



COUNTY OF HUMBOLDT
PLANNING AND BUILDING DEPARTMENT
CANNABIS SERVICES DIVISION

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

July 15, 2019

Paradise Valley, LLC
Attn: Aaron Lieberman
PO Box 363
Arcata, CA 95518

RE: Permit Application No. 12303 and 12301
APN: 220-292-015, 220-292-017, and 220-292-018

Dear Paradise Valley, LLC

Thank you for your submittal of the above referenced applications for commercial cannabis permits for 19,920 square feet of existing outdoor cultivation (App#12303) and for 11,000 square feet of existing outdoor cultivation (App#12301). Unfortunately, after review, the application submittal was found not to contain all the required information and we are unable to move the permit forward at this time.

Below is listed the information we need to continue processing this permit application:

- 1) Please submit a revised Cultivation and Operations Plan reflecting the following changes or providing additional information not present in the Plan submitted 6/12/2019:
 - a. Per the issued Interim Permit, the cultivation area is outdoor. Please remove all references to mixed light and change to outdoor. Outdoor cultivation can include light deprivation, but no supplemental lighting can be used on an outdoor site, except for light used in a propagation space.
 - b. Clarify nursery/propagation space on the parcel. Page 11 reads that "On parcel 220-292-015, the full 19,920 square feet will be cultivated on Flat A. The greenhouses will be reconfigured to allow for slope reduction on the lowest toe slope. Flat A will be used only as a nursery." This does not make sense. Is Flat A used for cultivation activities, for propagation activity, or for both?
 - i. State the exact dimensions of space to be used for propagation and whether it will take place in a greenhouse, hoop house, etc.
 - ii. State whether supplemental lighting will be used in the propagation space.
 1. If supplemental lighting is used in the propagation space, the space must be fully shielded to prevent light escape between 30 minutes prior to sunset and 30 minutes after sunrise in compliance with International Dark Sky Standards. Please describe how you will comply with this requirement.
 - c. Provide a schedule of activities during each month of the growing and harvesting season. Include how much water will be used each month.
 - d. Describe your irrigation plan. How will stored water get from your tanks and ponds to your cannabis plants (hand water, drip system, etc.).

- e. State the water source and/or stored water intended for fire suppression. Should be accessible to a fire truck. Recommendation is 2,500 gallons minimum for rural properties.
 - f. Due to the presence of noise-sensitive species near the project, generators must be used within a containment structure or otherwise shielded such that noise levels be below 50 decibels at 100 feet from the generator. Please describe your plans to attenuate generator noise.
 - g. Please provide a maximum number of employees who work or will work on your site. If you will have any employees, please provide the following information:
 - i. Describe the drinking water available to employees.
 - ii. Describe any increased road use resulting from employment and a plan to minimize that impact (carpooling, etc.).
 - iii. Describe on-site housing that will be available to workers, if any.
 - h. Please provide the following information pursuant to your processing plan:
 - i. Describe the location where drying will occur.
 - ii. Describe the location where trimming will occur. Note that trimming must occur in a structure with a commercial permit. This usually requires an approved Onsite Wastewater Treatment System (OWTS) and an ADA accessible restroom. Please contact the Building Division at 707-445-7245 for additional information about their requirements for processing structures. Please note that you can always reserve the right to process off site with a licensed third-party processor.
- 2) Please complete the attached Department of Environmental Health (DEH) worksheet for each of your projects.
 - 3) Please submit a replacement \$30 check or money order made payable to the Bear River Tribal Historic Preservation Office (THPO). The one previously on file has expired due to 180 days elapsing. We will need one check for each of your projects (#12303 and #12301).
 - 4) Please submit a Road Evaluation Report for each of your projects. See the attached form.
 - 5) Please provide a Biological Survey once available.
 - 6) Please provide a Final Streambed Alteration Agreement for the points of diversion once available.

Without this requested information the Department is unable to fully evaluate this project for compliance with the findings specified in Humboldt County Code Sections 312-1.1.2 and 312-17 et seq., and the California Environmental Quality Act (CEQA). Until this additional information is received we must suspend further evaluation of your project application.

We understand that securing this documentation may require additional work by you or by others on your behalf. We appreciate your making this effort. When you have assembled all the requested material, submit these items **as a package** to the Cannabis Planner on Duty (CPOD) during regular business hours. When submitting these items, please include the Application Number and APN found at the top of this letter. Once the required information is received processing your application will promptly resume.

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 Liza Welsh at 707-445-7541 or lwelsh@co.humboldt.ca.us.

