

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

**Resolution Number: 25-011**

**Record Number: PLN-12573-CUP**

**Assessor's Parcel Number: 216-136-006**

**Resolution by the Planning Commission of the County of Humboldt certifying compliance with the California Environmental Quality Act and conditionally approving the Old Harris Farms, LLC Conditional Use Permit.**

**WHEREAS**, Old Harris Farms LLC provided an application and evidence in support of approving a Conditional Use Permit for an existing 19,695 square foot outdoor commercial cannabis cultivation operation and a Special Permit for remediation efforts proposed to be conducted within the Streamside Management Area; and

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

**WHEREAS**, the Humboldt County Planning Commission held a duly-noticed public hearing on February 20, 2025 and reviewed, considered, and discussed the application for a Conditional Use Permit and reviewed and considered all evidence and testimony presented at the hearing.

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

**1. FINDING:**

**Project Description:** A Conditional Use Permit for 19,695 square feet of existing outdoor cannabis cultivation operation with 1,968 square feet of appurtenant nursery space. Irrigation water will be provided by a permitted well and a rainwater catchment pond. Cultivation water is stored in an existing pond (511,000 gallons), and hard tanks (23,750 gallons) for a total of 534,750 gallons. Annual cultivation water use is 186,000 gallons. Drying and curing will occur on-site, all other processing will occur off-site at a licensed processing facility. Electricity is provided by a gas generator, but the project will convert to renewable energy by January 1, 2026, reserving generators for emergency use only. The project includes a Special Permit for actions in a streamside management area.

**EVIDENCE:** a) Project File: PLN-12573-CUP

**2. FINDING:** **CEQA.** The project complies with the requirements of the California Environmental Quality Act. The Humboldt County Planning Commission has considered the Mitigated Negative Declaration previously adopted for the Commercial Medical Marijuana Land Use Ordinance as well as the Addendum to the Mitigated Negative Declaration that was prepared for the project pursuant to Section 15164 of the CEQA guidelines.

**EVIDENCE:**

- a) Addendum prepared for the proposed project.
- b) The proposed project does not present substantial changes that would require major revisions to the previous MND. No new information of substantial importance that was not known and could not be known at the time was presented as described by §15162(c) of CEQA Guidelines.
- c) The project is conditioned to demonstrate compliance with the State Water Board Cannabis General Order for Waste Discharge. Conditions of approval require the applicant to adhere to and implement the recommendations of the SMP and maintain enrollment in the State Cannabis Cultivation Policy for the life of the project.
- d) The project is for pre-existing cultivation. The nearest mapped Northern Spotted Owl activity center is 2.8 miles to the southeast (HUM0223). The project utilizes pre-existing open areas, and cultivation does not use artificial light except for the ancillary nursery. Use of the generator is subject to the standard condition limiting noise to 50dB at 100 feet from the backup generator or at the edge of the nearest forest habitat, whichever is closer. As proposed and conditioned, the project is consistent with CMMLUO performance standards and CDFW guidance and will not negatively affect the northern spotted owl or other sensitive species.
- e) Staff review of the CNDDDB concluded that continuing the operation will not impact species of concern.
- f) A Road Evaluation Report concludes the route leading to the subject parcel is developed to the equivalent of a category 4 road standard, is in good condition, and does not have any evidence of a site-specific safety problem.



- g) The continued cultivation of commercial cannabis will not result in a net timber conversion.
- h) Consultation with the Bear River Band of the Rohnerville Rancheria resulted in the standard inadvertent discovery protocol as a condition of approval.

### **FINDINGS FOR CONDITIONAL USE PERMIT**

**3. FINDING:** The proposed development is in conformance with the County General Plan, Open Space Plan, and the Open Space Action Program.

**EVIDENCE:** a) General agriculture is a use type permitted in the Agricultural Grazing (AG) land use designation. The proposed cannabis cultivation, an agricultural product, is within land planned and zoned for agricultural purposes, consistent with the use of Open Space land for managed production of resources. The use of an agricultural parcel for commercial agriculture is consistent with the Open Space Plan and Open Space Action Program. Therefore, the project is consistent with and complimentary to the Open Space Plan and its Open Space Action Program.

**4. FINDING:** The proposed development is consistent with the purposes of the existing Agriculture Exclusive (AE-B-5(160)) zone in which the site is located.

**EVIDENCE:** a) The Agriculture Exclusive or AE Zone is intended to be applied in fertile areas in which agriculture is and should be the desirable predominant use and in which the protection of this use from encroachment from incompatible uses is essential to general welfare.

b) All general agricultural uses, including accessory agricultural uses and structures listed are permitted in the AE zone.

c) Humboldt County Code section 314-55.4.8.2.2 allows cultivation of up to 43,560 square feet of existing outdoor cannabis cultivation and up to 22,000 square feet of existing mixed-light commercial cannabis on a parcel over 1 acre subject to approval of a Conditional Use Permit and a determination that the cultivation was in existence prior to January 1, 2016. The application for 19,695 square feet of existing cultivation on a 275-acre parcel is consistent with this and

with the cultivation area verification prepared conducted by staff.

- d) 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.

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

- EVIDENCE:**
- a) The CMMLUO allows existing cannabis cultivation to be permitted in areas zoned FR (HCC 314-55.4.8.2.2).
  - b) The parcel was created in compliance with all applicable state and local subdivision regulations. The 275-acre parcel's legality is established by the recorded Notice of Merger and Subdivision Compliance, document number 2017-020415.
  - c) The project will obtain water from rainwater catchment, an eligible water source and a permitted well. A provided rainwater catchment analysis demonstrates adequate water can be collected in low rainfall years.
  - d) A Road Evaluation Report found the access roads to be functionally appropriate for the expected traffic.
  - e) The slope of the land where existing cannabis will be cultivated is 0% to 15% and 15% to 30 % on existing flats. No new grading will occur.
  - f) The continued cultivation of cannabis will not result in the net conversion of timberland.
  - g) The location of the cultivation complies with all setbacks required in Section 314-55.4.11.d. It is more than 30 feet from any property line and more than 600 feet from any school, church, public park, or Tribal Cultural Resource.

**6. FINDING:** The continued cultivation of 19,695 square feet of existing cannabis cultivation and the conditions under which it may be operated or maintained will not be detrimental to the public health, safety, or welfare or materially injurious to properties or improvements in the vicinity.



- EVIDENCE:**
- a) The site is located on road that has been found to safely accommodate the amount of traffic generated by the proposed cannabis cultivation.
  - b) The site is in a rural part of the County where the typical parcel size is over 80 acres and many of the land holdings are very large. The proposed cannabis will not be in a location where there is an established neighborhood or other sensitive receptor such as a school, church, park, or other use which may be sensitive to cannabis cultivation. Approving cultivation on this site and the other sites which have been approved or are in the application process will not change the character of the area due to the large parcel sizes in the area.
  - c) Irrigation water will come from rainwater catchment, and a permitted well, eligible water sources.
  - d) Provisions have been made in the applicant's proposal and conditions added to the project to protect water quality and thus runoff to adjacent property and infiltration of water to groundwater resources will not be affected.

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

- EVIDENCE:**
- a) The parcel was not included in the housing inventory of Humboldt County's 2019 Housing Element but does have the potential to support one housing unit. The approval of cannabis cultivation on this parcel will not conflict with the ability for a residence to be permitted on this parcel.

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

- EVIDENCE:**
- a) The project site is in the Middle Main Eel Planning Watershed, which under Resolution 18-43 is limited to 360 permits and 125 acres of cultivation. With the approval of the project the total approved permits in this Planning Watershed would be 111 permits and the total approved acres would be approximately 46.5 acres of

cultivation.

**9. FINDING:** The use of the well for irrigation purposes will not have any adverse impacts on any public trust resources.

**EVIDENCE:** a) The project is in the Middle Main Eel River Watershed; the project is 2.93 miles southwest of the Eel River. Perington Creek, a perennial watercourse, flows through the southern portion of the parcel and joins Jewett Creek on the eastern boundary of the parcel. Jewett Creek flows into the Eel River. The project includes the restoration of a class III ephemeral watercourse that originates at the pond and continues northeast to Frenchman Creek which is also a tributary to the Jewett Creek. The well provides 48,000-gallons to the project's water budget. Staff determined that the well was unlikely to have a connection to surface water resources. The rainwater collection pond provides the balance of the water budget. The Eel River provides recreational opportunities for swimming, boating, and fishing. The project collects water in the rainy season from November 1<sup>st</sup> to April 31<sup>st</sup> when the river has excess water due to rainfall. Water from the tanks and pond are used in the dry season when the public trust resource of the river is limited. The project has no impact on flows during the dry season, thus the use of the stored water and the hydrologically disconnected well for irrigation purposes will not cause any significant adverse impact to the Eel River or otherwise substantially impair the public trust uses or values related to commerce, navigation, fisheries, public access, preservation of trust lands in their natural state, or water-related-recreation and other activities.



