




COUNTY OF HUMBOLDT

AGENDA ITEM NO.
I6

For the meeting of: July 10, 2018

Date: May 31, 2018

To: Board of Supervisors

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

Subject: OR-17-005 Zoning Ordinance Amendments to Allow Greenhouse Floors on Prime Agricultural Soils

RECOMMENDATION(S):

That the Board of Supervisors:

1. Withdraw the proposed Ordinance Amendments No. 17-005, Greenhouse Floors, from consideration.

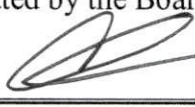
SOURCE OF FUNDING:

The funding for this work is included is in the General Fund contribution to the Long Range Planning unit, 1100-282.

DISCUSSION:

The proposed Zoning Amendments OR-17-005 to allow improved floors and footpaths in greenhouses on prime agricultural soils was initiated by the Board of Supervisors based on a

Prepared by Mary Milner

CAO Approval 

REVIEW:	Auditor _____	County Counsel <u>JH</u>	Human Resources _____	Other _____
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TYPE OF ITEM:

Consent

Departmental

Public Hearing

Other _____

BOARD OF SUPERVISORS, COUNTY OF HUMBOLDT

Upon motion of Supervisor Fannell Seconded by Supervisor Wilson

Ayes Bass, Fannell, Bohn, Wilson

Nays _____

Abstain _____

Absent Sundberg

PREVIOUS ACTION/REFERRAL:

Board Order No. _____

Meeting of: _____

and carried by those members present, the Board hereby approves the recommended action contained in this Board report.

Dated: 7/10/18

By: 

Kathy Hayes, Clerk of the Board

request from a cannabis applicant. Staff is recommending that this initiative be withdrawn by the Board of Supervisors because of the policy implications created by the proposed ordinance, the changes to the Commercial Cannabis Land Use Ordinance not to require cannabis cultivation on prime soils, and the fact that the applicant who approached the Board for this amendment has withdrawn their project.

A draft ordinance was prepared for both the inland and coastal areas and presented to Coastal Commission (CC) staff for review and comment. The Coastal Commission staff expressed significant policy concerns with the proposed ordinance. The Planning Commission (PC) then considered the proposed ordinance at a public hearing on December 14, 2017. The Planning Commission was concerned about the policy direction to allow floors in greenhouses on prime farmland, and also wanted to better address the concerns of the Coastal Commission Staff. The Planning Commission directed staff to incorporate recommendations from the Coastal Commission, then return with modifications.

Policy Concerns

Planning staff drafted and circulated modifications to the draft ordinance, which triggered a second round of comments from the Coastal Commission staff. The main concerns are that (1) the covering of prime agricultural soil with a floor, even a temporary raised floor, runs counter to policy to protect prime soils for agricultural purposes; (2) the use of prime agricultural land for non-soil dependent activities is counter to the policies to protect prime soils for soil dependent agricultural uses; and (3) the ordinance could cause proliferation of floored greenhouses, either inland or in coastal areas. The Coastal Commission staff is concerned about the possible effects of proliferation on agricultural productivity and scenic views in the coastal zone.

Categorical Exclusion E-86-4

Possibly the most significant comment offered by the Coastal Commission involves the interaction of the proposed Ordinance with Categorical Exclusion Order E-86-4 (the Order). The Order is an agreement made by the Coastal Commission in 1986 to waive the requirement for a Coastal Development Permit (CDP) for certain types of development. One type of development that falls under the Order is greenhouses. The Order makes direct reference to the part of the Coastal Zoning Ordinance (CZR) that would be amended, making the two functionally connected. In other words, amending the zoning ordinance could result in the Coastal Commission wanting to amend the Categorical Exclusion Order. This amendment would affect more than cannabis applications. The result could be the loss of the CDP waiver for agricultural structures in the Coastal Zone. Staff has concerns with opening the Categorical Exclusion order in exchange for allowing floors in greenhouses.

The revised Ordinance is included as Attachment 1; Coastal Commission comment letters can be found in Attachments 2 and 3; Attachment 4 is the Coastal Commission's Categorical Exclusion Order E-86-4.

Demand for Floored Greenhouses

Meanwhile, adoption of the Cannabis Land Use Ordinance on May 8, 2018 negates one of the main purposes of amending the Greenhouse Floor Ordinance. Cannabis cultivation is now

allowed on non-prime agricultural soils. Cultivators may now build a floored greenhouse on non-prime agricultural soil, reducing the need for this ordinance. In addition the applicant who initially requested this amendment has withdrawn their application. There is no longer a desire by any applicant for this ordinance.

Conclusion

The proposed ordinance poses significant policy concerns which make it a controversial ordinance to pursue. This is reflected by the concerns expressed by both the Planning Commission and Coastal Commission Staff. This in addition to the fact that the need for the ordinance no longer exists, makes it prudent to stop work on this ordinance.

Section 312-50 of the Humboldt County Code specifies the findings that must be made in order to approve a zoning ordinance amendment. These findings are:

1. The proposed change is in the public interest; and
2. The proposed change is consistent with the General Plan; and
3. If the amendment requires a Local Coastal Plan Amendment, the amendment is in conformity with the policies of Chapter 3 (commencing with Section 30200) of the Coastal Act.

It is unlikely that an ordinance will be developed which will adequately meet all three requirements. It is clear this is a change that is full of negative policy implications and controversy. Given that the demand is no longer strong, it is appropriate to reconsider whether to pursue this direction. In light of all evidence, and public and agency comments received, staff recommends the Board withdraw the proposed Ordinance No. 17-005 from further consideration at this time. Planning staff will continue in the effort to make an ordinance that is as presentable as possible if the Board directs.

FINANCIAL IMPACT:

Staff costs for preparation and review of this ordinance extension were supported by the General Fund contribution to the Planning and Building Department, Long Range Planning Unit's budget for FY 2017-18. Withdrawal of the proposed ordinance amendments removes ongoing financial impact to the current year's budget for FY 2018-19.

Withdrawal of the amendments is consistent with the Board's 2017 Strategic Framework, as it will safeguard the public trust by managing our resources to ensure sustainability of services.

OTHER AGENCY INVOLVEMENT:

The project was referred to various Tribes, and State and local agencies for comments and recommendations.

ALTERNATIVES TO STAFF RECOMMENDATIONS:

The Board may choose not to pursue an amendment in coastal zone, but to proceed with the inland amendment. This alternative would resolve the Coastal Commission issues, but the policy issues would still exist inland.

ATTACHMENTS:

The attachments supporting this report have been provided to the Board of Supervisors; copies are available for review in the Clerk of the Board's Office.

- Attachment 1 Revised Zoning Ordinance Amendments to Greenhouse Floors On Prime Agricultural Soils
- Attachment 2 California Coastal Commission Letter 12-4-17
- Attachment 3 California Coastal Commission Letter 2-16-18
- Attachment 4 Categorical Exclusion Order E-86-4
- Attachment 5 Public comments Since December 14 2017.

Attachment 1

**Revised Zoning Ordinance Amendments to Greenhouse Floors On
Prime Agricultural Soils**

NOW, THEREFORE, the Board of Supervisors of the County of Humboldt do ordain as follows:

SECTION 1. COASTAL ZONING REGULATIONS AMENDMENT. Title III, Division 1, Chapter 3, Section A, Part 1, Section 313-69.1 is hereby amended as follows:

313- 69.1.5 ACCESSORY STRUCTURES.

69.1.5.2 Greenhouses ~~, except that greenhouses with concrete slab floors shall not be located on prime agricultural soil~~ which do not result in lot coverage exceeding 4 acres on lots 20 acres or larger in size, or not exceeding 20% of the lot coverage for lots less than 20 acres in size, either individually or collectively, with or without a perimeter foundation, and without an improved floor which will preclude the agricultural use of the underlying soil. Greenhouses with an improved floor may be located on prime or non-prime agricultural soils with a Special Permit. Concrete, asphalt, and similarly constructed footpaths within a greenhouse may be permitted on prime agricultural soils with a Special Permit (Former Section CZ#A314-2(G) (2));

ADD NEW SECTIONS:

69.1.5.2.1 Special Permit Conditions. Improved floors or footpaths in greenhouses on prime agricultural soil shall meet all the following criteria: (a) be permeable to air and moisture (impermeable raised floor meets this requirement), (b) not result in significant compaction and erosion of the soil, (c) not involve significant excavation, replacement, or alteration of the soil, and (d) not involve a concrete slab in contact with the soil, or concrete perimeter design. In addition, conditions of approval shall require spent imported soil used in the greenhouse be spread over the site, tilled, and not concentrated in any area. The application for Special Permit shall include provisions to address how soil used within the greenhouse is recycled, reused, or disposed of;

69.1.5.2.2 Performance Bond. Applications for a Special Permit for improved floors or footpaths in greenhouses on prime agricultural soil shall include a plan for removal of all materials covering or contacting prime agricultural soil, and restoration of the soil to as near its original condition as possible. Applicants shall post a bond in an amount sufficient to allow the County to contract to complete the work specified in the plan in the event that the permittee fails to do so;

69.1.5.2.3 Clustering. Greenhouses and associated structures shall be clustered to retain the maximum amount of land in agricultural production or available for agricultural use. Greenhouses and associated structures shall be clustered on no more than 25% of gross acreage, to the extent feasible.

SECTION 2. INLAND ZONING REGULATIONS AMENDMENT. Title III, Division 1, Chapter 4, Section A, Part 1, Section 314-43.1 is hereby amended as follows:

314-43.1 ACCESSORY USES

43.1.3.2 Greenhouses which do not result in lot coverage exceeding 5 acres on lots 20 acres or larger in size, or exceeding 25% of the lot coverage for lots less than 20 acres in size, either individually or collectively, with or without a perimeter foundation, and without an improved floor or footpath which will preclude the agricultural use of the underlying soil. Greenhouses with an improved floor or footpath which will preclude the agricultural use of the underlying soil shall not be located on prime agricultural soil, but may be located on prime or non-prime agricultural soils with a Special Permit. Concrete, asphalt, and similarly constructed footpaths are permitted within a greenhouse located on non-prime agricultural soils, and may be permitted on prime agricultural soils with a Special Permit. (Former Section INL#316-2.1(2); Added by Ord. 2189, Sec. 1, 2/9/99)

ADD NEW SECTIONS:

43.1.3.2.1 Special Permit Conditions. Improved floors or footpaths in greenhouses on prime agricultural soil shall meet all the following criteria: (a) be permeable to air and moisture (impermeable raised floor meets this requirement), (b) not result in significant compaction and erosion of the soil, (c) not involve significant excavation, replacement, or alteration of the soil, and (d) not involve a concrete slab in contact with the soil, or concrete perimeter design. In addition, conditions of approval shall require spent imported soils used in the greenhouse be spread over the site, tilled, and not concentrated in any area. The application for Special Permit shall include provisions to address how soil used within the greenhouse is recycled, reused, or disposed of.

43.1.3.2.2 Performance Bond. Applications for a Special Permit for greenhouses with improved floors on prime agricultural soil. shall include a plan for removal of all materials covering or contacting prime agricultural soil, and restoration of the soil to as near its original condition as possible. Applicants shall post a bond in an amount sufficient to allow the County to contract to complete the work specified in the plan in the event that the permittee fails to do so.

43.1.3.2.3 Clustering. Greenhouses and associated structures shall be clustered to retain the maximum amount of land in agricultural production or available for agricultural use. Greenhouses and associated structures shall be clustered on no more than 30% of gross acreage, to the extent feasible.

SECTION 3. INLAND ZONING REGULATIONS AMENDMENT. Title III, Division 1, Chapter 4, Section A, Part 1, Section 314-69.1 is hereby amended as follows:

314-69.1 ACCESSORY STRUCTURES

69.1.1.1 Greenhouses which do not result in lot coverage exceeding 5 acres on lots 20 acres or larger in size, or exceeding 25% of the lot coverage for lots less than 20 acres in size, either individually or collectively, with or without a perimeter foundation, and without an improved floor or footpath which will preclude the agricultural use of the underlying soil. Greenhouses with an improved floor or footpath which will preclude the agricultural use of the underlying soil shall not be located on prime agricultural soils, but may be located on prime or non-prime agricultural soils with a Special Permit. Concrete, asphalt, and similarly constructed footpaths are permitted within a greenhouse located on non-prime agricultural soils, and may be permitted on prime agricultural soils with a Special Permit. (Former Section INL#316-2.1(2); Added by Ord. 2189, Sec. 1, 2/9/99)

ADD NEW SECTION:

69.1.1.2 Conditions and criteria that apply to Special Permits for improved floors in greenhouses on prime agricultural soils are enumerated in 314-43.1.3.2.1 through 43.1.3.2.3.

SECTION 4. EFFECTIVE DATE. The amendments to the Inland Zoning Code shall become effective thirty (30) days from the date of adoption.

SECTION 5. EFFECTIVE DATE. The amendment to the Coastal Zoning Code shall become effective immediately upon certification of the proposed amendment to the Local Coastal Program by the California Coastal Commission.

Attachment 2

California Coastal Commission Letter December 4, 2017

CALIFORNIA COASTAL COMMISSION

NORTH COAST DISTRICT OFFICE
 1385 EIGHTH STREET • SUITE 130
 ARCATA, CA 95521
 VOICE (707) 826-8950
 FACSIMILE (707) 826-8960



December 4, 2017

Mary Milner, Long Range Planning
 Humboldt County Planning and Building Dept.
 3015 H Street
 Eureka, CA 95501

RE: Comments on draft proposed changes to Coastal Zoning Regulations (CZR) section 313-69.1.5.2 related to allowance of greenhouses with improved floors on prime agricultural soils.

Dear Ms. Milner:

Thank you for soliciting input from the California Coastal Commission (Commission) on October 26, 2017 regarding proposed changes to the above-referenced section of the County's coastal zoning regulations (CZR). As you are aware, any changes to the CZR adopted by the County will not be effective until certified by the Commission. The standard of review that the Commission will apply to any proposed changes to the CZR is whether or not the CZR as amended would conform with and be adequate to carry out the provisions of the Land Use Plan (LUP) portion of the County's certified Local Coastal Program (LCP).¹ Please note that the following comments are provided by Commission staff; the Commission itself has not reviewed the proposed zoning code changes.

