

**SUPPLEMENTAL INFORMATION #1**

For Planning Commission Agenda of:  
October 21, 2021

<input checked="" type="checkbox"/>	Consent Agenda Item	
<input type="checkbox"/>	Continued Hearing Item	<b>Nos. F-11</b>
<input type="checkbox"/>	Public Hearing Item	
<input type="checkbox"/>	Department Report	
<input type="checkbox"/>	Old Business	

**Re: Redwood Valley Farms, LLC, Conditional Use Permit and Special Permit**

Record Number: PLN-12310-CUP

Assessor Parcel Number: 316-174-010

Section 24 of Township 06 North, Range 03 East, H.B.&M., Titlow Hill area

Attached for the Planning Commission's record and review are a revised resolution and public comments and staff response that was not included in the staff report for the hearing:

1. A revised resolution clarifying the slopes of the cultivation area, watershed where the project is located, the permit cap in the watershed and number of permits processed thus far. This revision does not change any recommendations for findings by staff.
2. Public comments from Marisa Duprino dated October 19, 2021, and staff responses to comments for Redwood Valley Farms, LLC.

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

**Resolution Number: 21-  
Record Number: PLN-12310-CUP  
Assessor's Parcel Number: 316-174-010**

**Resolution by the Planning Commission of the County of Humboldt certifying compliance with the California Environmental Quality Act and conditionally approves the Redwood Valley Farms, LLC, Conditional Use Permit and Special Permit request.**

**WHEREAS, Redwood Valley Farms, LLC,** submitted an application and evidence in support of approving a Conditional Use Permit for the continued operation of an existing 14,810 square foot (SF) outdoor cannabis cultivation, with appurtenant propagation and processing activities. Annual water use is 217,900 gallons and there will be a total of 422,500 gallons of water storage on-site. A Special Permit is also being requested for the use and maintenance of a point of diversion; and

**WHEREAS,** the County Planning Division, the lead agency, prepared an Addendum to the Final Mitigated Negative Declaration (MND) prepared for the Commercial Medical Marijuana Land Use Ordinance (CMMLUO) adopted by the Humboldt County Board of Supervisors on January 26, 2016. The proposed project does not present substantial changes that would require major revisions to the previous Mitigated Negative Declaration. No new information of substantial importance that was not known and could not be known at the time was presented as described by §15162(c) of CEQA Guidelines; and

**WHEREAS,** the Humboldt County Planning Commission held a duly-noticed public hearing on October 21, 2021, and reviewed, considered, and discussed the application for a Conditional Use Permit and Special Permit, and reviewed and considered all evidence and testimony presented at the hearing.

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

1. **FINDING:** **Project Description:** The application is a Conditional Use Permit to allow an existing 14,810 square foot (SF) outdoor cannabis cultivation, with appurtenant propagation and processing activities. Power is provided by solar, with two (2) generators utilized for drying, curing, and supplemental domestic uses. There are long-term plans to incorporate additional solar power or connect to Pacific Gas and Electric Company (PG&E) in the future. Water for irrigation is provided by a stream diversion and a rainwater catchment pond. Annual water use is 217,900 gallons and there will be 422,500 gallons of water storage on-site. A Special Permit is also being requested for the use and maintenance of a point of diversion,

**EVIDENCE:** a) Project File: PLN-12310-CUP

2. **FINDING:** **CEQA.** The requirements of the California Environmental Quality Act have been complied with. The Humboldt County Planning Commission has considered the Addendum to and the Mitigated Negative Declaration (MND) prepared for the Commercial Medical Marijuana Land Use Ordinance (CMMLUO) adopted by the Humboldt County Board of

Supervisors on January 26, 2016.

