

**RESOLUTION OF THE ZONING ADMINISTRATOR  
OF THE COUNTY OF HUMBOLDT**

**Resolution Number 25-029**

**CONDITIONAL USE PERMIT AND COASTAL DEVELOPMENT PERMIT  
PROJECT NUMBER PLN-2025-19144  
ASSESSOR PARCEL NUMBERS 308-131-012 and 308-131-020**

**MAKING THE REQUIRED FINDINGS FOR CERTIFYING COMPLIANCE WITH THE CALIFORNIA ENVIRONMENTAL QUALITY ACT AND CONDITIONALLY APPROVING THE 2121, LLC CONDITIONAL USE PERMIT AND COASTAL DEVELOPMENT PERMIT**

**WHEREAS**, the owner submitted an application and evidence in support of approving a Conditional Use Permit and Coastal Development Permit; and

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

**WHEREAS**, the Zoning Administrator has considered the Environmental Impact Report previously adopted for the Commercial Cannabis Land Use Ordinance as well as the Addendum to the Environmental Impact Report that was prepared for this project pursuant to Section 15164 of the CEQA guidelines; and

**WHEREAS**, the Planning Division staff report includes evidence in support of making all of the required findings for approving the Conditional Use Permit and Coastal Development Permit (Case Number PLN-2025-19144); and

**WHEREAS**, the Humboldt County Zoning Administrator held a duly-noticed public hearing on March 6, 2025, and reviewed, considered, and discussed the application for a Conditional Use Permit and Coastal Development Permit and reviewed and considered all evidence and testimony presented at the hearing; and

**NOW, THEREFORE**, be it resolved, determined, and ordered by the Zoning Administrator that:

## PROJECT DESCRIPTION

- 1. FINDING:** Conditional Use Permit and Coastal Development Permit for a new owner and operator of a cannabis cultivation project. The proposed project involves 28,656 sq. ft. of mixed light and 9,800 sq. ft. of outdoor cultivation within existing greenhouses, for a total of 38,465 sq. ft. Water for cannabis irrigation is sourced from an existing permitted groundwater well, as well as dehumidifiers that will capture up to 15% of estimated needs during peak demand. Processing, including trimming, will be completed off site at a licensed third-party processing facility. The parcel was previously approved for cannabis cultivation under PLN-11065-CUP. The 2121, LLC proposal does not include any increase in cultivation area, water use, or electrical consumption. The project is intended to operate within the existing footprint of the original project with no new ground disturbance proposed.

**EVIDENCE:** a) Project File: PLN-2025-19144

## CALIFORNIA ENVIRONMENTAL QUALITY ACT

- 2. FINDING:** The project complies with the requirements of the California Environmental Quality Act. The Humboldt County Zoning Administrator has considered the Environmental Impact Report previously adopted for the Commercial Cannabis Land Use Ordinance as well as the Addendum to the Environmental Impact Report that was prepared for this project pursuant to Section 15164 of the CEQA guidelines.

- EVIDENCE:**
- a) An addendum was prepared for this project.
  - b) The proposed project does not present substantial changes that would require major revisions to the previous Final Environmental Impact Report. No new information of substantial importance that was not known and could not be known at the time was presented as described by section 15162(c) of CEQA Guidelines.
  - c) The project will not have one or more significant effects not discussed in the previous Environmental Impact Report section 15162(a)(3)(A).
  - d) Significant effects previously examined will not be substantially more severe than shown in the previous Environmental Impact Report section 15162(a)(3)(B).
  - e) No mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more

significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative section 15162(a)(3)(C).

- f) No mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative section 15162(a)(3)(D).

### COMMUNITY PLAN FINDINGS – EEL RIVER AREA PLAN

**3. FINDING:** The proposed development is in conformance with all applicable policies and standards in the Eel River Area Plan (ERAP).

**EVIDENCE:** a) §3.26 Housing - The proposed project is consistent with the County's Housing Element and will not reduce the number of residential units.

b) §3.28 Hazards

Geologic – Geologic hazard maps show that the majority of the property to be relatively stable (low instability). The area of cannabis operations is located on an area of less than 15% slopes with no mapped historic landslides and outside of areas of potential liquefaction. No known earthquake faults are mapped on or adjacent to the site. No new exterior construction is proposed, therefore no soils report is required.

Flooding/Tsunami – The project site is not located in a FEMA 100-year flood zone, is not located in a tsunami hazard zone nor susceptible to coastal inundation related to sea level rise (1 meter). The project therefore conforms with the County's Flood Insurance Program.

Fire – The project site is located within the CalFire State Responsibility Area as well as the Loleta Fire Protection District and is mapped as an area of moderate fire hazard. There is an existing on-site 2,500-gallon water tank dedicated to fire suppression. All structures on the property meet the 30-foot SRA setback requirement. The project was referred to CAL FIRE and the local fire district for review and did not result in any comments or issues being raised with the proposal.

c) §3.29 Archaeological and Paleontological Resources - A referral was sent to Bear River Band of the Rohnerville Rancheria and the Wiyot Tribe on January 15, 2025. The site has been analyzed for sensitive cultural or archaeological resources that could be impacted from on-going cultivation, per original permit PLN-11065-CUP. A Cultural Resource Survey conducted by William Rich and Associates (October 2018) found

that no potential significant cultural resources were identified at the site and that no project-specific recommendations are warranted. No new construction is proposed, so no ground disturbance will occur. Nonetheless, the project is conditioned to include an inadvertent discovery protocol should the project encounter undocumented cultural resources.

- d) §3.34 Agriculture – Agricultural Exclusive is intended for prime and non-prime agricultural lands for long-term productive agricultural use. The Applicant is proposing to permit an existing commercial cannabis cultivation operation consisting of 28,656 square feet of existing mixed light and 9,800 square feet of existing outdoor commercial cannabis cultivation on lands designated as Agriculture Exclusive. General and intensive agriculture are allowable use types for this designation.

The existing cultivation is an agricultural use, and the supportive infrastructure for this use is accessory to the agricultural use and already permitted as agricultural related infrastructure under a previous Coastal Development Permit (CCC Permit 80-P-5). Installation of the proposed 20,000-gallons of water storage will not require development on grazing lands.

- e) §3.41 Environmentally Sensitive Habitats – The California Natural Diversity Database indicates that a portion of the property is within the territory of the Siskiyou checkerbloom and Point Reyes salty bird's-beak. Habitat for Northern Spotted Owl also exists in the project vicinity (approximately 3.45 miles away) but as no generators (except as an emergency back-up) are proposed, the noise impacts on NSO from the project will be well below the thresholds that could cause disturbance of the species. The project site exhibits upland characteristics as shown by the 2017 National Wetland Inventory (NWI) mapping. A review of the Eel River Area Plan Resources map and County GIS shows that an adjacent parcel to the west of the project parcel contains seasonally flooded palustrine wetland. This is approximately 800 feet away from the project activities. There are no sensitive or critical habitats on the project parcel.

There is no additional development planned for with this proposed project – use of the project parcel will be restricted to the existing footprint and operations that were previously permitted under PLN-11065-CUP. California Department of Fish and Wildlife (CDFW) was sent a referral for the proposed project and no response was received.

- f) §3.42 Visual Resources - The proposed project is not within a Coastal

Zone Scenic View Area, nor within a Coastal Zone Scenic Area, as depicted on the County's GIS database. The proposed project does not alter any natural landforms. The existing on-site structures utilized for the project were built in the 1980's and are not considered historical buildings. No new exterior development is proposed.

- g) §3.50 Access – The project site does not include any coastal access points, accessways, scenic views, or scenic areas. The project will not have an impact on coastal access.
- h) §4.41 Agricultural Lands – Grazing lands along Table Bluff are planned Agriculture Exclusive – Grazing (AEG). Minimum parcel size for Table Bluff is 160 acres. New homesites can be created with a density not to exceed 20 acres per dwelling unit. The existing parcel size for the project is 26.1 acres. This parcel was created by a Notice of Merger in 1980 and has been recognized as a separate legal parcel. It is existing non-conforming as to parcel size, however, the project will not increase the severity of this non-conformance. The installation of the proposed 20,000 gallons of water storage will not require the development of grazing lands.
- i) §4.71 Resource Protection, Wetlands – There are no wetland or transitional agricultural lands located in the immediate project vicinity. A seasonally flooded palustrine wetland is located approximately 800 feet away from the project site. Due to these circumstances, the project will not impact wetlands or transitional agricultural lands and is consistent with these resource protection policies.
- j) §5.30 Rural Plan Designations – Agriculture Exclusive/Grazing Lands (1) – AEG(1) allows for production of food, fiber, or plants, with residence as a use incidental to this activity, including two separate residences where one is occupied by the owner/operator and the other by the parent or child of the owner/operator. The project involves a continuation of cannabis cultivation, originally part of a CUP to change of use from one type of agricultural use to another, namely a former flower farm to cannabis cultivation. The site has one (1) existing residence with no nexus to cannabis.

#### **ZONING COMPLIANCE AND CONFORMITY WITH APPLICABLE STANDARDS AND REQUIREMENTS OF THESE REGULATIONS**

##### **4. FINDING:**

The proposed development is consistent with the purposes of the existing zone and combining zone in which the site is located and conforms with all applicable standards and requirements of the zoning

regulations.