As we understand the proposal, the County is considering changes to section 313-69.1.5 of the CZR, which is the section of the code that lists the various agricultural accessory structures that may be permitted in the AE, TC, TPZ, and RA zones. One of the agricultural accessory structures currently listed in this section of the CZR is "greenhouses" of unspecified type, size and maximum lot coverage. A change that the County is considering would remove the current prohibition in section 313-69.1.5.2 that disallows greenhouses with concrete slab floors on prime agricultural soils. As proposed, such non-soil-dependent greenhouses would be allowed on prime agricultural soils with a special permit. This proposed change is significant, because the existing CZR allows concrete floors within a greenhouse only for footpaths. The proposed changes would allow "improved floors" throughout a greenhouse as long as such flooring is permeable to air and moisture (including impermeable raised floors), would not result in significant compaction and erosion of the soils, would not involve significant excavation, replacement, or alteration of the soils, and would not involve a concrete slab in contact with the soil, or concrete perimeter design. The proposed changes include requirements for applicants to plan for the ultimate removal of all materials covering or contacting prime agricultural soils and restoration of the soil "to as near its original condition as possible." The proposed changes also specify that greenhouses with improved floors shall not be considered "exempt" under the County's building code provisions.

¹ The County's LCP is comprised of an LUP component along with the CZR and zoning district maps, which implement the LUP. The Commission effectively certified the County's LCP in 1986, after certification of each of the LUPs between 1983 and 1985. The Commission refers to the certified CZR and zoning district maps as the Implementation Plan (IP).

The County has six different LUPs that the Commission has certified for the lands within the County's coastal zone.² As mentioned above, the Commission, in considering any proposed changes to the CZR, must make findings that the CZR as amended would conform with and be adequate to carry out the provisions of the LUPs. We believe that the proposed changes to the CZR that the County is considering potentially would conflict with the LUP requirements related to protection of agricultural lands and timberlands, as discussed further below. A summary of our below comments and recommendations begins on page 6 of this letter.

LCP requirements protecting prime agricultural lands and timberlands

Coastal Act section 30241, which is codified within all of the LUPs except for the TAP, protects agricultural lands and limits the conversion of agricultural lands to non-agricultural uses as follows:

The maximum amount of prime agricultural land shall be maintained in agricultural production to assure the protection of the area's agricultural economy, and conflicts shall be minimized between agricultural and urban land uses through all of the following:

- (a) By establishing stable boundaries separating urban and rural areas, including, where necessary, clearly defined buffer areas to minimize conflicts between agricultural and urban land uses.*
- (b) By limiting conversions of agricultural lands around the periphery of urban areas to the lands where the viability of existing agricultural use is already severely limited by conflicts with urban uses or where the conversion of the lands would complete a logical and viable neighborhood and contribute to the establishment of a stable limit to urban development.*
- (c) By permitting the conversion of agricultural land surrounded by urban uses where the conversion of the land would be consistent with Section 30250.*
- (d) By developing available lands not suited for agriculture prior to the conversion of agricultural lands.*
- (e) By assuring that public service and facility expansions and nonagricultural development do not impair agricultural viability, either through increased assessment costs or degraded air and water quality.*
- (f) By assuring that all divisions of prime agricultural lands, except those conversions approved pursuant to subdivision (b), and all development adjacent to prime agricultural lands shall not diminish the productivity of such prime agricultural lands.*

Section 30113 of the Coastal Act, which is codified in section 313-136 of the CZR and also is defined in each of the LUPs, defines "prime agricultural land" through incorporation-by-reference of paragraphs (1) through (4) of section 51201(c) of the California Government Code:

Prime agricultural land entails land with any of the follow characteristics: (1) a rating as class I or class II in the Natural Resource Conservation Service land use capability classifications; or (2) a rating 80 through 100 in the Storie Index Rating; or (3) the ability to support livestock used for the production of food and fiber with an annual carrying capacity equivalent to at least one animal unit per acre as defined by the United States Department of Agriculture; or (4) the ability to normally yield in a commercial bearing period on an annual basis not less than two hundred dollars (\$200) per acre of unprocessed agricultural plant production of fruit- or nut-bearing trees, vines, bushes or crops which have a nonbearing period of less than five years.

² The six different LUPs are the North Coast Area Plan (NCAP), Trinidad Area Plan (TAP), McKinleyville Area Plan (MAP), Humboldt Bay Area Plan (HBAP), Eel River Area Plan (ERAP), and South Coast Area Plan (SCAP).

The four different prongs of the above-cited definition of “prime agricultural land” relate to the value and utility of the land in terms of range of agricultural uses and productivity. Land that meets any one of the four criteria in the definition is considered “prime” under the Coastal Act and the County’s LCP.

At least two of the prongs in the above-cited definition of prime agricultural land relate directly to “prime agricultural soils” as referenced in the section 313-69.1.5.2 of the CZR, though it’s unclear from the information provided if the County defines “prime agricultural soil” consistent with the above-cited definition.³ The NRCS land use capability classification referenced in part 1 of the above-cited definition rates the utility of the land based on various physical factors (e.g., rock type, soil type, slope, erosion potential, etc.). The lower the rating the more utility the land is considered to have for various agricultural uses. Ratings of class I or II are considered “prime.” The Storie Index Rating is based on soil characteristics that govern the land’s potential utilization and productive capacity (e.g., characteristics of the soil profile, surface texture, slope, drainage, nutrient level, acidity, alkalinity, etc.) independent of other physical or economic factors that might determine the desirability of growing certain plants in a given location. According to the above-cited definition, ratings of 80 through 100 are considered “prime.” The other two prongs of the definition relate indirectly to soils, in that they pertain to the capacity of the land to (a) produce and sustain animal forage (part 3 of the definition), and (b) generate a minimum commercial revenue per acre (part 4 of the definition).

In addition to the above-cited policies that define and protect agricultural lands, each of the LUPs also include section 30243 of the Coastal Act as an LUP policy. This section of the Act reads in part:

The long-term productivity of soils and timberlands shall be protected and conversions of coastal commercial timberlands in units of commercial size to other uses...shall be limited to providing for necessary timber processing and related facilities.

Long-term soil productivity is critical to the productive capacity of an agricultural site, as the presence of nutrients, minerals, organic matter, and microorganisms directly influence the ability of soil to support plant growth. High soil productivity results in higher carbon storage and conversion to biomass. The protection of soil productivity helps maintain the long-term viability of farming, ranching, and grazing land in the coastal zone.

We believe that the proposed changes to the CZR that the County is considering would conflict with the LUP requirements cited above directing that (1) the “maximum amount of prime agricultural land shall be maintained in agricultural production...”, (2) available lands not suited for agriculture shall be developed prior to the conversion of agricultural lands, and (3) the long-term productivity of soils and timberlands shall be protected and shall not be converted to other uses (specifically with respect to converting timberlands to units of less than commercial size). Even though the County is considering the inclusion of provisions to protect prime agricultural soils from adverse effects associated with

³ Each of the LUPs and the existing CZR include a definition of “prime agricultural land” as discussed above, but none include a definition for “prime agricultural soil.” The definition of “prime agricultural land” included in each of the LUPs is slightly different than the above-cited definition. Instead of four subparts, the definition in the LUPs has five subparts. The first three subparts are consistent with the first three subparts of section 30113 of the Coastal Act. However, subparts (4) and (5) of the definition of prime agricultural land in the LUPs read as follows, inconsistent with subpart (4) of Section 30113: “...4) Land planted with fruit or nut bearing trees, vines, bushes or crops which have a non-bearing period of less than five years and which will normally return during the commercial bearing period on an annual basis from the production of unprocessed agricultural plant production not less than \$200.00 per acre. 5) land which has returned from the production of unprocessed agricultural plant products on an annual gross value of not less than \$200.00 per acre for three of the five previous years.” The definition of “prime agricultural land” included in the existing certified zoning code is consistent with section 30113 of the Coastal Act cited above.

grading, compaction, and placement of concrete on the soils in AE, TC, TPZ, and RA zones where greenhouses with improved flooring may be permitted, the proposed changes would not restrict the allowance of greenhouses in terms of greenhouse type, size, maximum lot coverage, or length of development authorization. As such, the proposed changes could result in the permitted development of greenhouses with improved floors on a majority of lands with prime agricultural soils within the AE, TC, TPZ, and RA zones within the County's CDP jurisdiction.⁴ This would have the effect of preventing the use of those valuable and limited prime agricultural soils for productive agricultural use, such as cultivation of crops and forage production, inconsistent with the LUPs and with section 30241 of the Coastal Act. Allowing greenhouses with improved floors on prime agricultural soils also conflicts with the provisions of 30241(d), which directs that available lands not suited for agriculture should be developed prior to converting such lands to other uses (e.g., to uses involving greenhouses with concrete floors, which alternatively could be sited on non-prime farmlands or other types of lands). Furthermore, with the increased permitting of non-timber-related greenhouses with improved floors on timberlands, which would be facilitated by the proposed CZR changes, the long-term productivity of timberland soils would not be protected, and timberlands potentially would be converted to areas of less than commercial size due to fragmentation resulting from greenhouse proliferation, inconsistent with section 30234 cited above.

In addition to conflicting with sections 30241 and 30243 of the Coastal Act, which are incorporated as policies of the certified LUPs, the allowance of greenhouses with improved floors would directly conflict with other LUP policies related to protection of agricultural lands. For example, the NCAP, MAP, HBAP, and ERAP all include policies that state:⁵

No greenhouse shall be approved for use on prime agricultural land, where the greenhouse has a slab foundation that would cover the underlying soil.

Although the County's proposed CZR standards would require elevation of any permitted slab foundation above the underlying soil, such a foundation still would cover and prevent the use of the underlying prime agricultural land, inconsistent with the intent of this policy.

Moreover, the focus of the existing CZR standard (and the CZR standard as proposed to be amended) on "prime agricultural *soil*" rather than "prime agricultural *land*" is inadequate to fully implement the LUP policy cited above. Unlike "prime agricultural land," the County's LCP does not currently include a definition of "prime agricultural soils."⁶ We recommend the County consider amending section 313-69.1.5.2 of the CZR to change "prime agricultural *soils*" to "prime agricultural *land*," to enable that zoning code standard to better carry out the LUP policies cited above regarding protection of prime agricultural land. The County also might consider updating the LUP definitions of "prime agricultural

⁴ The policies and standards of the County's LCP do not apply to the issuance of coastal development permits (CDPs) on lands within the Commission's retained CDP jurisdiction, though under the proposed CZR changes the County could issue Special Permits for greenhouses on such lands. There are several thousand acres of agricultural lands around Humboldt Bay and the Eel River within the Commission's CDP jurisdiction. In considering a CDP application for a greenhouse with or without improved floors on lands within the Commission's jurisdiction, the standard of review that the Commission would apply to the project would be the Coastal Act. The County's LCP may be used as guidance in the Commission's CDP application review.

⁵ See policies 3.33-B-3 of the NCAP; 3.34-B-3 of the MAP; 3.24-B-2-c of the HBAP; and 3.34-B-3 of the ERAP.

⁶ We note that the County's adopted Medical Marijuana Land Use Ordinance (Phase 4), which has been transmitted to the Commission for certification (but which currently has not been filed as a complete application), does include a definition of "prime agricultural soil." However, as noted in proposed section 313-55.4.3.6, the definitions in that section are intended to apply solely to the regulations in that section.

land” as well to ensure consistency with the definition included in the existing certified zoning code (which is fully consistent with section 30113 of the Coastal Act and the Government Code language cited above). Furthermore, the County might consider adding standards or specifications to the CZR for identifying prime agricultural land in the coastal zone that lacks the requisite land use capability classification or Storie Index rating to be considered “prime” but nonetheless is important to the local economy due to its productivity or value (e.g., subparts (3) and (4) as defined above). Together such LCP changes would enable the County to better protect prime farmland consistent with section 30241 of the Coastal Act and the certified LUPs.

The proposed changes that the County is considering also appear to conflict with policy 3.24-B-3-a of the HBAP and 3.34-C-1 of the ERAP, which designate agricultural land in the Table Bluff area for grazing purposes:

Grazing lands on Table Bluff shall be designated for agricultural use to insure availability of upland grazing sites and minimize conflicts with agriculture from conversion of these lands to other uses...

Much of the agricultural land in the Table Bluff area is classified as prime. Without standards for coverage limits of greenhouses on prime farmlands, upland grazing lands could be adversely impacted via cumulative loss and fragmentation due to greenhouse proliferation. We recommend the County consider the long-term protection of upland grazing lands given the significant inundation and saturation of agricultural bottomlands projected to increase over the coming decades with sea level rise.

Furthermore, the proposed changes potentially would conflict with the compatible use policies included in various LUPs, which specify in part:⁷

The zoning of all agricultural lands shall not permit any use that would impair the economic viability of agricultural operations on such lands; and a conditional use permit shall be required of any proposed use not directly a part of agricultural production of food or fiber on the parcel; ...

If the intent of proposed CZR changes is in part to facilitate the development of greenhouses for cannabis cultivation on prime farmlands, the County should consider whether it will require a conditional use permit (and CDP) for cannabis operations on agricultural lands in the coastal zone, as possibly required by the above-cited policy (assuming that cannabis is not appropriately classified as food or fiber). Whether or not cannabis is classified as food or fiber that may necessitate a conditional use permit for its use on agricultural lands, the County might consider adding language to the CZR and/or the LUPs to clarify cannabis’s classification as it relates to agriculture as defined in the LUPs.

Finally, we encourage the County to analyze whether these proposed changes ultimately would diminish the long-term productivity and viability of agricultural lands by changing land use patterns, increasing conflicts between agriculture and other uses, and making it difficult to keep agricultural land in production.