Sincerely,

Liza Welsh,
Cannabis Planner

Attachment I – Road Evaluation Report Form

Attachment II – Department of Environmental Health Worksheet



ARCATA-EUREKA AIRPORT TERMINAL
McKINLEYVILLE
FAX 839-3596

AVIATION 839-5401

DEPARTMENT OF PUBLIC WORKS

COUNTY OF HUMBOLDT

MAILING ADDRESS: 1106 SECOND STREET, EUREKA, CA 95501-0579
AREA CODE 707

PUBLIC WORKS BUILDING
SECOND & L ST., EUREKA
FAX 445-7409

ADMINISTRATION
BUSINESS
ENGINEERING
FACILITY MAINTENANCE

445-7491
445-7652
445-7377
445-7493

NATURAL RESOURCES
NATURAL RESOURCES PLANNING
PARKS
ROADS & EQUIPMENT MAINTENANCE

445-7741
267-9540
445-7651
445-7421

CLARK COMPLEX
HARRIS & H ST., EUREKA
FAX 445-7388

LAND USE 445-7205

ROAD EVALUATION REPORT INSTRUCTIONS

PURPOSE: The *Road Evaluation Report* is intended as a way for an applicant to document the condition of the access road(s) serving the subject property for cannabis projects that require a Conditional Use Permit (CUP), Special Permit (SP), or Zoning Clearance Certificate (ZCC). This report is not intended to be used for any other type of Planning & Building Department permit application. This will enable Public Works staff to determine if the existing roadway network [excluding on-site driveway(s)] is suitable to accommodate the proposed use on the subject property.

In rural areas, a category 4 road is usually adequate for most uses. If the road is paved and has a centerline stripe it is considered by the Department to be a category 4 road. In urban and suburban areas, the road may also need to accommodate other road users (pedestrians, bicycles, equestrians, etc.). When roads meet or exceed this standard, the roadways can typically accommodate increased traffic. This evaluation is accomplished by the applicant completing Part A of the *Road Evaluation Report*.

When the roadways do not meet a category 4 standard, there is a question that road may not be able to accommodate traffic from the proposed use. The goal is to evaluate roads that do not meet road category 4 standards in order to determine if the roads can accommodate increased traffic. This evaluation is accomplished by the applicants engineer completing Part B of the *Road Evaluation Report*.

In lieu of constructing road improvements to meet a category 4 road standard, the Department may approve a *Neighborhood Traffic Management Plan*. A neighborhood traffic management plan may include (but is not limited) the following elements: restricting the times that project traffic will use the road to off-peak hours; combining trips to reduce the volume of project traffic; carpooling to reduce the volume of project traffic; the use of signs and CB radios to coordinate traffic using the road(s); etc. The Department's criteria for approving a *Neighborhood Traffic Management Plan* is based upon site specific conditions; sound engineering judgment; the proposed ADT and DHV of the roads; the need to accommodate other road users (pedestrians, bicycles, equestrians, and other cannabis projects using the road, etc.); and the frequency and quantity of traffic associated with the proposed use. The applicant's Civil Engineer can address this in Part B of the *Road Evaluation Report*.

There may be other cannabis projects that use the same access road(s) as your project. Part B of the *Road Evaluation Report* needs to address the cumulative impacts from your project and all other cannabis projects that will also use the same road(s). There may be benefits of applicants collectively working together with one engineer to complete the *Road Evaluation Reports* for all of the projects.

(continued on next page)

REFERENCES:

- Humboldt County *Road Design Manual*, Chapter 7, Design Standards for Roadway Categories.
- American Association of State Highway and Transportation Officials (AASHTO) *Guidelines for Geometric Design of Very Low-Volume Local Roads (ADT ≤400)*.
- American Association of State Highway and Transportation Officials (AASHTO) *A Policy on Geometric Design of Highways and Streets* (AKA "Green Book")
- Institute of Transportation Engineers (ITE) *Trip Generation*

INSTRUCTIONS: The *Road Evaluation Report* consists of two parts. The first part (Part A) may be completed by the applicant. If the second part (Part B) is needed, it must be completed by a Civil Engineer licensed by the State of California. The .pdf version of this document provides fields that can be filled in.