- EVIDENCE:**
- a) The subject parcel known as APN 308-131-012 and 308-131-020 is comprised of one separate legal parcel created by Notice of Merger recorded on February 29, 1980, in Book 1605 of Official Records at Page 886. Therefore, the subject parcel was lawfully created in its current configuration and can be developed as proposed.
  - b) §313.7.1 Use Regulations – The Agriculture Exclusive (AE) zone principally permits general agriculture, single family residential, and timber production. The subject parcel was granted a CUP and CDP in 2020 (CUP16-139), permitting a change of uses from orchid production to cannabis cultivation. While that CUP and CDP have since been revoked, this proposed project replicates the former cannabis production footprint and operations and is therefore simply a continuation of cannabis production. The use of the site will remain agricultural, and the project is therefore consistent with the Agricultural Exclusive zone district. Since there is a new applicant/permit holder, in accordance with the CCCLUO, the project requires a CUP and a CDP to legally be permitted for commercial cannabis production.
  - c) §313.7.1 Development Standards – The AE-160/A,W,T designation meets the standards as follows: (i) The legal parcel is 26.1 acres, below the 160 acre minimum parcel size, but the project will not further reduce the existing non-conformity; (ii) Maximum Ground Coverage, Minimum Lot Width, Maximum Lot Depth, and Maximum Building Height are not enumerated, therefore the project is in conformity; (iii) Minimum Yard Setbacks are listed below:

Front: 20 feet	Proposed: 120 feet
Rear: 30 feet	Proposed: 770 feet
Interior Side: 30 feet	Proposed: 370 feet
Exterior Side: 20 feet	Proposed: 180 feet
SRA setback: 30 feet	Proposed: setbacks met
  - d) “A” Combining zone - No additional structures are proposed. A Cultural Resource Survey conducted by William Rich and Associates found that no potential significant cultural resources were identified at the project site and no project-specific recommendations are warranted. No new construction is proposed, and no ground disturbance will occur. Nonetheless, the project is conditioned to include an inadvertent discovery protocol should the project encounter undocumented cultural

resources.

- e) "W" Combining zone - The project area is located at least 800 feet from the nearest mapped wetland which is located on an adjacent property. No negative impacts to sensitive biological resources are anticipated.
- f) "T" Combining zone - The project area is located at least 3,800 feet from the nearest mapped transitional agriculture land which is located on an adjacent property. No negative impacts to sensitive biological resources are anticipated.
- g) §313-121 Geologic Hazard Regulations – The project area is classified as low instability. The proposed project will not alter the land nor contribute to erosion, geological instability, or the destruction of development sites in the vicinity, and is therefore in conformity.
- h) §313-125 Wetland Buffer Areas - The proposed project is situated upland from the surrounding parcels where mapped wetlands exist. The closest NWI wetland is approximately 800 feet west on an adjacent parcel and the closest Farmed Wetland is 3,000 feet northeast on an adjacent parcel. The proposed cannabis operation does not encroach upon any of these buffer areas, and none of the employees or participants of the proposed project will have access beyond the project site, therefore no negative impacts to sensitive biological resources are anticipated.

**§313-55.4 COMMERCIAL CULTIVATION, PROCESSING, MANUFACTURING, DISTRIBUTION, TESTING AND SALE OF CANNABIS LAND USE REGULATION FOR THE COASTAL ZONE OF THE COUNTY OF HUMBOLDT – COASTAL COMMERCIAL CANNABIS LAND USE ORDINANCE (CCCLUO)**

**5. FINDING:** The proposed development is consistent with the requirements of the CCCLUO Provisions of the Zoning Ordinance.

- EVIDENCE:**
- a) §313-55.4.5 General Provisions – The project is located more than 600 feet away from any schools and is not located on Tribal Lands. There are no ESHA or coastal wetlands within 100 feet of the project site and no negative impacts to sensitive biological resources are anticipated. According to records maintained by the Planning Department, the applicant, submitted one (1) application for a commercial cannabis permit.
  - b) §313-55.4.6.1 Eligibility Criteria, AE – The proposed project is consistent with the Agriculture Exclusive zoning designation as well as the parcel size and cultivation area standards.

- c) §313-55.4.6.3 Siting Criteria – The project sources water from a permitted groundwater well, the access road is consistent with a Category 4 road standard, and the project has been conditioned to meet the Energy Source criteria.
- d) §313-55.4.6.4 Siting Criteria – The cultivation site has a slope of less than 15 percent and there is no removal of timber associated with the project. The prime agricultural soils being utilized do not exceed 20% of the area of Prime Agricultural Soil on the Parcel or legal lot. Removal/replacement of native soils is not proposed.
- e) §313-55.4.6.4.4 Standard Setbacks – All setbacks for the proposed cannabis cultivation project meet the standards outlined in the ordinance. All cultivation is at least 30 feet from all property lines and there are no public parks, churches, school bus stops or other sensitive receptors within 600 feet of the cultivation areas.
- f) §313-55.4.6.8 Cap on Permits – This section sets a cap of 112 permits and 39 acres of cannabis cultivation in the Eel River Area Plan (ERAP). This project is under 1 acre of total cultivation area (38,465 sq. ft). The water is sourced from a permitted groundwater well. Once approved this will be the second permitted cannabis project in the ERAP and less than 1.5 permitted acres of cultivation will be in existence in the ERAP.
- g) §313-55.4.12.1.10 Performance Standards, Biological Resource Protections – No new development is proposed. No biological reconnaissance survey was carried out or submitted due to lack of ground disturbance associated with this project. The CNDB did not show any avian or mammalian species of concern on or adjacent to the property. Two special-status plants were identified on the parcel, but no further ground-disturbance is associated with this project, thus little likelihood of impact.
- h) §313-55.4.12.1.12-15 Performance Standards – A Site Drainage Plan has been included as a section of the Cultivation and Operations Plan for the project, noting enrollment with SWRCB; The project has been conditioned to properly dispose of project-related wastes that conforms the to the Management of Waste and Hazardous Materials Performance Standards; No new construction is proposed, so no ground disturbance will occur. Nonetheless, the project is conditioned to include an inadvertent discovery protocol should the project encounter undocumented cultural resources.



- i) §313-55.4.12.2 General Standards – The proposed project is projected to operate in conformance with the specified General Standards applicable to all Commercial Cannabis Activities 55.4.12.1-8 for the Eel River Area Plan (Coastal).
- j) §313-55.4.12.4-5 Performance Standards – The project has been conditioned to comply with the International Dark Sky Association standards. Electricity will be supplied by Pacific Gas and Electric Company (PG&E) and the cited performance standard is incorporated into the Conditions of Approval.
- k) §313-55.4.12.6 Performance Standards, Noise – The applicant measured the ambient noise produced for the existing use at each property line with all cultivation fans running. Maximum noise levels ranged from approximately 59 to 74 dBA. It is anticipated that these measured noise levels represent a typical day of commercial cannabis cultivation activities associated with the proposed project. Noise from the proposed cultivation activities is not anticipated to result in any increase in sound level above existing ambient noise levels.
- l) §313-55.4.12.7-8 Performance Standards, Irrigation – Water for this project is sourced from a permitted groundwater well and the applicant has provided a monthly and annual budget for water. The project has been conditioned to require metering and record keeping of water use. All water storage equipment and facilities are proposed to conform to the Standards for Water Storage a) through f).
- m) §313-55.4.12.9 Performance Standards, Wells – The well being utilized for cultivation, irrigation, and domestic purposes is a permitted groundwater well. As the parcel is under 40 acres in size and the well is within 400 feet of a property line, a groundwater drawdown test was completed. A drawdown test was completed on January 20, 2020 by Watson Well Service using an adjacent well located approximately 3,327 feet southwest from the subject well. The well was pumped continuously at 33 gallons per minute for 8 hours. The subject well stabilized after ten minutes of pumping and held static for the remainder of the test, and the monitoring well showed no change in static water level throughout the test. On October 25 and 29, 2024 Fisch Drilling and Pump conducted two separate water production tests with drawdown and recovery. The nearest neighboring well was monitored, as part of the October 29th well test, with a Heron Instruments Inc. Groundwater Data Logger during the well test and for an additional 70 hours after cessation of pumping. During the October 25th test, the well was pumped at an average of

about 28.0 gallons per minute (gpm) for 11.7 hours with a total drawdown of 9.1 ft. The well recovered quickly, 11 minutes after the cessation of pumping. During the October 29th test, the well was pumped at an average of about 30.5 gpm for 11.7 hours with a total drawdown of 7.1 ft. The well recovered quickly, 4 minutes after the cessation of pumping. It was concluded that using the proposed water source for the proposed irrigation activities would not have an impact on the surrounding wells. Testing reports are included as attachments.

- n) §313-55.4.12.10-16 Performance Standards – The project has been conditioned to provide a soil management plan detailing the use of imported and native soil on the parcels or premises. The project utilizes the same footprint as the previously permitted operation, so no reconfiguration is required or proposed. The project has been conditioned such that the applicant identifies and eradicate invasive plant species classified as invasive by the California Invasive Plant Council.