**EVIDENCE:**

- a) Addendum prepared for the proposed project.
- b) The proposed project does not present substantial changes that would require major revisions to the previous MND. No new information of substantial importance that was not known and could not be known at the time was presented as described by §15162(c) of CEQA Guidelines.
- c) A Water Resources Protection Plan (WRPP) and Notice of Applicability was prepared by the applicant to show compliance with the Regional Water Board and State Water Board Cannabis General Order for Waste Discharge. The project is conditioned to prepare and submit a Site Management Plan (SMP).
- d) California Department of Fish and Wildlife Resource Maps indicate no Special Status species are known to occur within the project area. A review of the California Natural Diversity Database (CNDDDB) Spotted Owl Observation Database in July 2021 showed that Northern Spotted Owl habitat exists in the vicinity and the nearest positive sighting is 0.31 miles from the project area, with the nearest activity center located approximately 0.83 miles from the project area. Conditions of approval will require noise to be at below 50 decibels at 100 feet which is below the guidance established by the California Department of Fish and Wildlife for protection of the species.
- e) No net loss of timberland after the environmental baseline of December 31, 2015, would occur under the project. A Less Than Three Acre Conversion Exemption was issued by the California Department of Forestry and Fire Protection (CAL FIRE) in February 2016 for 2.5 acres of timberland conversion. As such timber conversion onsite was performed under the Less Than Three Acre Conversion Exemption and, per review of aerial imagery dating back to 2004, no additional timber conversion appears to have occurred on the subject property. However, a small section of the eastern conversion area, within the southernmost portion of the conversion area, occurred within the Streamside Management Area (SMA) of an onsite stream (Windy Creek). As a result, in order to mitigate for impacts to the SMA, the project is conditioned to retain a Registered Professional Forester (RPF) to evaluate the portion of the conversion area that occurred within the SMA and prepare a Restocking Plan monitoring plan for three (3) years which includes performance evaluations, performance standards, and contingency measures should performance standards not be met.
- f) The Cultural Resources referral process carried out by staff concluded that the proposed project will not result in any adverse changes to historical or archaeological resources and recommended Inadvertent Discoveries Protocol.
- g) A Road Evaluation Report for a 3.3-mile segment of Lower Sabertooth Road (labeled as "Saber Tooth Road" in the Road Evaluation Report) from Highway 299 to the subject property was prepared by DTN Engineering and Consulting in January 2018, which indicates that the roadway is not developed to the equivalent of a road Category 4 standard or better. However, per Part B of the Road Evaluation Report, the road is considered

very low volume and can accommodate the cumulative increased traffic from this project and all known cannabis projects, if the recommendations in the Roadway Evaluation Report are implemented, which is included as a condition of approval. In addition, due to the number of cultivation projects along Lower Sabertooth Road, both approved and pending, conditions of approval require the applicant to take steps to form a Road Maintenance Association for the maintenance of Lower Sabertooth Road. As conditioned, the access roads are suitable for safe access to a from the project site.

### **FINDINGS FOR CONDITIONAL USE PERMIT AND SPECIAL PERMIT**

- 3. FINDING** The proposed development is in conformance with the County General Plan, Open Space Plan, and the Open Space Action Program.
- EVIDENCE**
- a) General agriculture is a use type permitted in the Agricultural Grazing (GA) land use designation. 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. The use of an agricultural parcel for commercial agriculture is consistent with the Open Space Plan and Open Space Action Program. Therefore, the project is consistent with and complimentary to the Open Space Plan and its Open Space Action Program.
- 4. FINDING** The proposed development is consistent with the purposes of the existing U zone in which the site is located.
- EVIDENCE**
- a) The Unclassified or U Zone is intended to be applied to areas of the County in which general agriculture residential uses are the desirable predominant uses.
  - b) All general agricultural uses are principally permitted in the U zone.
  - c) Humboldt County Code section 314-55.4.8.2.2 allows cultivation of up to 43,560 square feet of existing outdoor cannabis and up to 22,000 square feet of existing mixed-light cannabis on a parcel over 1 acre subject to approval of a Conditional Use Permit and a determination that the cultivation was in existence prior to January 1, 2016. The application for 14,810 square feet of outdoor cultivation on a 40-acre parcel is consistent with this and with the cultivation area verification prepared by the County.
  - d) Conditions of approval require the applicant to adhere to and implement the projects and recommendations contained in the Final SAA and provide evidence to the Planning Department that the projects included in the Final SAA are completed to the satisfaction of CDFW. By adhering to the terms and conditions of the FSAA, which limits the diversion amount and duration in addition to the specifying the use of intake structures that will not impact aquatic species, impacts to the SMA are minimized.
- 5. FINDING** The proposed development is consistent with the requirements of the CMMLUO Provisions of the Zoning Ordinance.
- EVIDENCE**
- a) The CMMLUO allows existing cannabis cultivation to be permitted in areas zoned U (HCC 314-55.4.8.2.2).

