



**COUNTY OF HUMBOLDT**  
**PLANNING AND BUILDING DEPARTMENT**  
**CURRENT PLANNING DIVISION**

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

Hearing Date: October 18, 2018

To: Humboldt County Planning Commission

From: John H. Ford, Director of Planning and Building Department

Subject: **Pure Nature, LLC, Conditional Use Permit**  
Application Number: 11075  
Case Number: CUP16-142  
Assessor's Parcel Number (APN): 223-132-001  
444 Drew Drive, Garberville area

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Please contact Meghan Ryan, Senior Planner, at 707-445-7541 or by email at [vendorlaco3@co.humboldt.ca.us](mailto:vendorlaco3@co.humboldt.ca.us) if you have any questions about the scheduled public hearing item.

**AGENDA ITEM TRANSMITTAL**

<b>Hearing Date</b> October 18, 2018	<b>Subject</b> Conditional Use Permit	<b>Contact</b> Meghan Ryan
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**Project Description:** A Conditional Use Permit for an existing 13,884-square-foot commercial cannabis cultivation operation with 6,300 square feet of outdoor production and 7,584 square feet of mixed-light production. Cultivation activities extend from February to November. The applicant estimates 88,640 gallons of water is required annually for irrigation uses. Water for irrigation is provided by a rainwater catchment system that collects runoff from roof structures and road side drainage. Water for domestic uses is sourced from an on-site spring. There is 12,750 gallons of existing water storage. The applicant is proposing to install 50,000 gallons of additional water tanks to hold rainwater collected from roof tops and roadside drainages. Processing, including drying, curing and trimming of cannabis will occur on-site in a proposed 800-square-foot processing facility. The power source is two small generators. The applicant is in the processing of bringing conventional grid power from P. G. & E. to the subject parcel.

**Project Location:** The project is located in Humboldt County, in the Garberville area, on both sides of Drew Drive, approximately 0.3 mile north of the intersection of Sawmill Road and Drew Drive, on the property known as 444 Drew Drive.

**Present Plan Land Use Designations:** Agricultural Grazing (AG) and Residential Agriculture (RA40); 2017 General Plan; Density: 40 acres per dwelling unit; Slope stability: High Instability (3).

**Present Zoning:** Unclassified (U)

**Application Number:** 11075

**Case Number:** CUP16-142

**Assessor's Parcel Number:** 223-132-001

**Applicant**

Pure Nature LLC  
Attn.: Nathan Chevalier  
1271 Evergreen Road, #516  
Redway, CA 95560

**Owner**

April Newlander & Nathan Chevalier  
1271 Evergreen Road, #516  
Redway, CA 95560

**Agent**

Same as Applicant.

**Environmental Review:** The project is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) per Class 1, 15301 (Existing Facilities), Class 3, 15303 (New Construction or Conversion of Small Structures), and Class 4, 15304 (Minor Alterations to Land).

**State Appeal Status:** Project is NOT appealable to the California Coastal Commission.

**Major Issues:** None.

**PURE NATURE, LLC**  
Case Number: CUP16-142  
Assessor's Parcel Number: 223-132-001

**Recommended Commission Action:**

1. Describe the application as part of the Consent Agenda.
2. Survey the audience for any person who would like to discuss the application.
3. If no one requests discussion, make the following motion to approve the application as a part of the consent agenda:

*Find the project exempt from environmental review pursuant to Sections 15301, 15303, and 15304 of the State CEQA Guidelines, make all of the required findings for approval of the Conditional Use Permit based on evidence in the staff report and any public testimony, and adopt the Resolution approving the proposed Pure Nature LLC project subject to the recommended conditions.*

**Executive Summary:** Pure Nature, LLC, is applying for a Conditional Use Permit for an existing 13,884-square-foot medical cannabis cultivation operation consisting of 6,300 square feet of outdoor cultivation and 7,584 square feet of mixed-light cultivation. The applicant is proposing a 1,300-square-foot (sf) greenhouse to grow nursery plant stock to support on-site operations only. The subject parcel is currently developed with existing structures and four graded flats. The graded flats contain the following existing or proposed development as follows:

Flat	Existing	Proposed
A	1,387 sf single family residence 1,600 sf mixed light greenhouse 2 ag exempt structures	1,300 sf nursery (Option A)
B	6,300 outdoor cultivation area	3,100 sf full sun outdoor cultivation area 3,200 sf outdoor greenhouse
C	1,600 sf mixed light greenhouse	
D	1,600 sf mixed light greenhouse 2,000 sf mixed light greenhouse	
Area south of Flat D		Parking area 800 sf processing facility 1,300 sf nursery (Option B)

The applicant has four existing cultivation areas as described above. The mixed light cultivation will occur in four (4) greenhouses totaling 6,800 square feet. The greenhouses utilize a combination of artificial light and light deprivation to produce up to two (2) flowering cycles per year. The outdoor cultivation will occur outdoor totaling 3,100 square feet and in two (2) outdoor unlighted greenhouses totaling 3,200 square feet. The outdoor cultivation area is expected to produce one (1) flowering cycle per year. Cultivation activities will occur year round, with a 'Repair, Upgrade and Recondition Phase' occurring from December through January. According to the Attachment for Medical Marijuana Clearances/Permits submitted to the Department of Environmental Health, there will be an average of 3 employees on-site to support operational needs with a maximum of 10 employees during harvest and processing times.

Water for irrigation is provided by a rainwater catchment system that collects runoff from roof structures and road side drainage. Total water storage is 15,250 gallons [existing tanks: four 2,500-gallon tanks, one 750-gallon tank, two 1,000-gallon tanks] with an additional 2,500-gallon tank for fire protection purposes. The applicant is proposing to increase water storage by adding two 25,000-gallon water storage tanks for a total of 75,000 gallons of water storage once all hard-sided tanks are installed. Originally, the applicant estimated annual water use to be 88,640 gallons. Since the time of application, the applicant has employed water conservation strategies, such as in-ground planting within greenhouses and installation of drip irrigation to reduce the volume of water required for irrigation. In the Addendum to the Operations

Plan dated October 2, 2018, the applicant estimates water usage at 61,500 gallons. There will be sufficient water storage on-site to irrigate cannabis without relying on a surface water diversion. Water for domestic use will be supplied through an existing well, established by a riparian right (S025272), as well as a pending Small Domestic Use Registration (D032577) for a 60-day forbearance period. Water from the spring will be used exclusively for domestic purposes, including fire suppression storage and irrigation for a small garden which does not include cannabis. For domestic purposes, there are four existing 2,500-gallon tanks, with one 2,500-gallon tank proposed.

Pure Nature, LLC, will conduct all processing on-site at the proposed 800-square-foot processing facility. This facility will incorporate all aspects of processing including drying, curing, bucking down, and machine trimming. Soils on the site have been sampled, and a percolation test was conducted. Once the required approvals are in place, the metal building will be constructed on a cement slab, and all work will be conducted by licensed and bonded contractors in accordance with Humboldt County Building Codes. Pure Nature, LLC, will employ best management practices to ensure proper maintenance, not only of the structure but also of the site. The interior of the building will house the drying and curing chamber, trimming machines, commercial stainless-steel work tables, and employee bathroom. The work space will be well lit and ventilated. Power source is two small generators. The applicant is in the process of bringing conventional grid power (P. G. & E.) to the subject parcel at the end of October 2018. Once conventional power is installed, generators will remain on-site for emergency purposes only.

The subject parcel is accessed on Drew Drive. The access roads, include Sawmill Road, Upper Sawmill Road and Drew Drive, which are considered private roads and are connected by Alderpoint Road (County road). According to the Road Evaluation Report submitted by the applicant, these road segments are developed in their entirety to the equivalent of a road Category 4. The length of the road (Upper Sawmill Road and Drew Drive) segments are 0.6 mile from Alderpoint Road to Sawmill Road and 0.1 mile from Sawmill Road to the cultivation site (444 Drew Drive), which was inspected on February 27, 2018.

Security for the proposed project site will include a locked gate at the entrance to the parcel. A No Trespassing sign is proposed near the gate. Cultivation facilities will be completely enclosed by a 6-foot security fence that features a locked gate. Proposed lighting outside of the cultivation and processing facility consists of a minimum of four security lights that illuminate the entrances and parking areas. In addition, Pure Nature LLC is proposing to have security cameras at the entrance to the site, residence, and processing facility with data storage for up to 30 days. Motion sensors will be installed at all cultivation sites. The processing facility and the existing single-family residence, which is on-site housing and for security purposes, will have an alarm system. All potential employees will be subject to a criminal background check prior to employment. Each employee will be issued a company-issued ID badge and will be required to display the badge at all times while working at the subject property.

Environmental review for the proposed project was conducted, and based on the results of that analysis, staff believes the existing cultivation and processing aspects of the project are Categorically Exempt from the provisions of the California Environmental Quality Act (CEQA) because they can be considered to be an "Existing Facility" per Section 15301, the processing facility would be considered "New Construction or Conversion of a Small Structure" as defined by Section 15303, and grading associated with project improvements would be a "Minor Alteration to Land" as defined by Section 15304 because it would involve "minor public or private alterations in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees except for forestry or agricultural purposes."

Based on a review of Planning Division reference sources and comments from all involved referral agencies, planning staff believes that the applicant has submitted evidence in support of making all of the required findings for approving the conditional use permit.

**ALTERNATIVES:** The Planning Commission could elect not to approve the project, or to require the applicant to submit further evidence, or modify the project. If modifications may cause potentially significant impacts, additional CEQA analysis and findings may be required. These alternatives could be

implemented if the Commission is unable to make all of the required findings. Planning Division staff has stated that the required findings in support of the proposal have been made. Consequently, Planning staff does not recommend further consideration of either alternative.

The Commission could also decide the project may have environmental impacts that would require further environmental review pursuant to CEQA. Staff did not identify any potentially significant impacts. As Lead Agency, the Department has determined that the Project is Categorically Exempt under the three Exemption Classes stated above. However, the Commission may reach a different conclusion. In that case, the Commission should continue the item to a future date at least two months later to give staff the time to complete further environmental review.

**RESOLUTION OF THE PLANNING COMMISSION  
OF THE COUNTY OF HUMBOLDT  
Resolution Number 18-**

**Case Number: CUP16-142  
Assessor's Parcel Number: 223-132-001**

**Makes the required findings for certifying compliance with the California Environmental Quality Act and conditionally approves the Pure Nature, LLC, Conditional Use Permit request.**

**WHEREAS**, Pure Nature, LLC, submitted an application and evidence in support of approving a Conditional Use Permit for an existing 13,884-square-foot medical cannabis cultivation operation with 6,300 square feet of outdoor cultivation and 7,584 square feet of mixed light cultivation, including an ancillary nursery and a proposed 800-square-foot processing facility.

**WHEREAS**, the County Planning Division has reviewed the submitted application and evidence and has referred the application and evidence to involved reviewing agencies for site inspections, comments, and recommendations; and

**WHEREAS**, the project is exempt from environmental review per Class 1, 15301 (Existing Facilities), Class 3, 15303 (New Construction or Conversion of Small Structures), and Class 4, 15304 (Minor Alterations to Land); and

**WHEREAS**, Attachment 2 in the Planning Division staff report includes evidence in support of making all of the required findings for approving the proposed Conditional Use Permit (Case Number CUP16-142); and

**WHEREAS**, a public hearing was held on the matter before the Humboldt County Planning Commission on October 18, 2018.

**NOW, THEREFORE**, be it resolved, determined, and ordered by the Planning Commission that:

1. The project is categorically exempt from environmental review pursuant to Class 1, 15301 (Existing Facilities), Class 3, 15303 (New Construction or Conversion of Small Structures), and Class 4, 15304 (Minor Alterations to Land); and
2. The findings in Attachment 2 of the Planning Commission staff report support approval of Case Number CUP16-142 based on the submitted substantial evidence; and
3. Conditional Use Permit (CUP16-142) is approved as recommended and conditioned in Attachment 1 for Case Number CUP16-142.

Adopted after review and consideration of all the evidence on October 18, 2018.

The motion was made by Commissioner \_\_\_\_ and seconded by Commissioner \_\_\_\_.

AYES: Commissioners:

NOES: Commissioners:

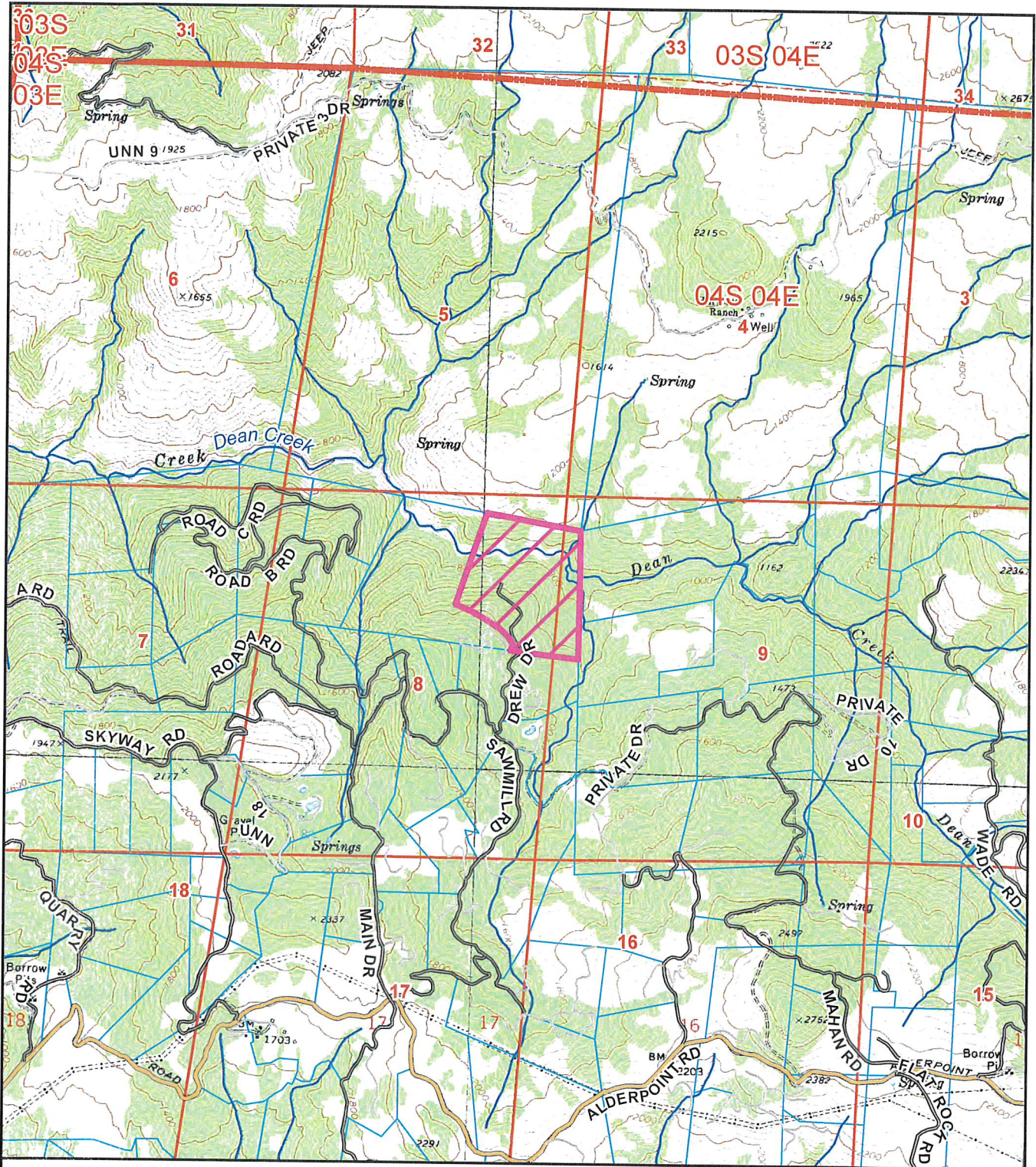
ABSTAIN: Commissioners:

ABSENT: Commissioners:

DECISION:

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

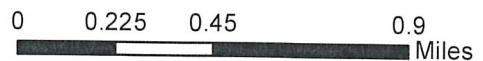


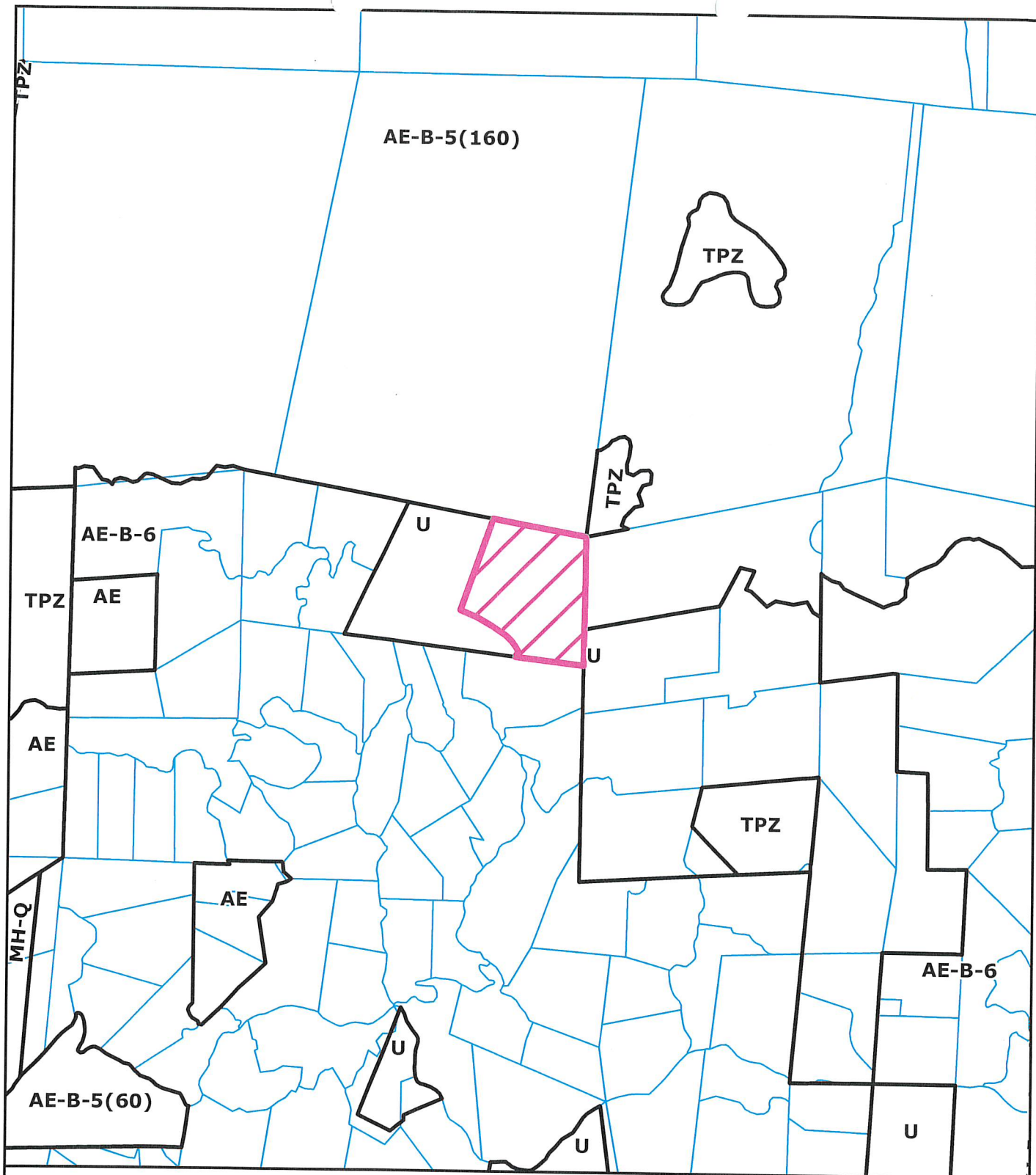
**TOPO MAP**  
**PROPOSED MOONTIME MEDICINALS MBC**  
**GARBERVILLE AREA**  
**CUP-16-142**  
**APN: 223-132-001**  
**T04S R04E S8; S9 HB&M (FORT SEWARD)**

Project Area =



This map is intended for display purposes and should not be used for precise measurement or navigation. Data has not been completely checked for accuracy.





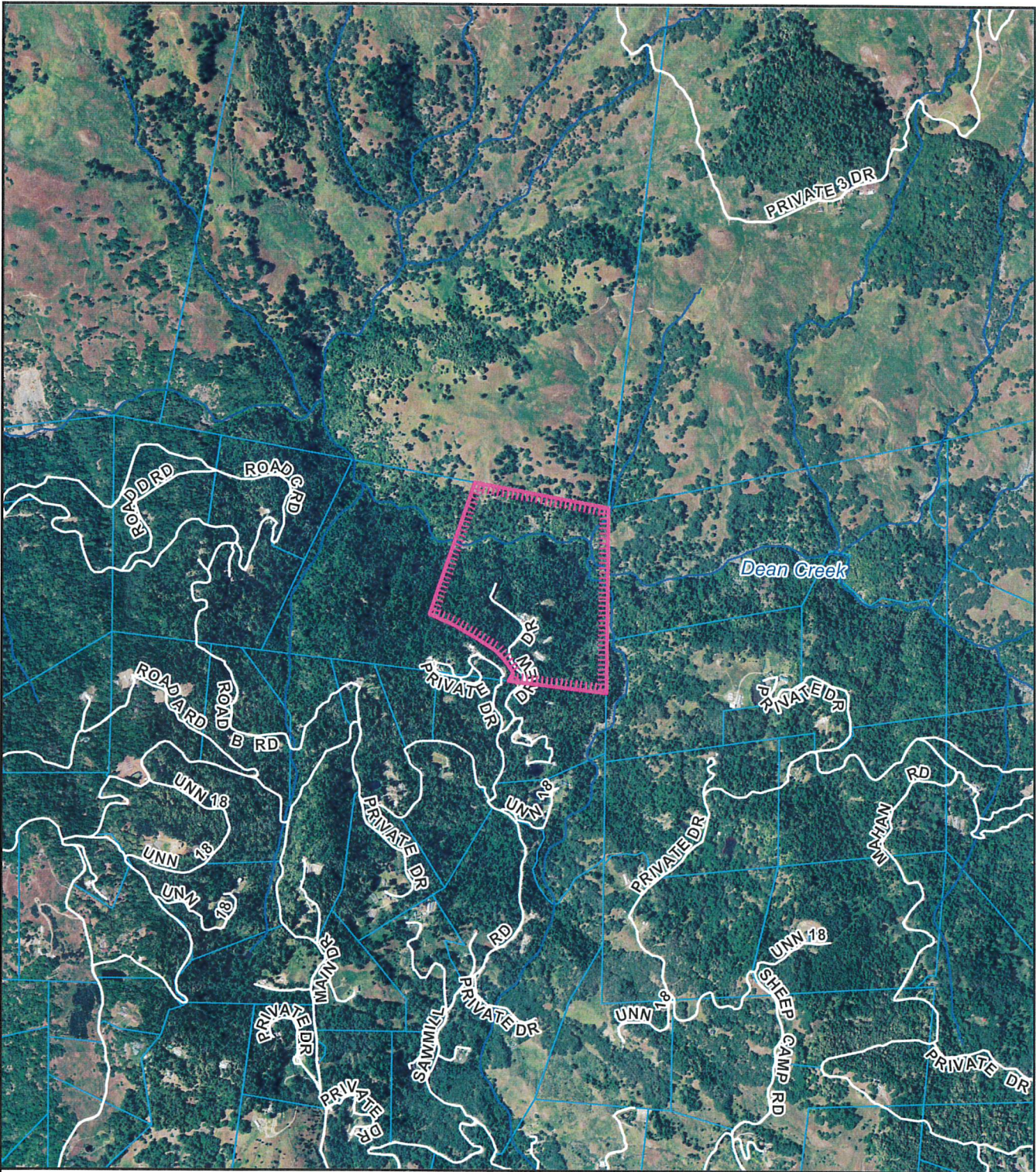
**ZONING MAP**  
**PROPOSED MOONTIME MEDICINALS MBC**  
**GARBERVILLE AREA**  
**CUP-16-142**  
**APN: 223-132-001**  
**T04S R04E S8; S9 HB&M (FORT SEWARD)**

Project Area = 

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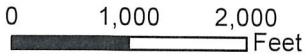


**AERIAL MAP**  
**PROPOSED MOONTIME MEDICINALS MBC**  
**GARBERVILLE AREA**  
**CUP-16-142**  
**APN: 223-132-001**  
**T04S R04E S8; S9 HB&M (FORT SEWARD)**

Project Area = 

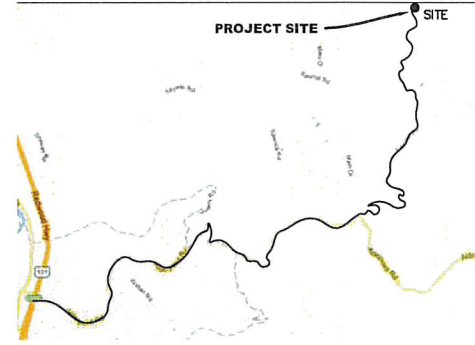


This map is intended for display purposes and should not be used for precise measurement or navigation. Data has not been completely checked for accuracy.



# PURE NATURE, LLC. CONDITIONAL USE PERMIT APPLICATION PLOT PLAN

APN: 223-132-001



**VICINITY MAP**  
NOT TO SCALE

**PROJECT DESCRIPTION:**

PURE NATURE, LLC. IS PROPOSING TO PERMIT EXISTING MEDICAL CANNABIS CULTIVATION ACTIVITIES IN ACCORDANCE WITH THE COUNTY OF HUMBOLDT'S (COUNTY) COMMERCIAL MEDICAL MARIJUANA LAND USE ORDINANCE (CMLUO), ORDINANCE NO. 2554. THE EXISTING OPERATION INCLUDES APPROXIMATELY 13,100 SQUARE FEET (SF) OF MEDICAL CANNABIS. THE PROJECT PROPOSAL INCLUDES THE DEVELOPMENT OF FACILITIES APPURTENANT TO THE CULTIVATION, INCLUDING GREENHOUSES, X FACILITIES FOR DRYING, CURING, GRADING AND TRIMMING OF MEDICAL CANNABIS, WATER DIVERSION WORKS AND APPROPRIATE WATER STORAGE.

- (2) AG EXEMPT OUTDOOR GREENHOUSE, (4) AG EXEMPT MIXED LIGHT GREENHOUSES, (1) OUTDOOR CULTIVATION AREA AND (1) <P> NURSERY:
- |                       |                |      |
|-----------------------|----------------|------|
| GH #1 (MIXED LIGHT) = | 1,600 SQ. FT.  | 1440 |
| GH #2 (MIXED LIGHT) = | 1,600 SQ. FT.  | 1440 |
| GH #3 (MIXED LIGHT) = | 1,600 SQ. FT.  | 2112 |
| GH #4 (MIXED LIGHT) = | 2,000 SQ. FT.  | 2592 |
| GH #5 (OUTDOOR) =     | 1,600 SQ. FT.  |      |
| GH #6 (OUTDOOR) =     | 1,600 SQ. FT.  |      |
| OUTDOOR CULT. AREA =  | 3,100 SQ. FT.* |      |
|                       | 13,100 SQ. FT. |      |

<P> NURSERY\* = 1,310 SQ. FT.  
(\* LESS THAN 10% OF TOTAL CULTIVATION AREA)

**GENERAL NOTES:**

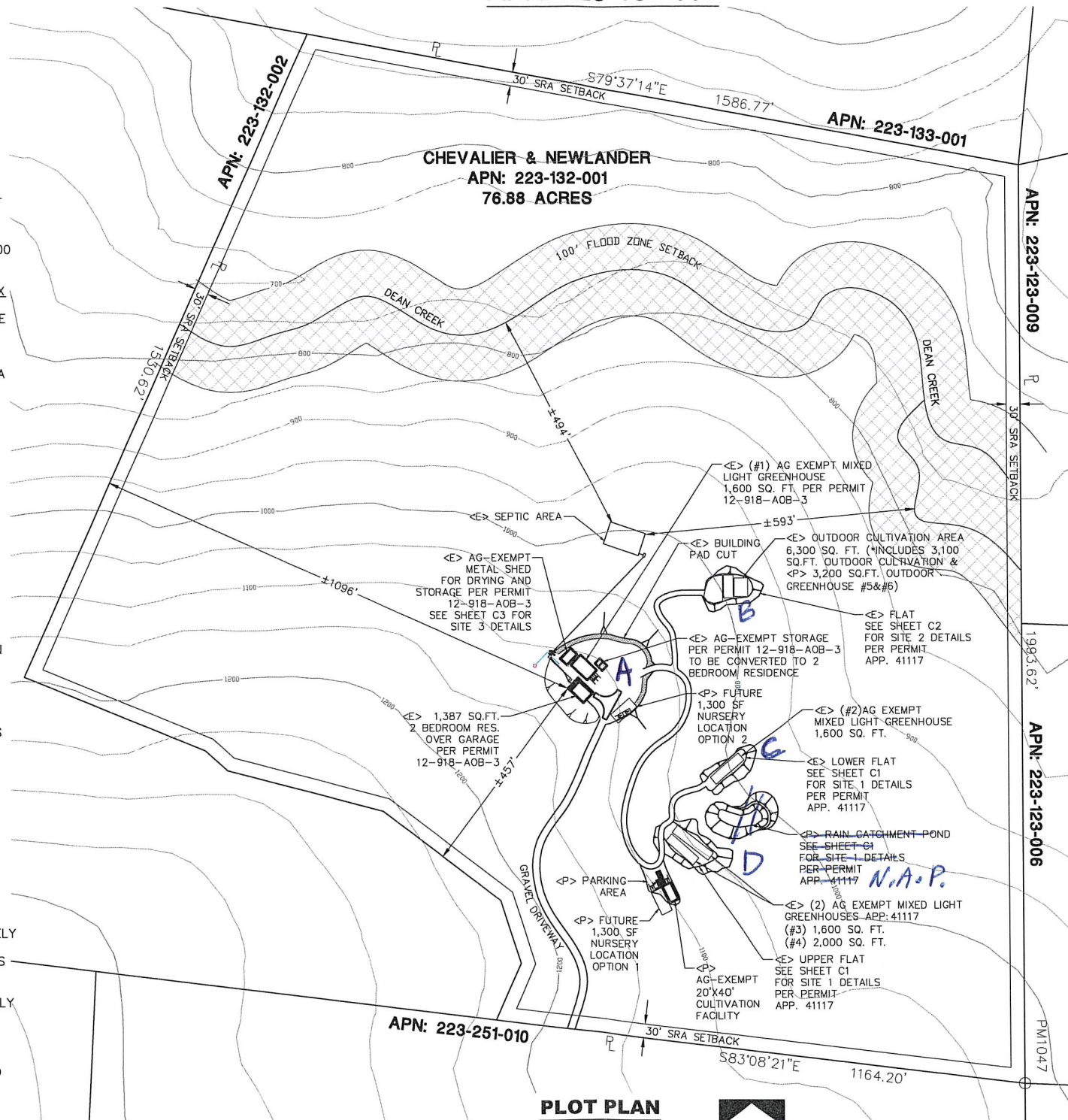
- DRAWING SCALE AS NOTED. WRITTEN DIMENSIONS SHALL TAKE PRECEDENCE OVER SCALED DIMENSIONS.
- THIS IS NOT A BOUNDARY SURVEY. BOUNDARY INFORMATION DEPICTED HAS BEEN OBTAINED FROM HUMBOLDT COUNTY 2015 GIS DATA. MANHARD CONSULTING LTD. HAS NOT VERIFIED THIS PROPERTY BOUNDARY.
- THERE ARE NO NEARBY SCHOOLS, SCHOOL BUS STOPS, PLACES OF WORSHIP, PUBLIC PARKS OR TRIBAL RESOURCES WITHIN 600 FEET OF THE PROPOSED MANUFACTURING FACILITY/DISTRIBUTION FACILITY/CULTIVATION AREA.
- THERE ARE NO RESIDENCES ON ADJOINING PARCELS WITHIN 300 FEET OF THE PROPOSED.

