



**COUNTY OF HUMBOLDT**  
**PLANNING AND BUILDING DEPARTMENT**  
**CURRENT PLANNING DIVISION**

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Hearing Date: July 1, 2021

To: Humboldt County Planning Commission

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

Subject: **Bosim 4373, LLC, Conditional Use Permit**  
Record Number: PLN-2020-16405  
Assessor's Parcel Number: 511-321-031  
4373 Central Ave, McKinleyville Area

<b>Table of Contents</b>	<b>Page</b>
Agenda Item Transmittal	2
Recommended Action and Executive Summary	3
Draft Resolution	5
Maps	
Topo Map	9
Zoning Map	10
Aerial Map	11
Site Plans	12
Attachments	
Attachment 1: Recommended Conditions of Approval	13
Attachment 2: Applicant's Evidence in Support of the Required Findings	14
Attachment 3: Referral Agency Comments and Recommendations	37

Please contact Megan Acevedo, Planner I, at 707-441-2634 or by email at [macevedo@co.humboldt.ca.us](mailto:macevedo@co.humboldt.ca.us), if you have any questions about the scheduled public hearing item.

## AGENDA ITEM TRANSMITTAL

Hearing Date	Subject	Contact
July 1, 2021	Conditional Use Permit	Megan Acevedo

**Project Description:** A Conditional Use Permit for a modification of the existing 10,000 ft<sup>2</sup> of cannabis cultivation that was approved under Application No. 12642. The Modification will alter the existing 10,000 ft<sup>2</sup> of mixed-light commercial cannabis cultivation to 6,660 ft<sup>2</sup> of a commercial nursery, and 3,552 ft<sup>2</sup> of mixed-light cultivation. Water for irrigation will be supplied by the McKinleyville Community Service District. Anticipated annual water usage for the project is 90,000 gallons, and watering is done through a drip irrigation system with supplemental hand watering. Total water storage on-site is 1,000 gallons within one 1,000-gallon water tank. Power is supplied by PG&E. A total of five (5) employees will be used for cultivation activities, and processing will be done at an off-site licensed processing facility.

**Project Location:** This project is located in Humboldt County, in the McKinleyville area, on the northeast side of Central Ave, approximately 4,100 feet southeast from the intersection of Central Ave and Highway 101, on the property known as 4373 Central Ave.

**Present Plan Land Use Designations:** Residential Agriculture: 5 to 20 acres (RA5-20), Density: 5 to 20 acres per unit, Airport Safety Review (AP), Density: Must comply with most recent Airport Land Use Compatibility Plan (ALUCP), 2017 General Plan, Slope Stability: Low Instability (1) and Moderate Instability (2).

**Present Zoning:** Agricultural General (AG), Minimum building site area is 5 acres (B-5(5)), Airport Safety Review (AP), Streamside Management Area & Wetland (WR); Agricultural General (AG), Minimum building site area is 5 acres (B-5(5)), Qualified (Q), Airport Safety Review (AP), Streamside Management Area & Wetland (WR).

**Record Number:** PLN-2020-16405

**Assessor's Parcel Number:** 511-321-031

### Applicant

Bosim 4373, LLC  
1551 Nursery Way  
McKinleyville, CA 95519

### Owner

McKinleyville Central Ave, LLC  
324 S Beverly Dr. #727  
Beverly Hills, CA 90212

### Agents

Culture Management  
Gino Granados  
1551 Nursery Way  
McKinleyville, CA 95518

**Environmental Review:** The project is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) per Class I, 15301 (Existing Facilities) of the State CEQA Guidelines.

**State Appeal Status:** Project is NOT appealable to the California Coastal Commission

**Major Issues:** None

**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 that the Commission has considered the Addendum to the adopted Environmental Impact Report for the Commercial Cannabis Land Use Ordinance (CCLUO) as described by Section §15164 of the State CEQA Guidelines, make all of the required findings for approval of the Conditional Use Permit and adopt the Resolution approving the Bosim 4373, LLC Conditional Use Permit as recommended by staff subject to the recommended conditions.*

**Executive Summary:** A Conditional Use Permit for a modification of the existing 10,000 ft<sup>2</sup> of cannabis cultivation that was approved under application 12642. The Modification will alter the existing 10,000 ft<sup>2</sup> of mixed-light commercial cannabis cultivation to 6,660 ft<sup>2</sup> of a commercial nursery, and 3,552 ft<sup>2</sup> of mixed-light cultivation. Water for irrigation will be supplied by the McKinleyville Community Service District. Anticipated annual water usage for the project is 90,000 gallons, and watering is done through a drip irrigation system with supplemental hand watering. Total water storage on-site is 1,000 gallons within one 1,000-gallon water tank. Power is supplied by PG&E. A total of five (5) employees will be used for cultivation activities, and processing will be done at an off-site licensed processing facility. The commercial nursery will be for wholesale.

All activities will occur within the existing structure that was originally built for orchid production over twenty years ago. The structure has an impermeable floor and a permanent roof. There will be a total of five (5) employees used on-site, and the applicant will provide ADA portable toilets and hand washing stations.

The project is simply altering the cultivation operations of the already approved permit within the existing structure (under application 12642), and all of the proposed changes are less intensive than what was previously approved. As no changes are being made that would intensify the impacts of the project to the surrounding environment, the project may be authorized to continue operations that were permitted under the requirements of the Commercial Medical Marijuana Land Use Ordinance (CMMLUO) per Section 313-131.5 for Non-Conforming Use within the Humboldt County Zoning Code.

**Water Resources**

The site is currently served by the McKinleyville Community Services District (MCSD), and a Will-Serve letter is on-file showing the allowance for the continued use of 90,000 gallons per year. There is one (1) 1,000-gallon hard tank on-site, and the project is not required to add additional water storage.

The existing structure and cultivation activities allow the applicant to file for a Conditional Exemption for Indoor cultivation activities (within a fully enclosed structure) with the State Water Resources Control Board (SWRCB), as required under the General Order. There is one Class II stream, Strawberry Creek, which runs through the northern section of the parcel, and there is an additional Class III stream that is within 50-feet of the existing structure. Since the operation is considered indoor with the Water Board, the site meets the setback requirements for all streamside management areas on-site.

**Biological Resources**

As the modified project will be utilizing the pre-existing structure that was approved under Application No. 12642, and the minor change in on-site activities will not result in increased impacts to surrounding wildlife, the project has been determined to have less-than significant effects on biological resources.

## **Energy Plan**

The project is currently powered by PG&E grid connection.

## **Tribal Cultural Resource Coordination**

The project is located within the Wiyot, Blue Lake, and Bear River ancestral aboriginal tribal territories. The previous Application No. 12642 was referred to the Wiyot tribe, Blue Lake Rancheria, and the Bear River Band tribe for referral. A site visit was conducted on April 11, 2017 with the Bear River Band THPO and Wiyot THPO, which revealed no obvious cultural resources on the property. The Wiyot THPO, Bear River Band THPO, and Blue Lake Rancheria THPO all requested that Inadvertent Discovery Protocols be required for the project, which was included in the Conditions of Approval for the approved project under Application No. 12642.

## **Access & Parking**

Access to the site is off of Central Avenue, which is a county maintained road that meets Category 4 road standards. The approved project under Application No. 12642 was referred to the Department of Public Works. Comments from the Department stated that the driveway apron (encroachment) that connects to the County road meets County standards and no improvements to the encroachment are necessary.

With a total of five (5) employees commuting to the site per day, and a maximum of six deliveries anticipated per month there will be a maximum to twelve (12) trips per day. It has been determined that the access road meets the functional capacity required for the project needs.

## **Willow Creek Community Planning Area**

The CCLUO requires a Conditional Use Permit for all commercial cannabis activities in certain community planning areas, including the McKinleyville Community Plan. In accordance with the procedures of the CCLUO a Notice of Application was sent to surrounding property owners within 1000 feet of the site in March of 2021. Two public comments were received in the form of a phone call. Both callers were the property owners of the adjacent parcels to the east and to the west of the subject parcel. Both callers were mainly concerned about the effects of the proposed project on their property values. Other concerns included noise pollution and the potential for water storage bursting and causing flood issues. The callers were made aware that the applicant had already received a permit for the cultivation of cannabis at the site, and that the modification to the approved project should not result in the increase of noise pollution. As well, the applicant has removed several water tanks that were previously existing on the site, and there is no potential hazard for flooding.

Environmental review for this project was conducted and based on the results of that analysis, staff believes the proposed cultivation within an existing structure for the project can be considered "Existing Facilities" as defined by Section 15301 of the California Environmental Quality Act (CEQA) Guidelines. This facility is existing and no changes or alterations are proposed.

**RECCOMENDATION:** 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 approval of the Conditional Use Permit (CUP). The Planning and Building Department believes that the project may be found categorically exempt from environmental review pursuant to Section 15301 of CEQA guidelines.

**ALTERNATIVES:** The Planning Commission could elect not to approve the project, or to require the applicant to submit further evidence, or modify the 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 staff has stated that the required findings in support of the proposal have been made. Consequently, Planning staff does not recommend further consideration of any alternative.