- b) The parcel was created in compliance with all applicable state and local subdivision regulations, as it was created in its current configuration by patent (Patent No. 867174) dated June 10, 1922, before the establishment of county and state subdivision regulations that would have applied to the creation of the parcel.
- c) Water for irrigation is provided by a water diversion on a Class II tributary stream to Windy Creek and a 390,000-gallon rainwater catchment pond on the subject parcel. Conditions of approval require the applicant to adhere to all terms and conditions of the CDFW FSAA and monitor water use from the stream diversion, storage tanks, and rainwater catchment pond annually to demonstrate there is sufficient water available to continue to meet operational needs.
- d) A Road Evaluation Report for a 3.3-mile segment of Lower Sabertooth Road (labeled as "Saber Tooth Road" in the Road Evaluation Report) from Highway 299 to the subject property was prepared by DTN Engineering and Consulting in January 2018, which indicates that the roadway is not developed to the equivalent of a road Category 4 standard or better. However, per Part B of the Road Evaluation Report, the road is considered very low volume and can accommodate the cumulative increased traffic from this project and all known cannabis projects, if the recommendations in the Roadway Evaluation Report are implemented, which is included as a condition of approval. In addition, due to the number of cultivation projects along Lower Sabertooth Road, both approved and pending, conditions of approval require the applicant to take steps to form a Road Maintenance Association for the maintenance of Lower Sabertooth Road. As conditioned, the access roads will be functionally appropriate for the expected traffic.
- e) ~~The slope of the land where cannabis will be cultivated is less than 50%.~~ **A review of the Humboldt County WebGIS shows the slopes on the subject parcel range from less than 15% to 50% with the cultivation area mapped as having naturally occurring slopes of 15% - 30%. According to the Water Resources Protection Plan (WRPP) prepared by Timberland Resource Consultants dated August 21, 2016, the cultivation sites were located on slopes of less than 30%. The applicant relocated two smaller cultivation sites that were located on slopes ranging from 20% - 30% to a centralized location where slopes are 15% or less as described the WRPP.**
- f) The cultivation of cannabis will not result in the net conversion of timberland. A Less Than Three Acre Conversion Exemption was issued by the California Department of Forestry and Fire Protection (CAL FIRE) in February 2016 for 2.5 acres of timberland conversion. As such timber conversion onsite was performed under the Less Than Three Acre Conversion Exemption and, per review of aerial imagery dating back to 2004, no additional timber conversion appears to have occurred on the subject property. However, a small section of the eastern conversion area, within the southernmost portion of the conversion area, occurred within the Streamside Management Area (SMA) of an onsite stream (Windy Creek). As a result, in order to mitigate for impacts to the SMA, the project is conditioned to retain a Registered Professional Forester (RPF) to evaluate the portion of the conversion area that occurred within the SMA and prepare a Restocking

Plan monitoring plan for three (3) years which includes performance evaluations, performance standards, and contingency measures should performance standards not be met.

- g) The location of the cultivation complies with all setbacks required in Section 314-55.4.11.d. It is more than 30 from any property line, more than 300 feet from any off-site residence, more than 600 feet from any school, church, public park or Tribal Cultural Resource.

**6. FINDING**

The cultivation of ~~21,150~~ **14,810** square feet of cannabis cultivation and the conditions under which it may be operated or maintained will not be detrimental to the public health, safety, or welfare or materially injurious to properties or improvements in the vicinity.

**EVIDENCE**

- a) The site is located on road that has been certified to safely accommodate the amount of traffic generated by the proposed cannabis cultivation.
- b) The site is in a rural part of the County where the typical parcel size is over 40 acres and many of the land holdings are very large. The proposed cannabis will not be in a location where there is an established neighborhood or other sensitive receptor such as a school, church, park or other use which may be sensitive to cannabis cultivation. Approving cultivation on this site and the other sites which have been approved or are in the application process will not change the character of the area due to the large parcel sized in the area.
- c) The location of the proposed cannabis cultivation is more than 300 feet from the nearest off-site residence.
- d) Irrigation water will come from a stream diversion that has been registered with the State Water Resources Control Board (SWRCB) and California Department of Fish and Wildlife (CDFW) and a rainwater catchment pond. As a condition of approval, the applicant shall obtain a Right to Divert and Use Water from the SWRCB.
- e) Provisions have been made in the applicant's proposal to protect water quality and thus runoff to adjacent property and infiltration of water to groundwater resources will not be affected.
- f) In order to mitigate for impacts to the SMA, the project is conditioned to retain a Registered Professional Forester (RPF) to evaluate the portion of the conversion area that occurred within the SMA and prepare a Restocking Plan monitoring plan for three (3) years which includes performance evaluations, performance standards, and contingency measures should performance standards not be met.