**IRRIGATION AND DOMESTIC WATER USE**

- WATER FOR DOMESTIC USE WILL BE SUPPLIED THROUGH AN EXISTING SPRING, ESTABLISHED BY A RIPARIAN RIGHT (S025272), AS WELL AS A PENDING SMALL DOMESTIC USE REGISTRATION (D032577) FOR A 60 DAY FORBEARANCE PERIOD. WATER FROM THE SPRING WILL BE USED EXCLUSIVELY FOR DOMESTIC PURPOSES, INCLUDING FIRE SUPPRESSION STORAGE AND IRRIGATION OF A SMALL GARDEN WHICH DOES NOT INCLUDE CANNABIS.
- WATER FOR IRRIGATION OF CANNABIS WILL BE DONE ENTIRELY WITH RAIN WATER CATCHMENT. A PROPOSED OFF STREAM POND, PERMITTED THROUGH HUMBOLDT COUNTY BUILDING DEPARTMENT AND CALIFORNIA DEPARTMENT OF FISH & WILDLIFE, WILL COLLECT RUNOFF FROM ROOF STRUCTURES AND ROAD SIDE DRAINAGE, AND WILL DISTRIBUTE WATER TO CULTIVATION AREA.

**NCRWQCB NOTICE OF INTENT**

THE SUBJECT PARCEL HAS BEEN ENROLLED IN THE NCRWQCB CANNABIS CULTIVATION WASTE DISCHARGE REGULATORY PROGRAM. WDID NUMBER 1B16208CHUM



**PLOT PLAN**

22x34 SHEET: 1"=150'  
11x17 SHEET: 1"=300'  
0 75 150 300



**PROJECT INFORMATION:**

**ORIGINAL APPLICANT:**  
MOONTIME MEDICINALS, MBC.  
444 DREW DRIVE  
GARBERVILLE, CA 95589

**NOW:**  
PURE NATURE, LLC.  
444 DREW DRIVE  
GARBERVILLE, CA 95589

**PROPERTY/CORPORATE OWNERS:**  
NATHAN CHEVALIER & APRIL NEWLANDER  
444 DREW DRIVE  
GARBERVILLE, CA 95589

**OWNERS AGENT:**  
MANHARD CONSULTING  
611 "I" STREET, SUITE A  
EUREKA, CA 95501  
(707) 444-3800

**SITE ADDRESS:**  
APN: 223-132-001  
444 DREW DRIVE  
GARBERVILLE, CA 95589

TREES TO BE REMOVED = 0  
EXISTING CULTIVATION AREA = 13,100 SQ. FT.  
EARTHWORK QUANTITIES = <E> ±5025 CY  
= <P> ±450 CY  
WATER = PRIVATE  
SEWER = PRIVATE  
PARCEL SIZE = ±76.88 ACRES  
ZONING: = UNCLASSIFIED  
AL40; AG (FRWK)

**BUILDING SETBACKS:**

	AE	SRA
FRONT	30'	30'
SIDE	20'	30'
REAR	10'	30'

MAX BLDG. HT. = NONE SPECIFIED  
SRA AREA: = YES  
IN COASTAL ZONE: = NO  
IN 100 YR FLOOD ZONE: = YES

BLDG FT²	USE TYPE	SPACE/USE SQFT	EMPLOYEES	SPACE/EMPLOYEE	PARKING REQUIRED
100	OFFICE	1/300 FT²	1	1:1	1
500	MANUFACTURING	1/1500 FT²	1	1:1	1
144	WAREHOUSE	1/2500 FT²	2	1:4	0

**PARKING SUMMARY**

PARKING REQUIRED 2 SPACES  
PARKING PROVIDED 2 SPACES  
ACCESSIBLE PARKING PROVIDED 1 SPACES

**SHEET INDEX:**

- C0 - PLOT PLAN, VICINITY MAP, & PROJECT NOTES
- C1 - SITE 1 DETAILS
- C2 - SITE 2 DETAILS
- C3 - SITE 3 DETAILS
- C4 - CULTIVATION FACILITY FLOOR PLAN
- C5 - GREENHOUSE FLOOR PLANS
- C6 - EROSION CONTROL NOTES

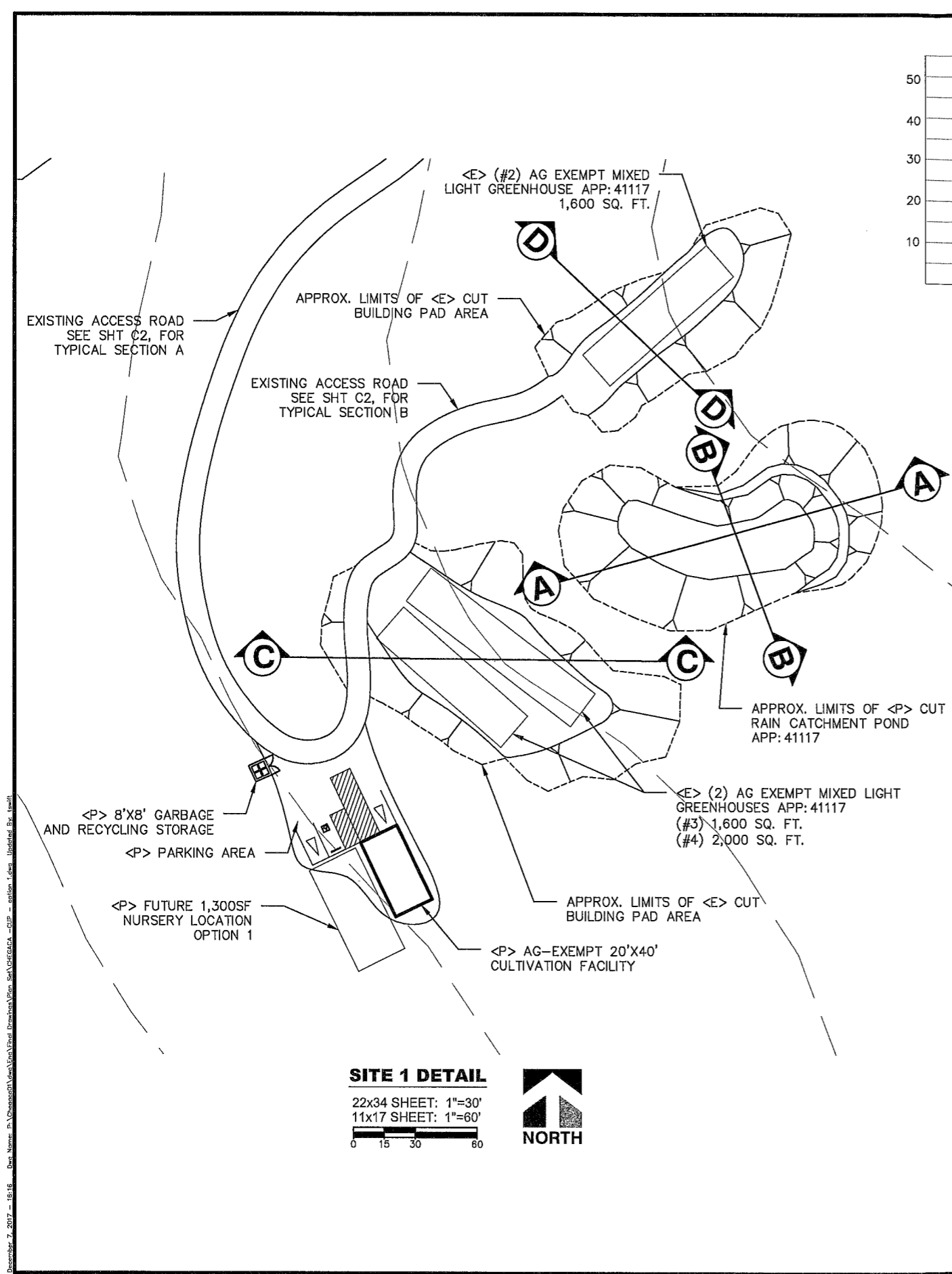
NO.	DATE	REVISIONS

**Manhard CONSULTING**  
611 "I" STREET, SUITE A, EUREKA, CA 95501  
(707) 444-3800  
www.manhard.com  
Civil Engineering • Environmental Science • Landscape Architecture • Planning

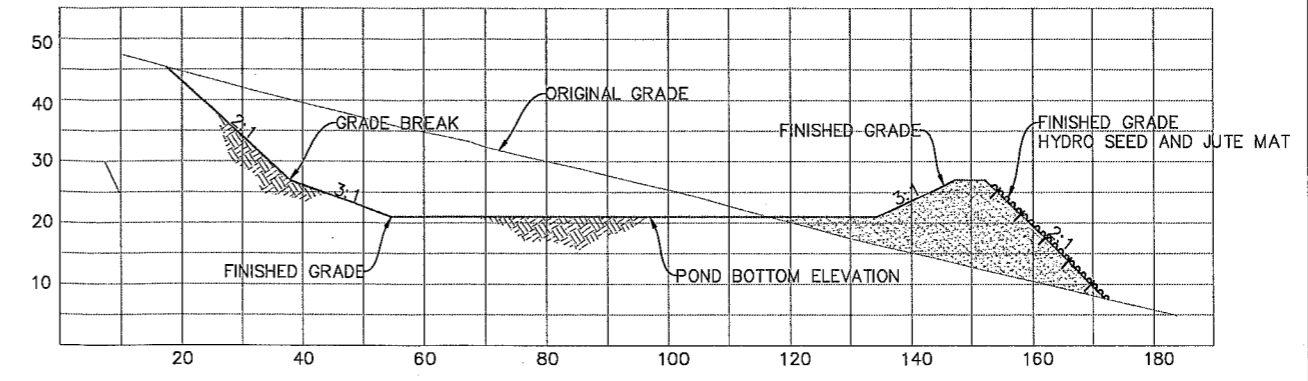
PURE NATURE, LLC.  
444 DREW DRIVE, GARBERVILLE, CA 95589 APN: 223-132-001  
PLOT PLAN, VICINITY MAP, & PROJECT NOTES

PROJ. NO.: POW  
PROJ. ASSOC.: TW  
DRAWN BY: TJS  
DATE: 11-30-17  
SCALE: AS NOTED  
SHEET  
**C0**  
CHEGACA01  
©2008 ALL RIGHTS RESERVED

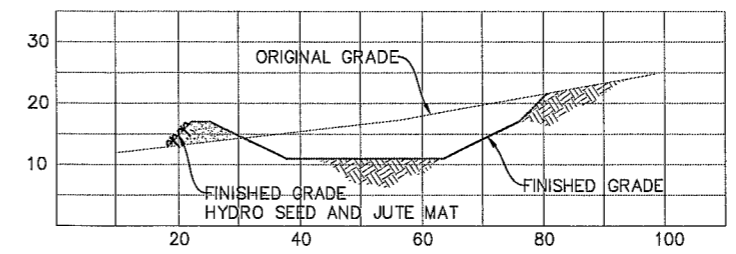
OPTION 1



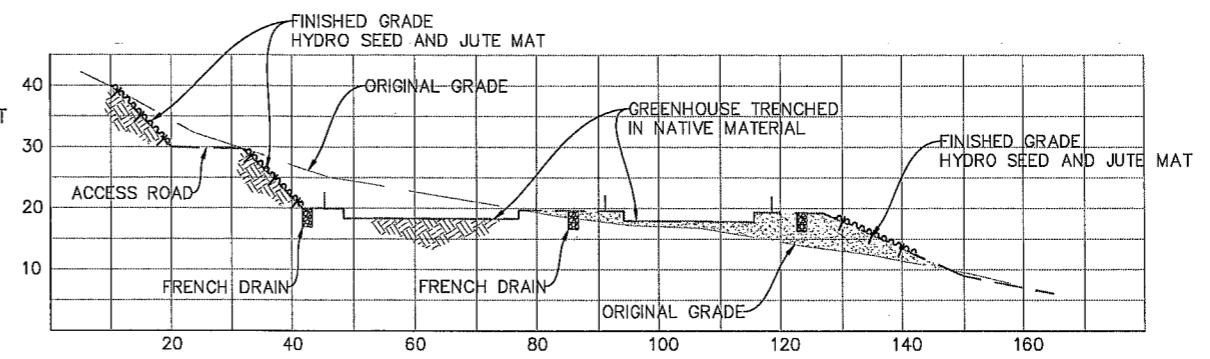
**SITE 1 DETAIL**  
 22x34 SHEET: 1"=30'  
 11x17 SHEET: 1"=60'  
  
 NORTH



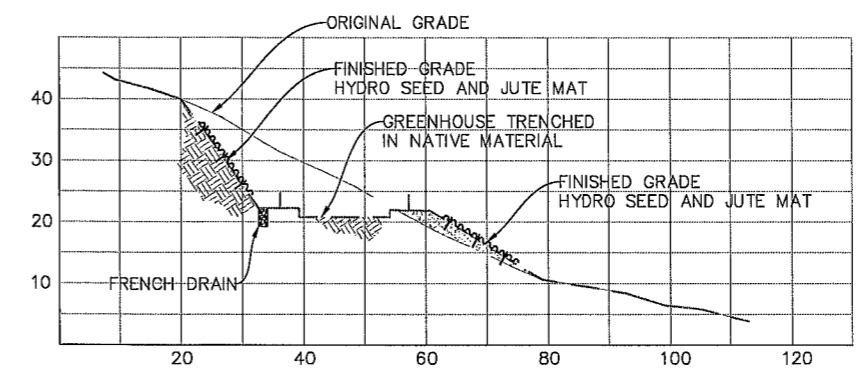
**RAIN CATCHMENT POND - SECTION A**  
 SCALE AS SHOWN



**RAIN CATCHMENT POND - SECTION B**  
 SCALE AS SHOWN



**UPPER FLAT - SECTION C**  
 SCALE AS SHOWN



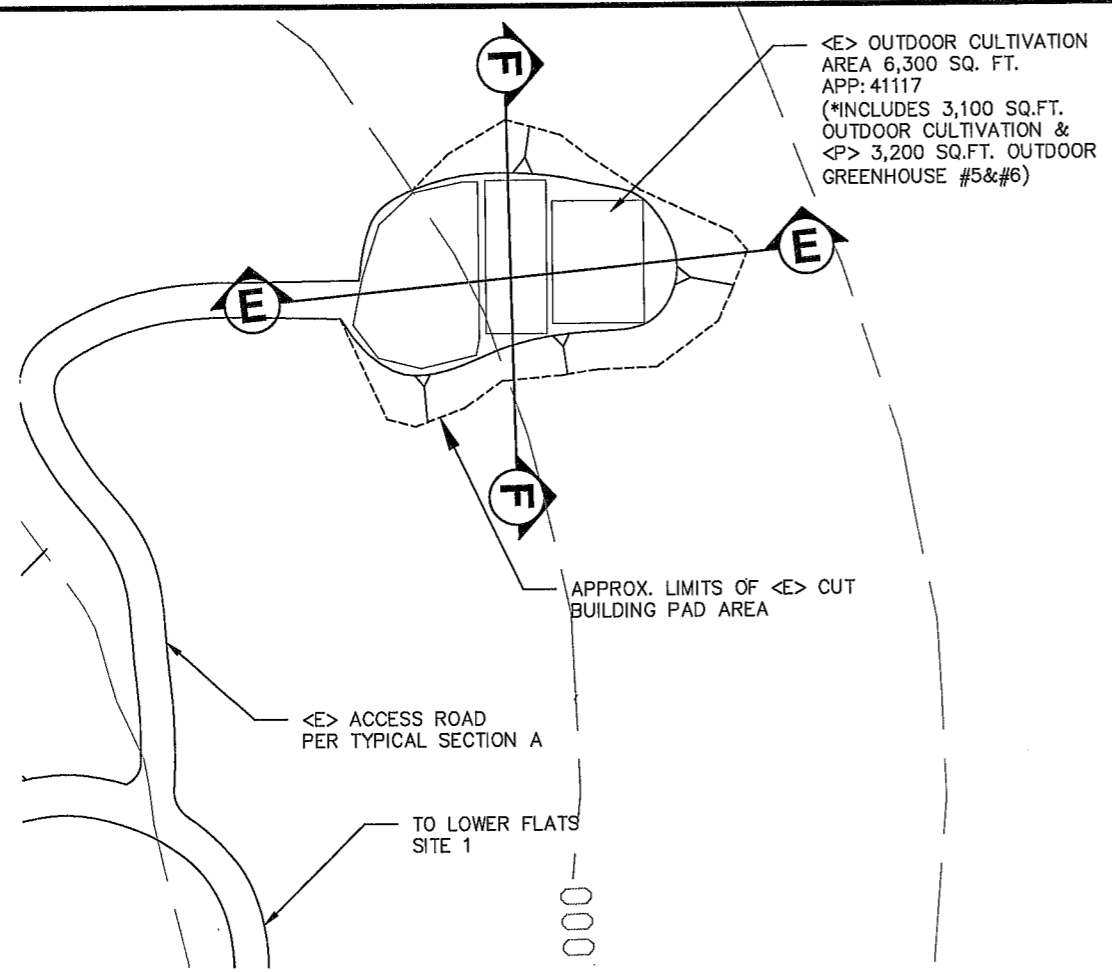
**LOWER FLAT - SECTION D**  
 SCALE AS SHOWN

NO.	DATE

**Manhard CONSULTING**  
 811 Street, Suite A, Eureka, CA 94501  
 Construction Management - Environmental Science - Landscape Architecture - Planning

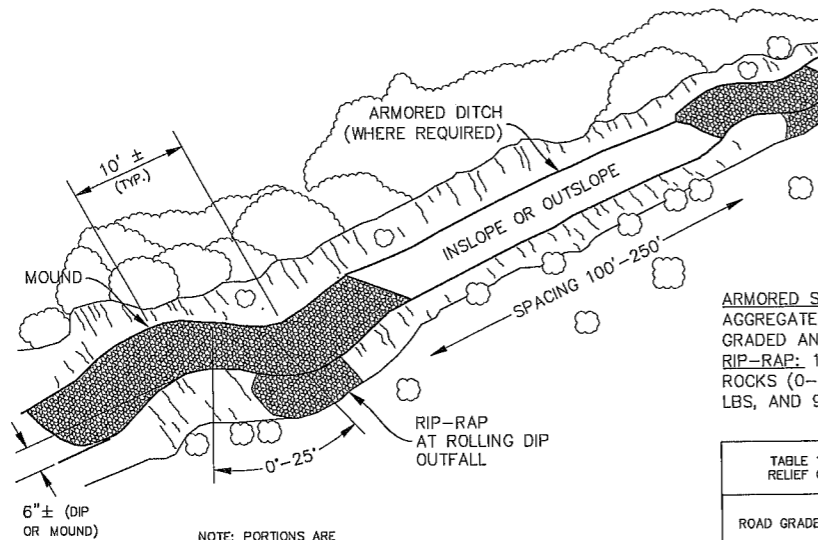
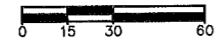
PURE NATURE, LLC.  
 444 DREW DRIVE, GARBERVILLE, CA 95589 APN: 223-132-001  
 SITE 1 DETAILS, APP # 41117

PROJ. MGR.: PCW  
 PROJ. ASSOC.: TW  
 DRAWN BY: STP  
 DATE: 11-30-17  
 SCALE: AS NOTED  
 SHEET  
**C1**  
 CHEGACA01



**SITE 2 DETAIL**

22x34 SHEET: 1"=30'  
11x17 SHEET: 1"=60'

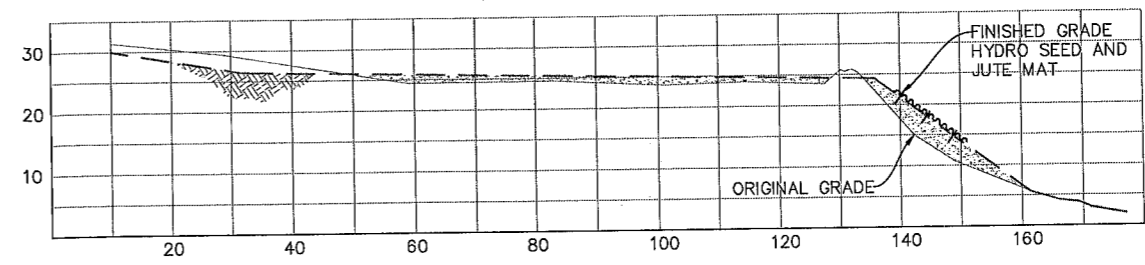


**TYPICAL ROLLING DIP DETAIL**  
NOT TO SCALE

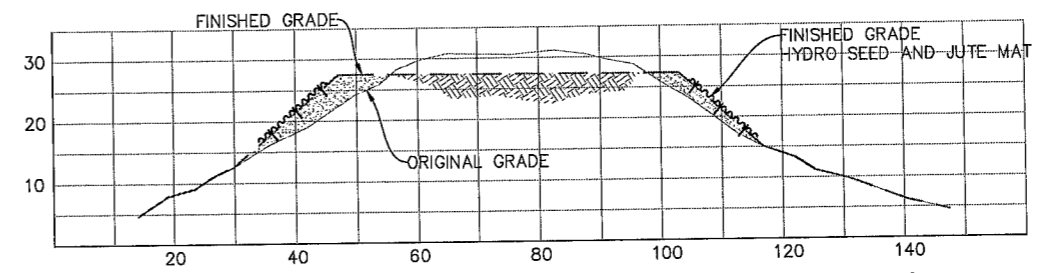
NOTE: PORTIONS ARE EXAGGERATED FOR CLARITY

ARMORED SURFACE: 12" OF CLASS 2 AGGREGATE BASE (3" MINUS, WELL GRADED AND LESS THAN 5% CLAYS) RIP-RAP: 12" OF TYPE NO. 1 BACKING ROCKS (0-5% 200 LBS, 50-100% 75 LBS, AND 90-100% 25 LBS)

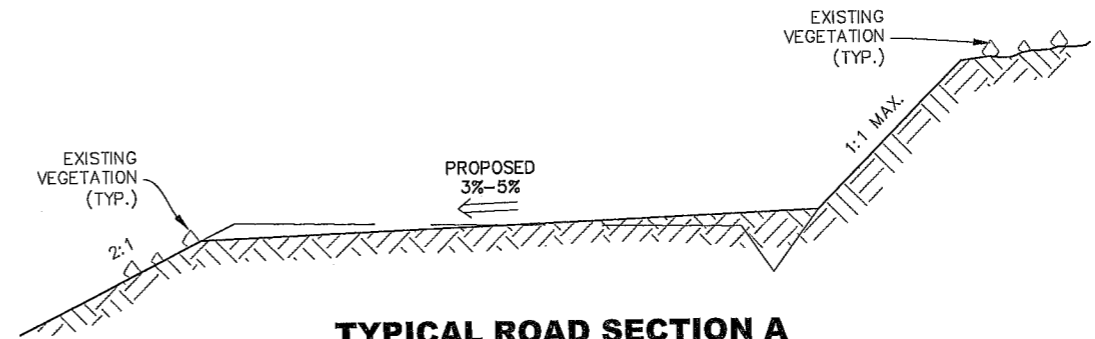
TABLE 1: ROLLING DIP AND DITCH RELIEF CULVERT RECOMMENDATIONS	
ROAD GRADE (%)	SOIL ERODIBILITY ERODITIVE SOILS (FT)
0-3	250
4-6	160
7-9	130
10-12	115
12+	100



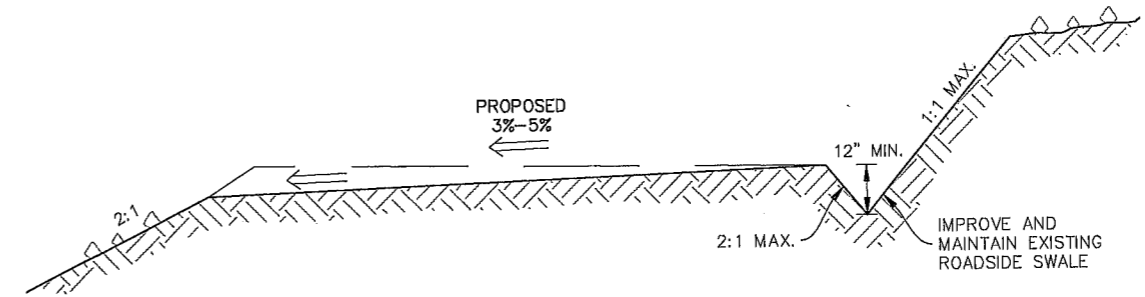
**EXISTING FLAT - SECTION E**  
SCALE AS SHOWN



**EXISTING FLAT - SECTION F**  
SCALE AS SHOWN



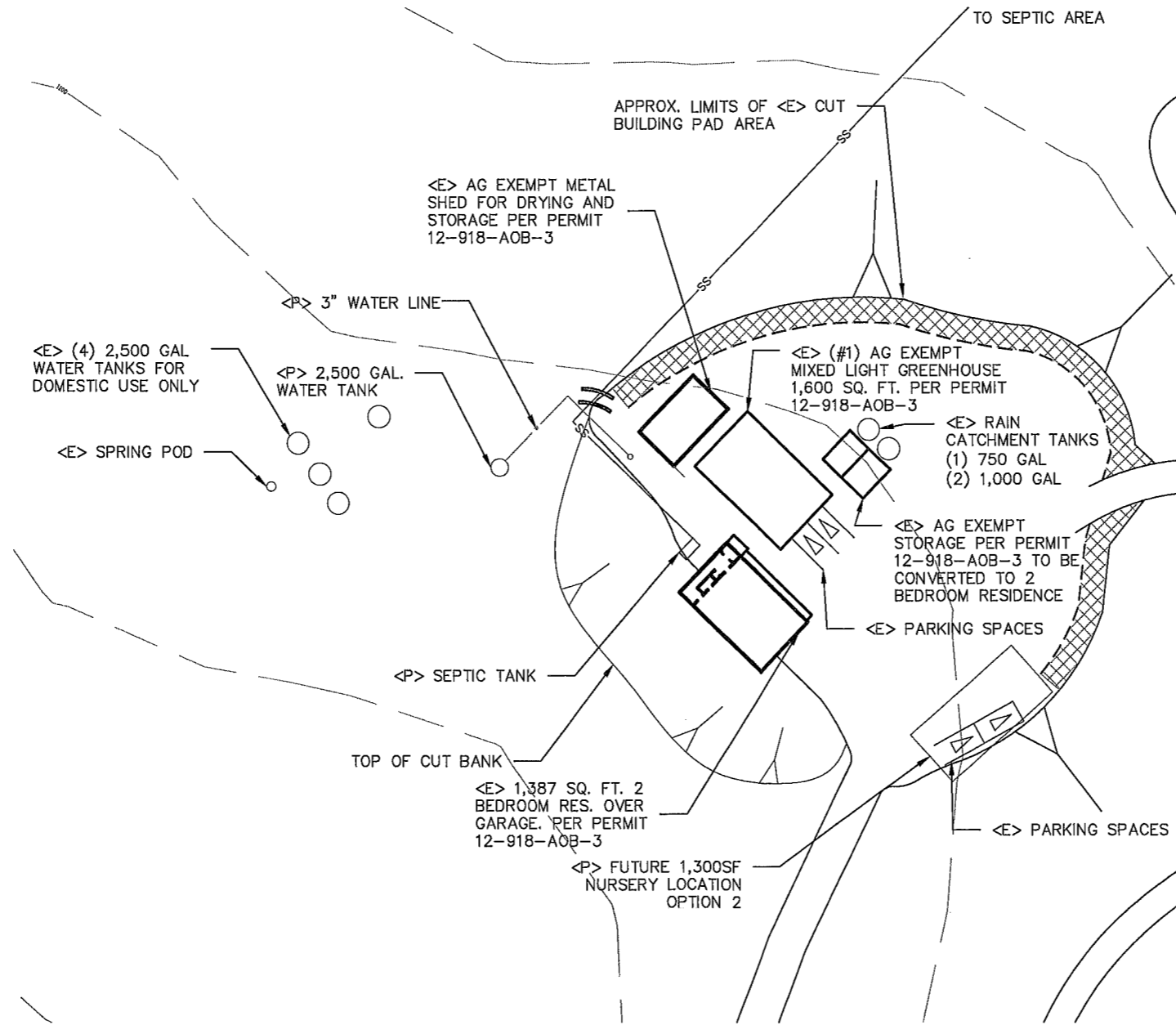
**TYPICAL ROAD SECTION A**  
NOT TO SCALE



**TYPICAL ROAD SECTION B**  
NOT TO SCALE


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 PURE NATURE, LLC.  
 444 DREW DRIVE, GARBERVILLE, CA 95689 APN: 223-132-001  
 SITE 2 DETAILS, APP # 41117  
 SHEET C2  
 CHEGACA01  
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December 7, 2017 - 10:15 AM File Name: P:\Chegaca01\Drawings\Final Drawings\CUP - Option 1.dwg User: jls