## DECISION

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

- Adopt the findings set forth in this resolution; and
- Conditionally approves the Conditional Use Permit and Special Permit for Old Harris Farms LLC, subject to the conditions of approval attached hereto as Attachment 1.

Adopted after review and consideration of all the evidence on **February 20, 2025**.

The motion was made by COMMISSIONER THOMAS MULDER and second by COMMISSIONER NOAH LEVY and the following vote:

AYES: COMMISSIONERS: Iver Skavdal, Thomas Mulder, Noah Levy, Jerome Qiriazzi, Sarah West, Lorna McFarlane

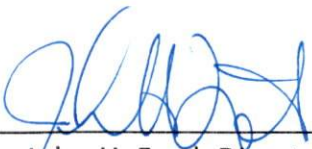
NOES: COMMISSIONERS:

ABSENT: COMMISSIONERS: Peggy O'Neill

ABSTAIN: COMMISSIONERS:

DECISION: Motion carried 6/0

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

  
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John H. Ford, Director  
Planning and Building Department

## CONDITIONS OF APPROVAL

**APPROVAL OF THE CONDITIONAL USE PERMIT IS CONDITIONED ON THE FOLLOWING TERMS AND REQUIREMENTS.**

**A. Conditions subject to the compliance agreement must be satisfied before the provisional cannabis cultivation permit is no longer considered provisional. This section also includes conditions that must be completed within specified time frames or completed prior to commencing cultivation.**

1. Within 60 days of the effective date of permit approval, the permittee shall execute a Compliance Agreement with the Humboldt County Planning and Building Department described under Conditions of Approval A8 through A11. All activities described in the agreement must be completed to the satisfaction of the Planning and Building Department before the permit may be finalized and no longer considered provisional.
2. Within 60 days of the effective date of permit approval, the Permittee shall install water meters at the well head and the outlet of the rainwater collection pond, and/or the rainwater collection tanks. The permittee shall keep monthly records of water usage. The water meter records shall be made available to the Planning Department at each annual inspection or as requested by planning staff.
3. Prior to April 22, 2025, the permittee shall provide documentation demonstrating that requested modifications to LSAA, 1600-2019-0332 have been submitted to California Department of Fish and Wildlife. Requested Modifications include extending and amending the LSAA to update the work completion date to October 15, 2025, submitting a Revegetation Plan for the Western Cultivation Site (located at coordinates 40.106236, -123.640953) for review and approval, and submitting a Bullfrog Management Plan to CDFW.
4. Within 30 days of project approval the permittee shall provide documentation demonstrating that they have initiated consultation with the State Water Resources Control Division of Water Rights to determine the need for a water right for use of the pond's water.
5. If consultation with State Water Resources Control Board's (SWRCB) Division of Water Rights determines that a water right is required for use of the pond, the permittee shall secure said water right within two years of project approval. If the permittee is unable to secure said water right, the permittee has an additional year to develop



water storage or rainwater catchment facilities sufficient to provide 140,000 gallons of water per year or cultivation area must be reduced proportionally to the water deficit. Alternatively, the permittee may provide a hydrological evaluation of the well, prepared by a licensed geologist, that documents the well's capability to provide at least 186,000 gallons of water annually without impacts to surface water or public trust resources.

6. Within 60 days of the effective date of project approval, the permittee 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 and Building Department.
7. Within 60 days of the effective date of project approval, the permittee shall obtain a will-serve letter from the Fire Protection District OR cause to be recorded an "ACKNOWLEDGMENT OF NO AVAILABLE EMERGENCY RESPONSE AND FIRE SUPPRESSION SERVICES" for the parcel(s) on a form provided by the Humboldt County Planning Division. Document review fees as set forth in the schedule of fees and charges as adopted by ordinance of the Humboldt County Board of Supervisors will be required.
8. The permittee shall provide documentation that a Revegetation Plan for the Western Cultivation Site (located at coordinates 40.106236, -123.640953) has been fully implemented.
9. The permittee shall implement the Site Management Plan (1B170774CHUM) to deconcentrate surface flow off roads and away from streams. This would include installation and/or maintenance of water bars as necessary to mitigate sediment delivery to streams.
10. The Permittee shall secure building permits for all structures and grading associated with the cannabis cultivation project. Permits or exemptions will be required for three sheds, a pond, and any significant grading that occurred to facilitate the cultivation operation.
11. The permittee shall ensure that if the County Road has a gravel surface at the location of the access road, the access road shall be rocked for a minimum width of 20 feet and a minimum length of 50 feet where it intersects the County Road.
12. No later than January 1, 2026, the permittee will develop and fully implement an alternative renewable energy (i.e., solar, wind, micro-hydro) plan for electricity

serving the cannabis operation such that generator use may be reserved for emergency use only.

13. The permittee shall be compliant with the County of Humboldt's Certified Unified Program Agency (CUPA) requirements regarding hazardous materials. 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 to keep the permit valid.
14. Prior to any additional vegetation removal, grading or ground disturbing activities, protocol level surveys shall be conducted by a qualified botanist specifically surveying for *Tracyina rostrata*, a threatened plant that has been documented within 3 miles of the project.
15. Prior to cultivating cannabis in 2025, cages, pots and debris related to cannabis cultivation located in a stream channel (at coordinates 40.10608, -123.64094) shall be removed from the stream channel.
16. Prior to cultivating cannabis in 2025, cultivation related materials located in the Streamside Management Area (SMA) of a Class III drainage (at coordinates 40.10669, -123.63914) shall be removed from the SMA.

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

1. 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 and the appropriate Tribal Historic Preservation Officer(s) are to be contacted to evaluate the discovery and, in consultation with the permittee and the lead agency, develop a treatment plan in any instance where significant impacts cannot be avoided. Prehistoric materials may include obsidian or chert flakes, tools, locally darkened midden soils, ground-stone 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 at 707-445-7242. If the Coroner determines the remains to be Native American, the Native American Heritage Commission will then be contacted by the Coroner to determine appropriate treatment of the remains pursuant to Public Resources Code (PRC) Section 5097.98. Violators shall be prosecuted in accordance with PRC Section 5097.99



2. If the applicant is unable to store 186,000 gallons of water due to low rainfall years, the applicant will be required reduce the area cultivated in proportion to the deficit in stored water, at a rate of one square foot of cultivation area for each nine gallons deficit of cultivation water.
3. Permittee must demonstrate that a properly functioning onsite wastewater treatment system serves the operation. This can be accomplished by either installing a new, permitted septic system; or alternatively, permittee shall provide DEH with an assessment of the existing system performed by a qualified professional engineer, geologist, soil scientist, or REHS that certifies that the existing system complies with the State RWQCB definition of a Tier 0 system - not impairing groundwater or surface water resources. Until such time that this condition is satisfied, the permittee must use a portable toilet to support the cultivation operation.
4. The permittee shall adhere to the ongoing monitoring and maintenance protocols listed in the table of the Water Resources Protection Plan as amended.
5. The permittee shall comply with the requirements of the **LSAA, 1600-2019-0332**, as amended, regarding the use and maintenance of the point of diversion.
6. After December 31, 2025, generators shall be used for emergency purposes only.
7. The combination of background, generator and greenhouse fan or other operational equipment created noise must not result in the harassment of Northern Spotted Owl species as required to meet the performance standards for noise set by Department Policy Statement No. 16-005 clarifying CMMLUO Section 55.4.11 (o) requirements. The combined noise levels measured at 100 feet or the edge of habitat, whichever is closer, shall be at or below 50 decibels. Conformance will be evaluated using current auditory disturbance guidance prepared by the United State Fish and Wildlife Service, and further consultation where necessary. A building permit shall be obtained should any structures be necessary for noise attenuation.
8. All artificial lighting shall be fully contained within propagation structures such that no light escapes (e.g., through blackout tarps). Structures shall be enclosed between 30 minutes prior to sunset and 30 minutes after sunrise to prevent disruption to crepuscular wildlife. Security lighting shall be motion activated and comply with the International Dark-Sky Association standards and Fixture Seal of Approval Program; see: <https://www.darksky.org/our-work/lighting/lighting-for-citizens/lighting-basics/> Standards include but are not limited to the following, 1) light shall be shielded and

downward facing, 2) shall consist of Low-Pressure Sodium (LPS) light or low spectrum Light Emitting Diodes (LED) with a color temperature of 3,000 kelvins or less and 3) only placed where needed.