**RESOLUTION OF THE PLANNING COMMISSION  
OF THE COUNTY OF HUMBOLDT  
Resolution Number 21 -  
Record Number PLN-2020-16405  
Assessor's Parcel Number: 511-321-031**

Resolution by the Planning Commission of the County of Humboldt certifying compliance with the California Environmental Quality Act and conditionally approves the Bosim 4373, LLC, Conditional Use Permit.

**WHEREAS, Bosim 4373, LLC**, submitted an application and evidence in support of approving a Conditional Use Permit for a modification of the existing approved project (Application No. 12642) to alter the existing 10,000 ft<sup>2</sup> of mixed-light commercial cannabis cultivation to 6,660 ft<sup>2</sup> of a commercial nursery, and 3,552 ft<sup>2</sup> of mixed-light cultivation within the McKinleyville Community Planning Area;

**WHEREAS**, the project is exempt from environmental review per Section 15301 (Existing Facilities) of the CEQA Guidelines; and

**WHEREAS**, the Humboldt County Planning Commission held a duly-noticed public hearing on July 1, 2021, and reviewed, considered, and discussed the application for a Conditional Use Permit and reviewed and considered all evidence and testimony presented at the hearing.

**Now, THEREFORE BE IT RESOLVED**, that the Planning Commission makes all the following findings:

- 1. FINDING:**                      **Project Description:** A Conditional Use Permit for a modification of the existing 10,000 ft<sup>2</sup> of cannabis cultivation that was approved under Application No. 12642. The Modification will alter the existing 10,000 ft<sup>2</sup> of mixed-light commercial cannabis cultivation to 6,660 ft<sup>2</sup> of a commercial nursery, and 3,552 ft<sup>2</sup> of mixed-light cultivation. Water for irrigation will be supplied by the McKinleyville Community Service District. Anticipated annual water usage for the project is 90,000 gallons, and watering is done through a drip irrigation system with supplemental hand watering. Total water storage on-site is 1,000 gallons within one 1,000-gallon water tank. Power is supplied by PG&E. A total of five (5) employees will be used for cultivation activities, and processing will be done at an off-site licensed processing facility. The commercial nursery will be for wholesale.

**EVIDENCE:**                      a) Project File: PLN-2020-16405
- 2. FINDING:**                      **CEQA.** The project has been determined to be categorically exempt from State environmental review per Section 15301 of CEQA Guidelines (Existing Facilities).

**EVIDENCE:**                      a) The project will consist of the repair, maintenance, permitting, licensing, or minor alteration of existing private structures or facilities involving negligible or no expansion of use.

    b) The project is served by public water from the McKinleyville Community Services District.

    c) The project will result in negligible or no expansion of existing or former use.

    d) The project is served by public power with PG&E.

    e) The project is accessed by Central Avenue which is county maintained, and no improvements are required.

## **FINDINGS FOR CONDITIONAL USE PERMIT**

- 3. FINDING** The proposed development is in conformance with the County General Plan, Open Space Plan, and the Open Space Action Program.
- EVIDENCE**
- a) General agriculture is a use type permitted in the Residential Agricultural (RA) land use designation. The proposed cannabis cultivation, an agricultural product, is within land planned and zoned for agricultural purposes, consistent with the use of Open Space land for managed production of resources. The use of an agricultural parcel for commercial agriculture is consistent with the Open Space Plan and Open Space Action Program. Therefore, the project is consistent with and complimentary to the Open Space Plan and its Open Space Action Program.
- 4. FINDING** The proposed development is consistent with the purposes of the existing AG zone in which the site is located.
- EVIDENCE**
- a) The Agricultural General or AG zone is intended to be applied to areas of the County in which general agriculture residential uses are the desirable predominant uses.
  - b) All general agricultural uses are principally permitted in the AG zone.
  - c) Humboldt County Code section 55.4.6.1.2 (a) allows cultivation of up to 10,000 square feet of new cannabis cultivation on a parcel between 5 and 10 acres subject to approval of a Special Permit. The application to allow a total of 3,552 ft<sup>2</sup> of mixed-light cultivation and 6,660 ft<sup>2</sup> of nursery cultivation on a 5.87-acre parcel is consistent with this and with the cultivation area verification prepared by the County.
  - d) Humboldt County Code section 55.4.7.1 allows nurseries within Agriculture Exclusive (AE) zoning with a Zoning Clearance Certificate. The application to allow a total of 3,552 ft<sup>2</sup> of mixed-light cultivation and 6,660 ft<sup>2</sup> of nursery cultivation on a 5.87-acre parcel is consistent with this and with the cultivation area verification prepared by the County.
- 5. FINDING** The proposed development is consistent with the requirements of the CCLUO Provisions of the Zoning Ordinance.
- EVIDENCE**
- a) The CCLUO allows cannabis cultivation to be permitted in areas zoned AG (HCC 314-55.4.6.1.1).
  - b) Per Section 55.4.7.1, nursery facilities are allowed within Agriculture Exclusive (AE) zoning with a Zoning Clearance Certificate.
  - c) Per Section 313-131.5 for Non-Conforming Use within the Humboldt County Zoning Code, the alteration of the existing project does not need to meet all performance standards set forth within the CCLUO, and can continue operating under the requirements of the approved application 12642 under the CMMLUO.
  - d) The subject parcel is a legal parcel per Parcel Map PM 1711, 15PM24.
  - e) The project will obtain water from a non-diversionary water source. The McKinleyville Community Services District will provide the irrigation water for the project.

- f) The project is located off of Central Avenue, which is a county maintained road developed to a Category 4 road standard. The driveway apron that connects to the County road meets County standards and no improvements to the encroachment are necessary.
- g) The slope of the land where cannabis will be cultivated is less than 15%. Cannabis will be cultivated on existing flats which do not require permitting.
- h) The cultivation of cannabis will not result in the net conversion of timberland. No timber conversion has occurred on the site and no tree removal is proposed for the project. No timber conversion report or permit is required for the project.

## 6. FINDING

The cultivation of 3,552 square feet of mixed-light cannabis cultivation and 6,660 square feet of nursery cultivation on-site and the 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.

### EVIDENCE

- a) The applicant is requesting a Conditional Use Permit to alter the existing approved project to allow 3,552 ft<sup>2</sup> of mixed-light cannabis cultivation and 6,660 ft<sup>2</sup> of nursery cannabis cultivation located within the McKinleyville Community Planning Area.
- b) The site is located within the McKinleyville Community Planning Area. The proposed project was noticed on March 15, 2021 to all parcels within 1,000 feet of the perimeter of the parcel on which the permit is being requested. Two public comments were received in the form of a phone call. Both callers were property owners of the adjacent parcels. One of the callers was concerned about run-off and noise issues. The project will be within the fully enclosed structure and run-off should not be an issue. An annual inspection was recently conducted, noise levels were measured which showed that the applicant is within the limits of the approved permit. The second caller was mainly concerned about property values decreasing, and had mentioned that they were concerned about the possibility that water tanks could fail and cause flooding. The applicant has removed the majority of water tanks that previously existed on the property, and there is no potential for flooding caused by the water tanks. The site already has an approved cannabis operation, and no changes are anticipated to increase the project effects on the surrounding environment, and the modified project will continue to operate under the requirements of the CMMLUO.
- c) The site is located off of Central Avenue, which is county maintained. The driveway apron (encroachment) that connects to the County road meets County standards and no improvements to the encroachment are necessary.
- d) Irrigation water will come from the McKinleyville Community Services District, and the applicant has a will-serve letter.

## 7. FINDING

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.

### EVIDENCE

- a) The parcel was not included in the housing inventory of Humboldt County's 2019 Housing Element but does have the potential to support one housing unit. The approval of cannabis cultivation on this parcel will not conflict with the ability for a residence to be constructed on this parcel.

## DECISION

**NOW, THEREFORE,** based on the above findings and evidence, the Humboldt County Planning Commission does hereby:

- Adopt the findings set forth in this resolution; and
- Conditionally approves the Conditional Use Permit for Bosim 4373, LLC, based upon the Findings and Evidence and subject to the conditions of approval attached hereto as Attachment 1 and incorporated herein by reference; and

Adopted after review and consideration of all the evidence on July 1, 2021.