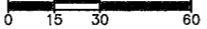


**SITE 3 DETAIL**

22x34 SHEET: 1"=30'  
 11x17 SHEET: 1"=60'



NORTH



NO.	REVISION	DATE

**Manhard CONSULTING**

1501 S. Bascom Ave., Suite 100, San Jose, CA 95128  
 408.944.7000  
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 Civil, Mechanical, Water & Wastewater  
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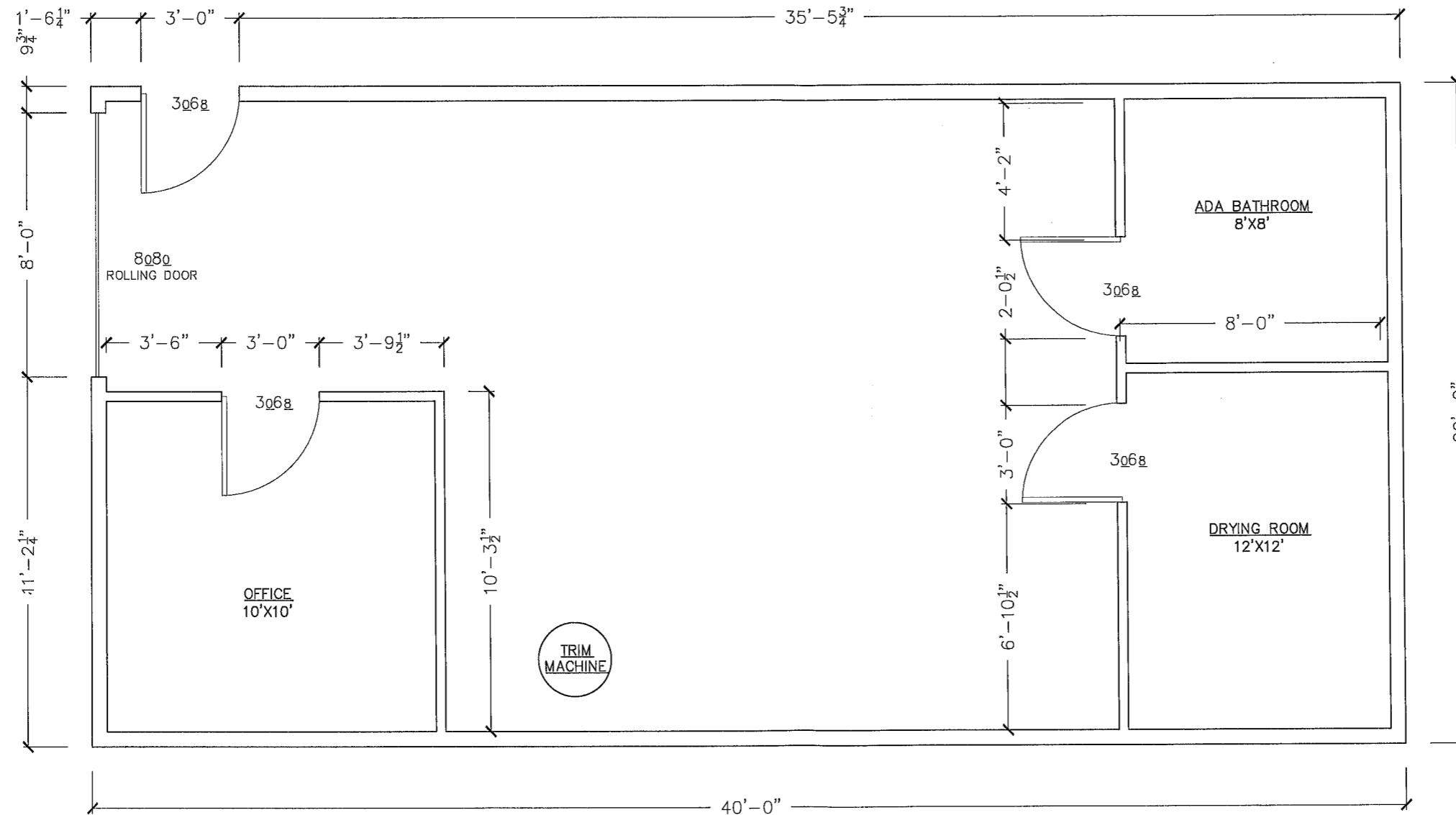
SITE 3 DETAILS

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PROJ. MGR.: FOW  
 PROJ. ASSOC.: IW  
 DRAWN BY: JLS  
 DATE: 11-30-17  
 SCALE: AS NOTED

SHEET  
**C3**  
 CHEGACA01  
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December 7, 2017 - 16:16 Doc Name: P:\csc\p01\16116\16116\16116\Final\_Drawing\Plan\_Sets\CHEGACA\_01P - option 1.dwg Updated By: twiff



### CULTIVATION FACILITY

22x34 SHEET: 1"=2'  
 11x17 SHEET: 1"=4'

NO.	DATE	DESCRIPTION	BY

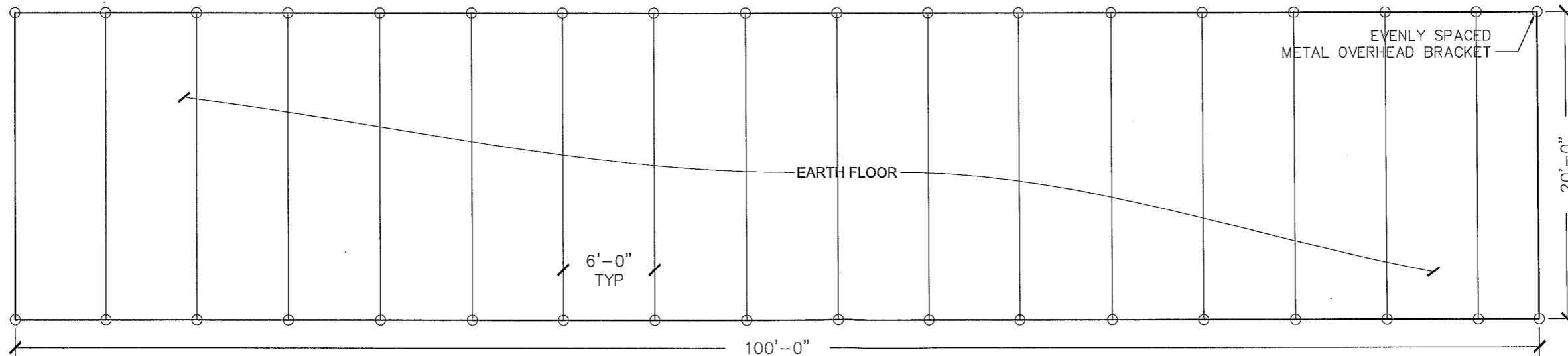
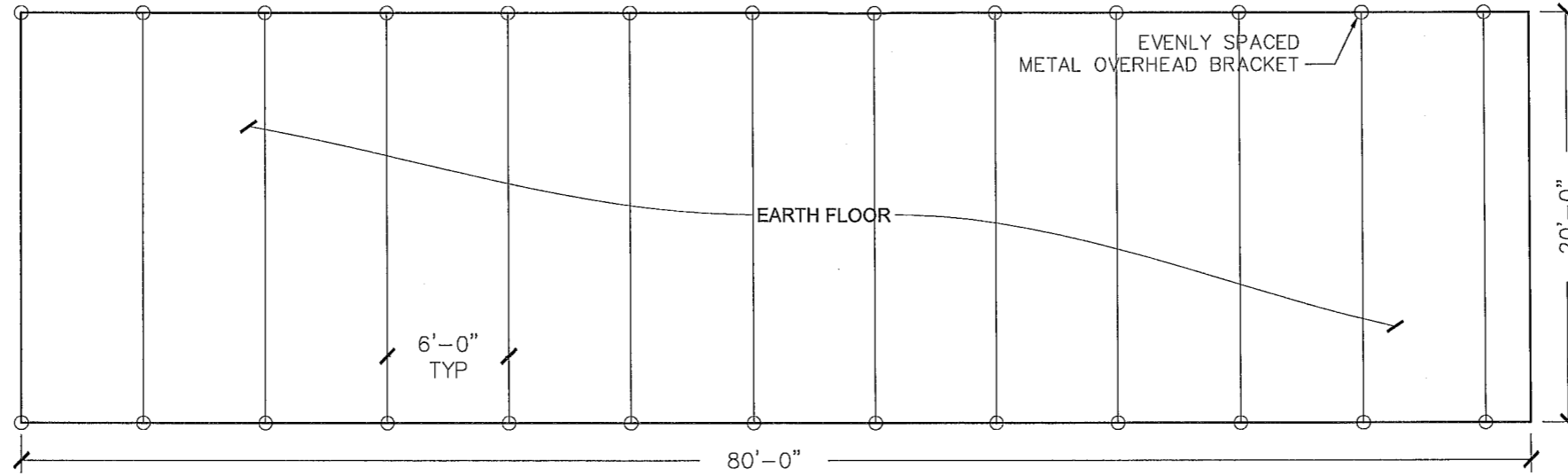
**Manhard**  
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6111 Street, Suite A, Eureka, CA 95501 Tel: (707) 425-8300  
 Fax: (707) 425-8301  
 www.manhardconsulting.com  
 Environmental Science - Landscaping Architecture - Planning  
 Construction Management - Environmental Science - Landscaping Architecture - Planning

PURE NATURE, LLC.  
 444 DREW DRIVE, GARBERVILLE, CA 95589 APN: 223-132-001  
 CULTIVATION FACILITY FLOOR PLAN

PROJ. MGR.: PCW  
 PROJ. ASSOC.: TW  
 DRAWN BY: TJS  
 DATE: 08-05-16  
 SCALE: AS NOTED

SHEET  
**C4**  
 CHEGACA01  
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December 7, 2017 - 10:15 AM - Draw Name: E:\Projects\CUP\Drawings\Plan Set\CHEGACA01 - CUP - option 1.dwg - Updated By: harrif



**GREENHOUSES**

22x34 SHEET: 1"=4'  
 11x17 SHEET: 1"=8'  
 0 2 4 8

NO.	DATE	BY	CHKD

**Manhard**  
**CONSULTING**  
611 West State A. Eureka, CA 95502 Tel: (707) 444-5901 Fax: (707) 444-3282 www.manhard.com  
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**PURE NATURE, LLC.**  
**444 DREW DRIVE, GARBERVILLE, CA 95589 APN: 223-132-001**  
**GREENHOUSE FLOOR PLANS**

PROJ. MGR: POW  
 PROJ. ASSOC: TW  
 DRAWN BY: TJS  
 DATE: 11-30-17  
 SCALE: AS NOTED

SHEET  
**C5**  
 CHEGACA01  
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**CONSTRUCTION SITE STORM WATER SOIL LOSS & POLLUTION PREVENTION PLAN (SLPPP)**

**ENGINEER'S DECLARATION**

THIS SLPPP WAS PREPARED BY ME OR UNDER MY DIRECTION AND IS BASED UPON CURRENT KNOWLEDGE OF AVAILABLE CONSTRUCTION SITE BEST MANAGEMENT PRACTICES (BMPs) FOR EROSION CONTROL, SEDIMENT CONTROL, AND POLLUTION PREVENTION.

PRAJ O. WHITE, PE #C65025

DATED:

**GENERAL INFORMATION AND REQUIREMENTS**

1. EROSION CONTROL, SEDIMENT CONTROL, AND POLLUTION PREVENTION MEASURES SHALL BE INSTALLED ACCORDING TO THE REQUIREMENTS OF THE CONSTRUCTION SITE EROSION CONTROL ORDINANCE. (EUREKA MUNICIPAL CODE SECTIONS 150.200 THROUGH 150.217)
2. FOR PURPOSES OF THIS SLPPP, THE SITE CONTRACTOR IS ASSUMED TO BE THE LANDOWNER'S REPRESENTATIVE AND THE ENTITY RESPONSIBLE FOR IMPLEMENTATION OF ALL BMPs.
3. THE SITE CONTRACTOR OWNER SHALL INSPECT ALL EROSION AND SEDIMENT CONTROL BMPs FOLLOWING EACH SIGNIFICANT RAINFALL EVENT (AT A MINIMUM) TO VERIFY THAT ALL MEASURES ARE IN PROPER WORKING ORDER.
4. IN THE EVENT THAT ANY EROSION OR SEDIMENT CONTROL BMP FAILS, THE SITE CONTRACTOR IS RESPONSIBLE FOR IMMEDIATELY REPORTING SUCH A FAILURE TO THE ENGINEER. THE ENGINEER SHALL ADVISE THE SITE CONTRACTOR OF NECESSARY REMEDIAL ACTIONS, AND THE SITE CONTRACTOR SHALL CORRECT THE SITUATION.

**EROSION CONTROL BMPs**

**PROJECT SCHEDULING:**

1. SITE GRADING WORK AND OTHER LAND DISTURBING ACTIVITIES SHOULD BE SCHEDULED SO AS TO MINIMIZE THE AMOUNT OF SOIL EXPOSURE AND THE DURATION OF SOIL EXPOSURE TO WIND, RAIN AND VEHICLE TRACKING.
2. SITE CLEARING, GRADING, EXCAVATION, FOUNDATION WORK AND UTILITY INSTALLATION SHOULD BE SEQUENCED SUCH THAT THE AMOUNT OF SOIL EXPOSED TO WIND, RAIN AND VEHICLE TRACKING IS MINIMIZED AT ALL TIMES.
3. ALL GRADING WORK SHALL OCCUR BETWEEN APRIL 15TH AND OCTOBER 15TH. ALL OTHER LAND DISTURBING ACTIVITIES SHOULD BE MINIMIZED OUTSIDE OF THESE DATES.
4. UNLESS OTHERWISE NOTED, ALL EROSION AND SEDIMENT CONTROL MEASURES SHALL BE IN PLACE PRIOR TO OCTOBER 15TH AND/OR PRIOR TO ANY RAIN EVENT WITH A 72-HOUR FORECAST OF 40% CHANCE OR GREATER. THE SITE CONTRACTOR SHALL BE RESPONSIBLE FOR MONITORING DAILY FORECASTS FOR RAINFALL AS NECESSARY TO COMPLY WITH THIS PROVISION.
5. ALL SOIL STABILIZATION MEASURES INVOLVING THE INSTALLATION OF PHYSICAL DEVICES OR THE PLANTING OF VEGETATION SHALL BE INSTALLED IN ADVANCE OF PREDICTED OR PROBABLE RAINFALL EVENTS AS NECESSARY FOR THOSE MEASURES TO BE EFFECTIVE.

**PRESERVATION OF EXISTING VEGETATION:**

1. EXISTING VEGETATION SHOULD BE PRESERVED FOR EROSION AND SEDIMENT CONTROL WHENEVER AND WHEREVER POSSIBLE.
2. AREAS NOT TO BE DISTURBED SHALL BE CLEARLY MARKED AND/OR FENCED PRIOR TO THE COMMENCEMENT OF SOIL-DISTURBING ACTIVITIES, AND ALL CONTRACTORS ON-SITE SHALL BE NOTIFIED OF THESE AREAS.

**SEDIMENT CONTROL BMPs**

**FIBER ROLLS:**

1. FIBER ROLLS SHALL BE INSTALLED AT ALL LOCATIONS INDICATED ON THE SLPPP, AND AT ANY OTHER LOCATION DEEMED NECESSARY BY THE SITE CONTRACTOR.
2. FIBER ROLLS SHOULD BE USED ALONG THE FACE OF EXPOSED SLOPES TO SHORTEN SLOPE LENGTH AND DECREASE FLOW VELOCITY; AT GRADE BREAKS WHERE SLOPES TRANSITION TO STEEPER SLOPES; AND ALONG STREAM BANKS TO ASSIST STABILIZATION, AND IN DRAINAGE SWALES TO SLOW FLOWS. ON 1:1 SLOPES PLACE FIBER ROLLS SPACED AT 10' INTERVALS PARALLEL TO SLOPE, ON 1.5:1 SLOPES PLACE FIBER ROLLS SPACED AT 15' INTERVALS PARALLEL TO SLOPE, AND ON 2:1 SLOPES PLACE FIBER ROLLS SPACED AT 20' INTERVALS PARALLEL TO SLOPE.
3. FIBER ROLLS SHALL CONSIST OF BIODEGRADABLE FIBERS STUFFED INTO A PHOTO-DEGRADABLE OPEN WEAVE NETTING. THEY SHALL BE DESIGNED TO ALLOW WATER TO PASS THROUGH THE FIBERS; TO TRAP SUSPENDED SEDIMENT; INCREASE FILTRATION RATES; AND TO SLOW RUNOFF.
4. FIBER ROLLS SHALL BE PLACED SUCH THAT THEY OVERLAP AND FOLLOW THE CONTOUR LINES OF THE SLOPE ON WHICH THEY ARE PLACED.
5. FIBER ROLLS SHALL BE INSPECTED PERIODICALLY THROUGHOUT THE COURSE OF CONSTRUCTION, ONCE AFTER EACH RAINFALL EVENT, AND ONCE EVERY 24 HOURS DURING EXTENDED RAINFALL EVENTS. ANY SPLIT, TORN, UNRAVELED OR SLUMPING FIBER ROLLS SHALL BE REPAIRED OR REPLACED IMMEDIATELY.

**DUST CONTROL:**

1. DUST CONTROL MEASURES SHALL BE IMPLEMENTED AS NECESSARY TO PREVENT SOILS AND DUSTS FROM BEING TRANSPORTED BY WIND. DUST CONTROL MAY BE ACHIEVED BY CHEMICAL AND/OR STRUCTURAL MEANS.
2. CHEMICAL DUST CONTROL MEASURES INCLUDE APPLYING WATER, SALTS OR ORGANIC SPRAY-ON ADHESIVES TO EXPOSED AREAS. EXCESSIVE OR IMPROPER USE OF CHEMICAL DUST CONTROL MEASURES MAY CAUSE UNWANTED NON-STORM WATER DISCHARGES, AND MUST THEREFORE BE AVOIDED.
3. STRUCTURAL DUST CONTROL MEASURES INCLUDE COVERING EXPOSED AREAS WITH BLANKETS, GEOTEXTILES OR TARPS. SUCH COVERINGS MUST BE PROPERLY ANCHORED TO RESIST HIGH WINDS.
4. DUST CONTROL MEASURES SHALL BE APPLIED TO ALL EXPOSED AREAS DURING AND MATERIAL STOCKPILES AT PHASES OF CONSTRUCTION BETWEEN INITIAL GROUND DISTURBANCE AND THE COMPLETION OF PAVING, LANDSCAPING, AND SITE CLEANUP.
5. ALL AREAS AND MATERIAL STOCKPILES EXPOSED TO EXCESSIVE WINDS OR VEHICLE TRAFFIC SHOULD BE INSPECTED DAILY FOR ADEQUATE DUST CONTROL. ANY MEASURES DEEMED NECESSARY TO PROTECT SUCH AREAS FROM AIRBORNE DUST AND SOIL LOSS SHOULD BE IMPLEMENTED IMMEDIATELY.

**LANDSCAPE MANAGEMENT:**

1. LANDSCAPE MANAGEMENT MEASURES SHALL BE IMPLEMENTED AS NECESSARY TO REDUCE EROSION, DECREASE SEDIMENT RUNOFF, AND TO PREVENT THE DISCHARGE OF SEDIMENT INTO STORMDRAINS AND WATERCOURSES.
2. ALL LANDSCAPE-RELATED GRADING AND EXCAVATION SHALL BE SCHEDULED FOR DRY WEATHER.
3. ALL EXPOSED AREAS SHALL BE HYDRO-MULCHED, HYDRO-SEEDED OR OTHERWISE LANDSCAPED PRIOR TO OCTOBER 15TH.
4. NATIVE, NON-INVASIVE, DROUGHT-TOLERANT AND PEST-TOLERANT VEGETATION SHOULD BE USED WHENEVER POSSIBLE.
5. NON-TOXIC CHEMICALS SHOULD BE USED WHENEVER POSSIBLE. CHEMICAL USE SHOULD BE LIMITED TO THE MINIMUM AMOUNT NECESSARY.
6. ALL LANDSCAPING AND OTHER STOCKPILED MATERIALS SHALL BE STORED UNDER PROPERLY-ANCHORED TARPS OR OTHER COVERINGS AT ALL TIMES TO PROTECT THEM FROM EXPOSURE TO WIND AND RAIN.
7. ALL RE-VEGETATED AREAS SHALL BE INSPECTED PERIODICALLY THROUGHOUT THE COURSE OF CONSTRUCTION, AND ONCE AFTER EACH RAINFALL EVENT. ANY UNDER-ESTABLISHED AREAS SHOULD BE REPLANTED AS NECESSARY.

**POLLUTION PREVENTION BMPs**

**SPILL PREVENTION AND CONTROL:**

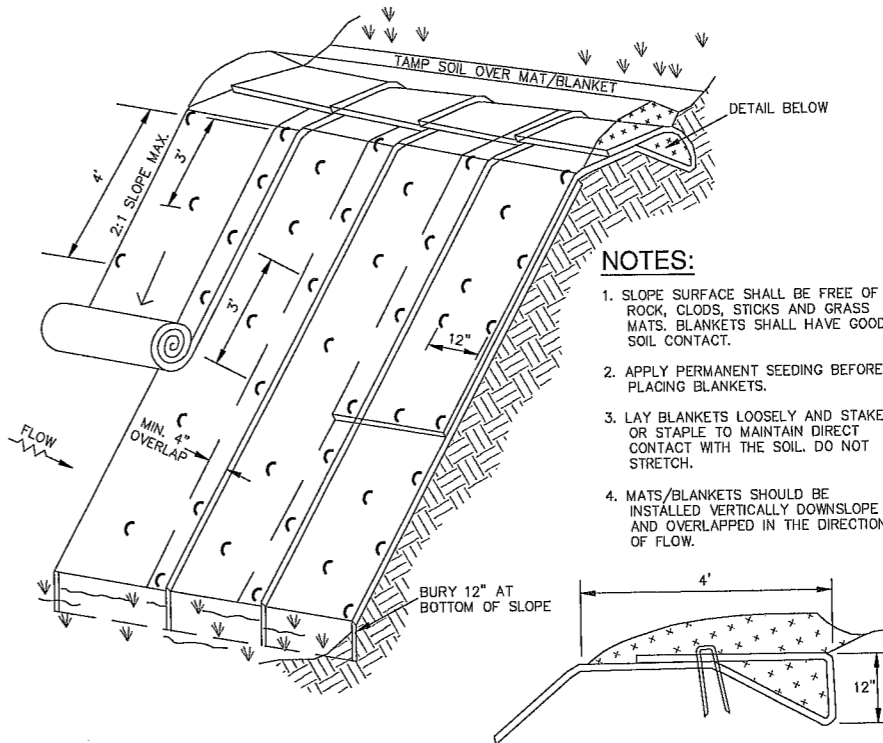
1. SPILL PREVENTION AND CONTROL MEASURES SHALL BE IMPLEMENTED AS NECESSARY TO PREVENT THE DISCHARGE OF HAZARDOUS AND NON-HAZARDOUS MATERIALS INTO SITE SOILS, STORM DRAINS, WATERCOURSES. HAZARDOUS AND NON-HAZARDOUS MATERIALS INCLUDE, BUT ARE NOT LIMITED TO FUELS, LUBRICANTS, PAINTS, SOLVENTS, CEMENT, MORTAR, HERBICIDES AND FERTILIZERS.
2. DESIGNATED STORAGE AREAS FOR ALL HAZARDOUS AND NON-HAZARDOUS MATERIALS SHALL BE PROVIDED ON-SITE AS INDICATED ON THE SLPP, AND ALL CONTRACTORS ON-SITE SHALL BE NOTIFIED OF SUCH AREAS.
3. ALL ON-SITE FLUID CONTAINERS SHALL BE LEAK-PROOF.
4. ANY FUELING AREAS (IF PRESENT) SHALL BE DESIGNATED BY THE SITE CONTRACTOR, SHALL BE LOCATED AWAY FROM STORMDRAINS AND WATERCOURSES, SHALL BE PROPERLY CONTAINED WITH BERMS, SANDBAGS OR OTHER APPROPRIATE BARRIERS, AND ALL CONTRACTORS ON-SITE SHALL BE NOTIFIED OF SUCH AREAS.
5. ANY CONTAINMENT FACILITIES FOR HAZARDOUS MATERIAL STORAGE (IF PRESENT) SHALL BE DESIGNATED BY THE SITE CONTRACTOR, SHALL BE LOCATED AWAY FROM STORMDRAINS AND WATERCOURSES, SHALL BE PROPERLY CONTAINED WITH BERMS, SANDBAGS OR OTHER APPROPRIATE BARRIERS, AND ALL CONTRACTORS ON-SITE SHALL BE NOTIFIED OF SUCH FACILITIES.
6. APPROPRIATE SPILL CONTROL PLANS AND CLEANUP MATERIALS FOR EACH FUEL AND CHEMICAL ON-SITE SHALL BE LOCATED NEAR MATERIAL STORAGE, USE AREAS AND FUELING AREAS. CONTROL PLANS AND CLEANUP MATERIALS SHALL BE UPDATED REGULARLY, BASED ON WHICH FUELS AND CHEMICALS ARE PRESENT AND IN USE ON-SITE.
7. WHEN A HAZARDOUS SPILL OCCURS, IMMEDIATELY NOTIFY THE STATE OFFICE OF EMERGENCY SERVICE (OES) AT 1.800.852.7550.

**WATER / RUNOFF CONSERVATION MEASURES:**

1. ALL WATER EQUIPMENT SHALL BE KEPT IN GOOD WORKING CONDITION, AND SHALL BE INSPECTED AT LEAST TWICE WEEKLY. ANY LEAKY EQUIPMENT SHALL BE REPAIRED IMMEDIATELY.
2. IRRIGATION CONTROLLERS, IF ANY, SHALL BE SET ACCORDING TO SEASONAL NEEDS.
3. THE SITE CONTRACTOR SHALL AVOID CLEANING CONSTRUCTION AREAS WITH WATER, WHENEVER PRACTICAL, AND SHALL NOT USE SOAPS OR CHEMICALS FOR SUCH PURPOSES. ANY CONSTRUCTION WASH-WATER RUNOFF SHOULD BE DIRECTED TO AREAS WHERE IT WILL BE CONTAINED AND PROPERLY DISPOSED OF, OR WHERE IT WILL SAFELY INFILTRATE INTO THE GROUND.

**VEHICLE AND EQUIPMENT MAINTENANCE:**

1. ALL MAJOR MAINTENANCE, FUELING AND WASHING OF CONSTRUCTION VEHICLES AND EQUIPMENT SHALL BE CONDUCTED OFF-SITE WHENEVER FEASIBLE.
2. ALL CONSTRUCTION VEHICLES AND EQUIPMENT SHALL BE REGULARLY MAINTAINED AND INSPECTED FOR DAMAGED HOSES, LEAKY GASKETS AND OTHER SERVICE PROBLEMS. ANY NECESSARY REPAIRS SHALL BE MADE IMMEDIATELY.
3. VEHICLE AND EQUIPMENT SERVICE AND STORAGE AREAS (IF PRESENT) SHALL BE DESIGNATED BY THE SITE CONTRACTOR, SHALL BE LOCATED AWAY FROM STORMDRAINS AND WATERCOURSES, SHALL BE PROPERLY CONTAINED WITH BERMS, SANDBAGS OR OTHER APPROPRIATE BARRIERS, AND ALL CONTRACTORS ON-SITE SHALL BE NOTIFIED OF SUCH AREAS.
4. ANY DRAINING OR REPLACING OF FLUIDS ON-SITE FOR CONSTRUCTION VEHICLES AND EQUIPMENT SHALL EMPLOY DRIP PANS, DRIP CLOTHS, AND OTHER APPROPRIATE EQUIPMENT AS NECESSARY TO COMPLETELY CONTAIN AND TO PROPERLY DISPOSE OF ALL SUCH FLUIDS.
5. VEHICLE AND EQUIPMENT SERVICE AND STORAGE AREAS (IF PRESENT) SHALL BE INSPECTED AT LEAST TWICE WEEKLY. ANY NECESSARY REPAIRS OR UPGRADES TO THESE AREAS OR THEIR ASSOCIATED CONTAINMENT BARRIERS SHALL BE MADE IMMEDIATELY.
6. CONSTRUCTION VEHICLES AND EQUIPMENT SHALL BE WASHED AT COMMERCIAL WASHING FACILITIES WHENEVER POSSIBLE. ANY NECESSARY ON-SITE VEHICLE AND EQUIPMENT WASHING SHALL BE CONDUCTED AT THE DESIGNATED CONCRETE WASHOUT FACILITY, OR OTHER APPROPRIATELY DESIGNATED AND CONTAINED FACILITIES. SOAPS AND CHEMICALS SHALL NOT BE USED FOR SUCH PURPOSES, AND ALL ASSOCIATED RUNOFF SHALL BE DIRECTED TO AREAS WHERE IT WILL BE CONTAINED AND PROPERLY DISPOSED OF, OR WHERE IT WILL SAFELY INFILTRATE INTO THE GROUND.

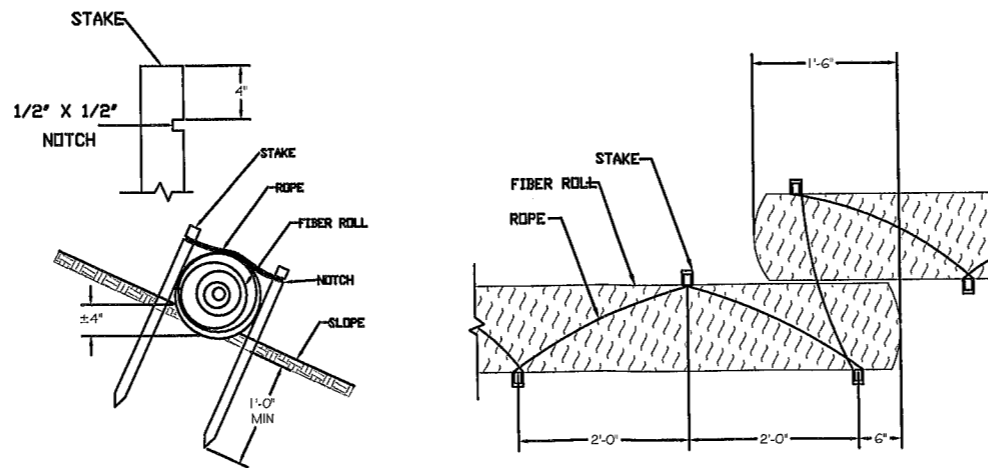


**NOTES:**

1. SLOPE SURFACE SHALL BE FREE OF ROCK, CLODS, STICKS AND GRASS. MATS, BLANKETS SHALL HAVE GOOD SOIL CONTACT.
2. APPLY PERMANENT SEEDING BEFORE PLACING BLANKETS.
3. LAY BLANKETS LOOSELY AND STAKE OR STAPLE TO MAINTAIN DIRECT CONTACT WITH THE SOIL. DO NOT STRETCH.
4. MATS/BLANKETS SHOULD BE INSTALLED VERTICALLY DOWNSLOPE AND OVERLAPPED IN THE DIRECTION OF FLOW.