9. Should the Humboldt County Planning Division receive complaints that the lighting or noise is not complying with the standards listed above in items B.7 and B.8, within ten (10) working days of receiving written notification that a complaint has been filed, the permittee shall submit written verification that the lights' shielding and alignment, and noise levels have been repaired, inspected, and corrected as necessary.
10. 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.
11. All refuse shall be contained in wildlife proof storage containers, always, and disposed of at an authorized waste management facility. This includes plastic irrigation lines when not in use during the growing season.
12. Should any wildlife be encountered during work activities, the wildlife shall not be disturbed and be allowed to leave the work site unharmed.
13. The use of anticoagulant rodenticide is prohibited.
14. All components of the project shall be developed, operated, and maintained in conformance with the Project Description, the approved Site Plan, the Cultivation & Operations Plan, 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.
15. Cannabis cultivation and other commercial cannabis activity shall be conducted in compliance with all laws and regulations as set forth in the CMMLUO and MAUCRSA, as applicable to the permit type.
16. If operating pursuant to a written approved compliance agreement, permittee shall abate or cure violations at the earliest feasible date, but in no event no more than two (2) years from the date of issuance of a provisional clearance or permit. Permittee shall provide plans for curing such violations to the Planning and Building Department within one (1) year of issuance of the provisional clearance or permit. If good faith



effort toward compliance can be shown within the two years following the issuance of the provisional clearance or permit, the Department may, at the discretion of the Director, provide for extensions of the provisional permit to allow additional time to meet the outstanding requirements.

17. Possession of a current, valid required license, or licenses, issued by any agency of the State of California in accordance with the MAUCRSA, and regulations promulgated thereunder, as soon as such licenses become available.
18. Compliance with all statutes, regulations, and requirements of the California State Water Resources Control Board and the Division of Water Rights, at a minimum to include a statement of diversion of surface water from a stream, river, underground stream, or other watercourse required by Water Code Section 5101, or other applicable permit, license, or registration, as applicable.
19. 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).
20. Maintain enrollment in Tier 1, or 2 certification with State Water Resource Control Board (SWRCB) Order No. WQ 2019-0001-DWQ, if applicable, or any substantially equivalent rule that may be subsequently adopted by the County of Humboldt or other responsible agency.
21. Comply with the terms of a less-than-3-acre conversion exemption or timberland conversion permit, approved by the California Department of Forestry and Fire Protection (Cal Fire), if applicable.
22. 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 through Friday, 9:00 a.m. to 5:00 p.m., excluding holidays).
23. Refrain from the improper storage or use of any fuels, fertilizer, pesticide, fungicide, rodenticide, or herbicide.
24. Pay all applicable application, review for conformance with conditions and annual inspection fees.

25. Fuel shall be stored and handled in compliance with applicable state and local laws and regulations, including the County of Humboldt's Certified Unified Program Agency (CUPA) program, and in such a way that no spillage occurs.
26. The master logbooks maintained by the permittee to track production and sales shall be maintained for inspection by the County.
27. Pay all applicable taxes as required by the Humboldt County Commercial Marijuana Cultivation Tax Ordinance (Humboldt County Code Section 719-1 et seq.).
28. The permittee is not allowed to utilize stringed lighting in the outdoor cultivation greenhouses, and this must be demonstrated through a site inspection.
29. The permittee shall have a dedicated fire suppression tank with a minimum of 2,500-gallon capacity. The designated fire suppression tank shall have the appropriate pipe size and valving requirements for such structures according to the Humboldt County Fire Safe Regulations Ordinance No. 2540 (Humboldt County, 2015) and shall meet minimum CalFire SRA requirements.

#### Performance Standards for Cultivation and Processing Operations

30. 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, the California Agricultural Labor Relations Act, and the Humboldt County Code (including the Building Code).
31. Cultivators engaged in processing shall comply with the following Processing Practices:
  - a. Processing operations must be maintained in a clean and sanitary condition including all work surfaces and equipment.
  - b. Processing operations must implement protocols which prevent processing contamination and mold and mildew growth on cannabis.
  - c. Employees handling cannabis in processing operations must have access to facemasks and gloves in good operable condition as applicable to their job function.
  - d. Employees must wash hands sufficiently when handling cannabis or use gloves.
32. All persons hiring employees to engage in commercial cannabis cultivation and processing shall comply with the following Employee Safety Practices:

- a. Cultivation operations and processing operations must implement safety protocols and provide all employees with adequate safety training relevant to their specific job functions, which may include:
    - (1) Emergency action response planning as necessary;
    - (2) Employee accident reporting and investigation policies;
    - (3) Fire prevention;
    - (4) Hazard communication policies, including maintenance of material safety data sheets (MSDS);
    - (5) Materials handling policies;
    - (6) Job hazard analyses; and
    - (7) Personal protective equipment policies, including respiratory protection.
  - b. Cultivation operations and processing operations must visibly post and maintain an emergency contact list which includes at a minimum:
    - (1) Operation manager contacts;
    - (2) Emergency responder contacts; and
    - (3) Poison control contacts.
  - c. At all times, employees shall have access to safe drinking water and toilets and handwashing facilities that comply with applicable federal, state, and local laws and regulations. Plumbing facilities and water source must be capable of handling increased usage without adverse consequences to neighboring properties or the environment.
  - d. On site-housing provided to employees shall comply with all applicable federal, state, and local laws and regulations.
33. All cultivators shall comply with the approved processing plan as to the following:
- a. Processing practices
  - b. Location where processing will occur
  - c. Number of employees, if any
  - d. Employee Safety Practices
  - e. Toilet and handwashing facilities
  - f. Plumbing and/or septic system and whether or not the system is capable of handling increased usage
  - g. Drinking water for employees
  - h. Plan to minimize impact from increased road use resulting from processing



i. On-site housing, if any

34. Term of Commercial Cannabis Activity Conditional Use Permit & Special Permits. Any Commercial Cannabis Cultivation CUP issued pursuant to the CMMLUO shall expire one (1) year after date of issuance, and on the anniversary date of such issuance each year thereafter, unless an annual compliance inspection has been conducted and the permittees and the permitted site have been found to comply with all conditions of approval.
35. If the inspector or other County official determines that the permittees or site do not comply with the conditions of approval, the inspector shall serve the permit holder with a written statement identifying the items not in compliance, and the action that the permit holder may take to cure the noncompliance, or file an appeal within ten (10) days of the date that the written statement is delivered to the permit holder. Personal delivery or mailing the written statement to the mailing address listed on the application by regular mail, plus three (3) days after date of mailing, shall constitute delivery. The permit holder may request a reinspection to determine whether or not the permit holder has cured all issues of noncompliance. Failure to request reinspection or to cure any items of noncompliance shall terminate the Conditional Use Permit, immediately upon the expiration of any appeal period, or final determination of the appeal if an appeal has been timely filed pursuant to Section 55.4.13.
36. Permit Renewals to Comply with Updated Laws and Regulations. Permit renewal 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.
37. 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 if environmental conditions, such as a sustained drought or low flows in the watershed in which the cultivation area is located, will not support diversions for irrigation.
38. Transfers. Transfer of any leases or permits approved by this project is subject to the review and approval of the Planning Director for conformance with CMMLUO eligibility requirements and agreement to permit terms and acknowledgments. The fee for required permit transfer review shall accompany the request. The request shall include the following information:
- a. Identifying information for the new owner(s) and management as required in an initial permit application;

- b. A written acknowledgment by the new owner in accordance as required for the initial permit application;
  - c. The specific date on which the transfer is to occur;
  - d. Acknowledgement of full responsibility for complying with the existing permit; and
  - e. Execution of an Affidavit of Non-diversion of Medical Cannabis.
39. Inspections. The permit holder and subject property owner are to permit the County or representative(s) or designee(s) to make inspections at any reasonable time deemed necessary to assure that the activities being performed under the authority of this permit are in accordance with the terms and conditions prescribed herein.

**Informational Notes:**

1. Per Section 1273.03 of State Fire Safe Regulations: (a) At no point shall the grade for all roads and driveways exceed 16 percent; (b) The grade may exceed 16%, not to exceed 20%, with approval from the County of Humboldt Planning & Building Department with mitigations, such as paving, to provide for the same practical effect.
2. The permittee shall be aware that the Federal Government considers the cultivation of cannabis to be an illegal activity. This project is accessed by using roads that pass-through lands owned by the Federal Government. The Federal Government may not allow the permittee to use these roads to transport cannabis. In such case, Humboldt County will not provide relief to the permittee. Approval of this permit does not authorize transportation of cannabis across Federal lands.

**RECEIVED**

*By Andrew Whitney at 4:12 pm, Jan 29, 2025*

Old Harris Farms LLC  
January 9<sup>th</sup> 2025  
Revised Operations/Cultivation Plan  
APN: 216-136-006



Prepared by: ETA Management Group LLC  
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## **Operations Plan**

### **Project Description**

This project consists of 19,695 ft<sup>2</sup> of pre-existing outdoor and outdoor light deprivation cultivation, contained within four greenhouses and two outdoor cultivation areas. See table below for dimensions. The project will also utilize two small propagation greenhouses (30' x 40'=1,200ft<sup>2</sup> and 24' x 32'=768ft<sup>2</sup> total 1,968ft<sup>2</sup>) in association with this project. Water for this project is sourced from a rainwater catchment pond and is stored in the pond as well as a series of HDPE water storage tanks. Water storage for this project includes 28,250-gallons (see table for individual sizes below) of HDPE water storage that will be filled from the rainwater catchment pond. There is one 2,500-gallon HDPE water storage tank filled from the groundwater well for Domestic use.