#### **FINDINGS APPLICABLE TO ALL PERMITS**

- 6. **FINDING:** §312-17.1.4 Public Health, Safety and Welfare - There is no indication that the proposed project will be detrimental to the public health, safety, or welfare or materially injurious to properties or improvements in the vicinity.

- EVIDENCE:** a) The proposed project includes an operations plan that mirrors a previously approved cannabis cultivation permit, with no alterations to the project site, water usage, waste disposal, employment conditions or other. No detrimental conditions to public health, safety or welfare have been identified nor is the proposed project expected to have a detrimental effect on neighboring property values. The proposed project complies with all development standards of the zone and is therefore in compliance.

- 7. **FINDING:** §312-17.1.5 Residential Density – The proposed project does not reduce the residential density for the parcel below that utilized by the Department of Housing and Community Development in determining compliance with housing element law.

- EVIDENCE:** a) The parcel was not included in the housing inventory of Humboldt County's 2019 Housing Element.
- b) The project is proposing to continue agricultural production on an existing parcel that is zoned Agriculture Exclusive. An existing residence is on the

parcel but not affiliated with the proposed project. The existing residence will remain unchanged and approval of cannabis cultivation on this parcel will have no impact on compliance with the standards in the Housing Element.

## **SUPPLEMENTAL FINDINGS**

**8. FINDING:** §312-30.1 Coastal Zone Agriculture Use Type – The proposed use will not impair the continued agricultural use on the subject property, or on adjacent lands, or the economic viability of agricultural operations on the site.

**EVIDENCE:** a) The Agriculture Exclusive (AE) zone principally permits general agriculture, single family residential, and timber production. The parcel was previously approved for cannabis cultivation under PLN-11065-CUP. The proposed project continues agricultural operations (cannabis cultivation) within the existing footprint of the original project with no new ground disturbance proposed. The 2121, LLC proposal does not include any increase in cultivation area, water use, or electrical consumption.

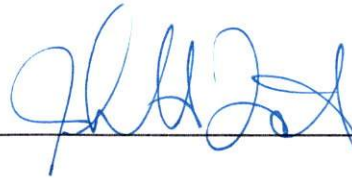
## DECISION

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

1. Adopts the findings set forth in this resolution; and
2. Conditionally approves the Conditional Use Permit and Coastal Development Permit (Record Number: PLN-2025-19144), and subject to the recommended conditions of approval attached hereto as Attachment 1A.

Adopted after review and consideration of all the evidence on **March 6, 2024**.

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



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John H. Ford, Director  
Planning and Building Department

## CONDITIONS OF APPROVAL

### **APPROVAL OF THE CONDITIONAL USE PERMIT AND COASTAL DEVELOPMENT PERMIT IS CONDITIONED ON THE FOLLOWING TERMS AND REQUIREMENTS WHICH MUST BE SATISFIED BEFORE CULTIVATION CAN OCCUR AND WHICH REMAIN IN PLACE DURING OPERATION.**

1. The Applicant shall install a water meter and record water use on a monthly basis. To demonstrate there is sufficient water supply to meet the demands of the project the applicant shall verify the static water level of the well to determine if the ground water level remains constant. As part of the annual inspection, the applicant shall present water use records and static water level for the well.
2. All fences and gates shall be relocated out of the County right of way. All gates shall be setback sufficiently from the County road so that vehicles will not block traffic when staging to open/close the gate. In addition, no materials shall be stored or placed in the County right of way. This condition shall be completed to the satisfaction of the Department of Public Works prior to commencing operations, final sign-off for a building permit, or Public Works approval for a business license.
3. All driveways and private road intersections onto the County Road shall be maintained in accordance with County Code Section 341-1 (Sight Visibility Ordinance). This condition shall be completed to the satisfaction of the Department of Public Works prior to commencing operations, final sign-off for a building permit, or Public Works approval for a business license.
4. Applicant shall demonstrate that the existing permitted onsite wastewater treatment system (OWTS) is sized to accommodate the additional anticipated wastewater flow rate generated by operations staff. If the existing OWTS is determined to be undersized, applicant shall obtain an OWTS Modification Permit and install the modifications necessary to accommodate peak wastewater demand.
5. The applicant shall submit one copy of the final Site Management Plan (SMP) to the Planning and Building Department. The applicant shall implement all corrective actions detailed within the SMP developed for the parcel, prepared pursuant to Tier 2 enrollment under the North Coast Regional Water Quality Control Board Cannabis

Cultivation Waste Discharge Regulatory Program, including those measures determined necessary during annual and periodic site inspections in accordance with the monitoring element. A copy of the report form portion of the Mitigation and Reporting Program (MRP) shall be submitted annually to the Planning and Building Department concurrent with the submittal to the NCRWQCB. A letter or similar communication from the NCRWQCB or the third-party Consultant verifying that all their requirements have been met will satisfy this condition. [After July 31, 2019, plans and reporting shall conform to the Cannabis Cultivation Policy and Cannabis General Order adopted October 17, 2017, by the State Water Board.]

6. The applicant shall provide a soil management plan detailing the use of imported and native soil on the parcels or premises. The plan shall provide accounting for the annual and seasonal volume of soil that is imported and exported and documentation of the approved location of any parcel(s) utilized for off-site disposal of spent soil if this occurs or is proposed.
7. The Applicant shall demonstrate the driveway and emergency vehicle turn around, signing and building numbers, conforming access to the planned 2,500-gallon tank for emergency water, and fuel modification standards conform with the Humboldt County Code Section 3112-12, the Fire Safe Regulations. The Applicant shall be responsible for implementing any necessary improvements to bring the driveway and emergency vehicle turn around into compliance. A letter from a qualified engineer shall satisfy this requirement.
8. The property owner shall execute and file with the Planning Division the statement titled, "Notice and Acknowledgment regarding Agricultural Activities in Humboldt County," ("Right to Farm" ordinance) as required by the HCC and available at the Planning Division.
9. A review fee for Conformance with Conditions as set forth in the schedule of fees and charges as adopted by ordinance of the Humboldt County Board of Supervisors shall be paid to the Humboldt County Planning Division, 3015 "H" Street, Eureka. This fee is a deposit, and if actual review costs exceed this amount, additional fees will be billed at the County's current burdened hourly rate.

10. The Applicant is responsible for obtaining all necessary County and State permits and licenses, and for meeting all of the requirements as set forth by other regulatory agencies.
11. The Applicant is required to pay for permit processing on a time and material basis as set forth in the schedule of fees and charges as adopted by ordinance of the Humboldt County Board of Supervisors. The Department will provide a bill to the Applicant after the decision. Any and all outstanding Planning fees to cover the processing of the application to decision by the Hearing Officer shall be paid to the Humboldt County Planning Division, 3015 "H" Street, Eureka.
12. A Notice of Determination (NOD) will be prepared and filed with the County Clerk for this project in accordance with the State CEQA Guidelines. **Within three days of the effective date of permit approval**, the Department will file the NOD and will charge this cost to the project.
13. No full sun outdoor (outside greenhouses) is permitted under this permit, and any additional greenhouse expansion will require additional CDP approval and demonstration of consistency with 313-55.4.6.1.2-(b).

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

1. All components of project shall be developed, operated, and maintained in conformance with the Project Description, the approved Site Plan, the Plan of Operations, and these conditions of approval. Changes shall require modification of this permit except where consistent with Humboldt County Code Section 312-11.1, Minor Deviations to Approved Plot Plan.
2. Future signage proposals are subject to review and approval by the Planning Director.
3. The applicant shall arrange for a cultural monitor from the Wiyot Tribe to be present during any ground disturbing activities associated with the project. Evidence of such

an arrangement shall be submitted to the Planning and Building Department prior to issuance of any future grading or building permit.

4. Cannabis cultivation and other commercial cannabis activity shall be conducted in compliance with all laws and regulations as set forth in the CCCLUO and MAUCRSA, as applicable to the permit type.
5. Prohibition on use of synthetic netting. To minimize the risk of wildlife entrapment, Permittee shall not use any erosion control materials that contain synthetic (e.g., plastic or nylon) netting, including photo- or biodegradable plastic netting. Geotextiles, fiber rolls, and other erosion control measures shall be made of loose-weave mesh, such as jute, hemp, coconut (coir) fiber, or other products without welded weaves.
6. The environmental impacts of improper waste disposal are significant and well documented. All refuse be contained in wildlife proof storage containers, at all times, and disposed of at an authorized waste management facility.
7. The noise produced by any generator used on an emergency-only basis for cannabis drying, curing, and processing shall not be audible by humans from neighboring residences. The decibel level for generators measured at the property line shall be no more than 60 decibels. Where applicable, sound levels must also show that they will not result in the harassment of Marbled Murrelet or Spotted Owl species. Conformance will be evaluated using current auditory disturbance guidance prepared by the United State Fish and Wildlife Service, and further consultation where necessary. Under these guidelines, generator noise may not exceed 50dB as measured at 100 feet from the generator or at the edge of the nearest Marbled Murrelet or Spotted Owl habitat, whichever is closer.
8. Any existing on-site lighting or proposed lighting upgrades in the future, shall be fully shielded and designed and installed to minimize off-site lighting and direct light within the property boundaries. Light shall not escape at a level that is visible from neighboring properties between sunset and sunrise. The light source should comply with the International Dark Sky Association standards for Lighting Zone 0 and Lighting Zone 1 and be designed to regulate light spillage onto neighboring properties resulting from backlight, uplight, or glare (BUG). Should the Humboldt County Planning Division



receive complaints that the lighting is out of alignment or not complying with these standards, within ten (10) working days of receiving written notification that a complaint has been filed, the applicant shall submit written verification that the lights' shielding, and alignment has been repaired, inspected, and corrected as necessary.

