



COUNTY OF HUMBOLDT
PLANNING AND BUILDING DEPARTMENT
CANNABIS SERVICES DIVISION

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

October 22, 2018

Circle G Farms LLC
Seth Graves
PO Box 1129
Trinidad, CA 95570

RE: Permit Application No. 12952

APN: 532-054-001 et al.

Case No.: CUP16-932

Dear Seth Graves:

Thank you for your continued efforts to obtain approval of a commercial cannabis permit for 2.5 acres of new mixed light and 2.5 acres of new outdoor cannabis cultivation. Prior correspondence regarding the project has included an incomplete letter dated 2/9/17, and a pending withdrawal notice dated 8/16/17. Our records indicate that the agent for this project is Manhard Consulting – please provide the department with updated contact information if you have assigned a new agent. Additional application materials have been received, including on 9/13/17. Unfortunately, after review the application submittal was found not to contain all of the required information and we are unable to move the permit forward at this time.

Listed below are the actions you must take for staff to continue processing this permit application:

1. Submit an Initial Study prepared by a qualified professional pursuant to the California Environmental Quality Act (CEQA) that analyzes all proposed development on the parcel(s).
2. Submit a revised prime agricultural soils report or reduce the amount of cultivation being applied for. The Commercial Medical Marijuana Land Use Ordinance (CMMLUO) section 55.4.8.2.1 requires “The cultivation area shall be located on the Prime Agricultural Soils on the parcel and no more than 20% of the area of Prime Agricultural soils on the parcel may be permitted for commercial medical marijuana cultivation.” The soils report on file estimates that “the site has an area of Prime Agricultural Soils which encompasses approximately 19 acres of the total 216.91 GIS acres of parcel 532-054-001.” Twenty (20) percent of that quantity would be 3.8 acres, which would therefore be the maximum quantity of new cultivation area available on the parcel. In order to support the full five (5) acres of cultivation being applied for, submit additional evidence of the quantity and location of prime agricultural soils on the parcel. Alternatively, you may reduce the amount of cultivation being applied for.
3. Submit documentation that the proposed cultivation area would be located on slopes of 15% or less. US Geological Survey data currently suggests the proposed area would have slopes in excess of 15%.
4. Submit an addendum to the Operations Plan that includes the following additions:
 - o Measures to comply with International Dark Sky Association Standards;
 - o Clarification on the water storage plan - Be advised, if your source of water for cultivation and associated activities is a well, forbearance will be required pursuant to Humboldt County Code Section 314-55.4.11(l) unless it can be demonstrated that the well is not hydrologically connected to surface water. As a condition of project approval you will be required to provide confirmation from CDFW that the well is not hydrologically connected to surface water, or ensure water storage capacity to comply with a mandatory forbearance period.
5. Submit an updated Site Plan that includes the following additions/edits:
 - o Easements (if applicable – if not, include a note on the map as such);
 - o Graded flats (if applicable – if not, include a note on the map as such);
 - o Cultivation setback distances from natural waterways including streams, springs, ponds, culverts, and any other water features;

- o Proposed internal access roads;
 - o Proposed well;
 - o Proposed septic/sewer system;
 - o Date of construction for other buildings and water storage structures.
6. Submit a route map showing which roads are used to access the operations area from the nearest major publicly maintained road.
 7. Submit a completed Road Evaluation Report (enclosed). If selecting "Box 2", include evidence, such as photos or other documentation, justifying that determination.

Pursuant to Humboldt County Code (HCC) Section 312-11.2, "Development permits shall be issued only for a lot that was created in compliance with all applicable state and local subdivision regulations." While our office is in the process of completing this review for your parcel, it may be necessary for you to submit additional information in order to determine how the property was created in its current configuration. If additional information is needed our office will contact you.

County staff will conduct a review of previous land use actions that have been approved on the subject parcel(s) to ensure that, "The proposed development complies with the terms and conditions of any applicable permit and/or subdivision map that was previously approved for such development" (HCC §312-2.4.1.2). If a relevant project is found and additional information is needed, our office will contact you.

Please keep in mind, additional information may be requested once the project is reviewed by State and local agencies during the referral stage of the process. The Department cannot make the required findings specified in Humboldt County Code Sections 312-1.1.2 and 312-17 et seq., and the California Environmental Quality Act (CEQA) based on the information submitted to date. In order for the Department to further evaluate this project for compliance, the additional requested information must be submitted.

Unless it is withdrawn, the Department must act on your application. For this reason, if you do not submit the requested materials or a request for hearing within 180 days (6 months) of the date of this letter, we will begin scheduling your project for a hearing. This could result in the denial of your application and the inability to secure a State license under the Medical and Adult Use Cannabis Regulation and Safety Act (MAUCRSA).

Please accumulate all requested material and submit as a complete package to the contact listed below during regular business hours. When submitting these items please include the Application Number and APN found at the top of this letter. For most efficient processing, please include a copy of this letter with your submittals.

Please remember that the filing of a permit application does not authorize the applicant to engage in any new commercial marijuana cultivation, processing, manufacture or distribution activity. No such activity shall commence until the application has been processed to decision and all requisite clearances, permits and/or licenses have been secured. If you have questions about this letter, please contact Isaac Hansen at 707-441-2623.

Sincerely,



Isaac Hansen
Cannabis Services Division
vendorlaco@co.humboldt.ca.us

Attachments
Road Evaluation Report