Relationship to Categorical Exclusion Order E-86-4

In 1986, the Commission approved Categorical Exclusion Order No. E-86-4 (hereafter “Order”). The Order exempts certain categories of development in certain geographic areas from CDP requirements. One of the categories of development covered by the Order is “agricultural accessory structures,”

⁷ See policies 3.33-B-1 of the NCAP; 3.34-B-1 of the MAP; 3.24-B-2-a of the HBAP; 3.34-B-1 of the ERAP; and 3.34-B-1 of the SCAP.

including those defined in section 313-69.1.5 (formerly A314-1 G) of the CZR. The Order applies to several thousand acres of AE lands within the County coastal zone. The Order does not apply to those AE lands or portions of AE lands located within (a) a coastal wetland; (b) 100 feet of a stream; (c) 200 feet of a coastal wetland; (d) the Commission's CDP jurisdiction; or (e) the Commission's appeal jurisdiction. All combined, the Order does not apply to several thousand acres of coastal agricultural lands, but it does apply to significant expanses of agricultural lands within the LUP planning areas.

Because the section of the CZR that the County is considering changes to is the same section of the CZR referenced in the Order, which allows for the development of agricultural accessory structures, (including greenhouses) without the need for a CDP, the proposed zoning code changes necessitate additional consideration in terms of how they may implicate the Order. We plan to provide more detailed comments in the coming weeks on issues raised by the County's proposed changes both to (1) section 313-69.1.5.2 of the CZR, and (2) the proposed cannabis coastal ordinance, in terms of how these proposed code changes may relate to the Order. We are concerned that the changes to the CZR that the County is considering may facilitate a proliferation of the development of greenhouses on coastal agricultural lands to the detriment of coastal resources, including visual resources. Each of the LUPs includes various policies to ensure that permitted development in coastal areas is sited and designed to protect the scenic views and to be visually compatible with the character of surrounding areas. Currently, much of the coastal bottomlands around the Eel River and Humboldt Bay consist of open pastures without a proliferation of greenhouses or other development.⁸ Since the Order exempts greenhouses and other agricultural accessory structures from CDP requirements, we encourage the County to carefully consider how such CZR changes may relate to future development and permitting requirements on agricultural lands covered by the Order. We encourage the County to consider whether or not changes to the Order itself may be appropriate.

Summary of comments and recommendations

1. The Commission, in considering any proposed changes to the CZR, must make findings that the CZR as amended would conform with and be adequate to carry out the provisions of the LUPs. We believe that the proposed changes to the CZR that the County is considering would conflict with the LUP requirements related to protection of prime agricultural lands and timberlands, for the reasons discussed above.
2. We recommend including additional specifications in CZR section 313-69.1.5.2 related to maximum structure size, maximum lot coverage, siting of structures (e.g., clustering of structures), and/or length of development authorization to maximize protection of farmland in general for productive agricultural use and to avoid scenarios whereby cumulatively, a proliferation of greenhouses on prime and non-prime farmlands throughout the coastal zone results in the transformation of rural open pasturelands to a structured, quasi-industrial landscape. For example, in the Marin County LCP, on land designated as Coastal Agriculture Production Zone, structures, including greenhouses, are required to be clustered together and limited to 5% of the gross acreage of a property, with the remaining acreage retained in or available for agricultural production or open space.
3. We recommend the County consider amending section 313-69.1.5.2 of the CZR to change "prime agricultural *soils*" to "prime agricultural *land*," to enable that zoning code standard to better carry out the LUP policies cited above regarding protection of prime agricultural land.

⁸ A notable exception to this is the Sun Valley bulb farm development in the Arcata Bottoms (APN 507-162-014, among others), which consists largely of prime farmland covered by greenhouses that were exempted from CDP requirements under the Order. The greenhouses cover an estimated 90% of the subject APN.

The County also might consider updating the LUP definitions of “prime agricultural land” as well to ensure consistency with the definition included in the existing CZR. Furthermore, the County might consider adding standards or specifications to the CZR for identifying prime agricultural land in the coastal zone that lacks the requisite land use capability classification or Storie Index rating to be considered “prime” (under subparts (1) and (2) of the definition) but nonetheless is important to the local economy due to its productivity or value (subparts (3) and (4) as defined above).

4. As required by the Humboldt Bay and Eel River Area Plans, we encourage the County to consider the long-term protection of upland grazing lands given the significant saturation and inundation of agricultural bottomlands projected to increase over the coming decades with sea level rise. Without standards for coverage limits of greenhouses on prime and non-prime farmlands, upland grazing lands could be adversely impacted via cumulative loss and fragmentation due to greenhouse proliferation.
5. If the intent of proposed CZR changes is in part to facilitate the development of greenhouses for cannabis cultivation on prime farmlands, the County should consider whether it will require a conditional use permit (and CDP) for cannabis operations on agricultural lands in the coastal zone, given the LUP policies requiring a use permit for “any proposed use not directly a part of agricultural production of food or fiber” (emphasis added). Whether or not cannabis is classified as food or fiber that may necessitate a conditional use permit for its use on agricultural lands, the County might consider adding language to the CZR and/or the LUPs to clarify cannabis’s classification as it relates to agriculture as defined in the LUPs.
6. We encourage the County to analyze whether these proposed changes ultimately would diminish the long-term productivity and viability of agricultural lands by changing land use patterns, increasing conflicts between agriculture and other uses, and making it difficult to keep agricultural land in production.
7. We plan to provide more detailed comments in the future on issues raised by the County’s proposed changes both to (1) section 313-69.1.5.2 of the CZR, and (2) the proposed cannabis coastal ordinance, in terms of how these proposed code changes may relate to CDP exemptions authorized by Categorical Exclusion Order E-86-4. We are concerned that the changes to the CZR that the County is considering may facilitate a proliferation of the development of greenhouses on coastal agricultural lands to the detriment of coastal resources, including visual resources. We recommend that the County to carefully consider how such CZR changes may relate to future development and permitting requirements on agricultural lands covered by the Order, and we are happy to coordinate with you further on this topic, including providing information on the amendment process for Categorical Exclusion Orders if that is something that the County is interested in pursuing.

Again, thank you for the opportunity to provide comments. We’d be happy to meet to discuss these issues further at your convenience.

Sincerely,



MELISSA B. KRAEMER
Supervising Analyst

Attachment 3

California Coastal Commission Letter February 16, 2018

CALIFORNIA COASTAL COMMISSION

NORTH COAST DISTRICT OFFICE
1385 EIGHTH STREET • SUITE 130
ARCATA, CA 95521
VOICE (707) 826-8950
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February 16, 2018

Mary Milner, Long Range Planning
Humboldt County Planning and Building Dept.
3015 H Street
Eureka, CA 95501

RE: Preliminary comments on draft revised changes to Coastal Zoning Regulations (CZR) section 313-69.1.5.2 related to greenhouses.

Dear Ms. Milner:

Once again, thank you for soliciting input from the California Coastal Commission (Commission) on February 5, 2018 regarding revised proposed changes to the above-referenced section of the County's coastal zoning regulations (CZR). As you are aware, any changes to the CZR adopted by the County will not be effective until certified by the Commission. The standard of review that the Commission will apply to any proposed changes to the CZR is whether or not the CZR as amended would conform with and be adequate to carry out the provisions of the Land Use Plan (LUP) portion of the County's certified Local Coastal Program (LCP).¹ The County has six different LUPs that the Commission has certified for the lands within the County's coastal zone.² Please note that the following preliminary comments are provided by Commission staff; the Commission itself has not reviewed the proposal.

The section of the CZR that the County is considering changes to is the section that regulates agricultural accessory structures, specifically greenhouses, in the AE, TC, TPZ, and RA zones. Currently, greenhouses are allowed as accessory structures in these zones, with the only restriction being that greenhouses with concrete slab floors are prohibited on prime agricultural soils. An applicant may obtain a Special Permit to allow concrete, asphalt, and similarly constructed footpaths within greenhouses on prime agricultural soils.

As we understand the proposal, the current draft changes to the CZR would impose lot coverage limits for greenhouses as an agricultural accessory structure, including greenhouses with and without improved floors both on lands with prime agricultural soils and on lands without prime agricultural soils. Greenhouses that do not exceed lot coverage of 4 acres on lots 20 acres or larger or that do not exceed 20% of the lot coverage for lots less than 20 acres in size could be permitted as an agricultural accessory structure. A Special Permit would be required for greenhouses with improved floors on both prime and non-prime agricultural soils. For greenhouses with improved floors on prime soils, special

¹ The County's LCP is comprised of an LUP component along with the CZR and zoning district maps, which implement the LUP. The Commission effectively certified the County's LCP in 1986, after certification of each of the LUPs between 1983 and 1985. The Commission refers to the certified CZR and zoning district maps as the Implementation Plan (IP).

² The six different LUPs are the North Coast Area Plan (NCAP), Trinidad Area Plan (TAP), McKinleyville Area Plan (MAP), Humboldt Bay Area Plan (HBAP), Eel River Area Plan (ERAP), and South Coast Area Plan (SCAP), each of which were certified by the Commission between 1983 and 1985.

conditions for protection of the underlying prime soils would be required. Finally, clustering of greenhouses and associated structures would be required to the extent feasible, with the goal of retaining the maximum amount of land in agricultural production or available for agricultural use and with a maximum clustered structure limit of no more than 30% of gross acreage, to the extent feasible.

Preliminary comments

Some aspects of these proposed changes appear to be supported by LUP policies, while other aspects of this proposal are not. First, we believe the proposed changes that would impose lot coverage limits for greenhouses in general and clustering of greenhouses and other structures are supported by LUP policies that protect agricultural lands and scenic resources. Under the existing CZR, there are no such limits specified for greenhouses or such clustering requirements. Such limits and requirements will help avoid the potential for a proliferation of greenhouses to be built across coastal farmlands in a manner that cumulatively would result in the degradation of the agricultural lands and scenic quality of rural open landscapes.

However, we recommend that the County's findings in support of these proposed CZR changes clearly explain where the proposed lot coverage thresholds are derived from and how they are consistent with LUP policies in each planning area. For example, why has the County decided on 20%-25% (and 30% for clustering of structures) rather than say 5%-10%? Why is the County using percentage of acreage thresholds rather than structure size limits, such as those prescribed for mixed-light cultivation in the current draft of Version 2.0 of the CCLUO? Do the suggested thresholds make sense for all six LUP planning areas? As the HBAP, ERAP, and SCAP all include policies that specifically prioritize grazing (at least in some areas) over other types of agricultural uses of the agricultural lands, perhaps the lot coverage thresholds should be lower in these areas.³ Given LUP policy directives to minimize risks in hazardous areas, perhaps the suggested thresholds also should be lower for flood hazard areas. Cumulatively, within each LUP planning area, what might buildout to these lot coverage thresholds look like on the landscape? We encourage the County to further analyze appropriate lot coverage limits in certain areas based on LUP land use designations (e.g., AE, AG, and AEG) and policy directives for each area plan.

The proposed change that would allow greenhouses with improved floors (not just footpaths) to be built on lands with prime agricultural soils (subject to obtaining a Special Permit) is in direct conflict with the NCAP, MAP, HBAP, and ERAP, which include a blanket prohibition on the allowance of greenhouses with slab foundations on prime agricultural land.⁴ As mentioned, the standard of review that the Commission must apply to any proposed changes to the CZR is whether or not the CZR as amended would conform with and be adequate to carry out the provisions of the LUPs. As proposed, the allowance for improved floors does not appear to conform with these LUP policies.

Effect of proposed changes on CDP exclusions under Categorical Exclusion Order E-86-4

In 1986, the Commission approved Categorical Exclusion Order No. E-86-4 (hereafter "Order"). The Order exempts certain categories of development in certain geographic areas from CDP requirements.

³ The HBAP, ERAP, and SCAP all have lands designated "Agriculture Exclusive Grazing" (AEG), which, similar to the "Agriculture General" and "Agriculture Exclusive" land use designations under various LUPs, is implemented by the AE zoning district standards in the CZR. Because the AE zone implements different land use designations that are designated for different purposes, the changes to the CZR that the County is considering should address these LUP-specific distinctions in order for the CZR to conform with and be adequate to carry out the LUPs.

⁴ Policies 3.33-B-3 of the NCAP; 3.34-B-3 of the MAP; 3.24-B-2-c of the HBAP; and 3.34-B-3 of the ERAP state: *No greenhouse shall be approved for use on prime agricultural land, where the greenhouse has a slab foundation that would cover the underlying soil.*

One of the categories of development covered by the Order is “agricultural accessory structures,” including those defined in section 313-69.1.5 (formerly A314-1 G) of the CZR. The Order does not apply to those AE-zoned lands or portions of AE lands located within (a) a coastal wetland; (b) 100 feet of a stream; (c) 200 feet of a coastal wetland; (d) the Commission’s CDP jurisdiction; or (e) the Commission’s appeal jurisdiction. However, the Order does apply to significant expanses of agricultural lands within the coastal zone.⁵

The section of the CZR that the County is considering changes to is the same section of the CZR referenced in the Order, which authorizes the development of agricultural accessory structures, (including greenhouses) without the need for a CDP in certain areas. The Order includes various conditions for development authorized pursuant to the Order, including the following (in part):

- G. Conformity with LCP. Development under this exclusion shall conform with the Humboldt County LCP in effect on the date of this exclusion as adopted by the Commission or to the terms and conditions of this exclusion where such terms and conditions specify more restrictive development criteria.
- H. Amendment of LCP. In the event an amendment of the Humboldt County LCP is certified by the Coastal Commission pursuant to Section 30514 of the Coastal Act, development under this order shall comply with the amended LCP except where the terms and conditions of this order specify more restrictive development criteria. However, such amendment shall not authorize the exclusion of any category of development not excluded herein, nor shall such amendment alter the geographic areas of the exclusion.
- J. Limitation. Any development not falling within this exclusion remains subject to the coastal development permit requirements of the Coastal Act of 1976.