The motion was made by COMMISSIONER \_\_\_\_\_ and second by COMMISSIONER \_\_\_\_\_ and the following ROLL CALL vote:

AYES: COMMISSIONERS:

NOES: COMMISSIONERS:

ABSENT: COMMISSIONERS:

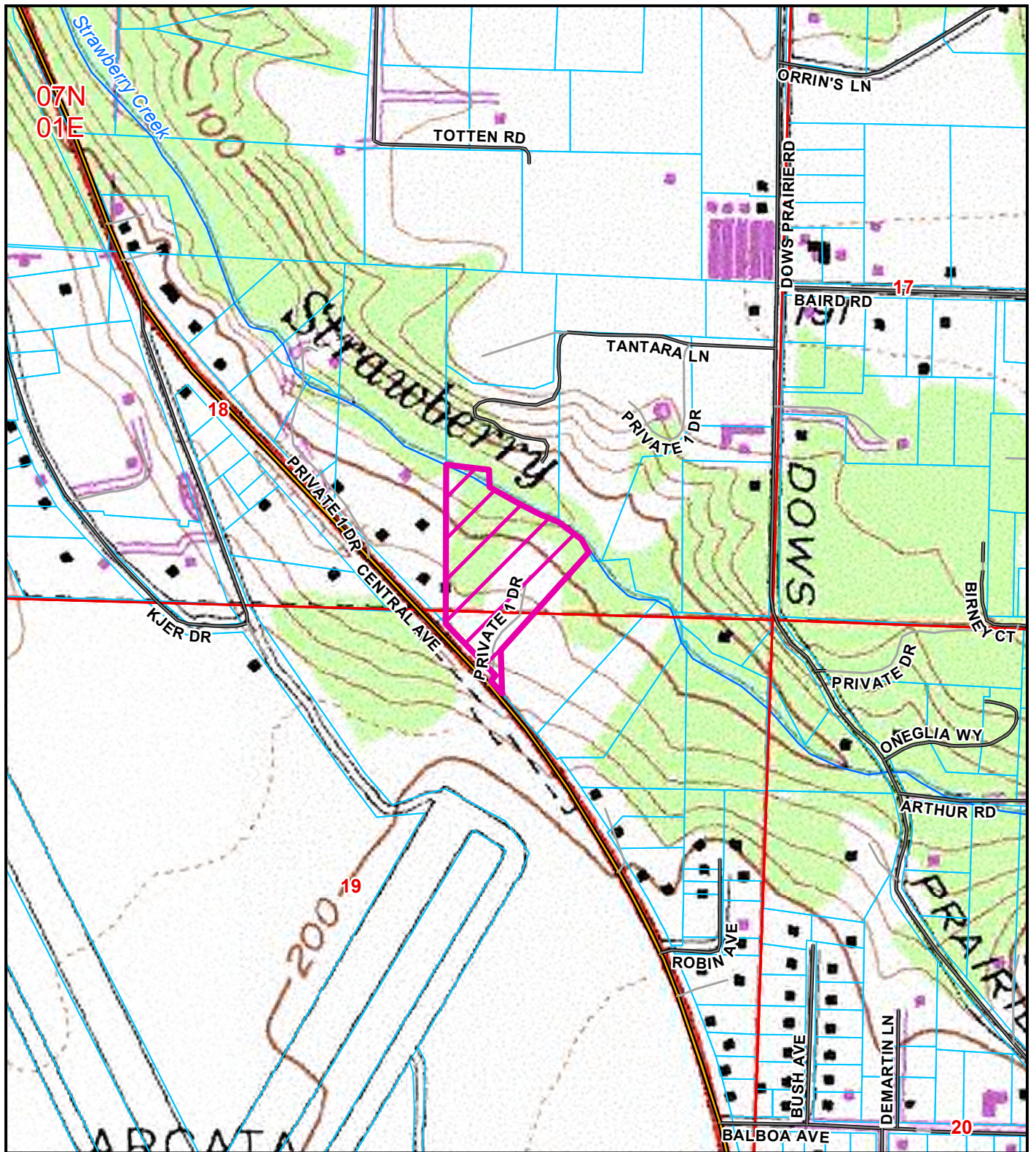
ABSTAIN: COMMISSIONERS:

DECISION:

I, John Ford, Secretary to the Planning Commission of the County of Humboldt, do hereby certify the foregoing to be a true and correct record of the action taken on the above entitled matter by said Commission at a meeting held on the date noted above.

\_\_\_\_\_  
John Ford, Director  
Planning and Building Department



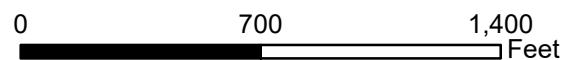


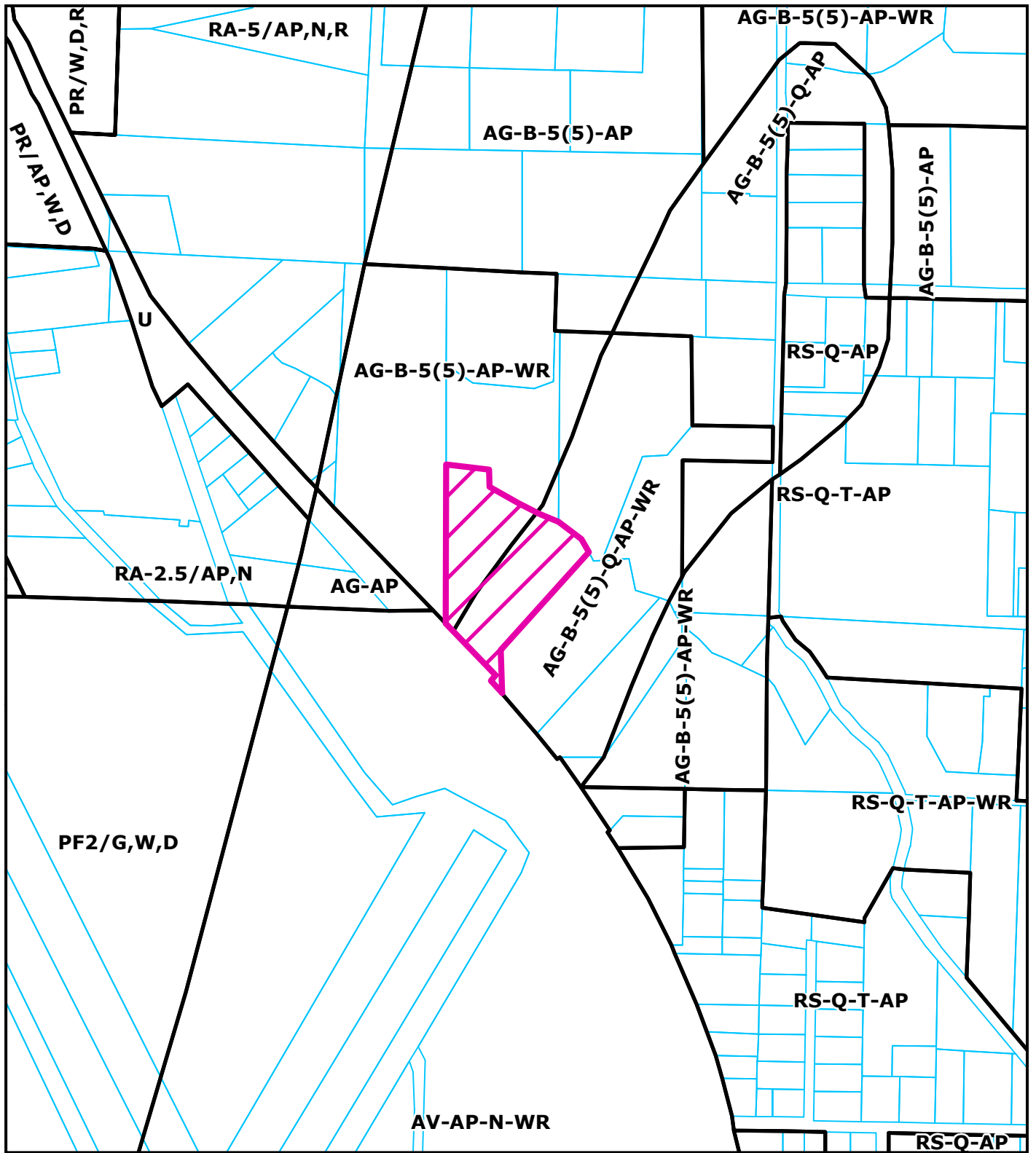
Project Area = 

**TOPO MAP**  
**PROPOSED BOSIM 4373 LLC**  
**MCKINLEYVILLE AREA**  
**PLN-2020-16405**  
**APN: 511-321-031**

**T07N R01E S18; S19 HB&M (ARCATA NORTH)**

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 BOSIM 4373 LLC  
MCKINLEYVILLE AREA  
PLN-2020-16405  
APN: 511-321-031**