A separate *Road Evaluation Report* is required for each road. **Save Time: before completing these forms consult with the Land Use Division at 707.445.7205 to make sure you are evaluating all of the necessary roads for your project; that other cannabis projects in the vicinity have been included; and to make sure that you understand what is needed.**

Special instructions to the applicant's Civil Engineer in completing Part B:

- Engineer will need to contact the Department for a list of other cannabis projects that may be using all or some of the same roads in the roadway network.
- Engineer will need to determine which of these projects utilize the roads within the same roadway network by personally reviewing the cannabis project applications at the Planning & Building Department. Many of the cannabis project applications are incomplete; therefore the engineer may need to directly contact other applicants to determine how these other cannabis projects will utilize the roads in question.
- Engineer may propose a master plan in which any required roadway improvements are incrementally divided among several cannabis projects. However, the master plan must be designed so that improvements to the road(s) will be adequate when constructed incrementally.

// END //

**HUMBOLDT COUNTY DEPARTMENT OF PUBLIC WORKS
ROAD EVALUATION REPORT**

PART A: *Part A may be completed by the applicant*

Applicant Name: _____ APN: _____

Planning & Building Department Case/File No.: _____

Road Name: _____ (complete a separate form for each road)

From Road (Cross street): _____

To Road (Cross street): _____

Length of road segment: _____ miles Date Inspected: _____

Road is maintained by: ☐ County ☐ Other _____
(State, Forest Service, National Park, State Park, BLM, Private, Tribal, etc)

Check one of the following:

Box 1 ☐ The entire road segment is developed to Category 4 road standards (20 feet wide) or better. If checked, then the road is adequate for the proposed use without further review by the applicant.

Box 2 ☐ The entire road segment is developed to the equivalent of a road category 4 standard. If checked, then the road is adequate for the proposed use without further review by the applicant.

An equivalent road category 4 standard is defined as a roadway that is generally 20 feet in width, but has pinch points which narrow the road. Pinch points include, but are not limited to, one-lane bridges, trees, large rock outcroppings, culverts, etc. Pinch points must provide visibility where a driver can see oncoming vehicles through the pinch point which allows the oncoming vehicle to stop and wait in a 20 foot wide section of the road for the other vehicle to pass.

Box 3 ☐ The entire road segment is not developed to the equivalent of road category 4 or better. The road may or may not be able to accommodate the proposed use and further evaluation is necessary. Part B is to be completed by a Civil Engineer licensed by the State of California.

The statements in PART A are true and correct and have been made by me after personally inspecting and measuring the road. A map showing the location and limits of the road being evaluated in PART A is attached.

Signature

Date

Name Printed

Important: Read the instructions before using this form. If you have questions, please call the Dept. of Public Works Land Use Division at 707.445.7205.

PART B: Only complete Part B if Box 3 is checked in Part A. Part B is to be completed by a Civil Engineer licensed by the State of California. Complete a separate form for each road.

Road Name: _____ Date Inspected: _____ APN: _____
From Road: _____ (Post Mile _____) Planning & Building
To Road: _____ (Post Mile _____) Department Case/File No.: _____

1. What is the Average Daily Traffic (ADT) of the road (including other known cannabis projects)?

Number of other known cannabis projects included in ADT calculations: _____

(Contact the Planning & Building Department for information on other nearby projects.) _____

ADT: _____ Date(s) measured: _____

Method used to measure ADT: ☐ Counters ☐ Estimated using ITE Trip Generation Book

Is the ADT of the road less than 400? ☐ Yes ☐ No

If **YES**, then the road is considered very low volume and shall comply with the design standards outlined in the American Association of State Highway and Transportation Officials (AASHTO) *Guidelines for Geometric Design of Very Low-Volume Local Roads (ADT ≤ 400)*. Complete sections 2 and 3 below.

If **NO**, then the road shall be reviewed per the applicable policies for the design of local roads and streets presented in AASHTO *A Policy on Geometric Design of Highways and Streets*, commonly known as the "Green Book". Complete section 3 below.

2. Identify site specific safety problems with the road that include, but are not limited to: (Refer to Chapter 3 in AASHTO *Guidelines for Geometric Design of Very Low-Volume Local Roads (ADT ≤ 400)* for guidance.)

A. Pattern of curve related crashes.

Check one: ☐ No. ☐ Yes, see attached sheet for Post Mile (PM) locations.

B. Physical evidence of curve problems such as skid marks, scarred trees, or scarred utility poles

Check one: ☐ No. ☐ Yes, see attached sheet for PM locations.

C. Substantial edge rutting or encroachment.

Check one: ☐ No. ☐ Yes, see attached sheet for PM locations.