Power for this project is currently supplied by a series of generators, including a gasoline powered Honda EB5000 as well as a Honda EU200i, and a 20kw diesel generator which also powers the domestic use residence. The Honda generators are used primarily for cultivation purposes. The Honda generators are rated at 58db of sound output at the unit, while the larger diesel generator is rated at 69db at the unit. The applicant is building a sound dampening structure for the Diesel generator to comply with the 50db at 100' or at the tree line requirement. The Honda generators output less than 50db at 100' from the unit. Drying and curing will take place in the 20' x 30'=600ft<sup>2</sup> drying structure. Harvest Storage will occur in the 24' x 36'= 964ft<sup>2</sup> secured Harvest room. The applicant will process off site and utilize an existing Portable Toilet with a service contract.

Irrigation water for this project is sourced from a rainwater catchment pond and stored in 28,250-gallons of HDPE water storage tanks. See rainwater catchment analysis below for more details.

### **Land Features**

Cultivation greenhouses were built on an existing flat on the land, and the outdoor cultivation areas are built on existing historical skid roads.

### **Access to Property**

The site is located on a private driveway that comes off of Old Harris Road in the Harris Area. Property is accessed via a shared, gated driveway. See google maps for specific driving directions.

### **Proximity**

The nearest neighboring properties are 2021 feet to the South, 708 feet to the east, 388 feet to the North, and 1320 feet to the West from the cultivation/drying sites. There are no schools, school bus stops, public parks, public lands, hiking trails or tribal resources within 600 ft of the property.

### **Equipment/ Power**

Power for this project is currently supplied by a series of generators, including a gasoline powered Honda EB5000 as well as a Honda EU200i, and a 20kw diesel generator which also powers the domestic use residence. The Honda generators are used primarily for cultivation purposes. The Honda generators are rated at 58db of sound output at the unit, while the larger diesel generator is rated at 69db at the unit. The applicant is building a sound dampening structure for the Diesel generator to comply with the 50db at 100' or at the tree line requirement. The Honda generators output less than 50db at 100' from the unit.

## **Petroleum Based/ Fuel Products**

Project site will not store any Hazardous Waste in threshold beyond domestic use. If any additional storage of hazardous waste becomes necessary, an appropriate application will be filed with DHHS.

Any above ground storage tanks and containers shall be provided with a secondary means of containment for the entire capacity of the largest single container and sufficient freeboard to contain precipitation. Onsite fuel storage tank is on a flat stable surface, within secondary containment and under a roof. All five-gallon gasoline cans are stored with secondary containment inside of shed or similar enclosure on flat, stable areas. The applicants will implement spill prevention, control, and countermeasures (SPCC). There are no underground storage tanks on the property. All petroleum products on property are stored with secondary containment inside of a shed or similar enclosure on flat, stable areas.

## **Solid Waste/ Recycling**

Solid waste and recycling shall be stored in a location and manner that prevents its discharge to receiving waters and prevents any leachate or contact water from entering or percolating to receiving waters. All solid waste and recycling are stored in cans with lids on a stable, flat area. The cans are secured to exclude wildlife. Solid waste and recycling shall be disposed of at an authorized municipal waste transfer station. It will be taken to by personal vehicle, i.e., truck, 1-3 times per month depending on garbage accumulation.

## **Solid Waste and Recyclables Disposal**

Redway Transfer Station  
California Conservation Camp Rd.  
Redway, CA 95560707-923-3944  
<https://www.recology.com/recology-eel-river/redway-transfer-station/>



## Cultivation Plan

This project will consist of four (4) outdoor light deprivation greenhouses and two outdoor cultivation areas, with one ancillary propagation area consisting of two (2) greenhouses. All cannabis will be grown outdoor and in greenhouses. Cannabis will be grown utilizing full sun and light deprivation cultivation techniques. All cannabis is harvested and dried on site.

## Cultivation Areas

Cultivation Area	Cultivation Type	Cultivation Area	Structure Sizing
Greenhouse 1 (cultivation area 1)	Outdoor Light Deprivation Greenhouse	2,200 ft <sup>2</sup>	20' x 110'
Greenhouse 2 (Cultivation area 1)	Outdoor Light deprivation Greenhouse	2,200 ft <sup>2</sup>	20' x 110'
Greenhouse 3 (cultivation area 1)	Outdoor Light Deprivation Greenhouse	2,200ft <sup>2</sup>	20' x 110'
Greenhouse 4 (cultivation area 1)	Outdoor Light Deprivation Greenhouse	1,800ft <sup>2</sup>	90' x 20'
Cultivation Area 2	Full Sun outdoor Cultivation	5,868ft <sup>2</sup>	489' x 12'
Cultivation Area 3	Full Sun Outdoor Cultivation	5,427ft <sup>2</sup>	See below
Propagation area	Ancillary Propagation	1,968ft <sup>2</sup>	Contains two GHs*

Greenhouse 1- This is a 20' x 110' (2,200ft<sup>2</sup>) greenhouse that will be utilized for light deprivation cultivation.

Greenhouse 2- This is a 20' x 110' (2,200ft<sup>2</sup>) greenhouse that will be utilized for light deprivation cultivation.

Greenhouse 3- This is a 20' x 110' (2,200ft<sup>2</sup>) greenhouse that will be utilized for light deprivation cultivation.

Greenhouse 4- This is a 20' x 90' (1,800ft<sup>2</sup>) greenhouse that will be utilized for light deprivation cultivation.

\*Propagation Area- This is a 1,968ft<sup>2</sup> area consisting of two greenhouses (30' x 40'=1,200ft<sup>2</sup> and 24' x 32'=768ft<sup>2</sup>) that will be utilized for ancillary propagation. These greenhouses will contain supplemental lighting to aid the plants in early season vegetation.

## Ancillary Support Structures

Pesticide Nutrient Storage	20' x 30'	600ft <sup>2</sup>
Drying and curing	20' x 30'	600ft <sup>2</sup>
Harvest Storage	23' x 36'	864ft <sup>2</sup>

Pesticides and nutrients will be stored in a locked 20' x 30', 600ft<sup>2</sup> shed. Drying and curing will take place in the 20' x 30' drying room. Secure harvest storage will take place in the 23' x 36', 864ft<sup>2</sup> Harvest Storage Building. The applicant will process off site and utilize a Portable Toilet with a service contract.

## Immature Plants

Each spring the Applicant takes cuttings or clones from mother plants or purchases clones from a licensed nursery and rears them in propagation greenhouse until plants are ready to be moved to flowering greenhouses. Immature plants will be cultivated in two (2) greenhouses. Artificial lights will facilitate plant growth and hinder plants from moving into flowering stages ahead of cultivation schedule. All lighting will be shielded with black out tarps and checked daily for light

leaks.

## Cultivation Cycles

The Applicant cultivates in light deprivation greenhouses in two cycles from April to October. The first cycle is from April to July, the second cycle is from roughly July to October. The Applicant uses supplemental light inside the propagation greenhouse to start plants. The Applicant uses a blackout tarp over the flowering greenhouses, at regular intervals to impede natural sunlight. No artificial lighting in flowering greenhouses.

There are companion plants, native grasses and indigenous plants that grow in the garden and around the area to also help control any type of run off. There are no signs of wastewater runoff or erosion in these gardens. Hay is also spread around the area and on the topsoil. The water line as well as manifolds and fittings will be checked on a regular basis for leak or cracks.

## Monthly Cultivation Site Activities

Month	Activities
January	Finish processing of fall harvest, trimming and storage. Plan new year. Mow cover crop. Check greenhouses for issues/fix. Check water lines, tanks and all equipment for repairs or damages. Make plan for repairs.
February	Work on trenches/and holes for plants layer more compost in beds. Treat compost if necessary. Finishing processing last year's crop if still necessary.
March	Get clones from other permitted grow operation. Transplant and move into greenhouse with seedlings. Amend beds, fix fences, service equipment, make plan for independent contractors i.e.; painting, fence building, greenhouse fixing, etc.
April	Amend and start turning beds, prep dirt and supplies for greenhouse plants Add nematodes compost for pest prevention. Mid- April move first round of plants to greenhouses. Weed whacking, mowing, and brush cleanup.
May	Spray with preventive sulfur. Treat with biodynamic preparations for pest control and mold control. Greenhouse plants switched into flower using a blackout cover mid-late May. Turn beds, fix/ replace and clean drip emitters, check timers. Double check all water systems for leaks and clogs. Put out sound sensors for rodents.
June	Regular feeding schedule of compost teas adhered to. Pests are dealt with as they arise with oils, nematodes and predator mites from compost. Procure next round of plants from licensed nursery.
July	Harvest greenhouse mid-month, replant with new clones from a permitted nursery. Treat plants with preventive measures. Harvested flowers to hang in drying area then to be cured and hand trimmed per processing plan.
August	Finish processing July's harvest. Monitor water supply, check lines and all areas for insect/ animal disturbance.
September	Prepare for Harvest. Clean and prepare lines and drying spaces in drying room. Clean all supplies and purchase new items needed. Harvest, cure and trim as outlined above in processing plan.
October	Harvest greenhouses. Process as outlined above. Pull all root-balls, pack hay and cover crop seeds on beds. Pull drip system. Check all equipment and tools for leaks and damages before storing for winter. Store all supplies possible, cleanup site.



