



COUNTY OF HUMBOLDT
PLANNING AND BUILDING DEPARTMENT
CURRENT PLANNING DIVISION

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Hearing Date: May 17, 2018

To: Humboldt County Planning Commission

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

Subject: **White Farms, LLC, Conditional Use Permit**
Application Number: 12193
Case Number: CUP-16-562
Assessor's Parcel Number (APN:;) 209-291-021
331 Holmes Flat Road, Pepperwood Area

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Please contact Keenan Hilton, Planner, at 707-445-7541 or by email at khilton@co.humboldt.ca.us if you have any questions about the scheduled public hearing item.

AGENDA ITEM TRANSMITTAL

Hearing Date	Subject	Contact
May 17, 2018	Conditional Use Permit	Keenan Hilton, Planner

Project Description: A Conditional Use Permit (CUP) for the White Farms, LLC, Medical Cannabis Cultivation Project (proposed project) consisting of approximately 5,000 square feet (sf) of new cannabis cultivation and an approximately 2,516-square-foot for a new appurtenant nursery. Cultivation activities extend from March through November annually. Water for irrigation purposes is sourced from an existing unpermitted well. Prior to cultivation, the applicant is required to do the following: 1) Finalize the LSA Agreement with CDFW regarding the well to determine if the well is jurisdictional, 2) Coordinate with the State Water Resources Control Board (SWRCB) to determine if the well is hydrologically connected to the Eel River, 3) Submit documentation from CDFW and SWRCB to the Planning Department that the well is non-diversionary and 4) Permit the well with the Humboldt County Department of Environmental Health. If the well is found to be diversionary, the applicant will need to submit a revised cultivation and operations plan to the Planning Department describing a non-diversionary source of water (e.g. rainwater catchment) that is proposed for irrigation. No water storage is proposed as part of the application because water is directly drawn from the well for both domestic water and for irrigation. However, the applicant will be required to install a water tank to store at least 2,500 gallons to comply with fire regulations related to its located in a State Responsibility Area (SRA). Currently, water use varies throughout the year with peak usage of 9,000 gallons per month occurring from May to October. Water use from November through April is estimated to be approximately 500 gallons per month. The plants will be irrigated and fertilized by hand. There will be a maximum of four (4) employees on-site during peak operations. Plants will be harvested, dried onsite, and then transported off-site to a licensed processing facility. Power is provided by PG&E.

Project Location: The proposed project is located in Humboldt County, in the Pepperwood area, on the north side of Holmes Flat Road, approximately 1,300 feet from the nearest intersection of State Highway 254 and Holmes Flat Road, on the property known as 331 Holmes Flat Road.

Present Plan Land Use Designations: Agriculture Exclusive/Prime and Non-prime lands (AE), Avenue of the Giants Community Plan (AVES), Density: 20 acres per dwelling unit base, Slope Stability: Low Instability (1).

Present Zoning: (AE-F) Agriculture Exclusive (AE), Flood Hazard Areas (F)

Application Number: 12193

Case Number: CUP16-562

Assessor Parcel Numbers: 209-291-021

Applicant
White Farms LLC.
PO Box 347
Cutten, CA 95534

Owner
White James A.
PO Box 347
Cutten, CA 95534

Agent

Environmental Review: The proposed project is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) per Class 3, 15303 (New Construction or Conversion of Small Structures) and Class 4, 15304 (Minor Alterations to Land Use) of the California Environmental Quality Act (CEQA) Guidelines.

State Appeal Status: The proposed project is NOT appealable to the California Coastal Commission.

Major Issues: None.

WHITE FARMS, LLC
Case Number: CUP16-562
Assessor's Parcel Number: 209-291-021

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 a part of the consent agenda:

Find the project exempt from environmental review pursuant to Sections 15303 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 White Farms, LLC, project subject to the recommended conditions.

Executive Summary: A Conditional Use Permit (CUP) in compliance with the County Commercial Medical Cannabis Land Use Ordinance (CMMLUO) for a proposed new 5,000-square foot outdoor commercial medical cannabis cultivation and a new 2,516-square-foot mixed-light appurtenant nursery. The proposed project is located on Assessor's Parcel Number (APN) 209-291-021, which is approximately 1.49 acres in area. The southern site boundary is bordered by Holmes Flat Road with frontage approximately 115 feet and extending approximately 500 feet to the north. Holmes Flat Road is gravel adjacent to the southern project boundary but is paved beginning approximately 50 feet to the east. The site is currently developed with an existing well in the southwest corner, existing residence north of the well and drying shed approximately 70 feet north of the residence and the proposed cultivation area occupying the easterly portion of the project site.

The proposed project includes development of a 5,000-square-foot outdoor cultivation area and a 2,526-square-foot mixed-light greenhouse that will house the on-site nursery. Plants will be harvested, dried onsite in the existing shed that will be used as a drying facility for approximately one week, and bucked into manageable buds. No on-site processing is proposed. White Farms LLC., will contract with and then transport the cannabis to be processed at a licensed facility. The proposed project will employ two permanent employees, an Agent in Charge and a Lead Cultivator, and up to two full-time seasonal laborers during peak harvest. Current cultivation and processing entails using "mother" plants to produce clones. Clones will be initially planted and housed in the nursery until they have rooted and are moved to the outdoor greenhouse. Cannabis plants will be hand watered and fertilized until they are ready for harvesting. The proposed project does not include the use of any pesticides or fungicides. Cannabis will be harvested and suspended in the drying facility with ventilation fans, before being transported off-site for processing at a licensed facility. The applicant will live in the existing residence on-site and the employees will commute daily to the site resulting in up to 4 vehicle trips per day. Power is provided by the Pacific Gas and Electric Company (PG&E).

New cultivation under Section 314-55.4.8.2.1 of the CMMLUO requires that water for irrigation be sourced from a documented current water right or other non-diversionary source of water (e.g., municipal, public utility, or permitted well). Further, with respect to a well, qualifying non-diversionary status is determined by whether the well is deemed jurisdictional by the State Water Resources Control Board, Division of Water Rights as required pursuant to Section 5101 of the Water Code. Generally, a water source is jurisdictional if it is a diversion from surface water from a stream, river, or underground stream. In the present application, water for domestic and irrigation purposes is sourced from an existing unpermitted well. According to comments

provided by the California Department of Fish and Wildlife (CDFW), the Applicant has submitted a Notification of Lake or Streambed Alteration (LSA# 1600-2017-0892), however, as of April 23, 2018, the LSA Agreement is in process and has not been finalized. To perfect use of this water source for new cannabis cultivation the applicant is required to do the following: 1) Finalize the LSA Agreement with CDFW regarding the well to determine if the well is jurisdictional, 2) Coordinate with the State Water Resources Control Board (SWRCB) to determine if the well is hydrologically connected to the Eel River, 3) Submit documentation from CDFW and SWRCB to the Planning Department that the well is non-diversionary and 4) Permit the well with the Humboldt County Department of Environmental Health. If the well is found to be diversionary (i.e., well draws from an "underground stream"), the applicant will need to submit a revised cultivation and operations plan to the Planning Department describing a non-diversionary source of water (e.g. rainwater catchment) that is proposed for irrigation.

According to the cultivation and operations plan, the applicant estimates 57,000 gallons of water is required annually to meet operational needs. No water storage is proposed as part of the application because water is directly drawn from the well for both domestic water and for irrigation. However, the applicant will be required to install a water tank to store at least 2,500 gallons to comply with fire regulations related to its located in a State Responsibility Area (SRA).

The project site is zoned Agriculture Exclusive (AE) with a Flood Hazard Area combining zone (AE-F). Because the subject parcel is located within the 100-year flood zone, the project is conditioned on all development in the 100-year flood plain shall comply with the Flood Damage Prevention regulation, Humboldt County Code Section 335-1 et seq. The applicant shall secure and submit a flood elevation certificate from Building Inspection no later than October 31, 2018. Conditions of approval also include preparation of a Water Resources Protection Plan (WRPP) that will incorporate best management practices (BMPs) in accordance with SWRCB's recommendations. The proposed project is located in a State Responsibility Area (SRA) for fire protection and the applicant will be required to improve the driveway to as well as the defensible space surrounding the existing structures to comply with applicable regulations. Water storage for fire protection (a minimum of 2,500 gallons) will need to be installed. Any grading or earthwork completed as part of the proposed project will be conducted by a licensed contractor in accordance with approved grading permits.

Environmental review for this proposed project was conducted and based on the results of that analysis staff believes use of CEQA Exemptions Class 3, 15303 (New Construction or Conversion of Small Structures) and Class 4, 15304 (Minor Alteration to Land Use) are applicable to the proposed project. The construction of two new greenhouses and the conversion of the shed to be used for drying are consistent with the exemption under CEQA Section 15303 CEQA. There is no substantial evidence of potentially significant adverse environmental effects resulting from the permitting of a recognized legal agricultural use (cultivation of medical Cannabis) on property zoned AE, with slopes less than 10%, and with the source of water being properly documented by the appropriate agency prior to project approval.

Based on 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 proposed project, or to require the applicant to submit further evidence, or modify the proposed project. If modifications may cause potentially significant impacts, additional CEQA analysis and findings may be required. 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 either alternative.

The Commission could also decide the proposed project may have environmental impacts that would require further environmental review pursuant to CEQA. Staff did not identify any potential impacts. As Lead Agency, the Department has determined that the proposed project is Categorical Exempt under the three Exemption Classes stated above. However, the Commission may reach a different conclusion. In that case, the Commission should continue the item to a future date at least two months later to give staff the time to complete further environmental review.

**RESOLUTION OF THE PLANNING COMMISSION
OF THE COUNTY OF HUMBOLDT
Resolution Number 18-**

**Case Number: CUP16-562
Assessor Parcel Numbers: 209-291-021**

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

WHEREAS, White Farms, LLC submitted an application and evidence in support of approving a Conditional Use Permit for approximately 5,000 square feet of new outdoor cannabis cultivation, a new 2,516-square-foot mixed light appurtenant nursery and an existing 900-square-foot shed that will be used for drying located on APN 209-291-021. Processing will be conducted at an off-site licensed facility; and

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

WHEREAS, the project is categorically exempt from environmental review pursuant to Class 3, 15303 (New Construction or Conversion of Small Structures), and Class 4, 15304 (Minor Alterations to Land), of the California Environmental Quality Act (CEQA) Guidelines; and

WHEREAS, Attachment 2 in the Planning Division staff report includes evidence in support of making all of the required findings for approving the proposed Conditional Use Permit (Case Number CUP16-562); and

WHEREAS, a public hearing was held on the matter before the Humboldt County Planning Commission on May 17, 2018; and

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

1. The project is categorically exempt from environmental review pursuant to Class 3, Section 15303 (New Construction or Conversion of Small Structures), and Class 4, Section 15304 (Minor Alterations to Land), of the California Environmental Quality Act (CEQA) Guidelines; and
2. The findings in Attachment 2 of the Planning Commission staff report support approval of Case Number CUP16-562 based on the submitted substantial evidence; and
3. Conditional Use Permit CUP16-562 is approved as recommended and conditioned in Attachment 1 for Case Number CUP16-562.

Adopted after review and consideration of all the evidence on May 17, 2018.

The motion was made by Commissioner _____ and seconded by Commissioner _____.