**JUTE MAT/BLANKET DETAILS**

NOT TO SCALE



**FIBER ROLL DETAIL**

NOT TO SCALE

PURE NATURE, LLC.

444 DREW DRIVE, GARBERVILLE, CA 95589 APN: 223-132-001

EROSION CONTROL NOTES

PROJ. NO.: POW  
 PROJ. ASSOC.: IW  
 DRAWN BY: STP  
 DATE: 11/06/2015  
 SCALE: AS NOTED

SHEET

**C6**

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 Construction Managers • Environmental Scientists • Landscape Architects • Planners



## ATTACHMENT 1

### RECOMMENDED CONDITIONS OF APPROVAL

**APPROVAL OF THE CONDITIONAL USE PERMIT IS CONDITIONED ON THE FOLLOWING TERMS AND REQUIREMENTS WHICH MUST BE SATISFIED BEFORE THE PROVISIONAL CANNABIS CULTIVATION PERMIT CAN BE FINALIZED.**

1. Within 60 days of project approval, the applicant shall execute a Compliance Agreement with the Humboldt County Planning Department detailing all necessary permits and infrastructure improvements described under Conditions of Approval #2 through #16. The agreement shall provide a timeline for completing all outstanding items. All activities detailed under the agreement must be completed to the satisfaction of the Planning and Building Department before the permit may be finalized and no longer considered provisional.
2. The applicant shall secure permits for all structures and graded areas related to the cannabis cultivation and other commercial cannabis activity. The graded areas and structures shall be reviewed by the County Building Division and will be reviewed for consistency with applicable State, Federal, and local regulations of building standards, including those related to slope stability, ground shaking, and geologic risk. A letter or similar communication from the Building Division verifying that all structures and graded areas related to cannabis cultivation are permitted will satisfy this condition.
3. 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.
4. The applicant shall install an Onsite Wastewater Treatment System (OWTS) to serve the processing facility within one year and obtain final approval within two years of approval of the project by the Planning Department. A portable sink and toilet will be rented from a portable toilet contractor during peak times for use by the employees assisting with cultivation. The applicant will keep the receipts for the rentals to show compliance with this condition prior to annual inspections. A letter from the Department of Environmental Health indicating approval has been issued will satisfy this condition.
5. The applicant shall obtain an encroachment permit from the Department of Public Works for improvements to the intersection of Alderpoint Road and Sawmill Road. A letter or similar communication from the Department of Public Works stating this requirement is met will satisfy this condition.
6. The applicant shall submit a lighting to the Planning Department that describes how the project will comply with International Dark Sky Association standards for Lighting Zone 0 and Lighting Zone 1, and be designed to regulate light spillage onto neighboring properties resulting from backlight, uplight, or glare (BUG).
7. The applicant shall adhere to the Final Lake and Streambed Alteration Agreement (Notification #1600-2016-0158-R1) effective June 30, 2016, by the California Department of Fish and Wildlife (CDFW) and comply with all applicable terms. The LSAA shall be amended to include the culvert replacements described by the Nate Chevalier Less Than Three Acre Conversion Mitigation Plan prepared by Mad River Properties, Inc. dated December 11, 2017. If the existing agreement cannot be amended, the applicant shall secure and adhere to a second agreement with CDFW for the culvert replacements. A letter or copy of the amended agreement will satisfy this condition.

8. The applicant shall obtain the appropriate surface water diversion rights from the California State Water Resources Control Board and the Division of Water Rights (see Ongoing Requirements/Development Restrictions Which Must be Satisfied for the Life of the Project Condition #5).
9. The Applicant shall agree to use a water meter to demonstrate that there is sufficient water supply to meet the demands of the project without having to rely on surface water diversion. The water use for cultivation is limited to the amount of water available in the proposed pond.
10. Noise generated from the emergency backup generator shall comply with the standards set forth in Section 55.4.11(o) of the CMMLUO which requires the combined decibel level for all noise sources to be no more than 60 decibels at the property line.
11. The applicant shall contact the local fire service provider [Garberville Fire Protection District] and furnish written documentation from that agency of the available emergency response and fire suppression services and any recommended project mitigation measures. Mitigation measures shall be incorporated into the project, if applicable. If emergency response and fire suppression services are not provided, the applicant shall cause to be recorded an "ACKNOWLEDGMENT OF NO AVAILABLE EMERGENCY RESPONSE AND FIRE SUPPRESSION SERVICES" for the parcel(s) on a form provided by the Humboldt County Planning Division. Document review fees as set forth in the schedule of fees and charges as adopted by ordinance of the Humboldt County Board of Supervisors will be required.
12. Prior to issuance of any building or construction permits, a revised site plan shall be prepared by the applicant and reviewed and approved by the Planning Division showing:
  - a. Adequate off-street parking.
  - b. Compliance with emergency vehicle access requirements.
  - c. Revised water storage removing the proposed water storage pond and showing the location of the two 25,000-gallon water tanks.
13. The applicant shall implement all corrective actions detailed within the Water Resource Protection Plan developed for the parcel, prepared pursuant to Tier 2 enrollment under the North Coast Regional Water Quality Control Board Cannabis Waste Discharge Regulatory Program, including those measures later determined necessary during annual and periodic site inspections in accordance with the monitoring element. A copy of the reporting form portion of the Mitigation and Reporting Program (MRP) shall be submitted annually to the Planning and Building Department concurrent with the submittal to the RWQCB. A letter or similar communication from the RWQCB verifying that all their requirements have been met by the listed dates or the applicant has proven to the satisfaction of RWQCB or the Third Party Consultant verifying that all the requirements in the MRP have been met will satisfy this condition. [After July 31, 2019, plans and reporting shall conform to the Cannabis Cultivation Policy and Cannabis General Order adopted October 17, 2017 by the State Water Board.]
14. 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.
15. The applicant 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 Department will provide a bill to the applicant after the decision. Any and all outstanding Planning fees to cover the processing of the application to decision by the Hearing Officer shall be paid to the Humboldt County Planning Division, 3015 "H" Street, Eureka.

**Ongoing Requirements/Development Restrictions Which Must Be Satisfied for the Life of the Project:**

1. All components of 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. Changes shall require modification of this permit except where consistent with Humboldt County Code Section 312-11.1, Minor Deviations to Approved Plot Plan.
2. Cannabis cultivation and other commercial cannabis activity shall be conducted in compliance with all laws and regulations as set forth in the CMMLUO and MCRSA, as applicable to the permit type.
3. If operating pursuant to a written approved compliance agreement, permittee shall abate or cure violations at the earliest feasible date, but in no event no more than two (2) years from the date of issuance of a provisional clearance or permit. Permittee shall provide plans for curing such violations to the Planning & Building Department within one (1) year of issuance of the provisional clearance or permit. If good faith effort towards compliance can be shown within the two years following the issuance of the provisional clearance or permit, The Planning Department may, at the discretion of the Director, provide for extensions of the provisional permit to allow for additional time to meet the outstanding requirements.
4. Possession of a current, valid required license, or licenses, issued by any agency of the State of California in accordance with the MCRSA, and regulations promulgated thereunder, as soon as such licenses become available.
5. Compliance with all statutes, regulations and requirements of the California State Water Resources Control Board and the Division of Water Rights, at a minimum to include a statement of diversion of surface water from a stream, river, underground stream, or other watercourse required by Water Code Section 5101, or other applicable permit, license, or registration, as applicable.
6. 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 55.4.11(d).
7. Maintain enrollment in Tier 1, 2 or 3, certification with the North Coast Regional Water Quality Control Board (NCRWQCB) Order No. R1-2015-0023, if applicable, or any substantially equivalent rule that may be subsequently adopted by the County of Humboldt or other responsible agency.
8. Comply with the terms of any applicable Streambed Alteration (1600) Permit obtained from the California Department of Fish & Wildlife.
9. 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 – Friday, 9:00 am – 5:00 pm, excluding holidays).
10. Refrain from the improper storage or use of any fuels, fertilizer, pesticide, fungicide, rodenticide, or herbicide.
11. Pay all applicable application and annual inspection fees.
12. The noise produced by a generator used on an emergency-only basis for cannabis drying, curing, and processing shall not be audible by humans from neighboring s. The decibel level for generators measured at the property line shall be no more than 60 decibels. Where applicable, sound levels must also show that they will not result in the harassment of Marbled Murrelet or Spotted Owl species. Conformance will be evaluated using current auditory disturbance guidance prepared by the United State Fish and Wildlife Service, and further consultation where necessary. Under these guidelines,

generator noise may not exceed 50dB as measured at 100 feet from the generator or at the edge of the nearest Marbled Murrelet or Spotted Owl habitat, whichever is closer.

13. Storage of Fuel - Fuel shall be stored and handled in compliance with applicable state and local laws and regulations, including the County of Humboldt's CUPA program, and in such a way that no spillage occurs.
14. The Master Log Books maintained by the applicant to track production and sales shall be maintained for inspection by the County.
15. Pay all applicable taxes as required by the Humboldt County Commercial Marijuana Cultivation Tax Ordinance (Humboldt County Code Section 719-1 et seq.).
16. The operation shall participate in the Medical Cannabis Track and Trace Program administered by the Humboldt County Agricultural Commissioner, when available.

#### Performance Standards for Cultivation and Processing Operations

17. Pursuant to the MCRSA, Health and Safety Code section 19322(a)(9), an applicant seeking a cultivation license shall "provide a statement declaring the applicant 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."
18. 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, California Agricultural Labor Relations Act, and the Humboldt County Code (including the Building Code).
19. 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.
20. 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;
  - (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) On site-housing provided to employees shall comply with all applicable federal, state, and local laws and regulations.

21. 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) On-site housing, if any.

22. Term of Commercial Cannabis Activity Conditional Use Permit. Any Commercial Cannabis Cultivation CUP 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.

23. 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 CUP or permit holder with a written statement identifying the items not in compliance, and the action that the permit holder may take to cure the non-compliance, 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 reinspection to determine whether or not the permit holder has cured all issues of non-compliance. Failure to request reinspection or to cure any items of non-compliance shall terminate the Special Permit, immediately upon the expiration of any appeal period, or final determination of the appeal if an appeal has been timely filed pursuant to section 55.4.13.

24. Permit Renewals to comply with Updated Laws and Regulations. Permit renewal per Ongoing Condition of Approval #22 above 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.

25. 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.

26. Permittee further acknowledges and declares that:

- (1) All commercial cannabis activity that I, my agents, or employees conduct pursuant to a permit from the County of Humboldt for commercial cultivation, processing, manufacturing, and distribution of cannabis for adult use or medicinal use within the inland area of the County of Humboldt, shall at all times be conducted consistent with the provisions of the approved County permit; and
- (2) All cannabis or cannabis products under my control, or the control of my agents or employees, and cultivated or manufactured pursuant to local Ordinance and the State of California Medicinal and Adult Use Cannabis Regulation and Safety Act ("MAUCRSA") (SB 94), will be distributed within the State of California; and
- (3) All commercial cannabis activity conducted by me, or my agents or employees pursuant to a permit from the County of Humboldt will be conducted in compliance with the State of California MAUCRSA

27. 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; and
- d) Acknowledgement of full responsibility for complying with the existing Permit; and
- e) Execution of an Affidavit of Non-diversion of Medical Cannabis.

28. 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. Pursuant to Section 314-55.4.11(a) of the CMMLUO, if upon inspection for the initial application, violations of any building or other health, safety, or other state of county statute, ordinance, or regulation are discovered, the Planning and Building Department may issue a provisional clearance or permit with a written approved Compliance Agreement. By signing the agreement, the permittee agrees to abate or cure the violations at the earliest opportunity but in no event more than two (2) years of the date of issuance of the provisional clearance or permit. Plans for curing the violations shall be submitted to the Planning and Building Department by the Permittee within one (1) year of the issuance of the provisional certificate or permit. The terms of the compliance agreement may be appealed pursuant to section 314-55.4.13 of the CMMLUO.
2. This provisional permit approval shall expire and become null and void at the expiration of one (1) year after all appeal periods have lapsed (see "Effective Date"); except where the Compliance Agreement per Condition of Approval #1 has been executed and the corrective actions pursuant to the agreement are being undertaken. Once building permits have been secured and/or the use initiated pursuant to the terms of the agreement, the use is subject to the Permit Duration and Renewal provisions set forth in Conditions of Approval #23 of the On-Going Requirements /Development Restrictions, above.
3. If cultural resources are encountered during construction activities, the contractor on site shall cease all work in the immediate area and within a 50-foot buffer of the discovery location. A qualified

archaeologist as well as the appropriate Tribal Historic Preservation Officer(s) are to be contacted to evaluate the discovery and, in consultation with the applicant and 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 Section 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 Section 5097.98. Violators shall be prosecuted in accordance with Public Resources Code Section 5097.99.

4. The applicant 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 Department will provide a bill to the applicant after the decision. Any and all outstanding Planning fees to cover the processing of the application to decision by the Hearing Officer shall be paid to the Humboldt County Planning Division, 3015 "H" Street, Eureka.
5. The Applicant is responsible for costs for post-approval review for determining project conformance with conditions 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 Department will send a bill to the Applicant for all staff costs incurred for review of the project for conformance with the conditions of approval. All Planning fees for this service shall be paid to the Humboldt County Planning Division, 3015 "H" Street, Eureka.
6. A Notice of Exemption (NOE) will be prepared and filed with the County Clerk for this project in accordance with the State CEQA Guidelines. **Within three days of the effective date of permit approval**, it is requested that the applicant submit a check or money order for the required filing fee in the amount of \$50 payable to the Humboldt County Clerk/Recorder. If this payment is not received within this time period, the Department will file the NOE and will charge this cost to the project.
7. If any wildlife is encountered during the authorized activity, the applicant shall not disturb the wildlife and shall allow wildlife to leave the work site unharmed.
8. The Applicant is responsible for costs for post-approval review for determining project conformance with conditions prior to release of building permit or initiation of use and at time of annual inspection. In order to demonstrate that all conditions have been satisfied, applicant is required to pay the 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 \$750) 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.

## ATTACHMENT 2

### STAFF ANALYSIS OF THE EVIDENCE SUPPORTING THE REQUIRED FINDINGS

**Required Findings:** To approve this project, the Hearing Officer must determine that the applicant has submitted evidence in support of making **all** of the following required findings.

The County Zoning Ordinance, Sections 312-1.1.2 and 312-17.1 of the Humboldt County Code (Required Findings for All Discretionary Permits) specify the findings that are required to grant a Conditional Use Permit:

1. The proposed development is in conformance with the County General Plan;
2. The proposed development is consistent with the purposes of the existing zone in which the site is located;
3. The proposed development conforms with all applicable standards and requirements of these regulations;
4. The proposed development and conditions under which it may be operated or maintained will not be detrimental to the public health, safety, or welfare, or materially injurious to property or improvements in the vicinity;
5. The proposed development does not reduce the residential density for any parcel below that utilized by the California Department of Housing and Community Development in determining compliance with housing element law (the midpoint of the density range specified in the plan designation) unless the following written findings are made supported by substantial evidence: (1) the reduction is consistent with the adopted general plan including the housing element; and (2) the remaining sites identified in the housing element are adequate to accommodate the County's share of the regional housing need; and (3) the property contains insurmountable physical or environmental limitations and clustering of residential units on the developable portions of the site has been maximized; and
6. In addition, the California Environmental Quality Act (CEQA) states that one of the following findings must be made prior to approval of any development which is subject to the regulations of CEQA. The project either:
  - a. Is categorically or statutorily exempt; or
  - b. Has no substantial evidence that the project will have a significant effect on the environment and a negative declaration has been prepared; or
  - c. Has had an environmental impact report (EIR) prepared and all significant environmental effects have been eliminated or substantially lessened, or the required findings in Section 15091 of the CEQA Guidelines have been made.



**Staff Analysis of the Evidence Supporting the Required Findings:** To approve this project, the Hearing Officer must determine that the applicant has submitted evidence in support of making **all** of the following required findings.

**1. The proposed development must be consistent with the General Plan.** The following table identifies the substantial evidence which supports finding that the proposed development is in conformance with all applicable policies and standards of the Humboldt County General Plan 2017.

Plan Section	Summary of Applicable Goal, Policy, or Standard	Evidence Which Supports Making the General Plan Conformance Finding
<p>Land Use Chapter 4</p> <p>Land Use Designations Section 4.8</p>	<p><b>Residential Agriculture (RA):</b>            Agricultural land preserved to the maximum extent possible for continued agricultural use in parcel sizes that support economically feasible agricultural operations</p> <p>Marginal timber, grazing, mining and quarrying, recreational areas, watershed and wildlife areas, with occasional rural residences.</p> <p>Resources production allowing intensive management opportunities, recreational uses, single-family residences, and cottage industries.</p> <p>Density range is 1 dwelling unit per 160 acres to one dwelling unit per 20 acres.</p>	<p>The project includes 13,384 square feet (sf) of cannabis cultivation, consisting of a 7,584-square-foot mixed light and 6,300-square-foot outdoor cultivation areas. Processing, including drying, curing and trimming of cannabis will occur on-site in a proposed 800-square-foot processing facility. General and intensive agriculture are allowed use types for this designation.</p>

Plan Section	Summary of Applicable Goal, Policy, or Standard	Evidence Which Supports Making the General Plan Conformance Finding
Circulation Chapter 7	<p>Goals and policies contained in this Chapter relate to a balanced, safe, efficient, accessible and convenient circulation system that is appropriate for each type of unincorporated community (C-G1, C-G2); coordinated planning design, development, operations, and maintenance between the County and other transportation system service providers (C-G3); and access for all transportation mode types with improved opportunities to move goods within, into and out of Humboldt County. (C-G4, C-G5)</p> <p>Related policies: C-P3. Consideration of Transportation Impacts in Land Use Decision Making</p>	<p>The subject parcel is accessed by Drew Drive. Drew Drive is located approximately 1.4 miles from the intersection of Sawmill Road and Alderpoint Road. The applicant completed a Road Evaluation Report indicating the access to the parcel is developed to the equivalent of a road category 4 standard. Upper Sawmill Road is maintained through the Upper Sawmill Road Association. In their response dated, February 1, 2018, the Department of Public Works recommended conditional approval of the project. Conditions of approval require the applicant to obtain an encroachment permit from the Department of Public Works to pave the intersection of Alderpoint Road and Sawmill Road.</p>
Housing Chapter 8	<p>Goals and policies contained in this Element seek to identify existing and projected housing needs and establish goals, policies, standards and measures for the preservation, improvement, and development of housing.</p> <p>Related policies: H-P3, Development of Parcels in the Residential Land Inventory</p>	<p>The proposed project does not involve residential development, nor is the project site part of the Housing Element, Residential Land Inventory. However, the proposed project will not preclude any future residential development on the project site or adjacent areas. The proposed project will 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.</p>

Plan Section	Summary of Applicable Goal, Policy, or Standard	Evidence Which Supports Making the General Plan Conformance Finding
<p>Conservation and Open Space Chapter 10</p> <p>Open Space Section 10.2</p>	<p>Goals and policies contained in this Chapter relate to an Open Space and Conservation Program that is complimentary to other agencies' plans and that preserves the county's unique open spaces (CO-G1,CO-G3)</p> <p>Related policies: CO-P1, Conservation and Open Space Program; CO-P12, Development Review, CO-S1, Identification of Local Open Space Plan, and CO-S2. Identification of the Open Space Action Program</p>	<p>The proposed project is located within Open Space Action Program because the project site is planned Residential Agriculture and zoned Unclassified. General Agriculture is a use type permitted in the Residential Agriculture land use designation. General agriculture is also a principal permitted use in the Unclassified zoning district. The proposed cannabis cultivation, an agricultural product, is within land planned and zoned for agricultural purposes, consistent with the use of Open Space land for managed production of resources. Therefore, the project is consistent with and complimentary to the Open Space Plan and its Open Space Action Program.</p> <p>The project site is located approximately 3 miles east of the nearest Marbled Murrelet habitat and approximately 2 miles south of the nearest mapped spotted owl location that is an activity center for Northern Spotted Owl. This is subject to the open space protections implemented through the Special Biological Areas overlay. The parcel contains Dean Creek, which crosses through the northern portion of the subject parcel (see Biological Resources Section 10.3 for additional discussion).</p>

Plan Section	Summary of Applicable Goal, Policy, or Standard	Evidence Which Supports Making the General Plan Conformance Finding
<p>Conservation and Open Space Chapter 10</p> <p>Biological Resources Section 10.3</p>	<p>Goals and policies contained in this Chapter relate to mapped sensitive habitat areas where policies are applied to protect fish and wildlife and facilitate the recovery of endangered species (BR-G1, Threatened and Endangered Species, BR-G2, Sensitive and Critical Habitat, BR-G3, Benefits of Biological Resources)</p> <p>Related policies: BR-P1, Compatible Land Uses, BR-P5, Streamside Management Areas.</p>	<p>The Biological Resource maps of the Humboldt County General Plan and California Natural Diversity Database (CNDDDB) identify habitat for <i>Rana boylei</i> (foothill yellow legged frog) in the northern central and northeastern portion of the subject parcel. All existing and proposed development is located outside of this area. on the project site. The WebGIS also identifies Dean Creek and a tributary to Dean Creek converging the northeastern parcel as well. The proposed project does not involve any development within the Streamside Management Area for Dean Creek. Water for irrigation uses is a rain catchment system that collects rainwater from roof structures and road ditch run-off. Water for domestic uses is supplied through a point of diversion located on an unnamed creek on the subject parcel. The applicant obtained a Final Lake and Streambed Alteration Agreement (LSAA, Notification #1600-2016-0158-R1) from the California Department of Fish and Wildlife for the point of diversion and improvements related to the water storage pond. The applicant has filed a Small Domestic Use Registration (SDUR) for the domestic use surface water diversion. Conditions of approval require the applicant to obtain appropriate water rights for the water stored for domestic use from the State Water Resources Control Board.</p> <p>The California Department of Fish Wildlife recommended conditional approval in their comments dated July 30, 2018. The conditions of approval require the applicant to adhere to the conditions recommended by CDFW in their comments.</p> <p>According to the WebGIS data, there is no Marbled Murrelet or Northern Spotted Owl activity centers or recorded sightings within 1 mile of the project site. The nearest recorded data is an activity center from June 2, 2003, at a site approximately 2 miles north of the project site. No trees will be removed for the project, and, although the project will use generators until the conventional grid power is installed at the property (scheduled for end of October), long term generator use will be minimal. Due to the lack of occurrences, minimal construction activities and use of potentially disturbing equipment such as generators, project activities are not anticipated to impact Northern Spotted Owl or Marbled Murrelet. Noise generated from the generators shall comply with the standards set forth in Section 55.4.11(o) of the CMMLUO which requires the combined decibel level for all noise sources to be no more than 60 decibels at the property line. Therefore, the project conforms with the referenced standard.</p>
<p>Conservation and Open</p>	<p>Goals and policies contained in this chapter relate to the</p>	<p>The Northwest Information Center identified no previous investigations that included the project site</p>

Plan Section	Summary of Applicable Goal, Policy, or Standard	Evidence Which Supports Making the General Plan Conformance Finding
<p>Space Chapter 10</p> <p>Cultural Resources Section 10.6</p>	<p>protection and enhancement of significant cultural resources, providing heritage, historic, scientific, educational, social, and economic values to benefit present and future generations (CU-G1, Protection and Enhancement of Significant Cultural Resources).</p> <p>Related policies: CU-P1, Identification and Protection; CU-P2, Native American Tribal Consultation</p>	<p>and recommended a survey. The Bear River Band of the Rohnerville Rancheria responded that the project is along the boundary of the Band's area of concern, but that there are no known sensitive resources. The Band also requested that the standard inadvertent archaeological discovery protocol be included as a condition of approval. Ongoing conditions of approval are incorporated regarding the inadvertent discovery protocol to protect cultural resources.</p>
<p>Conservation and Open Space Chapter 10</p> <p>Scenic Resources Section 10.6</p>	<p>Goals and policies contained in this Chapter relate to the protection of scenic areas that contribute to the enjoyment of Humboldt County's beauty and abundant natural resources (SR-G1); and a system of scenic highways roadways that increase the enjoyment of, and opportunities for, recreational and cultural pursuits and tourism in the County. (SR-G2)</p> <p>Related policies: SR-S4. Light and Glare</p>	<p>The project involves mixed-light cultivation. The CMLUO requires that mixed-light cultivation comply with International Dark Sky Association standards for Lighting Zone 0 and Lighting Zone 1, and be designed to regulate light spillage onto neighboring properties resulting from backlight, uplight, or glare (BUG). International Dark Sky Association standards exceed the requirements of Scenic Resources Standard SR-SX, Light and Glare, that lighting be fully shielded and designed and installed to minimize off-site lighting and direct light within the property boundaries. Conditions of approval require the applicant to submit a lighting to the Planning Department that describes how the project will comply with International Dark Sky Association standards for Lighting Zone 0 and Lighting Zone 1, and be designed to regulate light spillage onto neighboring properties resulting from backlight, uplight, or glare (BUG).</p>

Plan Section	Summary of Applicable Goal, Policy, or Standard	Evidence Which Supports Making the General Plan Conformance Finding
<p>Water Resources Chapter 11</p> <p>Stormwater Drainage</p>	<p>Goals and policies contained in this Chapter relate to coordinated watershed planning and land use decision making to advance management priorities (WR-G3, WR-G4, WR-G5); watershed conservation and restoration efforts aimed at de-listing water bodies and watersheds which are restored to meet all beneficial uses, including water use, salmon and steelhead recovery plans, recreational activities, and the economy. (WR-G1, WR-G2, WR-G7, WR-G8, WR-G9)</p> <p>Related policies: WR-P10. Erosion and Sediment Discharge; WR-42 Erosion and Sediment Control Measures.</p>	<p>The applicant has enrolled in the North Coast Regional Water Quality Control Board's (NCRWQCB's) Cannabis Waste Discharge Regulatory Program as a Tier 2 discharger. Conditions of Approval required the Applicant to submit a copy of the final WRPP to the Planning Department and implement all corrective measures.</p> <p>As directed by CAL FIRE, the applicant has a Less-Than-Three-Acre Mitigation Plan prepared by Mad River Properties, Inc. The report identified 11 road points that require improvements, including replacement of 3 culverts, monitoring of other culverts, recontouring of slopes and installation of rocked rolling dips. The report was re-referred to CAL FIRE on August 1, 2018, and no additional comments regarding this project were received. Conditions of approval require the applicant to adhere to the recommendations made in the Mad River Properties, Inc. Nate Chevalier Less Than Three Acre Conversion Mitigation Plan dated December 11, 2017. Conditions of approval also require the applicant to notify the California Department of Fish and Wildlife regarding the culvert replacements recommended in the report.</p>
<p>Water Resources Chapter 11</p> <p>Onsite Wastewater Systems</p>	<p>Goals and policies contained in this Chapter relate to adequate public water supply as well as onsite wastewater systems and natural and developed storm drainage systems that minimize interference with surface and groundwater flows and storm water pollution. (WR-G6, WR-G9, WR G10)</p> <p>Related policies: WR-IM7. Basin Plan Septic Requirements; and IS-P17. On-Site Sewage Disposal Requirements.</p>	<p>The subject parcel contains a permitted septic system that accommodates the residence. Referral comments from the Department of Environmental Health require the applicant to install an onsite wastewater treatment system (OWTS) to serve the processing facility within one year and obtain final approval within two years of approval of the project by the Planning Department. Conditions of approval for the project require the processing facility to meet County Code standards on-site wastewater treatment to accommodate the employees. A portable sink and toilet will be rented from a portable toilet contractor during peak times for use by the employees on-site for cultivation activities. The applicant will keep the receipts for the rentals to show compliance with this condition during annual inspections.</p>
<p>Noise Chapter 13</p>	<p>Goals and policies contained in this Chapter discourage incompatible uses within communities and reduce excessive noise through the application of standards. (N-G1, N-G2)</p> <p>Related policies: N-P1, Minimize Noise from Stationary and Mobile Sources; N-P4, Protection from Excessive Noise</p>	<p>The proposed project is for an existing 13,884-square-foot cannabis cultivation operation with 6,300 square feet of outdoor and 7,584 square feet of mixed-light cultivation areas. The power source is two small generators. The applicant is working with P. G. &amp; E. to bring conventional grid power to the subject parcel. The subject parcel is not located in an area that requires special noise attenuation measures. Noise generated from the emergency backup generator shall comply with the standards set forth in Section 55.4.11(o) of the CMMLUO and Department Policy Statement #DPS-16-005.</p>

Plan Section	Summary of Applicable Goal, Policy, or Standard	Evidence Which Supports Making the General Plan Conformance Finding
<p>Safety Element Chapter 14</p> <p>Geologic &amp; Seismic</p>	<p>Goals and policies contained in this Chapter relate to communities that are designed and built to minimize the potential for loss of life and property resulting from natural and manmade hazards; and to prevent unnecessary exposure to areas of geologic instability, floodplains, tsunami run-up areas, high risk wildland fire areas, and airport areas planned and conditioned to prevent unnecessary exposure of people and property to risks of damage or injury. (S-G1, S-G2)</p> <p>Related policies: S-P11. Site Suitability, S-P7. Structural Hazards.</p>	<p>The project site is not located in a mapped Alquist-Priolo fault zone nor is subject to liquefaction. The County's GIS shows the site in an area designated as Highly Unstable (3). The majority of the site is mapped by USGS as having slopes from 15 - 50 percent. The western boundary of the site contains steep slopes mapped as over 50 percent, and which are mapped as areas of historic landslides. These areas are heavily wooded and are not usable. As a condition of approval, the graded areas and structures shall be reviewed by the County Building Division and will be reviewed for consistency with applicable State and local regulations of building standards, including those addressing slope stability, ground shaking, and geologic risks.</p>
<p>Safety Element Chapter 14</p> <p>Flooding</p>	<p>Goals and policies contained in this Chapter relate to the use of natural drainage channels and watersheds that are managed to minimize peak flows in order to reduce the severity and frequency of flooding. (S-G3)</p> <p>Related policies include: S-P12, Federal Flood Insurance Program; S-P13, Flood Plains; S-P15, Construction Within Special Flood Hazard Areas</p>	<p>The subject site, according to Flood Insurance Rate Map (FIRM) Panel No. 06023C1875F, is in an area of minimal flooding hazard. The project site is not within a mapped dam or levee inundation area and is outside the areas subject to tsunami run-up.</p>
<p>Safety Element Chapter 14</p> <p>Fire Hazards</p>	<p>Goals and policies of this Chapter encourage development designed to reduce the risk of structural and wildland fires supported by fire protection services that minimize the potential.</p> <p>Related policies: S-P15, Conformance with State Responsibility Areas (SRA) Fire Safe Regulations.</p>	<p>The subject parcel is located within an area with a high fire rating and a very high fire severity rating. The subject property is located within the Garberville Fire Protection District response area and within the State Responsibility Area (SRA) where the State of California has the primary financial responsibility for the prevention and suppression of wildland fires. Cal Fire recommends compliance with the requirements of the County's Fire Safe Regulations. The Humboldt County Fire Safe Ordinance (Section 3111-1 et seq.) establishes development standards for minimizing wildfire danger in SRAs. The applicant disclosed that total water storage is 12,750 gallons [existing tanks: four 2,500-gallon tanks, one 750-gallon tank, two 1,000-gallon tanks] with an additional 2,500-gallon tank and approximately 70,000 gallons of pond storage being proposed. Estimated annual water use is 88,640 gallons, which will provide fire protection in addition to cultivation needs.</p>

Plan Section	Summary of Applicable Goal, Policy, or Standard	Evidence Which Supports Making the General Plan Conformance Finding
		According to the applicant, during the peak season, the operation will employ 8 to 10 employees who will live off-site. Two of the employees (the applicants) will live on the property seasonally.
Community Infrastructure and Services Element, Chapter 5  Implementation Action Plan	IS-S5 requires new industrial, commercial and residential development located outside of fire district boundaries to obtain written acknowledgment of available emergency response and fire suppression services from the local fire agency, including any recommended mitigation.	To implement this policy, conditions of approval for the proposed project required the applicant to contact the local fire service provider [Garberville Fire Protection District] and furnish written documentation from that agency of the available emergency response and fire suppression services and any recommended project mitigation measures. If emergency response and fire suppression services are not provided, the applicant shall cause to be recorded an "ACKNOWLEDGMENT OF NO AVAILABLE EMERGENCY RESPONSE AND FIRE SUPPRESSION SERVICES" for the parcel(s) on a form provided by the Humboldt County Planning Division.
Air Quality Chapter 15	Goals and policies contained in this Chapter relate to improved air quality to meet current and future state and federal standards, including attainment of particulate matter requirements (AQ-G1, AQ-G2, AQ-G3) and the successful reduction of greenhouse gas emissions to levels consistent with state and federal requirements. (AQ-G3)  Related policies: AQ-P4, Construction and Grading Dust Control, AQ-S1. Construction and Grading Dust Control, AQ-P7. Interagency Coordination.	As a condition of project approval, applications for grading and/or building permits shall be referred to the North Coast Air Quality Management District (NCAQMD) for review and consultation. Dust control practices during construction and grading shall achieve compliance with NCAQMD fugitive dust emission standards.