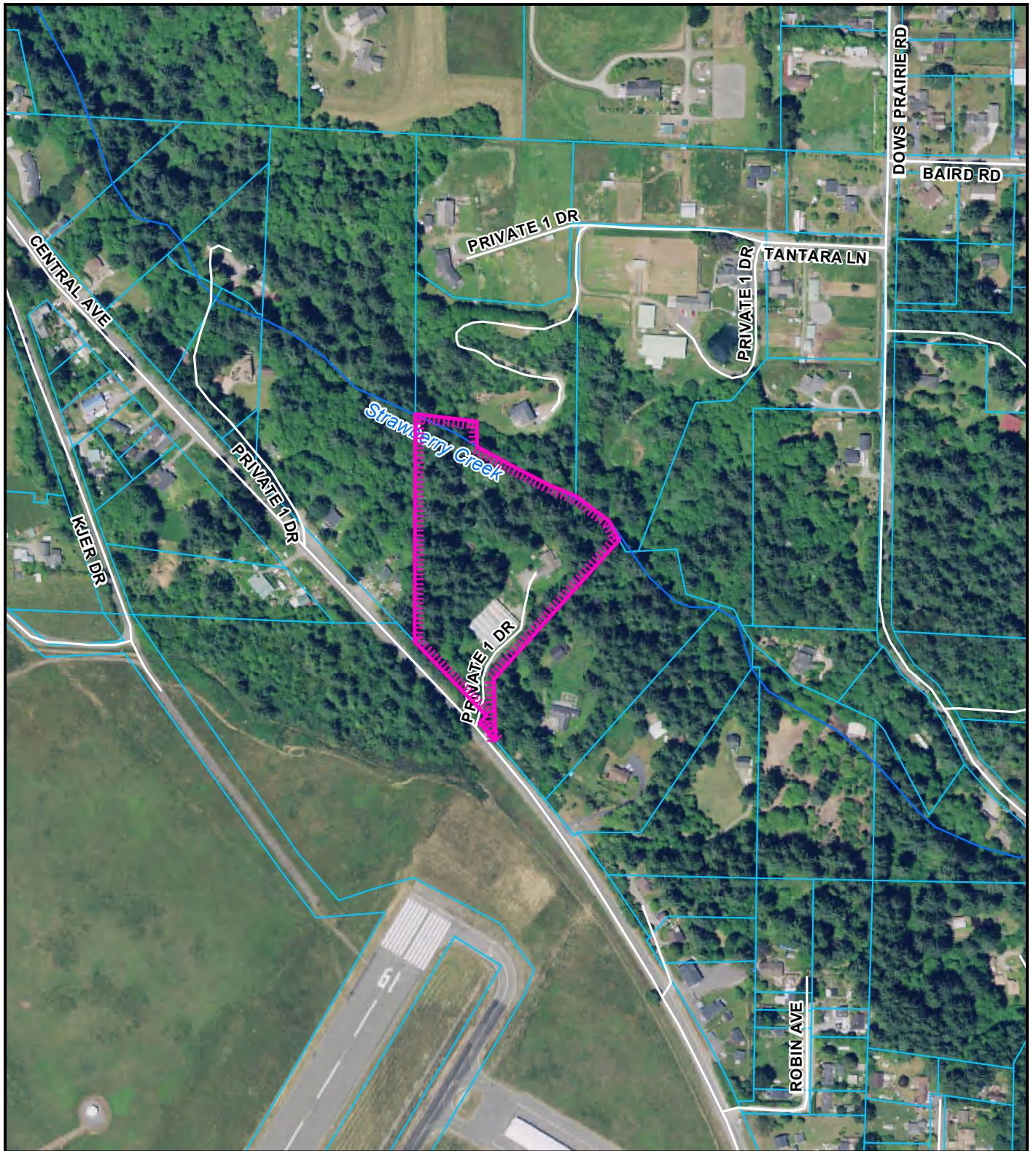
**T07N R01E S18; S19 HB&M (ARCATA NORTH)**

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

0 700 1,400 Feet







Project Area = 

**AERIAL MAP  
PROPOSED BOSIM 4373 LLC  
MCKINLEYVILLE AREA  
PLN-2020-16405  
APN: 511-321-031**

**T07N R01E S18; S19 HB&M (ARCATA NORTH)**

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

0 500 1,000 Feet







## **ATTACHMENT 1**

### **RECOMMENDED CONDITIONS OF APPROVAL**

**APPROVAL OF THE CONDITIONAL USE PERMIT IS CONDITIONED ON THE FOLLOWING TERMS AND REQUIREMENTS WHICH MUST BE SATISFIED BEFORE THE PROJECT MAY BEGIN OPERATING**

#### **A. General Conditions**

1. The applicant shall comply with all conditions of approval applied to the already approved Zoning Clearance Certificate under application 12642.

## ATTACHMENT 2

### 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. Site Plan showing the entire parcel, including easements, streams, springs, ponds and other surface water features, and the location and area for cultivation on the parcel with dimensions of the area for cultivation and setbacks from property lines. The site plan shall also include all areas of ground disturbance or surface water disturbance associated with cultivation activities, including access roads, water diversions, culverts, ponds, dams, graded flats, and other related features. If the area for cultivation is within one-quarter mile (1,320 feet) of a school, school bus stop, church or other place of religious worship, public park, or tribal cultural resource, the site plan shall include dimensions showing that the distance from the location of such features to the nearest point of the cultivation area is at least 600 feet. **(Attached with maps)**
4. A Cultivation & Operations Plan that meets or exceeds minimum legal standards for water storage, conservation and use; drainage, runoff and erosion control; watershed and habitat protection; 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. (Included in Cultivation Operations Plan, item 4. above)
7. If any on-site or off-site component of the cultivation facility, including access roads, water supply, grading or terracing, impacts the bed or bank of any stream or other watercourse, a copy of the Streambed Alteration Permit obtained from the California Department of Fish and Wildlife. (Not Applicable)
8. If the source of water is a well, a copy of the County well permit, if available. (Not applicable)
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 on-site 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. Division of Environmental Health Attachment for Commercial Medical Marijuana (CMM) Clearances/ Permits (DEH Form). (On-file)
15. A Will-Serve letter from the McKinleyville Community Services District dated August 24, 2020. **(Attached)**
16. Floor Plans to outline the cultivation area within the existing structure dated June 2, 2021. **(Attached)**
17. Light Pollution Control Plan dated February 4, 2021. **(Attached)**
18. Storm-water Management Plan dated October 28, 2020. **(Attached)**
19. Noise Evaluation dated February 4, 2021. **(Attached)**
20. Invasive Species Management Plan dated February 4, 2021. **(Attached)**



# BOSIM 4373, LLC

## Site Plan Overview Cultivation and Operations Plan

APN:511-321-031

### Applicant/Owner

BOSIM 4373, LLC  
1551 Nursery Way, Suite B  
Mckinleyville, CA 95519



- **Project Information**

BOSIM 4373, LLC, ("Applicant") has submitted applications for two commercial cannabis cultivation permits on a 6.41-acre parcel, located at 4373 Central Avenue McKinleyville, CA ("Parcel"), Assessor's Parcel Number 511-321-031. Applicant has received a cultivation permit from Humboldt County ZCC-16-524. Applicant has applied for a type 4 Nursery permit for 6,660 square feet and a type 1B specialty indoor cultivation permit of 3,330 square feet. The cultivation and nursery operation will take place in a pre-existing greenhouse structure that was constructed over 20 years ago for the production of orchids. Applicant has put up corrugated metal walls on all sides of the structure and an impermeable floor in the indoor cultivation area of the structure. The Structure has a permanent roof. The Intent of the nursery is for commercial sales of clones to other license cultivation farms.

The cultivation will not produce any nutrient run off waste water being the applicant cultivates in soil using organic inputs. Plants are watered to saturation with minimal run off which is captured in the trays the plants sit in. Any minimal run off evaporates from the trays in short time with the heat, lighting and dehumidification in the area. In the insistence of a leakage or incident that would cause discharge, the cultivation area floor is lined with pond liner that goes up the sidewall to create a basin and not allow for any discharge outside of the building.

The water is sourced from McKinleyville Community Service District. The amount of water used for the project will vary throughout the year, with peak periods of water use occurring during the summer months. For the indoor cultivation permit the applicant estimates to use 2,400 gallons of water per month and about 30,000 gallons per year. For the Nursery permit, applicant estimates they will use about 5,000 gallons per month and a total of 60,000 gallons a year. The Applicant is estimating to annually use 90,000 gallons of water through a drip irrigation system and hand watering for both the Nursery and indoor cultivation permits.

There is an existing single-family residence on site that has a permitted septic system on file with Humboldt county planning department and separate PGE service for electricity. The residence will not be used for the cultivation activities and is not part of the project.

The Applicant is anticipating four (4) harvests from the indoor cultivation permit. There will be two (2) team members who will be working under the indoor cultivation area and three (3) team members for the nursery area. All processing will be done by a 3<sup>rd</sup> party licensed processor.

This application has been prepared in accordance with Humboldt County's ("County") Commercial Medical Marijuana Land Use Ordinance ("CMMLUO").

The Permits would achieve the following results for the Applicant:

- Nursery Permit is comprised of bays 1-4 for a total of 6,660 square feet. 126 lights will be used in the nursery. Each light will produce 315 watts. Half of bay 1 and 2 have existing enclosed structures within that will house rooting clones under led lights on racks. Being that Craig also owns a distribution license, High Grade Distribution will handle all transport of product to license cultivation farms. This will limit the amount of foot traffic to the facility.
- Cultivation Permit is for bay 5 and 6 for 3,330 square feet of Indoor cultivation. The indoor permit will operate 84 750-watt lights.
- Comply with applicable standards for water quality maintenance and watershed protection through the Waiver of Waste Discharge requirements of the North Coast Regional Water

Quality Control Board ("Water Board") and California Department of Fish and Wildlife ("Fish and Wildlife").