**7. FINDING**

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

**EVIDENCE**

- a) The parcel was not included in the housing inventory of Humboldt County's 2019 Housing Element but is currently developed with an existing residence. The approval of cannabis cultivation on this parcel will not conflict with the ability for the existing residence to continue to be utilized on this parcel.

**8. FINDING**

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

**EVIDENCE**

- a) ~~The project site is located in the Middle Main Eel Planning Watershed, which under Resolution 18-43 is limited to 360 permits and 125 acres. Approval of this application would result in 74 approved permits for a total of 33.4 acres.~~  
**The project site is located in the Redwood Creek Planning Watershed, which under Resolution 18-43 is limited to 141 permits and 49 acres of cultivation. With the approval of this project the total approved permits in this Planning Watershed would be 11 permits and the total approved acres would be 3.16 acres of cultivation.**

**DECISION**

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

- Adopt the findings set forth in this resolution; and
- Conditionally approves the Conditional Use Permit and Special Permit for Redwood Valley Farms, LLC, based upon the Findings and Evidence and subject to the conditions of approval attached hereto as Attachment 1 and incorporated herein by reference; and

Adopted after review and consideration of all the evidence on October 21, 2021.

The motion was made by COMMISSIONER \_\_\_\_\_ and second by COMMISSIONER \_\_\_\_\_ and the following ROLL CALL vote:

AYES: COMMISSIONERS:

NOES: COMMISSIONERS:

ABSENT: COMMISSIONERS:

ABSTAIN: COMMISSIONERS:

DECISION:

I, John 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 Ford, Director  
 Planning and Building Department

**From:** [Megan Marruffo](#)  
**To:** [Jeff and Marisa St John](#)  
**Cc:** [John](#); [planningclerk@co.humboldt.ca.us](mailto:planningclerk@co.humboldt.ca.us); [Cliff Johnson <CJohnson@co.humboldt.ca.us>](mailto:Cliff.Johnson@co.humboldt.ca.us); [Meghan Ryan](#)  
**Subject:** RE: October 21 Planning Commission Public Comments  
**Date:** Wednesday, October 20, 2021 2:59:31 PM

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Good afternoon, Marisa,

Thank you for providing comments on projects scheduled for hearing at tomorrow night's Planning Commission meeting. Your comments will be provided to the Planning Commission for their consideration.

I am the assigned Planer for Redwood Valley Farms, LLC, and I will do my best to respond to your comments. Please see my responses in red following your comments.

1. Inadequate Access - Road from Highway 299 to and through Sabertooth Rd does not meet or exede Category 4 requirements (as stated by both the Private Contractor's December 2018 Road Evaluation and the County's that was completed in April 2018 for the proposed Titlow Hill Subdivision).

1.1 Staff Report states that "The site is located on road (insert - Sabertooth) that has been certified to safely accommodate the amount of traffic generated by the proposed cannabis cultivation." However, the Private Contractor who did the certification manually counted cars in January (when there is no or very low cannabis activity) to derive the Average Daily Traffic.

The CMMLUO does not require that cultivation sites be located on roads meeting or exceeding the Category 4 road standard. However, roads need to be able handle the traffic from the project and allow for emergency vehicles to access the site. The Road Evaluation Report prepared by DTN Consulting dated January 1, 2018, finds that the recommended improvements to the roadway, in addition to formation of a Road Maintenance Association, will ensure the access road can accommodate the proposed traffic for this project, nearby (cumulative traffic), and emergency vehicles. The Road Evaluation Report was stamped and signed by David Nicoletti, P.E. (Registered Professional Engineer). The ability of the access road to accommodate traffic and emergency vehicles was confirmed again on October 1, 2021, when we reached out directly to the preparer of the report.

1.2 The Private Contractor did not certify that the road from Highway 299, nor the second access point (the rest of Sabertooth Road to Titlow Hill) which is required by CalFire (refer to the proposed Titlow Hill Subdivision documentation).

The applicant is required to provide a Road Evaluation Report for the main access to the property. A secondary access to the property is not authorized by this permit.

2. The Water Resource Protection Plan was performed in 2016 - Significant drought impacts have been identified since then so that plan might no longer be valid.