**2. Zoning Compliance and 3. Conforms with applicable standards and requirements of these regulations:**  
The following table identifies the evidence which supports finding that the proposed development is in conformance with all applicable policies and standards in the Humboldt County Zoning Regulations.

Zoning Section	Summary of Applicable Requirement	Evidence That Supports the Zoning Finding
§312-1.1.2  Legal Lot Requirement	Development permits shall be issued only for a lot that was created in compliance with all applicable state and local subdivision regulations.	The parcel of land known as APN 223-132-001 is Parcel 4 of Parcel Map No. 1042 filed on May 23, 1977, recorded in Book 9 of Parcel Maps pages 57, 58, and 59. There is no evidence indicating any subsequent acts to merge or divide this parcel. Therefore, the subject parcel was lawfully created in its current configuration and can be developed as proposed.



Zoning Section	Summary of Applicable Requirement	Evidence That Supports the Zoning Finding
§314-8.1 Unclassified	<b>Unclassified (U):</b> Intended to be applied in areas in which general agriculture, one-family dwelling, rooming and boarding of not more than two (2) persons, and manufactured home are desirable predominant uses.	The applicant is seeking a Conditional Use Permit for an existing 13,884-square-foot cannabis cultivation operation with 6,300 square feet of outdoor production and 7,584 square feet of mixed-light production on a property zoned U. The proposed use is specifically allowed with a Conditional Use Permit in this zoning district and under Section 314-55.4.8.2.2 of the CMMLUO.
Minimum Lot Size	6,000 square feet	76.88 acres
Maximum Ground Coverage	40 percent	<1 percent
Minimum Lot Width	50 feet	2,282 feet
Maximum Lot Depth	100 feet	1,993 feet
Minimum Yard Setbacks:  (Through the SRA requirements)	Front: 20 feet  Rear: 10 feet  Side: 5 feet  SRA: 30 feet, all sides	Front: >30 feet  Rear: >30 feet  Side: >30 feet
Max. Building Height	None specified	<50 feet
§314-61.1 Streamside Management Area (SMA)	Purpose: to provide minimum standards pertaining to the use and development of land located within Streamside Management Areas (SMAs) and other wet areas (OWA) to implement the County's Open Space Element of the General Plan.	The proposed project does not involve any development within the Streamside Management Area for Dean Creek. Water for irrigation uses is a rain catchment system that collects rainwater from roof structures and road ditch run-off. Water for domestic uses is supplied through a point of diversion located on an unnamed creek on the subject parcel. The applicant obtained a Final Lake and Streambed Alteration Agreement (LSAA, Notification #1600-2016-0158-R1) from the California Department of Fish and Wildlife for the point of diversion and improvements related to the water storage pond. The applicant has filed a Small Domestic Use Registration (SDUR) for the domestic use surface water diversion. Conditions of approval require the applicant to obtain appropriate water rights for the water stored for domestic use from the State Water Resources Control Board.

Zoning Section	Summary of Applicable Requirement	Evidence That Supports the Zoning Finding
§314-109.1.2.9  Off-Street Parking  Parking Spaces for the Uses Not Specified	Off Street Parking for Agricultural use*: One parking space per employee at peak shift. A minimum of two parking spaces are required.  *Use for this activity is not specified. Per Section 314-109.1.2.9, the Director may fix the required number of parking spaces based on standards for most comparable use.	10 spaces

**314-55.4 et seq. HCC: Commercial Cultivation, Processing, Manufacturing and Distribution of Cannabis for Medical Use Inland Land Use Regulation (CMMLUO)**

§314-55.4.8.2	Commercial cannabis cultivation is allowed on parcels zoned U, that are one acre or larger and have been designated in the General Plan for agricultural development. In all zones where cultivation is allowed consisting of timberland, the commercial cultivation of cannabis for medical use shall only be permitted within a 3-acre conversion exemption area, or non-timberland open area.	The project site features existing cultivation operations in cleared areas of a forested parcel zoned Unclassified. Referral comments from CAL FIRE dated September 4, 2017, state that there appears to have been timber conversion on the subject parcel. As directed by CAL FIRE, the applicant has a Less-Than-Three-Acre Mitigation Plan prepared by Mad River Properties, Inc. The report identified 4 sites with conversion totaling 1.98 acres; Site A was cleared in 1998 and expanded in 2011, while the other three sites (Sites B – D) were cleared in 2012. The report identified 11 road points that require improvements, including replacement of 3 culverts, monitoring of other culverts, recontouring of slopes and installation of rocked rolling dips. The report was re-referred to CAL FIRE on August 1, 2018, and no additional comments regarding this project were received. Conditions of approval require the applicant to adhere to the recommendations made in the Mad River Properties, Inc. Nate Chevalier Less Than Three Acre Conversion Mitigation Plan dated December 11, 2017. Conditions of approval also require the applicant to notify the California Department of Fish and Wildlife regarding the culvert replacements recommended in the report.
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<p>§314-55.4.8.2.2</p> <p>Existing Outdoor and Mixed-Light Cultivation</p>	<p>A Zoning Clearance Certificate, Special Permit or Use Permit may be issued for outdoor or mixed-light commercial cannabis cultivation for some or all of the cultivation area in existence prior to January 1, 2016, in zoning districts U (on parcels one acre or larger), but only when possible to bring the cultivation into compliance with all applicable standards set forth in this section and to eliminate existing violations as specified in this ordinance. The total cultivation area allowed on a single parcel shall not exceed one acre for outdoor cultivation or 22,000 square feet for mixed light cultivation. No expansion of the existing cultivation area shall be permitted.</p>	<p>The proposed action is a Conditional Use Permit for 6,300 square feet of existing outdoor cultivation and 7,884 square feet of mixed light cultivation on APN 223-132-001, which is a 76-acre parcel zoned U. Aerial imagery on Google Earth indicate that the existing cultivation areas were present on the subject parcel prior to 2015. The cultivation area, type, status, and zoning of the parcel are consistent with the requirements for a Conditional Use Permit. The applicant will comply with all conditions of the CMMLUO, as specified in the recommended conditions of approval.</p>
<p>§314-55.4.8.10</p> <p>Permit Limit</p>	<p>No more than four commercial cannabis activity permits may be issued to a single person, as defined in the referenced section.</p>	<p>According to records maintained by the Department, Pure Nature, LLC, applicant holds no other cannabis activity permits, and is entitled to four. This application is for one permit.</p>
<p>§314-55.4.9.1</p> <p>Accessory Processing</p>	<p>Processing for cultivation requiring a Special Permit or Use Permit will be considered in the Use Permit application.</p>	<p>All cannabis cultivated will be processed on-site in a proposed 800-square-foot processing facility per the Conditional Use Permit. No cannabis cultivation off-site will be transported to this location.</p>
<p>§314-55.4.9.4</p> <p>Pre-Application Registration</p>	<p>Existing cultivation sites shall register with the County within 180 days of the effective date of this ordinance.</p>	<p>A Commercial Cannabis Registration Form for the project site, APN 223-132-001, was filed with the Planning Division on June 29, 2016, and within the specified window.</p>
<p>§314-55.4.10</p> <p>Application Requirements</p>	<p>Identifies the information required for all applications.</p>	<p>Attachment 3 identifies the information submitted with the application and shows that all the required information was received.</p>
<p>§314-55.4.11</p> <p>Performance Standards</p>	<p>Identifies the performance standards for cannabis cultivation activities.</p>	<p>All the applicable performance standards are included as conditions of project approval. They are required to be met throughout the time frame of the permit.</p>

<p>§314-55.4.11.c Performance Standards – Water</p>	<p>Compliance with all statutes, regulations, and requirements of the California State Water Resources Control Board, Division of Water Rights, at a minimum to include a statement of diversion of surface water from a stream, river, underground stream, or other watercourse required by Water Code Section 5101, or other applicable permit, license, or registration.</p>	<p>Water for irrigation use is sourced entirely from rainwater catchment that captures run-off from roof structures and road drainages while water for domestic purposes is sources from a permitted point of diversion on-site. Estimated annual water use for irrigation is 88,640 gallons. Total water storage is 12,750 gallons [existing tanks: four 2,500-gallon tanks, one 750-gallon tank, two 1,000-gallon tanks] with an additional 2,500-gallon tank and approximately 70,000 gallons of pond storage being proposed. The applicant has filed with the Regional Water Board as a Tier II Discharger. The applicant obtained a Final Lake and Streambed Alteration Agreement (LSAA, Notification #1600-2016-0158-R1) from the California Department of Fish and Wildlife for the point of diversion and improvements related to the water storage pond. The applicant has filed a Small Domestic Use Registration (SDUR) for the domestic use surface water diversion. Conditions of approval require the applicant to obtain appropriative water rights for the water stored for domestic use from the State Water Resources Control Board.</p>
<p>§314-55.4.11.d Performance Standards – Setbacks</p>	<p>The area of cannabis cultivation and on-site processing 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, public park, or tribal cultural resources (TCRs).</p>	<p>The applicant's site plan shows that the cultivation area conforms to the performance standards for setbacks. There are no public parks, schools, school bus stop, church, or other place of religious worship, or any known tribal cultural resources, as defined in HCC Section 314- 55.4.7 within 600 feet of the cultivation site based on a review of aerial imagery, nor is there a place of religious worship within 600 feet.</p>
<p>§314-55.4.11.o Performance Standards – Generator Noise</p>	<p>The noise produced by a generator used for cannabis cultivation shall not be audible by humans from neighboring residences. The combined decibel level for all noise sources, including generators, at the property line shall be no more than 60 decibels. Where applicable, sound levels must also show that they will not result in the harassment of marbled murrelet or spotted owl species, when generator use is to occur in the vicinity of potential habitat. Conformance will be evaluated using current auditory disturbance guidance prepared by the US Fish and Wildlife Service.</p>	<p>Power source will be provided by two generators. The applicant is working with P. G. &amp; E. to have conventional grid power brought to the subject parcel. Noise generated from the generators shall comply with the standards set forth in Section 55.4.11(o) of the CMMLUO which requires the combined decibel level for all noise sources to be no more than 60 decibels at the property line. Therefore, the project conforms with the referenced standard.</p>

§314-55.4.17 Sunset Date	No application for any Use Permit pursuant to the CMMLUO shall be processed for issuance or approval that is received after December 31, 2016.	The applicant filed the application on August 3, 2016.
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**4. Public Health, Safety and Welfare.** The following table identifies the evidence which supports finding that the proposed location of the use and 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.

Code Section	Summary of Applicable Requirement	Evidence that Supports the Required Finding
§ 312-17.1.4 Required Findings	The proposed development will not be detrimental to the public health, safety, and welfare, and will not be materially injurious to properties or improvements in the vicinity.	The Department finds that the proposed project would not be detrimental to the public health, safety, and welfare since no reviewing referral agencies have recommended denial of the proposed project and the commercial cannabis operation would be conducted in accordance with the properties or performance standards set forth in the CMMLUO. The project as proposed and conditioned is consistent with the general plan and zoning ordinances; and the proposed project is not expected to cause any environmental damage.

**5. Residential Density Target:** The following table identifies the evidence which supports finding that the proposed project will not reduce the residential density for any parcel below that is utilized by the Department of Housing and Community Development in determining compliance with housing element law.

Code Section	Summary of Applicable Requirement	Evidence that Supports the Required Finding
§ 312-17.1.5 Housing Element Densities	The proposed development shall not reduce the residential density for any parcel below that is utilized by the Department of Housing and Community Development in determining compliance with the housing element.	The project site is not located within a Housing Opportunity Zone, as defined by the 2014 Housing Element. Additionally, the project would not reduce the residential density for any parcel. No residences exist onsite and the property would continue to operate within the property's established density of one dwelling unit per 20 to 160 acres.

**6. Environmental Impact:** The following table identifies the evidence which supports finding that the proposed development will not adversely impact the environment.

Code Section	Summary of Applicable Requirements	Evidence that Supports the Required Finding
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<p>§§15301, 15303 and 15304 of CEQA Guidelines</p>	<p>Categorically exempt from State environmental review.</p>	<p>Environmental review for the proposed project was conducted, and based on the results of that analysis, staff believes the existing cultivation and processing aspects of the project are Categorically Exempt from the provisions of the California Environmental Quality Act (CEQA) because they can be considered to be an "Existing Facility" per Section 15301, the processing facility would be considered "New Construction or Conversion of a Small Structure" as defined by Section 15303, and grading associated with project improvements would be a "Minor Alteration to Land" as defined by Section 15304 because it would involve "minor public or private alterations in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees except for forestry or agricultural purposes."</p>
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## ATTACHMENT 3

### Applicant's Evidence in Support of the Required Findings

Attachment 3 includes a listing of all written evidence which has been submitted by the applicant in support of making the required findings. The following materials are on file with the Planning Division:

1. The name, contact address, and phone number(s) of the applicant. (Application form on file)
2. If the applicant is not the record title owner of parcel, written consent of the owner for the application with original signature and notary acknowledgement. (On file)
3. Site plan showing the entire parcel, including easements, streams, springs, ponds, and other surface water features, and the location and area for cultivation on the parcel with dimensions of the area for cultivation and setbacks from property lines. The site plan shall also include all areas of ground disturbance or surface water disturbance associated with cultivation activities, including access roads, water diversions, culverts, ponds, dams, graded flats, and other related features. If the area for cultivation is within one-quarter mile (1,320 feet) of a school, school bus stop, church or other place of religious worship, public park, or tribal cultural resources, the site plan shall include dimensions showing that the distance from the location of such features to the nearest point of the cultivation area is at least 600 feet. (Attached)
4. A cultivation and operations plan that meets or exceeds minimum legal standards for water storage, conservation, and use; drainage, runoff, and erosion control; watershed and habitat protection; proper storage of fertilizers, pesticides, and other regulated products to be used on the parcel; and a description of cultivation activities (outdoor, indoor, mixed-light), the approximate date(s) cannabis cultivation activities have been conducted on the parcel prior to the effective date of this ordinance, if applicable, and schedule of activities during each month of the growing and harvesting season. (On file)
5. Copy of the statement of water diversion, or other permit, license, or registration filed with the State Water Resources Control Board, Division of Water Rights, if applicable. (On file)
6. Description of water source, storage, irrigation plan, and projected water usage. (On file)
7. Copy of Notice of Intent and Monitoring Self-Certification and other documents filed with the North Coast Regional Water Quality Control Board demonstrating enrollment in Tier 1, 2, or 3, North Coast Regional Water Quality Control Board Order No. 2015-0023, or any substantially equivalent rule that may be subsequently adopted by the County of Humboldt or other responsible agency. (On file)
8. If any on-site or off-site component of the cultivation facility, including access roads, water supply, grading, or terracing, impacts the bed or bank of any stream or other watercourse, a copy of the Streambed Alteration Permit obtained from the California Department of Fish and Wildlife. (On file)
9. If the source of water is a well, a copy of the County well permit, if available. (Not applicable)
10. If the parcel is zoned FR, U, or TPZ, or involves the conversion of timberland as defined under Section 4526 of the Public Resources Code, a copy of a less-than-3-acre conversion exemption or timberland conversion permit, approved by the California Department of Forestry and Fire Protection (Cal Fire). Alternately, for existing operations occupying sites created through prior unauthorized conversion of timberland, evidence may be provided showing that the landowner has completed a civil or criminal process and/or entered into a negotiated settlement with Cal Fire. (On file)

11. Consent for on-site inspection of the parcel by County officials at a prearranged date and time in consultation with the applicant prior to issuance of any clearance or permit, and once annually thereafter. (On file)
12. For indoor cultivation facilities, identify the source of electrical power and how it will meet with the energy requirements in Section 55.4.8.2.3 of the Zoning Code, and plan for compliance with applicable building codes. (Not applicable)
13. Acknowledge that the County reserves the right to reduce the size of the area allowed for cultivation under any clearance or permit issued in accordance with this section in the event that environmental conditions, such as a sustained drought or low flows in the watershed, will not support diversions for irrigation. (On file)
14. Acknowledge that the County reserves the right to engage with local tribes before consenting to the issuance of any clearance or permit, if cultivation operations occur within an Area of Traditional Tribal Cultural Affiliation, as defined herein. This process will follow current departmental referral protocol, including engagement with the tribe(s) through coordination with their Tribal Historic Preservation Officer (THPO) or other tribal representatives. This procedure shall be conducted similar to the protocols outlined under Senate Bill 18 (Burton) and Assembly Bill 52 (Gatto), which describe "government-to-government" consultation, through tribal and local government officials and their designees. During this process, the tribe may request that operations associated with the clearance or permit be designed to avoid, minimize, or mitigate impacts to tribal cultural resources, as defined herein. Examples include, but are not limited to, conducting a site visit with the THPO or their designee to the existing or proposed cultivation site, requiring that a professional cultural resources survey be performed, or requiring that a tribal cultural monitor be retained during project-related ground disturbance within areas of sensitivity or concern. The County shall request that a records search be performed through the California Historical Resources Information System (CHRIS). (On file)
15. DEH Attachment for Commercial Medical Marijuana Clearances/Permits received May 30, 2017. (On file)
16. Water Resources Protection Plan. (On file)
17. Road Evaluation Reports dated February 27, 2018. (Attached)
18. Lake or Streambed Alteration Agreement (Notification #1600-2016-0158-R1) (CDFW). (Attached)
19. Nate Chevalier Less than 3 Acre Conversion Mitigation Plan prepared by Mad River Properties, Inc. dated December 11, 2017. (On file)
20. Addendum to the Operations Plan dated October 2, 2018. (Attached)





**PURE NATURE  
CULTIVATION AND OPERATIONS MANUAL  
HUMBOLDT COUNTY, CA**

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**PROPOSED MEDICAL CANNABIS  
CULTIVATION FACILITIES**

**PREPARED FOR:**



**March 2017**

**Cultivation and Operations Manual  
For  
Pure Nature**

**Proposed Medical Cannabis Cultivation Facilities**

Lead Agency:

***Humboldt County Planning Department***  
3015 H Street  
Eureka, CA 95501

Prepared By:

***Manhard Consulting***  
517 3rd Street, Suite 6  
Eureka, California 95501

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February 2017

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## 1. PROJECT SUMMARY

### 1.1. PROJECT OBJECTIVE

Pure Nature is proposing to permit existing medical cannabis cultivation activities in accordance with the County of Humboldt's (County) *Commercial Medical Marijuana Land Use Ordinance* (CMMLUO), Ordinance No. 2544. Pure Nature, LLC, has applied for a Conditional Use Permit for approximately 6,800 square feet (sf) of mixed light with two runs of medical cannabis cultivation and approximately 6,300 sf of outdoor cultivation. The project includes the permitting of existing and proposed facilities appurtenant to the cultivation, including greenhouses, water diversion works, and a cultivation facility for drying, curing, grading and trimming of medical cannabis.

### 1.2. SITE DESCRIPTION

The Project is located at 444 Drew Drive, outside of Garberville (APN 223-132-001). The subject parcel is approximately 78 acres in size (per the County of Humboldt's WebGIS), having moderately steep to extremely steep terrain of slopes from greater than 15% gradient in areas to greater than 40% gradient in areas (see attached Humboldt WebGIS map). The majority of the property is primarily fir forest, mixed with madrone and tan oak, with Dean Creek running east to west through the property. A permitted single family residence, approximately 1,400 square feet in size exists on the property, and agriculture exempt permitted structures accessory to activities also exist on the property. The project proposes the conversion of a storage structure to a dwelling unit as well as the design and implementation of an additional cultivation facility in subsequent years. 6,300 sf of the existing outdoor cultivation is planted above ground in 200 gallon pots. 6,800 sf of existing outdoor cultivation is located in light duty greenhouse structures. The proposed 1,310 sf of nursery will be located in a greenhouse.

### 1.3. LAND USE

The subject property is located outside of the Coastal Zone, has a Humboldt County General Plan designation of Agricultural Lands (AL40; AG-FRWK), and is zoned Unclassified (U). The property contains no prime farmland according the Humboldt County WebGIS. Land uses surrounding the parcel are comprised of agriculture lands and agriculture grazing. The surrounding parcels are zoned Agricultural Exclusive (AE), Timber Production Zone (TPZ), and Unclassified (U).

### 1.4. STATE AND LOCAL COMPLIANCE

#### 1.4.1. STATE OF CALIFORNIA COMMERCIAL CANNABIS ACTIVITY LICENSE

Pure Nature, LLC. will obtain a Commercial Cannabis Activity license from the State of California at the time such a license becomes available.

#### 1.4.2. NORTH COAST REGIONAL WATER QUALITY CONTROL BOARD

Effective March 3, 2016, Pure Nature, enrolled with the North Coast Regional Water Quality Control Board (NCRWQCB) for coverage under Tier 2 of Order No. 2015-0023 *Waiver of Waste Discharge Requirements and General Water Quality Certification for Discharges of Waste Resulting from Cannabis Cultivation and Associated Activities or Operations with Similar Environmental Effects in the North Coast Region* (WDID Number 1B16208CHUM). A Water Resources Protection Plan (WRPP) has been developed and is currently being implemented for activities associated with onsite cultivation.

7,584  
6,300  

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13,884  
Total cult.  
area  
(see site  
plan for  
add'l  
details)

**1.4.3. HUMBOLDT COUNTY BUILDING DEPARTMENT**

All necessary building permits will be obtained from the Humboldt County Building Department for all proposed structures and supporting infrastructure upon approval of the Conditional Use Permit. Existing structures have permits already completed.

**1.4.4. CAL FIRE**

The subject property is located within a State Responsibility Area (SRA) for fire protection. All structures on the property meet the 30-foot SRA setback requirement from property lines. Structures included in Permit 12-918-AOB-3 specified and meet SRA requirements. This includes a fire turn-around, pull-out area for emergency vehicles, and additional water storage for fire suppression. Trees and vegetation will also be managed around existing structures to maintain the required 100-foot defensible space.

**1.4.5. CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE**

A Lake and Streambed Alteration Agreement (LSAA) from DFW has been obtained for two encroachments. Water diversion from a Class II spring for domestic use. Construction of a water impoundment structure and spillway, to provide water for irrigation and reduce water use during the low flow summer season. The final LSAA agreement was received June 29, 2016 (Notification No. 1600-2016-0058-R1).

**2. ENVIRONMENT**

**2.1. WATER SUPPLY AND WATER USE**

Water for domestic use will be supplied through an existing spring, established by a riparian right (S025272) registered with the Division of Water Rights (DWR). Also pending is a Small Domestic Use Registration (SDUR) (D032577) for a 60-day forbearance period with (DWR). Water from the spring will be used exclusively for domestic purposes, including fire suppression storage and irrigation of a small garden which does not include cannabis.

Water for irrigation of cannabis will be done entirely with rain water catchment. A proposed off stream pond, permitted through Humboldt County Building Department and California Department of Fish & Wildlife, will collect runoff from roof structures and road side drainage, and will distribute water to cultivation area. Refer to section 2.6.2 for a summary of irrigation practices.

**Estimated Annual Irrigation Water Usage (Gallons)**

Jan	Feb	Mar	April	May	June	July	Aug	Sept	Oct	Nov	Dec
0	0	0	0	16,000	19,200	19,200	16,000	14,400	3,840	0	0

The table above outlines the estimated irrigation water usage for Pure Nature during a typical year. Irrigation water usage out will be dependent on weather conditions. Pure Nature commits to meeting any forbearance requirements if the State of California requires use of surface water diversion for medical cannabis cultivation.

**2.2. WATERSHED AND HABITAT PROTECTION**

The project is located within the Dean Creek watershed, a critical tributary to the SF Eel River. that supports downstream habitat to Chinook salmon, Coho salmon and steelhead trout. Other critical species have been identified according the California Natural Diversity Database (CNDDDB). The property is primarily steep terrain with silty gravel among a mixed hardwood forest. Cultivation along with the associated activities and procedures have been reviewed following notification of applicable

agencies. The following agencies have been notified and several have provided terms and conditions to meet their respective environmental standards:

- California Department of Fish and Wildlife (CDFW)
- State Water Resources Control Board (SWRCB), Division of Water Rights
- SWRCB, North Coast Regional Water Quality Control Board (NCRWQCB)
- California Department of Forestry and Fire Protection (Cal Fire)

Some protective measures include various maintenance, erosion control and drainage features. Upper section of main road needs to be out sloped, rocked and rolling dips installed. Installation of additional ditch relief culverts to shorten the inboard ditch length and mitigate hillslope erosion. The lower road and North road need to be out sloped, rocked and rolling dips installed also.

Final terms and conditions have been obtained from CDFW and the NCRWQCB which covers water diversion, sediment discharge, and fertilization discharge into surrounding riparian water sources. The terms and conditions issued by these agencies are considered comprehensive for cultivation practices. The terms and conditions limit water diversion to specified periods in order to maintain instream flows and stream temperatures during summer months. In addition, containment, consumption rates, and discharge control of inherent fertilizers, as well as sediment and erosion control methods are specified in the attached Water Resources Protection Plan (WRPP).

### **2.3. USE AND STORAGE OF REGULATED PRODUCTS**

The State of California Agricultural Department as well as the Humboldt County Agricultural Department recognize the need for use of pesticides and fungicides. Pure Nature will employ best management practices when storing, handling, mixing, application and disposal of all pesticides/fungicides. Pure Nature will also engage in the use of pesticides and fungicides that have been approved by either the state of California Agricultural Department or the Humboldt County Agricultural Department or by any Humboldt County Ordinance or State of California Initiative.

Pure Nature will follow required regulations in the storing, handling, mixing, application and disposal of all pesticides. The Agent In Charge will hold a State of California Agricultural Department Private Pesticide Applicators License issued through the Humboldt County Agricultural Department. Training of employees in the storing, handling, mixing, application, disposal and emergency spill containment and clean up procedure will be sole responsibility of the Lead Cultivator as the holder of the Private Pesticide Applicators License.

All nutrients, pesticides and fungicides will be stored in water tight, locked and labeled housing in accordance with manufactures instruction. Pure Nature will provide all employees trained to handle, mix, apply or dispose of pesticides/fungicides with proper hand, eye body and respiratory protection in accordance with State of California Agricultural Department Private Pesticide Applicators License as well as manufacturer's recommendations. In addition, at any place where pesticide/fungicide to be stored, handled, mixed, applied or disposed, Pure Nature will provide saline eye wash stations and emergency containment and clean up kits as prescribed in the State of California Agricultural Department Pesticide Applicators License handbook as well as manufacture labeling directions. (see Appendix D - *Pesticide Storage, Handling and Application Plan* and Appendix E *Water Resources Protection Plan* for detailed descriptions of practices). Nutrients and amendments used include Azomite: Micronized, Baseline granular and liquid compost, Down to Earth: Bio Fish, Down to Earth: Crab Meal, Dr. Earth Bud and Bloom Booster, Sparetime Supply: Mocha Bat Guano, Sparetime Supply: Molasses, Sparetime Supply: Soluable Kelp Powder, Stutzmans Chicken Manure, Ultra-Fine Ag Gypsum, BLC: Forest Fungal Compost, BLC: Earthworm Castings BLC: Fish Fusion, BLC: Bokashi, BLC: Frass, BLC: Microbe Fire, and BLC Microbe Zen. Liquid fertilizers have been placed in bins, or other

container for secondary containment. Pesticides/ Herbicides used include Azatrol Hydro Botanical Insecticide, Actinovate, Companion, Met 52, Regalia, Safe Garden Fungicide, SaferGro Pest out and Venerate. These products will be stored in the enclosed metal building along with the fertilizers and soil amendments.