9. This permit does not authorize the use of Anticoagulant rodenticides on the subject parcel. Anticoagulant rodenticides are prohibited.
10. Confinement of the area of cannabis cultivation, processing, manufacture or distribution to the locations depicted on the approved site plan. The commercial cannabis activity shall be set back at least 30 feet from any property line, and 600 feet from any School, School Bus Stop, Church or other Place of Religious Worship, or Tribal Cultural Resources, except where a reduction to this setback has been approved pursuant to Section 55.4.11(d).
11. Maintain enrollment in Tier 1, 2 or 3, certification with the North Coast Regional Water Quality Control Board (NCRWQCB) Order No. R1-2015-0023, if applicable, or any substantially equivalent rule that may be subsequently adopted by the County of Humboldt or other responsible agency. [After July 31, 2019, plans and reporting shall conform to the Cannabis Cultivation Policy and Cannabis General Order adopted October 17, 2017 by the State Water Board.]
12. Electricity will be supplied by Pacific Gas and Electric Company (PG&E). The applicant is required to conform to one or more of the following: 1) Grid power supplied from 100% renewable source, 2) on-site renewable energy system with up to twenty percent net non-renewable energy use, 3) grid power supplied by partial or whole non-renewable source with purchase of carbon offset credits. Note: purchase of carbon offset credits (for grid power procured from non-renewable producers) may only be made from reputable sourced, including those found on Offset Project Registries managed by the California Air Resources Board, or similar sources and programs determined to provide bona fide offsets recognized by relevant state regulatory agencies. The operator shall provide evidence of compliance with this condition at each annual county inspection.

13. Consent to an annual on-site compliance inspection, with at least 24 hours prior notice, to be conducted by appropriate County officials during regular business hours (Monday – Friday, 9:00 am – 5:00 pm, excluding holidays).
14. If any wildlife is encountered during the authorized activity, the Applicant shall not disturb the wildlife and shall allow wildlife to leave the work site unharmed.
15. Storage of Fuel - Fuel shall be stored and handled in compliance with applicable state and local laws and regulations, including the County of Humboldt's CUPA program, and in such a way that no spillage occurs.
16. The Master Log Books maintained by the Applicant to track production and sales shall be maintained for inspection by the County.
17. The applicant shall be compliant with the County of Humboldt's Certified Unified Program Agency (CUPA) requirements regarding any hazardous materials including fuel. A written verification of compliance shall be required before any provisional permits may be finalized. Ongoing proof of compliance with this condition shall be required at each annual inspection in order to keep the permit valid.
18. Pay all applicable application and annual inspection fees.
19. Pay all applicable taxes as required by the Humboldt County Commercial Marijuana Cultivation Tax Ordinance (Humboldt County Code Section 719-1 et seq.).
20. The applicant is required to pay for permit processing on a time and material basis as set forth in the schedule of fees and charges as adopted by ordinance of the Humboldt County Board of Supervisors. The Department will provide a bill to the applicant after the decision. Any and all outstanding Planning fees to cover the processing of the application to decision by the Hearing Officer shall be paid to the Humboldt County Planning Division, 3015 "H" Street, Eureka.

#### **Performance Standards for Cultivation and Processing Operations**

21. Pursuant to the MAUCRSA, Health and Safety Code section 19322(a)(9), an Applicant seeking a cultivation license shall "provide a statement declaring the Applicant is an

‘agricultural employer,’ as defined in the Alatorre-Zenovich-Dunlap-Berman Agricultural Labor Relations Act of 1975 (Part 3.5 commencing with Section 1140) of Division 2 of the Labor Code), to the extent not prohibited by law.”

22. Cultivators shall comply with all applicable federal, state, and local laws and regulations governing California Agricultural Employers, which may include: federal and state wage and hour laws, CAL/OSHA, OSHA, California Agricultural Labor Relations Act, and the Humboldt County Code (including the Building Code).

23. All persons hiring employees to engage in commercial cannabis cultivation and processing shall comply with the following Employee Safety Practices:

I. Cultivation operations and processing operations must implement safety protocols and provide all employees with adequate safety training relevant to their specific job functions, which may include:

- (a) Emergency action response planning as necessary;
- (b) Employee accident reporting and investigation policies;
- (c) Fire prevention;
- (d) Hazard communication policies, including maintenance of material safety data sheets (MSDS);
- (e) Materials handling policies;
- (f) Job hazard analyses; and
- (g) Personal protective equipment policies, including respiratory protection.

II. Cultivation operations and processing operations must visibly post and maintain an emergency contact list which includes at a minimum:

- (a) Operation manager contacts;
- (b) Emergency responder contacts;
- (c) Poison control contacts.

III. At all times, employees shall have access to safe drinking water and toilets and handwashing facilities that comply with applicable federal, state, and local laws and regulations. Plumbing facilities and water source must be capable of handling increased usage without adverse consequences to neighboring properties or the environment.

IV. On site-housing provided to employees shall comply with all applicable federal, state, and local laws and regulations.

24. Term of Commercial Cannabis Activity Conditional Use Permit. Authorization for any Commercial Cannabis Activity Zoning Clearance Certificate, Special Permit, Coastal Development Permit or Use Permit issued pursuant to this section shall expire terminate after one (1) year after date of issuance, and on the anniversary date of such issuance each year thereafter, unless an annual compliance inspection has been conducted and the permitted site has been found to comply with all conditions of approval, applicable eligibility and siting criteria, and performance standards.

25. Annual compliance inspections are required, pursuant to section 55.4.5.6 above. If the inspector or other County official determines that the site does not comply with the conditions of approval, the inspector shall serve the clearance certificate or permit holder with a written statement identifying the items not in compliance, and the action that the permit holder may take to cure the non-compliance and the time period within which the non-compliance must be corrected. The statement shall also advise the clearance certificate or permit holder of their right to file an appeal of the non-compliance statement within ten (10) calendar days of the date that the written statement is delivered to the permit holder, or after the date of any reinspection if there is a dispute about whether or not the corrections have been completed. Email, personal delivery, or mail are appropriate means of delivering the written statement. Where mailed or emailed, the written statement shall be sent to the most current mailing address or email shared with the Department by the operator. The statement shall be considered to be delivered 3 days following the postmarked date of mailing or verification of email transmittal. The permit holder may request a re-inspection to determine whether or not the permit holder has cured all issues of non-compliance. Failure to request re-inspection and cure any items of non-compliance within the prescribed timeframes, or to timely file an appeal, shall terminate the Zoning Clearance Certificate, Special Permit, Coastal Development Permit or Use Permit, immediately upon the expiration of any appeal period, or final determination of the appeal if an appeal has been timely filed.

26. Permit Renewals to comply with Updated Laws and Regulations. Permit renewal per Ongoing Condition of Approval #18 above is subject to the laws and regulations effective at the time of renewal, which may be substantially different than the regulations currently in place and may require the submittal of additional information to ensure that new standards are met.
27. Acknowledgements to Remain in Full Force and Effect. Permittee acknowledges that the County reserves the right to reduce the size of the area allowed for cultivation under any clearance or permit issued in accordance with this Section in the event that environmental conditions, such as a sustained drought or low flows in the watershed in which the cultivation area is located will not support the proposed levels of groundwater-sourced irrigation.
28. Transfer of any leases or permits approved by this project is subject to the review and approval of the Planning Director for conformance with CCCLUO eligibility requirements, and agreement to permit terms and acknowledgments. The fee for required conformance with conditions review shall accompany the request. The request shall include the following information:
- a) Identifying information for the new Owner(s) and management as required in an initial permit application;
  - b) A written acknowledgment by the new Owner in accordance as required for the initial Permit application;
  - c) The specific date on which the transfer is to occur; and
  - d) Acknowledgement of full responsibility for complying with the existing Permit; and
  - e) Execution of an Affidavit of Non-diversion of Medical Cannabis.
29. Inspections. The permit holder and subject property owner are to permit the County or representative(s) or designee(s) to make inspections with a minimum of 24 hours notice to assure that the activities being performed under the authority of this permit are in accordance with the terms and conditions prescribed herein.