The Water Resources Protection Plan (WRPP) was used for staff analysis as it includes parcel specific



information regarding slopes and improvements, for example. As of 2018, the Regional Water Quality Control Board policy migrated under the State Water Resources Control Board (SWRCB) and updated regulations were released that require all cultivators to meet the requirements of the State Cannabis Cultivation Program, which includes provisions for water use and storage. Attachment 3 of the staff report includes a Notice of Applicability demonstrating the applicant has enrolled in the State Program. The applicant is required to submit a copy of the Site Management Plan to the Planning Department and adhere to all requirements of the State Water Board. The Site Management Plan is the "new" WRPP.

3. No Road Maintenance Association has been created in accordance to Ord 2599 CCLUO [Inland] states that "Where three or more permit applications have been filed for Commercial Cannabis Activities on parcels served by the same shared private road system, the owner of each property must consent to join or establish the appropriate Road Maintenance Association (RMA) \*\*\*prior\*\*\* (emphasis added) to operation or provisional permit approval." The County's Permitting System shows three cannabis applications for Sabertooth (Saber Tooth) Rd (316-174-010, 316-172-020, and 316-174-008).

Condition #14 requires the applicant to join or form a Road Maintenance Association (RMA) for Lower Sabertooth Road and demonstrate annually they are an active participant in the RMA. Should the applicant be unable to join or form a RMA, they are responsible for paying fair-share costs into road maintenance annually.

4. There is no analysis of the Vehicle Miles Traveled required by CEQA for the applicant and his "up to 10 employees."

Since the project was in existence prior to 2016, it was considered under the Mitigated Negative Declaration (MND) prepared for the CMMLUO ordinance.

5. Cultivation Slope is higher than 15% - County Ordinance 2599 CCLUO [Inland] states "55.4.6.4.1 Slope Cultivation Site(s) must be confined to areas of the Parcel where the Slope is 15 percent or less."

Staff Report states that it will be "less than 50 percent" and the Commercial Cannabis Application Plan states that the slope is ">15% in most cultivation areas."

The CCLUO (or 2.0) section you are referring to is required for new cultivation sites. The proposed project is an existing site and is being processed under the CMMLUO (or 1.0). Although there are no requirements for slopes for existing operations in the CMMLUO, the operation is expected to comply with the State Water Board Cannabis Cultivation Policy, which limits slopes to 30%. A review of the Humboldt County WebGIS shows the slopes on the subject parcel range from less than 15% to 50% with the cultivation area mapped as having naturally occurring slopes of 15% - 30%. According to the Water Resources Protection Plan (WRPP) prepared by Timberland Resource Consultants dated August 21, 2016, the cultivation sites were located on slopes of less than 30%. The applicant relocated two smaller cultivation sites that were located on slopes ranging from 20% - 30% to a centralized location where slopes are 15% or less as described the WRPP. This information will be added to the findings for the project for clarification.

6. Property is Was Placed in the Wrong Watershed for the County Permit and Acreage Limitations Calculation

6.1 Staff Report "FINDING Approval of the project is consistent with Humboldt County Board of Supervisors Resolution No. 18-43 which established a limit on the number of permits and acres which may be approved in each of the County's Planning Watersheds." The associated supporting documentation is not presented. In addition, the Staff Report states that "EVIDENCE The project site is located in the Middle Main Eel Planning Watershed, which under Resolution 18-43 is limited to 360 permits and 125 acres. Approval of this application would result in 74 approved permits for a total of 33.4 acres."

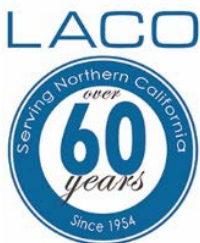
6.2 Said property is actually in the Redwood Creek watershed that has a limit of "141 permits and 49 acres."

Thank you for this comment. A revised resolution is being provided to the Planning Commission that updates this information for the Redwood Creek watershed. Approval of this application would be under the permit cap for the watershed.

7. The County did not provide a CEQA Cumulative Impact Analysis related to this application and the surrounding area (other cannabis grows, homes, etc.).

Staff prepared an addendum to the Mitigated Negative Declaration (MND) prepared for the ordinance stating that the project does not have any new impacts that were not previously considered. Overall, there is a net improvement to baseline environmental conditions associated with permitting of this site, as the project will be required to comply with the requirements of the CMMLUO and meet the conditions of approval.

