,250	50 FT.
(3) 30.0' X 80.0' GH	2,400	50 FT.
(4) 30.0' X 85.0' GH	2,550	50 FT.
(5) 30.0' X 90.0' GH	2,700	50 FT.
(6) 30.0' X 95.0' GH	2,850	50 FT.
(7) 30.0' X 100.0' GH	3,000	50 FT.
(8) 30.0' X 105.0' GH	3,150	50 FT.
(9) 30.0' X 110.0' GH	3,300	50 FT.
(10) 30.0' X 115.0' GH	3,450	50 FT.
(11) 30.0' X 120.0' GH	3,600	50 FT.
(12) 30.0' X 125.0' GH	3,750	50 FT.
(13) 30.0' X 130.0' GH	3,900	50 FT.
(14) 30.0' X 135.0' GH	4,050	50 FT.
(15) 30.0' X 140.0' GH	4,200	50 FT.
(16) 30.0' X 145.0' GH	4,350	50 FT.
TOTAL	134,850	50 FT.
	3.1	ACRES

LEGEND

- PARCEL BOUNDARY
- LOT LINE
- BUILDING SETBACK
- WATERCOURSE BUFFER
- STREAM
- PCE 15' SETBACK
- PCE OVERHEAD LINES
- FENCE
- 200' SETBACK FROM WATERCOURSE
- DANTHONIA GRASSES
- 100' YEAR FLOOD ZONE
- POTENTIAL CULTIVATION AREA
- <2> 2.63 ACRES OF WETLAND AND RIPARIAN CREATION AND ENHANCEMENT REFER TO WETLAND MITIGATION REPORT (J. REGAN CONSULTING, 2024)



22x34 SHEET 1"=80'
11x17 SHEET 1"=160'
0 40 80 160



NORTHPOINT
CONSULTING GROUP, INC.
1117 Samoa Blvd., Arcata, CA 95521

PROPOSED SITE PLAN - PROPOSED PROJECT AREA
APN: 217-253-001
HUMSUN 3, LLC - CUP

DATE: 02/08/25
DRAWN: J. REGAN
CHECKED: J. REGAN
SHEET: C2
24-001