Gasoline and other chemicals are stored in the metal building with secondary containment. There are two small generators for backup power. The site uses solar power currently for operations and is in process of an electric connection with PG&E.

Propane fuel is stored in a 500-gallon tank which is properly anchored and secured. Propane is used for cooking and heat within the home.

Pure Nature will enroll with the Humboldt County Environmental Health Department (HCEHD) as the Certified Unified Program Agency and will comply with HCEHD's inventory reporting and response plan requirements.

A copy of the Operations Plan will be kept on site by the Agent in Charge and will contain all material safety data sheets for all regulated products used on site (MSDS).

## **2.4. WASTE MANAGEMENT PLAN**

### **2.4.1. SOLID WASTE MANAGEMENT**

A trash enclosure with covered waste and recycling bins will be located adjacent to the proposed cultivation facility. Designed to prevent run-off and keep animals out.

A trailer with 4' foot side walls and cover will be utilized for transportation of waste, or equivalent method.

Waste is removed from the property weekly and is transported to Redway transfer station.

Spent soil will be stockpiled on the North landing in a depressed stockpile area to prevent erosion and will be amended and re-used the following season. Vegetation matter such as branches and leaves will be processed through a brush shredder and composted. Root balls will be burned at a designated area.

### **2.4.2. WASTEWATER MANAGEMENT**

There is currently an existing and permitted septic system for the existing two-bedroom residence. The primary and reserve field design consists of (5) 68-foot trenches. The required length of line 320- foot to treat the effluent for the originally proposed five- bedroom residence.

On-site wastewater treatment will continue to be provided in the form of septic systems for the existing two-bedroom residence and the proposed processing building.

The septic system for the processing building will be designed to accommodate a peak count of 8 or less employees which occurs during the processing season. During the rest of the year, there will be a peak of 2 employees.

Restroom access will be available for all employees at the proposed processing building which will be located less than 200 feet from the majority of the proposed cultivation areas.

## **2.5. EMPLOYMENT PLAN**

### **2.5.1. ALATORRE-ZENOVICH-DUNLAP-BERMAN AGRICULTURAL LABOR RELATIONS ACT STATEMENT**

Pure Nature 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.



### 2.5.2. CALIFORNIA AGRICULTURAL EMPLOYER COMPLIANCE

Pure Nature will comply with all applicable federal, state and local laws and regulations governing California Agricultural Employers.

### 2.5.3. JOB DESCRIPTIONS AND EMPLOYEE SUMMARY

- *Agent in Charge*: Responsible for business oversight and management of Pure Nature, LLC. 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 full-time, year-round position.
- *Lead Cultivator*: Oversight and management of the day to day cultivation of medical 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.
- *Seasonal Labor*: This position is temporary and employee count will vary based on the needs of the farm during the cultivation, harvest and processing seasons.

The *Agent in Charge* is a principal for the Pure Nature, LLC. In addition to the *Agent in Charge* and *Lead Cultivator*, Pure Nature intends to employ up to eight (8) seasonal labor positions for an estimated total of approximately ten (10) employees maximum at the Project site at any given time. A peak of 2 employees during the cultivation season and a peak of 10 employees during the harvest and processing seasons are expected.

All Pure Nature's seasonal employees will be required to wear a Pure Nature -issued photo ID badge on a lanyard at all times while working at the cultivation site. They will be required to read the Pure Nature Operating Manual along with the Pure Nature Employee Handbook. They will also be required to sign and date a form acknowledging they have read and understand its contents (see Attachment A – *Personnel Acknowledgement Form*).

The *Agent in Charge* will meet with the *Lead Cultivator* daily to discuss any pending internal issues relating to day to day operations as well as discuss any upcoming schedule needs. Each department will give a daily synopsis related to their particular tasks. This will include a daily plant count inventory, a daily fertilizer application summary, a daily pesticide application summary a daily water use summary and a daily inventory of processing and packaging as well as product packaged for distribution. The *Lead Cultivator* will maintain daily contact with the *Agent in Charge* to keep the *Agent in Charge* abreast of any issues that occur pertaining to cultivation, inventory, non-security related employee issues and facility compliance needs. It is the intention of the *Agent in Charge* to maintain a transparent communication at all times, to ensure the uninterrupted flow of medical cannabis remains compliant and within the code of conduct.

The *Agent in Charge* will monitor the entire facility daily to ensure all medical cannabis from freshly cut clone to packaging for sale is tracked, accounted for and inventoried in real time. In addition, weekly physical inventory will be taken by each department to ensure all inventory logs are accurate. Cultivation inventory is tracked via in-house recording (until such time as a seed to sale program is introduced via county or state regulation) from explants (new plant cutting) to harvest and sale and will be recorded to the Master Log every 24 hours. The Master Log will be made available upon the request of any County or State official deemed by his or her agency to have authority to view it. Harvested packaged ready for retail medical cannabis will be monitored and inventoried via the Master Log (until such time as a seed to sale program is introduced via county or state regulation). This will include the plant number, the site number, the date it was planted, the date it was harvested

as well as other pertinent information outlined in the *In-house Seed to Sale Master Log Description* section of this manual.

By having designated duties and procedures in place for each job title, Pure Nature can efficiently manage the work flow and chain of custody for the product as well as identify and address problems as they arise.

#### **2.5.4. EMPLOYEE SAFETY PRACTICES**

All part time seasonal employees will be trained on proper safety procedure. This training will include but not be limited to: fire safety, proper harvesting techniques, use of harvesting equipment, use of rubber gloves and respirators, use and cleaning of trimming machines per manufactures direction, proper hand washing guidelines and an Emergency Procedures Plan in case of emergency. 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 in a conspicuous place. Pure Nature will provide rubber gloves and respirators or dust masks to all employees. Pure Nature will provide Saline Eye Wash Stations at strategic places inside the Processing Facility. Pure Nature will also provide each Employee with a written copy of emergency procedures and contact information (see Appendix D – Emergency Procedures and Contact Information). A copy of the Operations Plan will be kept on site by the Agent in Charge and will contain all material safety data sheets (MSDS), see Appendix F.

### **2.6. CULTIVATION PLAN**

#### **2.6.1. PLANTING METHODS AND MEDIUMS**

The mixed light cultivation will occur in four (4) greenhouses totaling 6,800 square feet. The greenhouses utilize a combination of artificial light and light deprivation to produce up to two (2) flowering cycles per year. The outdoor cultivation will occur outdoor totaling 3,100 square feet and in two (2) outdoor unlighted greenhouses totaling 3,200 square feet. The outdoor cultivation area is expected to produce one (1) flowering cycle per year.

The cultivation facilities will utilize established and proven cultivation techniques shown to be effective for the commercial cultivation of medical cannabis species. The plants will be cultivated outdoors in 200 gallon geopots and in raised beds within cold frame greenhouses (see Attachment C – *Site Plans, Floor Plans and Elevations*). The cold frames will consist of heavy gauge steel tubing, covered with a woven poly translucent opaque tarp. Each cold frame will be ventilated by intake and exhaust fans as well as roll up side panels. Cold frames and solar power systems will be installed per the 2016 current California Building Code. The cold frames will contain raised beds. These methods will run independently of each other. Using this methodology, Pure Nature will be able to create an advantageous environment for flowering.

Pure Nature will use black out tarps for mitigation of mixed light use in excess of daylight hours, and during certain times of the year in order to maintain a twelve (12) hour light-to-dark period. This method of cultivating is commonly known as ‘light deprivation’. By manipulating the amount of light the medical cannabis plants are receiving, Pure Nature will force flowering even during the elongated daylight hours of summer months. This cultivation method makes the most economical use of our stored water supply as the life cycle of each plant will be reduced. In turn, more frequent but smaller harvests will occur. The mixed light cultivation will produce two (2) flowering cycles per year.

Pure Nature will propagate and grow on site from clone and seed.

Final Planting will be done in raised beds within the mixed light and outdoor greenhouses and in 200 gallon geopots in the outdoor cultivation area. Raised beds will measure the length of the greenhouse

by fifteen feet width by thirty-six inches in height. Each cold frame structure will house two raised beds. The beds will be constructed in such a way as to allow drainage from the bottom. Each bed will be filled with an organic, nutrient-rich proprietary soil formula. A complete list of base soil and amendments will be recorded in the Lead Cultivators Handbook. All soil and amendments, MSDS for each applicable amendment will be recorded in the Lead Cultivators Handbook. The total amount of plants per bed is dependent upon the cultivar and run length.

#### 2.6.2. IRRIGATION AND FERTILIZATION PRACTICES

Pure Nature will implement water resource management strategies designed in consultation with a local engineering firm to address water needs for the commercial medical cannabis activities described within this cultivation and operations manual. This plan may include but not be limited to:

- Annual forbearance as determined by a *Water Availability Analysis*
- Obtaining a Lake or Streambed Alteration Agreement for the water diversion works and storage through the Department of Fish and Wildlife (DFW)
- Enrollment in the North Coast Regional Water Quality Control Board's (NCRWQCB) Cannabis Cultivation Discharge Program (Order #R1-2015-00230, which includes preparation of a Water Resources Protection Plan (WRPP).

Water for the Project (agricultural irrigation) will be from a rain catchment system. Water for the site (domestic use) is drawn from spring and routed to storage tanks. The source of the water and the associated water rights and permits will be dependent on the requirements of the State of California. An appropriative right for irrigation will be obtained from the State Water Resources Control Board (SWRCB) and an LSAA for the water catchment overflow works. Pure Nature registered with the NCRWQCB as a Tier 2 Cultivation site. Water meters will be installed at the greenhouse to monitor water use for cultivation and reported with the end of year monitoring report.

The *Lead Cultivator* will be solely responsible for the implementation of the irrigation and fertilization program. The *Lead Cultivator* will also provide the necessary training of *Seasonal Labor* and oversee all product handling. All safety, handling and mixing as well as application procedure training will be organized by the *Lead Cultivator* and detailed in the Lead Cultivator Handbook. Annual training sessions will ensure all safety guidelines issued by the manufacturer, Humboldt County Agricultural Department, State of California Agricultural Department and Federal Environmental Protection Agency and Pure Nature are followed. All fertilizers will be stored in water-tight locked housings. These housing will be properly labeled as to denote their contents. All MSDS will be recorded and available for inspection in The Lead Cultivator's Handbook. At all locations fertilizers are to be mixed, applied or stored, Pure Nature will install saline eye wash stations. In addition, Pure Nature will provide any employee with proper hand, eye and body and respiratory protection deemed necessary by manufacture labeling requirements.

A proprietary nutrient solution is prepared as needed by the *Lead Cultivator* and housed in a light-resistant, agricultural grade fertilization holding tank at each site. Each batch solution mixed is then logged into the Master Log. The solution is formulated by manufacturer instructions. All fertilizers and supplements to be used are compliant with all Humboldt County and State of California Department of Agriculture label requirements. MSDS and labels will be available onsite in the Lead Cultivator Handbook.

Irrigation and fertigation of plants will consist of hand watering. Fertilizers and water will be mixed and applied with every watering. The watering cycle for the greenhouses is every 7-10 days in the spring and once every three days during their peak growth rates. Additional hand watering/feeding will be implemented at the direction of the *Lead Cultivator*, as needed.

### 2.6.3. CULTIVATION SCHEDULE

#### *February 1 - May 15: Raising Nursery Stock, Initial Transplant*

All plant samples used in Pure Nature's cultivation sites will be started from seed or composed of clones taken from 'mother' plants. Mother plants are composed of samples that have been deemed to demonstrate superior genetics for desired outcomes. Cuttings, or *clones*, are taken from the mother plants at various intervals. These cuttings are then rooted at the on-site nursery. The *Lead Cultivator* will examine the clones and approve initial planting to begin.

Upon the *Lead Cultivator's* approval, the *Initial Transplant* will commence. The rooted clones will be planted directly into one (1) gallon plastic containers. This point in the cultivation process most often referred to as the 'vegetative' cycle. Due to container and plant size, utilizing a hand watering method is most effective. The *Initial Transplant* phase lasts from one to two weeks depending on the desired outcome. During this phase the adolescent plants are irrigated using hand watering methods and fertilized using our high nitrogen proprietary feeding program. All fertilizers and supplements used are in accordance with Humboldt County and State of California Department of Agriculture compliance. MSDS are recorded into the Lead Cultivator's Handbook. At this point, the pesticide/fungicide management plan is implemented. (see Attachment D - *Pesticide Application and Storage Plan* for pesticide storage, handling, application and disposal procedures)

The plants are then transplanted into 3-gallon plastic containers and the irrigation and fertilizer regime above is repeated.

When the *Lead Cultivator* has determined the plants have achieved desired height and plant growth density for final transplant, the plants are immediately planted into either a raised bed or geopot. Due to the increase in container size and increase in artificial/ daylight hours, the plants will continue to grow in a vegetative state for two to four (2-4) weeks. The approximate desired height and growth density would be three to four feet (3'-4'). During the Final Transplant / Vegetative Phase, the plants are fertilized using our high nitrogen proprietary feeding program. All fertilizers and supplements used are in accordance with Humboldt County and State of California Department of Agriculture compliance. MSDS are recorded into the Lead Cultivators Handbook. Once this desired height and vegetative growth density has been achieved the Light Deprivation Phase begins.

#### *May 1 - July 1: Light Deprivation Phase*

Taking into account factors such as height, growth density and overall health of the plant, the *Lead Cultivator* will determine the exact date for the Light Deprivation process to begin. Once that date is determined, 100% light resistant, tarps will be pulled over the cold frames. This process will reduce the day light hours from approximately fifteen (15) hours of daylight to the desired twelve (12) hours of daylight, twelve (12) hours of darkness desired to induce flowering. During the first two weeks of Light Deprivation, the plants will enter into a transitional phase. During this transitional phase plants will continue vegetative growth while transitioning into flowering. Once the plants enter the budding stage they will be fertilized using a proprietary blend of high phosphorus fertilizers as well as aerobic based supplements. All products used are in compliance with state and federal agricultural guidelines and corresponding MSD and labels are recorded into the Lead Cultivator's Handbook.

It is not uncommon for plants to obtain 25% of their entire height and vegetative growth density during the transitional phase. Once the plants enter in the final bloom or flowering phase, they will begin to expend energy into the production of flowers, therefore, ceasing vegetative growth and begin to flower. The entire flowering process, including the transitional and final bloom phases, will last fifty-five (55) to sixty-five (65) days depending on strain variation and weather conditions.

*July 1-15: First Harvest and Re-Planting*

Once the Light Deprivation Phase has concluded and the *Lead Cultivator* has determined the plants are at their peak, harvest procedures will be initiated (see *Harvesting/Processing Plan* for harvesting and processing procedure). The raised beds will be turned and amended. All amendments used are in accordance with Humboldt County and State of California Department of Agriculture compliance. MSDS are recorded into the Lead Cultivators Handbook. New clones will be transplanted from the Nursery.

Due to the length of artificial/ daylight hours, the plants will continue in a vegetative state for approximately one month. Plants will be planted using the same methodology as with the Initial Transplant Phase. Final Transplant will occur when deemed appropriate by the *Lead Cultivator*, usually seven to 14 days from initial transplant.

*August 14 - November 7: Final Transplant /Natural Flowering Cycle and Harvest Two Phase*

Once the Final Transplant Phase has been initiated by the *Lead Cultivator*, the plants are fertilized with our high nitrogen proprietary feeding program. All fertilizers and supplements used are in accordance with Humboldt County and State of California Department of Agriculture compliance. MSDS are recorded into the Lead Cultivators Handbook.

Due to the natural decline in daylight hours, approximately one (1) month after the Re-Planting Phase has begun the plants will begin to flower naturally. Once the plants enter into the bloom phase they will be fertilized using our proprietary high phosphorus feeding program. All fertilizers and supplements used are in accordance with Humboldt County and State of California Department of Agriculture compliance. MSDS are recorded into the Lead Cultivators Handbook. Once the plants are through the final bloom phase and the lead Cultivator has determined they have reached peak potential, Harvest Two will be initiated (see *Harvesting/Processing Plan* for harvesting and processing procedure).

*November 7 - February 1: Repair, Upgrade and Recondition Phase*

Pure Nature will inspect all cold frames and covers for wear and replace as necessary. The irrigation system will be inspected and repaired or replaced, as appropriate. Refilling of irrigation tanks will commence in accordance with the Small Irrigation Use Registration and conditions of the Department of Fish and Wildlife (DFW) Lake or Streambed Alteration Agreement (LSAA). Winter road and site maintenance will begin in line with procedures outlined in the *Site and Road Maintenance Plan*. The *Agent in Charge* and the *Lead Cultivator* will meet weekly to determine the best action plan for the upcoming season.

**2.6.4. GENERATOR USE PLAN**

Due to the remote location and off the grid nature of the site, it will be necessary for Pure Nature to employ the use of a generator for backup power, plans are in process with PG&E for electric connection. Pure Nature will limit the use of the generator to an as needed basis following all guidelines set up by Humboldt County and the State of California. Two small generators will be used for backup power on site. The generators will be located over one hundred feet from the property line to ensure the noise level will not exceed 60 decibels at the property line. Currently there is a generator to power the existing residence.

**2.6.5. PRODUCT INVENTORY AND TRACKING**

Until such time as either a County or Statewide seed to sale tracking system can be implemented, Pure Nature intends to follow an internally-developed tracking procedure. An inventory of all plants shall be performed by the *Agent in Charge* and *Lead Cultivator* on a daily basis. Batches of plants are

inventoried by logging into record the individual plant tags of each plant located at the base of each plant. This takes into account any plants that have been added to inventory from a permitted medical cannabis nursery and any plants that were removed from inventory or any plants moved to another phase of its lifecycle and any plants that have been destroyed. Any discrepancy in physical plant inventory is traced to the source of the discrepancy, documented. After further investigation, any appropriate corrective measures will be taken.

#### *Intake of Clones from Nursery*

The *Lead Cultivator* oversees the entire cultivation process, from initial intake of clones from the Nursery to final harvest. Well-documented intake procedures ensure that clones procured from the Nursery are taken in, logged immediately in the Master Log and tagged.

#### *Tracking of Plants in Vegetative Phase*

The *Lead Cultivator* oversees the vegetative process. Well-documented cultivation procedures ensure that plant health and location, as well as actions performed during the vegetative phase, are tracked. Actions performed on plants are tracked by documenting individual plants, or entire batches of plants and recording the action taken. This might include watering, feeding, plant movement from one physical location to another, plant destruction due to plant sickness or pest infestation or plant progression through the next stage of cultivation. This information as well as the employee performing any such activity is recorded in the Master Log. A physical plant inventory is taken any time plants are moved. The *Lead Cultivator* performs random spot checks of the physical count and location of plants. Any discrepancy in physical plant inventory is traced to the source of the discrepancy, documented, and reported to the *Agent in Charge*. After further investigation, any appropriate corrective measures are taken.

#### *Tracking Actions of Plants During Flowering*

The *Lead Cultivator* oversees the flowering process. Well-documented cultivation procedures ensure that plant health and location, as well as actions performed during the flowering phase, are tracked. Actions performed on plants are tracked by documenting individual plants, or entire batches of plants and recording the action taken. This might include watering, feeding, plant movement from one physical location to another, plant destruction due to plant sickness or pest infestation or plant progression through the next stage of cultivation. This information as well as the employee performing any such activity is recorded in the Master Log. A physical plant inventory is taken any time plants are moved. The *Lead Cultivator* performs random spot checks of the physical count and location of plants. Any discrepancy in physical plant inventory is traced to the source of the discrepancy, documented, and reported to the *Agent in Charge*. After further investigation, any appropriate corrective measures are taken.

#### *Tracking the Change of Plants to Bulk Inventory*

In this phase of the lifecycle, the plant batches are changed from a living plant count inventory (where the plant is the unit) to bulk inventory, which is tracked by weight. This provides accurate yield information – a key insight into the cost of cultivation for each batch and the ability to forecast accurate yields for future batches. This information is added to the records created in the previous phase. Specific details that are recorded include:

- Initial harvest (wet) weight
- Weight after separation into flower, by-product, and waste

- Weight after trimming
- Staff identification (at each step)
- Physical location of the plant material at all times

#### *Reporting*

Daily reporting enables the *Lead Cultivator* to track productivity levels of staff involved in the harvest process, and identifies any discrepancies. The Master Log will contain reports on the harvest process, providing total weight harvested and trimmed at each weigh point, and compares that to final weight post-trim, including waste. This ensures that any discrepancy in weight is identified by the *Lead Cultivator and the Processing Manager*. Discrepancies are traced to the source, documented, and reported to the *Agent in Charge*. After investigation, any appropriate corrective measures are taken. This not only ensures that staff produce a quality final product in an efficient and timely manner, but also that inventory is not diverted as it is manicured and categorized. All cultivation and harvest records are retained for a minimum of five (5) years.

## **2.7. PROCESSING PLAN**

The Lead Cultivator will be responsible for all training of seasonal harvest and processing employees. Workers employed as harvesters/processors will be required to train in each aspect of the procedure including use of harvesting tools, proper harvesting techniques and fresh harvested plant handling, trimming machine use and handling of cured processed flowers. This training will also include the use of rubber gloves, face masks and hand washing requirements. Access to any part of the onsite Drying and Curing Facility will be limited to the Agent in Charge, the Lead Cultivator, the Process Manager, the Trimming Manager and authorized trained processing employees.

### **2.7.1. HARVESTING**

Harvesting will be done by hand employing seasonal help. Each harvester will be issued an agricultural grade, spring loaded, hand held anvil style pruner. Each harvester will be trained by the Lead Cultivator on the use of the pruner and the methods by which each plant is to be harvested. In addition, Pure Nature will provide all harvest workers with proper hand, eye, body and respiratory safety equipment.

At the time of harvest, each plant will be recorded into the master log. Each plant will be harvested individually. All waterleaf around the flowers are manually pruned. The plants are then cut into branches, approximately sixteen inches (16") long. The original numbered tag will remain with the cut plant. The branches are then transported to sheds and the processing building for drying and curing.

### **2.7.2. DRYING AND CURING**

Prior to entering the on-site drying and curing facilities, the product will be examined, weighed, recorded and logged into the Master Log by the Processing Manager. Branches will be hung on racks in metal shed to air dry and cure or on racks within the proposed processing building which will have dehumidifiers/heaters and circulation in the form of wall fans, exhaust fans and box fans. Each rack will contain the original numbered tag(s) of the plant(s). The exact date and time of day along with the identification numbers of each plant(s) will immediately be recorded into the Master Log.

The drying and curing process takes between five (5) and seven (7) days. The Processing Manger and the Lead Cultivator will be checking the facility five (5) to six (6) times per day to monitor the progress. Once the material has reached the desire consistency the processing will begin. At this stage the

Processing Manager will also randomly select up to five batch samples for third party testing. The samples will be vacuum sealed and labeled with a batch number, strain, plant number and site number and recorded into the Master Log.

### 2.7.3. PROCESSING

Once the *Lead Cultivator* has determined the drying and curing process meets Pure Nature proprietary standards, the dried and cured flowers are sent to process. The *Lead Cultivator* will then instruct the *Processing Manager* to remove the racks from the drying and curing chamber and begin the processing procedures. Processing will consist of three following main components: *Bucking Down*, *Trimming and Packaging*. The *Processing Manager* will be responsible for training employees hired as processors. This training will include the *bucking down* procedure and proper use of automatic trimming machines, along with the use of rubber gloves, particulate masks and hand washing.

*Bucking Down* is the process by which the actual flowers or buds are removed from the stalks. This is achieved by using scissors to cut each individual bud from the stalk into a sterilized, locking lid bin. The discarded stalks will then be shredded and composted on site. Once each bin is full the Processing Manager will seal, label, weigh and record in the Master Log the contents of each bin. Great care will be taken to ensure that each of the original numbered tags of the plants the bin contains are affixed to the corresponding bin. Each bin will then be moved into the trimming room. Once the bins arrive in the trimming room the Processing Manager will record the date, time of day, weight and plant(s) or batch number(s) into the Master Log. Once all of the flowers from the drying chamber have been bucked down, binned and recorded the trimming process will begin.

Trimming will be done via trimming machines and by hand via seasonal labor. Pure Nature will employ the use of a *Trimming Machine*. Trimming will also be done by hand by experienced seasonal labor. The trimmed material will be placed into sterilized locking lid bins. These bins will be weighed, labeled, logged and sealed. Great care will be taken to ensure that the original numbered corresponding plant tag remains affixed to each bin. The Processing Manager will then deliver the sealed and logged bins to the processed materials holding facility.

The waste product from the machines or "trim" will be collected and placed into sterilized locking lid bins. These bins will then be weighed, labeled and sealed for transport and delivery to an offsite, contracted, licensed Manufacturing Facility. All weights will be recorded in the master log. Upon completion of the trimming process, the *Processing Manger* will turn over all of the now processed material to the *Agent in Charge* or the *Lead Cultivator* and log this action in the Master Log. Only the *Agent in Charge* or the *Lead Cultivator* can accept and handle material in the processed state. Once in control of either the *Agent in Charge* or the *Lead Cultivator* the final processed material is removed from the processing floor and moved to a secured and locked storage area within the processing facility. This facility will be only accessible to either the *Agent in Charge* or the *Lead Cultivator*. Once securely in the Processed Material Holding Facility, the *Agent in Charge* and the *Lead Cultivator* will begin to weigh, vacuum seal and label individual one pound packages for distribution. This procedure will be done always with both the *Agent in Charge* and the *Lead Cultivator* present. After weighing, labeling and packaging each unit will be placed inside of a lock box or safe inside the *Processed Materials Holding Facility*.

### 2.7.4. DESCRIPTION OF PROCESSING LOCATION

Pure Nature will conduct all processing on site at the proposed processing facility. This facility will incorporate all aspects of processing including drying, curing, bucking down and machine trimming. The site was picked due to its favorable qualities for building. The site had been soil sampled and a percolation test was conducted. This facility will be housed in an approximately eight hundred square



foot (800 SF) metal building that conforms to commercial building standards per the 2016 California Building Code. Once the required approvals are in place, the metal building will be constructed upon a cement slab and all work will be conducted by licensed and bonded contractors in accordance with Humboldt County Building Codes. The Pure Nature will employ best management practices to ensure proper maintenance, not only of the structure, but of the site as well. The interior of the building will house the drying and curing chamber, trimming machines, commercial stainless steel work tables and employee bathroom. The work space will be well lit and ventilated.

#### **2.7.5. NUMBER OF EMPLOYEES**

See Section 2.5.3.

#### **2.7.6. SUMMARY OF EMPLOYEE SAFETY PRACTICES**

See Section 2.5.4.

#### **2.7.7. TOLIET AND HANDWASHING FACILITIES**

Pure Nature will install one (1) ADA-compliant restroom inside the processing center. The restroom will be clearly marked and well lit. It will include a working flush toilet as well as a sink with hot and cold running water. Hot water will be provided via a solar hot water heater with an on-demand propane hot water heater as back up. Anti-bacterial Liquid Soap and paper hand towels will be made available. Above the sink in a conspicuous place a *"Before Returning to Work"* hand washing procedure placard will be posted. The cleaning and sanitation of the restroom will be the responsibility of the Processing Manager. A record of cleanings will be kept in the restroom at all times and include date and time of day cleaned.

#### **2.7.8. PLUMBING AND SEPTIC SYSTEM**

See section 2.4.2.

#### **2.7.9. DRINKING WATER**

Pure Nature will provide safe, clean, purified drinking water via store bought individual sealed bottled water bottles as well as filtered water.

#### **2.7.10. ROAD USE AND MITIGATION STRATEGY**

Pure Nature started its initial road repair and maintenance activities. All roads are in the process of being out sloped or in sloped depending on the need. In addition, rolling dips have been inserted at regular intervals as required for standard maintenance for logging roads. All outlets for water are clear of debris and allow free flow of water from the road surface. All berms have been removed. In addition, all roads on the property are in the process of being rocked. Once initial road repair and maintenance activities are complete, seasonal maintenance will include regrading of out slopes and rolling water bars to ensure good run off. We will also replace rock where necessary.

Pure Nature will conduct road maintenance inspections during any and all *major rain events*. Pure Nature considers a *major rain event* to be any rainfall above one half inch (1/2"). This inspection will include observing existing features for any minor or major issues, such as rolling dips, standing water in outlets, and the diversion of water running directly down and eroding the road surface.

Pure Nature will implement procedures to reduce traffic on our roads. Transportation and deliveries of medical cannabis and associated supplies will be delivered in bulk to minimize road impacts. By employing the use of mechanical trimming and drying machines, Pure Nature will mitigate the need for a large number of employees for processing, therefore, reducing the number of daily trips to the

property. Pure Nature will encourage ride sharing to and from the site by seasonal employees. It will be the responsibility of the *Processing Manager* to arrange the transportation of seasonal employees.

#### **2.7.11. ON-SITE HOUSING**

A single family residence is existing for onsite housing and security purposes. A proposed 2-bedroom residence is proposed as a part of this project.

#### **2.8. SECURITY PLAN**

A locked gate is located at the entrance to the parcel. A *No Trespassing* sign is proposed near the gate. Cultivation facilities will be completely enclosed by a six-foot (6') security fence that features a locked gate. Proposed lighting outside of the cultivation and processing facility consists of a minimum of four (4) security lights that illuminate the entrances and parking areas. Pure Nature is proposing to have security cameras at the entrance to the site, residence, and processing facility with data storage for up to thirty (30) days. Motion sensors will be installed at all cultivation sites. The processing facility and residence will have an alarm system.

All potential employees will be subject to a criminal background check prior to employment. Employees will be issued a company issued ID badge and will be required to display the badge at all times while working at the subject property.

#### **2.9. TRANSPORTATION AND DISTRIBUTION PLAN**

Transportation will be handled via a third party, contracted, licensed transporter/distributor in accordance with MMRSA. All merchantable product will only be distributed through licensed medical cannabis dispensaries. Prior to moving packages from the on-site holding facility to another physical location, a transport manifest will be created by the distributor/transporter. This distribution document is required for each movement of packages and will be recorded in the Master Log.