November	Finish harvesting plants if necessary. Winterize water system, greenhouses, and sheds. Clean up drying rooms remove all lines and debris. Put away all supplies i.e. fans, dehumidifiers. Continue processing cannabis as outlined above.
December	Start amendments for winter. Prep all water and water storage system for shut down. Clean all garden implements. Put all left over supplies away. Driveway fixing, other farm/garden maintenance.

## Processing Plan

### Harvest

Cannabis will be harvested using gloves and clean tools. All cannabis will be hung to dry in the existing drying room. Dehumidifiers and fans will aid drying in the building. Cannabis will be dried for 10-14 days on lines in these areas depending on weather. The room will have proper ventilation, fans, and dehumidifiers to maintain proper environment. Moldy cannabis will be removed and destroyed using county and state approved procedures for holding and destroying unwanted product.

### Curing

Curing will take place after cannabis is dried on the lines. Cannabis will be visually checked for mold then placed into plastic totes for curing. During this time the bins will be checked for mold and moisture consistency. Curing cannabis will be stored in drying room. Moldy or defective cannabis will be removed and destroyed using county and state approved procedures for holding and destroying unwanted product.

### Processing

Cannabis Trimming will occur as cannabis becomes ready from curing process. Trimming will physically take place off site. Processed cannabis will be bagged into turkey bags or sealed bags to be held until a distributor is ready. The trim or remaining leaves from processed cannabis, will be bagged into contractor bags to be stored until needed, sold, or destroyed in the legal manner.

### Processing- Employees and Contractors

Employees are not anticipated, but, if necessary, the applicant will have a maximum of four employees during busy times of the season. Employees will be seasonal and subcontracted as possible. Employees and contractors will have access to parking, spacious work zone, clean supplies for task, hand washing areas with soap, bathroom with sink and flushing toilet and break area. Fresh spring water is available, but workers are encouraged to bring their own drinking water. All areas are kept clean and in good condition All employees and/ or contractors will have access to personal safety equipment to meet the needs of the job for example, face mask, gloves, Tyvek suits, safety glasses, rubber boot covers etc. There are no worker sleeping quarters on site. Workers are encouraged to carpool to work daily, and the applicant intends to mitigate any additional traffic on Old Harris Rd., by reducing his own travel during times he has workers.

## **Worker Safety Practices**

Safety protocols will be implemented to protect the health and safety of employees. All employees shall be provided with adequate safety training relevant to their specific job functions, which may include:

- Employee accident reporting

- Security breach

- Fire prevention

- Emergency Numbers

## **Materials handling policies**

Use of protective clothing such as long sleeve shirts, brimmed hats, and sunglasses. Each garden site and or processing area have the following emergency equipment:

Personal protective equipment including gloves and respiratory protection are provided where necessary

- Fire extinguisher

- First Aid Kit

- Snake Bite/Bee Sting Kit

- Eye Washing Kit

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).

## **Parking Plan**

There are three parking spaces in front of the secured harvest building. There are also two parking spaces in front of cultivation area 3.

## **Security Plan**

The private driveway off Old Harris Road has a gate that we keep locked at all times for security purposes. The Secured Harvest room is also long-term storage for cannabis and is always locked. No items of value shall be left in visible areas. The applicant plans to add a camera system to each of the gardens with a central base at the cabin or connected to smartphone once the parcel becomes internet capable.

## Domestic Wastewater

Domestic wastewater for this project is currently handled by a portable toilet with a service contract. This portable toilet is serviced regularly by B&B Portable Toilets.

## Water Irrigation and Storage Plan

### Water Storage and Usage

Irrigation water for this project is sourced from a rainwater catchment pond with a capacity of approximately 511,000-gallons and 28,250-gallons in HDPE tank storage. Rainwater is collected from the rainwater catchment pond and fills the HDPE water storage tanks, which are all plumbed together to insure even filling. The pond is 6,832ft<sup>2</sup> in size and has an average depth of 14 feet which calculates to a capacity of 511,000- gallons. Total water storage is 539,250-gallons. This rainwater catchment system will collect more water than is needed for this project. See rainwater analysis below. Water use for this project is estimated to be 170,000-gallons annually. Domestic water will be sourced from the existing groundwater well. The pond can also be used for fire protection if necessary.

### Water Infrastructure

Type/Size of infrastructure	Water Source	Use
511,000-gallon rainwater catchment pond	Rain	Irrigation
1 QTY 5,000-gallon HDPE tanks	Rain	Irrigation
3 QTY 3,000-gallon HDPE tanks	Rain	Irrigation
4 QTY 2,500-gallon HDPE tanks	Rain	Irrigation
1 QTY 1,500-gallon HDPE tanks	Rain	Irrigation
3 QTY 750-gallon HDPE tanks	Rain	Irrigation
1 QTY 500-gallon HDPE tank	Rain	Irrigation
1 QTY 2,500-gallon HDPE tank	Groundwater Well	Domestic
Domestic water source	Groundwater Well	Domestic

### Annual Water Usage

Month	Cannabis water use in Gallons (Rainwater)	Domestic Water Use in Gallons (Groundwater Well)
January	0	3,000
February	0	3,000
March	0	3,000
April	8,500	3,000
May	16,200	3,000
June	32,500	3,000
July	35,600	3,000
August	36,000	3,000
September	31,800	3,000
October	9,400	3,000
November	0	3,000



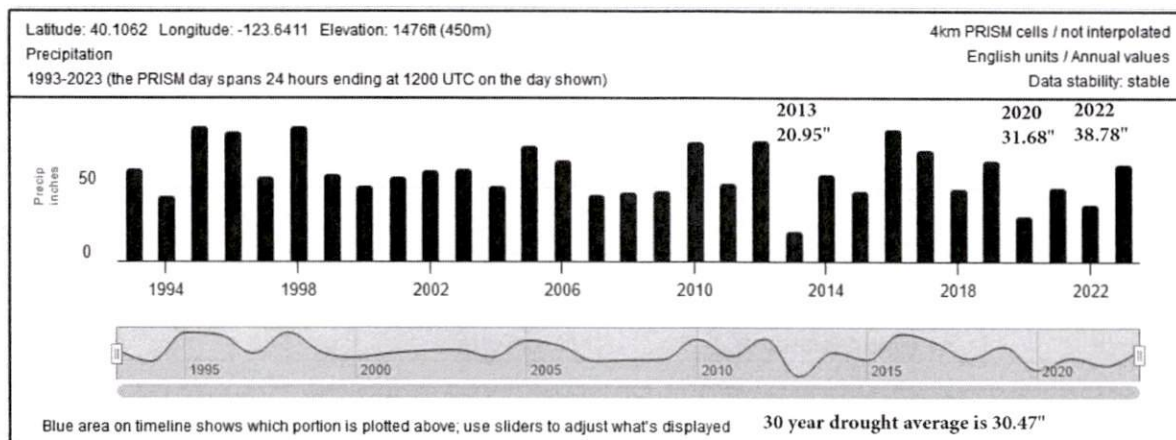
December	0	6,000
<b>Totals</b>	<b>170,000-gallons</b>	<b>39,000-gallons</b>

### Rainwater Catchment Analysis- Lowest rainfall average for drought years in the past 30 years

Irrigation water for this project is sourced from an offstream pond with 28,250-gallons in HDPE tank storage. Rainwater is collected in the offstream pond and fills the HDPE water storage tanks, which are all plumbed together to insure even filling. A rainwater catchment analysis was completed using prism.oregonstate.edu/explorer to analyze the capability of the rainwater catchment to capture sufficient water for the project. The rainwater catchment surface is 6,832ft<sup>2</sup>. The average rainfall was taken from the lowest rainfall years from the past 30 years (1993-2023), which were 2013 at 20.95", 2020 at 31.68" and 2022 at 38.78". Average drought year rainfall amount is 30.47".

The rainwater catchment system will collect rainwater in the offstream pond. Using this metric the Rainwater catchment surface of 6,832ft<sup>2</sup> x 30.47 x 0.6234 = 129,773-gallons annually can be collected in this offstream pond. However, the metric below describes much more accurately how much water can be collected annually from this rainwater catchment system.