### **Informational Notes:**

1. Pursuant to Section 314-55.4.6.5.7 of the CCCLUO, if upon inspection for the initial application, violations of any building or other health, safety, or other state or county statute, ordinance, or regulation are discovered, the Planning and Building Department may issue a provisional clearance or permit with a written approved Compliance Agreement. By signing the agreement, the permittee agrees to abate or cure the violations at the earliest opportunity but in no event more than two (2) years of the date of issuance of the provisional clearance or permit. Plans for curing the violations shall be submitted to the Planning and Building Department by the Permittee within one (1) year of the issuance of the provisional certificate or permit. The terms of the compliance agreement may be appealed pursuant to section 314-55.4.6.5.5 of the CCCLUO.
2. This permit shall expire and become null and void at the expiration of one (1) year after all appeal periods have lapsed (see "Effective Date"); except where construction under a valid building permit or use in reliance on the permit has commenced prior to such anniversary date. The period within which construction or use must be commenced may be extended as provided by Section 312-10.5 of the Humboldt County Code.
3. The Applicant is responsible for costs for post-approval review for determining project conformance with conditions prior to release of building permit or initiation of use and at time of annual inspection. In order to demonstrate that all conditions have been satisfied, applicant is required to pay the conformance review deposit as set forth in the schedule of fees and charges as adopted by ordinance of the Humboldt County Board of Supervisors within sixty (60) days of the effective date of the permit or upon filing of the Compliance Agreement (where applicable), whichever occurs first. Payment shall be made to the Humboldt County Planning Division, 3015 "H" Street, Eureka.
4. If cultural resources are encountered during construction activities, the contractor on site shall cease all work in the immediate area and within a 50-foot buffer of the discovery location. A qualified archaeologist as well as the appropriate Tribal Historic Preservation Officer(s) are to be contacted to evaluate the discovery and, in consultation with the applicant and lead agency, develop a treatment plan in any instance where significant impacts cannot be avoided. The Planning and Building

Department shall provide information regarding the appropriate Tribal point(s) of contact for a specific area. Prehistoric materials may include obsidian or chert flakes, tools, locally darkened midden soils, groundstone artifacts, shellfish or faunal remains, and human burials. If human remains are found, California Health and Safety Code 7050.5 requires that the County Coroner be contacted immediately.

5. If a paleontological discovery is made during construction, the contractor shall immediately cease all work activities in the vicinity (within approximately 100 feet) of the discovery and shall immediately contact the County. A qualified paleontologist shall be retained to observe all subsequent grading and excavation activities in the area of the find and shall salvage fossils as necessary. The paleontologist shall establish procedures for paleontological resource surveillance and shall establish, in cooperation with the project developer, procedures for temporarily halting or redirecting work to permit sampling, identification, and evaluation of fossils. If major paleontological resources are discovered that require temporarily halting or redirecting of grading, the paleontologist shall report such findings to the County. The paleontologist shall determine appropriate actions, in cooperation with the applicant and the County, that ensure proper exploration and/or salvage.



2121, LLC  
APNs: 308-131-012 AND 308-131-020  
CULTIVATION AND OPERATIONS MANUAL  
HUMBOLDT COUNTY, CA

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COMMERCIAL CANNABIS  
CULTIVATION FACILITIES

PREPARED FOR:



January 2025



**Commercial Cannabis Cultivation Facilities**

APN: 308-131-012 and 308-131-020

Lead Agency:

***Humboldt County Planning Department***

3015 H Street  
Eureka, CA 95501

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**January 2025**

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Contents

**2121, LLC** ..... ERROR! BOOKMARK NOT DEFINED.

**APNS: 308-131-012 AND 308-131-020** ..... **1**

**CULTIVATION AND OPERATIONS MANUAL**..... **1**

**HUMBOLDT COUNTY, CA**..... **1**

---

**COMMERCIAL CANNABIS** ..... **1**

**CULTIVATION FACILITIES** ..... **1**

**1. PROJECT SUMMARY** ..... **5**

1.1. PROJECT OBJECTIVE..... 5

1.2. SITE DESCRIPTION..... 5

1.3. LAND USE..... 5

1.4. STATE AND LOCAL COMPLIANCE..... 5

    1.4.1. Department of Cannabis Control – CalCannabis ..... 5

    1.4.2. State Water Resources Control Board – Water Rights ..... 5

    1.4.3. State Water Resources Control Board and North Coast Regional Water Quality Control Board – Water Quality ..... 5

    1.4.4. Humboldt County Building Department..... 6

    1.4.5. Cal Fire ..... 6

    1.4.6. California Department of Fish and Wildlife ..... 6

    1.4.7. Cultural Resources ..... 6

**2. CULTIVATION AND PROCESSING** ..... **6**

2.1. PROPAGATION AND INITIAL TRANSPLANT ..... 6

2.2. OUTDOOR CULTIVATION PLAN ..... 7

2.3. IRRIGATION PLAN AND SCHEDULE ..... 7

2.4. PROCESSING (HARVESTING, DRYING AND TRIMMING) ..... 7

2.5. EMPLOYEE PLAN ..... 7

    2.5.1. Job Descriptions And Employee Summary ..... 7

    2.5.2. Staffing Requirements ..... 7

    2.5.3. Employee Training and Safety ..... 8

    2.5.4. Toilet and Handwashing Facilities ..... 8

    2.5.5. On Site Housing ..... 8

    2.5.6. Parking Plan ..... 8

2.6. SECURITY PLAN AND HOURS OF OPERATION..... 8

    2.6.1. Facility Security..... 8

    2.6.2. Hours of Operation..... 8

**3. ENVIRONMENT** ..... **9**

3.1. WATER SOURCE, STORAGE, AND PROJECTED USE..... 9

    3.1.1. Site Drainage, Runoff, and Erosion Control ..... 9

    3.1.2. Stormwater Management Plan ..... 9

    3.1.3. Erosion Control ..... 10

3.2. WATERSHED AND HABITAT PROTECTION ..... 10

3.3. INVASIVE VEGETATIVE SPECIES CONTROL PLAN ..... 10

3.4. MATERIALS MANAGEMENT PLAN ..... 11

3.5. SOILS MANAGEMENT PLAN ..... 11

3.6. HAZARDOUS WASTE STATEMENT ..... 11

3.7. ENERGY PLAN ..... 12

3.8. WASTE MANAGEMENT ..... 12

    3.8.1. Cultivation ..... 12

    3.8.2. Sewage Disposal Plan ..... 12

**4. PRODUCT MANAGEMENT ..... 12**

4.1. PRODUCT TESTING AND LABELING ..... 12

4.2. PRODUCT INVENTORY AND TRACKING ..... 12

4.3. TRANSPORTATION AND DISTRIBUTION ..... 12

APPENDICES

Appendix A: Site Map

Appendix B: Cultivation Activities Schedule

Appendix C: References

## 1. PROJECT SUMMARY

### 1.1. PROJECT OBJECTIVE

2121, LLC seeks approval for a Conditional Use Permit (CUP) and Coastal Development Permit for a new owner and operator. The proposed project involves 28,656 square feet of existing mixed-light cultivation within an existing greenhouse, and an additional 9,800 square feet of outdoor cultivation within existing hoop houses. The parcel had an existing approved cannabis cultivation operation (PLN-11065-CUP) for the conversion of a commercial flower farm to a commercial cannabis cultivation operation. 2121, LLC's proposal does not include an increase in cultivation size, water use, electrical use, or numbers of required employees. The project is proposed to operate in the existing footprint permit of the previously approved PLN-11065-CUP.

### 1.2. SITE DESCRIPTION

The project is located at 2121 Table Bluff Road, Loleta, CA, on Assessor Parcel Numbers (APNs) 308-131-012 and 308-131-020. The site encompasses a total of 6.53 acres, with an adjoining parcel of 21.59 acres. The terrain is relatively level with a 0-5% slope. The land has been historically used for agricultural purposes, including dairying and pasturage. The site is zoned Agricultural Exclusive with minimum 160-acre parcel sizes and lies within the Coastal Wetlands Special Combining Zones.

### 1.3. LAND USE

The project area is zoned as Agricultural Exclusive (AE-160) and falls under the jurisdiction of the Eel River Area Plan (ERAP). The primary land use surrounding the parcel is agricultural production. Soils on-site are classified as Rohnerville silty loam, and the parcel has been used historically for farming.

### 1.4. STATE AND LOCAL COMPLIANCE

#### 1.4.1. DEPARTMENT OF CANNABIS CONTROL – CALCANNABIS

2121, LLC will obtain the necessary licensing for commercial cannabis activities from the California Department of Cannabis Control. The proposed cultivation complies with state regulations.

#### 1.4.2. STATE WATER RESOURCES CONTROL BOARD – WATER RIGHTS

Water for cultivation and domestic use is sourced from a permitted on-site well and recaptured water from the project's dehumidifiers. The project's irrigation method is primarily hand-watering, with projected annual water usage of 266,300 gallons.

No diversionary water source is proposed for this project.

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

The project is enrolled in the North Coast Regional Water Quality Control Board's Cannabis Waste Discharge Program as a Tier 2 discharger. The property's stormwater management plan follows best practices to prevent runoff and erosion.

The applicant is enrolled for coverage as a Tier 2, Low Risk (WDID: 1\_12CC406605) under the SWRCB General Order WQ 2019-0001-DWQ *General Waste Discharge Requirements and Waiver of Waste Discharge Requirements for Dischargers of Waste Associated with Cannabis Cultivation Activities* Order. The purpose of the SWRCB Order is to implement the requirements for waste discharges associated with cannabis cultivation as described in SWRCB's *Cannabis Cultivation Policy – Principles*

*and Guidelines for Cannabis Cultivation* ("Policy"). Prior to the commencement of cultivation operations, a Site Management Plan will be developed for the property to describe how the discharger is complying with the applicable Best Practicable Treatment or Control (BPTC) Measures listed in Attachment A of the Order/Policy.

