



Providing Professional Forestry Services

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August 16, 2019

Humboldt County Planning and Building Department
Cannabis Services Division
3015 H St
Eureka, CA 95501



Re: Permit Application No. 11460, APN: 221-111-027

Greetings County Cannabis Planner,

In a letter from Cannabis Services at the Humboldt County Building and Planning Department dated July 3, 2019, landowner Humboldt Natural Collective at APN 221-111-027 was requested to have a Registered Professional Forester (RPF) prepare a timberland Conversion Evaluation report due to a referral from CalFire. Upon mapping this parcel, viewing the topography and analyzing historic imagery dating back to 1963 - it appears that the site is situated in a historic meadow on a ridgeline and that the timberline footprint has not changed in relation to cannabis cultivation. I spoke with the landowner on August 14, 2019 who verified that no timberland had been cut. After administrative office review, it is the opinion of the RPF that no timberland conversion, as defined by 4526 of the Public Resource Code, occurred on this parcel and therefore no timberland Conversion Evaluation report is warranted.

Thank you for your attention to this matter.

Sincerely,

BLAIR FORESTRY CONSULTING


Thomas F. Blair, RPF 2607

Attachments: Letter from Humboldt County dated July 3, 2019; Imagery 1963, 2005, 2018



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 3, 2019

Humboldt Natural Collective
Patrick Weber
21116 Mill Ridge Dr.
Santa Clara, CA 91350

RE: Permit Application No. 11460

APN: 221-111-027

Greetings Humboldt Natural Collective,

Thank you for your submittal of the above referenced application for a commercial cannabis permit for 9,850 square feet of existing outdoor cannabis cultivation. 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 that we need to continue processing this permit application:

- 1) Please submit a notarized lease or other form of notarized consent from the landowner, Patrick Weber, for the applicant, Humboldt Natural Collective, MBC, to cultivate cannabis on APN 221-111-027.
- 2) Please submit a Road Evaluation for the access route to the parcel using the attached form.
- 3) Per the Tribal Historic Preservation Officer (THPO) of the Bear River Band, please submit a Cultural Resources Study, prepared by a qualified professional archaeologist, for the subject parcel. We cannot make the required findings under CEQA that the project will not harm cultural resources without this document.
- 4) Please submit one of the following:
 - a) A Final Streambed Alteration Agreement issued by CDFW, or
 - b) A letter from CDFW stating that no Streambed Alteration Agreement is required.
- 5) Please submit one of the following pursuant to your Water Board enrollment for waste discharge:
 - a) A Water Resources Protection Plan prepared under the Regional Order, or
 - b) A Site Management Plan prepared under the General Order,
- 6) Referral comments from CalFire state that previous land use activities may have resulted in timber harvest without a permit and harvesting without a plan or license. Please submit one of the following documents:
 - a) A copy of a less-than-3-acre conversion exemption or timberland conversion permit, approved by CalFire, or
 - b) A timber conversion evaluation report prepared by a registered professional forester.
- 7) Please submit a revised Cultivation and Operations Plan or an Addendum to your current Cultivation and Operations Plan that corresponds with the issued Interim Permit for 9,850 square feet of existing outdoor cannabis cultivation. Please ensure that the revisions cover the following items:

- a) Please describe the size of the project as 9,850 square feet of existing outdoor cannabis cultivation. Describe all cultivation areas or structures involved (greenhouses, hoop houses, etc) and provide their dimensions. State if you are using light deprivation. The County considers light deprivation a form of outdoor cultivation so long as no supplemental lighting is involved.
 - b) Please provide a schedule of activities during each month of the growing and harvesting season that corresponds to your permit size and type.
 - c) Please explain how you will meet the water demands of your project during the forbearance period. Currently, your Cultivation and Operations Plan describes a stream-fed pond and an annual water use of 222,720 gallons and does not clearly state how much water storage is available. There must be enough water storage to adhere to the required forbearance period from surface water diversion.
 - d) Please state your water source or stored water designated for fire suppression (recommendation is 2,500 gallons minimum for rural properties).
 - e) Due to the presence of noise-sensitive protected species near the subject parcel, noise produced by generators, fans, and other noise sources will be required to be below 50 decibels at 100 feet away from the noise source. Please revise your description of generator use to reflect a 50-decibel threshold and be sure to describe how the generator will be shielded or otherwise contained to attenuate sound.
 - f) Materials in your file describe onsite relocation that has occurred. Please provide the following information:
 - i. Please describe why onsite relocation was environmentally superior or resulted in an improved environmental baseline.
 - ii. Please provide a brief restoration plan for decommissioned areas on the parcel. Restoration should include, at minimum, removal of all cultivation-related materials, recontouring to natural topography if necessary, and revegetation with native species to ensure soil stability.
- 8) Please note that we are still waiting to hear back from CDFW and BLM regarding your project. Referral comments from these agencies could result in additional requests. We will follow up with these agencies and will let you know as soon as we have this information.

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

CC: Green Road Consulting – Kaylie Saxon

Attachment I – Road Evaluation Report Form

1963 Imagery



APN 221-111-027
2005 Imagery

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22111129

22111126

22111128

22111125

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APN 221-111-027
2018 Imagery

