



COUNTY OF HUMBOLDT
PLANNING AND BUILDING DEPARTMENT
CURRENT PLANNING DIVISION

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Hearing Date: November 2, 2017

To: Humboldt County Planning Commission

From: John H. Ford, Director of Planning and Building Department

Subject: **Calisun Farms Conditional Use Permit**
Application Number 11548
Case Numbers CUP 16-286
Assessor's Parcel Numbers (APN) 208-321-007
Bridgeville Area

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Please contact Michelle Nielsen, Senior Planner, at 707-445-7541 or by email at mnielsen@co.humboldt.ca.us if you have any questions about the scheduled item.

AGENDA ITEM TRANSMITTAL

Hearing Date	Subject	Contact
November 2, 2017	Conditional Use Permit	Michelle Nielsen

Project Description: A Conditional Use Permit (CUP) is sought for 24,100 square feet (sf) of existing cannabis cultivation with on-site processing on an approximately 63-acre parcel. Of the total cultivation area, 10,100 sf is in greenhouses, and 14,000 sf is in full sun. Drying and trimming occurs in an existing building onsite. The Applicant is proposing to convert an existing agricultural building to a processing facility where employees will be lodged, have access to a restroom, and a wash station. The Applicant will hire a maximum of seven employees throughout the year. Water for cultivation is currently obtained from a surface diversion on a neighboring property. A well is proposed (permit number 16/17 0409) as an on-site water source to replace the current off-site surface water diversion. The well is scheduled to be installed between August 21 and 25, 2017. Existing water storage capacity totals 83,650 gallons in hard tanks and bladders. Total projected water needs for the cultivation is 75,000 gallons per year. The Applicant is seeking separate permitting for the existing second residence on the property and this residence would be used as housing for 1-2 collective members who would be working on-site during the growing season. Those collective members resident on the site during the growing season would make approximately 25 vehicle trips per season/year to and from the site. A septic system for the residence was installed on July 17, 2017 (permit application number 43988). No artificial light is used in cultivation; electricity for the residence and processing facility is from a generator. The activity is enrolled with the North Coast Regional Water Quality Control Board as a Tier II discharger (WDID# 1B170372CHUM).

Project Location: The project is located in the Bridgeville area, south of State Route 36, approximately 6.5 miles south of the intersection of State Route 36 and the Larabee Buttes BLM access road.

Present Plan Land Use Designations: Agriculture/Grazing (AG), Framework Plan (FRWK), Density: 160 to 20 acres per dwelling unit; Slope Stability: High Instability (3).

Present Zoning: Unclassified (U)

Case Number: CUP16-286

Application Number: 11548

Assessor Parcel Number: 208-321-007

Applicant

Calisun Business Support Services, LLC.
Attn.: Daniel Salazar
728 Fourth St.
Eureka, CA 95501

Owner

John Landry
3362 A St.
Hydesville, CA 95547

Agent

Trinity Valley Consulting Engineers
Attn.: Christian Figueroa
67 Walnut Way
Willow Creek, CA 95573

Environmental Review: CEQA Exemption Sections 15301 (Existing Facilities), and 15304 (Minor Alterations to Land) of the CEQA Guidelines.

State Appeal Status: Project site is not located in the Coastal Zone and is not appealable to the California Coastal Commission

Major Issues: None

CALISUN FARMS, INC.
Case Number CUP16-286
Assessor's Parcel Number 208-321-007

Recommended Commission Action

1. Describe the application as part of the Consent Agenda;
2. Survey the audience for any person who would like to discuss the application;
3. If no one requests discussion, make the following motion to approve the application as part of the consent agenda:

Find the project exempt from environmental review pursuant to Sections 15301 and 15304 of the State CEQA Guidelines, make all of the required findings for approval of the Conditional Use Permit based on evidence in the staff report and any public testimony, and adopt the Resolution approving the proposed Calisun Farms, Inc. Conditional Use Permit subject to the recommended conditions.

Executive Summary

Calisun Business Support Services, LLC. (Calisun) is seeking a CUP for an existing 24,100-square-foot (sf) outdoor commercial medical cannabis cultivation with on-site processing. Existing structures and facilities associated with cultivation and processing include: a primary residence with septic leachfield constructed prior to 2000; an "as built" structure completed in 2010 with septic leachfield constructed in 2017; an agricultural building constructed in 2016; 4 water storage bladders with a total capacity of 70,000 gallons; 4 water storage tanks with a total capacity of 9,000 gallons; 3 nutrient mixing tanks with a total capacity of 4,100 gallons; 9 greenhouses totaling 10,100 sf; 12 outdoor cultivation areas totaling 14,000 sf; a composting toilet latrine serving the cultivation areas; a generator and fuel containment area. The existing water source for the property is 2 surface water diversions on a neighboring parcel by long-standing verbal agreement between the property owners. Calisun proposes to install a well as a water source and has filed a well permit application (16/17-0409). Installation of the well is scheduled for August 21-25, 2017. Calisun has applied for a septic permit (application number 43988) to use the "as-built" structure as housing for 1-2 collective members who will reside on the site during the growing season.

The 63-acre property used for medical cultivation activity is zoned Unclassified (U). The CMMLUO identified U-zoned parcels 5 acres or larger as sites where existing cannabis cultivation activities could be allowed. Cultivation of between 10,000 sf and 1 acre is allowed subject to the issuance of a CUP. A CUP is a discretionary permit meaning that, to approve the requested cultivation area, the Planning Commission must consider whether the findings required for permit approval can be met for the described project. Calisun submitted a Commercial Cannabis Activity Registration form on August 16, 2016, and an application for a Use Permit on November 29, 2016.

Operations

Calisun will conduct cultivation activities during the natural growing season with no artificial light. Greenhouses will be used only to apply light deprivation treatment to induce flowering in plants intended for harvest in August. Plants grown in full sun will be harvested in October. Harvested plants will be dried indoors in the existing agricultural building and stored in plastic bins until trimming and processing.

The property is accessed by a single private road with three locked gates. Buildings are locked and monitored with security cameras when the site is unoccupied.

Access & Parking

Travel east on State Route 36 from Bridgeville to mile marker 32.3; turn right on Larabee Buttes Road and travel 2.7 miles; take left-hand fork and continue 2.15 miles to another fork; take right-hand fork and travel 1.15 mile to property entrance; turn right onto the property and continue 0.5 mile to the existing house. The project site is approximately six miles from the intersection with Highway 36. Larabee Buttes Road traverses through some lands owned by the Bureau of Land Management (BLM) and many privately held properties. The project was referred to BLM, and while this agency did not make a recommendation, it commented:

Many roads maintained by BLM cross through private property to access public lands. Over the years, the maintenance burden on these roads has increased due to increased vehicle use by heavier vehicles and trailers from cannabis cultivation operations. This increased use has resulted in rutting, drainage issues and general degradation of the road surface...We would suggest the county develop shared road maintenance responsibilities on roads used by private entities so that the public can continue to access public lands on safe roads and road-related impacts to natural resources are reduced.

The applicant submitted a road evaluation and self-certified that the access road, Larabee Buttes Road, is developed to the equivalent of a road category 4 standard.

Water Sources & On-site Wastewater System

The current water source is two surface diversions from a neighboring property (APN 208-321-005), one used for the residence and gardening, and one used for cannabis cultivation. Calisun filed an application for well construction in October 2016 (DEH permit #16/17-0409) and the well is scheduled for completion by August 2017. Water storage capacity on the property currently consists of 4 storage bladders totaling 70,000 gallons, 2 hard tanks totaling 3,500 gallons, and 5 nutrient mixing tanks totaling 10,125 gallons, for a total storage capacity of 83,625 gallons. Following completion of the proposed well, Calisun would decommission the storage bladders or use them as emergency storage for wildfires. Current storage capacity is sufficient to meet forbearance period water needs; estimated annual water use for the property is 53,902 gallons.

Irrigation in the cultivation areas is by automated drip with no runoff. Exposed soil in cultivation areas will be mulched, and fabric pots will be covered with straw or cardboard to reduce water loss. The existing cannabis cultivation operation is enrolled with the North Coast Regional Water Quality Control Board as a Tier II discharger (WDID# 1B170372CHUM). Used potting soil will be stockpiled between growing seasons under tarps and surrounded with straw bales to prevent erosion, then amended and reused in subsequent growing seasons. Soil in raised beds will be seeded with a green cover after harvest to prevent erosion between cultivation seasons.

The existing residence and the existing "as-built" building have septic systems and leach fields associated with them. The applicant installed a septic system at the residence (application number 43988) in July 2017. There is also a latrine with a composting toilet. The project's conditions of approval state that the existing second residence is not authorized for occupancy by employees or collective members until the applicant secures all necessary State and/or local approvals for this residential structure.

Lighting & Electrical Service

The property is not served by any municipal utilities. Lighting in all cultivation areas, including greenhouses, will be natural. Electricity for fans and humidity controls in the processing building, and for domestic uses in the residence is from generators. Calisun uses 3 generators in semi-

permanent locations with drip protection pans and straw bale noise walls. Gasoline for generators is stored in a 240-gallon tank with 264-gallon capacity secondary containment.

Staff Recommendation

Based on the on-site inspection, a review of Planning Division reference sources, and comments from all involved referral agencies, planning staff believes that the applicant has submitted evidence in support of making all of the required findings for approving the CUP.

ALTERNATIVES: The Planning Commission could elect not to approve the project, to require the applicant to submit further evidence, or modify the project. These alternatives could be implemented if the Commission is unable to make all of the required findings. Planning Division staff has stated that the required findings in support of the proposal have been made. Consequently, Planning staff does not recommend further consideration of the alternatives.

**RESOLUTION OF THE PLANNING COMMISSION
OF THE COUNTY OF HUMBOLDT
Resolution Number 17-**

**Case Number: CUP 16-286
Assessor's Parcel Number: 208-321-007**

Makes the required findings for certifying compliance with the California Environmental Quality Act and conditionally approves Calisun Farms, Inc. Conditional Use Permit request.

WHEREAS, Calisun Farms, Inc. submitted an application and evidence in support of approving the Conditional Use Permit to permit an existing 24,100 square-foot outdoor cultivation area with onsite processing; and

WHEREAS, the County Planning Division has reviewed the submitted application and supporting substantial evidence and has referred the application and evidence to involved reviewing agencies for site inspections, comments and recommendations; and

WHEREAS, the project is exempt from environmental review per Sections 15301 (Existing Facilities) and 15304 (Minor Alterations to Land) of the State CEQA Guidelines; and

WHEREAS, Attachment 2 in the Planning Division staff report includes substantial evidence in support of making all of the required findings for approving the proposed Conditional Use Permit (Case Number CUP 16-286); and

WHEREAS, a public hearing was held on the matter before the Humboldt County Planning Commission on November 2, 2017

NOW, THEREFORE, be it resolved, determined, and ordered by the Humboldt County Planning Commission that:

1. The project is exempt from environmental review; and
2. The findings in Attachment 2 of the Planning Commission staff report for Case Number CUP 16-286 support approval of the project based on the submitted substantial evidence; and
3. Approves the Conditional Use Permit Case Number CUP-16-286 as recommended and conditioned in Attachment 1 for Case Number CUP-16-632.