D. History of complaints from residents or law enforcement.

Check one: ☐ No. ☐ Yes (☐ check if written documentation is attached)

E. Measured or known speed substantially higher than the design speed of the road (20+ MPH higher)

Check one: ☐ No. ☐ Yes.

F. Need for turn-outs.

Check one: ☐ No. ☐ Yes, see attached sheet for PM locations.

3. Conclusions/Recommendations per AASHTO. Check one:

☐ The roadway can accommodate the cumulative increased traffic from this project and all known cannabis projects identified above.

☐ The roadway can accommodate the cumulative increased traffic from this project and all known cannabis projects identified above, if the recommendations on the attached report are done. (☐ check if a *Neighborhood Traffic Management Plan* is also required and is attached.)

☐ The roadway cannot accommodate increased traffic from the proposed use. It is not possible to address increased traffic.

A map showing the location and limits of the road being evaluated in PART B is attached. The statements in PART B are true and correct and have been made by me after personally evaluating the road.

Signature of Civil Engineer _____

Date _____

Important: Read the instructions before using this form. If you have questions, please call the Dept. of Public Works Land Use Division at 707.445.7205.



Division of Environmental Health

100 H Street - Suite 100 - Eureka, CA 95501

Phone: 707-445-6215 - Toll Free: 800-963-9241

Fax: 707-441-5699

envhealth@co.humboldt.ca.us

Attachment for Commercial Medical Marijuana (CMM) Clearances/Permits

Applications for CMM Clearances and/or Permits are reviewed by the Division of Environmental Health (DEH) for compliance with regulations intended to protect public health and the environment. Individuals preparing a CMM Permit Application are encouraged to provide information addressing the items listed below, as applicable, to assist DEH with a timely review. If the requested information is already provided in a complete operations manual submitted to the Planning Division, provide the page and section numbers where it is located.

Name of Business: _____

Primary Contact Person: _____

Site Address: _____

Phone: _____

APN: _____

Email: _____

General Project Description (cultivation, processing, manufacturing; seasonal vs year round etc.)

Wastewater (page ____ section ____)

- Connected to public sewer _____ Onsite waste water system _____
- Number of Employees: average _____ peak operations: _____
- Hours of Operation/shifts per day: average _____ peak operations: _____
- Additional flow from processing: _____ GPD. Description of effluent _____
- Describe the proposed and existing wastewater generating structures and method(s) of effluent disposal.

Water Source (page ____ section ____)

- Describe and show the water source(s) available on the property and what they serve.
 - ☐ Public Water System
 - ☐ Well Permit Number(s): _____
 - ☐ Unpermitted Well
 - ☐ No Existing Water Source
 - ☐ Spring
 - ☐ Approved Surface Water/Description _____
 - ☐ Unapproved Surface Water/Description _____
 - ☐ Other: _____
- Describe the approximate daily water demand for the current and projected uses on the property and method used to calculate demand: _____

Consumer Protection (page ____ section ____)

- List/Describe any food production or service: _____
- Describe and show on site plan, any existing or proposed kitchen infrastructure: _____

Note: DEH does not currently regulate edible cannabis products. Any other food production may require a Plan Check and permitting.

Hazardous Materials (page ____ section ____)

- List/describe production/cultivation machinery (e.g. generator, tractor, OHV, trimmer, heaters etc.): _____

- Equipment Maintenance/Service (e.g., changing oil, antifreeze, etc.): Onsite or Offsite
- List/describe fuel/oil(s) used or produced onsite (e.g. gasoline, diesel, propane, other?); Provide amounts and storage method(s): _____

- List/describe all compressed gases, cleaners, solvents and sanitizers (including, but not limited to, household chemicals, bleach and alcohol). Provide amounts and storage method(s): _____

- List/describe fertilizers, soil amendments and biocides (including organic ones). Provide amounts and storage method/area(s): _____

*Attach Safety Data Sheets (SDS)

Solid Waste/Recycling (page ____ section ____)

- List/describe the different anticipated solid waste/recycling, composting products and anticipated amounts: _____

- Describe, and show on the site plan, the designated area for storage of recycling and solid waste (containers stored outside must be covered): _____

- Describe waste removal plan including frequency and destination
 - Garbage (1x/week) _____
 - Recycling(x/month) _____ (avoid nuisances including odors and vermin.)
 - Hauling via Garbage/Recycling Service: _____ or Self Haul _____
- Preferred permitted solid waste/recycling facility: _____

Note: Spent growth medium with no further agricultural use is considered solid waste. It must be stored under cover until it can be hauled to a waste facility.