If the County adopts changes to section 313-69.1.5 of the CZR that are more restrictive than the existing LCP, future development exclusions authorized pursuant to the Order would have to meet the more restrictive standards. For example, the proposal to impose lot coverage limits for greenhouses and clustering of greenhouses and other structures, if adopted and certified by the Commission, would apply to future greenhouse construction that is excluded from CDP requirements under the Order, because under the existing CZR, there are no such limits specified for greenhouses or such clustering requirements. However, if the County adopts and the Commission certifies changes to section 313-69.1.5 of the CZR that are less restrictive than the existing LCP, or if the adopted/certified changes include a new category of development not currently covered under the Order, future development exclusions authorized pursuant to the Order would have to comply with the Order and with section 313-69.1.5 of the CZR as it existed at the time that the Order was approved, since those standards would be more restrictive than the updated CZR. For example, if the County amends the CZR to allow greenhouses with concrete slab floors to be located on prime agricultural soils, that change to the CZR would lessen protections for prime agricultural lands compared to the CZR requirements in 1986 at the time that the Order was approved (and that could be considered a new category of development not previously excluded under the Order). Therefore, as required by condition H cited above, future greenhouse development eligible for exclusion under the Order would have to comply with the more

⁵ In its analysis and findings related to the proposed CZR changes, we recommend that the County’s analysis be informed by an assessment of the estimated acreages of AE lands eligible for inclusion under the Order versus those AE lands not eligible for inclusion under the Order, with an evaluation of how the proposed CZR changes may effect greenhouses potentially excluded from CDP requirements under the Order.

restrictive development criteria of the Order and with the current version of the CZR prior to its amendment.⁶

Again, thank you for the opportunity to provide comments. We'd be happy to meet to discuss these issues further at your convenience.

Sincerely,

A handwritten signature in black ink that reads "Melissa B. Kraemer". The signature is written in a cursive, flowing style.

MELISSA B. KRAEMER
Supervising Analyst

⁶ Greenhouses still could potentially be constructed in areas where the Order applies, but applicants would have to apply for a CDP for greenhouse construction rather than obtain authorization to exclude the greenhouse construction from CDP requirements under the Order (see condition J above).

Attachment 4

Categorical Exclusion Order E-86-4

EXHIBIT A

CATEGORICAL EXCLUSION ORDER E-86-4

The Commission by a two-thirds vote of its appointed members hereby adopts an order, pursuant to Public Resource Code Section 30610(e) and 30610 5(b) which excludes the following categories of development in the coastal zone of Humboldt County from the permit requirements of the California Coastal Act of 1976. However, no development located on tide or submerged lands, beaches, lots immediately adjacent to the inland extent of any beach, or the mean high tide line of the sea where there is no beach and all lands and water subject or potentially subject to the public trust is excluded by this order. The Commission hereby orders that the following developments within the excludable area shall not require a coastal development permit.

I CATEGORY OF DEVELOPMENT

(a) Single Family Dwellings

Certain types of development in designated areas of the coastal zone as described below will be exempt from the requirements of a coastal development permit or administrative coastal development permit.

The construction, reconstruction, demolition, repair, maintenance, alteration, or addition to any single family dwelling or accessory building, on a legally created lot, and after review and approval of the required geologic reports in hazardous areas as required by the County's Local Coastal Program, except as follows.

1 It requires a discretionary permit (use permit, subdivision or variance,

2 The development is subject to archaeological resource area regulations pursuant to Section A-314-52 or A314-53 of the certified Coastal Zoning Ordinance, or

3 The building site is within the Coastal Commission's retained post-LCP certification permit or appeal jurisdiction pursuant to Public Resources Code Section 30519 and 30603

4 For Shelter Cove only

This categorical exclusion shall expire for development within the Shelter Cove area, as delineated on maps 7 & 8, (see Appendix B), if and when the Shelter Cove water allocation policy (South Coast Area Plan Section 3 21C) is implemented.

1 Geographic Area The type of development described above will be exempt from the requirements of a coastal development permit or administrative coastal development permit only within the following areas as mapped in Appendix D; and as shown on the notarized exclusion maps on file with the Coastal Commission's North Coast Area Office in San Francisco and the County of Humboldt in Eureka.

- a The "Myrtle town" area adjacent to the City of Eureka, Humboldt County,
- b McKinleyville (Ocean Avenue, School Road, Hiller Road)
- c Manila (along Navy Base Road), excluding those areas described in condition B below.
- d Pine Hill (adjacent to the City of Eureka between the coastal zone boundary and the Eel River floodplain)
- e Humboldt Hill (between U S 101 and the coastal zone boundary)
- f Fields Landing (between Railroad Avenue and C Street)
- g Loleta (between Eel River Drive, the Northwestern Pacific Railroad right-of-way, and Summer Street)
- h Shelter Cove

(b) Agricultural Accessory Structures

Certain types of development in designated areas of the coastal zone as described below will be exempt from the requirements of a coastal development permit or administrative coastal development permit

Agricultural Accessory Structures

1. The construction, reconstruction, demolition, repair, maintenance, alteration, or addition of:
 - a. An agricultural accessory structure, as defined in Section A314-1 G of the Humboldt County Zoning Ordinance,
 - b. Fences for farm or ranch purposes,
 - c. Electric utility lines, serving agricultural related buildings, wells, and storage tanks and water distribution lines,
 - d. Storage tanks and water distribution lines for on-site agriculturally related activities,
 - e. Wells for non-domestic, agricultural use on the subject farm or ranch, and
 - f. Water pollution control facilities for dairy and other agricultural purposes constructed in compliance with waste discharge requirements or other orders of the Regional Water Quality Control Board

Agriculture means the tilling of the soil, the raising of crops, horticulture, vermiculture, viticulture, livestock, farming, dairying, and animal husbandry, including all uses customarily incidental and necessary thereto

- 2 The above described exclusions apply only on a legally created lot and does not apply to the following
 - a Construction of a single family residence or other structures for human occupancy,
 - b Structures located within 100 feet of a permanent or intermittent blue line stream as identified on the USGS 7-1/2 minute quadrangle map,
 - c Structures located within a wetland or transitional agricultural land (farmed wetland) as defined by the certified Local Coastal Program, or
 - d Structures located within the State retained post-LCP certification permit or appeal jurisdiction pursuant to P R C Sections 30519 and 30603

A Geographic Area The type of development described above will be exempt from the requirements of a coastal development permit or administrative coastal development permit only within the following areas as mapped in Appendix A

The exclusion area includes the agriculturally designated land within the unincorporated area of the County of Humboldt planned and zoned as AE-Agricultural Exclusive

This exclusion shall not apply to potential trust lands as identified by the State Lands Division in the trust claim maps (1-77), wetlands as identified in power siting wetland resource maps or in areas west of designated public roads paralleling the sea or one half mile from the sea, whichever is less. The exclusion area is designated on the exclusion maps following Commission adoption of the Exclusion Order, notarized exclusion maps will be filed with the Commission, the North Coast Area Office, and Humboldt County

(c) Lot Line Adjustments

Certain types of development in designated areas of the coastal zone as described below will be exempt from the requirements of a coastal development permit or administrative coastal development permit.

Lot Line Adjustments

- 1 Lot line adjustments, as defined in Section 66412 (d) of the California Government Code (Subdivision Map Act), between two or more existing adjacent parcels, where the land taken from one parcel is added to an adjacent parcel, and where a greater number of parcels than originally existed is not thereby created

- 2 The above described exclusion applies only on legally created parcels and does not apply to the following
 - a Lot line adjustments located within wetlands or transitional agricultural (farmed wetlands) as defined by the certified Local Coastal Program, or
 - b Lot line adjustments located within the State retained post-LCP certification permit or appeal jurisdiction pursuant to Public Resources Code Section 30519 or 30603

A. Geographic Area. The type of development described above will be exempt from the requirements of a coastal development permit or administrative coastal development permit only within the following areas as mapped in Attachment D

II FINDINGS AND DECLARATIONS FOR EXCLUSION RECOMMENDED FOR APPROVAL

The Commission hereby finds, for the reasons set forth below, that this exclusion, as conditioned, presents no potential for any significant adverse effect, either individually or cumulatively on coastal resources or on public access, to, or along the coast

The Commission finds that for the same reasons that this exclusion will have not potential for any significant effect, either individually or cumulatively, on the environment for purposes of the California Environmental Quality Act of 1970

The Commission further finds and declares as follows

A Provision for Categorical Exclusion. Public Resources Code Section 30610(e) states that no coastal development permit shall be required for

- (e) Any category of development, or any category of development within a specifically defined geographic area, that the commission, after public hearing, and by two-thirds vote of its appointed members, has described or identified and with respect to which the commission has found that there is no potential for any significant adverse effect, either individually or cumulatively, on coastal resources or on public access to, or along, the coast and, where the exclusion precedes certification of the applicable local coastal program, that the exclusion will not impair the ability of local government to prepare a local coastal program

Public Resources Code Section 30610 5(b) requires, in part

(b) Every exclusion granted under subdivision (a) of this section and subdivision of (e) Section 30610 shall be subject to terms and conditions to assure that no significant change in density, height, or nature of uses will occur without further proceedings under this division, and an order granting an exclusion under subdivision (e) of Section 30610 may be revoked at any time by the commission, if the conditions of exclusion are violated. Tide and submerged land, beaches, and lots immediately adjacent to the inland extent of any beach, or of the mean high tide line of the sea where there is no beach, and all lands and waters subject to the public trust shall not be excluded under subdivision (e) of Section 30610.

1 SINGLE FAMILY RESIDENCES

A Public Access Public Resources Code Section 30211 and 30212 require that existing public access be protected and that new development along the shoreline provide access.

The proposed exclusion will not have a significant impact on existing or potentially required public access. All of the excluded development is located in areas inland of the first public road paralleling the sea. None of the excluded areas at Myrtle town, Pine Hill, Manila, Fields Landing, Humboldt Hill or Loleta, or Shelter Cove, are located on or adjacent to lands proposed for public access. In the McKinleyville area, the excluded area includes the route of the coastal trail between Hiller Road and School Road. The coastal trail route through this area is located on an existing County right-of-way and so will not be affected by adjacent development.

The Commission therefore finds that the exclusion included within the order is consistent with the public access policies of the Coastal Act.

B Environmentally Sensitive Habitat/Water Resources Public Resources Code Section 30240 provides that environmentally sensitive habitat shall be protected from disruption and that only those uses dependent upon the resources within the habitat may be allowed in such areas. In addition, Section 30240(b) requires that development in areas adjacent to sensitive habitats be sited and designed to protect the habitat. Coastal Act Section 30231 requires the protection and, where feasible, restoration of the biological productivity and quality of coastal waters, streams, wetlands, and estuaries through, among other means, controlling runoff and maintaining natural vegetation buffer areas that protect riparian habitats.

The residential development allowed under the exclusion will be located in existing developed areas which do not contain wetlands or streams. As submitted, the exclusion will not permit development within natural drainageways that might discharge runoff to such habitat areas. In its action on the County's certified LCP, the Commission found that development within

buffer areas of up to 200 feet from streams and wetlands must be controlled to prevent adverse effects to adjacent environmentally sensitive habitats. For this reason, the conditions of this categorical exclusion require that the exclusion not apply within 200 feet of streams and wetlands. New development within these buffer areas will continue to be subject to coastal development permit requirements and the policies of the County's certified LCP to ensure protection of adjacent habitat areas. For these reasons, the exclusion will not have a significant adverse effect on environmentally sensitive habitat areas.

C Agricultural and Forestry Resources Public Resources Code Section 30241 and 30242 require that prime agricultural land and other land suitable for agricultural use be protected by limiting non-agricultural uses. Coastal Act Section 30243 requires the protection of coastal commercial timberlands.

None of the excluded areas are planned for agricultural or commercial timber use. Where excluded areas are located adjacent to agricultural lands, they are typically separated by topographic features, such as bluffs or gulches, which help to minimize conflicts with agriculture.

For these reasons, the Commission finds that the development permitted under the exclusion is consistent with the Agricultural and Forestry Resources policies of the Coastal Act.

D Hazards. Public Resources Code Section 30253 provides in part that:
New development shall:

(1) Minimize risks to life and property in areas of high geologic flood and fire hazard.

(2) Assure stability and structural integrity.

The siting of structures along bluffs and beaches involves hazards and potential damage due to erosion, wave attack and land failures. The order does not exclude residential development in the Commission's appeal jurisdiction, which includes the shoreline where these hazards exist, or on the first row of lots adjacent to the beach or mean high tide line where there is no beach. Developments in these areas will require a coastal development permit. In addition, the excluded areas do not include floodplains or areas of moderate or high slope instability hazards as mapped in the Humboldt County LCP, or areas within Alquist-Priolo Special Study Areas as mapped by the California Division of Mines and Geology.

The Commission therefore finds that the exclusion is consistent with Coastal Act Section 30253 since development that could result in hazards or geologic instability will remain subject to coastal permit requirements.

E. Visual and Scenic Resources Public Resources Code Section 30251 states in part that

The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance

Section 30253(5) states

Where appropriate, protect special communities and neighborhoods which, because of their unique characteristics, are popular visitor destination points for recreational uses

The areas included within the exclusion do not include any highly scenic areas as designated by the County or the Department of Parks and Recreation. These highly scenic areas are designated as coastal scenic and coastal view areas in the County's LCP and are not included within this exclusion order. As proposed, the exclusion is limited to existing developed areas and applies only to residences less than thirty-five feet in height. This is in keeping with the present scale of development in these areas.

The Commission finds that the exclusion included in this order is consistent with Coastal Act policies related to the protection of visual resources.

F. Locating New Development. Public Resources Code Section 30250(a) provides that

(a) New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have a significant adverse effects, either individually or cumulatively, on coastal resources. In addition, land divisions, other than leases for agricultural uses, outside existing developed areas shall be permitted only where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels.

Additionally, Section 30254 requires that new development be capable of being served by public services (such as roads, water, sewer) without precluding service capacities for priority uses such as recreation and other visitor serving facilities.