The Tier 2, Low Risk discharger status reflects current operations that disturb greater than one acre. The applicant's proposal will keep all cultivation activities out of riparian setbacks to maintain Low Risk status with SWRCB.

#### **1.4.4. HUMBOLDT COUNTY BUILDING DEPARTMENT**

Upon approval, all necessary building permits will be obtained from the Humboldt County Building Department. Any modifications or expansions will comply with county codes.

#### **1.4.5. CAL FIRE**

The subject property is located within a State Responsibility Area (SRA) for fire protection. All structures on the property meet the 30-foot SRA setback requirement from property lines. The project proposes a designated fire turn-around and pull-out area for emergency vehicles and one (1) 2,500-gallon water tank dedicated to SRA emergency response. If needed, risers to SRA specifications will be installed for firefighting purposes.

#### **1.4.6. CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE**

A Lake and Streambed Alteration Agreement (LSAA) was notified to the Department of Fish and Wildlife for no jurisdiction items. There are no stream crossings or points of diversion on the parcel. The applicant received a letter dated 11/5/2024 from the Department of Fish and Wildlife stating that a "Notification was not required because your project is not subject to the notification requirement in Fish and Game Code section 1602".

#### **1.4.7. CULTURAL RESOURCES**

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

## **2. CULTIVATION AND PROCESSING**

### **2.1. PROPAGATION AND INITIAL TRANSPLANT**

2121, LLC plans to propagate juvenile plants on-site from seeds and mother plants. These will be placed in a designated nursery areas within the 36.5'x97'greenhouse. After an initial propagation phase, cuttings will be transplanted to the final growing beds where they will mature. The initial transplant will occur after plants have developed sufficient root systems, ensuring a successful transfer to full sunlight or mixed-light environments.

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

## **2.2. OUTDOOR CULTIVATION PLAN**

The project involves 28,656 square feet of mixed-light cultivation within existing greenhouses and 9,800 square feet of outdoor cultivation within hoop houses for a total of 38,456 sq. ft. The cultivation cycle is projected to run two to three cycles annually for the hoop houses and mixed light cultivation greenhouses. Greenhouses will utilize blackout tarps and light shielding to comply with local light pollution regulations. The monthly Cultivation Schedule in Appendix C details the cultivation activities associated.

## **2.3. IRRIGATION PLAN AND SCHEDULE**

Water is sourced from a permitted on-site well and supplemented during peak demands with the recapture of water the dehumidifiers in the greenhouses. The projected water use is 266,300 gallons annually, with hand-watering as the primary method and drip irrigation used where needed. This method ensures efficient water use and minimizes runoff. The project will store up to 20,000 gallons of water in storage tanks. 20,000 gallons of water storage represent approximately 8 days of storage during peak demand.

## **2.4. PROCESSING (HARVESTING, DRYING AND TRIMMING)**

Once the plants reach maturity, they will be harvested, dried, and cured on-site in the existing storage shed or greenhouses. Trimming and further processing will occur at a third-party licensed facility. This ensures compliance with local and state processing standards.

## **2.5. EMPLOYEE PLAN**

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

### **2.5.1. JOB DESCRIPTIONS AND EMPLOYEE SUMMARY**

- *Agent in Charge*: Responsible for business oversight and management. Responsibilities include, but are not limited to: inventory and tracking, personnel management, record keeping, budget, and liaison with State and County inspectors as needed. This is a part-time to full-time, seasonal position.
- *Lead Cultivator*: Oversight and management of the day to day cultivation of commercial cannabis. Responsibilities include but are not limited to: plant propagation and transplant, soil management, irrigation, fertilization, pesticide management, and harvest activities. This is a full-time, year-round position.

### **2.5.2. STAFFING REQUIREMENTS**

Staffing will fluctuate based on the needs of the operation, with a peak of up to eight (8) employees during the busiest periods.

In addition to the *Agent in Charge, Lead Cultivator*, up to two (2) additional full-time workers and four (four) part-time seasonal labor positions. The number of seasonal laborers varies based on the needs of the farm during the cultivation and harvest. During peak operational periods, the operation may require up to eight (8) employees.

#### **2.5.3. EMPLOYEE TRAINING AND SAFETY**

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

#### **2.5.4. TOILET AND HANDWASHING FACILITIES**

A temporary portable toilet and handwashing station will be used on site for the seasonal laborers. Cultivation employees will have access to anti-bacterial Liquid Soap and paper hand towels. Work will occur at a distance no greater than 600 feet from the restroom facility.

#### **2.5.5. ON SITE HOUSING**

There is a residential structure on the project site. The residence is not proposed as part of cultivation operations and will not be associated with the proposed project.

#### **2.5.6. PARKING PLAN**

Parking is proposed to be located near the greenhouse and shop building. Four (4) parking spaces are located near the drying and curing area. (Appendix A).

### **2.6. SECURITY PLAN AND HOURS OF OPERATION**

#### **2.6.1. FACILITY SECURITY**

The cultivation facility is always secured by a locked gate. Access is restricted to authorized personnel only. All structures have lockable doors, and security measures include limited access to the cannabis processing and storage areas. Access to the area is limited to employees and approved personnel including agency staff, consultants, and distributors.

#### **2.6.2. HOURS OF OPERATION**

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

### 3. ENVIRONMENT

#### 3.1. WATER SOURCE, STORAGE, AND PROJECTED USE

Water is sourced from an on-site well, capable of producing 30 gallons per minute and will be supplemented by the recaptured water from the project’s dehumidifier water. Multiple well pump test have been performed and a Groundwater Well Evaluation report has been completed. The report concluded and provided an assessment to demonstrate that utilizing the existing well for the subject project will not impact surrounding wells. Recaptured water will provide approximately 15% (180 gal/day) to 25% (320 gal/day) of the estimated water needs during peak demands of 2,400 gallons per day, every other day. Projected water usage is 266,300 gallons annually. The irrigation method is a combination of drip irrigation with individualized hand-watering, which allows consistent monitoring and minimizes water waste.

Domestic water for the existing home is sourced from the permitted well.

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

The annual water demand is estimated to be approximately 266,300 gallons (6.92 gallons/sq. ft.). Table 1 outlines the estimated irrigation water usage for cultivation during a typical year. Variables such as weather conditions and specific cannabis strains will have a slight effect on water use.

*Table 1: Estimated Annual Irrigation Water Usage (gallons)*

Jan	Feb	Mar	April	May	June	July	Aug	Sept	Oct	Nov	Dec	Total
7,500	7,500	10,000	15,000	30,000	36,000	38,400	38,400	36,000	25,000	15,000	7,500	266,300

#### 3.1.1. DEHUMIDIFICATION AND RECAPTURE

Dehumidification is critical for this project to mitigate the risk of mold and mildew while creating an optimal greenhouse environment for plant growth. A total of 32 dehumidifiers will be installed throughout the greenhouse areas. Adjusted to Loleta's average conditions (65°F and 78% relative humidity), each dehumidifier can capture up to 15 gallons of water per day under ideal performance. Using a conservative efficiency estimate of 37%, each unit is projected to remove at least 5.6 gallons daily, totaling approximately 180 gallons per day across all dehumidifiers. At a higher efficiency of 66%, the dehumidifiers would recapture 10 gallons per unit per day, resulting in a total of approximately 320 gallons per day.

#### 3.1.2. SITE DRAINAGE, RUNOFF, AND EROSION CONTROL

The applicant has enrolled with the State Water Resources Control Board (SWRCB) for coverage under the General Order. A Site Management Plan (SMP) for existing site conditions has been developed.

#### 3.1.3. STORMWATER MANAGEMENT PLAN

The cultivation activities will take place in the existing structures in an agricultural field on slopes less than 5%. Stormwater management for the remainder of the property is addressed in the SMP, which will also include recommendations for road network maintenance. Existing and proposed structures are located over 50-ft from any watercourses, providing a sufficient buffer to prevent potential sediment or nutrient delivery.



### 3.1.4. EROSION CONTROL

The SMP will include erosion and sediment control best practicable treatment controls (BPTCs) designed to prevent, contain, and reduce sources of sediment. Additionally, the SMP will include site-specific corrective actions to ensure property maintenance and erosion control.

### 3.2. WATERSHED AND HABITAT PROTECTION

A Biological Assessment was not completed due to the lack of ground disturbance associated with the project. PLN-11065 Conditional Use Permit found that the same project was consistent where the General Plan (Eel River Area Plan), Open Space Plan and Open Space Action Program. Evidence which supports making the General Plan Conformance Finding and stated:

*"The project site exhibits upland characteristics as shown by the 2017 National Wetland Inventory (NWI) mapping. A review of the Eel River Area Plan Resources map and County GIS shows that an adjacent parcel to the west the project parcel contains seasonally flooded palustrine wetland. This is approximately 800 feet away from the project activities. There are no sensitive or critical habitats on the project parcel.*

*According to the California Natural Diversity Database (CNDDB) Resource Map maintained by the California Department of Fish and Wildlife (CDFW), there are two (2) listed special-status or threatened species in the vicinity of the subject parcel. Habitat for Northern Spotted Owl exists in the project vicinity (approximately 3.45 miles away) but as no generators (except as an emergency back-up) are proposed the noise impacts on NSO from the project will be well below the thresholds that could cause disturbance of the species."*

The project will require all light from the nursery or mixed light greenhouses shall be attenuated so that it does not create a new source of light or glare that could adversely impact local wildlife. Proposed activities would not increase ambient noise by greater than 3 decibels. Additionally, adherence to the Site Management Plan will ensure that erosion control and sediment capture BPTC measures are in place to prohibit water quality degradation of the nearby river.