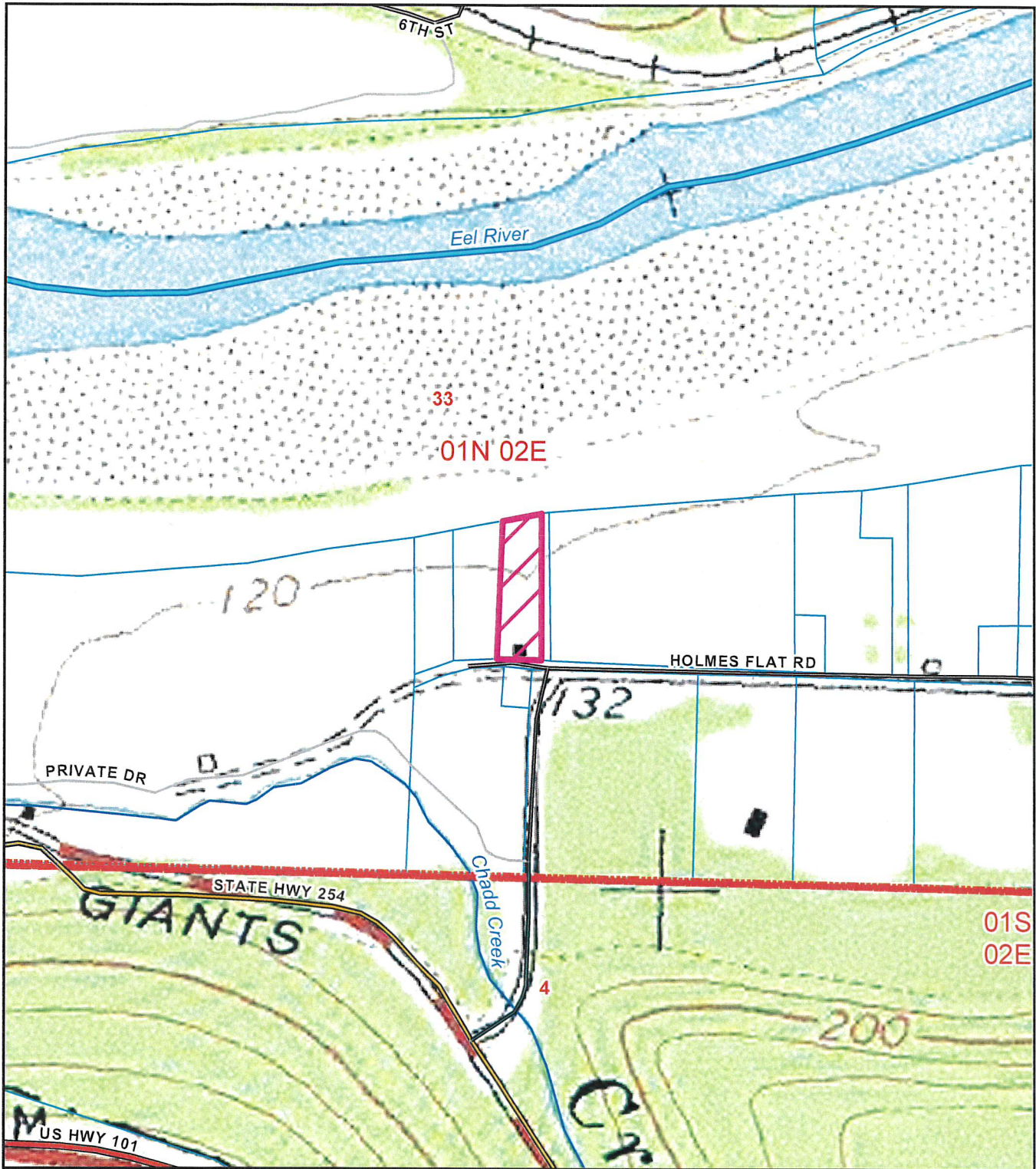
AYES: Commissioners:

NOES: Commissioners:

ABSTAIN: Commissioners:
ABSENT: Commissioners:
DECISION: Motion carries

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.

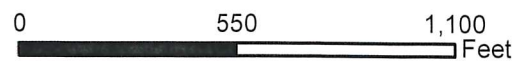
John Ford, Director
Planning and Building Department

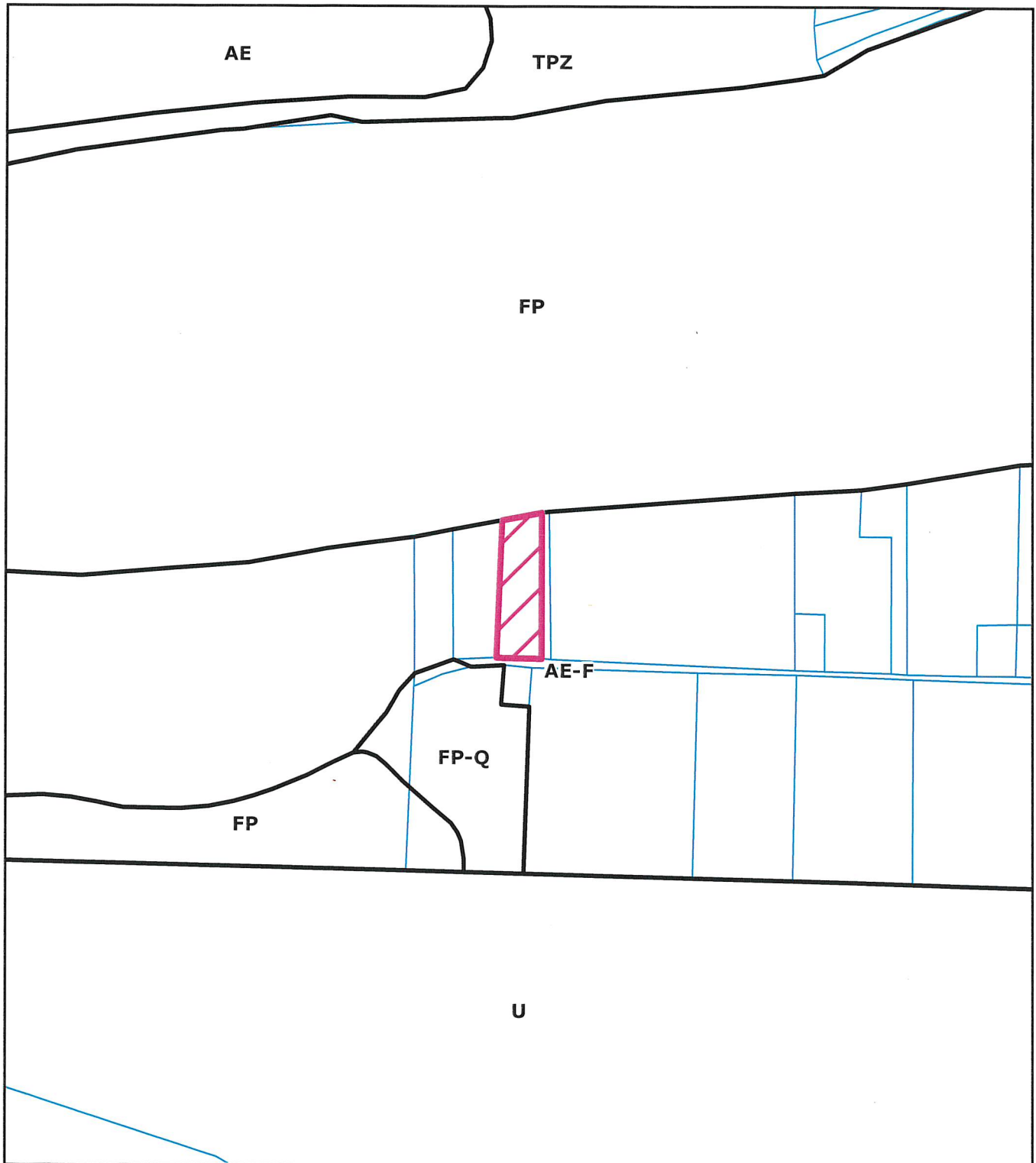


Project Area = 

**TOPO MAP
PROPOSED WHITE FARMS LLC
PEPPERWOOD AREA
CUP-16-562
APN: 209-291-021
T01N R02E S33 HB&M (REDCREST)**

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.





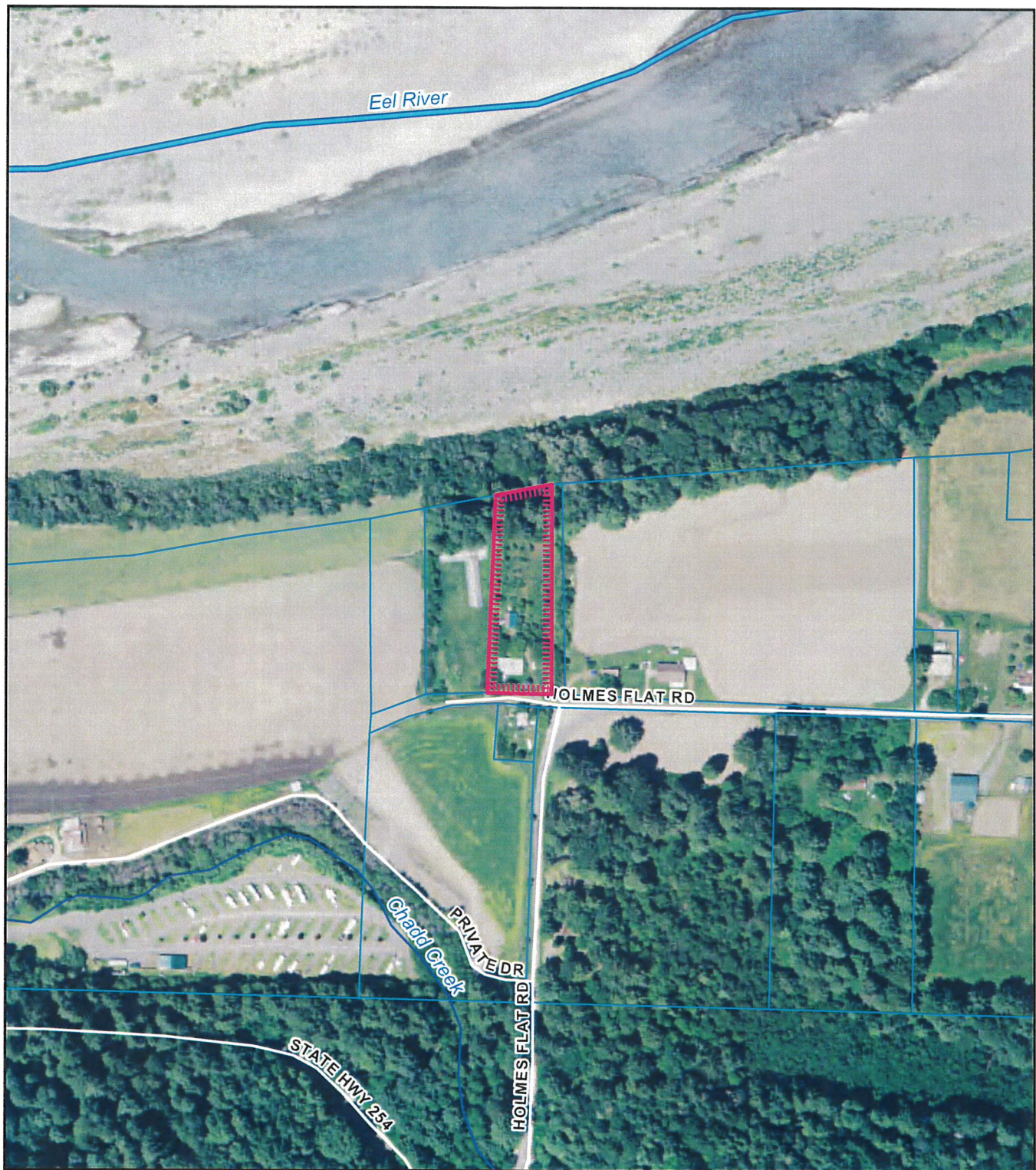
Project Area = 

**ZONING MAP
PROPOSED WHITE FARMS LLC
PEPPERWOOD AREA
CUP-16-562
APN: 209-291-021
T01N R02E S33 HB&M (REDCREST)**



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.

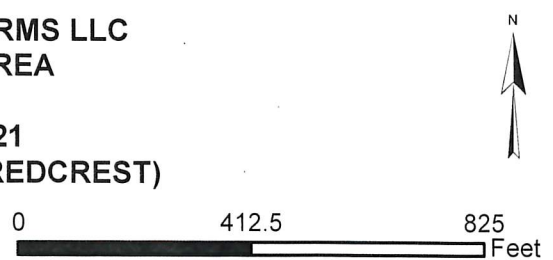




Project Area = 

**AERIAL MAP
PROPOSED WHITE FARMS LLC
PEPPERWOOD AREA
CUP-16-562
APN: 209-291-021
T01N R02E S33 HB&M (REDCREST)**

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.





DIRECTIONS TO SITE:
FROM EUREKA, CA
-TAKE 101 SOUTH
(APPROX. 34.2 MILES)
-TAKE EXIT 671 AND GO LEFT
BARKDULL RD
(APPROX. 0.2 MILES)
-TURN RIGHT ONTO 254
(APPROX. 2.2 MILES)
-TURN LEFT ONTO HOLMES
FLAT RD
(APPROX. 0.2 MILES)
-DESTINATION IS ON THE LEFT

PROJECT DESCRIPTION:

WHITE FARMS, LLC IS PROPOSING TO PERMIT PROPOSED MEDICAL CANNABIS CULTIVATION ACTIVITIES IN ACCORDANCE WITH THE COUNTY OF HUMBOLDT (COUNTY) COMMERCIAL MEDICAL MARIJUANA LAND USE ORDINANCE (CMMLUO), ORDINANCE NO. 2554. THE PROPOSED OPERATION INCLUDES APPROXIMATELY 5,000 SQUARE FEET (SF) OF OUTDOOR MEDICAL CANNABIS CULTIVATION AREA. THE PROJECT PROPOSAL INCLUDES THE DEVELOPMENT OF FACILITIES APPURTENANT TO THE CULTIVATION, INCLUDING GREENHOUSES, FACILITIES FOR DRYING, CURING, GRADING AND TRIMMING OF MEDICAL CANNABIS, WATER DIVERSION WORKS AND APPROPRIATE WATER STORAGE.