The exclusion covers construction of single family residences on existing vacant legal lots in certain coastal areas. The Commission has found that the County's certified LCP adequately plans for new development that can be handled by existing and future service capacities. The exclusion is for single family residences in the urban areas with the LCP designated urban/rural boundaries where there are adequate public services. Adequate sewer and water services exist for the buildout of these areas to the LCP permitted densities.

As such the Commission finds the exclusion consistent with Coastal Act policies related to locating and planning new development

G Archaeological Resources Coastal Act Section 30244 requires that where new development would adversely affect archaeological resources identified by the State Historic Preservation Officer, reasonable mitigation measures shall be provided

The Wiyot are the indigenous people who consider the areas proposed for exclusion as their home. Archeologically sensitive areas, including areas occupied by the Wiyot, are located in a variety of sites in the McKinleyville, Humboldt Bay, and Eel River areas. In comments on the previous exclusion, the State Historic Preservation Officer requested the exclusion order consider adverse effects to archeologically sensitive areas and historic sites.

In response to this comment, the Commission's staff has reviewed available archeological information, including the U S Army Corps of Engineers' Humboldt Bay Wetlands Review, Winzler and Kelly's Archeological Resources Analysis Humboldt Bay Wastewater Authority, and other materials on file with the Natural Resources Division, Humboldt County Department of Public Works, and has consulted with the California Archaeological Inventory, Northwest Information Center at Sonoma State University. Based on this existing information and the advice of the California Archeological Inventory, it appears that recorded archaeological sites are not located within the proposed exclusion areas at McKinleyville, Pine Hill, Humboldt Hill, Fields Landing, Loleta or Shelter Cove. Archeologically sensitive areas are located in those portions of the proposed Manila exclusion area which are south of the northern intersection of Peninsula Drive and New Navy Base Road (Attachment D). Because this area is archeologically sensitive, the conditions of this exclusion order require that the exclusion not be applied within this area. New development within this archeologically sensitive area will continue subject to coastal development permit requirements to ensure that adverse impacts to archeologically sensitive areas are adequately mitigated. For this reason, the exclusion conforms to Section 30244 of the Coastal Act.

2 AGRICULTURAL RELATED DEVELOPMENTS

A Agricultural Compatibility

Section 30241 of the Coastal Act provides that

The maximum amount of prime agricultural land shall be maintained in agricultural production to assure the protection of the areas agricultural economy, and conflicts shall be minimized between agricultural and urban land uses through all of the following

- (a) By establishing stable boundaries separating urban and rural areas, including, where necessary, clearly defined buffer areas to minimize conflicts between agricultural and urban land uses

(b) By limiting conversions of agricultural lands around the periphery of urban areas to the lands where the viability of existing agricultural use is already severely limited by conflicts with urban uses or where the conversion of the lands would complete a logical and viable neighborhood and contribute to the establishment of a stable limit to urban development

(c) By permitting the conversion of agricultural land surrounded by urban uses where the conversion of the land would be consistent with Section 30250

(d) By developing available lands not suited for agriculture prior to the conversion of agricultural lands

In addition, Section 30242 of the Coastal Act states that

All other lands suitable for agricultural use shall not be converted to non agricultural uses unless (1) continued or renewed agricultural use is not feasible, or (2) such conversion would preserve prime agricultural land or concentrate development consistent with Section 30250. Any such permitted conversion shall be compatible with continued agricultural use on surrounding lands

These two sections of the Coastal Act emphasize (1) protection of agriculture and that (2) development should not be in conflict with the area's agricultural production. The structures identified for exclusion are those which are accessory to and necessary for the agricultural use. Thus the proposed exclusion is consistent with Sections 30241 and 30242 of the Coastal Act.

A definition of of agriculture has been included as part of the conditions related to the exclusion order for Agricultural Related development. In the Commission's previous action on this categorical exclusion (E-79-1), the same definition was included. As neither the Land Use Plan nor the Implementation Plan define agriculture, inclusion of a definition will provide a framework for the County to ensure maximum protection of agricultural resources.

B Visual and Scenic Resources Public Resources Code Section 30251 states in part that

The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance

Section 30253(5) states

Where appropriate, protect special communities and neighborhoods which, because of their unique characteristics, are popular visitor destination points for recreational uses

The protection of the visual and scenic qualities is an important issue identified both in the development of local coastal programs and permit review. In particular, the Coastal Act requires the protection of public views to and along the ocean and in scenic coastal areas. The approval of any significant structure in these areas requires careful consideration of the surrounding topography and the location of the development such that the public views are protected. Therefore, the Commission finds that no exclusion can be granted in those areas where public views or scenic coastal areas could be adversely impacted by new development.

In general, in the agricultural areas inland of the coast highway, the scenic views are actually protected by the agricultural use and those accessory buildings necessary for the continued agricultural use are not detrimental to the scenic values and found to be compatible with the surrounding topography and use.

However, in those areas not mapped as part of the geographic area of exclusion (generally between the first public road parallel to the shoreline and the shoreline or the area adjacent to the shoreline), public view and scenic qualities could be adversely impacted by structures. Therefore, the Commission finds that in such areas, the agriculturally related development has a potential for significant adverse impacts, either individually or cumulatively on coastal resources, specifically the scenic and visual qualities of the areas. In addition, development on or adjacent to the shoreline raises other significant issues including geological hazards and public access where it could also be found that any development could have significant adverse effect either individually or cumulatively.

The Commission finds that the exclusion included in this order is consistent with Coastal Act policies related to the protection of visual resources.

C Wells, Storage Tanks, and Water Distribution Lines

Public Resources Code Section 30231 states that

The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams

The purpose of this exclusion is to provide agricultural operations with the ability to construct wells, on site storage facilities, and related water distribution lines to ensure that water supplies are made available for agricultural purposes in an expeditious manner. The Commission finds, after review of the permit experience to date, the policies contained in the County's certified LCP, and based upon estimates of the facilities that might be added under this exclusion, that the projects would have no potential for significant adverse impacts on coastal resources and would be of a size that would not present visual or other significant issues. The Commission finds that the exclusion as conditioned, will simplify permit requirements and will support the Coastal Act of protecting agriculture.

During the previous comment period for E-83-4, the State Historic Preservation Officer noted that the Negative Declaration should take into account the potential effects of altering or demolishing a significant historic structure and siting new construction on top of significant archaeological deposits. Special Condition 1a for Single Family Residences addresses the latter concern while inclusion of a definition of historical structure addresses the former concern.

3 LOT LINE ADJUSTMENTS

A. Existing Local Controls A lot line adjustment is a routine function of local government usually handled by the planning department and, as such, the Commission finds that the administrative procedures in practice by the local government are sufficient to address the subject matter of the proposed exclusion.

B. Impact on Coastal Resources The exclusion of lot line adjustments will have no impact at all on coastal resources. The legal adjustments of existing property lines is of no coastal significance. Wetlands, which might be affected by adjustment of lines to create parcels lying wholly with marsh and other habitat areas are not covered by this exclusion.

C. Public Access Public access will not be affected as areas between the first public road and the sea are not covered by this exemption, nor will there be effects upon road capacity or any other means of access.

III CONDITIONS

The following conditions apply to all categories of development excluded under this order.

A. Streams and Wetlands This order shall not apply to any development located within 200 feet, measured horizontally, of a coastal stream or wetland.

B. Mapping This order of categorical exclusion shall not become effective until Humboldt County submits to the Executive Director of the Coastal Commission and the Executive Director approves, in writing, a revised map or maps depicting all of the following:

1. The geographic areas excluded by Commission order

- 2 The statutorily non-excludable areas which are
Tide and submerged lands, beaches, lots immediately adjacent to the inland extent of any beach or of the mean high tide line where there is no beach, and all lands and water subject to the public trust (source maps depicting these areas are available from the Commission's Mapping Division
3. The zoning designations of the excluded area
- 4 All coastal bodies of water, riparian corridors, and wetlands as may be shown on any land use plan resources maps or background studies.
- 5 A map note which clearly indicates that the written terms of this order should be consulted for a complete listing of non-excludable developments. The note shall, to the maximum extent practicable, indicate the topical areas which are non-excludable. It shall state that no development within two hundred feet from the boundary of any stream, wetland, marsh, estuary, or lake, is excluded by the terms of this order, regardless of whether such coastal waters are depicted on the exclusion or not. The map note shall further state that where the natural resource, environmentally sensitive habitat, open space or other similar policies of the certified LCP specify a geographically larger area of concern for natural resources, then no development shall occur in the area described in the LCP unless authorized by a coastal development permit.

C Determination by Executive Director The order for granting a categorical exclusion for these categories of development in Humboldt County, pursuant to Public Resources Code 30610, shall not become effective until the Executive Director of the Commission has determined in writing that the local government has taken the necessary action to carry out the exclusion order pursuant to Section 13244 of the Coastal Commission regulations.

D Exclusion Limited to Coastal Permits This exclusion shall apply to the permit requirements of the Coastal Act of 1976, pursuant to Public Resources Code Section 30610(e) and 30610 5(b), and shall not be construed to exempt any person from the permit requirements of any other federal, State or local government agency.

E Records Humboldt County shall maintain a record of any other permits which may be required for categorically exempt development which shall be made available to the Commission or any interested person upon request.

F Notice Within five working days of local approval of a development covered by this exclusion, the district office and any person who has requested such notice shall receive notification of exemption under this order on a form containing the following information

- i) Developer's Name
- ii) Street Address and assessor's parcel number of property on which development is proposed,
- iii) Brief description of development,
- iv) Date of application for other local permit(s),
- v) All terms and conditions of development imposed by local government in granting its approval of such other permits

G Conformity with LCP Development under this exclusion shall conform with the Humboldt County LCP in effect on the date of this exclusion as adopted by the Commission or to the terms and conditions of this exclusion where such terms and conditions specify more restrictive development criteria

H Amendment of LCP In the event an amendment of the Humboldt County LCP is certified by the Coastal Commission pursuant to Section 30514 of the Coastal Act, development under this order shall comply with the amended LCP except where the terms and condition of this order specify more restrictive development criteria. However, such amendment shall not authorize the exclusion of any category of development not excluded herein, nor shall such amendment alter the geographic areas of the exclusion

J Limitation Any development not falling within this exclusion remains subject to the coastal development permit requirements of the Coastal Act of 1976

SPECIAL CONDITIONS

The following special conditions apply only to the categories of development so indicated

1 Single Family Residences

A Archaeological Resources This order shall not apply within archeologically sensitive areas at Manila, as shown in Exhibit D

2 Agricultural Related Development

A Agriculture shall mean

"the tilling of the soil, the raising of crops, horticulture, vermiculture, viticulture, livestock, farming, dairying, and animal husbandry, including all uses customarily incidental and necessary thereto"

B Historical Structures

This exclusion shall not apply to any structure defined as "a qualified historical building or structure" by Health and Safety Code Section 18955 which states


For the purposes of this part, a qualified historical building or structure is any structure, collection of structures, and their associated sites deemed of importance to the history, architecture, or culture of any area by an appropriate local or state governmental jurisdiction. This shall include structures on existing or future national, state, or local historical registers or official inventories, such as the National Register of Historical Places, State Historical Landmarks, State Points of Historical Interest, and city or county registers or inventories of historical architecturally significant sites, places, historical districts, or landmarks.

IV REVISION AND REVOCATION

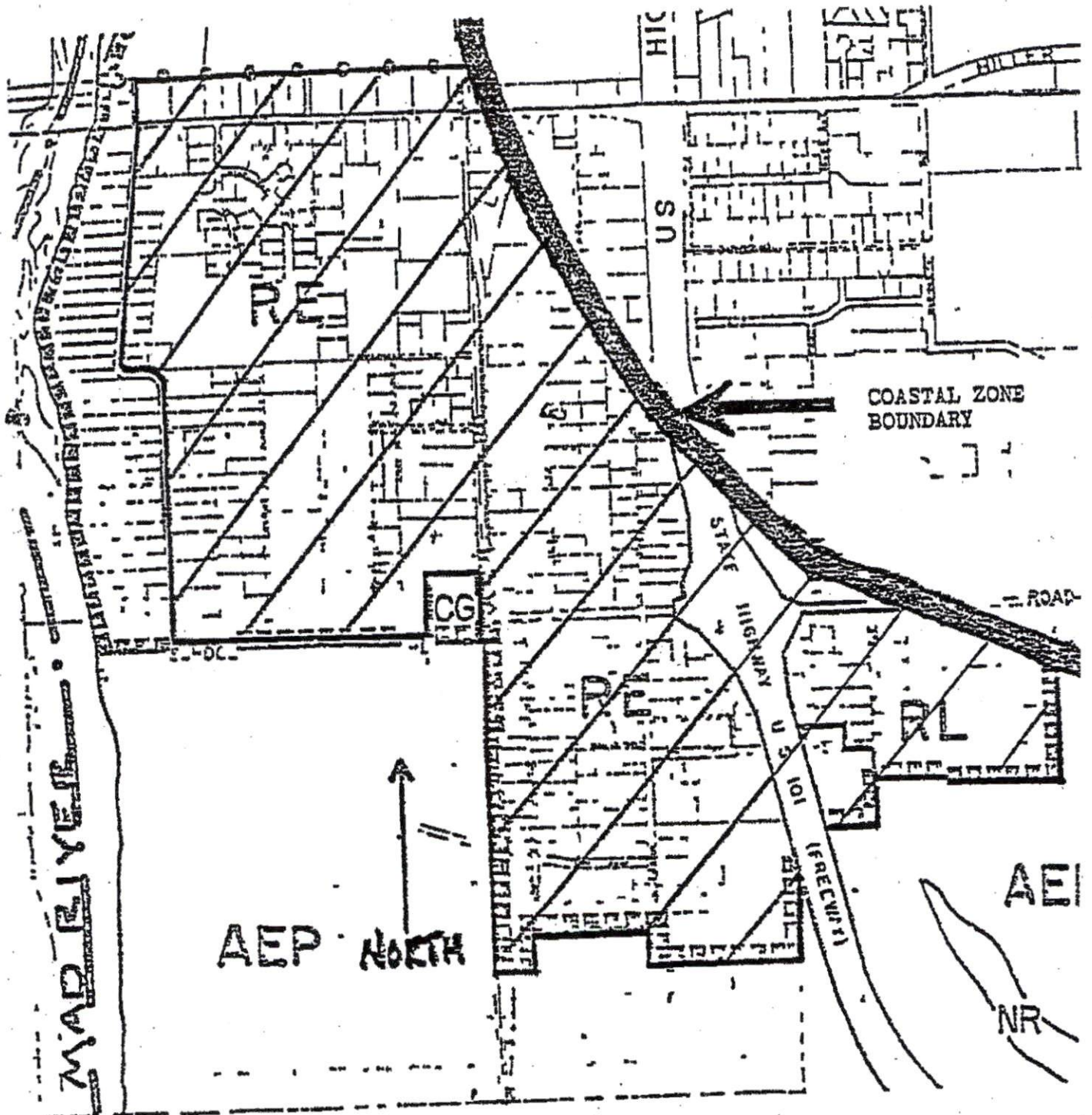
Pursuant to Title 14 of the California Administrative Code Section 13243(e), the Commission hereby declares that the order granting this exclusion may be rescinded at any time, in whole or part, if the Commission finds by a majority vote of its appointed membership after public hearing that the terms and conditions of the exclusion order no longer support the findings specified in Public Resources Code Section 30610(e). Further, the Commission declares that this may be revoked at any time that the terms and conditions of the order are violated.