### 3.3. INVASIVE VEGETATIVE SPECIES CONTROL PLAN

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

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

1. <https://calflora.org/>
2. <https://plants.usda.gov/java/>
3. <https://www.cal-ipc.org/>
4. <https://www.cal-ipc.org/solutions/>
5. <http://www.rareplants.cnps.org/>
6. <https://www.wildlife.ca.gov/Conservation/Plants#22064102-california-native-plant-information>
7. <http://ucjeps.berkeley.edu/>
8. [http://wetland-plants.usace.army.mil/nwpl\\_static/v33/home/home.html](http://wetland-plants.usace.army.mil/nwpl_static/v33/home/home.html)
9. <https://www.fws.gov/invasives/partnerships.html>

### **3.4. MATERIALS MANAGEMENT PLAN**

Cultivation, harvesting, and drying shall be performed by employees trained on each aspect of the procedure, including cultivation and harvesting techniques, the use of pruning tools, and proper application/storage of pesticides/ and fertilizers. All cultivation and processing staff are provided with proper hand, eye, body and respiratory Personal Protective Equipment (PPE). Access to the onsite cultivation, drying and processing facilities are limited to authorized and trained staff. The mixing of fertilizers in small storage tanks is solely conducted in a designated area (to be determined) where the mix will not enter surface waters. For young plants, the mix is applied via watering wand and mature plants are fertigated at agronomic rates by drip emitters or hand watering methods. Spent soil is amended and reused as needed. The application of any agricultural chemical products will be conducted according to the manufacturer's recommendation.

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

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

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

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

### **3.5. SOILS MANAGEMENT PLAN**

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

### **3.6. HAZARDOUS WASTE STATEMENT**

There are no hazardous materials mapped onsite. The site has been historically utilized for residential property and agricultural uses. A search of the EnviroSTOR database shows no GeoTracker Cleanup Programs on-site.

### **3.7. ENERGY PLAN**

The cultivation facility is powered by Pacific Gas & Electric (PG&E), and a backup generator is available for emergency use. All generators used will comply with noise and air quality standards.

### **3.8. WASTE MANAGEMENT**

#### **3.8.1. CULTIVATION**

Organic cultivation-related waste, including root balls, branches, and leaves will be hauled off site to a green waste management facility as needed. Trash and recycling from cannabis operations, including empty soil or fertilizer bags, liquid fertilizer bottles, cultivation supplies, etc., will be taken to the nearest waste management facility as needed.

#### **3.8.2. SEWAGE DISPOSAL PLAN**

An existing septic system serves the residence and the processing building. The existing residence not proposed to be use as part of the commercial cannabis activities. Cultivation employees will have access to anti-bacterial Liquid Soap and paper hand towels. Work will occur at a distance no greater than 1,200 feet from the restroom facility.

## **4. PRODUCT MANAGEMENT**

### **4.1. PRODUCT TESTING AND LABELING**

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

### **4.2. PRODUCT INVENTORY AND TRACKING**

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

### **4.3. TRANSPORTATION AND DISTRIBUTION**

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

OPERATIONS MANUAL

2121, LLC

**APPENDIX B: CULTIVATION ACTIVITIES SCHEDULE**

Item	Description	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Drainage, Runoff, and Erosion Control	Winterization (storage of pots/greenhouse covers)												
	Temporary Erosion Control BMP's (straw, seeding, fiber rolls, etc)												
	Road maintenance												
	Culvert and inboard ditch maintenance/inspection		X										
	Cultivation waste hauled off site												
	Cover soil beds and seed/straw with cover crop												
Irrigation Activities	Irrigation of juvenile plants /clones												
	Irrigation of flowering plants												
Pre-cultivation Activities	Transplant cuttings into pots												
	Transplant clones into beds												
	Amend soil in greenhouses												
Outdoor Cultivation and Harvest Schedule	Import new cultivation soil												
	Outdoor Cultivation Cycle												
Drying and Processing	Harvest activities												
	Drying activities												
Staffing Presence	Trimming activities (Will take place offsite)												
	Agent in Charge												
	Lead Cultivator												
	Seasonal Laborors												

## APPENDIX C: REFERENCES

- Bass, Ronald E., Kenneth M. Bogdan, and Terry Rivasplata. 2013. CEQA Desktop. Point Arena, CA; Solano Book Press. Page 44.
- California Code of Regulations. Health and Safety Code Section 11357-11362.9. <<http://www.leginfo.ca.gov/cgi-bin/displaycode?section=hsc&group=11001-12000&file=11357-11362.9>> Date accessed: July 16, 2014.
- California NORML. SB 420 Establishes Prop. 215 Guidelines, Voluntary Patient Identification Card System. <<http://www.canorml.org/laws/sb420.html>> Date accessed: July 21, 2014.
- County of Humboldt. *Medical Marijuana Land Use Ordinance (MMLUO) – Phase IV, Commercial Cultivation, Processing, Manufacturing and Distribution of Cannabis for Medical Use* (Staff Report to the Board of Supervisors). January 26, 2016. <<https://humboldt.legistar.com/Calendar.aspx>> Date accessed: March 28, 2016.
- North Coast Regional Water Quality Control Board. 2016. *Cannabis Cultivation Waste Discharge Regulatory Program*. [http://www.waterboards.ca.gov/northcoast/water\\_issues/programs/cannabis/](http://www.waterboards.ca.gov/northcoast/water_issues/programs/cannabis/). Date accessed: March 28, 2016.
- State Board of Equalization. Information on the Sales and Registration for Marijuana Sellers. June 2007. <<http://www.boe.ca.gov/news/pdf/173.pdf>>
- State of California. Guidelines for the Security and Non-Diversion of Marijuana Grown for Medical Use. August 2008. <[http://www.ag.ca.gov/cms\\_attachments/press/pdfs/n1601\\_medicalmarijuanaguidelines.pdf](http://www.ag.ca.gov/cms_attachments/press/pdfs/n1601_medicalmarijuanaguidelines.pdf)>

# 2121, LLC EXISTING SITE PLAN

APN: 308-131-012 & 308-131-020



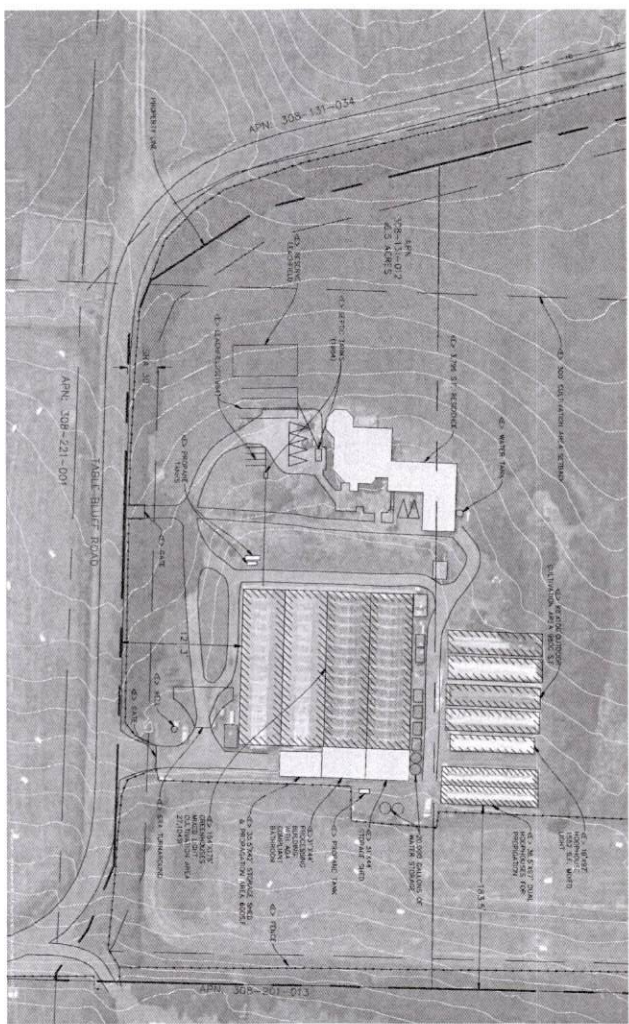
**PROJECT DESCRIPTION:**

2121, LLC SEeks approval for a conditional use permit (CUP) and coastal development permit for a new 28,656 square feet of existing mixed-light cultivation within an existing greenhouse and an additional 9,800 square feet of outdoor cultivation with existing hoop houses. The project is a continuation of the cannabis cultivation operation (P/N-11095-CUP) for the conversion of a commercial cannabis cultivation operation.