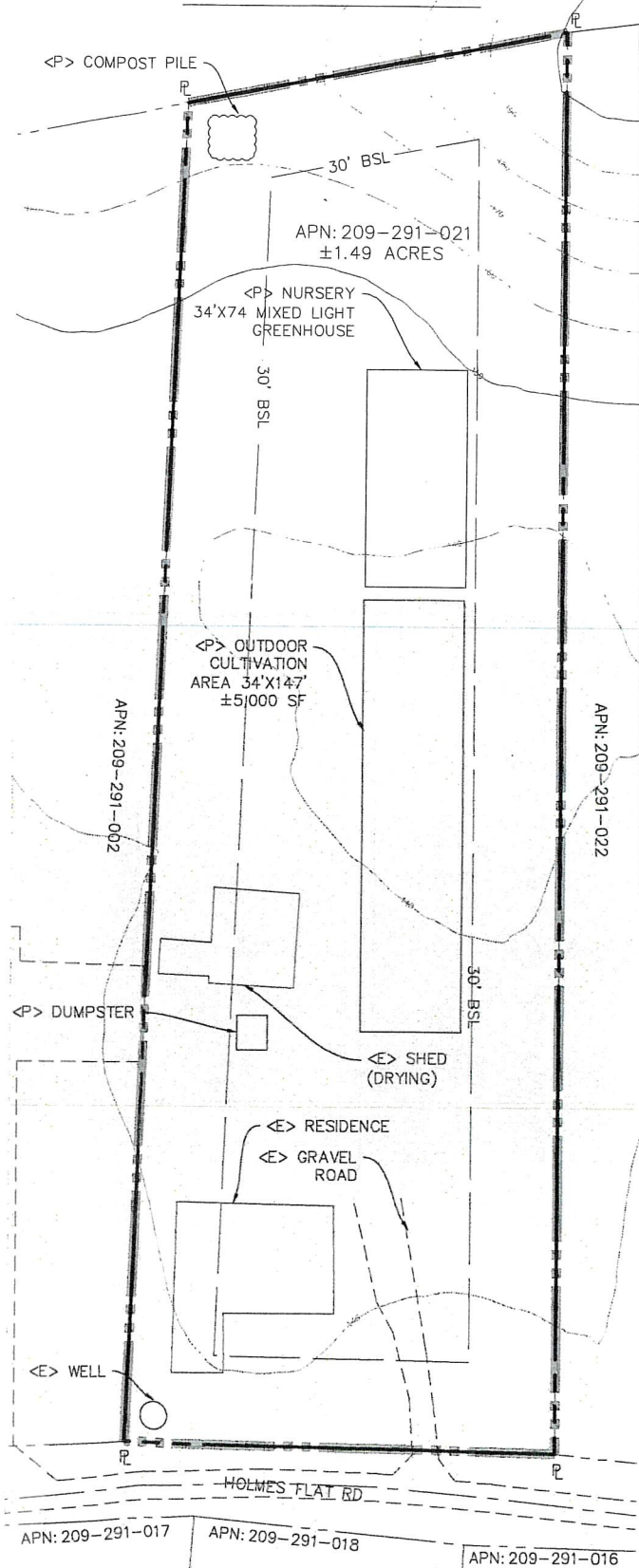
GENERAL NOTES:

1. DRAWING SCALE AS NOTED. WRITTEN DIMENSIONS SHALL TAKE PRECEDENCE OVER SCALED DIMENSIONS.
2. THIS IS NOT A BOUNDARY SURVEY. BOUNDARY INFORMATION DEPICTED HAS BEEN OBTAINED FROM HUMBOLDT COUNTY 2015 GIS DATA. MANHARD CONSULTING LTD. HAS NOT VERIFIED THIS PROPERTY BOUNDARY.
3. THERE ARE NO NEARBY SCHOOLS, SCHOOL BUS STOPS, PLACES OF WORSHIP, PUBLIC PARKS OR TRIBAL RESOURCES WITHIN 600 FEET OF THE PROPOSED CULTIVATION AREA.
4. THERE ARE NO RESIDENCES ON ADJOINING PARCELS WITHIN 300 FEET OF THE PROPOSED CULTIVATION AREAS.
5. ANY EXISTING DEVELOPMENT CONSTRUCTED WITHOUT THE BENEFIT OF COUNTY REVIEW WILL BE SUBJECT TO THE HUMBOLDT COUNTY BUILDING DEPARTMENT UPON APPROVAL OF THE CONDITIONAL USE PERMIT.

WHITE FARMS, LLC

CONDITIONAL USE PERMIT APPLICATION

APN: 209-291-021



PROJECT INFORMATION:

APPLICANT:
WHITE FARMS, LLC
P.O. BOX 347
CUTTEN, CA 95534

PROPERTY OWNER:
JIM WHITE
P.O. BOX 347
CUTTEN, CA 95534

OWNERS AGENT:
MANHARD CONSULTING
517 3RD STREET, SUITE 6
EUREKA, CA 95501
(707) 444-3800

SITE ADDRESS:
APN: 209-291-021
311 HOLMES FLAT RD
REDCREST, CA 95569

TREES TO BE REMOVED = NONE

PRIME AGRICULTURAL AREA = 41,380 SQ. FT
20% OF PRIME AGRICULTURAL AREA = 8,276 SQ. FT

PROPOSED CULTIVATION AREA = 5,000 SQ. FT

EARTHWORK QUANTITIES = TBD

WATER = PRIVATE
SEWER = PRIVATE

PARCEL SIZE = ±1.49 ACRES

ZONING: = AE-F
GENERAL PLAN DESIGNATION = AE (AVES)

BUILDING SETBACKS:

	AE	SRA
FRONT	30'	30'
SIDE	20'	30'
REAR	10'	30'

MAX. BLDG. HT. = NONE SPECIFIED

SRA AREA: = YES
IN COASTAL ZONE: = NO
IN 100 YR FLOOD ZONE: = YES

LEGENDED

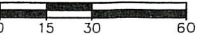
PRIME AGRICULTURAL SOILS
(HUMBOLDT COUNTY GIS)

SHEET INDEX:

C0 - ZONING PLOT PLAN, VICINITY MAP, & PROJECT NOTES

PLOT PLAN

22x34 SHEET: 1"=30'
11x17 SHEET: 1"=60'



MANHARD CONSULTING

517 3rd Street Suite 6 Eureka, CA 95501
Tel: (707) 444-3800 Fax: (707) 444-3800
Email: info@manhardconsulting.com
Civil Engineers • Surveyors • Water Resource Engineers • Wetland & Watershed Engineers
Construction Managers • Environmental Scientists • Landscape Architects • Planners

WHITE FARMS, LLC/ APN:209-291-021

311 HOLMES FLAT RD REDCREST, CA 95569

PLOT PLAN, PROJECT NOTES, AND VICINITY MAP

PROJ. MGR.: POW
PROJ. ASSOC.: SL
DRAWN BY: JWC
DATE: 12/9/16
SCALE: AS SHOWN

SHEET
C0
WHI.RRCA02
© 2016 ALL RIGHTS RESERVED

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 release of the building permit or initiation of operations, whichever occurs first.

Section 1: Development Restrictions

1. The Applicant shall be responsible for obtaining all necessary County and State permits or licenses, and for meeting all of the requirements as set forth by other regulatory agencies.
2. The applicant shall secure permits for all 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 Plot 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.
3. 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.
4. All development in the 100-year flood plain shall comply with the Flood Damage Prevention regulation, Humboldt County Code Section 335-1 et seq. The applicant shall secure and submit a flood elevation certificate from the Building Division prior to any new development activity.
5. The applicant shall improve the driveway from Holmes Flat Road to the subject property to current standards for a commercial driveway. The applicant shall obtain an encroachment permit from the Department of Public Works prior to the commencement of any work. The driveway shall be paved for a minimum width of 20 feet and a length of 50 feet where it intersects the County road. A letter from that agency indicating approval has been issued will satisfy this condition.
6. The applicant shall demonstrate the driveway and emergency vehicle turn around conform with the Humboldt County Code Section 3112-12, the Fire Safe Regulations. The applicant shall be responsible for implementing any necessary improvements to bring the driveway and emergency vehicle turn around into compliance. A letter from a qualified engineer shall satisfy this requirement.
7. The applicant shall supply a copy of the 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.
8. The applicant shall submit at least one legible copy of the final Water Resource Protection Plan (WRPP) to the County Planning and Building Department. The applicant shall implement all corrective actions detailed within the Water Resource Protection Plan (WRPP) developed for the parcel, prepared pursuant to Tier 2 enrollment under the North Coast Regional Water

Quality Control Board (NCRWQCB) Cannabis Cultivation Waste Discharge Regulatory Program, including those measures determined necessary during annual and periodic site inspections in accordance with the monitoring element. A copy of the report form portion of the Mitigation and Reporting Program (MRP) shall be submitted annually to the County Planning and Building Department concurrent with the submittal to the NCRWQCB. A letter or similar communication from the NCRWQCB or the Third Party Consultant verifying that all their requirements have been met will satisfy this condition. [After July 31, 2019, plans and reporting shall conform to the Cannabis Cultivation Policy and Cannabis General Order adopted October 17, 2017 by the State Water Board.]

9. Prior to issuance of any building or construction permits, a revised Cultivation and Operations Plan and Plot Plan shall be prepared by the applicant and reviewed and approved by the County Planning and Building Department showing:
 - a) Adequate off-street parking;
 - b) Compliance with emergency vehicle access requirements to comply with SRA requirements;
 - c) Setbacks of appurtenant structures, and cultivation related composting areas to property lines to comply with SRA requirements; and
 - d) Location and type of additional water storage of at least 2,500 gallons to comply with SRA requirements.
10. Prior to issuance of any building or construction permits, a grading, erosion and sediment control plan shall be prepared by a qualified engineer. The plan shall identify the cubic yards of all grading that has been done and any proposed grading.
11. Prior to any ground-disturbance or the issuance of any permits, a qualified biologist shall survey the project site and identify the locations of all wetlands, springs, seeps, and riparian areas, or plants with a State Rare Plant Rank of 1 or 2. A 150-foot buffer around all identified habitats shall be staked in the field and shown on the revised Plot Plan. No improvements or other activities are allowed within the 150-foot setback area. This shall be reflected in the Cultivation and Operations Plan.
12. Prior to any ground-disturbance, the applicant shall consult with, or obtain a permit as needed from, the North Coast Air Quality Management District (NCAQMD). Dust control practices during construction and grading shall achieve compliance with NCAQMD fugitive dust emission standards.
13. Prior to issuance of any building or construction permit, the applicant shall prove the satisfaction of the County Planning and Building Department that the existing Onsite Wastewater Treatment System (OWTS) is adequate to serve the proposed use and meets applicable standards.
14. The mixed light nursery shall comply with International Dark Sky Association standards for Lighting Zone 0 and Lighting Zone 1, and be designed to regulate light spillage onto neighboring properties resulting from backlight, uplight, or glare (BUG). International Dark Sky Association standards exceed the requirements of Scenic Resources Standard SR-S4, Light and Glare, that lighting be fully shielded, and designed and installed to minimize off-site lighting and direct light within the property boundaries.
15. The use of monofilament netting for all uses, including but not limited for erosion control, shall be prohibited. Geotextiles, fiber rolls, and other erosion control measure materials shall be

made of loose-weave mesh, such as jute, hemp, coconut (coir) fiber, or other products without welded weaves to minimize the risk of ensnaring and strangling wildlife.