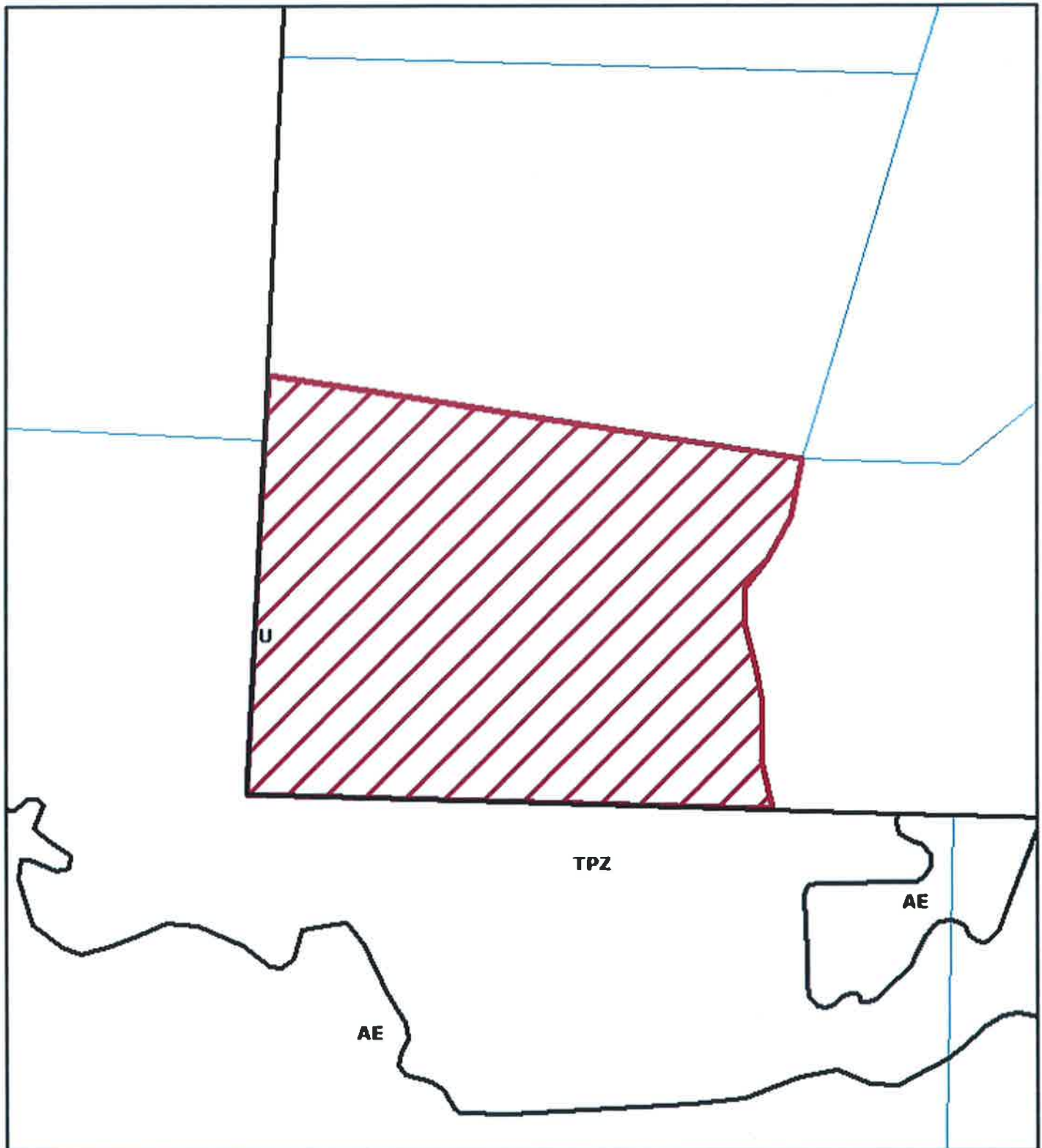
Adopted after review and consideration of all the evidence on November 2, 2017.

The motion was made by COMMISSIONER _____ and second by COMMISSIONER _____:

AYES: COMMISSIONERS:
NOES: COMMISSIONERS:
ABSENT: COMMISSIONERS:
ABSTAIN: COMMISSIONERS:
DECISION:

I, John 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.

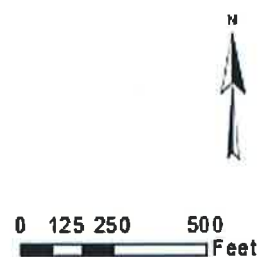
John Ford, Director
Planning and Building Department
County of Humboldt

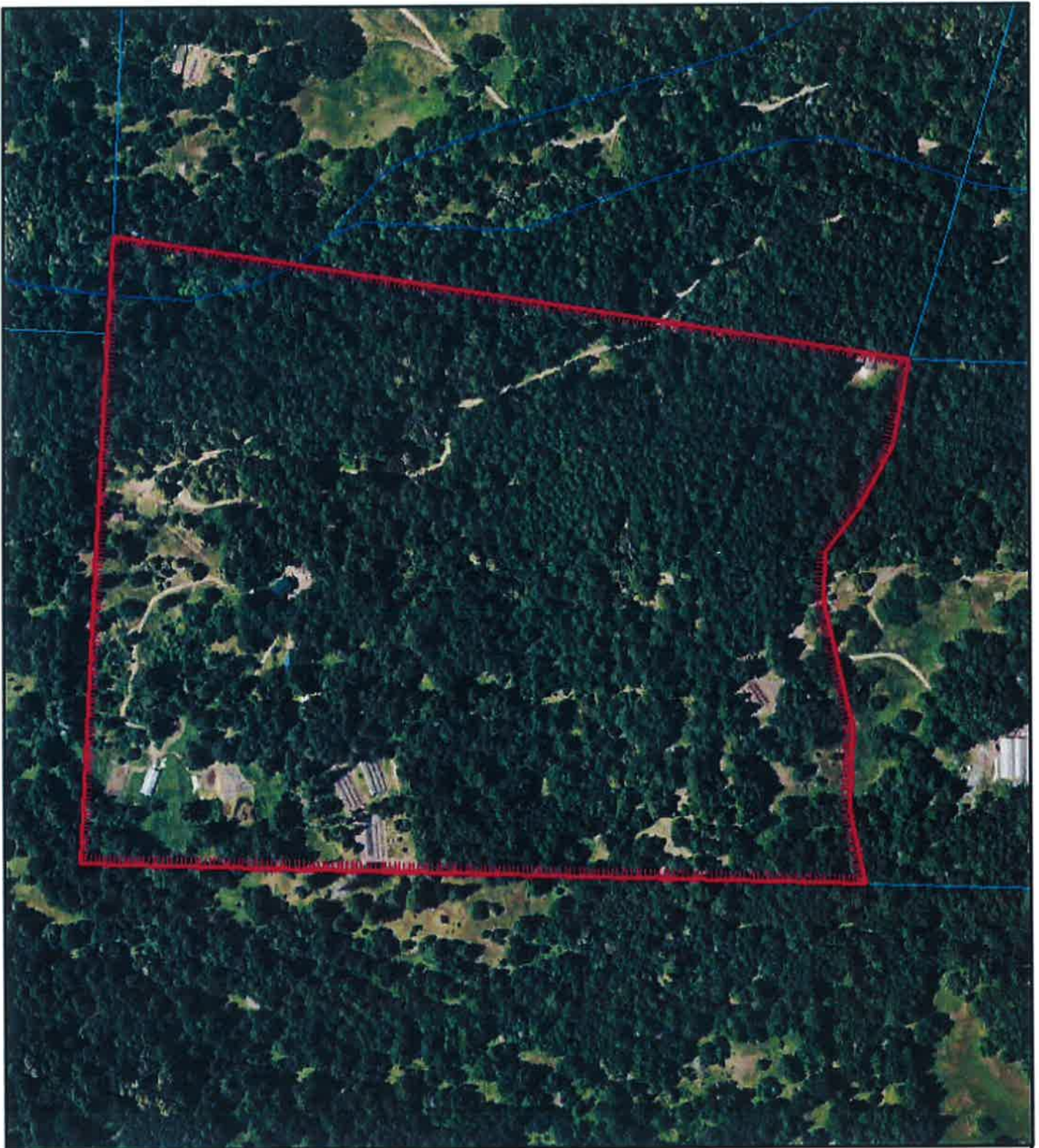


Project Area = 

**ZONING MAP
PROPOSED CALISUN FARMS, INC.
BRIDGEVILLE AREA
CUP-16-286
APN: 208-321-007
T01N R04E S32 HB&M (LARABEE VALLEY)**

This map is intended for display purposes and should not be used for precise measurement or navigation. Data has not been completely checked for accuracy.