### Rainwater Catchment Analysis Graph from Prism.oregonstate.edu/explorer- Annual Values over 30 years- Drought year Map



### Rainwater Catchment Analysis- Average rainfall for decade 2013-2023

Irrigation water for this project is sourced from an offstream pond with 28,250-gallons in HDPE tank storage. Rainwater is collected in the offstream pond and fills the HDPE water storage tanks, which are all plumbed together to insure even filling. A rainwater catchment analysis was completed using prism.oregonstate.edu/explorer to analyze the capability of the rainwater catchment to capture sufficient water for the project. The rainwater catchment surface is 6,832ft<sup>2</sup>. The average rainfall was taken from the average rainfall in the previous decade (2013-2023). See table below

Year	Rainfall Amount (in inches)
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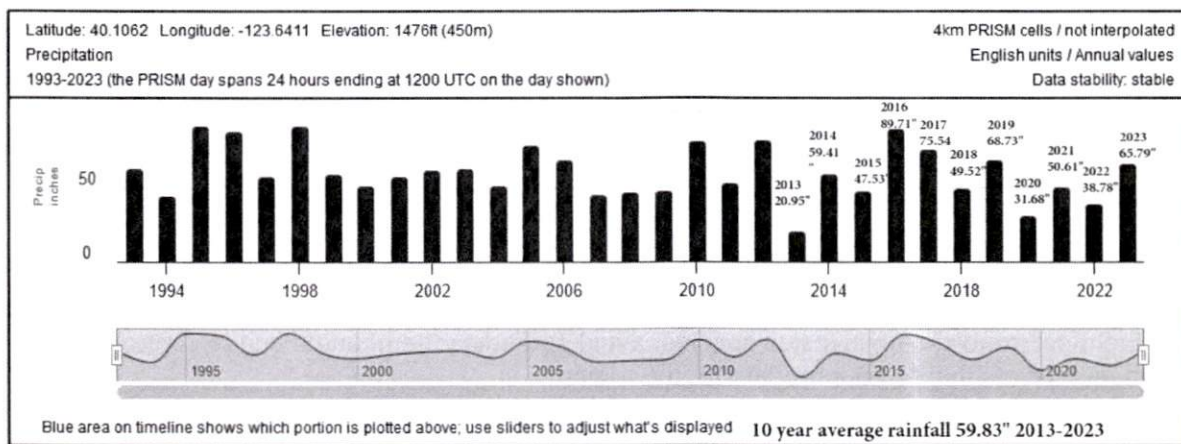
2013* severe drought year	20.95"
2014	59.41"
2015	47.53"
2016	89.71"
2017	75.54"
2018	49.52"
2019	68.73"
2020* severe drought year	31.68"
2021	50.61"
2022* severe drought year	38.78"
2023	65.79"

Average ten-year rainfall amount (2013-2023) is 59.83".

The rainwater catchment system will collect rainwater in the offstream pond.

Using the metrics of the average rainfall in the past decade (2013-2023), which includes all three of the most severe drought years in the past 30 years, rainwater catchment surface  $6,832\text{ft}^2 \times 59.83" \times 0.6234 = 254,820$ -gallons annually can be collected in this offstream pond. This much more accurately identifies how much water on average can be collected annually in this offstream pond. See graph below.

#### Rainwater Catchment Analysis Graph from Prism.oregonstate.edu/explorer- Annual Values over 30 years- Average rainfall 2013-2023





## Noise Control Plan

Noise from this cannabis cultivation operation would be limited to the noise from running generators, and fans and dehumidifiers in the drying room. Power for this project is currently a series of generators. The two Honda Generators are rated at 58db at the unit, and the diesel generator is rated for 69db at the unit. The diesel generator will be housed in a noise dampening enclosure. Noise generated by this project is not expected to extend beyond 50 decibels at 100 feet away from the generator. The diesel generator is also the power source for the domestic residence and is not expected to run at any time that it is not powering the domestic residence.

## Invasive Species Control Plan

Invasive plant species must be managed on cultivation sites in Humboldt County, under the current regulations governing cannabis cultivation activities.

The sixteen most harmful weeds in Humboldt County include: Scotch broom (*Cytisus scoparius*), Pampas grass (*Cortaderia jubata*), gorse (*Ulex Europaea*), Himalaya berry (*Rubus discolor*), English ivy (*Hedera helix*), Cape ivy (*Delairia odorata*), European beachgrass (*Ammophila arenaria*), Ice plant (*Carpobrotus edulis*), yellow bush lupine (*Lupinus arboreus*), yellow star thistle (*Centaurea solstitialis*), spotted & diffuse knapweed (*Centaurea maculosa* & *Centaurea diffusa*), bull & Canada thistle (*Cirsium Vulgare* & *Cirsium arvense*), common reed (*Phragmites australis*), Spanish heath (*Erica lusitanica*), and Chilean cordgrass (*Spartina densiflora*). Most potential invasive species are likely limited to species such as Pampas grass, Scotch Broom, Himalayan Blackberry, Italian Thistle, Canada Thistle and English Ivy.

Invasive plant species easily colonize new and disturbed areas with increased traffic. Invasive species should be dealt with immediately by manual/mechanical labor such as removing the plant, root ball and remaining vegetation by hand shovel, cutting, and sawing. Prevention can be encouraged with mulching. Biological controls are not recommended as this is not usually an effective method and can enter streams and waterways.

The applicant employs following methods to help prevent the introduction and spread of invasive species.

- Cleans outdoor recreation gear.
- Not releasing any unwanted pets or fish into the wild
- Identifying the most troublesome invasive species, avoid spreading them, and trying to control them.
- Using only native plants that are appropriate for the region.
- Cleans all machines before and after use.
- Avoid disturbing natural areas whenever possible.
- Remove any invasive plant species using the hand pulling method to mitigate regrowth and the spread of seed.

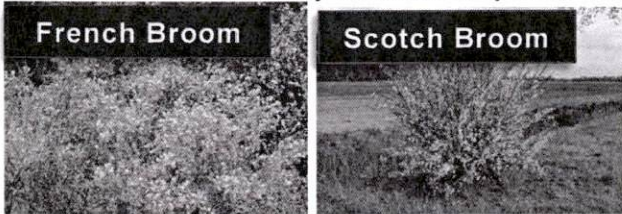
If any of these invasive species are encountered, the applicant will use the hand pulling method to remove the invasive species, while mitigating regrowth and preventing the spread of seed. All Hand pulling of invasive species will be done wearing gloves and protective clothing. The applicant will mitigate the spread of invasive species by removing invasive species throughout the cultivation area and around the parcel using hand pulling method and dispose of them in a manner that would prevent spread.

Several site visits have been conducted by our in-house biologist. He has reviewed these materials with the farm operators. All invasive species located have been removed thus far. The site will be monitor regularly for invasive species and they will be removed promptly once located and identified.

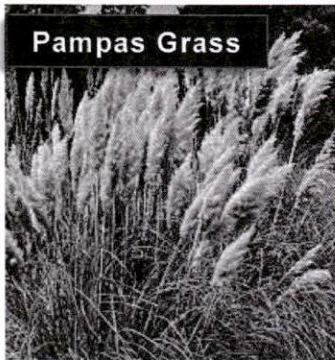


The following Invasive Species occur in Humboldt County. This list is being provided for easy referral to identify potential species. ***This is not a representation of the actual site.***

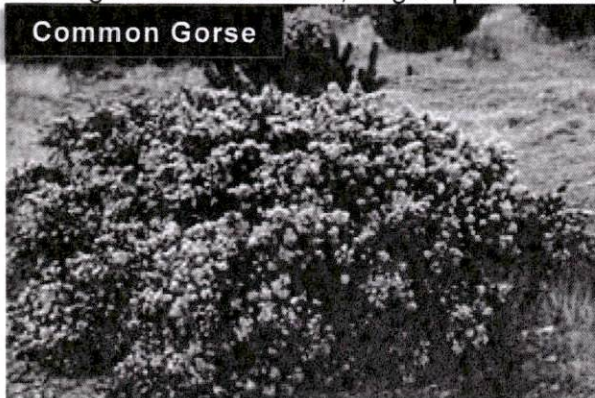
**French and Scotch Broom** (*Genista & Cytisus spp.*) With many roadside and grassland populations scattered throughout Humboldt County, brooms threaten to rapidly convert productive grasslands to unproductive shrub stands. Brooms are easily identified as yellow-flowered shrubs with small or no leaves.



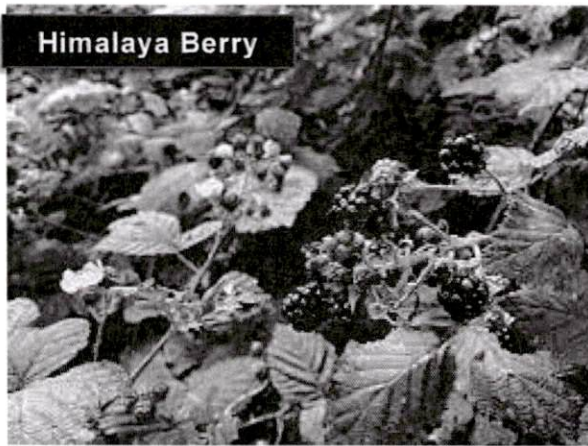
**Pampas / Jubata Grass** (*Cortaderia spp.*) Present throughout Humboldt County, Pampas grass alters native shrub, grass and post-logging forest lands by excluding native plants. It is easily identified by its tall, feather-like seed stalks. Difficult to pull once large, plants are better removed when small.