16. Should any wildlife be encountered during to work activities, the wildlife shall not be disturbed and be allowed to leave the work site unharmed.
17. All refuse shall be contained in wildlife proof containers, at all times, and relocated to an authorized waste management facility, in compliance with State and local laws, on a regular and on-going basis.
18. Prior to cultivation, the applicant is required to do the following:
 - a. Finalize the LSA Agreement with CDFW regarding the well to determine if the well is jurisdictional;
 - b. Coordinate with the State Water Resources Control Board (SWRCB) to determine if the well is hydrologically connected to the Eel River;
 - c. Submit documentation from CDFW and SWRCB to the Planning Department that the well is non-diversionary; and
 - d. Coordinate with the DEH to evaluate the on-site well. The applicant shall either provide documentation demonstrating legal, non-conforming status of the well, apply for a repair permit, or replace the well under permit. To satisfy this condition, the application shall submit copies of the well permit, well completion log to the Planning Department and a letter from the Department of Environmental Health stating this condition is satisfied.
19. If the well is found to be diversionary, prior to cultivation, the applicant shall submit a revised site plan and cultivation and operations plan to the Planning Department describing a non-diversionary source of water (e.g. rainwater catchment) that is proposed for irrigation and proposed storage.
20. The Property Owner shall execute and file with the Planning Division the statement titled, "Notice and Acknowledgment regarding Agricultural Activities in Humboldt County," ("Right to Farm" ordinance) as required by the HCC and available at the Planning Division.
21. The Applicant shall submit \$50.00 cash or check payable to the Humboldt County Recorder's Office to file the Notice of Exemption pursuant to Section 15062(c) of the CEQA Guidelines.
22. 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.
23. The applicant shall contact the local fire service providers [Redcrest VFD] and furnish written documentation from that agency of the available emergency response and fire suppression services and any recommended project mitigation measures. Mitigation measures shall be incorporated into the project, if applicable. If emergency response and fire suppression services are not provided, the applicant shall cause to be recorded an "ACKNOWLEDGMENT OF NO AVAILABLE EMERGENCY RESPONSE AND FIRE SUPPRESSION SERVICES" for the parcel(s) on a form provided by the Humboldt County Planning Division. Document review fees as set

forth in the schedule of fees and charges as adopted by ordinance of the Humboldt County Board of Supervisors will be required.

24. Greenhouses shall be constructed without improved floors that would preclude agricultural use of the underlying soil in accordance with Humboldt County Code section 314-69.1.1.2.

Section 2: 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 Plot 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. If offsite processing is chosen to be the preferred method of processing, the Applicant shall notify the Department of the identity of the offsite licensed facility. This change will be processed as a Minor Deviation.
2. Cannabis cultivation and other commercial cannabis activity shall be conducted in compliance with all laws and regulations as set forth in the Humboldt County Commercial Medical Marijuana Land Use Ordinance (CMMLUO) and the Medical and Adult Use Cannabis Regulation and Safety Act (MAUCRSA), as may be amended from time to time, as applicable to the permit type.
3. Participate in and bear costs for permittee's participation in the Medical Cannabis Track and Trace Program administered by the Humboldt County Agricultural Commissioner.
4. Possession of a current, valid required license, or licenses, issued by any agency of the State of California in accordance with the MAUCRSA, and regulations promulgated thereunder, as soon as such licenses become available.
5. 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.
6. Maintain enrollment in Tier 1, 2 or 3, certification with the North Coast Regional Water Quality Control Board (NCRWQCB) Order No. R1-2015-0023, if applicable, or any substantially equivalent rule that may be subsequently adopted by the County of Humboldt or other responsible agency.
7. Confinement of the area of cannabis cultivation, processing, manufacture or distribution to the locations depicted on the approved Plot Plan. The commercial cannabis cultivation and processing activity shall be set back at least 30 feet from any property line, and 600 feet from any School, School Bus Stop, Church or other Place of Religious Worship, or Tribal Cultural Resources, except where a reduction to this setback has been approved pursuant to Section 55.4.11(d).

8. At all times, on-site workers 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.
9. Comply with the terms of any applicable Streambed Alteration (1600) Permit obtained from the Department of Fish & Wildlife, which may be required for the proposed well.
10. If required by permit conditions, odors shall be contained on the property on which the Cannabis activity is located. To implement this requirement air filtration and ventilation equipment is to be maintained in good working condition and monitored on an on-going basis to limit potential adverse odor emission impacts to employees and/or properties located in the vicinity of the operation. If the County receives any odor complaints, the permit holder shall work with the Building Official to correct odor concerns.
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, review for conformance with conditions and annual inspection fees.
14. 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.
15. The Master Log Books maintained by the Applicant to track production and sales shall be maintained for inspection by the County.
16. Pay all applicable taxes as required by the Humboldt County Commercial Marijuana Cultivation Tax Ordinance (Humboldt County Code Section 719-1 et seq.).
17. Term of Commercial Cannabis Activity Conditional Use Permit. Any Commercial Cannabis Cultivation CUP issued pursuant to the CMMLUO shall expire after one (1) year after date of issuance, and on the anniversary date of such issuance each year thereafter, unless an annual compliance inspection has been conducted and the permittees and the permitted site have been found to comply with all conditions of approval.

If the inspector or other County official determines that the permittees or site do not comply with the conditions of approval, the inspector shall serve the SP or permit holder with a written statement identifying the items not in compliance, and the action that the permit holder may take to cure the non-compliance, or file an appeal within ten (10) days of the date that the written statement is delivered to the permit holder. Personal delivery or mailing the written statement to the mailing address listed on the application by regular mail, plus three (3) days after date of mailing, shall constitute delivery. The permit holder may request a reinspection to determine whether or not the permit holder has cured all issues of non-compliance. Failure to request reinspection or to cure any items of non-compliance shall terminate the Special Permit, immediately upon the expiration of any appeal period, or final determination of the appeal if an appeal has been timely filed pursuant to section 55.4.13.

18. Acknowledgements to Remain in Full Force and Effect. Permittee Acknowledges that the County reserves the right to reduce the size of the area allowed for cultivation under any clearance or permit issued in accordance with this Section in the event that environmental conditions, such as a sustained drought or low flows in the watershed in which the cultivation area is located will not support diversions for irrigation.

Permittee further acknowledges and declares that:

- (1) All commercial cannabis activity that I, my agents, or employees conduct pursuant to a permit from the County of Humboldt for commercial cultivation, processing, manufacturing, and distribution of cannabis for adult use or medicinal use within the inland area of the County of Humboldt, shall at all times be conducted consistent with the provisions of the approved County permit; and
- (2) All cannabis or cannabis products under my control, or the control of my agents or employees, and cultivated or manufactured pursuant to local Ordinance and the State of California Medicinal and Adult Use Cannabis Regulation and Safety Act ("MAUCRSA") (SB 94), will be distributed within the State of California; and
- (3) All commercial cannabis activity conducted by me, or my agents or employees pursuant to a permit from the County of Humboldt will be conducted in compliance with the State of California MAUCRSA.

Performance Standards for Cultivation and Processing Operations

19. Pursuant to the MAUCRSA, 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."
20. 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).
21. 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.
22. 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:
 - (a) Emergency action response planning as necessary;
 - (b) Employee accident reporting and investigation policies;
 - (c) Fire prevention;
 - (d) Hazard communication policies, including maintenance of material safety data sheets (MSDS);
 - (e) Materials handling policies;
 - (f) Job hazard analyses; and
 - (g) 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:
 - (a) Operation manager contacts;
 - (b) Emergency responder contacts; and
 - (c) 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.

23. 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. Onsite housing, if any.

24. Transfers. Transfer of any leases or permits approved by this project is subject to the review and approval of the Planning Director for conformance with CMMLUO eligibility requirements, and agreement to permit terms and acknowledgments. The fee for required permit transfer review shall accompany the request. The request shall include the following information:

- i. Identification of information for the new Owner(s) and management as required in the initial permit application;
- ii. Acknowledgment, in writing, by the new Owner(s) as required for the initial permit application;
- iii. Inclusion of the specific date on which the transfer is to occur;
- iv. Acknowledgement of full responsibility for complying with the existing Permit; and

v. Execution of an Affidavit of Non-diversion of Medical Cannabis.

25. Inspections. The permit holder and subject property owner are to permit the County or representative(s) or designee(s) to make inspections at any reasonable time deemed necessary to assure that the activities being performed under the authority of this permit are in accordance with the terms and conditions prescribed herein.

Informational Notes:

1. 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 building permits have been secured and/or the use initiated pursuant to the terms of the permit, the use is subject to the Permit Duration and Renewal provisions set forth in Condition of Approval #17 of the On-Going Requirements /Development Restrictions, above.
2. If cultural resources are encountered during construction activities, the contractor on site shall cease all work in the immediate area and within a 50-foot buffer of the discovery location. A qualified archaeologist 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.

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.

3. 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.
4. The Applicant is responsible for costs for post-approval review for determining project conformance with conditions 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 send a bill to the Applicant for all staff costs incurred for review of the project for conformance with the conditions of approval. All Planning fees for this service shall be paid to the Humboldt County Planning Division, 3015 "H" Street, Eureka.
5. A Notice of Exemption (NOE) will be prepared and filed with the County Clerk for this project in accordance with the State CEQA Guidelines. **Within three days of the effective date of permit approval**, it is requested that the applicant submit a check or money order for the required filing fee in the amount of \$50 payable to the Humboldt County Clerk/Recorder. If this payment is not received within this time period, the Department will file the NOE and will charge this cost to the project.

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, Sections 312-1.1.2 and 312-17.1 of the Humboldt County Code (Required Findings for All Discretionary Permits) specify the findings that are required to grant a Conditional Use Permit and 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 midpoint of the density range specified in the plan designation) unless the following written findings are made supported by substantial evidence: 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; and
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 CEQA Guidelines have been made.

Staff Analysis of the Evidence Supporting the 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.

1. The proposed development must be consistent with the General Plan. The following table identifies the substantial evidence which supports finding that the proposed development is in conformance with all applicable policies and standards of the Humboldt County General Plan 2017 and the Avenue of the Giants Community Plan (AVES).

Plan Section	Summary of Applicable Goal, Policy or Standard	Evidence Which Supports Making the General Plan Conformance Finding
<p>Land Use Chapter 4</p> <p>Land Use Designations Section 4.8</p>	<p>Agricultural Exclusive (AE): This plan designation applies to bottomland farms and lands that can be irrigated; also used in upland areas to retain agricultural character. Typical uses include dairy, row crops, orchards, specialty agriculture, and horticulture. Residential subdivision is not supported. Residential uses must support agricultural operation.</p> <p>Avenue of the Giants Community Plan Area (AVES): This plan area is in southern Humboldt County and includes policies to protect resource production land, increase rural densities, provide economic development, and identification of areas of special concern.</p>	<p>The project includes 5,000 square feet (sf) of outdoor medical cannabis cultivation and 2,516 sf of mixed-light appurtenant nursery. Other uses include drying and curing of cannabis. Cannabis will be transported off-site for processing. General and intensive agriculture are allowed use types for this designation.</p> <p>The proposed project is within the Holmes community in the AVES CPA. The proposed project will support the major policies of the AVES and Humboldt County Framework Plan which work in unison. The proposed project will consist of the production of an agricultural crop within an area designated as prime farmland. This is consistent with the history of agricultural production in the AVES CPA and Holmes community. The proposed project will not degrade other environmental resources nor will it preclude future use of any on-site or off-site agricultural land. In addition, it will preserve the existing rural nature of the project site and surrounding land uses. To reduce any potential effects, the proposed project has been conditioned to ensure water for irrigation will be non-diversionary as determined by consultation with CDFW and SWRCB. As such, the proposed project would be consistent with both the General Plan and AVES CPA.</p>

Plan Section	Summary of Applicable Goal, Policy or Standard	Evidence Which Supports Making the General Plan Conformance Finding
Circulation Chapter 7	<p>Goals and policies contained in this Chapter relate to a balanced, safe, efficient, accessible and convenient circulation system that is appropriate for each type of unincorporated community (C-G1, C-G2); coordinated planning design, development, operations, and maintenance between the County and other transportation system service providers (C-G3); and access for all transportation mode types with improved opportunities to move goods within, into and out of Humboldt County. (C-G4, C-G5)</p> <p>Related policies: C-P3, Consideration of Transportation Impacts in Land Use Decision Making</p>	<p>Access to the project site is from a paved and striped County-maintained public road (Holmes Flat Road). Holmes Flat Road connects with State Highway 254 to the south, which connects to Highway 101. An approximate 65-foot dirt/gravel shoulder and driveway provide access to the subject property from Holmes Flat Road. The Department of Public Works requested the driveway from Holmes Flat Road be improved and provided appropriate standards. A Condition of Approval has been added to meet these requirements.</p>
Housing Chapter 8	<p>Goals and policies contained in this Element seek to identify existing and projected housing needs and establish goals, policies, standards and measures for the preservation, improvement, and development of housing.</p> <p>Related policies: H-P3, Development of Parcels in the Residential Land Inventory</p>	<p>The proposed project does not involve residential development, nor is the project site part of the Housing Element, Residential Land Inventory. However, the proposed project will not preclude any future residential development on the project site or adjacent areas. 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.</p>