- WQCB permit = WDID:1\_12CC422650
- CDFW permit = EPIMS-HUM-09019-R1

- **Project Location**

The Applicant's Parcel is located in the inland zone of Humboldt County in McKinleyville, CA. The Parcel is comprised of 6.41-acres and is identified by Assessor's Parcel Number ( "APN") 511-321-31. The street address for the Parcel is 4373 Central Ave McKinleyville, CA 95519

- **Zoning Classification**

The County's Zoning Classification of the Parcel is AGB5(5)APWR;AGB5QAP+ [GenUse: AR5(MCCP)] with a General Plan Description of AG. The CMMLUO permits new commercial cannabis cultivation on land zoned as AGB5 with cultivation sites up to 10,000 square feet with a Zoning Clearance Certificate providing the land contains Prime Ag soil, slopes less than 15%, and a non-diversionary source of water. The portion of the Parcel zoned AGB5 meets all the zoning requirements for a new cannabis cultivation site and the Applicant will be using less than 20% of the prime soil available.

- **Easements**

There aren't any easements for this Parcel.

- **Natural Waterways**

The Parcel has one (1) known watercourse, Strawberry Creek, per Humboldt County's GIS.

There currently are not any other natural waterways identified on the Parcel.

### **Cultivation Area**

It is proposed that the Commercial Cannabis activity area be located in the southern section of the Parcel. It consists of six (6) greenhouse bays totaling approximately 11,400 square feet, including aisle ways. The structure is currently in existence from a prior orchid farm dating back to the eighties. The Greenhouse structure has been retrofitted to be a hard wall, contained indoor environment.

The nursery permit activity will be conducted in bays 1-4 as depicted in the site plan. 126 lights at 315 watts per light.

The Indoor Cultivation activity will be conducted in bay 5 and 6 as depicted in the site plan. 84 lights at 750-watts per light.

Bay 5-6 will operate as indoor cultivation. The structure has permanent gutter connect walls and permanent roof. The applicant will also have material on hand to replace any part of the roof if damage would occur. The expected life of the roof material is 8yrs. The applicant will inspect the roof and perimeter prior to any cultivation activities to ensure that no light leaks out of the structure. Roof inspections will occur once every 30 days. (*Attachment A, B,C you can see Permanent gutter connect walls and permanent black out roof*)

Cultivation will occur in raised rolling benches with 3-gallon soil pots. The rolling benches have trays on them that will provide catchment for any unexpected water spills or over saturation of the pots. The floors of the indoor cultivation area will have a 65-mil pound liner that will come up 6 inches all around the gutter connect side walls to prevent any water spills from exiting the structure.

The applicant is expecting No discharge to occur, cultivation trays will be set up on drip system with hand watering happening once a week. When hand watering, a water hose will be equipped with a control valve watering wand which will control the flow of water. Any excess water will remain in the trays and will naturally evaporate. If an incident occurs and water is spilled out of the main tray, the secondary catchment tray located at the bottom of each rolling bench will catch any discharge or spillage. The pond liner flooring will prevent any water spillage from the secondary catchment tray.

- **Setbacks of Cultivation Area**

The proposed Cultivation Area will be set back from all parcel lines by at least 30 feet.

- **Access Roads**

The Parcel is located off Central Avenue, which is maintained by Humboldt County. All interior roads are in good condition and any erosion control measures necessary will be addressed in the Applicant's WRPP. The property has a paved driveway.

- **Graded Flats**

There are no graded flats located on the Parcel that require permitting.

- **Existing Buildings**

There is an existing single-family residence on site that has a permitted septic system on file. The residence will not be used for the Cultivation Activities.

- **Water Storage, Use and Watershed Protection**

- **Water Source**

All water used for the cultivation of cannabis is sourced from the McKinleyville Community Services District and rain catchment.

- **Irrigation Plan**

All irrigation of cannabis is completed by a timed, metered, drip irrigation system with minimal hand watering preventing any over watering and runoff.

- **Distances from Significant Landmarks**

There are no schools, school bus stops, state parks, places of worship or Tribal Cultural Resources within 600 feet of the cultivation site.

## **Cultivation and Operations Plan**

- **Materials Storage**

Currently, there are no pesticides or herbicides registered specifically for use directly on cannabis. The Applicant will be using items that were accepted under Legal Pest Management Practices for Marijuana Growers in California.

All fertilizers and amendments are located in the designated Shed on the Parcel as depicted on the site diagram. Fertilizers and amendments are placed on the shelves where any spill will be contained. All labels are kept, and directions are followed when nutrients are applied. The storage area is in need of posted instructions for storing fertilizers and amendments, instructions for cleaning up spills and a spill kit that contains a container, gloves, towels, absorbent socks and an absorbent material (kitty litter). The applicant plans to use strictly organic fertilizers and amendments.

- **Generator**

The Applicant has an ultra-silent diesel generator on hand for emergencies such as power outages. The noise produced by the generator used during emergencies for cannabis cultivation shall not be audible by humans from near by residences. The decimal levels for the generator at the property line shall be no more than 60 decibels. Where applicable, sound levels must also show that they will not result in the harassment of marbled murrelet or spotted owl species. Conformance will be evaluated using current auditory disturbance guidance prepared by the United States fish and wild life service. Fuel shall be stored and handled in compliance with applicable state and local laws and regulations and in such way that no spillage occurs.

The Applicant will be storing garbage and recycling in the Shed and will be removing waste once a week to Humboldt Sanitation & Recycling in McKinleyville.

Compost shall be stored and composted on site. Cannabis waste cannot exceed 50% of the generated organic material.

- **Human Waste**

ADA portable toilets will be rented by B&B Services and be serviced as needed to maintain cleanliness. A hand washing station will be installed in the entry way of the structure.

- **Processing Practices**

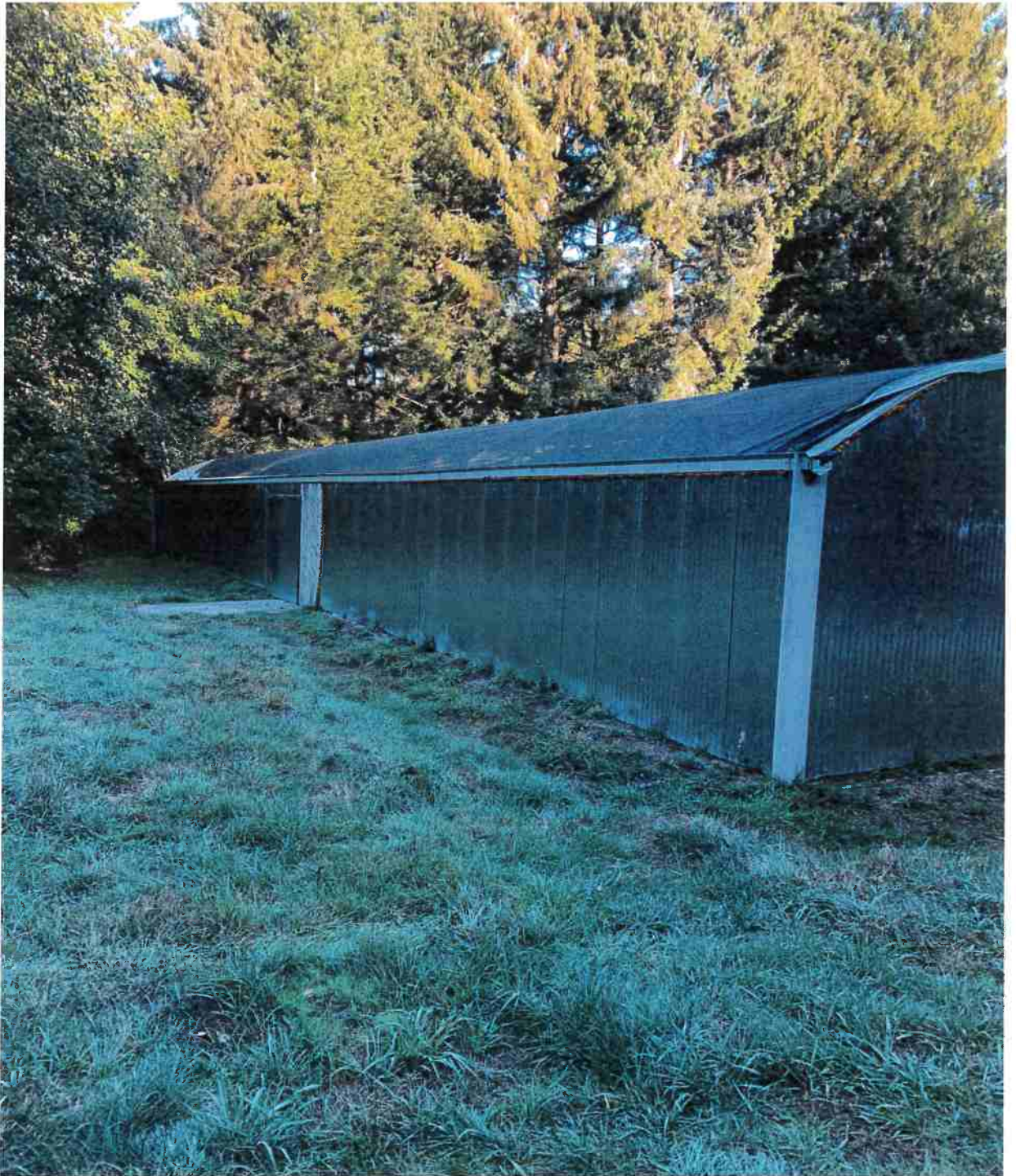
Plants will be harvested in accordance with State regulations to meet MTRC requirements. Plants will be dried and cured on site. All processing will be performed at a permitted processing facility.