**AERIAL MAP
PROPOSED CALISUN FARMS, INC.
BRIDGEVILLE AREA
CUP-16-286**

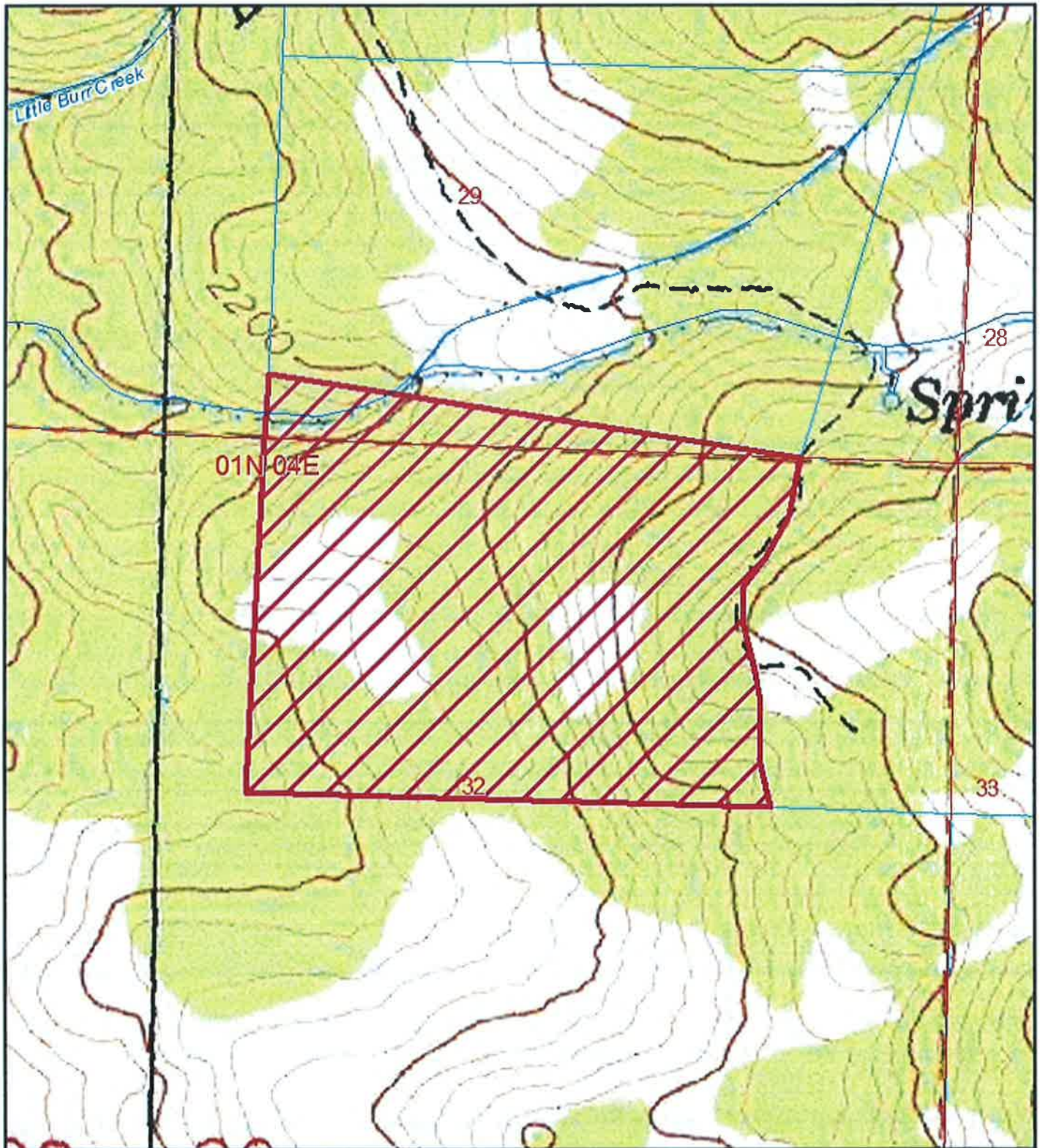
**APN: 208-321-007
T01N R04E S32 HB&M (LARABEE VALLEY)**

Project Area = 

This map is intended for display purposes and should not be used for precise measurement or navigation. Data has not been completely checked for accuracy.



0 100 200 400
Feet



**TOPO MAP
PROPOSED CALISUN FARMS, INC.
BRIDGEVILLE AREA
CUP-16-286**

**APN: 208-321-007
T01N R04E S32 HB&M (LARABEE VALLEY)**

Project Area = 

This map is intended for display purposes and should not be used for precise measurement or navigation. Data has not been completely checked for accuracy.



0 125 250 500
Feet

ATTACHMENT 1
RECOMMENDED CONDITIONS OF APPROVAL

APPROVAL OF THE CONDITIONAL USE PERMIT IS CONDITIONED ON THE FOLLOWING TERMS AND REQUIREMENTS WHICH MUST BE SATISFIED BEFORE THE PROVISIONAL CANNABIS CULTIVATION PERMIT CAN BE FINALIZED.

1. Prior to initiating any commercial cannabis cultivation or associated activities in 2018, the applicant shall submit a copy of the well log and written verification that the well has been installed and meets the requirements of the Division of Environmental Health (DEH) to the Humboldt County Planning and Building Department. The use of surface water diversion for irrigation water is not authorized or permitted.
2. Within 60 days of project approval, the applicant shall execute a Compliance Agreement with the Humboldt County Planning Department detailing all necessary permits and infrastructure improvements described under Conditions of Approval #3 – 15. The agreement shall provide a timeline for completing all outstanding items. All activities detailed under 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.
3. Within 30 days of project approval, the applicant shall obtain a Business License from the Humboldt County Tax Collector.
4. If the well that supplies irrigation water is hydrologically connected to surface water, the applicant shall secure a Streambed Alteration Agreement from the Department of Fish and Wildlife, and shall agree to and implement forbearance in accordance with Humboldt County Code Section 314-55.4.11(l).
5. The applicant shall submit at least one legible copy of the Water Resources Protection Plan to Planning. The applicant shall implement all corrective actions detailed within the Water Resource Protection Plan developed for the parcel, prepared pursuant to Tier 2 enrollment under the North Coast Regional Water Quality Control Board Cannabis Waste Discharge Regulatory Program. A letter or similar communication from the RWQCB verifying that all of their requirements have been met will satisfy this condition.
6. The applicant shall secure permits for all unpermitted grading and structures related to the cannabis cultivation and other commercial cannabis activity. The plans submitted for building permit approval shall be consistent with the project description and approved project site plan. A letter or similar communication from the Building Division verifying that all structures related to the cannabis cultivation are permitted will satisfy this condition.
7. The approved building plans shall meet all applicable fire codes, including fire suppression infrastructure requirements deemed necessary for the project by the Building Inspection Division. Sign off on the Occupancy Permit by the Building Division shall satisfy this requirement.
8. Where generators are used the applicant shall provide a noise pollution plan demonstrating that the proposed generator would not deliver noise pollution, which may affect fish and/or wildlife directly, or from a distance. To show conformance with Section 314-55.4.11.o), where generator use occurs in the vicinity of Marbled Murrelet or Spotted Owl species, the plan shall be evaluated in consultation with the Department of Fish and Wildlife. Conformance will be evaluated using auditory disturbance guidance prepared by the United States Fish and Wildlife Service. Should the applicant proposed to achieve noise attenuation by placing the generators inside a building(s), the applicant shall secure a building permit prior to construction.

9. The existing second residence shall not be inhabited by employees or members of the collective until all necessary local and/or State permits are secured.
10. The applicant shall secure the approval of the Division of Environmental Health and the Regional Water Quality Control Board for the on-site sewage disposal system prior to the issuance of the building permit. A letter from those agencies indicating approval has been issued will satisfy this condition.
11. The applicant 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 in order to keep the permit valid.
12. The applicant shall execute and file with the Planning Department 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 Division.
13. The applicant shall provide the California Department of Fish and Wildlife with all requested information regarding calculations of forbearance period water needs and water storage capacity.
14. For the cultivation area identified as the Site 2 on the Project Site Plan, the applicant shall provide a copy of a less-than-3-acre conversion exemption or timberland conversion permit, approved by the California Department of Forestry and Fire Protection (CAL-FIRE). Alternately, if the landowner has not completed a civil or criminal process and/or entered into a negotiated settlement with CAL-FIRE, the applicant shall secure the services of a registered professional forester (RPF) to evaluate site conditions and conversion history for the property and provide a written report to the Planning Division containing the RPF's recommendation as to remedial actions necessary to bring the conversion area into compliance with provisions of the Forest Practices Act. The Planning Division shall provide CAL-FIRE written Notice of Availability of the RPF's report. If CAL-FIRE takes no action within ten (10) days of the notice of availability, the report recommendations shall become final and shall be implemented by the applicant. If CAL-FIRE makes additional recommendations, these shall also be completed to the satisfaction of CAL-FIRE. A letter from the RPF, and written confirmation from CAL-FIRE (if additional requirements are imposed), verifying that all their requirements have been met will satisfy this condition.
15. Prior to initiation of commercial cannabis activity in 2018 the Zone 2 Cultivation Site burlap pots identified in the June 3, 2017 RWQCB Report as being approximately 20 feet from a Class III stream, the applicant shall submit written verification from the RWQCB that an enhanced, reduced, or modified watercourse or wetland setback has been agreed upon by the operator and the RWQCB under enrollment pursuant to NCRWQCB Order No. 2015-0023 and/or prepare a Water Resources Protection Plan. Alternately, the applicant shall secure a modification of this Conditional Use Permit to authorize relocation of this cultivation.
16. A review fee for Conformance with Conditions as set forth in the schedule of fees and charges as adopted by ordinance of the Humboldt County Board of Supervisors (currently \$125.00) shall be paid to the Humboldt County Planning Division, 3015 "H" Street, Eureka. This fee is a deposit, and if actual review costs exceed this amount, additional fees will be billed at the County's current burdened hourly rate.
17. The applicant is required to pay for permit processing on a time and material basis as set forth in the schedule of fees and charges as adopted by ordinance of the Humboldt County Board of Supervisors. The Department will provide a bill to the applicant after the decision. Any and all outstanding Planning fees to cover the processing of the application to decision by the

Hearing Officer shall be paid to the Humboldt County Planning Division, 3015 "H" Street, Eureka.

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

1. All components of project shall be developed, operated, and maintained in conformance with the Project Description, the approved Site Plan, the Plan of Operations, 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.
2. If offsite processing is chosen to be the preferred method of processing, then this permit shall be modified to identify the offsite licensed facility.
3. Cannabis cultivation and other commercial cannabis activity shall be conducted in compliance with all laws and regulations as set forth in the CMMLUO, as applicable to the permit type.
4. If operating pursuant to a written approved compliance agreement, then permittee shall abate or cure violations at the earliest feasible date, but in no event 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 & Building Department within one (1) year of issuance of the provisional clearance or permit. If good faith effort towards compliance can be shown within the two years following the issuance of the provisional clearance or permit, the Planning Department may, at the discretion of the Director, provide for extensions of the provisional permit to allow for additional time to meet the outstanding requirements.
5. Possession of a current, valid required license, or licenses, issued by any agency of the State of California in accordance with the MMRSA, and regulations promulgated thereunder, as soon as such licenses become available.
6. 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.
7. 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, Public Park, or Tribal Cultural Resources, except where a reduction to this setback has been approved pursuant to Section 55.4.11(d).
8. Maintain enrollment in Tier 1, 2 or 3, certification with the North Coast Regional Water Quality Control Board (NCRWQCB) Order No. 2015-0023, if applicable, or any substantially equivalent rule that may be subsequently adopted by the County of Humboldt or other responsible agency.
9. Comply with the terms of any applicable Streambed Alteration (1600) Permit obtained from the California Department of Fish & Wildlife.
10. 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.