Plan Section	Summary of Applicable Goal, Policy or Standard	Evidence Which Supports Making the General Plan Conformance Finding
<p>Conservation and Open Space Chapter 10</p> <p>Open Space Section 10.2</p>	<p>Goals and policies contained in this Chapter relate to an Open Space and Conservation Program that is complimentary to other agencies' plans and that preserves the county's unique open spaces (CO-G1, CO-G3)</p> <p>Related policies: CO-P1, Conservation and Open Space Program; CO-P12, Development Review, CO-S1. Identification of Local Open Space Plan, and CO-S2. Identification of the Open Space Action Program</p>	<p>The proposed project is located on a parcel planned Agriculture Exclusive (AE)/ Prime and Non-Prime lands, thus, it is within the Open Space Land Plan. The proposed project, considered an agricultural product, is consistent with the Open Space Plan, Open Space Action because it is consistent with the allowable uses of the Land Use Designations. The proposed project is consistent with the use of Open Space land for management and production of resources. The proposed project is greater than 150 feet from Streamside Management Areas (SMA) and wetlands within and adjacent to the Eel River on the north and Chadd Creek to the south. The proposed project is consistent with the preservation of natural resources within open space.</p>
<p>Conservation and Open Space Chapter 10</p> <p>Biological Resources Section 10.3</p>	<p>Goals and policies contained in this Chapter relate to mapped sensitive habitat areas where policies are applied to protect fish and wildlife and facilitate the recovery of endangered species (BR-G1, Threatened and Endangered Species, BR-G2, Sensitive and Critical Habitat, BR-G3, Benefits of Biological Resources)</p> <p>Related policies: BR-P1. Compatible Land Uses, BR-P5. Streamside Management Areas.</p>	<p>The project site consists of flat topography with less than 10% slopes. The northern half of the property is primarily forested and the remainder of the site is open grassland. A portion of the southern part of the site is occupied by a residence and shed. No trees are proposed to be removed. According to the CDFW Resource Map, the project area is identified as having the potential to contain sensitive plant species. Because the project site has the potential to contain endangered plant species, the applicant is required to conduct a biological survey of the area affected by the proposed project prior to construction. The survey must include focused evaluation for locally-occurring sensitive plant species (mapped occurrences within one (1) mile). The applicant must submit the results of the survey to the County and CDFW. This requirement has been added as a Condition of Approval.</p> <p>To ensure waste is handled appropriately and reduces the impact on biological resources, the project is conditioned on All refuse shall be contained in wildlife proof containers, at all times, and relocated to an authorized waste management facility, in compliance with State and local laws, on a regular and on-going basis.</p>

Plan Section	Summary of Applicable Goal, Policy or Standard	Evidence Which Supports Making the General Plan Conformance Finding
<p>Conservation and Open Space Chapter 10</p> <p>Cultural Resources Section 10.6</p>	<p>Goals and policies contained in this Chapter relate to the protection and enhancement of significant cultural resources, providing heritage, historic, scientific, educational, social and economic values to benefit present and future generations (CU-G1, Protection and Enhancement of Significant Cultural Resources)</p> <p>Related policies: CU-P1. Identification and Protection, CU-P2. Native American Tribal Consultation]</p>	<p>The applicant retained Archeological Research and Supply Company (ARSC) for the preparation of a Cultural Resources Investigation for the project site. ARSC conducted a records search, consulted with the Native American Heritage Commission, local Bear River Band of Rohnerville Rancheria representatives, and Sinkyone Intertribal Wilderness Council. In addition, an intensive field survey of the entire project site was conducted. The Cultural Resources Investigation concluded significant archaeological and/or historic period cultural resources were absent from the study area. Therefore, for the purposes of CEQA, no resources that would be considered an historic resource, are known to exist in the limits of the study. The report made recommendations for inadvertent discovery of archaeological resources. A condition of approval has been incorporated regarding inadvertent discovery protocol to protect cultural resources.</p>
<p>Conservation and Open Space Chapter 10</p> <p>Scenic Resources Section 10.6</p>	<p>Goals and policies contained in this Chapter relate to the protection of scenic areas that contribute to the enjoyment of Humboldt County's beauty and abundant natural resources (SR-G1); and a system of scenic highways roadways that increase the enjoyment of, and opportunities for, recreational and cultural pursuits and tourism in the County. (SR-G2)</p> <p>Related policies: SR-S4. Light and Glare</p>	<p>While the proposed project involves an outdoor cultivation area (5,000 sf), an ancillary propagation nursery (2,516 sf) is proposed that will include lighting. The CMMLUO requires that mixed light cultivation comply with International Dark Sky Association standards for Lighting Zone 0 and Lighting Zone 1, and be designed to regulate light spillage onto neighboring properties resulting from backlight, uplight, or glare (BUG). International Dark Sky Association standards exceed the requirements of Scenic Resources Standard SR-S4, Light and Glare, that lighting be fully shielded, and designed and installed to minimize off-site lighting and direct light within the property boundaries. Compliance with these requirements have been added as conditions of approval to the proposed project.</p>

Plan Section	Summary of Applicable Goal, Policy or Standard	Evidence Which Supports Making the General Plan Conformance Finding
<p>Water Resources Chapter 11</p> <p>Stormwater Drainage</p>	<p>Goals and policies contained in this Chapter relate to coordinated watershed planning and land use decision making to advance management priorities (WR-G3, WR-G4, WR-G5); watershed conservation and restoration efforts aimed at de-listing water bodies and watersheds which are restored to meet all beneficial uses, including water use, salmon and steelhead recovery plans, recreational activities, and the economy. (WR-G1, WR-G2, WR-G7, WR-G8, WR-G9)</p> <p>Related policies: WR-P10. Erosion and Sediment Discharge; WR-42 Erosion and Sediment Control Measures.</p>	<p>The project site falls within Tier 2 of the North Coast Regional Water Quality Control Board's (NCRWQCB) Order No. 2015-0023 (Order), which requires preparation of a Water Resources Protection Plan (WRPP) to protect water quality from cannabis cultivation and related activities. The applicant is currently preparing a WRPP for the project site. The WRPP will identify areas where the project site does not meet Standard Conditions and will set a preliminary schedule prioritizing corrective actions to reach full compliance with the Order. Implementation of the WRPP has been added as a Condition of Approval to the proposed project.</p>
<p>Water Resources Chapter 11</p> <p>Onsite Wastewater Systems</p>	<p>Goals and policies contained in this Chapter relate to adequate public water supply as well as onsite wastewater systems and natural and developed storm drainage systems that minimize interference with surface and groundwater flows and storm water pollution. (WR-G6, WR-G9, WR G10)</p> <p>Related policies: WR-IM7. Basin Plan Septic Requirements; and IS-P17. On-Site Sewage Disposal Requirements.</p>	<p>The residence on the project site is served by an existing septic system. This system will be used by workers on the project site. Prior to issuance of any building or construction permit, the applicant shall prove the satisfaction of the County Planning and Building Department that the existing Onsite Wastewater Treatment System (OWTS) is adequate to serve the proposed use and meets applicable standards. These requirements have been incorporated as conditions of approval.</p>

Plan Section	Summary of Applicable Goal, Policy or Standard	Evidence Which Supports Making the General Plan Conformance Finding
Noise Chapter 13	<p>Goals and policies contained in this Chapter discourage incompatible uses within communities and reduce excessive noise through the application of standards. (N-G1, N-G2)</p> <p>Related policies: N-P1, Minimize Noise from Stationary and Mobile Sources; N-P4, Protection from Excessive Noise</p>	<p>The subject parcel is not located in an area that requires special noise attenuation measures. The proposed project is for outdoor cultivation of medical cannabis with a mixed light nursery. Power to the subject parcel is provided by PG&E and does not require use of generators.</p>
Safety Element Chapter 14 Geologic & Seismic	<p>Goals and policies contained in this Chapter relate to communities that are designed and built to minimize the potential for loss of life and property resulting from natural and manmade hazards; and to prevent unnecessary exposure to areas of geologic instability, floodplains, tsunami run-up areas, high risk wildland fire areas, and airport areas planned and conditioned to prevent unnecessary exposure of people and property to risks of damage or injury. (S-G1, S-G2)</p> <p>Related policies: S-P11. Site Suitability, S-P7. Structural Hazards.</p>	<p>The project site is not located in a mapped Alquist-Priolo fault zone nor is it subject to liquefaction. The proposed cultivation areas will occur on slopes less than 10% and is seismically classified with low instability. The Plot Plans show that earthwork quantities are currently being determined. Given the relatively flat slope of the project site, the proposed project activities are not expected to be affected by geologic instability. The proposed project also does not pose a threat to public safety related from exposure to natural or manmade hazards. The applicant must secure a grading permit which requires the applicant to, at a minimum, incorporate the standard erosion control measures enumerated in the General Plan. These measures are a Condition of Approval.</p>
Safety Element Chapter 14 Flooding	<p>Goals and policies contained in this Chapter relate to the use of natural drainage channels and watersheds that are managed to minimize peak flows in order to reduce the severity and frequency of flooding. (S-G3)</p> <p>Related policies include: S-P12, Federal Flood Insurance Program; S-P13, Flood Plains; S-P15, Construction Within Special</p>	<p>The subject site is within a FEMA mapped 100-year flood zone. The proposed project will not alter the existing flood area, does not propose any new residential or civic uses, and will not result in any hazardous industrial uses within the existing flood zone. Agriculture is an allowable use in flood zones. The proposed project would store for use natural fertilizers including five gallons of roots organic tea, and five gallons of perlite. The proposed project does not propose to use or store within the project site, any pesticides or fungicides. In addition, the applicant does not propose</p>

Plan Section	Summary of Applicable Goal, Policy or Standard	Evidence Which Supports Making the General Plan Conformance Finding
	Flood Hazard Areas	storage of any fuels or oils on the project site. Trash, refuse, and recycling is stored on site and disposed of once per week. Lastly, cultivated vegetation is composted within a designated area on the site, stalks and chips are burned on site, and spent potting soils is remediated and reused. Therefore, the proposed project will not store hazardous or acutely hazardous materials on site that could be cause environmental harm during a flooding even. The proposed project will not place structures in the zone that might endanger life or significantly restrict the carrying capacity of the designated floodway. Lastly, the project site is not within a mapped dam or levee inundation area. The project site is approximately 22 miles east of the coast, and approximately 136 feet above mean sea level, thus, is outside the areas subject to tsunami run-up.
Safety Element Chapter 14 Fire Hazards	Goals and policies of this Chapter encourage development designed to reduce the risk of structural and wildland fires supported by fire protection services that minimize the potential. Related policies: S-P15, Conformance with State Responsibility Areas (SRA) Fire Safe Regulations.	The parcel is in an area of Low Fire rating and within the State Fire Responsibility Area (SRA) where the State of California has the primary financial responsibility for the prevention and suppression of wildland fires. The Humboldt County Fire Safe Ordinance (Section 3111-1 et seq.) establishes development standards for minimizing wildfire danger in SRAs. The applicant is proposing improvements to meet requirements, including a designated fire-turn around that will be required to meet and be approved by the Humboldt County Planning and Building Department. In addition, a pull-out area for emergency vehicles, and maintenance of surrounding vegetation, and maintaining of surrounding vegetation will be completed and is an ongoing condition of approval. All physical structures will meet the 30-foot SRA setback from property lines. There is an attachment on the western side of the drying shed and a compost pile shown in the northwest corner of the project site that are within the 30-foot setback. Conditions of approval to remove these items or move them to inside the 30-foot setback, as well as improving water storage to at least 2,500 gallons have

Plan Section	Summary of Applicable Goal, Policy or Standard	Evidence Which Supports Making the General Plan Conformance Finding
		<p>been added.</p> <p>All applicable referral agencies were referred and did not identify any issues relating to fire hazards.</p>
<p>Safety Element Chapter 14</p> <p>Fire Hazards</p> <p>Implementation Action Plan</p>	<p>IS-S5 requires new industrial, commercial and residential development located outside of fire district boundaries to obtain written acknowledgment of available emergency response and fire suppression services from the local fire agency, including any recommended mitigation.</p>	<p>The project is located outside of the Redcrest Volunteer Fire Department boundary per the 2016 County Fire Plan. The applicant will contact the local fire agency for a written acknowledgment of available emergency response and fire suppression services and recommended mitigations.</p> <p>The project is conditioned to require that the project incorporate any recommended mitigations into the project, and, if service is not available to the site, to record an acknowledgement consistent with this standard.</p>
<p>Air Quality Chapter 15</p>	<p>Goals and policies contained in this Chapter relate to improved air quality to meet current and future state and federal standards, including attainment of particulate matter requirements (AQ-G1, AQ-G2, AQ-G3) and the successful reduction of greenhouse gas emissions to levels consistent with state and federal requirements. (AQ-G4)</p> <p>Related policies: AQ-P4, Construction and Grading Dust Control; AQ-S1, Construction and Grading Dust Control; AQ-P7, Interagency Coordination.</p>	<p>As a condition of approval, applications for grading and or building permits shall be referred to the North Coast Air Quality Management District (NCAQMD) for review and consultation. Dust control practices during construction and grading shall achieve compliance with NCAQMD fugitive dust emission standards.</p>