Thank you,  
Megan



Megan Marruffo  
Senior Planner / Project Manager  
LACO Associates  
Eureka | Ukiah | Santa Rosa | Chico  
*Advancing the quality of life for generations to come*  
707 443 5054  
<http://www.lacoassociates.com>

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**From:** Jeff and Marisa St John <upperredwoodcreek@gmail.com>

**Sent:** Wednesday, October 20, 2021 4:47 AM

**To:** [planningclerk@co.humboldt.ca.us](mailto:planningclerk@co.humboldt.ca.us)

**Cc:** Megan Marruffo <[marruffom@lacoassociates.com](mailto:marruffom@lacoassociates.com)>; John <[jford@co.humboldt.ca.us](mailto:jford@co.humboldt.ca.us)>

**Subject:** October 21 Planning Commission Public Comments

Hello,

Please consider these Public Comments in the decisions that you make in your Planning Commission October 21 meeting:

Do not approve new cannabis grows or additions to existing ones ( 12333, 11786, 16774) for these reasons:

1. The County is in a drought
2. The County recently added \$1M for cannabis grant's because current growers say that their businesses are in crisis due to falling prices
3. The County is not tallying estimated water usage, acreage, etc. so there is no way to analyze cumulative impact to communities or watersheds.

Do not reduce setbacks to the Public Lands ( 12333, 13037, 21-11892), instead have applicants revise their plans to stay within the setback requirement.

Do not allow work within Work Within Streamside Management Area (21-12125 and 11503), instead have applicants revise their plans to work outside that area.

Deny 21-12310 Redwood Valley Farms (Titlow Hill) cannabis application - following reasons:

1. Inadequate Access - Road from Highway 299 to and through Sabertooth Rd does not meet or exede Category 4 requirements (as stated by both the Private Contractor's December 2018 Road Evaluation and the County's that was completed in April 2018 for the proposed Titlow Hill Subdivision).

1.1 Staff Report states that "The site is located on road (insert - Sabertooth) that has been certified to safely accommodate the amount of traffic generated by the proposed cannabis cultivation." However, the Private Contractor who did the certification manually counted cars in January (when there is no or very low cannabis activity) to derive the Average Daily Traffic.

1.2 The Private Contractor did not certify that the road from Highway 299, nor the second access point (the rest of Sabertooth Road to Titlow Hill) which is required by CalFire (refer to the proposed Titlow Hill Subdivision documentation).

2. The Water Resource Protection Plan was performed in 2016 - Significant drought impacts have been identified since then so that plan might no longer be valid.

3. No Road Maintenance Association has been created in accordance to Ord 2599 CCLUO [Inland] states that "Where three or more permit applications have been filed for Commercial Cannabis Activities on parcels served by the same shared private road system, the owner of each property must consent to join or establish the appropriate Road Maintenance Association (RMA) \*\*\*prior\*\*\* (emphasis added) to operation or provisional permit approval." The County's Permitting System shows three cannabis applications for Sabertooth (Saber Tooth) Rd (316-174-010, 316-172-020, and 316-174-008).

4. There is no analysis of the Vehicle Miles Traveled required by CEQA for the applicant and his "up to 10 employees."

5. Cultivation Slope is higher than 15% - County Ordinance 2599 CCLUO [Inland] states "55.4.6.4.1 Slope Cultivation Site(s) must be confined to areas of the Parcel where the Slope is 15 percent or less."

Staff Report states that it will be "less than 50 percent" and the Commercial Cannabis Application Plan states that the slope is ">15% in most cultivation areas."

6. Property is Was Placed in the Wrong Watershed for the County Permit and Acreage Limitations Calculation

6.1 Staff Report "FINDING Approval of the project is consistent with Humboldt County Board of Supervisors Resolution No. 18-43 which established a limit on the number of permits and acres which may be approved in each of the County's Planning Watersheds." The associated supporting documentation is not presented. In addition, the Staff Report states that "EVIDENCE The project site is located in the Middle Main Eel Planning Watershed, which under Resolution 18-43 is limited to 360 permits and 125 acres. Approval of this application would result in 74 approved permits for a total of 33.4 acres."

6.2 Said property is actually in the Redwood Creek watershed that has a limit of "141 permits and 49 acres."

7. The County did not provide a CEQA Cumulative Impact Analysis related to this application and the surrounding area (other cannabis grows, homes, etc.).

Thank you for your consideration of these concerns.

Regards,  
Marisa Darpino  
District 5

Titlow Hill

xxxxx

xxxHow much of the taxpayer money is being spent on this project outsourcing its review by LACO?