All work surfaces and equipment are maintained in a clean, sanitary condition. Protocols to prevent the spread of mold are strictly followed. The final cannabis product is stored in a secure location.

- **Security Measures**

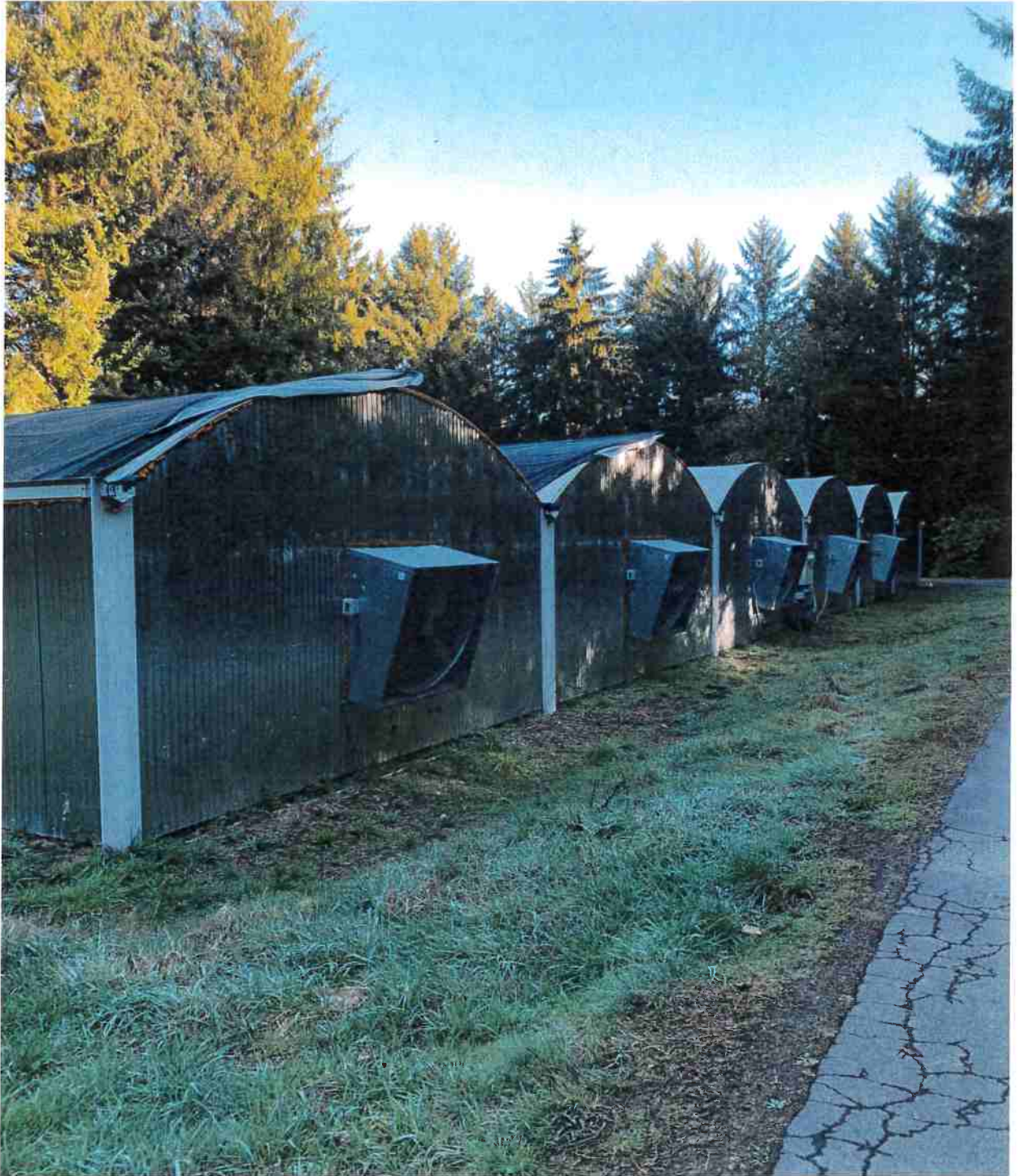
The access to the parcel is gated and locked. The gate is a heavy-duty steel gate with electronic key pad, magnetic lock and automatic closure. There will be cameras placed at the gate, and around buildings and cultivation areas. Electronic access pads will be installed at the door ways so only approved employees with access fobs will be able to enter the buildings. The structure will be alarmed with motion and door sensors. The security system will be monitored 24/7 by Advanced Security.

Attachment A



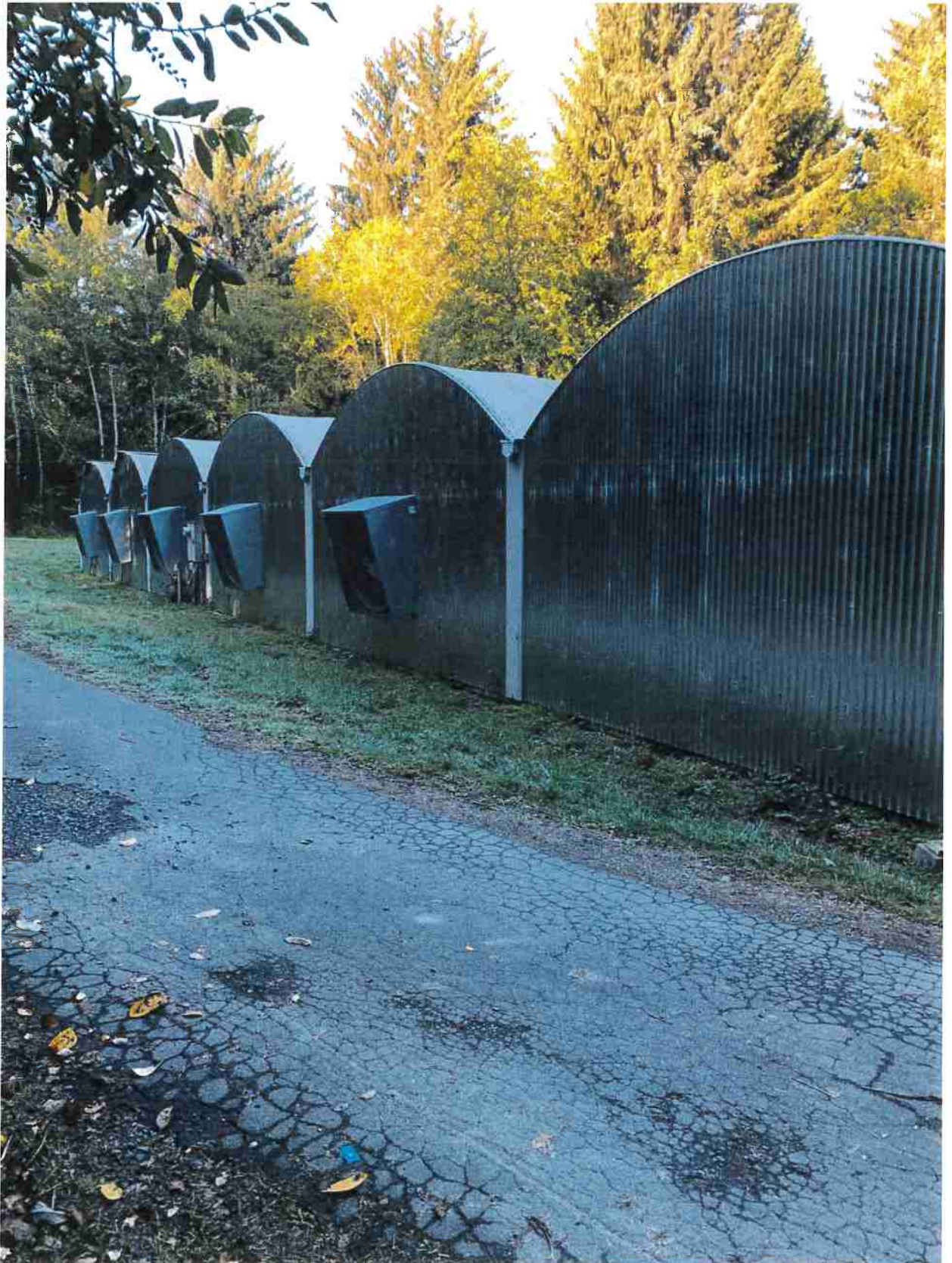


Attachment B





Attachment C

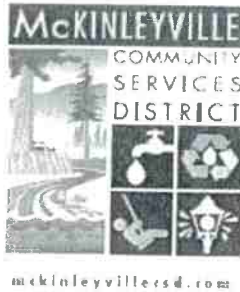


PHYSICAL ADDRESS:

1656 SUTTER ROAD  
McKINLEYVILLE, CA 95519

MAILING ADDRESS:

P.O. BOX 2037  
McKINLEYVILLE, CA 95519



MAIN OFFICE:

PHONE (707) 839-3251  
FAX (707) 839-8456

PARKS & RECREATION OFFICE:

PHONE (707) 839-0003  
FAX (707) 839-5011

February 24, 2020

Natures Peace LLC  
1551 Nursery Way  
McKinleyville, CA 95519-8015



RE: Will Serve for 4373 Central Avenue  
APN #511-321-032  
Account #18-469-000

To whom it may concern:

McKinleyville Community Services District provides water to the address listed above and has sufficient water supply to provide service to them at their current demand.