2. Zoning Compliance and 3. Conforms with 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 That Supports the Zoning Finding
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§312-1.1.2 Legal Lot Requirement	Development permits shall be issued only for a lot that was created in compliance with all applicable state and local subdivision regulations.	The parcel of land known as APN 209-291-021 is Parcel 21 recorded in Book 5 of Parcel Maps Page 5. There is no evidence indicating there have been any subsequent acts to merge or divide this parcel. Therefore, the subject parcel was lawfully created in its current configuration and can be developed as proposed.
§314-7.1 Agriculture Exclusive §314-21.1 Flood Hazard Areas (F)	<p>Agricultural Exclusive (AE): Intended to be applied in fertile areas in which agriculture is and should be the desirable predominate use and in which protection of this use from encroachment from incompatible uses is essential for the general welfare.</p> <p>Flood Hazard Areas (F) combining zone: Minimize public and private losses due to flood and tsunami conditions. Prohibited new Development Within 100-Year Floodway and Floodplain:</p> <ul style="list-style-type: none"> • Mobile home Parks • Health Care Services • Extensive Impact Civic use • Solid Waste Disposal • Hazardous Industrial 	<p>The applicant is seeking a Conditional Use Permit for a new 5,000-square-foot outdoor cannabis cultivation operation with an approximately 2,516-square-foot appurtenant nursery on a property zoned AE-F. The proposed use is specifically allowed with Conditional Use Permit in this zoning district and under Section 314-55.4.8.2.1.2 of the CMMLUO.</p> <p>As discussed above, the entire subject parcel is in the 100-year floodplain as shown on FEMA'S 2016 mapping. The proposed project does not entail any prohibited new development as defined per Section 314-21.1.4.</p>
Minimum Lot Area:	20 acres	1.49 acres
Minimum Lot Width:	100 feet	131 feet
Maximum Lot Depth:	None specified	N/A

Minimum Yard Setbacks:	<p>Front: 30 feet</p> <p>Rear: 30 feet</p> <p>Side: 10% of the lot width on each side but not more than 20 feet shall be required</p> <p>Farm buildings: 20 feet</p>	<p>Front: >30 feet</p> <p>Rear: >30 feet</p> <p>Sides: <30 feet. An attachment to the proposed drying shed is within the 30-foot setback. A condition of approval requiring its removal or relocation has been added.</p> <p>Farm buildings: complies</p>
Maximum Ground Coverage	35%	12%
Max. Building Height	None specified.	N/A
§314-109.1 Off-Street Parking	<p>Off Street Parking for Agricultural use*: Parking space per employee at peak shift. A minimum of three parking spaces are required.</p> <p><i>*Use for this activity is not specified. Per Section 314-109.1.2.9, the Director may fix the required number of parking spaces based on standards for most comparable use.</i></p>	The cultivation operation identifies four (4) employees during peak operations. A requirement for the development of 4 off-street parking spaces has been made a condition of approval.

314-55.4 et seq. HCC: Commercial Cultivation, Processing, Manufacturing and Distribution of Cannabis for Medical Use Inland Land Use Regulation (CMLLUO)

§ 314-55.4.8.2.1.3	On...AE parcels between 1 acre and 5 acres in size, outdoor and mix-light cultivation may be permitted with a Use Permit.	In accordance with the referenced section, the applicant has applied for the CUP due to the parcel being 1.49 acres in size.
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<p>§314-55.4.8.2.1</p> <p>Criteria for approval of new outdoor and mix-light cultivation areas</p>	<p>Slopes less than 15%</p> <p>With documented current water right or other non-diversionary source of irrigation water.</p> <p>Cultivation shall be located on the Prime Agricultural Soils on the parcel and no more than 20 percent of the area of Prime Agricultural soils may be permitted for commercial medical cannabis cultivation.</p>	<p>Per Humboldt County WebGIS, the slopes on the subject parcel do not exceed 15%.</p> <p>Water for irrigation purposes is sourced from an existing unpermitted well. To perfect use of this water source for new cannabis cultivation, the applicant is required to do the following: 1) Notify the California Department of Fish and Wildlife (CDFW) regarding the use of the well to determine if the well is jurisdictional, 2) Coordinate with the State Water Resources Control Board (SWRCB) to determine if the well is hydrologically connected to the Eel River, 3) Submit documentation from CDFW and SWRCB to the Planning Department that the well is non-diversionary and 4) Permit the well with the Humboldt County Department of Environmental Health. If the well is found to be diversionary, the applicant will need to submit a revised cultivation and operations plan to the Planning Department describing a non-diversionary source of water (e.g. rainwater catchment) that is proposed for irrigation. To reduce water use, once the process is complete, the Cultivation and Operations Plan states the irrigation and fertigation of plants will be done using top-feed hand watering methods.</p> <p>Per Humboldt County WebGIS, approximately 0.95 acres of the 1.49-acre subject parcel, or approximately 64%, is prime farmland. Per the applicant, and based on the Plot Plan provided, the proposed cultivation area will occupy approximate 12% of the total prime soil area. The project as proposed is consistent with this standard.</p>
<p>§314-55.4.8.2</p>	<p>In all zones where cultivation is allowed consisting of timberland, the commercial cultivation of cannabis for medical use shall only be permitted within a 3-acre conversion exemption area, or non-timberland open area, subject to the conditions and limitations set forth in this Section.</p>	<p>No trees will be removed as part of the proposed project.</p>

§314-55.4.8.10 Permit Limit	No more than four commercial cannabis activity permits may be issued to a single person, as defined in the referenced section.	According to records maintained by the Department, White Farms, LLC, applicant, has two pending cannabis cultivation permits, including this permit and a Special Permit for an existing outdoor cultivation area on an adjacent parcel. The applicant is entitled to four permits. This application is for one permit.
§314-55.4.9.1 Accessory Processing	Processing for cultivation requiring a Special Permit or Use Permit will be considered in the Use Permit application.	All commercial medical cannabis cultivated will be processed at a licensed off-site location.
§314-55.4.10 Application Requirements	Identifies the Information Required for All Applications	Attachment 3 identifies the information submitted with the application, and shows 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 approval. They are required to be met throughout the timeframe of the permit.
§314-55.4.11.c Performance Standards-Water	Compliance with all statutes, regulations and requirements of the California State Water Resources Control Board, 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.	Water for irrigation purposes is sourced from an existing unpermitted well. Prior to cultivation, the applicant is required to do the following: 1) Notify the California Department of Fish and Wildlife (CDFW) regarding the use of the well to determine if the well is jurisdictional, 2) Coordinate with the State Water Resources Control Board (SWRCB) to determine if the well is hydrologically connected to the Eel River, 3) Submit documentation from CDFW and SWRCB to the Planning Department that the well is non-diversionary and 4) Permit the well with the Humboldt County Department of Environmental Health. If the well is found to be diversionary, the applicant will need to submit a revised cultivation and operations plan to the Planning Department describing a non-diversionary source of water (e.g. rainwater catchment) that is proposed for irrigation. Adherence to the conditions of approval would ensure conformance with this performance standard.

<p>§314-55.4.11.d Performance Standards- Setbacks</p>	<p>The area of cannabis cultivation and on-site processing shall be setback 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 (TCRs).</p>	<p>No response was obtained from the Scotia Union School District or the Fortuna Union High School District to indicate that the cultivation area does not conform to the 600-foot school bus stop setback. The Plot Plan indicated the proposed project complies with this property line setback. There are no parks as defined HCC § Section 314-55.4.7 within 600 feet of the cultivation site based on a review of Humboldt County WebGIS and aerial imagery. There are no places of religious worship within 600 feet. The Cultural Resources Study completed for the project site concluded that Tribal and Cultural Resources are absent. A Condition of Approval regarding inadvertent discovery of such resources has been added.</p>
<p>§314-55.4.11.o Performance Standards- Generator Noise</p>	<p>The noise produced by a generator used for cannabis cultivation shall not be audible by humans from neighboring residences. The combined decibel level for all noise sources, including generators, 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, when generator use is to occur in the vicinity of potential habitat. Conformance will be evaluated using current auditory disturbance guidance prepared by the United State Fish and Wildlife Service</p>	<p>As discussed above the primary power source for the proposed project will be conventional grid power supplied by the PG&E. No generators are proposed for use and no generator associated noise will be produced. Therefore, the proposed project conforms with the referenced standard.</p>

§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 filed the application on December 21, 2016.
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4. Public Health, Safety and Welfare: The following table identifies the evidence which supports finding that the proposed location of the use 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 properties or improvements in the vicinity.

Code Section	Summary of Applicable Requirements	Evidence that Supports the Required Finding
§312-17.1.4	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 Department finds that the proposed project will not be detrimental to the public health, safety and welfare since all reviewing referral agencies have approved the proposed project design. The project as proposed and conditioned is consistent with the General Plan and zoning ordinances; the proposed project is not expected to cause significant environmental damage.

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 shall 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 property was not included in the 2014 Housing Inventory because of the land use designation and zoning. It is developed with a single-family residence which will remain. The proposed project is in conformance with the standards in the Housing Element.

6. Environmental Impact: The following table identifies the evidence which supports finding that the proposed development will not adversely impact the environment.

Code Section	Summary of Applicable Requirements	Evidence that Supports the Required Finding
§§ 15301, 15303 & 15304 of CEQA Guidelines	Categorically exempt from State environmental review.	<p>CEQA Exemption Sections Class 1, 15301 (Existing Facilities), Class 3, 15303 (New Construction or Conversion of Small Structures), and Class 4, 15304 (Minor Alterations to Land), of the State CEQA Guidelines. Per the submitted evidence and agency responses, none of the exceptions to the Categorical Exemption per Section 15300.2 of the State CEQA Guidelines apply to this project.</p> <p>Based on the environmental review of the proposed project staff believes use of CEQA Exemptions including Sections Class 3, 15303 (New Construction or Conversion of Small Structures), and Class 4 (Minor Alterations to Land) are applicable to the proposed project. The proposed project would convert a small shed structure to a different use within the same footprint; and the proposed project includes installation of small new equipment and facilities within a small structure. None of the proposed changes would substantially alter the existing conditions of the land, water, and/or vegetation including trees outside permitted changes such as those needed for compliance with SRA fire prevention. Therefore, these activities are consistent with these exemptions.</p>

ATTACHMENT 3

Applicant's Evidence In Support of the Required Findings

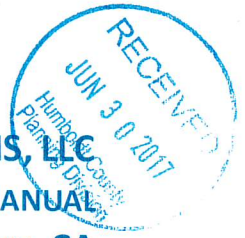
Attachment 3 includes a listing of all written evidence which has been submitted by the applicant in support of making the required findings. The following materials are on file with the Planning Division:

1. The name, contact address and phone number(s) of the applicant. (Application form on file)
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. Plot 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 Plot 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 Plot 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)
4. 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. (Attached)
5. 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)
6. Description of water source, storage, irrigation plan, and projected water usage. (On file)
7. If any onsite 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)
8. If the source of water is a well, a copy of the County well permit, if available. (No log has been produced - conditioned on demonstrating that well is non-jurisdiction)
9. 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. (Not applicable)

10. 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)
11. 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)
12. 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)
13. 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)
14. Cultural Resources Archaeological Research and Supply Company, December 2017 (On file and confidential)
15. DEH Worksheet (On file)

WHITE FARMS, LLC
CULTIVATION AND OPERATIONS MANUAL
HUMBOLDT COUNTY, CA



PROPOSED MEDICAL CANNABIS
CULTIVATION FACILITIES

PREPARED FOR:



June 2017

**Cultivation and Operations Manual
For
WHITE FARMS, LLC**



Proposed Medical Cannabis Cultivation Facilities

Lead Agency:

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June 2017

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1. PROJECT SUMMARY

1.1. PROJECT OBJECTIVE

WHITE FARMS, LLC is proposing to permit proposed medical cannabis cultivation activities in accordance with the County of Humboldt's (County) *Commercial Medical Marijuana Land Use Ordinance* (CMMLUO). The project requires a Conditional Use Permit (CUP) for approximately 5,000 square feet (sf) of outdoor medical cannabis cultivation. The project includes the permitting of existing and proposed facilities appurtenant to the cultivation, including greenhouses, a nursery, and a cultivation facility for drying and curing medical cannabis. The applicant aims to become fully compliant with State and Local cultivation regulations.