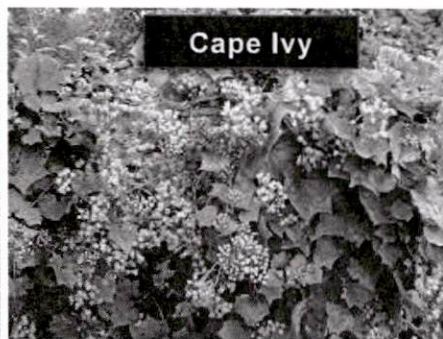
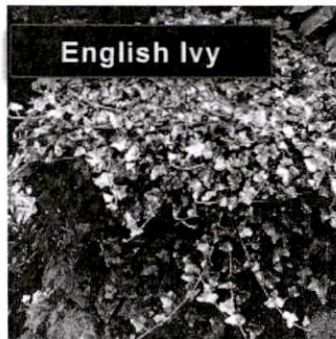
**Common Gorse** (*Ulex europaea*) An invader of native coastal prairies, this shrub is most easily identified by its long, sharp spines, fuzzy foliage, and yellow flowers. Like brooms, this plant threatens to change diverse, native grasslands to dense, single species stands of shrubs. The plant's flowers are a deep yellow color.



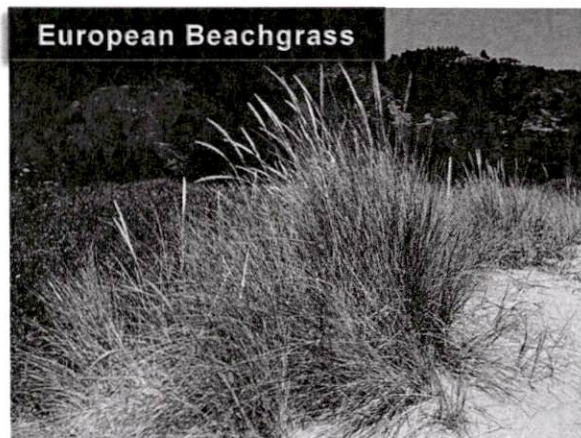
**Himalaya Berry** (*Rubus armeniacus*), the Himalayan blackberry or Armenian blackberry, is a species of Rubus in the blackberry group Rubus subgenus Rubus series Discolores Focke. It is native to Armenia and Northern Iran, and widely naturalised elsewhere



**English and Cape Ivy** (*Hedera* spp. & *Delairea odorata*) These invasive vines climb over and cover native plants and trees growing in shaded places. Ivies will smother and weigh down trees and will carpet over a previously rich forest floor.

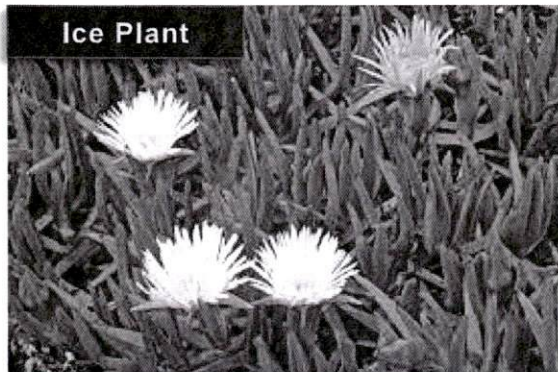


**European Beachgrass** (*Ammophila arenaria*) is a clumping perennial grass (family Poaceae) found in coastal dune systems from Santa Barbara County north. European beachgrass grows more densely than native American dunegrass trapping passing sand and creating steep dunes. This stop new sand from reaching interior dunes, changing the structure and ecology of dune ecosystems. Native plants often cannot compete with dense stands of European beachgrass.

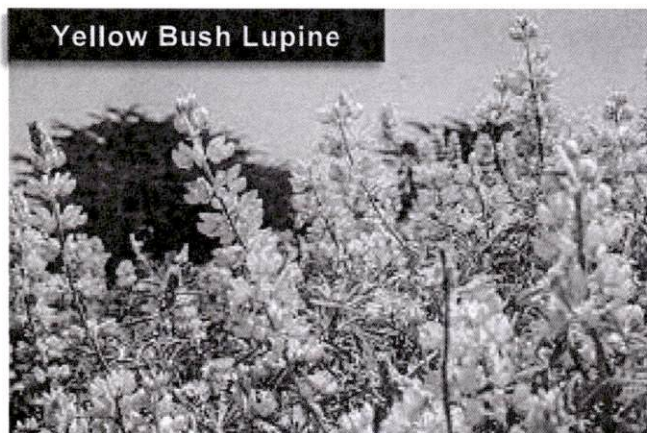




**Ice plant** (*Carpobrotus edulis*) is a ground-hugging succulent perennial that roots at the nodes, has a creeping habit, and often forms deep mats covering large areas. Shallow, fibrous roots are produced at every node that is in contact with the soil.



**Yellow Bush Lupine** (*Lupinus arboreus*) An invader of coastal dunes, this plant overwhelms diverse native dune flowers and enriches the soil, paving the way for invasive annual grasses. It is easily identified as the shrub in the dunes with the many bright yellow spikes of flowers.



**Italian, Yellow Star, Canada, and Bull** (*Centaurea* & *Cirsium* spp.) This suite of invasive thistles infests native grasslands, roadsides and fields. These species displace native plants and are often noxious to native wildlife and livestock.





**Italian Thistle**



**Yellow Star**



**Bull Thistle**



**Canada Thistle**

**Spotted Knapweed** (*Centaurea maculosa*) is a biennial or short-lived perennial with a deep taproot. The taproot forms a new shoot each year. Early in the season, the plant appears as a rosette, a leafy prostrate plant. Its rosette leaves develop on short stalks at the base of the plant. They are grayish green and deeply divided into oblong lobes.



**Spotted Knapweed**

**Spanish Heath** (*Erica lusitanica*) While this low woody shrub is native to Europe, it now grows here in open, coastal areas with sandy soils. The shrub's flowers appear as many pinkwhite bells hanging on branches with soft, needle-like leaves.

**Spanish Heath**



**Common Reed** (*Phragmites australis*) More invasive strains originated in Europe. Invasive European strains probably introduced during the 1800s Crowds out native species to prevent growth.

**Common Reed**



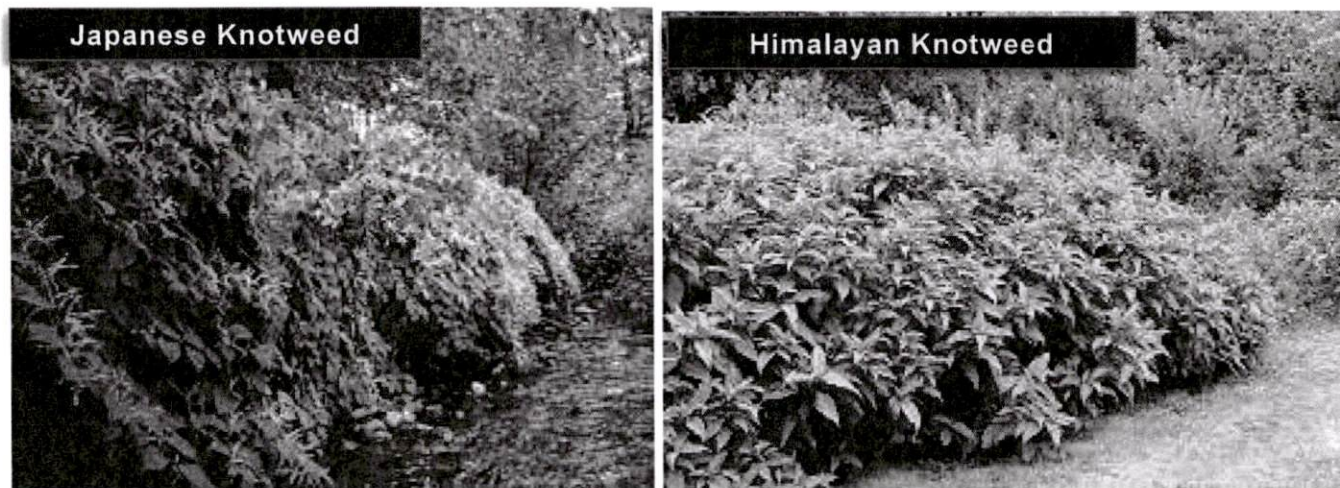
**Chilean Cordgrass** (*Spartina densiflora*) a dense-flowered cordgrass is a rhizomatous perennial grass (family Poaceae) found in salt marshes in Humboldt Bay and San Francisco Bay. Dense-flowered cordgrass may have been introduced to Humboldt Bay from Chile by lumber ships in the 19th century.