CATEGORICAL EXCLUSIONS FOR SINGLE FAMILY RESIDENCES


AREA McKinleville (Ocean Avenue, School Road, Haller Road)

 Geographical Area to be Categorically Excluded for Single Family Residence

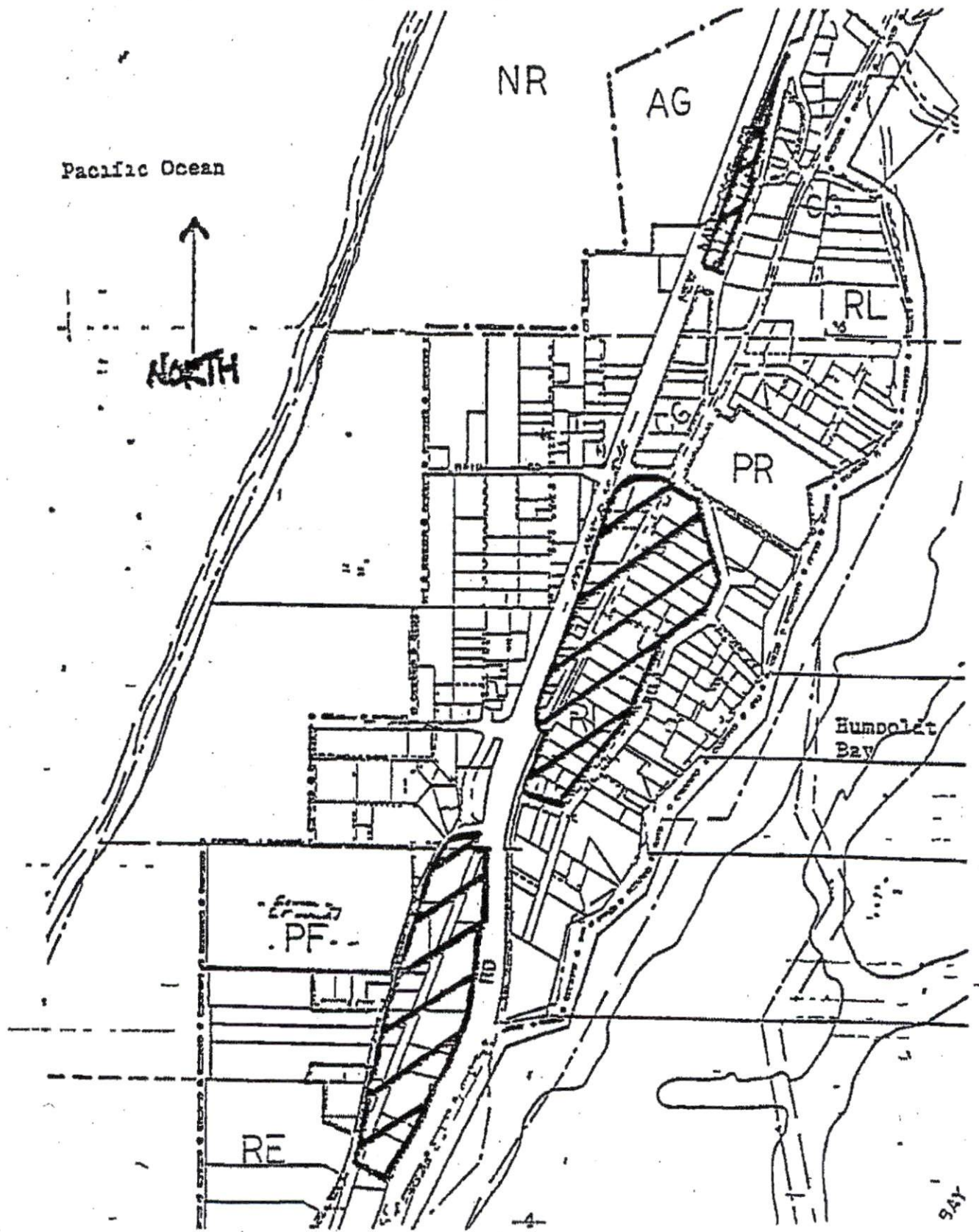
MAP 1



APEA Manila

 Geographical Area to be Categorized Excluded for Single Family Residence

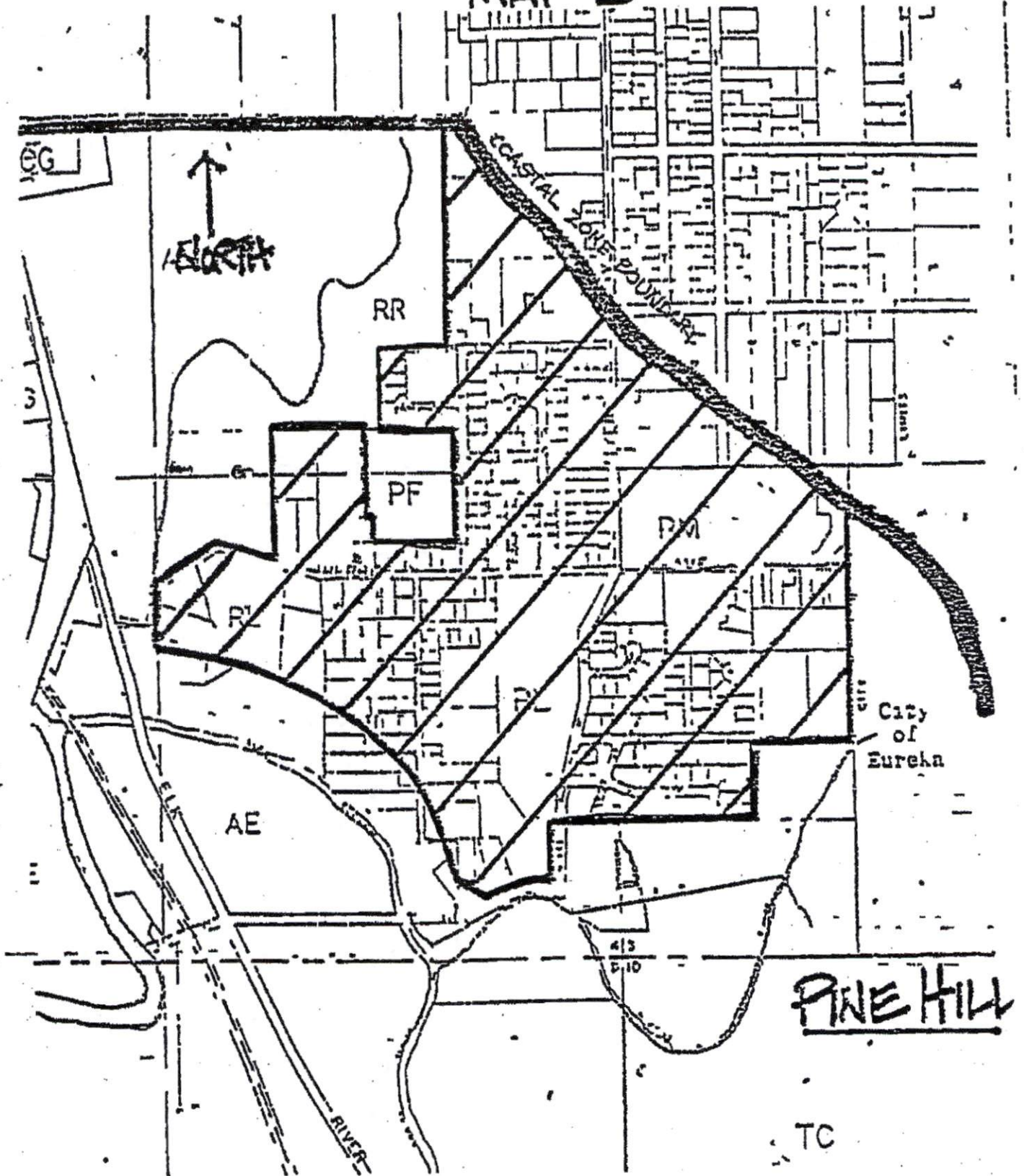
MAP 2

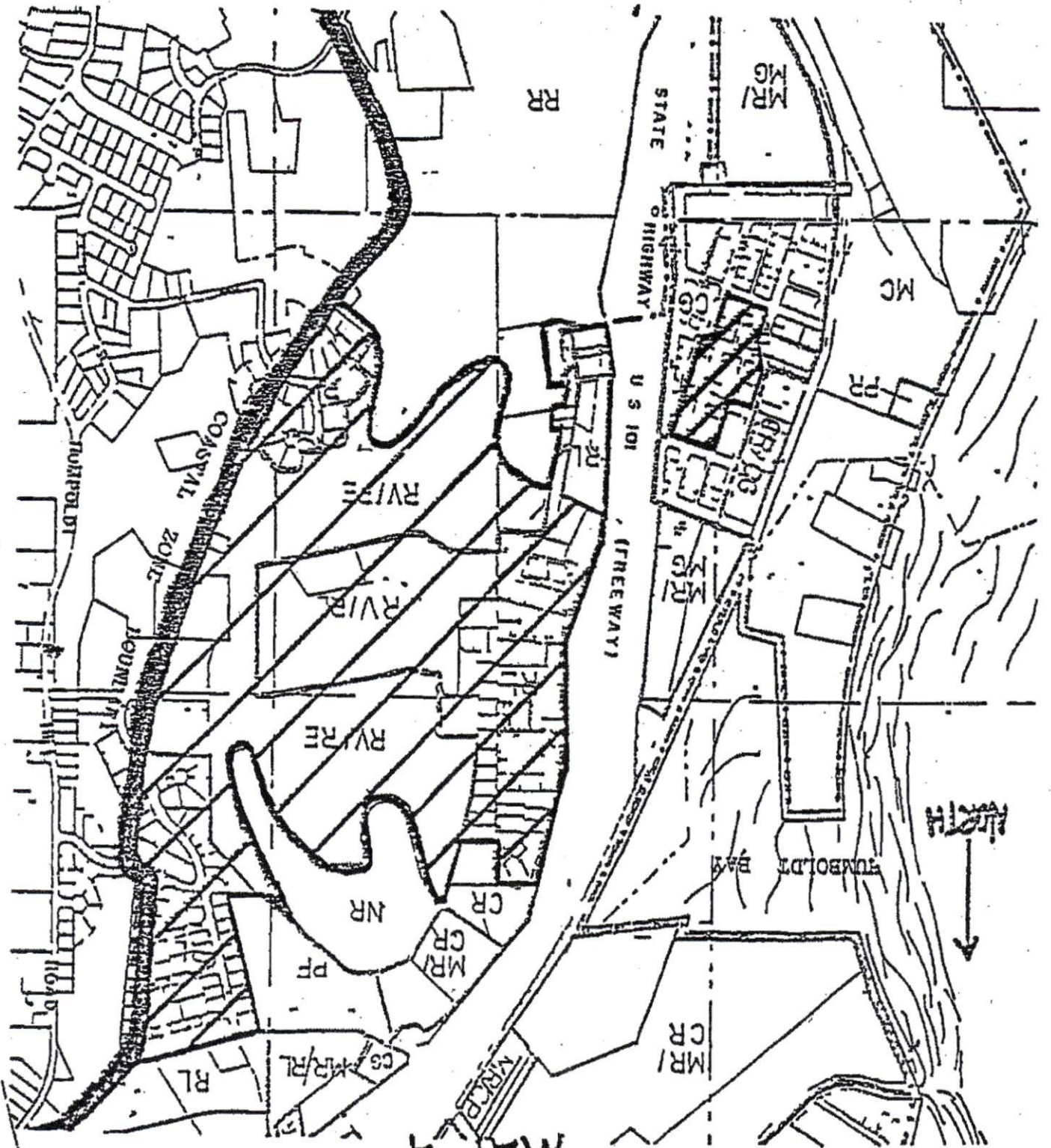



CATEGORICAL EXCLUSION FOR SINGLE FAMILY RESIDENCE

AREA Pine Hill
Geographical Area to be Categorical Excluded for
Single Family Residence