1.2. SITE DESCRIPTION

The Project is located at 311 Holmes Road, Redcrest, CA, (APN 209-291-021) just northwest of the community of Redcrest. The subject parcel is approximately 1.49 acres in size (per the County of Humboldt's WebGIS), having relatively flat topography and slopes of less than 10% gradient. The northern half of the property is primarily forest and the rest of the property is open grassland. There is an existing residence and shed onsite.

1.3. LAND USE

The subject property has a General Plan designation of AE (AVES) as identified by the Humboldt County General Plan and is zoned Agriculture Exclusive (AE). The property 41,380 SF of prime agricultural soils according the Humboldt WebGIS. The existing cultivation area occupies less than twelve percent (12%) of the total prime soil area. Land uses surrounding the parcel are comprised of residential, timber and agriculture. The surrounding parcels are zoned Agricultural Exclusive (AE) and Flood Plain (FP).

1.4. STATE AND LOCAL COMPLIANCE

1.4.1. STATE OF CALIFORNIA COMMERCIAL CANNABIS ACTIVITY LICENSE

WHITE FARMS, LLC will obtain a Commercial Cannabis Activity license from the State of California at time such a license becomes available.

1.4.2. STATE WATER RESOURCES CONTROL BOARD

Water for domestic and cultivation uses are provided by a well. Appropriate water rights with the State of California Water Resources Control Board will be filed when they are made available and an initial statement of diversion and use has been filed.

1.4.3. NORTH COAST REGIONAL WATER QUALITY CONTROL BOARD

WHITE FARMS, LLC will enroll with the North Coast Regional Water Quality Control Board (NCRWQCB) for coverage under Tier 2 of Order No. 2015-0023 *Waiver of Waste Discharge Requirements and General Water Quality Certification for Discharges of Waste Resulting from Cannabis Cultivation and Associated Activities or Operations with Similar Environmental Effects in the North Coast Region* (WDID Number TBD).

HUMBOLDT COUNTY BUILDING DEPARTMENT

All necessary building permits will be obtained from the Humboldt County Building Department for all existing and proposed structures and supporting infrastructure upon approval of the Conditional Use Permit.

1.4.4. CAL FIRE

The subject property is located within a State Responsibility Area (SRA) for fire protection. Several improvements are proposed in order to meet SRA requirements, including designating a fire turn-around and pull-out area for emergency vehicles, and management of trees and vegetation around existing structures to maintain the required 100-foot defensible space. All structures on the property meet the 30-foot SRA setback requirement from property lines.

1.4.5. CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

No in-stream work or work within wetland areas is proposed as part of the project. Therefore, a Lake and Streambed Alteration Agreement (LSAA) from the Department of Fish and Wildlife (DFW) is not required.

1.4.6. CULTURAL RESOURCES

If buried archaeological or historical resources are encountered during construction or cultivation activities, the applicant or contractor shall call all work in the immediate area to halt temporarily, and a qualified archaeologist is to be contacted to evaluate the materials. Prehistoric materials may include obsidian or chert flakes, tools, locally darkened midden soils, groundstone artifacts, dietary bone, and human burials. If human burial is found during construction, state law requires that the County Coroner be contacted immediately. If the remains are found to be those of a Native American, the California Native American Heritage Commission will then be contacted by the Coroner to determine appropriate treatment of the remains. The applicant is ultimately responsible for ensuring compliance with this condition.

2. CULTIVATION AND PROCESSING**2.1. PROPAGATION AND INITIAL TRANSPLANT**

Juvenile plants are propagated on site from 'mother plants' that demonstrate the desired genetics for the specific cannabis strain. Mother plants remain in the vegetative stage solely for propagation. Cuttings are sampled from the mother plants and are rooted into a growing medium, typically oasis cubes, to produce 'clones.' The clones are placed into the nursery, and once fully rooted they are transplanted directly into one (1) gallon plastic containers (see Appendix A for nursery location). The juvenile plants are irrigated using hand watering methods. After 6 weeks the clones are then transplanted into beds in an outdoor greenhouse building where they continue their 'vegetative' cycle.

2.2. OUTDOOR CULTIVATION PLAN AND SCHEDULE

The outdoor cultivation will occur in one (1) 34' X 147' for a cultivation area of approximately 5,000 square feet. The greenhouses consist of custom cold frames and some light deprivation tarps. Each greenhouse is ventilated by intake and exhaust fans. The greenhouses produce one (1) flowering cycles per year. The monthly Cultivation Schedule in Appendix C details the cultivation activities associated with the outdoor cultivation operation.

2.3. IRRIGATION PLAN AND SCHEDULE

Irrigation and fertigation of plants occurs using top-feed hand watering methods. WHITE FARMS, LLC maintains that irrigation and fertigation is more efficiently managed via hand watering, allowing for daily inspection of each plant by the cultivator and tailored irrigation and nutrient application depending on the needs of each individual plant. The monthly Cultivation Schedule in Appendix C details the irrigation activities associated with all cultivation.

2.4. HARVESTING, DRYING, AND TRIMMING

Plants that are ready for harvest have their flowering branches removed and suspended in the drying facility which is equipped with ventilation fans. The drying process takes approximately one week.

The dried flowers are then bucked into manageable buds and transported to an off-site processing facility.

2.5. PROCESSING FACILITY

No cannabis processing will occur on site. WHITE FARMS, LLC will contract with a licensed off-site processing facility and/or sell bulk cannabis to a medical cannabis manufacturer.

2.6. EMPLOYEE PLAN

WHITE FARMS, LLC 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), and complies with all applicable federal, state and local laws and regulations governing California Agricultural Employers.

2.6.1. JOB DESCRIPTIONS AND EMPLOYEE SUMMARY

- *Agent in Charge*: Responsible for business oversight and management of the WHITE FARMS, LLC. Responsibilities include, but are not limited to: inventory and tracking, personnel management, record keeping, budget, and liaison with State and County inspectors as needed. This is a part-time, seasonal position.
- *Lead Cultivator*: Oversight and management of the day to day cultivation of medical cannabis. Responsibilities include, but are not limited to: plant propagation and transplant, soil management, irrigation, fertilization, pesticide management, and harvest activities. This is a part-time, seasonal position.
- *Seasonal Laborer*: Provides cultivation and harvesting assistance. This is a part-time, seasonal position.

2.6.2. STAFFING REQUIREMENTS

In addition to the *Agent* and *Lead Cultivator*, up to two (2) full-time seasonal labor positions are employed. The number of seasonal laborers varies based on the needs of the farm during the cultivation, harvest and processing seasons. During the peak harvest and processing season, there are an estimated total of four (4) employees on site.

2.6.3. EMPLOYEE TRAINING AND SAFETY

On site cultivation, harvesting, and drying is performed by employees trained on each aspect of the procedure including: cultivation and harvesting techniques and use of pruning tools; and proper application and storage of pesticides and fertilizers. All cultivation staff are provided with proper hand, eye, body and respiratory Personal Protective Equipment (PPE). Access to the onsite cultivation, drying facilities are limited to authorized and trained staff.

All employees are trained on proper safety procedure including fire safety; use of rubber gloves and respirators; proper hand washing guidelines; and protocol in the event of an emergency. Contact information for the local fire department, CAL FIRE, Humboldt County Sheriff and Poison Control as well as the Agent in Charge will be posted on-site. Each employee is provided with a written copy of emergency procedures and contact information. The material safety data sheets (MSDS) are kept on site and accessible to employees.

2.6.4. TOILET AND HANDWASHING FACILITIES

There will be a permitted septic restroom provided on-site. Anti-bacterial Liquid Soap and paper hand towels will be made available. Employees will work at a distance typically no greater than 250 feet from the restroom facility.

2.6.5. ON SITE HOUSING

There is one existing residence onsite which the property owner will occupy. All employees live off site and commute daily to the cultivation site. No new residential structures are proposed as a part of this project.

2.7. SECURITY PLAN AND HOURS OF OPERATION

2.7.1. FACILITY SECURITY

The cultivation facilities are enclosed in a secure privacy fence. No lighting or surveillance systems will be used.

2.7.2. HOURS OF OPERATION

Activities associated with cultivation in the greenhouses (watering, transplanting, and harvesting) generally occur during daylight hours. All other activities such as processing typically occur no earlier than 7 AM and extend no later than 4 PM.

3. ENVIRONMENT

3.1. WATER SOURCE AND PROJECTED WATER USE

Water for domestic and cultivation uses are provided by a well.

WHITE FARMS, LLC utilizes water management strategies such as handwatering to conserve water use.

The table below outlines the estimated irrigation water usage for cultivation during a typical year. Variables such as weather conditions and specific cannabis strains will have a slight effect on water use.

Table 3.1: Estimated Annual Irrigation Water Usage (Gallons)											
Jan	Feb	Mar	April	May	June	July	Aug	Sept	Oct	Nov	Dec
500	500	500	500	9,000	9,000	9,000	9,000	9,000	9,000	500	500

3.2. WATER STORAGE

There is no water storage on site. Water will be directly diverted to serve for domestic uses and irrigation uses.

3.3. SITE DRAINAGE, RUNOFF, AND EROSION CONTROL

WHITE FARMS, LLC is will enroll with the North Coast Regional Water Quality Control Board (NCRWQCB) for Tier 2 coverage, and a Water Resources Protection Plan (WRPP) has been developed utilizing best management practices (BMP's) in accordance with the NCRWQCB's recommendations.

3.3.1. SITE DRAINAGE AND RUNOFF

The site is very flat with surface flow in the wet season generally draining from the northeast to the residential area to the southwest. There are no stream crossings on the site. The existing and proposed greenhouses are located away from riparian zones. Fertilizers and pesticides are currently stored in a storage shed with secondary containment to prevent contamination with runoff. Sites have been identified for storage/disposal of spoils and cultivation waste.

Cultivation facilities will meet all required setbacks from the nearest water course, providing a sufficient buffer to prevent sediment and nutrient delivery. To further prevent runoff to riparian areas, water conservation and containment measures will be implemented including the use of hand irrigation to prevent excessive water use, and the maintenance of a stable, vegetated buffer between the cultivation area and riparian zone.

3.3.2. EROSION CONTROL

WHITE FARMS, LLC will utilize best management practices including but not limited to:

1. Maintenance of roads, including rocking and armoring.
2. Proper management of solid, liquid and cultivation waste (see section 3.8)
3. Cultivation facilities and spoil stockpiles will meet all required setbacks from riparian and wetland areas.
4. Irrigation and application of fertilizers will be applied at argonomic rates.
5. Regulated products will be safely stored with secondary containment (see section 3.7)

3.4. WATERSHED AND HABITAT PROTECTION

Adherence to the proposed best management practice ensures that the watershed and surrounding habitat are protected. The cultivation activities and associated structures meet all required setbacks from the nearest watercourse, providing a suitable buffer between the cultivation operation and habitat. Additionally, site development and maintenance activities utilize BMP's in accordance with the NCRWQCB's recommendations. Any grading and earthwork activities will be conducted by a licensed contractor in accordance with approved grading permits.

3.5. MONITORING AND REPORTING

Monitoring will be conducted to confirm the effectiveness of corrected measures listed in the Water Resource Protection Plan (WRPP) and determine if the site meets all Standard Conditions. Inspections will include photographic documentation of any controllable sediment discharge sites as identified on the site map. Visual inspection will occur at those locations on the site where pollutants or wastes, if uncontained, could be transported into receiving waters, and those locations where runoff from roads or developed areas drains into or towards surface water. The inspection will also document the progress of any plan element subject to a time schedule, or in the process of being implemented. A monitoring plan is included in the WRPP with photo points identified on WRPP map.

Onsite monitoring shall occur:

- Before and after any significant alteration or upgrade to a given stream crossing, road segment, or other controllable sediment discharge site. Inspection should include photographic documentation, with photo records to be kept on site.
- Prior to October 15 and December 15 to evaluate site preparedness for storm events and stormwater runoff.
- Following any rainfall event with an intensity of 3 inches precipitation in 24 hours. Precipitation data can be obtained from the National Weather Service by entering the site zip code at <http://www.srh.noaa.gov/forecast>.

A Monitoring and Reporting Form (Order No. 2015-0023 Appendix C) will be submitted upon initial enrollment in the Order (NOI) and then annually by March 31 to the Regional Water Board. The annual report will include data from the monitoring reports.

3.6. ENERGY AND GENERATOR USE

On-grid electricity is provided by PG&E for all cultivation and domestic uses.