11. 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 – Friday, 9:00 am – 5:00 pm, excluding holidays).
12. Refrain from the improper storage or use of any fuels, fertilizer, pesticide, fungicide, rodenticide, or herbicide.
13. Pay all applicable application and annual inspection fees.
14. Where surface water diversion provides any part of the water supply for irrigation of cannabis cultivation, permittee shall either: 1) forebear from any such diversion during the period from May 15th to October 31st of each year and establish on-site water storage for retention of wet season flows sufficient to provide adequate irrigation water for the size of the area to be cultivated, or 2) comply with the approved water management plan prepared by a qualified person such as a licensed engineer, hydrologist, or similar qualified professional, that establishes minimum water storage and forbearance period, if required, based upon local site conditions, or 3) adhere to the RWQCB approved Water Resources Protection Plan or other clearance issued by the agency. If the method of compliance changes during the term of the Conditional Use Permits, permittee shall notify the Planning and Building Department and furnish appropriate documentation of compliance with this standard.
15. At least one water meter shall be installed on the water line providing irrigation flow to the cultivation site. The water meter shall have the capacity to measure at least 100,000 gallons of flow before resetting. The water meter shall be used to measure the amount of water provided to the cultivation area during the forbearance period. The meter shall be installed at a point on the water line that provides an accurate measurement of the water used for irrigation. Household water use at the caretaker's residence shall be separately metered if required.
16. The noise produced by a generator used for cannabis drying, curing, and processing shall not be audible by humans at neighboring residences. The decibel level for generators measured at the property line shall be no more than 60 decibels. Where applicable, sound levels must also show that they will not result in the harassment of Marbled Murrelet or Spotted Owl species. Conformance will be evaluated using current auditory disturbance guidance prepared by the United State Fish and Wildlife Service, and further consultation where necessary. Under these guidelines, generator noise may not exceed 50dB as measured at 100 feet from the generator or at the edge of the nearest Marbled Murrelet or Spotted Owl habitat, whichever is closer.
17. Storage of Fuel - Fuel shall be stored and handled in compliance with applicable state and local laws and regulations, including the County of Humboldt's CUPA program, and in such a way that no spillage occurs.

Performance Standards for Cultivation and Processing Operations

Pursuant to the MMRSA, Health and Safety Code section 19322(a)(9), an applicant seeking a cultivation license shall "provide a statement declaring the applicant is an 'agricultural employer,' as defined in the Alatorre-Zenovich-Dunlap-Berman Agricultural Labor Relations Act of 1975 (Part 3.5 commencing with Section 1140) of Division 2 of the Labor Code), to the extent not prohibited by law."

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, California Agricultural Labor Relations Act, and the Humboldt County Code (including the Building Code):

Cultivators engaged in processing shall comply with the following Processing Practices:

- I. Processing operations must be maintained in a clean and sanitary condition including all work surfaces and equipment.
- II. Processing operations must implement protocols which prevent processing contamination and mold and mildew growth on cannabis.
- III. Employees handling cannabis in processing operations must have access to facemasks and gloves in good operable condition as applicable to their job function.
- IV. Employees must wash hands sufficiently when handling cannabis or use gloves.

All persons hiring employees to engage in commercial cannabis cultivation and processing shall comply with the following Employee Safety Practices:

- i. 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.
- ii. Cultivation operations and processing operations must visibly post and maintain an emergency contact list which includes at a minimum:
 - 8) Operation manager contacts;
 - 9) Emergency responder contacts;
 - 10) Poison control contacts.
- iii. 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.
- iv. On site-housing provided to employees shall comply with all applicable federal, state, and local laws and regulations.

All cultivators shall comply with the approved Processing Plan as to the following:

- i. Processing Practices.
- ii. Location where processing will occur.
- iii. Number of employees, if any.
- iv. Employee Safety Practices.
- v. Toilet and handwashing facilities.
- vi. Plumbing and/or septic system and whether or not the system is capable of handling increased usage.
- vii. Drinking water for employees.

- viii. Plan to minimize impact from increased road use resulting from processing.
- ix. On-site housing, if any.
9. **Permit Duration.** The Permit shall be valid for one year from the effective date of approval, and on the anniversary date of such effective each year thereafter, as long as an annual compliance inspection has been completed and the permit has been found to comply with all conditions of approval. In the event the inspection finds noncompliance, a written notification of shall be provided to the permit holder identifying the items not in compliance and the action the permit holder may take to cure the noncompliance. Failure to cure the noncompliance shall result in termination of the permit. The process of notification, re-inspection and appeal of any noncompliance determination shall be as set forth in sections 55.4.1.2.2 and 55.4.13 of the CMMLUO.
10. **Permit renewals to comply with updated laws and regulations.** Permit renewal per Ongoing Condition of Approval #9 above 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.
11. **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 conformance with conditions review shall accompany the request. The request shall include the following information:
- (1) Identifying information for the new Owner(s) and management as required in an initial permit application;
 - (2) A written acknowledgment by the new Owner in accordance as required for the initial Permit application;
 - (3) The specific date on which the transfer is to occur; and
 - (4) Acknowledgement of full responsibility for complying with the existing Permit; and
 - (5) Execution of an Affidavit of Non-diversion of Medical Cannabis.
12. **Modifications to the Facility.** Prior to making any modifications to a permitted facility, the permittee shall submit to the Planning Director a request for determination of County approvals, together with the appropriate fee. The request shall contain a description sufficiently detailed to allow the Planning Director to determine what permits and other approvals, are needed, and whether a modified Permit is required.
13. **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.
14. All signage shall comply with Section 314-87.2 of the Humboldt County Code.
15. The operation shall participate in the Medical Cannabis Track and Trace Program administered by the Humboldt County Agricultural Commissioner, when available.

Informational Notes:

1. If cultural resources are encountered during ground disturbing 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, as well as the appropriate Tribal Historic Preservation Officer(s), are to be contacted to evaluate the discovery and, in consultation with the applicant and lead agency, develop a treatment plan in any instance where significant impacts cannot be avoided.

The Native American Heritage Commission (NAHC) can provide information regarding the appropriate Tribal point(s) of contact for a specific area; the NAHC can be reached at 916-653-4082. Prehistoric materials may include obsidian or chert flakes, tools, locally darkened midden soils, groundstone 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 NAHC will then be contacted by the Coroner to determine appropriate treatment of the remains pursuant to PRC 5097.98. Violators shall be prosecuted in accordance with PRC Section 5097.99

The applicant is ultimately responsible for ensuring compliance with this condition.

2. The applicant is responsible for receiving all necessary permits and/or approvals from other state and local agencies.
3. This permit approval shall expire and become null and void at the expiration of one (1) year after all appeal periods have lapsed (see "Effective Date"); except where construction under a valid building permit or use in reliance on the permit has commenced prior to such anniversary date. Once initiated, the use is subject to the Permit Duration and Renewal provisions set forth in Condition of Approval # 9 and 10 of the On-Going Requirements /Development Restrictions, above. The period within which construction or use must be initially commenced may be extended as provided by Section 312-11.3 of the Humboldt County Code.
4. The applicant is required to pay for permit processing on a time and material basis as set forth in the schedule of fees and charges as adopted by ordinance of the Humboldt County Board of Supervisors. The Department will provide a bill to the applicant after the decision. Any and all outstanding Planning fees to cover the processing of the application to decision by the Hearing Officer shall be paid to the Humboldt County Planning Division, 3015 "H" Street, Eureka.

ATTACHMENT 2

Staff Analysis of the Evidence Supporting the Required Findings

Required Findings: To approve this project, the Hearing Officer must determine that the applicant has submitted evidence in support of making **all** of the following required findings.

The County Zoning Ordinance, Section 312-17.1 of the Humboldt County Code (Required Findings for All Discretionary Permits) specifies the findings that are required to grant a Special Permit:

1. The proposed development is in conformance with the County General Plan;
2. The proposed development is consistent with the purposes of the existing zone in which the site is located;
3. The proposed development conforms with all applicable standards and requirements of these regulations;
4. The proposed development and conditions under which it may be operated or maintained will not be detrimental to the public health, safety, or welfare; or materially injurious to property or improvements in the vicinity;
5. 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 (the mid-point of the density range specified in the plan designation).
6. In addition, the California Environmental Quality Act (CEQA) states that one of the following findings must be made prior to approval of any development which is subject to the regulations of CEQA. The project either:
 - a) is categorically or statutorily exempt; or
 - b) has no substantial evidence that the project will have a significant effect on the environment and a negative declaration has been prepared; or
 - c) has had an environmental impact report (EIR) prepared and all significant environmental effects have been eliminated or substantially lessened, or the required findings in Section 15091 of the State CEQA Guidelines have been made.

1. General Plan Consistency. The following table identifies the evidence which supports finding that the proposed action is in conformance with all applicable policies and standards in the Framework General Plan.

Relevant Plan Section(s)	Summary of Applicable Goal, Policy or Standard	Evidence Which Supports Making the General Plan Conformance Finding
§2400 Housing	Housing shall be developed in conformity with the goals and policies of the Humboldt County Housing Element.	No new housing is proposed. Applicant is seeking permit for the existing 2 nd residence as housing for 1-2 collective members who reside on the site during the growing season.
§2500 Rural Land Use	Agricultural lands shall be conserved and conflicts minimized between agricultural and non-agricultural uses (§2523).	The subject parcel is zoned Unclassified. The underlying General Plan land use designation is Agriculture/Grazing (AG). The proposed action would permit an existing commercial plant cultivation operation.
§2600 Urban Land Use	Urban land use planning should occur in areas of the County characterized by dense patterns of development.	The subject parcel is not in any Community Planning Area.
§2700 Land Use; §2723 Agriculture/ Grazing	<p>Primary uses include production of plants.</p> <p>Minimum parcel size allowed in the zone (20 acres) is permissible if:</p> <p>A. The subdivision will result in significant production improvements through intensive management for the growing of crops and animals; and</p> <p>B. An agricultural economic feasibility plan is approved on the significant production improvements; and</p> <p>C. Adequate access, water and geologic stability can be demonstrated for the proposed use and the land division meets all other regulatory requirements; and</p> <p>D. On each parcel, the residential site is located, to the fullest practical extent, in areas of the lowest productivity; and</p> <p>E. Access to the remainder is consistent with the uses of the remaining property.</p>	The subject parcel is zoned Unclassified. The underlying General Plan land use designation is AG. The proposed action would permit an existing agricultural operation on a 63-acre parcel resulting from a prior subdivision.

§3200 Hazards	New development shall minimize risk to life and property in areas of high geologic, flood and fire hazards.	The subject parcel is in an area shown as high slope instability and high fire danger; however, the proposed action would permit an existing activity. No new development is proposed.
§3420 Biological Resources	<p>§3431 Biological Resource Maps shall be incorporated into the project review process in order to identify sensitive habitat concerns.</p> <p>§3432 Where necessary, the width of the Streamside Management Area (SMA) may be expanded to include areas of significant riparian vegetation up to 200 feet. Development allowed instream channels includes agricultural diversions and wells.</p>	<p>The Biological Resource maps of the Framework Plan do not identify any sensitive or critical habitat areas on the subject parcel. According to the applicant's completed RWQCB Reporting Form, dated June 3, 2017, there are burlap pots approximately 20 feet from the a Class III stream (in Zone 2). The project's recommended conditions approval include a requirement that the applicant provide written verification from the RWQCB that an enhanced, reduced, or modified watercourse or wetland setback has been agreed upon by the operator and the RWQCB under enrollment pursuant to NCRWQCB Order No. 2015-0023 and/or prepare a Water Resources Protection Plan; or that a modification of this Conditional Use Permit to authorize relocation of this cultivation must be secured.</p> <p>No structures or facilities associated with cultivation are inside an SMA.</p>
§3500 Cultural Resource Protection	New development shall protect cultural, archeological and paleontological resources.	A cultural resources survey was performed by DZC Archaeology and CRM Consulting, with negative results. The report was forwarded to the Tribal Historic Preservation Officer of the Bear River tribe. The THPO commented that with the negative survey report, there were no further concerns. It was requested that the standard inadvertent discovery language be included. Attachment 1 accordingly includes this language.