**2121 LLC'S PROPOSAL DOES NOT INCLUDE AN INCREASE IN CULTIVATION SIZE, WATER USE, ELECTRICAL USE, OR NUMBERS OF REQUIRED EMPLOYEES. THE PROJECT IS IDENTICAL TO THE PROJECT APPROVED UNDER A PREVIOUSLY APPROVED P/N-11095-CUP.**

**NOTES:**

NO ONSITE STREAM CROSSINGS



**LEGEND**

- EXISTING PARCEL BOUNDARY LINE
- LEGAL ASSESSOR PARCEL BOUNDARY LINE
- SPA SE BRACK LINE
- OVERHEAD POLE LINE
- EXISTING FENCE LINE
- PARKING SPACES

**EXISTING SITE PLAN**

22924 SHEET 1"-400'  
11917 SHEET 1"-800'  
0 200 400 800  
N

2121, LLC 2121 TABLE BLUFF ROAD LOLETA CA 95551 EXISTING SITE PLAN	<b>NORTHPOINT</b> CONSULTING GROUP, INC. 1117 Samoa Blvd., Arcata, CA 95521	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 5%;">DATE</th> <th style="width: 15%;">REVISION</th> <th style="width: 80%;">DESCRIPTION</th> </tr> <tr> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> </tr> </table>	DATE	REVISION	DESCRIPTION												
DATE	REVISION	DESCRIPTION															
	SHEET 2 OF 2 2121, LLC	PREPARED BY: CARLA G... CHECKED BY: CARLA G... DATE: 12/10/24 SCALE: AS SHOWN															



# 2121, LLC

## CONDITIONAL USE PERMIT AND COASTAL DEVELOPMENT PERMIT

APN: 308-131-020 & 308-131-012



**DIRECTIONS TO SITE:**  
 FROM UMBRIA, CA  
 US 1015  
 (APPROX 6.6M)  
 EXIT 696 FOR HOCKTON RD  
 (APPROX 1.3MILES)  
 TURN RIGHT ON TABLE BLUFF RD  
 (APPROX 0.5MILES)  
 TURN LEFT TO STAY ON TABLE BLUFF RD  
 (APPROX 0.5MILES)  
 DESTINATION ON THE RIGHT

**PROJECT DESCRIPTION:**

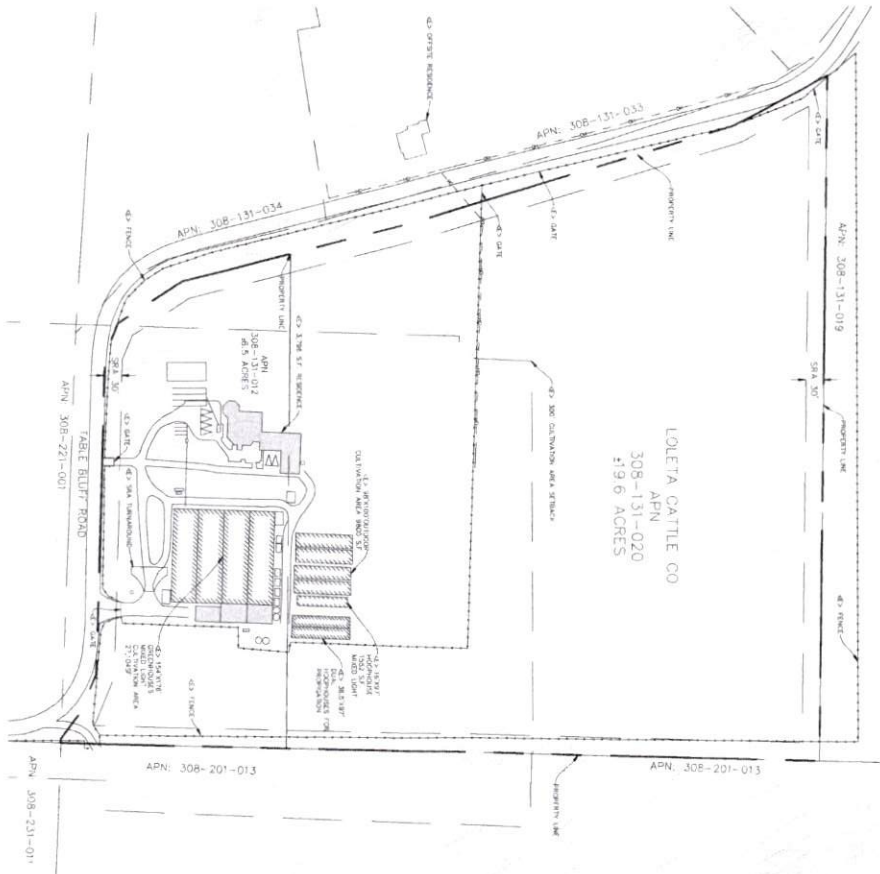
2121, LLC SEEKS APPROVAL FOR A CONDITIONAL USE PERMIT (CUP) AND COASTAL DEVELOPMENT PERMIT FOR A NEW OWNER AND OPERATOR. THE PROPOSED PROJECT WILL BE 28,656 SQUARE FEET OF EXISTING WHEAT FLOOD CULTIVATION AND 19,968 SQUARE FEET OF NEW WHEAT FLOOD CULTIVATION. THE PROPOSED PROJECT WILL BE 19,968 SQUARE FEET OF OUTDOOR CULTIVATION WITH EXISTING HOOP HOUSES. THE PARCEL HAD AN EXISTING APPROVED CANNABIS CULTIVATION OPERATION (PLAN-1005-CUP) FOR THE OPERATION OF A COMMERCIAL CANNABIS CULTIVATION OPERATION.

2121, LLC PROPOSAL DOES NOT INCLUDE AN INCREASE IN THE NUMBER OF REQUIRED EMPLOYEES. THE PROJECT IS PROPOSED TO OPERATE IN THE EXISTING FOOTPRINT OF THE PREVIOUSLY APPROVED PLAN-1005-CUP.

**GENERAL NOTES:**

- DRAWING SCALE AS NOTED. WRITTEN DIMENSIONS SHALL TAKE PRECEDENCE OVER SCALED DIMENSIONS.
- THIS IS NOT A BOUNDARY SURVEY. BOUNDARY INFORMATION DERIVED HAS BEEN OBTAINED FROM HUMBOLDT COUNTY RECORDS. THIS INFORMATION IS NOT A GUARANTEE AND SHOULD NOT BE USED TO VERIFY THIS PROPERTY BOUNDARY.
- THERE ARE NO NEARBY SCHOOLS, SCHOOLS, BUS STOPS, OR OTHER PUBLIC FACILITIES WITHIN THE PROJECT AREA.
- THERE ARE NO RESIDENCES ON ADJACENT PARCELS WITHIN 300 FEET OF THE PROPOSED CULTIVATION AREAS.
- ANY EXISTING DEVELOPMENT CONSIDERED WITHOUT THE BENEFIT OF COUNTY REVIEW WILL BE SUBJECT TO THE BOUNDARY SURVEY BUREAU REQUIREMENT UPON APPROVAL OF THE CONDITIONAL USE PERMIT.

**LEGEND**



**PLOT PLAN**



**PROJECT INFORMATION:**

APPLICANT: 2121, LLC  
 2121, LLC  
 1117 SAMOA BLVD  
 ARCATA, CA 95521  
 (707) 798-6437

PROPERTY OWNER: P.O. BOX 1020  
 GAMBRIELE, CA 95542

APPLICANTS AGENT: NORTON CONSULTING GROUP, INC.  
 1117 SAMOA BLVD  
 ARCATA, CA 95521  
 (707) 798-6437

SITE ADDRESS: APN 308-131-012, 308-131-020  
 2121 TABLE BLUFF RD  
 LOLETA, CA 95551

THRES TO BE REMOVED = NONE

PRIME AGRICULTURAL AREA = 281 ACRES  
 20% OF PRIME AGRICULTURAL AREA = 56 ACRES  
 EXISTING OUTDOOR CULTIVATION AREA = 9,800 SQ FT  
 EXISTING WHEAT LIGHT CULTIVATION AREA = 28,656 SQ FT  
 NO EXPANSION OF EXISTING CULTIVATION IS PROPOSED

FERTILIZER QUANTITIES = 0 CY/TILL  
 WATER = PRIVATE  
 SLURRY = PRIVATE

PROPERTY SIZE: APN 308-131-012 = 44.5 ACRES  
 APN 308-131-020 = 19.6 ACRES

ZONING: - AE-160/A.W.T  
 GENERAL PLAN DESIGNATION: - AE0160

**BUILDING SCHEDULES:**

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

SPA AREA = YES  
 IN COASTAL ZONE = YES (LOCAL JURISDICTION)  
 IN 100 YR FLOOD ZONE = NO

**SHEET INDEX:**

- C0 - PLOT PLAN, VICINITY MAP, & PROJECT NOTES
- C1 - EXISTING SITE PLAN

<p>2121, LLC</p> <p>2121 TABLE BLUFF ROAD LOLETA CA 95551</p> <p>CONDITIONAL USE PERMIT AND CDP</p>	<p><b>NORTHPOINT</b></p> <p>CONSULTING GROUP, INC.</p> <p>1117 Samoa Blvd., Arcata, CA 95521</p>	<p>2121, LLC</p> <p>Project No. 2121</p> <p>Sheet No. C0</p> <p>DATE: 03/20/25</p> <p>SCALE: AS SHOWN</p>
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