MAP 3

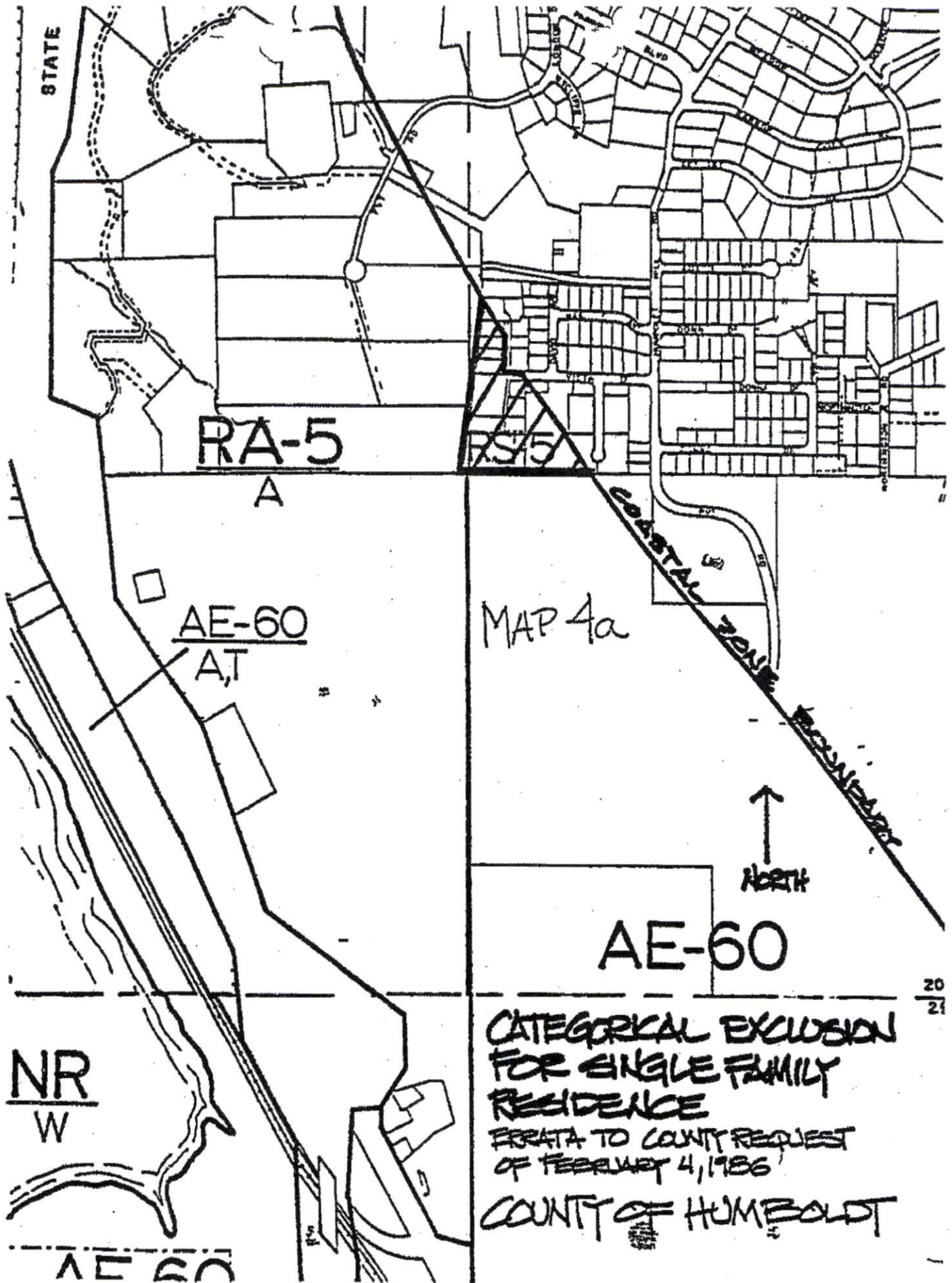




 Geographical Area to be Categorically Excluded for
 Single Family Residence

MAR 4

Area Humboldt Bay and Fields Landing

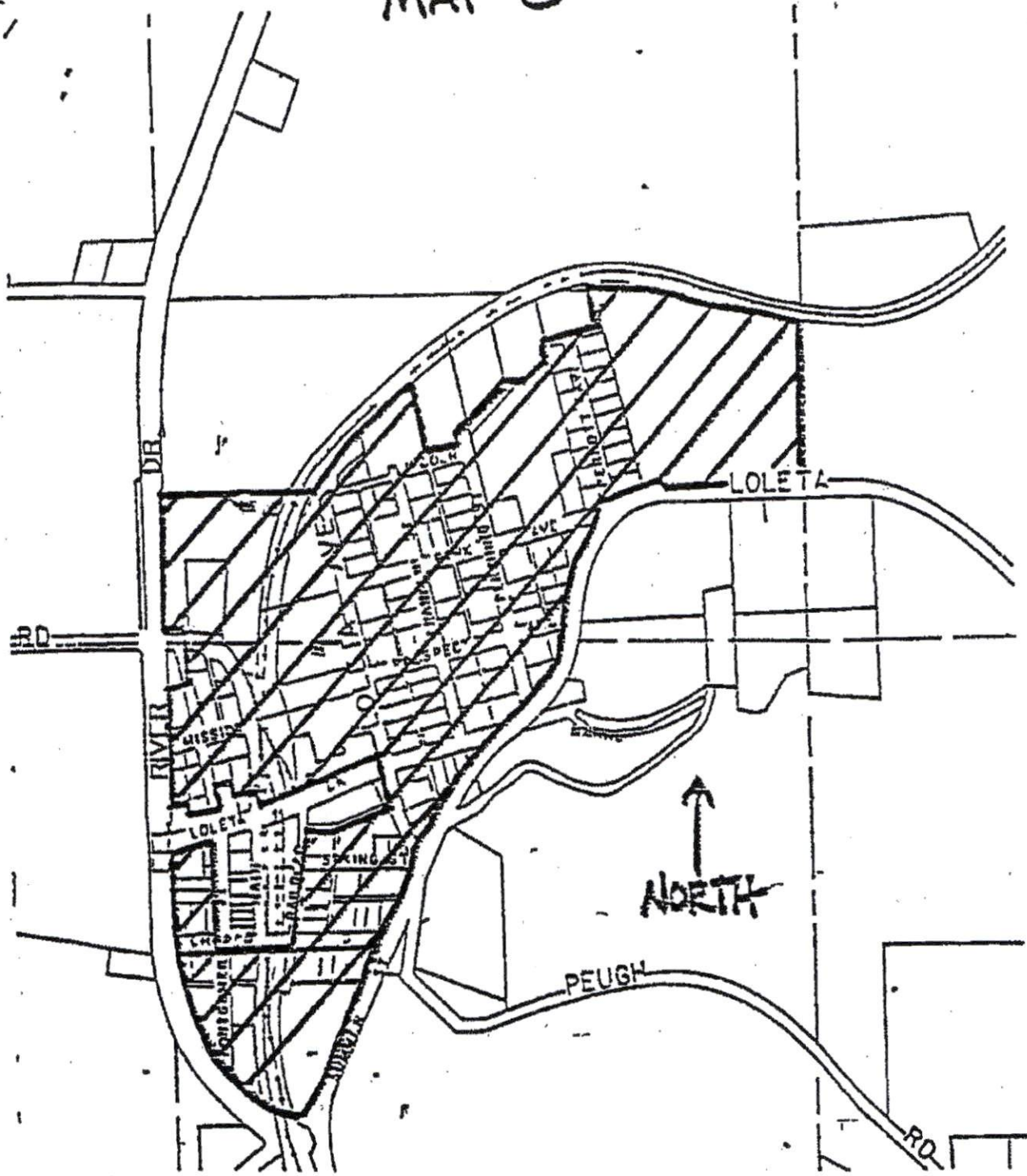


AREA Loleta



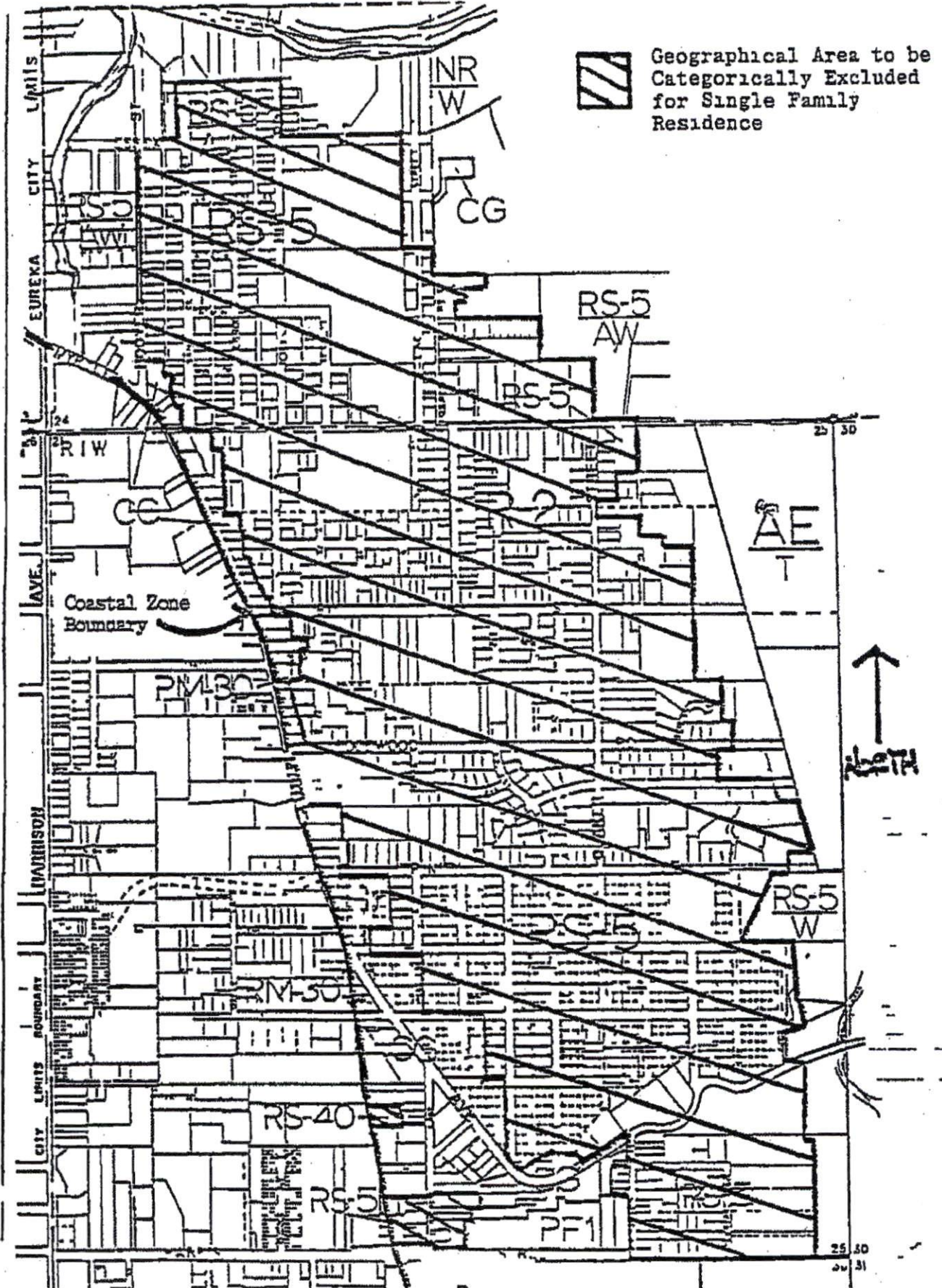
Geographical Area to be Categorically Excluded for Single Family Residence

MAP 5



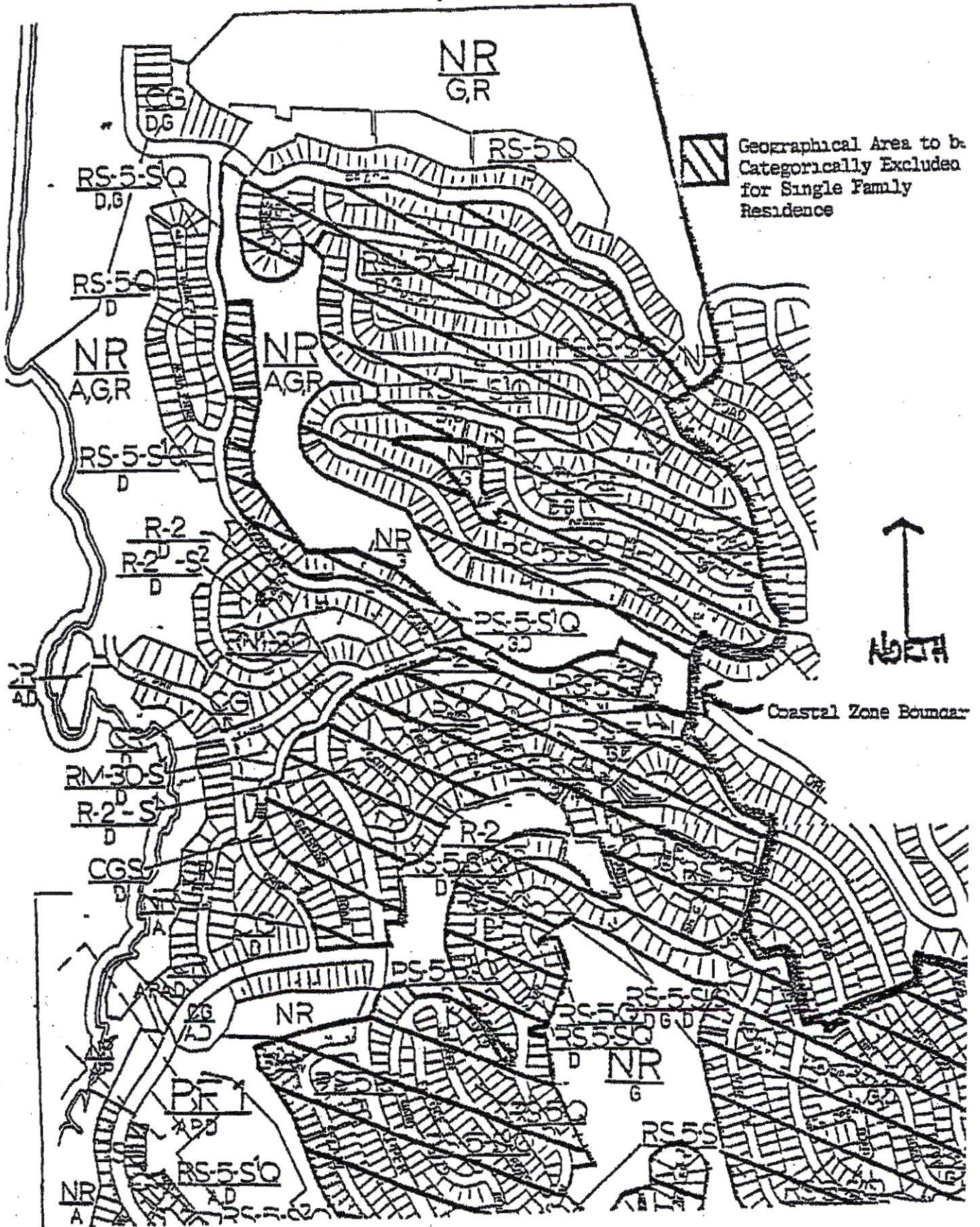
CATEGORICAL EXCLUSION FOR SINGLE FAMILY RESIDENCE
AREA Myrtle