2. The proposed development is consistent with the purposes of the existing zone in which the site is located; and 3. The proposed development conforms with all applicable standards and requirements of these regulations. The following table identifies the evidence which supports finding that the proposed development is in conformance with all applicable policies and standards in the Humboldt County Zoning Regulations.

Zoning Section	Summary of Applicable Requirement	Evidence
§314-8.1 Unclassified (U) §314-55.4.8.2 §314-55.4.8.2.2	General agriculture is a principal permitted use. In all zones consisting of timberland, cultivation shall be permitted in a 3-acre conversion exemption area or in non-timberland open area. Permits for existing outdoor cultivation in zoning districts including U may be issued only when possible to bring them into compliance with all applicable standards. The total cultivation area shall not exceed 1 acre for outdoor cultivation.	The subject parcel is zoned U. The proposed action would permit a commercial cannabis cultivation that was in existence prior to January 1, 2016. The existing cultivation area totals 24,100 sf (0.55 acre). A review of aerial imagery, Google Earth, shows that circa 2009 there was a conversion of timberland at Site 2. The project's conditions of approval include a requirement that the applicant demonstrate conformance HCC §314-55.4.10(j).
Minimum Lot Area:	6,000 sf	The subject parcel is approximately 63 acres.
Max. Lot Coverage:	40 percent	N/A
Min. Yard Setbacks §314-55.4.11(d):	All cannabis cultivation and processing areas shall be set back at least 30 feet from any property line	All cultivation and processing areas are set back at least 30 feet from property lines.
Max. Building Height:	None specified	N/A
§314-109.1.3.3: Off-Street Parking:	None specified	N/A

314-55.4 Commercial Cultivation, Processing, Manufacturing and Distribution of Cannabis for Medical Use Inland Land Use Regulation (CMMLUO)

§314-55.4.8	[...] For purposes of this Section, the underlying General Plan land use designation will be controlling for all parcels zoned "Unclassified."	The subject parcel is zoned U and is designated AG in the Framework General Plan. Plant production is an approved use on parcels zoned AG; the subject parcel is consistent in size and residential density with requirements for AG uses in the Framework General Plan.
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§314-55.4.8.2.2 Existing Outdoor Cultivation Areas	A Zoning Clearance Certificate, Special Permit or Use Permit may be issued for outdoor or mixed-light commercial cannabis cultivation for some or all of the cultivation area in existence prior to January 1, 2016, in zoning districts [...] U [...] only when possible to bring them into compliance with all applicable standards set forth in this section and to eliminate existing violations as specified in this ordinance. No expansion of the existing cultivation area shall be permitted. The total cultivation area allowed on a single parcel shall not exceed one acre for outdoor cultivation.	The proposed action will permit an existing outdoor cannabis cultivation of 0.55 acre on a 63-acre parcel zoned U. No expansion of the cultivation area is proposed.
§314-55.4.8.10 Permit Limit	No more than four commercial cannabis activity permits may be issued to a single person.	According to records maintained by the Department, the applicant holds no other cannabis activity permits, and is entitled to four.
§314-55.4.9.4 Pre-Application Registration	All operators of existing cultivation sites seeking recognition of cultivation activities that occurred on or before January 1, 2016, for purposes of obtaining a Zoning Clearance Certificate or discretionary permit for ongoing commercial cannabis cultivation for medical use pursuant to the CMMLUO shall register with the County of Humboldt Department of Planning & Building within 180 days of the effective date of this ordinance.	The applicant submitted the required registration form on August 16, 2016.
§314-55.4.10 Application Requirements	Identifies the Information Required for All Applications	All the required information was received.
§314-55.4.11 Performance Standards	Identifies the Performance Standards for Cannabis Cultivation Activities	All the applicable performance standards are included as conditions of project approval. They are required to be met throughout the timeframe of the permit.
§314-55.4.17 Sunset Date	No application for any Use Permit pursuant to the CMMLUO shall be processed for issuance or approval that is received after December 31, 2016.	The applicant submitted an application for a Use Permit pursuant to the CMMLUO on November 29, 2016.

4. Public Health, Safety, and Welfare: The following table identifies the evidence which supports finding that the proposed development will not be detrimental to the public health, safety and welfare or materially injurious to properties or improvements in the vicinity.

Code Section	Summary of Applicable Requirement	Evidence that Supports the Required Finding
§312-17.1.4 Special Permit Findings	The proposed development will not be detrimental to the public health, safety and welfare, and will not be materially injurious to properties or improvements in the vicinity.	The proposed action would permit an existing cannabis cultivation operation. Permitting the operation would not result in any change to existing conditions that would be detrimental to the public health, safety, and welfare.

5. Residential Density Target: The following table identifies the evidence which supports finding that the proposed project will 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.

Code Section	Summary of Applicable Requirement	Evidence that Supports the Required Finding
312-17.1.5 Housing Element Densities	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 (the midpoint of the density range specified in the plan designation), except where: 1) the reduction is consistent with the adopted general plan including the housing element; and 2) the remaining sites identified in the housing element are adequate to accommodate the County share of the regional housing need; and 3) the property contains insurmountable physical or environmental limitations and clustering of residential units on the developable portions of the site has been maximized.	The proposed project involves an existing commercial cannabis cultivation and does not propose any new residences on the subject parcel. The applicant is seeking separate permitting for an existing residence as housing for 1-2 employees.

6. Environmental Impact:

Consistent with the California Environmental Quality Act (CEQA), the project was evaluated for any potential adverse effects on the environment. Based on a site inspection, information in the application, a review of relevant references in the Department, and comments from affected agencies, staff has determined that there is no evidence before the Department that the project could have any adverse effect, either individually or cumulatively, on the environment.

The project has been determined to be exempt from CEQA pursuant to Section 15301 - Existing Facilities, of the Guidelines for the Implementation of CEQA. Section 15301 exempts from environmental review the permitting of existing facilities involving negligible or no expansion of an existing use. The proposed action would permit an existing commercial medicinal cannabis cultivation and on-site processing operation with no expansion of the existing use. The only proposed changes to existing facilities are the installation of a well that will replace existing surface water diversions as the water source for the property.

ATTACHMENT 3

Applicant's Evidence in Support of the Required Findings

Attachment 3 includes a listing of all written evidence which has been submitted by the applicant in support of making the required findings. The following materials are on file with the Planning Division:

1. The name, contact address and phone number(s) of the applicant. (Application form on file; e-mail reporting the change of applicant's business name is attached)
2. If the applicant is not the record title owner of parcel, written consent of the owner for the application with original signature and notary acknowledgement. (On-file)
3. E-mail from DZC Archaeology and CRM Consulting reporting negative results of a cultural resources survey of the property. (Attached)
4. Site plan showing the entire parcel, including easements, streams, springs, ponds and other surface water features, and the location and area for cultivation on the parcel with dimensions of the area for cultivation and setbacks from property lines. The site plan shall also include all areas of ground disturbance or surface water disturbance associated with cultivation activities, including: access roads, water diversions, culverts, ponds, dams, graded flats, and other related features. If the area for cultivation is within ¼ mile (1,320 ft.) of a school, school bus stop, church or other place of religious worship, public park, or Tribal Cultural Resource, the site plan shall include dimensions showing that the distance from the location of such features to the nearest point of the cultivation area is at least 600 feet. (Attached)
5. A cultivation and operations plan that meets or exceeds minimum legal standards for water storage, conservation and use; drainage, runoff and erosion control; watershed and habitat protection; and proper storage of fertilizers, pesticides, and other regulated products to be used on the parcel, and a description of cultivation activities (outdoor, indoor, mixed light), the approximate date(s) cannabis cultivation activities have been conducted on the parcel prior to the effective date of this ordinance, if applicable, and schedule of activities during each month of the growing and harvesting season. (Attachment 3A)
6. Copy of the statement of water diversion, or other permit, license or registration filed with the State Water Resources Control Board, Division of Water Rights, if applicable. (Not Applicable)
7. Description of water source, storage, irrigation plan, and projected water usage. (Attachment 3A)
8. Copy of Notice of Intent and Monitoring Self-Certification and other documents filed with the North Coast Regional Water Quality Control Board demonstrating enrollment in Tier 1, 2 or 3, North Coast Regional Water Quality Control Board Order No. 2015-0023, or any substantially equivalent rule that may be subsequently adopted by the County of Humboldt or other responsible agency. (On-file)

9. If any on-site or off-site component of the cultivation facility, including access roads, water supply, grading or terracing impacts the bed or bank of any stream or other watercourse, a copy of the Streambed Alteration Permit obtained from the Department of Fish & Wildlife. (Not Applicable)
10. If the source of water is a well, a copy of the County well permit, if available. (On-file)
11. If the parcel is zoned FR, U or TPZ, or involves the conversion of timberland as defined under section 4526 of the Public Resources Code, a copy of a less-than-3-acre conversion exemption or timberland conversion permit, approved by the California Department of Forestry and Fire Protection (CAL-FIRE). Alternately, for existing operations occupying sites created through prior unauthorized conversion of timberland, evidence may be provided showing that the landowner has completed a civil or criminal process and/or entered into a negotiated settlement with CAL-FIRE. (On-file)
12. Consent for onsite inspection of the parcel by County officials at prearranged date and time in consultation with the applicant prior to issuance of any clearance or permit, and once annually thereafter. (On-file)
13. For indoor cultivation facilities, identify the source of electrical power and how it will meet with the energy requirements in section 55.4.8.2.3, and plan for compliance with applicable Building Codes. (Not applicable)
14. Acknowledge 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 in the event that environmental conditions, such as a sustained drought or low flows in the watershed will not support diversions for irrigation. (On-file)
15. Acknowledge that the county reserves the right to engage with local Tribes before consenting to the issuance of any clearance or permit, if cultivation operations occur within an Area of Traditional Tribal Cultural Affiliation, as defined herein. This process will follow current departmental referral protocol, including engagement with the Tribe(s) through coordination with their Tribal Historic Preservation Officer (THPO) or other tribal representatives. This procedure shall be conducted similar to the protocols outlined under SB 18 (Burton) and AB 52 (Gatto), which describe "government to government" consultation, through tribal and local government officials and their designees. During this process, the tribe may request that operations associated with the clearance or permit be designed to avoid, minimize or mitigate impacts to Tribal Cultural Resources, as defined herein. Examples include, but are not limited to: conducting a site visit with the THPO or their designee to the existing or proposed cultivation site, requiring that a professional cultural resources survey be performed, or requiring that a tribal cultural monitor be retained during project-related ground disturbance within areas of sensitivity or concern. The county shall request that a records search be performed through the California Historical Resources Information System (CHRIS). (On-file)