3.7. USE AND STORAGE OF REGULATED PRODUCTS

3.7.1. BEST MANAGEMENT PRACTICES

Best Management Practices (BMP's) are employed when storing, handling, mixing, application and disposal of all fertilizers, pesticides and fungicides. All nutrients, pesticides and fungicides are located in a locked storage room, and contained within water tight, locked and labeled containers in accordance with manufactures instruction. Application rates will be tracked and reported with the end of the year monitoring report required in the Water Resources Protection Plan (WRPP). Employees responsible for application are trained to handle, mix, apply or dispose of pesticides/fungicides with proper hand, eye body and respiratory protection in accordance with the manufacturer's recommendations. See the WRPP for complete BMP specifications for the use and storage of regulated products.

3.7.2. FERTILIZERS

Nutrients and biological inoculants used for cultivation include:

- Roots Organics Tea – 5 Gallons
- Perlite – 5 Gallons

3.7.3. PESTICIDES AND FUNGICIDES

No pesticides and fungicides are used for cultivation.

3.7.4. FUELS AND OILS

No fuels are oils are stored onsite.

3.8. WASTE MANAGEMENT PLAN

3.8.1. SOLID WASTE MANAGEMENT

Trash and recycling containers are located near the shop in the dumpster. Solid waste and recycling is hauled off-site to the Eel River transfer station at least once per week.

3.8.2. CULTIVATION WASTE AND SOIL MANAGEMENT

Cultivation vegetative matter such as root balls, branches, and leaves are composted at a designated area (see Appendix A). Stalks and chips are burned on site. Spent potting soil is remediated and reused.

3.8.3. WASTEWATER MANAGEMENT

Dripline/Hand watering methods minimize the over-irrigation of plants and subsequent runoff. Moreover, the greenhouse floors are gravel/dirt and will absorb any excess runoff.

4. PRODUCT MANAGEMENT

4.1. PRODUCT TESTING AND LABELING

Samples are selected from individual harvested cannabis strains and are tested by a licensed third-party lab in accordance with State and local standards. The finished product is labeled with the WHITE FARMS, LLC logo, and will include tracking ID's provided by the County of Humboldt and/or Statewide tracking systems once they become available.

4.2. PRODUCT INVENTORY AND TRACKING

Until such time as either a County or Statewide cannabis product and inventory tracking system becomes available, an internally-developed system of inventory and tracking is utilized. The Agent in Charge and Lead Cultivator ensure all medical cannabis from clone to packaged product is tracked, accounted for and inventoried. Records are kept at each phase of the harvest and processing operation for reporting and compliance with State and Local regulations. The information recorded for each harvest includes:

- Cultivation canopy area
- Weight of flowers, by-product, and trim waste after drying and separation
- Weight of buds after trimming
- Product ID numbers and product weight
- Staff identification (at each step)
- Physical location of the plant material at all times

4.3. TRANSPORTATION AND DISTRIBUTION

Transportation will be handled by a third-party, contracted, licensed transporter/distributor in accordance with State and Local regulations. All merchantable product will be distributed through licensed medical cannabis dispensaries. Prior to moving packages from the on-site holding facility to another physical location, a transport manifest will be created by the distributor/transporter and will include:

- Product ID numbers and product weight
- Route to be travelled
- Origin and destination addresses
- Time of departure
- Time of arrival

The *Agent in Charge* and the *Processing Manager* are responsible for performing a physical inventory of all packages being transported, and ensuring that the physical inventory coincides with the transport manifest.

Appendix A: Site Plan

Appendix B: Cultivation Activities Schedule

CULTIVATION ACTIVITIES SCHEDULE

Item	Description	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Pre-cultivation Activities	Propagate cuttings from 'mother plant' stock												
	Transplant cutting into pots												
	Transplant clones into pots or beds												
	Amend soil in greenhouses												
Irrigation Activities	Irrigation of juvenile plants/clones												
	Irrigation of adult plants												
Outdoor Cultivation / Harvest Schedule	Outdoor Cultivation Cycle												
	Harvest activities												
Drying	Drying Activities												
Staffing	Agent in Charge												
Presence	Seasonal Laborers												
Drainage, Runoff, and Erosion Control	Winterization (Storage of pots/greenhouse covers)												
	Temporary Erosion Control BMP's (straw, seeding, fiber rolls, etc.)												
	Road maintenance												
	Culvert and inboard ditch maintenance/inspection												
	Cover soil beds and seed/straw with cover crop												

Appendix C: References

Bass, Ronald E., Kenneth M. Bogdan, and Terry Rivasplata. 2013. CEQA Desktop. Point Arena, CA; Solano Book Press. Page 44.

California Code of Regulations. Health and Safety Code Section 11357-11362.9.

<http://www.leginfo.ca.gov/cgi-bin/displaycode?section=hsc&group=11001-12000&file=11357-11362.9>.> Date accessed: July 16, 2014.

California NORML. SB 420 Establishes Prop. 215 Guidelines, Voluntary Patient Identification Card System.

<http://www.canorml.org/laws/sb420.html>.> Date accessed: July 21, 2014.

County of Humboldt. *Medical Marijuana Land Use Ordinance (MMLUO) – Phase IV, Commercial Cultivation, Processing, Manufacturing and Distribution of Cannabis for Medical Use* (Staff Report to the Board of Supervisors). January 26, 2016. <https://humboldt.legistar.com/Calendar.aspx>.> Date accessed: March 28, 2016.

North Coast Regional Water Quality Control Board. 2016. *Cannabis Cultivation Waste Discharge Regulatory Program*. http://www.waterboards.ca.gov/northcoast/water_issues/programs/cannabis/. Date accessed: March 28, 2016.

State Board of Equalization. Information on the Sales and Registration for Marijuana Sellers. June 2007.

<http://www.boe.ca.gov/news/pdf/173.pdf>.>

State of California. Guidelines for the Security and Non-Diversion of Marijuana Grown for Medical Use. August 2008.

http://www.ag.ca.gov/cms_attachments/press/pdfs/n1601_medicalmarijuanaguidelines.pdf>

ATTACHMENT 4

REFERRAL AGENCY COMMENTS AND RECOMMENDATIONS

The proposed project was referred to the following referral agencies for review and comment. Those agencies that provided written comments are checked off.

Referral Agency	Response	Recommendation	Location
Building Inspection Division	✓	Conditional Approval	On file with Planning
Land Use Division	✓	Conditional Approval	On file with Planning
Division Environmental Health	✓	Conditional Approval	On file with Planning
NWIC	✓	Recommended further study	On file with Planning
Bear River Band of the Rohnerville Rancheria	✓	Conditional Approval	On file with Planning
Intertribal Sinkyone Wilderness Council		No response	
CAL FIRE		Conditional Approval	On file with Planning
Department of Fish & Wildlife		Conditional Approval	Attached
RWQCB		No Response	
Humboldt County Sheriff		No response	
Humboldt County District Attorney		No response	
Humboldt County Agricultural Commissioner		No response	
Fortuna Union High School District		No response	
Scotia Union School District		No response	



**California Department of Fish and Wildlife
CEQA Referral Checklist**

Applicant: White Farms LLC		Date: 4/24/2018	
APPS No.: 12193	APN: 209-291-021	CDFW CEQA: 2017-0441	Case No.: CUP16-562
<input checked="" type="checkbox"/> New <input type="checkbox"/> Existing	<input checked="" type="checkbox"/> Mixed-light (SF): 2,516	<input checked="" type="checkbox"/> Outdoor (SF): 5,000	<input type="checkbox"/> Indoor <input type="checkbox"/> RRR

Thank you for referring this application to the California Department of Fish and Wildlife (CDFW) for review and comment.

CDFW offers the following comments on the Project in our role as a Trustee and Responsible Agency pursuant to the California Environmental Quality Act (CEQA; California Public Resource Code Section 21000 *et seq.*). These comments are intended to assist the Lead Agency in making informed decisions early in the planning process.

- ☐ Recommend Approval. The Department has no comment at this time.
- ☒ Recommend Conditional Approval. Suggested conditions below.
- ☐ Applicant needs to submit additional information. Please see the list of items below.
- ☐ Recommend Denial. See comments below.

Please provide the following information: *(All supplemental information requested shall be provided to the Department concurrently)*

- ☒ If the project is within one mile of a mapped polygon for a California Rare Plant Ranked Species or is located within two miles of ultramafic soils as designated by the United States Geological Survey (USGS), include protocol level surveys for that species by a qualified botanist. See: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline=1>

Please note the following information:

- ☒ Floodplains are an important physical and biological part of riverine ecosystems. All rivers flood, and flooding is a natural and recurring event in river systems. Development in floodplains often eliminates benefits of natural flooding regimes such as deposition of river silts on valley floor soils, and recharging of wetlands. Allowing non-essential development and habitat conversion in floodplains will result in degradation of riverine and riparian habitats and negatively impact the fish and wildlife species that depend upon them. To best protect California's riverine and riparian habitats, CDFW believes it is wise public policy to maintain and restore floodplain functions and to prevent, whenever practicable, the development of residential and commercial structures in areas that are not already protected by existing levee systems. CDFW recommends the project be redesigned to keep permanent structures out of the 100-year floodplain.

- ☒ The project is located in/near Northern Spotted Owl (*Strix occidentalis caurina*, a State- and Federally-Threatened species) potential habitat. CDFW requests, prior to Permit approval, protocol level surveys (two-year) by an experienced wildlife biologist, to determine whether the area has NSO presence; OR assume presence and avoid disturbance of habitat as determined by a qualified biologist, in consultation with CDFW and the US Fish and Wildlife Service.
- ☒ All or part of the Project is located within the CDFW recommended minimum setback area. CDFW recommends that the applicant have a qualified biologist assess the property to delineate the appropriate setbacks (a minimum of 100ft from perennial streams/wetlands and 50ft from intermittent streams), measured from the outer edge of the riparian or top of bank, whichever is greater. These areas should be identified as no-disturbance buffers and future development. CDFW requests confirmation of this setback prior to project approval.
- ☒ CDFW requests, as a condition of Project approval, all Mixed-light (greenhouses and generators) be relocated to stable surfaces with a minimum 200ft buffer from Class I and Class II streams (measured horizontally from the outer edge of the riparian or top of bank, whichever is greater) OR that the project be modified to include only full-sun outdoor.
- ☒ Prohibition on Use of Monofilament Netting. To minimize the risk of ensnaring and strangling wildlife, Permittee shall not use any erosion control materials that contain synthetic (e.g., plastic or nylon) monofilament netting, including photo- or biodegradable plastic netting. Geotextiles, fiber rolls, and other erosion control measures shall be made of loose-weave mesh, such as jute, hemp, coconut (coir) fiber, or other products without welded weaves.
- ☒ Leave Wildlife Unharmd. If any wildlife is encountered during the Authorized Activity, Permittee shall not disturb the wildlife and shall allow wildlife to leave the work site unharmd.
- ☒ The environmental impacts of improper waste disposal are significant and well documented, and clearly contribute to cumulative environmental impacts across the landscape. Significant effects of human refuse on aquatic and terrestrial life include but are not limited to, degradation of habitat, accumulation and transportation of toxic and bioaccumulative chemical pollutants, human dependency, pathogen transmission, increased social aggression, and physical hazards such as entanglement and ingestion, both of which may be lethal. CDFW requests, as a condition of Permit approval, that all refuse be contained in wildlife proof storage containers, at all times, and relocated to an authorized waste management facility, in compliance with State and local laws, on a regular and ongoing basis. All refuse shall be removed from the site and properly disposed of, at the close of the cultivation season and/or when the parcel is no longer in use.
- ☒ The applicant submitted a Notification of Lake or Streambed Alteration (LSA#: 1600-2017-0892). As of April 2018, the LSA Agreement is in process and has not been deemed Final.

- ☒ This project has the potential to affect sensitive fish and wildlife resources such as Maple-leaved Checkerbloom (*Sidalcea malachroides*), Northern Spotted Owl (*Strix occidentalis caurina*), Chinook Salmon (*Oncorhynchus tshawytscha*), Coho Salmon (*O. kisutch*), Steelhead Trout (*O. mykiss*), Green Sturgeon (*Acipenser medirostris*), Pacific Lamprey (*Entosphenus tridentatus*), Foothill Yellow-legged Frog (*Rana boylei*), Pacific Giant Salamander (*Dicamptodon tenebrosus*), Southern Torrent Salamander (*Rhyacotriton variegatus*), Northern Red-legged Frog (*Rana aurora*), Tailed Frog (*Ascaphus truei*), Western Pond Turtle (*Actinemys marmorata marmorata*), and amphibians, reptiles, aquatic invertebrates, mammals, birds, and other aquatic and riparian species.

Thank you for the opportunity to comment on this Project. Please send all inquiries regarding these comments to kalyn.bocast@wildlife.ca.gov.

Please confirm that you have received this email.

Sincerely,

California Department of Fish and Wildlife
619 2nd Street
Eureka, CA 95501