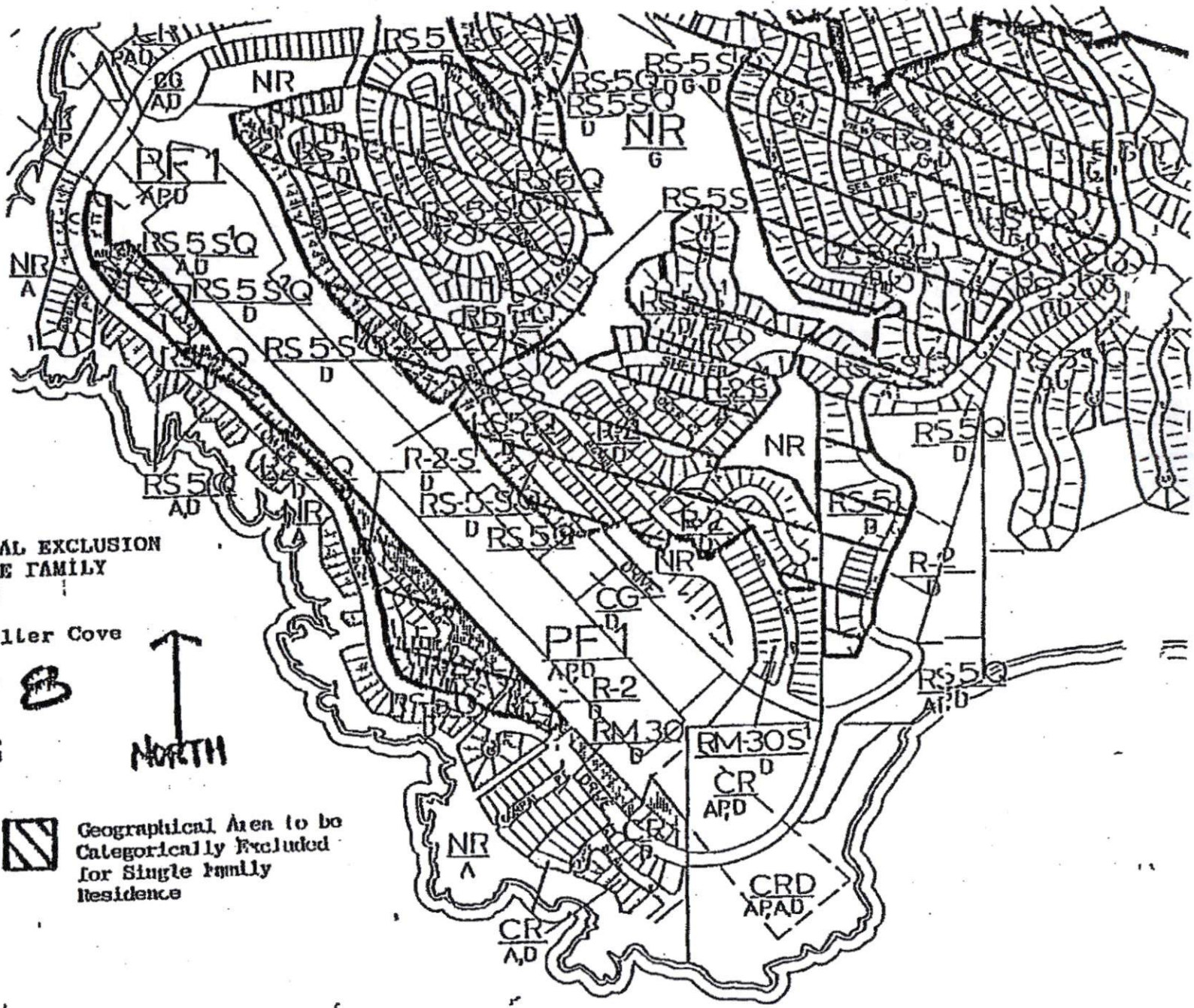
MAP 6



CATEGORICAL ZONING FOR SINGLE FAMILY RESIDENCE
 AREA Shelter Cove

MAP 7





CAIEGORICAL EXCLUSION
FOR SINGLE FAMILY
RESIDENCE

AREA: Shelter Cove

MAP B



Geographical Area to be
Categorically Excluded
for Single Family
Residence

CALIFORNIA COASTAL COMMISSION

431 HOWARD STREET 4TH FLOOR
SAN FRANCISCO CA 94103
(415) 543 8555

June 17, 1986

Ms Patty Dunn, Acting Planning Director
Planning Department
County of Humboldt
3015 H Street
Eureka, CA 95501

Dear Ms Dunn

On June 11, 1986, by a unanimous vote, the California Coastal Commission adopted Categorical Exclusion E-86-4. The Commission's adoption action included approval of the the Exclusion Order, Negative Declaration and Exclusion Maps for single family residences, agricultural accessory structures and boundary line adjustments as further described in the enclosed staff report

The Commission's exclusion order will not become effective until

- (a) The County, by appropriate action of the Board of Supervisors, acknowledges receipt of the Commission's resolution of approval, including any conditions which may have been required pursuant to Public Resources Code Section 30610 5,
- (b) The County, by appropriate action of the Board of Supervisors, accepts and agrees to the terms and conditions to which the Categorical Exclusion has been made subject, and
- (c) The Executive Director of the Commission determines in writing that the County's resolution is legally adequate to carry out the Exclusion Order and that the notification procedures satisfy the requirements of the Exclusion Order

Upon adoption of the proposed Exclusion Order, the County will have completed the Categorical Exclusion and will be able to process permits subject to the conditions of the Order

RECEIVED

JUN 17 1986

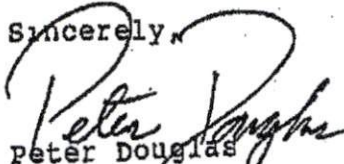
HUMBOLDT COUNTY
PLANNING COMMISSION

Ms Dunn
June 17, 1986
Page Two

Staff of our Mapping Services is now preparing the maps reflecting the Commission's action. Upon completion of this task and subsequent notarization, they will be forwarded to the County.

If you have any questions, please feel free to contact Noah Tilghman in this office.

Sincerely,


Peter Douglas
Executive Director

Enclosure

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Attachment 5

Public Comments after December 14, 2017

For Planning Commission Agenda of:

_____, 2018

Re: Project: Greenhouse Floor Ordinance Amendments

Case No.: OR-17-005

The following public comments were received concerning the draft ordinance (after 12/7/17)

Index #	Date	Comments received after to Planning Commission meeting
C13	2/15/2018	Email from Miles Raymer, Northern Emeralds re: pilot program
C14	2/14/2018	Email from John LaBoyteaux
C15	2/14/2018	Flyer commercial greenhouse design from John LaBoyteaux
C16	2/18/2018	Email from John LaBoyteaux

Milner, Mary

From: Miles Raymer <miles@northernemeralds.com>
Sent: Thursday, February 15, 2018 5:51 AM
To: Milner, Mary
Subject: Re: Participation in greenhouse pilot program?

Hi Mary,

Thanks for the quick reply. Yes, please do keep me in the loop and let me know if/when I can provide comment to try to get a pilot program for this off the ground.

Thanks again and take care!

On Wed, Feb 14, 2018 at 3:38 PM, Milner, Mary <MMilner1@co.humboldt.ca.us> wrote:

Hi Miles,

Sorry to say no pilot program has been approved yet, but it's an alternative in the revised ordinance amendments. I'm excited to get some feedback on the idea though, and we could use your help to flesh it out and show that it has some support. If there is support, someone like your company can give it the needed energy. If someone stepped up with a proposal the Commissioners can ponder, that would be a big help.

I don't have a date for the next PC meeting, which is where things could be acted upon. I can email you when I have that date in case you want to provide comment.

Best regards,

Mary Milner

707 268-3772

mmilner1@co.humboldt.ca.us

From: Miles Raymer [mailto:miles@northernemeralds.com]
Sent: Wednesday, February 14, 2018 3:19 PM
To: Milner, Mary <MMilner1@co.humboldt.ca.us>
Subject: Participation in greenhouse pilot program?

Hi Mary,

We heard from a contact at the HCGA that the County either has approved or is considering a pilot program for elevated mixed-light greenhouses on prime ag soils. Is that the case, and if so, is there anything my company needs to do in order to be eligible and/or considered for participation? We would be very interested!

Thanks for your time and have a good day!

--

Miles Raymer

Communications and Special Projects Manager

Northern Emeralds

707.499.9157

--

Miles Raymer

Communications and Special Projects Manager

Northern Emeralds

707.499.9157

C14

Milner, Mary

From: John LaBoyteaux <helenthemelon@earthlink.net>
Sent: Wednesday, February 14, 2018 9:31 AM
To: Milner, Mary
Subject: greenhouses

Mary,

If you would visit a web-site called "Growers Supply" which is a division of Farmtek. This is not a cannabis supply house but rather a very large nationwide supplier of specialty farming equipment. Follow the links to "commercial greenhouses" there are a large number of sizes and styles available. A good example would be the GrowSpan 1000 and 2000 series. You can then follow additional links to heating and cooling equipment or "environmental control". As you scan through the site, I think you will see that many of the greenhouses utilize earthen floors and there is truly a vast inventory of available equipment.

Since we moved my hardcopy Growers Supply catalog has disappeared. Maybe you could order one as a resource for the department.

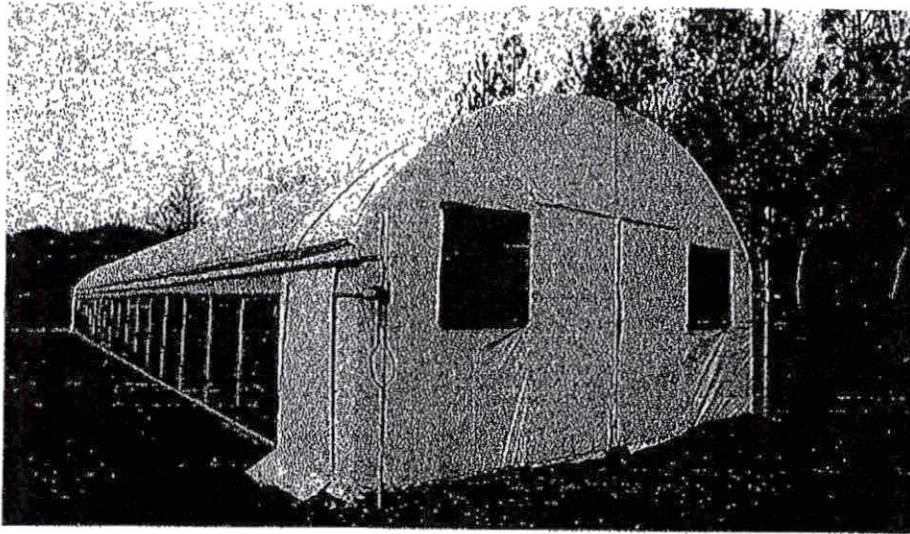
I plan to visit Spare Time Supply in Willits to see if they were the source for those kits I observed in that area.

John L

Mendocino Green House 485-0668 C15
Mick or RJ.

In Stock!

**Emerald Kingdom 30' x 100' Straight
Wall Fully Automated Blackout
Greenhouse**



- 30' Support Trussing Kit
- 2 36" Shutter Exhaust Fans
- 4 36" Louvered Vents
- 6 36" Light Traps
- 12 12" Versa-Kool Circulation Fans
- Blackout Motor
- A/C Timer Panel

016

Milner, Mary

From: John LaBoyteaux <helenthemelon@earthlink.net>
Sent: Sunday, February 18, 2018 11:46 AM
To: Milner, Mary
Cc: Terra Carver
Subject: Fwd: greenhouses (again)

Begin forwarded message:

From: "Kevin & Melanie from Shakefork Community Farm"
<shakeforkcommunityfarm@gmail.com>
Subject: Re: greenhouses (again)
Date: February 18, 2018 at 11:30:33 AM PST
To: John LaBoyteaux <helenthemelon@earthlink.net>

Hi John,

Here's a link to Oregon Valley Greenhouses' website: <http://ovg.com/>

It doesn't look like they offer any fancy add-ons, but might be worth calling to confirm.

We pulled plastic on our 2nd new tunnel on Friday in the worst wind possible. Talk about bad timing! But we got it up and secured, and now we can be reimbursed from the NRCS. I can't wait to get planting in it!

I hope all is well.

Melanie

On Fri, Feb 9, 2018 at 8:41 AM, John LaBoyteaux <helenthemelon@earthlink.net> wrote:
Kev, Mel,

The place you get your greenhouse kits in Oregon, do they also offer heating, cooling, filter equipment? Web site?

The issue continues.

John

--
Shakefork Community Farm
Kevin and Melanie Cunningham