Sincerely,

Gregory P. Orsini  
General Manager

.cc file

James Henry  
Erik Jones



## David Baldosser

---

**From:** Gino Granados <ggysmael@gmail.com>  
**Sent:** Thursday, February 13, 2020 4:00 PM  
**To:** David Baldosser  
**Subject:** Will Serve Letter  
**Attachments:** 4373 Water Bill.pdf

Hi Dave, Just spoke to you on the phone. Please let me know if you need anything else. I have also attached a copy of a water bill.

We are submitting an application to the State of California for two commercial cannabis cultivation permits (Nursery 6,660 square feet and Indoor cultivation 3,330 square feet) on a 6.41-acre parcel, located in McKinleyville, CA ("Parcel"), Assessor's Parcel Number 511-321-031, 4373 central ave. Applicant has received a cultivation permit from Humboldt County

The amount of water used for the project will vary throughout the year, with peak periods of water use occurring during the summer months. For the indoor cultivation permit the applicant estimates to use 2,400 gallons of water per month and about 30,000 gallons per year. For the Nursery permit the applicant estimates that they will use about 5,000 gallons per month and a total of 60,000 gallons a year. We are estimating to annually use 90,000 gallons of water through a drip irrigation system and hand watering for both the Nursery and indoor cultivation permits.

Thank you

Gino Granados

Business Administrator

707-839-4399

707-616-8216

**McKinleyville C.S.D.**

1656 Sutter Rd.  
P.O. Box 2037  
McKinleyville CA 95519  
(707)839-3251

☐ **ROUND UP FOR RECREATION**  
(please check box) By checking this box and paying more than what you owe, the additional money will benefit the Parks and Recreation Department

\*1/1\*

**UTILITY BILL**

Service Address	Billing Date	Due Date	Account#	Total Amount Due
4373 CENTRAL	02/12/20	02/26/20	NAT0005	\$ 33.40

MKV0213A 1605 1 AV 0.389  
7000001693 00.0005.0047 1605/1



NATURES PEACE LLC  
1551 NURSERY WAY  
MCKINLEYVILLE CA 95519-3982



MCKINLEYVILLE C.S.D.  
PO BOX 2037  
MCKINLEYVILLE, CA 95519-2037

DETACH AND RETURN ABOVE PORTION WITH YOUR PAYMENT. Retain lower portion for your records

Service Address	Account#	From	To	Days
4373 CENTRAL	NAT0005	01/06/20	02/03/20	28

**METER READ(s)**

Prior Water Read 203  
Current Water Read 207

Total usage this period 4

**CHARGES**

LAST PAYMENT RECEIVED 01/22/20 -132.32  
TOTAL CURRENT CHARGES 33.40

Service - Water 17.62  
Usage - Water 6.72  
DCV Inspect Chg 2.58  
HBMWD Pass Thru 6.48

**TOTAL NOW DUE \$ 33.40**

**PRIOR 12 MONTHS CONSUMPTION**

Jan 2020 7  
Dec 2019 15  
Nov 2019 15  
Oct 2019 18  
Sep 2019 0  
Aug 2019 0  
Jul 2019 0  
Jun 2019 0  
May 2019 0  
Apr 2019 0  
Mar 2019 0  
Feb 2019 0

**MESSAGE FROM McKinleyville C.S.D.**

McKinleyville C.S.D.  
www.mckinleyvillecsd.com

1656 Sutter Rd \* PO Box 2037 \* McKinleyville CA 95519 \* (707)839-3251

018-0830



10'X10' COMPOST  
TO BE SHARED AMONG PERMITS

HARVEST STORAGE AREA

Cannabis Waste

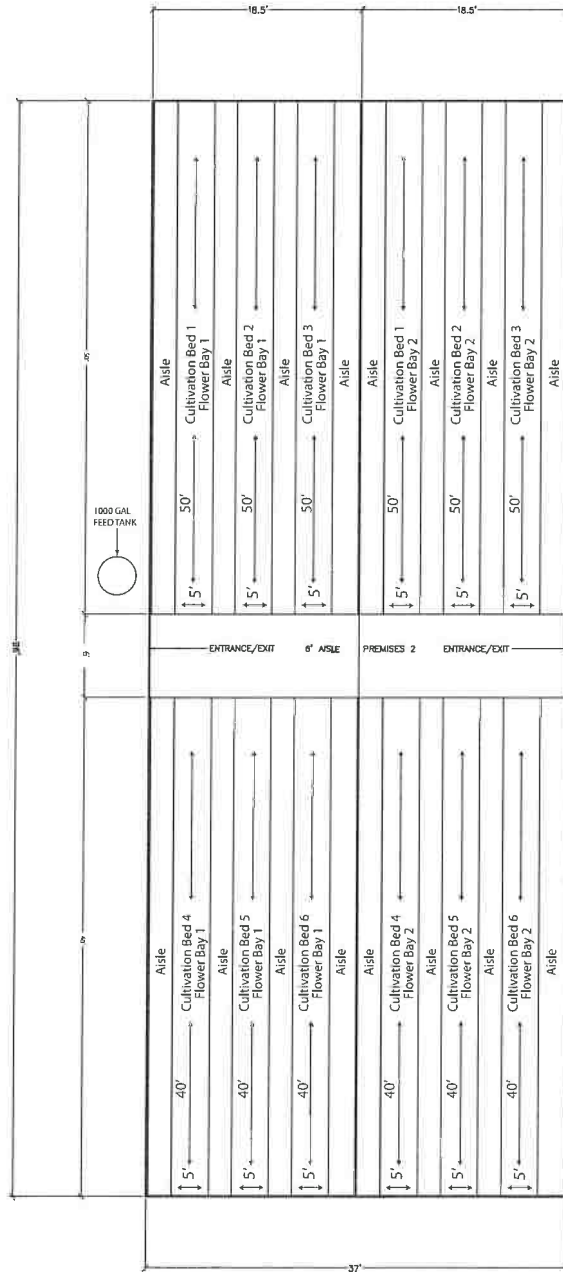
PESTICIDE & AGRICULTURAL  
CHEMICAL STORAGE  
STORAGE BUILDING  
ADMINISTRATIVE HOLDING AREA

\*located on the outside/ shared by licenses

RECEIVED

JUN - 2 2021

Humboldt County  
Cannabis Svcs.



CO-1

PLN-2020-16405 Bosim 4373

INDOOR PREMISE DIAGRAM

HUMBOLDT COUNTY, CALIFORNIA

BOSIM 4373 LLC  
APN: 511-321-031  
4373 CENTRAL AVE  
MCKINLEYVILLE, CA 95519

July 1, 2021

DESCRIPTION

OWN BY DEC BY OK BY AP BY



Page 27 of 37



165 South Fortuna Boulevard, Fortuna, CA 95540  
707-725-1897 • fax 707-725-0972  
trc@timberlandresource.com



Bosim 4373, LLC  
1551 Nursery Way  
Mckinleyville, CA 95519

February, 04, 2021

**Subject: APN 511-321-031-000 Light Pollution Control Plan**

**Background**

Humboldt County Ordinance No. 2599 or the Commercial Cannabis Land Use Ordinance (CCLUO) regulates land use within the county associated with commercial cannabis operations.

Section 55.4.12.4 of the CCLUO outlines performance standards for managing potential light pollution. This section states:

- a) Structures used for Mixed Light Cultivation and Nurseries shall be shielded so that no light escapes between sunset and sunrise.
- b) Where located on a Parcel abutting a residential Zoning District or proposed within Resource Production or Rural Residential areas, any Security Lighting for Commercial Cannabis Activities shall be shielded and angled in such a way as to prevent light from spilling outside of the boundaries of the Parcel(s) or Premises or directly focusing on any surrounding uses.
- c) The County shall provide notice to the operator upon receiving any light pollution complaint concerning the cultivation site. Upon receiving notice, the applicant shall correct the violation as soon as possible and submit written documentation within ten (10) calendar days, demonstrating that all shielding has been repaired, inspected and corrected as necessary. Failure to correct the violation and provide documentation within this period shall be grounds for permit cancellation or administrative penalties, pursuant to the provisions of 55.4.5.3.

**Site Conditions**

The cultivation site consists of a greenhouse structure with opaque walls and a transparent ceiling. Supplemental lighting has potential to escape vertically from the sight. No outside walkway or security lighting was observed.