**Calisun Farms Inc.
2017 Operations Plan**

**Permit Application No. 11548
APN: 208-321-007**

5/3/2017

**Prepared by:
Dan Salazar
dan@calisunfarms.org**

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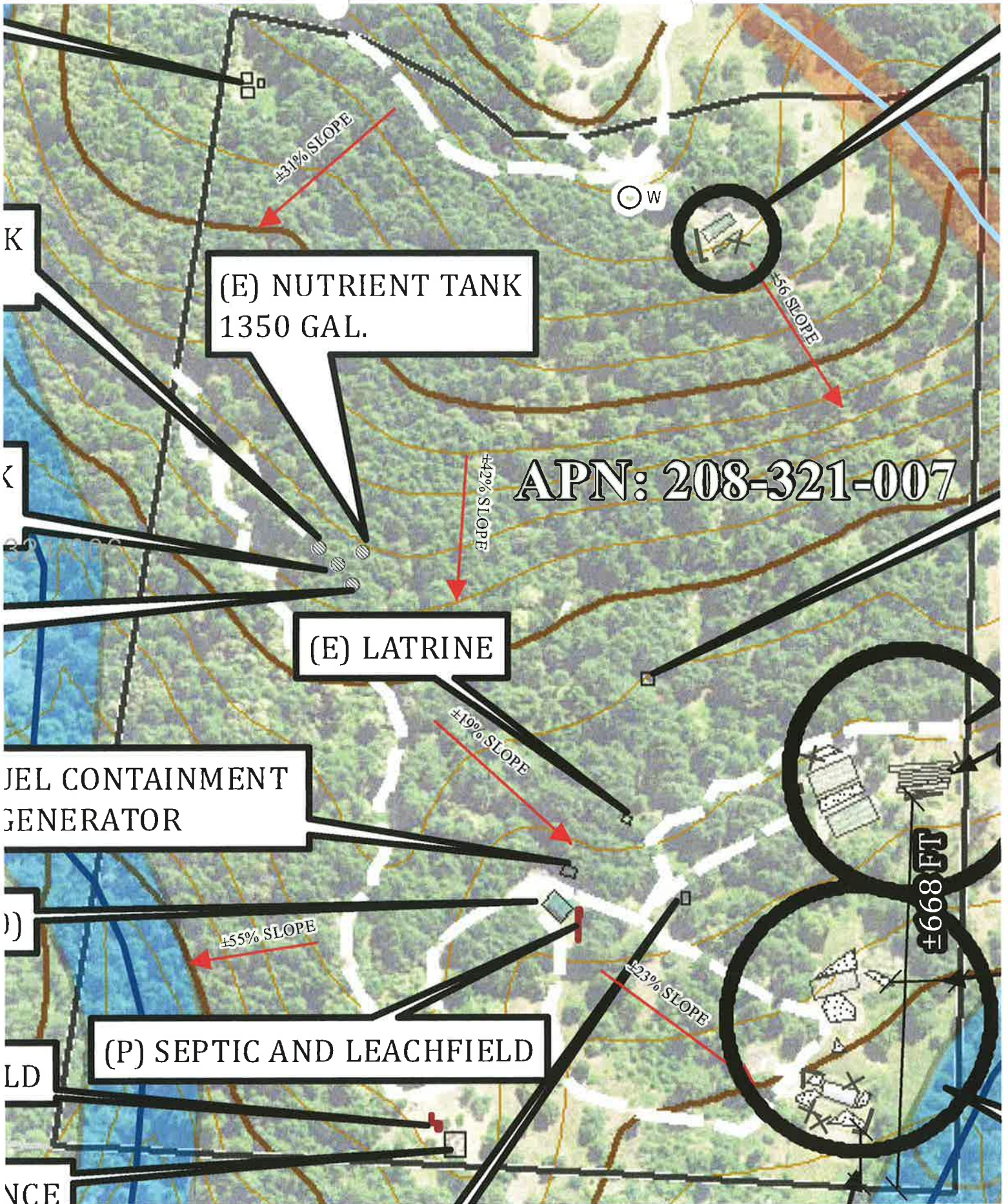
INTRODUCTION

Calisun Farms Inc. is a mutual benefit non-profit corporation that plans to cultivate medicinal cannabis for member needs in Humboldt County at APN 208-321-007 in 2017. Calisun Farms will operate as a cannabis collective in accordance with the Medical Marijuana Regulation and Safety Act (MMRSA) and Humboldt County's Commercial Medical Marijuana Land Use Ordinance (CMMLUO). Any issues of noncompliance addressed in this report or otherwise brought to attention will be cured as soon as possible.

Calisun Farms submitted a Commercial Cannabis Activity Registration Form on August 6, 2016 to the Humboldt County Planning Department. On November 31, 2016 Calisun Farms submitted an application for Use Permit (No. 11538) and paid a deposit of \$2,577.45 to the Humboldt County Planning Department. A copy of the Commercial Cannabis Activity Registration Form, the Application Form, and the Deposit Receipt can be found in Appendix A.

APN 208-321-007 is approximately sixty-three acres and is zoned Unclassified (U). The cultivation activities include approximately 24,100 square feet with no artificial lighting. Activity was established and operated prior to January 1, 2016 as documented by satellite imagery available via Humboldt GIS (<http://www.humboldt.gov/1357/Web-GIS>). A Plot Plan was developed for Calisun Farms by Trinity Valley Consulting Engineers (TVCE) and can be found in Appendix B. An enlarged version of the plot plan can be found on the following page. TVCE surveyed the parcel including detail concerning cultivation areas and determined that the total square footage was 24,100 in contrast to the 20,390 square feet that was originally submitted with the Commercial Cannabis Activity Registration Form (Appendix A). Calisun Farms is confident that the detailed survey provided by TVCE reflects the accurate square footage.

This report aims to describe: An overview of the property; water resources management; watershed, habitat and landscape conservation; cultivation and processing activities and timeline; and Calisun Farms' security plan. Calisun Farms' management practices reflect those outlined by the Humboldt County Planning and Building Department's "Performance Standards for all CMMLUO Cultivation and Processing Operations," and the NCRWQCB's "Best Management Practices for Discharges of Waste Resulting from Cannabis Cultivation and Associated Activities or Operations with Similar Environmental Effects."



WATER RESOURCES

This section discusses current and planned water sources, water conservation and use, habitat and watershed protection, and the storage and use of agricultural chemicals at Calisun Farms.

Water Sources

CALISUN Farms is currently pursuing the installation of a well to provide water for domestic and cultivation needs. Services were procured from Watson Well Drilling Inc. and they submitted an application for well construction to the Department of Health and Human Services on October, 21, 2016. Please refer to Appendix D for the "Water Well Application #16/17-0409." The proposed well location can be seen on the plot plan in Appendix B.

Previously, there were two water sources that were being utilized: One for domestic and vegetable garden use and one for commercial cannabis cultivation needs. Both of these sources originated on the neighboring parcel 208-321-005, owned by Barney Callahan. Permission to use these sources was granted through a long standing verbal agreement between Barney Callahan (208-321-005) and John Landry (208-321-007).

The domestic source was a spring with twelve-inch cistern. The cultivation source was an in-stream twelve-inch cistern. Both sources were fitted with a three quarter inch line with dampers installed to ensure a limited and controlled draw. Calisun Farms is not currently pursuing a Streambed Alteration Permit, since the well will be the water source for crop irrigation and domestic use in the 2017 growing season.

Water Storage

Table 1: Water Storage by Container Type and Capacity

Container Type	Capacity
Bladder #1	20,000
Bladder #2	20,000
Bladder #3	10,000
Bladder #4	20,000
Nutrient Storage Tank #1	2,500
Nutrient Storage Tank #2	2,850
Nutrient Storage Tank #3	1,275
Nutrient Storage Tank #4	2,500
Nutrient Storage Tank #5	1,000
Domestic Storage Tank #1	1,000
Domestic Storage Tank #2	2,500
Total Storage	83,625

Water can be stored in a variety of vessels and locations at Calisun Farms. Total water storage capacity is approximately 83,625 gallons¹. Please refer to Table 1 for a list of the type of storage containers and their capacity.

All tanks and bladders have been appropriately situated on level and compacted flats in areas suitable for bearing full capacity weight. Bladders have secondary containment to avoid runoff and erosion in case of failure. Tanks have float valves to prevent over flow. Tanks and bladders will be regularly monitored for leaks. As previously noted, Calisun is in the process of building a well, after which the bladders will be decommissioned or used for emergency storage

for wildfires. Water storage locations can be found on the Plot Plan in Appendix B.

¹ Note: There is 83,625 gallons of water storage despite the discrepancy on both the plot plan, which erroneously reports 73,100 gallons, and the NCRWQCB Reporting Form which falsely reports 69,000 gallons.

In an effort to reduce water withdrawals negatively impacting habitat and wildlife Calisun can take advantage of seasonal availability of water. Stored water may be diverted in the wetter months (January – May) to be utilized in the drier months (June – October). This forbearance is in alignment with NCRWQCB requirements. Please refer to Table 1, “Water Budget,” for a more complete breakdown of when water was stored and when it was used throughout the previous years.

Irrigation and Water Conservation

Calisun Farms will use water conservation techniques to stretch water resources. One-way and safety valves are installed in the water lines to provide redundancy against water loss. The primary irrigation method will be “drip irrigation” with automated timers to maximize water use efficiency, monitor crop water consumption, and prevent misuse. When the plants must be hand watered, water meters will be attached to the watering hose. Drip or hand watering will occur in the cooler morning or evening hours to limit evaporation.

Regular maintenance of the irrigation system will include the inspection of each drip zone for leaks or breaks, walking the water lines to check for leaks, and monitoring water storage for water quantity, leaks, and functionality of float valves.

All exposed cultivation soil will be mulched with either straw, alfalfa, compost, or worm castings to further limit water loss. The majority of cannabis cultivated at Calisun Farms will be grown in raised beds that dramatically lower water consumption by reducing surface area evaporation. In the case that fabric pots are used, the outside of the pot will be covered with cardboard or straw to protect and cool the root zone.

Projected Water Use

Calisun Farms projects a total of approximately 75,000 gallons of water usage in the 2017 growing season, based on estimations of 2016 water use and storage records. Figure 1 illustrates when water is used and stored. When the well is installed it will be outfitted with a meter, providing accurate quantification of irrigation water use.