The *Agent in Charge* and the *Processing Manager* are responsible for performing a physical inventory of all packages being transported, ensuring that the physical inventory reconciles with the transport manifest, as well as the packaging material is intact and the labeling is secure. The distribution document records the current location and status of the packages, such as "in-transit" or "received." The licensed distributor must also create detailed transport manifests for the package distribution. The manifest contains details such as:

- Time of departure
- Time of arrival
- Product and product weight
- Route to be travelled
- Origin and destination addresses

### 3. RESOURCES

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<<http://www.boe.ca.gov/news/pdf/173.pdf>>

State of California. Guidelines for the Security and Non-Diversion of Marijuana Grown for Medical Use. August 2008.  
<[http://www.ag.ca.gov/cms\\_attachments/press/pdfs/n1601\\_medicalmarijuanaguidelines.pdf](http://www.ag.ca.gov/cms_attachments/press/pdfs/n1601_medicalmarijuanaguidelines.pdf)>

**Appendix A: Personnel  
Acknowledgement Form**

**Personnel Acknowledgement Form**

It is the intention of Pure Nature to create an enjoyable, safe and sane workplace. We feel that understanding and compliance with our Operations Manual will create just that. It is the responsibility of each employee to read and understand the procedures outlined herein. If after reading and reviewing this entire document, you have any questions please see the Agent in Charge immediately for clarification. By signing this document below, it confirms your reading, understanding and adherence to the entire *Pure Nature OPERATIONS MANUAL FOR MEDICAL CANNABIS CULTIVATION*.

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*Employee sign and date*

---

*Agent in Charge sign and date*

**Appendix B: Site Plan, Floor Plans  
and Elevations**

**Appendix C: Pesticide Storage,  
Handling and Application Plan**

**Pure Nature**

**Pesticide Storage, Handling and Application Plan**

All pesticides, disinfectants, fungicides and agricultural chemical products used by the Pure Nature, will maintain strict compliance with standards imposed by the Humboldt County Agricultural department and State of California Department of Agriculture Department and US Environmental Protection Agency. The manager will maintain a current Private Applicators License with the Humboldt County Agricultural Department. This license will be posted and a copy will be entered into the Manager's Handbook and available for view by any regulatory agency deemed appropriate by Humboldt County or State of California.

**Storage**

All pesticides, disinfectants, fungicides and agricultural chemicals will be secured in an appropriate locked and labeled housing and accessed only by those employees that have been trained under the guidelines of *State of California Agricultural Department Personal Pesticide Application License* guidelines in handling, application and disposal of each product. Entry into the locked facility will be logged by the Lead Cultivator. This log will include: The name of employee removing the material, the date and time of day and the amount and type of pesticide removed.

Any over-the-counter pesticide products may be applied by either the *Manager* or trained personnel in accordance with State of California Agricultural Department's Private Applicators License criteria. Training of employees will be in accordance with *State of California Private Applicators License* criteria. These products will be limited to safe chemicals recognized by the Humboldt County Department of Agriculture, the California Department of Agriculture and the Federal EPA. Copies of all MSDSs and labels will be clearly identified and maintained onsite at all times in the Lead Cultivators Handbook. Pure Nature will make available to its employees saline eye wash stations where ever pesticides are stored.

**Handling**

The handling of pesticides/fungicide will be done in accordance with *State of California Agricultural Department Personal Pesticide Application License* guidelines. Handling will include, transportation from retail outlet to cultivation site, logging and entering into secured, labeled storage, mixing, preparation, transport to application locations on site, application and disposal. These activities will be logged into the Master Log immediately by the *Lead Cultivator*. By having a strictly monitored Pesticide Management plan in place, Pure Nature will strive for a "ZERO SPILL POLICY". In the event of a spill, Pure Nature will maintain on site an Emergency Containment and Clean Up policy in accordance with *State of California Agricultural Department Personal Pesticide Application License* guidelines.

Pure Nature will also maintain on site in a clearly marked and accessible secure location any materials deemed necessary for clean up or spill containment and abatement. Pure Nature will maintain a well-



marked and easily accessible plan for accidental personnel exposure as well as proper applicators training as set forth by *State of California Agricultural Department Personal Pesticide Application License* guidelines in the event of such accidental exposure. Any spills or accidental personnel exposure will be reported to the appropriate agencies as deemed necessary by *State of California Agricultural Department Personal Pesticide Application License* guidelines. These incidents will also be documented into the Master Log by the Lead Cultivator.

### **Application**

All application will be done in accordance with *State of California Agricultural Department Personal Pesticide Application License* guidelines. A copy of all applications will be manually entered into the Master Log. Proper eye, face and body protective wear as well as approved respirators shall be provided by Pure Nature and worn and available at all times during application of all pesticides/fungicides. A preventive application program per manufactures directions and label requirements will be established from the onset of the plants initial transplant. Application frequency will vary with each phase of growth or infestation pressure. This will help to ensure the least amount of pesticide/fungicide will be needed. Application will end no less than thirty days before harvest or by manufactures able requirements, whichever is longer.

During application factors, such as wind, temperature and humidity will be taken into account. This will ensure that the pesticide/fungicide is used in the most efficient manner and will mitigate drift. Pesticides will be applied using a variety of methods including atomizer, back pack sprayer and air less sprayer. Nozzle types and pressure settings will be determined by manufacture directions. Anywhere pesticide is applied Pure Nature will provide a saline eye wash station in case of accidental exposure.

### **Disposal**

Any mixed solutions will be used to their entirety. In the event, there is a surplus of used mixed solution, it will be disposed of according to guidelines set forth by *State of California Agricultural Department Personal Pesticide Application License* procedures. After the applicator, has finished application, the protective wear shall be discarded and disposed according to *State of California Agricultural Department Private Applicators License* guidelines. All bottles, containers or receptacles that have come into contact with, or contained, any product that falls under the state's guidelines for pesticides, disinfectants, fungicides and agricultural chemicals shall be washed, rinsed and or disposed of according to strict EPA and *State of California Agricultural Department Private Applicators License* guidelines. Proper training of employees in rinsing, washing and disposal shall be overseen by the Licensed Lead Cultivator on premise. All washing, rinsing or disposal of any product packaging, applicator or protective clothing will be logged into the Master Log.

**Appendix D: Emergency  
Procedures and Contact  
Information**

## **Emergency Procedures Instructions Pure Nature**

*The first priority in the event of an emergency is for the safety of all people present. Move quickly out of danger area. Meet at assigned meeting place to get a headcount. Enact Emergency Procedures.*

### **Emergency Phone Numbers**

#### **Dial 911 for Fire/Police/Ambulance:**

- 1. Tell the operator which emergency service you want**
- 2. Wait until the service answers**
- 3. Give the following address:**

**Humboldt County APN 223-132-001  
444 Drew Drive  
Garberville CA, 95589**

- 4. Do not hang up until told to do so by the 911 Operator**

### **Other Emergency Contacts**

**Humboldt County Sheriff: 707-445-7251**

**Garberville Fire Station: 707-923-2645**

**Humboldt County HazMat: 707-445-6215**

**Humboldt County Ag Dept.: 707-441-5260**

## Fire and Emergency Procedures Checklist

*You must know and understand what to do if a fire occurs. Your first concern is the immediate safety of visitors and staff; secondly, the need to call emergency services and then to contain the fire but only if it is safe to do so. If help is available, allocate responsibilities to others to create a competent fire fighting team.*

- Evacuate people from the area
- If it is safe to do so, switch off power to all equipment
- Call the fire department (dial 911)
- If a small fire, use your fire extinguisher if it is safe to do so – try to contain and extinguish the fire
- If the fire is near a fuel tank, do not attempt to extinguish the fire – retreat to a safe distance
- Be prepared to direct the fire service to the scene

## Spill Procedures Checklist

*You must know and understand what to do if a spill occurs. Your first consideration is the immediate safety of visitors and staff; secondly, the need to call emergency services and then contain the spill if it is safe to do so. If help is available allocate responsibilities to others to create a competent team to deal with the spill.*

- If the spill is from the hose or tap, shut the isolation valve
- Warn people in area of the spill – evacuate if necessary
- Remove sources of ignition if flammable substance present
- Evaluate the spill – only respond if you believe it is safe to do so
- Refer to the safety data sheet or call on an approved handler or other specialists for advice
- If necessary, call emergency services and advise local authority
- Put on safety equipment (e.g. overalls, boots, gloves, eye protection, etc.)
- Contain the spill if it is safe to do so – utilize a drip tray or oversize container or spill kit to soak up the substance
- Dispose of waste safely as set out in the material safety data sheet

## **Incident Reporting**

*Every accident resulting in injury or damage to farm property must be reported to your manager immediately.*

**Respond to the accident promptly and positively**

**Collect relevant information about the accident**

**Develop and take remedial actions**

**Complete insurance claims and reports required**

### ***First Aid***

- A first aid kit must be kept on the premises and maintained
- All staff must know basic first aid procedures

### ***Minor Injury Accidents***

- Minor cuts and abrasions must be attended to immediately
- If in doubt, contact a physician or call 911

### ***Serious Injury Accidents***

- Call an ambulance immediately (dial 911)
- Seek the assistance of any first responder
- Stabilize Victim
- Advise your manager

### ***Property Damage***

- All damage to farm property must be reported to your manager

## Emergency First Aid-Procedures

### Control of Bleeding

1. Direct pressure – use your hand(s).
2. Elevate (raise) the limb
3. Apply a pad and firm bandage.
4. If necessary use clean rags or clothing.

#### *Remember!!*

- *Always check circulation below the bandage!*
- *If there is tingling, numbness or blueness  
loosen the bandage.*

### Management of Burns

1. Cool the burnt area with cool water for 10-15 minutes
2. If necessary, cover the burn with a clean dressing or plastic wrap before removing person to medical aid.

#### *Remember!!*

- *Do not burst blisters.*
- *Do not remove clothing that is stuck.*
- *Do not apply creams*

## **Management of Eye Injuries**

### **Foreign bodies in the eye(s)**

- 1. Wash the eye(s) with eyewash or clean water.**
- 2. If the foreign body is stuck to the eye DO NOT attempt remove.**
- 3. Place covering over the eye and obtain medical attention.**

### **Management of Chemicals in Eye(s)**

- 1. Wash the eye(s) with clean cool water for at least 15 minutes.**
- 2. Wash from near the nose outward.**
- 3. Always wash under the upper eyelid.**
- 4. Obtain medical attention**

### **Breathing**

**If a person is breathing but unconscious turn them on their side to prevent tongue swelling or vomit from obstructing airway.**

**If person *is not breathing***

- *Check airway for blockage and clear***
- *Call 911***
- *Administer CPR***



### **Location of Firefighting Equipment, Spill and First Aid Kits**

**A fire extinguisher is located in the following places:**

- *All Cold Frames*
- *Fertilizer Storage Facility*
- *Pesticide Storage Facility*
- *Drying and Processing Facility*

**A first aid kit is located in the following places:**

- *Cultivation Site*
- *Fertilizer Storage Facility*
- *Pesticide Storage Facility*
- *Drying and Curing Facility*

**A spill kit is located in the following places:**

- *Cultivation Site*
- *Fertilizer Storage Facility*
- *Pesticide Storage Facility*

**Appendix F: Material Data  
Safety Sheets**

Solar Winds Northern Lights

# Invoice

PO Box 2185  
Redway, CA 95560

Date	Invoice #
10/2/2012	411

Bill To
April Newlander



P.O. No.	Terms	Project

Quantity	Description	Rate	Amount
15	Sharp 235 watt solar panels	329.40	4,941.00T
1	DP&W TPM15 Top of Pole mount rack for 15 Sharp 235 watt solar panels	2,670.20	2,670.20T
1	Radian GS8048 inverter- includes Gs load center with all necessary DC and AC breakers. Mate 3 monitoring device, Comm Hub, and temp sensor.	6,422.40	6,422.40T
1	Outback flexmax 80 charge controller	642.00	642.00T
1	OB PV 6 space combiner box combiner box- includes 5-15 amp PV breakers	207.48	207.48T
8	Surrette 6 volt 350 AH battery	347.00	2,776.00T
1	Battery cable to inverter- 1 pair	420.00	420.00T
7	Battery interconnects	24.00	168.00T
1	Battery box and vent system	350.00	350.00T
1	Miscellaneous Electrical Parts-estimated- actual depends on array placement and inverter and battery placement	1,161.00	1,161.00T
1	8" Schedule 80 steel pole for top of pole rack	1,100.00	1,100.00T
	Lumber - 2x4's for pole placement, rebar,dobies,tie wire, etc.	286.06	286.06T
95	Labor per Man per Hour	65.00	6,175.00
	Shipping	840.00	840.00
	Permits obtained	775.37	775.37
	Equipment rental - rebar bender	39.00	39.00T
	Downpayment/ deposit		-15,000.00
Estimate does not include permits, freight, trenching, conduit & wire to house.		<b>Total</b>	

Solar Winds Northern Lights

PO Box 2185  
Redway, CA 95560

# Invoice

Date	Invoice #
4/12/2015	9502

<b>Bill To</b>
Nate Newlander GENERATOR



P.O. No.	Terms	Project
	Due on receipt	Generator

Quantity	Description	Rate	Amount
	<b>GENERATOR INSTALLATION</b>		
1	20 Kw propane generator - Battery Included	14,500.00	14,500.00T
	Miscellaneous Parts & Supplies	704.77	704.77T
12	Labor - per hour for 2 workers	130.00	1,560.00
	<b>PAD FOR GENERATOR</b>		
	Miscellaneous Parts & Supplies	27.00	27.00T
7.5	Labor per Man per Hour	65.00	487.50
2.5	Labor per Man per Hour	45.00	112.50
	<b>GAS FOR SHED</b>		
		319.49	319.49T
	NOTES: Warranty start up by Cummings Pacific additional charge of \$1500.00 Humboldt County Sales Tax	8.00%	1,244.10
		<b>Total</b>	<b>\$18,955.36</b>

Addendum – 10/2/2018

2.1. WATER SUPPLY AND WATER USE

Estimated Annual Irrigation Water Usage (Gallons)

Jan	Feb	Mar	April	May	June	July	Aug	Sept	Oct	Nov	Dec
500	3,000	5,500	7,000	9,500	8,000	9,500	10,000	11,500	3,500	2,000	500

The estimated annual water usage = 61,500 gallons. With 75,000 gallons of water storage installed there is an extra 13,500 gallons available for unforeseen circumstances, emergency uses, and fire storage backup.

2.6. CULTIVATION PLAN

2.6.1. PLANTING METHODS AND MEDIUMS

The mixed light cultivation will occur in four (4) greenhouses totaling 6,800 square feet. The greenhouses utilize a combination of artificial light and light deprivation to produce up to two (2) flowering cycles per year. The outdoor cultivation will occur outdoor totaling 3,100 square feet and in two (2) outdoor unlighted greenhouses totaling 3,200 square feet. The outdoor cultivation area is expected to produce one (1) flowering cycle per year.

The cultivation facilities will utilize established and proven cultivation techniques shown to be effective for the commercial cultivation of medical cannabis species. The plants will be cultivated outdoors in 200 gallon geopots and in raised beds within cold frame greenhouses (see Attachment C – Site Plans, Floor Plans and Elevations). The cold frames will consist of heavy gauge steel tubing, covered with a woven poly translucent opaque tarp. Each cold frame will be ventilated by intake and exhaust fans as well as roll up side panels. Cold frames and solar power systems will be installed per the 2016 current California Building Code. The cold frames will contain raised beds. These methods will run independently of each other. Using this methodology, Pure Nature will be able to create an advantageous environment for flowering.

Pure Nature will use black out tarps for mitigation of mixed light use in excess of daylight hours, and during certain times of the year in order to maintain a twelve (12) hour light-to-dark period. This method of cultivating is commonly known as ‘light deprivation’. By manipulating the amount of light the medical cannabis plants are receiving, Pure Nature will force flowering even during the elongated daylight hours of summer months. This cultivation method makes the most economical use of our stored water supply as the life cycle of each plant will be reduced. In turn, more frequent but smaller harvests will occur. The mixed light cultivation will produce two (2) flowering cycles per year.

Pure Nature will propagate and grow on site from clone and seed.

Final Planting will be done in raised beds within the mixed light and outdoor greenhouses and in 200 gallon geopots in the outdoor cultivation area. Raised beds will measure the length of the greenhouse by fifteen feet width by thirty-six inches in height. Each cold frame structure will house two raised beds. The beds will be constructed in such a way as to allow drainage from the bottom. Each bed will be filled with an organic, nutrient-rich proprietary soil formula. A complete list of base soil and amendments will

be recorded in the Lead Cultivators Handbook. All soil and amendments, MSDS for each applicable amendment will be recorded in the Lead Cultivators Handbook. The total amount of plants per bed is dependent upon the cultivar and run length.

## 2.6.2. IRRIGATION AND FERTILIZER PRACTICES

Pure Nature will implement water resource management strategies designed in consultation with a local engineering firm to address water needs for the commercial medical cannabis activities described within this cultivation and operations manual. This plan may include but not be limited to:

- Annual forbearance as determined by a Water Availability Analysis
- Obtaining a Lake or Streambed Alteration Agreement for the water diversion works and storage through the Department of Fish and Wildlife (DFW)
- Enrollment in the North Coast Regional Water Quality Control Board's (NCRWQCB) Cannabis Cultivation Discharge Program (Order #R1-2015-00230, which includes preparation of a Water Resources Protection Plan (WRPP).

Water for the Project (agricultural irrigation) will be from a rain catchment system. Water for the site (domestic use) is drawn from spring and routed to storage tanks. The source of the water and the associated water rights and permits will be dependent on the requirements of the State of California. An appropriative right for irrigation will be obtained from the State Water Resources Control Board (SWRCB) and an LSAA for the water catchment overflow works. Pure Nature registered with the NCRWQCB as a Tier 2 Cultivation site. Water meters will be installed at the greenhouse to monitor water use for cultivation and reported with the end of year monitoring report.

The Lead Cultivator will be solely responsible for the implementation of the irrigation and fertilization program. The Lead Cultivator will also provide the necessary training of Seasonal Labor and oversee all product handling. All safety, handling and mixing as well as application procedure training will be organized by the Lead Cultivator and detailed in the Lead Cultivator Handbook. Annual training sessions will ensure all safety guidelines issued by the manufacturer, Humboldt County Agricultural Department, State of California Agricultural Department and Federal Environmental Protection Agency and Pure Nature are followed. All fertilizers will be stored in water-tight locked housings. These housing will be properly labeled as to denote their contents. All MSDS will be recorded and available for inspection in The Lead Cultivator's Handbook. At all locations fertilizers are to be mixed, applied or stored, Pure Nature will install saline eye wash stations. In addition, Pure Nature will provide any employee with proper hand, eye and body and respiratory protection deemed necessary by manufacture labeling requirements.

A proprietary nutrient solution is brewed as needed by the Lead Cultivator and housed in a light-resistant, agricultural grade fertilization holding tank at each site. Each batch solution mixed is then logged into the Master Log. The solution is formulated by manufacturer instructions. All fertilizers and supplements to be used are compliant with all Humboldt County and State of California Department of Agriculture label requirements. MSDS and labels will be available onsite in the Lead Cultivator Handbook.

Irrigation and fertigation of plants will consist of BluMat drip irrigation. The irrigation system is designed to give the plants the exact amount of water they need. It has meters to ensure soil is staying at desired moisture level. This system is explained further in Addendum 2.1.1. Additional hand watering/feeding will be implemented at the direction of the Lead Cultivator, as needed. It will consist of microbial inoculation and be hand-watered.

### 2.6.3. CULTIVATION SCHEDULE

#### Cultivation Schedule for Mixed Light Cultivation

Raising Nursery Stock, Initial Transplant: (Raising nursery stock ongoing; Initial Transplant -- February 15, May 15, August 15)

All plant samples used in Pure Nature's cultivation sites will be started from seed or composed of clones taken from 'mother' plants. Mother plants are composed of samples that have been deemed to demonstrate superior genetics for desired outcomes. Cuttings, or clones, are taken from the mother plants (on-site nursery) or from plants of previous round that are in vegetative growth. These cuttings are then rooted at the on-site nursery. The Lead Cultivator will examine the clones and approve initial planting to begin.

Upon the Lead Cultivator's approval, the Initial Transplant will commence. The rooted clones will be planted directly into one (1) gallon plastic containers and stay in nursery until deemed necessary to plant out into greenhouses. This point in the cultivation process most often referred to as the 'vegetative' cycle. Due to container and plant size, utilizing a hand watering method is most effective. The Initial Transplant phase lasts from one to two weeks depending on the desired outcome. During this phase the adolescent plants are irrigated using hand watering methods and fertilized using our high nitrogen proprietary feeding program. All fertilizers and supplements used are in accordance with Humboldt County and State of California Department of Agriculture compliance. MSDS are recorded into the Lead Cultivator's Handbook. At this point, the pesticide/fungicide management plan is implemented. (see Attachment D - Pesticide Application and Storage Plan for pesticide storage, handling, application and disposal procedures)

Final Transplant: (March 1, June 1, September 1)

When the Lead Cultivator has determined the plants have achieved desired height and plant growth density for final transplant, they are taken out of on-site nursery and immediately planted into either a raised bed or hügelkultur mound (full-sun only). Due to the increase in rooting area and increase in artificial/ daylight hours, the plants will continue to grow in a vegetative state for two to four (2-4) weeks. The approximate desired height and growth density would be two to three feet (2'-3'). During the Final Transplant / Vegetative Phase, the plants are fertilized using our high nitrogen proprietary feeding program. All fertilizers and supplements used are in accordance with Humboldt County and State of California Department of Agriculture compliance. MSDS are recorded into the Lead Cultivators Handbook. Once this desired height and vegetative growth density has been achieved the Light Deprivation Phase begins.

Light Deprivation Phase: (April 1-- June 1; July 1 -- Sept 1; Oct 1 -- Dec 1)

Taking into account factors such as height, growth density and overall health of the plant, the Lead Cultivator will determine the exact date for the Light Deprivation process to begin. Once that date is determined, 100% light resistant, tarps will be pulled over the cold frames. This process will reduce the day light hours from approximately fifteen (15) hours of daylight to the desired twelve (12) hours of daylight, twelve (12) hours of darkness desired to induce flowering. During the first two weeks of Light Deprivation, the plants will enter into a transitional phase. During this transitional phase plants will continue vegetative growth while transitioning into flowering. Once the plants enter the budding stage they will be fertilized using a proprietary blend of high phosphorus fertilizers as well as aerobic based

supplements. All products used are in compliance with state and federal agricultural guidelines and corresponding MSD and labels are recorded into the Lead Cultivator's Handbook.

It is not uncommon for plants to obtain 25% of their entire height and vegetative growth density during the transitional phase. Once the plants enter in the final bloom or flowering phase, they will begin to expend energy into the production of flowers, therefore, ceasing vegetative growth and begin to flower. The entire flowering process, including the transitional and final bloom phases, will last fifty-five (55) to sixty-five (65) days depending on strain variation and weather conditions.

Harvest: (June 1; Sept 1; Dec 1)

Once the Light Deprivation Phase has concluded and the Lead Cultivator has determined the plants are at their peak, harvest procedures will be initiated (see Harvesting/Processing Plan for harvesting and processing procedure). The plants will be chopped at ground level and soil left undisturbed to maintain living soils and water retention. If amendments are used they are top dressed and covered with a mulch layer. All amendments used are in accordance with Humboldt County and State of California Department of Agriculture compliance. MSDS are recorded into the Lead Cultivators Handbook.

Re-Planting: (June; Sept)

New clones will be transplanted from the Nursery. Due to the length of artificial/ daylight hours, the plants will continue in a vegetative state for approximately two weeks. Plants will be planted using the same methodology as with the Initial Transplant Phase. Final Transplant will occur when deemed appropriate by the Lead Cultivator, usually seven to 14 days from initial transplant.

Repair, Upgrade and Recondition: (December 1 – January 31)

Pure Nature will inspect all cold frames and covers for wear and replace as necessary. The irrigation system will be inspected and repaired or replaced, as appropriate. Refilling of irrigation tanks will commence in accordance with the Small Irrigation Use Registration and conditions of the Department of Fish and Wildlife (DFW) Lake or Streambed Alteration Agreement (LSAA). Winter road and site maintenance will begin in line with procedures outlined in the Site and Road Maintenance Plan. The Agent in Charge and the Lead Cultivator will meet weekly to determine the best action plan for the upcoming season.

#### Cultivation Schedule for Full-Sun Cultivation

Seeds will be propagated from selected genetics in February and grown in on-site nursery. Males will be culled at the two-month mark and kept for breeding or composted. Selected females will be transplanted into one-gallon plastic containers in April. In May plants are transplanted into 7-gallon plastic containers and grown in on-site nursery for one month. Plants are then transplanted into full-sun hügelkultur beds in June. Plants are given two weeks to acclimate and then are caged with subsequent trellis with growth, before flowering. Plants flower from August to October. Harvest occurs during October.

#### 2.6.4. GENERATOR USE PLAN

Due to the remote location and off the grid nature of the site, it will be necessary for Pure Nature to employ the use of a generator for backup power, plans are in process with PG&E for electric connection. Pure Nature will limit the use of the generator to an as needed basis following all guidelines set up by Humboldt County and the State of California. Two small generators will be used for backup power on site. The generators will be located over one hundred feet from the property line to ensure the noise level



will not exceed 60 decibels at the property line. Currently there is a generator to power the existing residence.

## 2.6.5. PRODUCT INVENTORY AND TRACKING

Until such time as either a County or Statewide seed to sale tracking system can be implemented, Pure Nature intends to follow an internally-developed tracking procedure. An inventory of all plants shall be performed by the Agent in Charge and Lead Cultivator on a daily basis. Batches of plants are inventoried by logging into record the individual plant tags of each plant located at the base of each plant. This takes into account any plants that have been added to inventory from a permitted medical cannabis nursery and any plants that were removed from inventory or any plants moved to another phase of its lifecycle and any plants that have been destroyed. Any discrepancy in physical plant inventory is traced to the source of the discrepancy, documented. After further investigation, any appropriate corrective measures will be taken.

### Intake of Clones from Nursery

The Lead Cultivator oversees the entire cultivation process, from initial intake of clones from the Nursery to final harvest. Well-documented intake procedures ensure that clones procured from the Nursery are taken in, logged immediately in the Master Log and tagged.

### Tracking of Plants in Vegetative Phase

The Lead Cultivator oversees the vegetative process. Well-documented cultivation procedures ensure that plant health and location, as well as actions performed during the vegetative phase, are tracked. Actions performed on plants are tracked by documenting individual plants, or entire batches of plants and recording the action taken. This might include watering, feeding, plant movement from one physical location to another, plant destruction due to plant sickness or pest infestation or plant progression through the next stage of cultivation. This information as well as the employee performing any such activity is recorded in the Master Log. A physical plant inventory is taken any time plants are moved. The Lead Cultivator performs random spot checks of the physical count and location of plants. Any discrepancy in physical plant inventory is traced to the source of the discrepancy, documented, and reported to the Agent in Charge. After further investigation, any appropriate corrective measures are taken. Tracking Actions of Plants During Flowering

The Lead Cultivator oversees the flowering process. Well-documented cultivation procedures ensure that plant health and location, as well as actions performed during the flowering phase, are tracked. Actions performed on plants are tracked by documenting individual plants, or entire batches of plants and recording the action taken. This might include watering, feeding, plant movement from one physical location to another, plant destruction due to plant sickness or pest infestation or plant progression through the next stage of cultivation. This information as well as the employee performing any such activity is recorded in the Master Log. A physical plant inventory is taken any time plants are moved. The Lead Cultivator performs random spot checks of the physical count and location of plants. Any discrepancy in physical plant inventory is traced to the source of the discrepancy, documented, and reported to the Agent in Charge. After further investigation, any appropriate corrective measures are taken.

### Tracking the Change of Plants to Bulk Inventory

In this phase of the lifecycle, the plant batches are changed from a living plant count inventory (where the plant is the unit) to bulk inventory, which is tracked by weight. This provides accurate yield information – a key insight into the cost of cultivation for each batch and the ability to forecast accurate yields for future

batches. This information is added to the records created in the previous phase. Specific details that are recorded include:

- Initial harvest (wet) weight
- Weight after separation into flower, by-product, and waste
- Weight after trimming
- Staff identification (at each step)
- Physical location of the plant material at all times

### Reporting

Daily reporting enables the Lead Cultivator to track productivity levels of staff involved in the harvest process, and identifies any discrepancies. The Master Log will contain reports on the harvest process, providing total weight harvested and trimmed at each weigh point, and compares that to final weight post-trim, including waste. This ensures that any discrepancy in weight is identified by the Lead Cultivator and the Processing Manager. Discrepancies are traced to the source, documented, and reported to the Agent in Charge. After investigation, any appropriate corrective measures are taken. This not only ensures that staff produce a quality final product in an efficient and timely manner, but also that inventory is not diverted as it is manicured and categorized. All cultivation and harvest records are retained for a minimum of five (5) years.

Addendum – 10/2/2018

2.1. WATER SUPPLY AND WATER USE

Estimated Annual Irrigation Water Usage (Gallons)

Jan	Feb	Mar	April	May	June	July	Aug	Sept	Oct	Nov	Dec
500	3,000	5,500	7,000	9,500	8,000	9,500	10,000	11,500	3,500	2,000	500

The estimated annual water usage = 61,500 gallons. With 75,000 gallons of water storage installed there is an extra 13,500 gallons available for unforeseen circumstances, emergency uses, and fire storage backup.

2.6. CULTIVATION PLAN

2.6.1. PLANTING METHODS AND MEDIUMS

The mixed light cultivation will occur in four (4) greenhouses totaling 6,800 square feet. The greenhouses utilize a combination of artificial light and light deprivation to produce up to two (2) flowering cycles per year. The outdoor cultivation will occur outdoor totaling 3,100 square feet and in two (2) outdoor unlighted greenhouses totaling 3,200 square feet. The outdoor cultivation area is expected to produce one (1) flowering cycle per year.