**Chilean Cordgrass**





**Japanese and Himalayan Knotweed** (*Polygonum* spp.) Invasive knotweeds can grow from very small amounts of leaf or stem, increasing the chance that plants growing on stream banks may aggressively expand and outcompete native plants.



## **Soils Management Plan**

### **Cultivation Soils**

All soil from cultivation site will be reused and never dumped. Reused meaning the applicant either tills the soils in place in the garden areas or creates a pile with straw wattles at the bottom and covers with black plastic. These areas will meet all BMP's required. Applicant amends the garden soils every year with basic amendments. Greenhouses plants are planted in beds directly in the ground. Protection from overuse of inputs and reuse of these soils shall be a key component of operations. Operations will protect the resources through the following means:

The Site management plan will be implemented, Cultivations will occur in beds, air pots, or in the ground. Mixing, tilling, and amending of soils will occur within the receptacles. Composting is in a secure dedicated area. Vegetative materials will be chipped back into the compost pile. Cover crops will be utilized when not in cultivation for a month or more to reduce soil loss. Garbage from the cultivation is limited to bags from amendments and fertilizer containers. All items will be cleaned out properly into the garden area, recycled if possible and if not removed to the transfer station.

Cultivation-related wastes including, but not limited to, empty soil/soil amendment/ fertilizer/pesticide bags and containers, empty plant pots or containers, dead or harvested plant waste, and spent growth medium shall, for as long as they remain on the site, be stored at locations where they will not enter or be blown into surface waters, and in a manner that ensures that residues and pollutants within those materials do not migrate or leach into surface water or groundwaters.

## **Stormwater management Plan**

### **Erosion Control**

This cultivation site is mostly flat. Daily inspections to verify that spoils are not stored or placed in or where they can enter any surface water. Spoils will be adequately contained or stabilized to prevent sediment delivery to surface



waters. Spoils generated through development or maintenance of roads, driveways, earthen fill pads, or other cleared or filled areas shall not be side cast in any location where they can enter or be transported to surface waters. We will use appropriate erosion control measures to minimize erosion of disturbed areas, potting soil, or bulk soil amendments to prevent discharges of waste. Fill soil shall not be placed where it may discharge into surface water. Weed-free straw mulch is used on exposed soils and, if warranted by site conditions, shall be secured to the ground. We will not plant or seed

noxious weeds. Prohibited plant species, only locally native, non-invasive, and non-persistent grass species will be used for temporary erosion control. We will incorporate erosion control and sediment detention devices and materials into the design, work schedule, and implementation of all cannabis cultivation activities. Measures to limit or prevent erosion, include, but are not limited to, removal of fill from watercourses, stream restoration, riparian vegetation planting and maintenance, soil stabilization, erosion control, upgrading stream crossings if needed, road out sloping and rolling dip installation where safe and suitable as needed, installing ditch relief culverts and over side drains if prescribed, stabilizing unstable areas, reshaping cut banks, and rocking native-surfaced roads. We will do our best to implement all applicable Erosion Control and Soil Disposal and Spoils Management Requirements in addition to the Winterization Requirements below by the onset of the winter period (November 15).

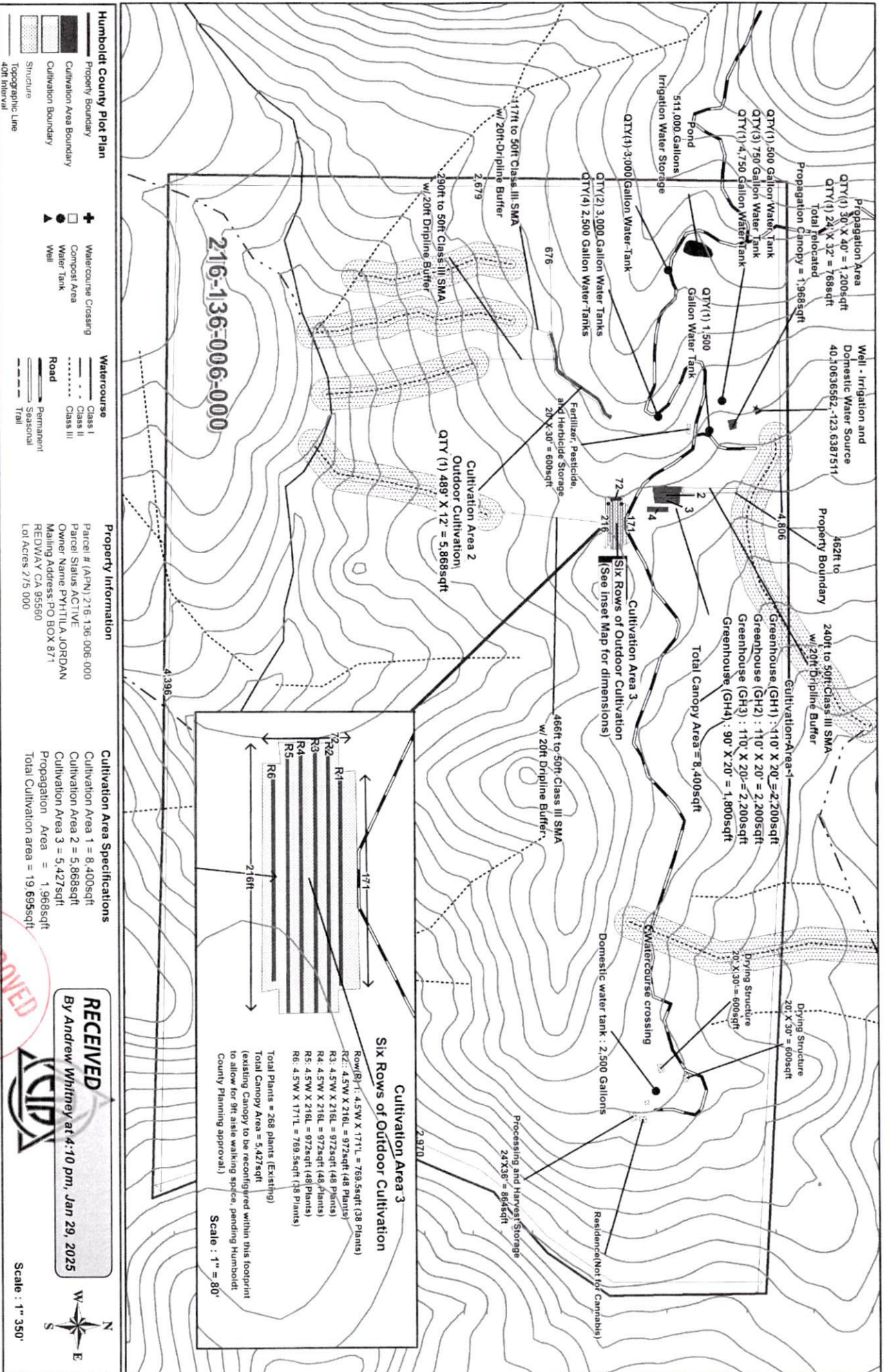
### **Measures to Protect Watershed**

All spraying of plants for any type of pest control, mildew/mold control or foliage feeding is done when winds are at 0 and sprayed directly onto plants without over spray. No generators or household projects of any sort happen within 200 ft feet of the watershed. No pumping or dumping ever occurs in watershed. All fertilization of plants is monitored closely. Fertilizer comes from separate tanks. Implementing water conservation measures, irrigating at conservative rates, applying fertilizers at conservative rates, applying chemicals according to the label specifications, and maintaining stable soil and growth media should serve to minimize the amount of runoff and the concentration of chemicals in that water. If irrigation runoff occurs, measures shall be in place to treat/control/contain the runoff. We try to be water conservative and use no more than what is required. Irrigation runoff will be contained so that any pollutants are trapped in the ditch relief. Irrigation runoff will be managed so that any entrained constituents, such as fertilizers, fine sediment and suspended organic particles, and other oxygen consuming materials are not discharged to nearby watercourses. We will do our best to ensure that irrigation tailwater is not discharged towards or impounded over unstable features or landslides.

### **Light Pollution Control Plan**

The only light applicant uses is supplemental light for immature plants. Immature plants are located in the propagation greenhouses. Area is well maintained and inspected for light leaks every day that plants are under this light. The light is small supplemental light 30-40 22w light bulbs. Each Entire propagation greenhouse is blacked out with black plastic to prevent light leaks. Applicant guarantees that there are no light leaks coming from the propagation greenhouses.





APPROVED  
 FEB 20 2025  
 Humboldt County  
 PLANNING

**RECEIVED**  
 By Andrew Whitney at 4:10 pm, Jan 29, 2025

**CDP**

Scale : 1" = 350'