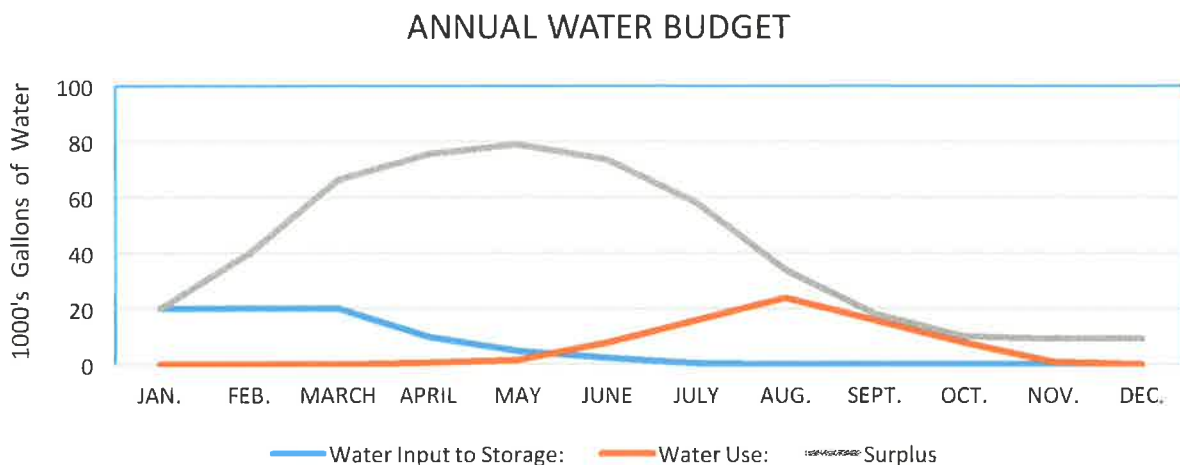


Figure 1: Annual Water Budget

Runoff and Erosion

Runoff during cultivation will be mitigated by the use of drip irrigation, mulching, and by avoiding overwatering. After cultivation, soil from freestanding fabric pots will be piled and covered with securely fastened plastic tarps. Additionally, bales of straw will be placed around the piles ensure the soil mixture does not run off. The soil will be amended for reuse each year with materials like alfalfa, bone meal, and compost.

Erosion control measures include the placement of rolling dips (water bars) on steeper sections of roads. Lightly used roadways and other areas with disturbed soil will be annually seeded with non-invasive grasses and mulched with straw to encourage soil retention. Consultation with TRC revealed additional erosion control and enhanced drainage is necessary. Calisun Farms expects specifics about these repairs to be described in the Water Resource Protection Plan from TRC. These repairs are slated for completion by October of 2021, as shown in Appendix B.

WATERSHED AND HABITAT PROTECTION

Practices to protect the watershed and habitat will be in action during everyday activities at Calisun Farms. For example, protocols for refuse, compost, and recycling help keep wildlife out of the trash. All refuse that cannot be diverted to compost or recycling will first be collected in fastened outdoor trash bags and then placed in a secure trash bin impermeable to wildlife. Similar bins are utilized for recyclable items (aluminum, glass, plastic, etc.) and compost (food waste, cannabis leaves and stems, etc.). These receptacles are emptied regularly or as they become full. All garbage and recycling are securely fastened for transport to the proper disposal facility. Any supplies like fabric or plastic pots are gathered and stored promptly after use.

FERTILIZERS, PESTICIDES AND FUELS

Calisun Farms will cultivate cannabis using organic principles. Fertilizers to be used include organic liquid bone meal, organic soluble kelp, and organic vegetable based soluble nitrogen. Any pesticides and fungicides used are also organic and naturally derived. Safe use and handling are top priorities, including precautions to avoid run off, spills, and wildlife interference. Anyone handling these chemicals is encouraged to use the information on their safe use and the personal protective equipment available in the nearby agricultural building.

All fertilizers and pesticides will be stored in one location. They will be contained in a metal 13' x 2' x 2' airtight and waterproof army surplus container. All nutrients will be kept in their original containers with closed lids and legible labels. Transfer of fluids will be carefully done over the storage container to prevent contamination of surrounding soil. The storage container also has eight spring-loaded metal closures to avoid wildlife tampering. Off-season, products will be kept in the same storage container, but with an additional chain and padlock on the container.

Gasoline will be stored in one 240-gallon tank with a secondary containment vessel with a volume of 264 gallons. The gasoline will be used in three generators; a Honda 3000, a Honda 7000, and Subaru 3500. Generators will be situated in semi-permanent locations with metal

pans underneath to prevent engine drip soil pollution and hay bale walls to minimize noise pollution. Generators will be used for fans, an atomizer or fogger, and domestic uses.

Spills of fertilizer or petroleum will be immediately addressed. Kitty litter, biochar, shop towels, and trash bags are to be kept in the fuel storage area for any clean up necessary. Used clean up materials will be properly secured for transport to an appropriate disposal facility. An incident report form, available in “Building 1”, will be completed to ensure shared knowledge of continued clean up or special care required.

CULTIVATION ACTIVITIES

Calisun Farms will be described as ‘outdoor cultivation’, meaning cultivation activities take place in the natural growing season and supplemental light will not be used. The timing of the cultivation cycle is heavily dependent on the seasonality of the weather. A particularly cold or wet spring may delay activity well into June. If it is a warm spring and the roads have dried out and are free of snow cultivation may begin as early as April. In general terms Calisun Farms aims to plant the cannabis in late spring and harvest in early fall.

Operations will be limited to one “light deprivation” (dep) crop and one “full season” crop. A typical cultivation cycle begins in early spring by preparing the soil in each area for planting. Both types of crops will be maintained with watering, feeding, and pruning until their harvests. The dep crop will be harvested in August, and if conditions are ideal the raised beds can be replanted with a second crop. The full season crop will be harvested in October, as well as the possible second crop in the raised beds. Each harvested crop must be dried, trimmed, and processed. Following is a brief description of each phase in the cultivation cycle.

Soil Preparation

The soil is prepared in spring with analysis, amending, tilling, and potting. Soil samples will be taken to a local soil scientist for evaluation. The analysis includes an evaluation of missing nutrients and a recommendation of amendments, like alfalfa, bone meal, gypsum, compost etc. The recommended amendments will be applied to and tilled into the raised beds and soil piles. After the amendments are mixed into the pile, soil will be distributed into fabric pots or spread evenly in the beds. Compost tea will be applied to inoculate with beneficial microorganisms and finally the soil will be ready to plant. Preparing the soil in this fashion will reduce the need for liquid fertilizers and pesticides later in the season.

Transplanting

After the soil is prepped, plant starts will be brought to the farm. Plant starts for the dep crop will be transplanted in to the areas with raised beds, typically in May. Plant starts for the full season crop will be transplanted in June to the fabric pots. This arduous task can take weeks for each crop.

Maintenance: Watering, Feeding, and Pruning

Drip irrigation will be the primary watering strategy all season long. Drip emitters will be regulated by timers and water plants in the cooler hours of early morning or overnight to maximize water uptake and limit evaporation. Plants will be hand-watered when plant food such as molasses or compost tea is applied as to avoid clogging drip emitters. Additional organic liquid fertilizer is to be used only as needed. Vegetable-based nitrogen, liquid bone

meal, and soluble kelp are added to the nutrient mixing tanks and delivered to the plants by either drip system or hand watering. Records of when any additives are used will be kept.

Compost tea, neem oil based insecticide, and *Bacillus subtilis* fungicides will be used as foliar sprays to feed and protect the plants. The crop must be closely monitored for mold or mildew growth and any issues are to be immediately addressed. These products are not safe to apply to cannabis flower near harvest, so any molds or mildews present at harvest are carefully removed during processing.

Harvesting and Drying

Cannabis is ideally harvested at peak ripeness. The dep crop will be harvested in late summer, and the rest will be harvested in October or before the rains come. Regardless of the cultivation cycle, plants will be cut down using garden loppers and carefully transported to the "Ag Building" (Appendix B) to be hung and dried. Moisture levels must be closely monitored around the clock to ensure the crop does not dry too slowly and mold or dry too fast and become brittle. When the cannabis is dry, branches will be cut into pieces that fit in large plastic totes for storage until it can be trimmed and processed.

PROCESSING PLAN

After the cannabis is harvested and dried, on-site processing will begin. Calisun Farms will provide a safe and clean environment for the processing workers in the "Ag Building" (Appendix B). Exclusively, members of the Calisun Collective will be recruited to trim the cannabis. Membership requires individuals be at least eighteen years of age and possess a signed physician's recommendation for the use of medical marijuana. Members must complete and sign the "MEMBER REGISTRATION" form, "MEMBERSHIP PLEDGE", and "MEMBER RULES AND CONDITIONS" which describe participation and security protocols. These documents are found in Appendix E. Calisun Farms will limit the number of workers as to five to seven individuals to reduce impacts like road and resource use. These workers will be lodged and utilize the restroom in the building labeled as "As-Built Structure" on the plot plan (Appendix B).

Lights, tables and chairs will be provided, as well as disposable masks and gloves, and alcohol or oil for cleaning tools. The tables will be wiped and floors swept daily. The building has windows and fans for ventilation, and a woodstove for warmth. A handwashing station outside of the building will be outfitted with warm water, soap, and paper towels. Employees will be required to wash their hands before and after work, or they must wear gloves. This protects the cannabis from cross contamination, and protects workers from over-exposure to cannabis resins.

Calisun will utilize experienced members that are familiar with the appearance of moldy or mildewed buds, however, training will be provided as needed. Properly lit working areas, breathing masks and disposable gloves will help trimmers find and remove tainted cannabis. Moldy or mildewed buds will be discarded into the compost.

Trimmed cannabis will be collected by a designated person each evening. The cannabis is to be stored in a locked container in a locked room in the main structure, which is then locked overnight. In the morning, each worker's trimmed cannabis will be screened for quality control, weighed, recorded, then added to a larger bin of finished product.

SCHEDULE OF ACTIVITIES

Table 2: Monthly Schedule of Activities

Month	Activity	Generator
January	Off Season. No Activity.	
February	Off Season. No Activity.	
March	Off Season. No Activity.	
April	Beginning of season: Return to property. Soil Test. Test and repair irrigation system.	
May	Bring light deprivation seedlings to property. Begin cultivation for light deprivation cycle. Distribute soil from piles.	x
June	Bring full season seedlings to property. Plant full season plants. Switch to stored water.	x
July	Maintain dep crop. Maintain full season crop.	x
August	Harvest, dry, and process dep crop. Maintain full season crop.	x
September	Maintain full season crop.	x
October	Harvest and dry full season crop. Return soil to piles. Store fertilizers and equipment.	x
November	Process full season crop. Shut down property.	x
December	Off Season. No Activity.	