The cultivation facilities will utilize established and proven cultivation techniques shown to be effective for the commercial cultivation of medical cannabis species. The plants will be cultivated outdoors in 200 gallon geopots and in raised beds within cold frame greenhouses (see Attachment C – Site Plans, Floor Plans and Elevations). The cold frames will consist of heavy gauge steel tubing, covered with a woven poly translucent opaque tarp. Each cold frame will be ventilated by intake and exhaust fans as well as roll up side panels. Cold frames and solar power systems will be installed per the 2016 current California Building Code. The cold frames will contain raised beds. These methods will run independently of each other. Using this methodology, Pure Nature will be able to create an advantageous environment for flowering.

Pure Nature will use black out tarps for mitigation of mixed light use in excess of daylight hours, and during certain times of the year in order to maintain a twelve (12) hour light-to-dark period. This method of cultivating is commonly known as ‘light deprivation’. By manipulating the amount of light the medical cannabis plants are receiving, Pure Nature will force flowering even during the elongated daylight hours of summer months. This cultivation method makes the most economical use of our stored water supply as the life cycle of each plant will be reduced. In turn, more frequent but smaller harvests will occur. The mixed light cultivation will produce two (2) flowering cycles per year.

Pure Nature will propagate and grow on site from clone and seed.

Final Planting will be done in raised beds within the mixed light and outdoor greenhouses and in 200 gallon geopots in the outdoor cultivation area. Raised beds will measure the length of the greenhouse by fifteen feet width by thirty-six inches in height. Each cold frame structure will house two raised beds. The beds will be constructed in such a way as to allow drainage from the bottom. Each bed will be filled with an organic, nutrient-rich proprietary soil formula. A complete list of base soil and amendments will

be recorded in the Lead Cultivators Handbook. All soil and amendments, MSDS for each applicable amendment will be recorded in the Lead Cultivators Handbook. The total amount of plants per bed is dependent upon the cultivar and run length.

## 2.6.2. IRRIGATION AND FERTILIZER PRACTICES

Pure Nature will implement water resource management strategies designed in consultation with a local engineering firm to address water needs for the commercial medical cannabis activities described within this cultivation and operations manual. This plan may include but not be limited to:

- Annual forbearance as determined by a Water Availability Analysis
- Obtaining a Lake or Streambed Alteration Agreement for the water diversion works and storage through the Department of Fish and Wildlife (DFW)
- Enrollment in the North Coast Regional Water Quality Control Board's (NCRWQCB) Cannabis Cultivation Discharge Program (Order #R1-2015-00230, which includes preparation of a Water Resources Protection Plan (WRPP).

Water for the Project (agricultural irrigation) will be from a rain catchment system. Water for the site (domestic use) is drawn from spring and routed to storage tanks. The source of the water and the associated water rights and permits will be dependent on the requirements of the State of California. An appropriative right for irrigation will be obtained from the State Water Resources Control Board (SWRCB) and an LSAA for the water catchment overflow works. Pure Nature registered with the NCRWQCB as a Tier 2 Cultivation site. Water meters will be installed at the greenhouse to monitor water use for cultivation and reported with the end of year monitoring report.

The Lead Cultivator will be solely responsible for the implementation of the irrigation and fertilization program. The Lead Cultivator will also provide the necessary training of Seasonal Labor and oversee all product handling. All safety, handling and mixing as well as application procedure training will be organized by the Lead Cultivator and detailed in the Lead Cultivator Handbook. Annual training sessions will ensure all safety guidelines issued by the manufacturer, Humboldt County Agricultural Department, State of California Agricultural Department and Federal Environmental Protection Agency and Pure Nature are followed. All fertilizers will be stored in water-tight locked housings. These housing will be properly labeled as to denote their contents. All MSDS will be recorded and available for inspection in The Lead Cultivator's Handbook. At all locations fertilizers are to be mixed, applied or stored, Pure Nature will install saline eye wash stations. In addition, Pure Nature will provide any employee with proper hand, eye and body and respiratory protection deemed necessary by manufacture labeling requirements.

A proprietary nutrient solution is brewed as needed by the Lead Cultivator and housed in a light-resistant, agricultural grade fertilization holding tank at each site. Each batch solution mixed is then logged into the Master Log. The solution is formulated by manufacturer instructions. All fertilizers and supplements to be used are compliant with all Humboldt County and State of California Department of Agriculture label requirements. MSDS and labels will be available onsite in the Lead Cultivator Handbook.

Irrigation and fertigation of plants will consist of BluMat drip irrigation. The irrigation system is designed to give the plants the exact amount of water they need. It has meters to ensure soil is staying at desired moisture level. This system is explained further in Addendum 2.1.1. Additional hand watering/feeding will be implemented at the direction of the Lead Cultivator, as needed. It will consist of microbial inoculation and be hand-watered.

### 2.6.3. CULTIVATION SCHEDULE

#### Cultivation Schedule for Mixed Light Cultivation

Raising Nursery Stock, Initial Transplant: (Raising nursery stock ongoing; Initial Transplant – February 15, May 15, August 15)

All plant samples used in Pure Nature's cultivation sites will be started from seed or composed of clones taken from 'mother' plants. Mother plants are composed of samples that have been deemed to demonstrate superior genetics for desired outcomes. Cuttings, or clones, are taken from the mother plants (on-site nursery) or from plants of previous round that are in vegetative growth. These cuttings are then rooted at the on-site nursery. The Lead Cultivator will examine the clones and approve initial planting to begin.

Upon the Lead Cultivator's approval, the Initial Transplant will commence. The rooted clones will be planted directly into one (1) gallon plastic containers and stay in nursery until deemed necessary to plant out into greenhouses. This point in the cultivation process most often referred to as the 'vegetative' cycle. Due to container and plant size, utilizing a hand watering method is most effective. The Initial Transplant phase lasts from one to two weeks depending on the desired outcome. During this phase the adolescent plants are irrigated using hand watering methods and fertilized using our high nitrogen proprietary feeding program. All fertilizers and supplements used are in accordance with Humboldt County and State of California Department of Agriculture compliance. MSDS are recorded into the Lead Cultivator's Handbook. At this point, the pesticide/fungicide management plan is implemented. (see Attachment D - Pesticide Application and Storage Plan for pesticide storage, handling, application and disposal procedures)

Final Transplant: (March 1, June 1, September 1)

When the Lead Cultivator has determined the plants have achieved desired height and plant growth density for final transplant, they are taken out of on-site nursery and immediately planted into either a raised bed or hügelkultur mound (full-sun only). Due to the increase in rooting area and increase in artificial/ daylight hours, the plants will continue to grow in a vegetative state for two to four (2-4) weeks. The approximate desired height and growth density would be two to three feet (2'-3'). During the Final Transplant / Vegetative Phase, the plants are fertilized using our high nitrogen proprietary feeding program. All fertilizers and supplements used are in accordance with Humboldt County and State of California Department of Agriculture compliance. MSDS are recorded into the Lead Cultivators Handbook. Once this desired height and vegetative growth density has been achieved the Light Deprivation Phase begins.

Light Deprivation Phase: (April 1– June 1; July 1 – Sept 1; Oct 1 – Dec 1)

Taking into account factors such as height, growth density and overall health of the plant, the Lead Cultivator will determine the exact date for the Light Deprivation process to begin. Once that date is determined, 100% light resistant, tarps will be pulled over the cold frames. This process will reduce the day light hours from approximately fifteen (15) hours of daylight to the desired twelve (12) hours of daylight, twelve (12) hours of darkness desired to induce flowering. During the first two weeks of Light Deprivation, the plants will enter into a transitional phase. During this transitional phase plants will continue vegetative growth while transitioning into flowering. Once the plants enter the budding stage they will be fertilized using a proprietary blend of high phosphorus fertilizers as well as aerobic based

supplements. All products used are in compliance with state and federal agricultural guidelines and corresponding MSD and labels are recorded into the Lead Cultivator's Handbook.

It is not uncommon for plants to obtain 25% of their entire height and vegetative growth density during the transitional phase. Once the plants enter in the final bloom or flowering phase, they will begin to expend energy into the production of flowers, therefore, ceasing vegetative growth and begin to flower. The entire flowering process, including the transitional and final bloom phases, will last fifty-five (55) to sixty-five (65) days depending on strain variation and weather conditions.

Harvest: (June 1; Sept 1; Dec 1)

Once the Light Deprivation Phase has concluded and the Lead Cultivator has determined the plants are at their peak, harvest procedures will be initiated (see Harvesting/Processing Plan for harvesting and processing procedure). The plants will be chopped at ground level and soil left undisturbed to maintain living soils and water retention. If amendments are used they are top dressed and covered with a mulch layer. All amendments used are in accordance with Humboldt County and State of California Department of Agriculture compliance. MSDS are recorded into the Lead Cultivators Handbook.

Re-Planting: (June; Sept)

New clones will be transplanted from the Nursery. Due to the length of artificial/ daylight hours, the plants will continue in a vegetative state for approximately two weeks. Plants will be planted using the same methodology as with the Initial Transplant Phase. Final Transplant will occur when deemed appropriate by the Lead Cultivator, usually seven to 14 days from initial transplant.

Repair, Upgrade and Recondition: (December 1 – January 31)

Pure Nature will inspect all cold frames and covers for wear and replace as necessary. The irrigation system will be inspected and repaired or replaced, as appropriate. Refilling of irrigation tanks will commence in accordance with the Small Irrigation Use Registration and conditions of the Department of Fish and Wildlife (DFW) Lake or Streambed Alteration Agreement (LSAA). Winter road and site maintenance will begin in line with procedures outlined in the Site and Road Maintenance Plan. The Agent in Charge and the Lead Cultivator will meet weekly to determine the best action plan for the upcoming season.

#### Cultivation Schedule for Full-Sun Cultivation

Seeds will be propagated from selected genetics in February and grown in on-site nursery. Males will be culled at the two-month mark and kept for breeding or composted. Selected females will be transplanted into one-gallon plastic containers in April. In May plants are transplanted into 7-gallon plastic containers and grown in on-site nursery for one month. Plants are then transplanted into full-sun hügelkultur beds in June. Plants are given two weeks to acclimate and then are caged with subsequent trellis with growth, before flowering. Plants flower from August to October. Harvest occurs during October.

#### 2.6.4. GENERATOR USE PLAN

Due to the remote location and off the grid nature of the site, it will be necessary for Pure Nature to employ the use of a generator for backup power, plans are in process with PG&E for electric connection. Pure Nature will limit the use of the generator to an as needed basis following all guidelines set up by Humboldt County and the State of California. Two small generators will be used for backup power on site. The generators will be located over one hundred feet from the property line to ensure the noise level

will not exceed 60 decibels at the property line. Currently there is a generator to power the existing residence.

#### 2.6.5. PRODUCT INVENTORY AND TRACKING

Until such time as either a County or Statewide seed to sale tracking system can be implemented, Pure Nature intends to follow an internally-developed tracking procedure. An inventory of all plants shall be performed by the Agent in Charge and Lead Cultivator on a daily basis. Batches of plants are inventoried by logging into record the individual plant tags of each plant located at the base of each plant. This takes into account any plants that have been added to inventory from a permitted medical cannabis nursery and any plants that were removed from inventory or any plants moved to another phase of its lifecycle and any plants that have been destroyed. Any discrepancy in physical plant inventory is traced to the source of the discrepancy, documented. After further investigation, any appropriate corrective measures will be taken.

##### Intake of Clones from Nursery

The Lead Cultivator oversees the entire cultivation process, from initial intake of clones from the Nursery to final harvest. Well-documented intake procedures ensure that clones procured from the Nursery are taken in, logged immediately in the Master Log and tagged.

##### Tracking of Plants in Vegetative Phase

The Lead Cultivator oversees the vegetative process. Well-documented cultivation procedures ensure that plant health and location, as well as actions performed during the vegetative phase, are tracked. Actions performed on plants are tracked by documenting individual plants, or entire batches of plants and recording the action taken. This might include watering, feeding, plant movement from one physical location to another, plant destruction due to plant sickness or pest infestation or plant progression through the next stage of cultivation. This information as well as the employee performing any such activity is recorded in the Master Log. A physical plant inventory is taken any time plants are moved. The Lead Cultivator performs random spot checks of the physical count and location of plants. Any discrepancy in physical plant inventory is traced to the source of the discrepancy, documented, and reported to the Agent in Charge. After further investigation, any appropriate corrective measures are taken. Tracking Actions of Plants During Flowering

The Lead Cultivator oversees the flowering process. Well-documented cultivation procedures ensure that plant health and location, as well as actions performed during the flowering phase, are tracked. Actions performed on plants are tracked by documenting individual plants, or entire batches of plants and recording the action taken. This might include watering, feeding, plant movement from one physical location to another, plant destruction due to plant sickness or pest infestation or plant progression through the next stage of cultivation. This information as well as the employee performing any such activity is recorded in the Master Log. A physical plant inventory is taken any time plants are moved. The Lead Cultivator performs random spot checks of the physical count and location of plants. Any discrepancy in physical plant inventory is traced to the source of the discrepancy, documented, and reported to the Agent in Charge. After further investigation, any appropriate corrective measures are taken.

##### Tracking the Change of Plants to Bulk Inventory

In this phase of the lifecycle, the plant batches are changed from a living plant count inventory (where the plant is the unit) to bulk inventory, which is tracked by weight. This provides accurate yield information – a key insight into the cost of cultivation for each batch and the ability to forecast accurate yields for future

batches. This information is added to the records created in the previous phase. Specific details that are recorded include:

- Initial harvest (wet) weight
- Weight after separation into flower, by-product, and waste
- Weight after trimming
- Staff identification (at each step)
- Physical location of the plant material at all times

### Reporting

Daily reporting enables the Lead Cultivator to track productivity levels of staff involved in the harvest process, and identifies any discrepancies. The Master Log will contain reports on the harvest process, providing total weight harvested and trimmed at each weigh point, and compares that to final weight post-trim, including waste. This ensures that any discrepancy in weight is identified by the Lead Cultivator and the Processing Manager. Discrepancies are traced to the source, documented, and reported to the Agent in Charge. After investigation, any appropriate corrective measures are taken. This not only ensures that staff produce a quality final product in an efficient and timely manner, but also that inventory is not diverted as it is manicured and categorized. All cultivation and harvest records are retained for a minimum of five (5) years.



HUMBOLDT COUNTY DEPARTMENT OF PUBLIC WORKS  
ROAD EVALUATION REPORT

**PART A:** Part A may be completed by the applicant

Applicant Name: NATHAN CHEVALIER APN: 223-132-001-000

Planning & Building Department Case/File No.: 11075

Road Name: UPPER SAWMILL (complete a separate form for each road)

From Road (Cross street): ALDERPOINT RD

To Road (Cross street): SAWMILL

Length of road segment: 0.6 miles Date Inspected: 2/27/18

Road is maintained by:  County  Other UPPER SAWMILL POAA ASSOCIATION  
(State, Forest Service, National Park, State Park, BLM, Private, Tribal, etc)

Check one of the following:

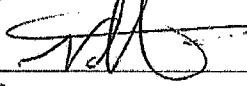
Box 1  The entire road segment is developed to Category 4 road standards (20 feet wide) or better. If checked, then the road is adequate for the proposed use without further review by the applicant.

Box 2  The entire road segment is developed to the equivalent of a road category 4 standard. If checked, then the road is adequate for the proposed use without further review by the applicant.

*An equivalent road category 4 standard is defined as a roadway that is generally 20 feet in width, but has pinch points which narrow the road. Pinch points include, but are not limited to, one-lane bridges, trees, large rock outcroppings, culverts, etc. Pinch points must provide visibility where a driver can see oncoming vehicles through the pinch point which allows the oncoming vehicle to stop and wait in a 20 foot wide section of the road for the other vehicle to pass.*

Box 3  The entire road segment is not developed to the equivalent of road category 4 or better. The road may or may not be able to accommodate the proposed use and further evaluation is necessary. Part B is to be completed by a Civil Engineer licensed by the State of California.

The statements in PART A are true and correct and have been made by me after personally inspecting and measuring the road.

  
Signature

2/27/18  
Date

NATHAN CHEVALIER  
Name Printed

**Important: Read the instructions before using this form. If you have questions, please call the Dept. of Public Works Land Use Division at 707.445.7205.**

HUMBOLDT COUNTY DEPARTMENT OF PUBLIC WORKS  
ROAD EVALUATION REPORT

**PART A:** Part A may be completed by the applicant

Applicant Name: NATHAN CHEVALIER APN: 223-132-001-000

Planning & Building Department Case/File No.: 11075

Road Name: SAWMILL (complete a separate form for each road)

From Road (Cross street): UPPER SAWMILL

To Road (Cross street): AREW DRIVE

Length of road segment: 0.8 miles Date Inspected: 2/27/18

Road is maintained by:  County  Other \_\_\_\_\_  
(State, Forest Service, National Park, State Park, BLM, Private, Tribal, etc)

Check one of the following:

Box 1  The entire road segment is developed to Category 4 road standards (20 feet wide) or better. If checked, then the road is adequate for the proposed use without further review by the applicant.

Box 2  The entire road segment is developed to the equivalent of a road category 4 standard. If checked, then the road is adequate for the proposed use without further review by the applicant.

*An equivalent road category 4 standard is defined as a roadway that is generally 20 feet in width, but has pinch points which narrow the road. Pinch points include, but are not limited to, one-lane bridges, trees, large rock outcroppings, culverts, etc. Pinch points must provide visibility where a driver can see oncoming vehicles through the pinch point which allows the oncoming vehicle to stop and wait in a 20 foot wide section of the road for the other vehicle to pass.*

Box 3  The entire road segment is not developed to the equivalent of road category 4 or better. The road may or may not be able to accommodate the proposed use and further evaluation is necessary. Part B is to be completed by a Civil Engineer licensed by the State of California.

The statements in PART A are true and correct and have been made by me after personally inspecting and measuring the road.

[Signature]  
Signature

2/27/18  
Date

NATHAN CHEVALIER  
Name Printed

**Important: Read the instructions before using this form. If you have questions, please call the Dept. of Public Works Land Use Division at 707-445-7205.**

HUMBOLDT COUNTY DEPARTMENT OF PUBLIC WORKS  
ROAD EVALUATION REPORT

**PART A:** Part A may be completed by the applicant

Applicant Name: NATHAN CHEVALIER APN: 223-132-001-000

Planning & Building Department Case/File No.: 11075

Road Name: DREW DRIVE (complete a separate form for each road)

From Road (Cross street): SAWMELL

To Road (Cross street): 444 DREW DRIVE

Length of road segment: ~~0.8~~ 0.1 miles Date Inspected: 2/27/18

Road is maintained by:  County  Other \_\_\_\_\_  
(State, Forest Service, National Park, State Park, BLM, Private, Tribal, etc)

Check one of the following:

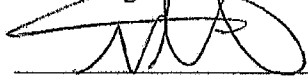
Box 1  The entire road segment is developed to Category 4 road standards (20 feet wide) or better. If checked, then the road is adequate for the proposed use without further review by the applicant.

Box 2  The entire road segment is developed to the equivalent of a road category 4 standard. If checked, then the road is adequate for the proposed use without further review by the applicant.

*An equivalent road category 4 standard is defined as a roadway that is generally 20 feet in width, but has pinch points which narrow the road. Pinch points include, but are not limited to, one-lane bridges, trees, large rock outcroppings, culverts, etc. Pinch points must provide visibility where a driver can see oncoming vehicles through the pinch point which allows the oncoming vehicle to stop and wait in a 20 foot wide section of the road for the other vehicle to pass.*

Box 3  The entire road segment is not developed to the equivalent of road category 4 or better. The road may or may not be able to accommodate the proposed use and further evaluation is necessary. Part B is to be completed by a Civil Engineer licensed by the State of California.

The statements in PART A are true and correct and have been made by me after personally inspecting and measuring the road.



Signature

2/27/18  
Date

NATHAN CHEVALIER  
Name Printed

**Important: Read the instructions before using this form. If you have questions, please call the Dept. of Public Works Land Use Division at 707.445.7205.**



**40° 06'53"N, 123° 45'14" W – Intersection of Alderpoint Rd and Upper Sawmill**



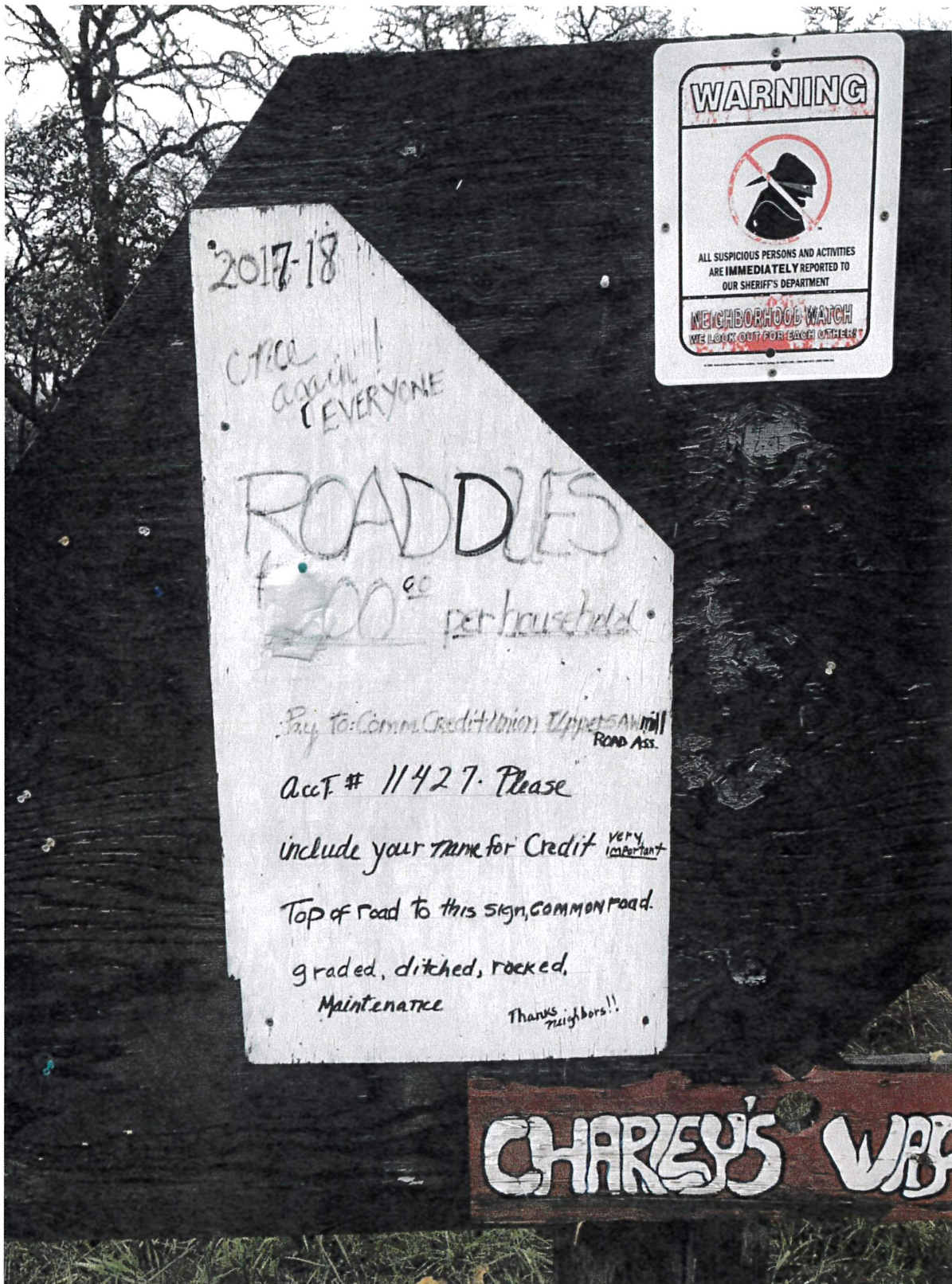
*40° 06'56"N, 123° 45'13" W – Upper Sawmill*



**40° 06'57"N, 123° 45'02" W – Upper Sawmill**



***40° 06'59"N, 123° 45'00" W – Intersection of Upper Sawmill and Sawmill***



40° 06'59"N, 123° 45'00" W





40° 07'00"N, 123° 45'01" W - Sawmill



**40° 07'14"N, 123° 45'01" W – Beginning of new PG&E service extension – coming in the next couple months**



**40° 07'27"N, 123° 44'56" W - Sawmill**



**40° 07'34"N, 123° 44'59" W – intersection of Sawmill and Drew Drive**



*40° 07'41"N, 123° 44'59" W – Drew Drive*



**40° 07'43"N, 123° 44'57" W – Entrance to 444 Drew Drive to the left**





**California Department of Fish and Wildlife  
CEQA Referral Checklist**

Applicant: Moontime Medicinals MBC		Date: 7/30/18	
APPS No.: 11075	APN: 223-132-001	CDFW CEQA: 2017-0579	Case No.: CUP16-142
<input type="checkbox"/> New	<input checked="" type="checkbox"/> Existing	<input checked="" type="checkbox"/> Mixed-light (SF): 1,600	<input checked="" type="checkbox"/> Outdoor (SF): 11,500 <input type="checkbox"/> Indoor <input type="checkbox"/> RRR

Thank you for referring this application to the California Department of Fish and Wildlife (CDFW) for review and comment.

CDFW offers the following comments on the Project in our role as a Trustee and Responsible Agency pursuant to the California Environmental Quality Act (CEQA; California Public Resource Code Section 21000 *et seq.*). These comments are intended to assist the Lead Agency in making informed decisions early in the planning process.

- Recommend Approval. The Department has no comment at this time.
- Recommend Conditional Approval. Suggested conditions below.
- Applicant needs to submit additional information. Please see the list of items below.
- Recommend Denial. See comments below.

**Please note the following information:**

- A Final Lake or Streambed Alteration Agreement (1600-2016-0158) has been issued to the applicant.
- The project is located in/near Northern Spotted Owl (*Strix occidentalis caurina*, a State- and Federally-Threatened species) potential habitat. CDFW requests, prior to Project approval, protocol level surveys (two-year) by an experienced wildlife biologist, to determine whether the area has NSO presence; OR assume presence and avoid disturbance of habitat as determined by a qualified biologist, in consultation with CDFW and the US Fish and Wildlife Service.
- Prohibition on use of synthetic netting. To minimize the risk of wildlife entrapment, Permittee shall not use any erosion control and/or cultivation 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.
- Leave wildlife unharmed. If any wildlife is encountered during the Authorized Activity, Permittee shall not disturb the wildlife and shall allow wildlife to leave the work site unharmed.
- The environmental impacts of improper waste disposal are significant and well documented. CDFW requests, as a condition of Project approval, that all refuse be contained in wildlife proof storage containers, at all times, and disposed of at an authorized waste management facility.



- ☒ The referral materials state that there is a plan to construct a rainwater catchment pond onsite. CDFW requests:
  - CDFW requests, that the pond be designed to hold no more than the necessary volume of water needed for the project, with consideration to evaporative loss and designed in such a way to accommodate annual pond dewatering. The volume of water contained within the pond should be based on the square footage and method of cultivation in use prior to January 1, 2016.
  - That the applicant install an overflow spillway that will withstand a 100-year flood event, designed with a dispersal mechanism, or low-impact design, that discourages channelization and promotes dispersal and infiltration of flows to prevent surface overflow from reaching waters of the State. CDFW recommends the spillway be designed and placed to allow for a minimum of two-feet of freeboard.
  - That the applicant install several exit ramps to prevent wildlife entrapment. Exit ramps shall meet the following requirements: installed at no greater than 2:1 slope, securely fixed at the upslope end, made of solid material (e.g. wood).
  - That the applicant comply with the CDFW Bullfrog Management Plan provided with the Final LSA Agreement (1600-2016-0158).
  - That fish stocking be prohibited without written permission from the Department pursuant to Section 6400 of the Fish and Game Code.
- ☒ Human induced noise pollution may adversely affect wildlife species in several ways including abandonment of territory, loss of reproduction, auditory masking (inability to hear important cues and signals in the environment), hindrance to navigation, and physiological impacts such as stress, increased blood pressure, and respiration. To avoid disturbance, CDFW requests, as a condition of project approval, the construction of noise containment structures for all generators and fans on the parcel; noise released shall be no more than 50 decibels measured from 100ft.
- ☒ This project has the potential to affect sensitive fish and wildlife resources such as Northern Spotted Owl (*Strix occidentalis caurina*), Willow Flycatcher (*Empidonax traillii*), Chinook Salmon (*Oncorhynchus tshawytscha*), Steelhead Trout (*O. mykiss*), Coastal rainbow trout (*O. mykiss irideus*), Pacific Lamprey (*Entosphenus tridentatus*), Inland Threespine Stickleback (*Gasterosteus aculeatus microcephalus*), Foothill Yellow-legged Frog (*Rana boylei*), Pacific Giant Salamander (*Dicamptodon tenebrosus*), Southern Torrent Salamander (*Rhyacotriton variegatus*), Rough-skinned Newt (*Taricha granulosa*), Tailed Frog (*Ascaphus truei*), Western Pond Turtle (*Actinemys marmorata marmorata*), and amphibians, reptiles, aquatic invertebrates, mammals, birds, and other aquatic and riparian species.

Thank you for the opportunity to comment on this Project. Please send all inquiries regarding these comments to [kalyn.bocast@wildlife.ca.gov](mailto:kalyn.bocast@wildlife.ca.gov).

Please confirm that you have received this email.

Sincerely,

California Department of Fish and Wildlife  
619 2nd Street  
Eureka, CA 95501

**ATTACHMENT 4**

**REFERRAL AGENCY COMMENTS AND RECOMMENDATIONS**

The project was referred to the following referral agencies for review and comment. Those agencies that provided written comments are checked off.

<b>Referral Agency</b>	<b>Response</b>	<b>Recommendation</b>	<b>Location</b>
Building Inspection Division	✓	Approval	On file with Planning
Public Works Land Use Division	✓	Conditional approval	On file with Planning
Health and Human Services Environmental Health Division	✓	Conditional Approval	On file with Planning
Cal Fire	✓	Conditional Approval	On file with Planning
Department of Fish and Wildlife	✓	Conditional Approval	On file with Planning
NWIC	✓	Recommends further study	On file with Planning
Bear River Band Rohnerville Rancheria	✓	Conditional Approval	On file with Planning
Sinkyone Intertribal Wilderness Council	✓	No response	
North Coast Regional Water Quality Control Board		No response	
North Coast Unified Air Quality Management District		No response	
Humboldt County District Attorney		No response	
Humboldt County Agricultural Commission		No response	
State Water Resources Control Board – Water Rights Division		No response	
Humboldt County Sheriff		No response	
Garberville Fire Protection District		No response	
Southern Humboldt Joint Unified School District		No response	