

Response to Humboldt County Planning Department regarding the modifications to the cultivation site for APN 208-341-005, PLN-12017, 605 Cobb Rd. Bridgeville, Ca.

Prepared by Margro Advisors

We understand and appreciate the County's concern regarding the unpermitted tree removal and grading that occurred following submission of the original cultivation permit application. The applicant acknowledges the importance of adhering to local permitting procedures and is committed to full transparency and restoration. The following explanation outlines the rationale for the changes, associated mitigation efforts, and planned restoration.

1. Operational Efficiency and Site Constraints

The original configuration proved to be less viable due to site-specific challenges. Creating the greenhouses allowed for more efficient operations, safer working conditions, and improved site sustainability. The revised infrastructure layout improves accessibility and reduces risks related to erosion and runoff through better spacing and orientation.

2. Environmental Considerations

Though the disturbed area expanded, all structures remain outside environmentally sensitive areas and maintain the required setbacks. Additionally, erosion control measures such as mulching, straw wattles, and drainage structures have been implemented to stabilize soils and minimize sediment transport.

3. No Increase in Cultivation Footprint or Intensity

The cultivation area remains within the approved square footage and type. The relocation did not result in any increase in cultivation intensity, nor was there expansion into areas not previously reviewed for cannabis activity.

4. Commitment to Restoration and Compliance

The site plans have been updated to reflect the current layout. We are also committed to restoring any areas unnecessarily disturbed during construction that fall outside the operational footprint, as directed by County staff or relevant resource agencies.

The site has transitioned from using individual pots to in-ground raised beds as part of an effort to improve soil health, reduce water use, and limit nutrient runoff. Raised beds promote more efficient water retention, deeper root development, and significantly reduce the risk of nutrient leaching into adjacent areas. This change reflects a broader commitment to environmentally responsible cultivation practices and long-term site sustainability.

Closed-loop application ensures that water and nutrients are precisely delivered to and retained within the root zones. This system minimizes overspray and runoff by using drip irrigation, moisture monitoring, and organic raised beds that absorb inputs efficiently. The design prevents excess nutrients from leaching into the environment, maintaining soil health and protecting local waterways.

We respectfully request that the County consider this modification under the context of operational necessity and environmental stewardship, and we welcome any further input needed to move forward in compliance with the County's permitting standards.

Environmental Benefits of Switching from Pots to Raised Beds

1. Improved Water Use Efficiency

- Raised beds retain moisture better than pots, which dry out faster due to their smaller soil volume and more exposed surface area.
- This means less frequent watering is needed, reducing overall water use.

2. Better Water Retention & Infiltration

- Raised beds allow for deeper water infiltration and improved soil moisture holding capacity.
- This can help mitigate runoff and erosion, particularly in hilly or sloped terrain common in Humboldt.

3. Reduced Nutrient Runoff

- Unlike pots, which often require frequent fertilization and can leach nutrients more readily, raised beds allow for more controlled nutrient cycling.
- When designed with proper soil structure and organic matter, raised beds can hold nutrients more effectively, reducing the risk of them entering nearby watercourses.

4. Soil Health and Sustainability

- Raised beds encourage long-term soil building, microbial health, and biodiversity — compared to pots, which often involve disposable media that's replaced each year.

5. Reduced Waste & Site Impact

- Over time, raised beds mean less plastic (from pots), fewer amendments needed, and less physical disturbance from moving soil and containers seasonally.

Following a review of the Humboldt County Planning Department's concerns regarding unpermitted grading and relocation, we offer the above rationale and restoration commitments. While cultivation remains within permitted limits, infrastructure was revised to address site constraints and improve safety and ecological performance. We have implemented erosion control measures, transitioned to raised beds, and updated site plans. The applicant is fully committed to restoring disturbed areas and continuing coordination to ensure full compliance with County standards.