Projected Generator Use by Monthly Fuel Consumption

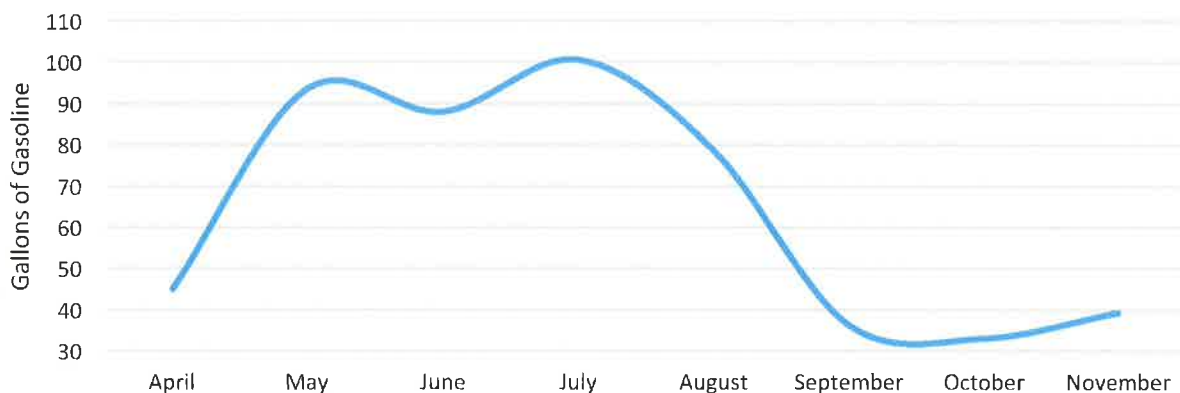


Figure 2: 2017 Projected Generator Use

Fire Prevention, Emergency Preparedness, and Security Plan

Fire Prevention

Fire prevention protocol involves extreme caution with handling gasoline, generators and power tools. Landscape maintenance like brush clearing, mowing, or chainsaw operation

will not occur during the peak heat and dryness to prevent machine related ignition of surrounding materials. Safety training will be required for any person handling fuels or power tools. All work areas, especially around buildings and generators, will be cleared of brush and debris for fire safety.

Appliances are double checked each spring for proper installation and safety. No smoking is permitted within 25' of any fuel storage or in dry grass areas. Cigarettes, if smoked, are to be extinguished in an appropriate ash tray and/or vessel. No woodstove fires will be permitted during the dry season. Burning will be executed in 55-gallon barrels or small rings, with the area cleared around them. Any burning will occur only on permissible burn days in accordance to the obtained burn permit. Fire extinguishers are located in each building, in all vehicles, in each cultivation area, and in each building.

Emergency Preparedness

When employees or members first visit the property emergency preparedness is discussed. Emergency contact phone numbers, including the county sheriff, poison control, emergency medical facilities, and the California Highway Patrol are located on site. A professional grade first aid kit with manual is available on site. Additional first aid kits are located at each cultivation site as well as in all vehicles. Directions and addresses of local emergency medical care facilities will be provided. Emergency exit strategies are discussed in case of fire. More specifically, if the main road is blocked by fire or landslide, escape is possible on foot by hiking down to the bottom of the property to Strum Road, which then connects to Alderpoint Road where pick-up can will be arranged

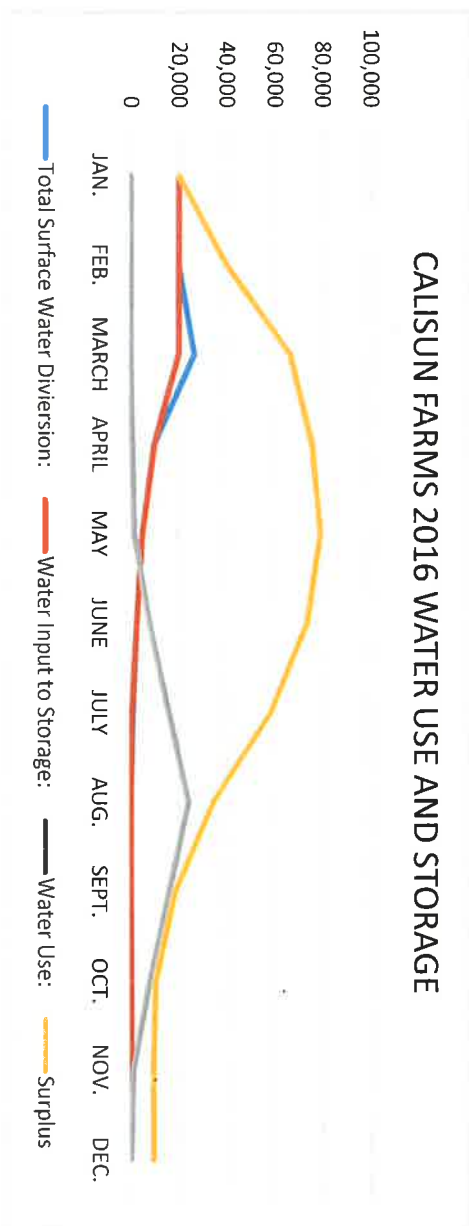
Security Plan

The intent of the security plan is to keep all members/employees safe and to restrict non-members from gaining access to the property and/or cannabis. These goals are achieved through a variety of security measures including locked gates, locked buildings, surveillance, and restricted access to the property.

There is only one road in and out of parcel 208-321-007. The single road is protected by a gate that has a padlock and security camera. Only full-time employees and the land owner possess keys to the lock. The lock is changed annually to ensure any copied keys are rendered obsolete. The roads leading to Calisun Farms possess an additional two locked "community gates" located on neighboring parcels which act as an additional security buffer.

All buildings on the parcel kept locked when member-employees are absent. Harvested cannabis produced by Calisun Farms is secured, including buildings containing cannabis that is drying, dried or processed. Cannabis is monitored by security cameras to identify any person accessing the cannabis.

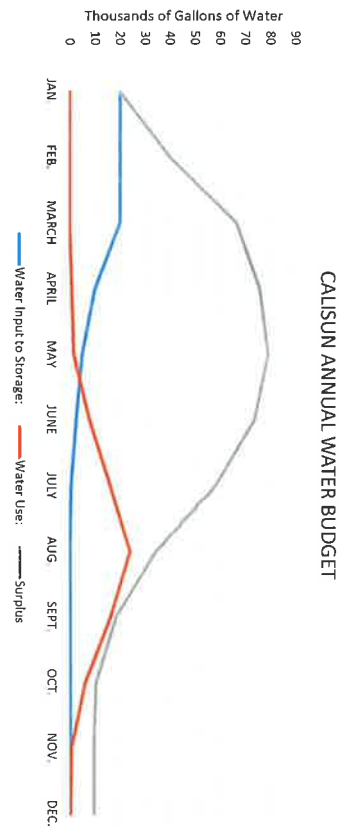
Total Surface Water Diversion:	JAN.	FEB.	MARCH	APRIL	MAY	JUNE	JULY	AUG.	SEPT.	OCT.	NOV.	DEC.	
	20,000	20,000	26,625	10,000	5,000	2,500	1,000	0	0	0	0	0	85,125
Water Input to Storage:	20,000	20,000	20,000	10,000	5,000	2,500	500	0	0	0	0	0	85,125
BLADDER #1 (20,000 GAL)	20,000	0	0	0	0	0	0	0	0	0	0	0	
BLADDER #2 (20,000 GAL)	0	20,000											
BLADDER #3 (20,000 GAL)	0		20,000										
BLADDER #4 (10,000 GAL)	0			10,000									
Nutrient Storage Tank # 1 (2,500 GAL)			2,500	2,500	2,500								
Nutrient Storage Tank # (2,850 GAL)			2,850	2,850	2,850								
Nutrient Storage Tank # (1,275 GAL)			1,275	1,275	1,275	500							
Water Use:	0	0	0	800	1600	8,000	16,000	24,000	16,000	8,000	1,000	0	75,400
Surplus	20,000	40,000	66,625	75,825	79,225	73,725	58,225	34,225	18,225	10,225	9,225	9,225	18,950



Water Input to Storage:

BLADDER #1 (20,000 GAL)	Container Type	Capacity	Location
BLADDER #2 (20,000 GAL)	Bladder #1	20,000	Shady Grove
BLADDER #3 (20,000 GAL)	Bladder #2	20,000	Shady Grove
BLADDER #4 (10,000 GAL)	Bladder #3	10,000	Below Nutrient Row
Nutrient Storage Tank # 1 (2,500 GAL)	Bladder #4	20,000	Shady Grove
Nutrient Storage Tank # (2,850 GAL)	Nutrient Storage Tank #1	2,500	Nutrient Row
Nutrient Storage Tank # (1,275 GAL)	Nutrient Storage Tank #2	2,850	Nutrient Row
	Nutrient Storage Tank #3	1,275	Nutrient Row
	Nutrient Storage Tank #4	2,500	Above Cultivation Site #5
	Nutrient Storage Tank #5	1,000	Above Cultivation Site #6
	Domestic Storage Tank #1	1,000	Near Entrance Gate to Parcel
	Domestic Storage Tank #2	2,500	Near Entrance Gate to Parcel
		83,625	

	JAN.	FEB.	MARCH	APRIL	MAY	JUNE	JULY	AUG.	SEPT.	OCT.	NOV.	DEC.	
Water Input to Storage:	20,000	20,000	20,000	10,000	5,000	2,500	8,000	16,000	24,000	16,000	6,000	0	78,000
Water Use:	0	0	0	800	1600	8,000	73,725	58,225	34,225	18,225	10,225	9,225	72,900
Surplus	20,000	40,000	66,625	75,825	79,225	73,725	58,225	34,225	18,225	10,225	9,225	9,225	5,100



Column1	J	F	M	A	M2	J3	J4	A5	S	O	N	D	Column2
Water Input to Storage	20	20	20	10	5	3	1	0	0	0	0	0	79
Water Use	0	0	0	1	1.6	8	16	24	16	8	1	0	75
Deficit / Surplus	20	40	60	69	73	67	52	28	12	4	3	3	

ATTACHMENT 4

Referral Agency Comments and Recommendation

Referral Agency	Response	Recommendation	On File
County Building Inspection Division		None received	
County Public Works, Land Use Division	✓	Road Evaluation Report	✓
County Division of Environmental Health		None received	
Supervising Planner		None received	
NWIC		None received	
Department of Fish and Wildlife	✓	No SAA for surface diversions; provide additional information regarding number of plants and annual water needs	✓
Regional Water Quality Control Board		None received	
Division of Water Resources		None received	
CAL-FIRE	✓	Denial – Evidence of previous unauthorized conversions	✓
Bear River Band of the Rohnerville Rancheria	✓	Cultural resources study	✓
Bridgeville Fire Protection District		None received	
Bridgeville School District		None received	
Agriculture Commissioner		None received	
Sheriff		None received	
District Attorney		None received	
County Council		None received	