**Light Pollution Mitigations**

The cultivation operation shall prevent any light from escaping the greenhouse structure from sunset to sunrise. This will consist of some type of automated blackout curtain mechanism that will cover the roof of the greenhouse at least 30 minutes before sunset and 30 minutes after sunrise. The mechanism will most likely cover the outer surface of the greenhouse but may also be designed so that it covers lights within the structure; as long as no light can be seen from outside of the structure. Additionally any walkway lighting, security lighting or any other outside lighting shall be shielded so that no light escapes vertically into the sky.

Sincerely,

Jack A Henry

Wildlife Biologist  
Timberland Resource Consultants



165 South Fortuna Boulevard, Fortuna, CA 95540

707-725-1897 • fax 707-725-0972

trc@timberlandresource.com



10/28/2020

511-321-031-000

BOSIM 4373 LLC

## **Stormwater Management Plan**

### **- Location, capacity, and operation of all existing and proposed drainage features**

At present, there are four existing drainage features related to stormwater management:

- 1- A county storm drain (approximately 19-inch diameter) collects road surface runoff from the western side of Central Avenue (off-site) and drains stormwater onto the property (see stormwater diagram attached). This feature is off-site but is operating properly.
- 2- The cultivation structure has 7 parallel gutters (one at each side and 5 section divisions) that collect stormwater from the structure and drains from both the NW and SE ends splitting the runoff into 14 drainage points where the ground surface is covered in rock surfacing. No erosion was observed at any of these 14 drainage points. Six 2,500-gal storage tanks are proposed in the previously submitted Property Diagram for storage of rainwater from these gutter.
- 3- A 12-inch diameter drainage pipe inlet (located at the eastern corner of the cultivation structure) collects surface runoff and transmits flows under a gravel parking area and into a vegetated area below (see stormwater diagram attached). This structure is clear and functioning properly.
- 4- An 8-inch drainage pipe is installed parallel to the southwest side of the cultivation structure to allow stormwater to pass under the entrance door access way. This structure is clear and functioning properly.

### **- Current drainage conditions**

The project area is predominantly gently sloped ranging from 5-10%. The main access road/driveway, the cultivation structure, and the house make the entirety of the impermeable surfaces on the property. All other surfaces are vegetated, or consist of organic debris/duff, native soil, or graveled surfaces. The main access road/driveway is paved and overall acts as a drainage divide for most stormwater on the property. All stormwater from the road, and west of the road, drains to the northwest towards a forested area and a watercourse. All stormwater on the east side of the main access road/driveway flows to the northeast toward a heavily forested area. These flow descriptions describe potential stormwater runoff flow directions based on surface

topography. The attached stormwater diagram depicts these drainage direction with small blue arrows (arrow length does not indicate any value or measurement). Apart from the three previously described drainage features, there were no indications of surface stormwater flows or defined flow paths.

**- Analysis of any proposed alteration of on-site and off-site drainage flows**

No alterations to the stormwater drainage or surface permeability are proposed or anticipated.

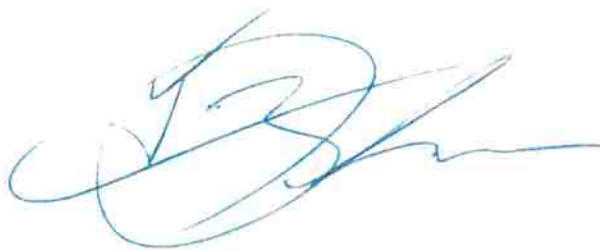
**- Prescribed measures to ensure that the project will retain pre-project drainage conditions and result in no net increase in the volume of stormwater runoff from the property**

This project, in its existing form/configuration has been in place since the 1980's and no alterations are proposed or anticipated at this time. Thus, no measures are needed to prevent an increase in the volume of stormwater runoff. The collection of stormwater from the gutters of the cultivation structure will reduce stormwater runoff from the northwest side of the cultivation structure.

**- Maintenance Intervals for all drainage improvements**

The existing features located on-site (gutter, drain pipe, and drainage ditch), will be inspected prior to the rainy season each year and maintained as needed to ensure proper function.

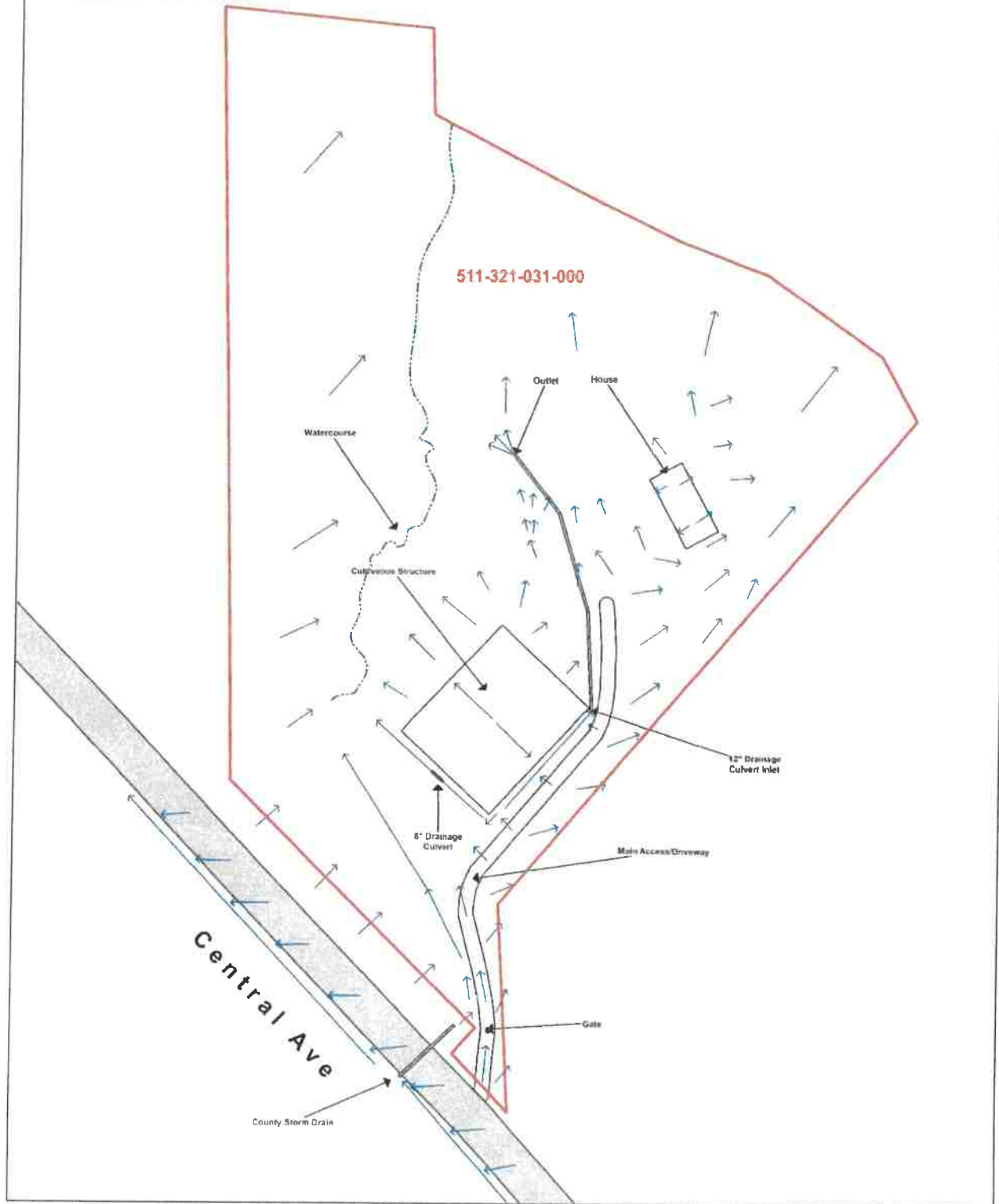
Jessie Cahill  
Water Resource Compliance Manager  
Timberland Resource Consultants  
[jcahill@timberlandresource.com](mailto:jcahill@timberlandresource.com)  
(707) 498-5854

A handwritten signature in blue ink, appearing to be 'J. Cahill', is written over a faint, larger blue ink signature that is partially visible underneath.



# Stormwater Diagram

BOSIM 4373 LLC





165 South Fortuna Boulevard, Fortuna, CA 95540  
707-725-1897 • fax 707-725-0972  
trc@timberlandresource.com



Bosim 4373, LLC  
1551 Nursery Way  
Mckinleyville, CA 95519

February, 04, 2021

**Subject: APN 511-321-031-000 Noise Evaluation**

**Background**

Humboldt County Ordinance No. 2599 or the Commercial Cannabis Land Use Ordinance (CCLUO) regulates land use within the county associated with commercial cannabis operations.

Section 55.4.12.6 of the CCLUO outlines performance standards for managing potential noise pollution. This section states:

"Noise from cultivation and related activities shall not result in an increase of more than three decibels of continuous noise above existing ambient noise levels at any property line of the site. Existing ambient noise levels shall be determined by taking twenty-four hour measurements on three or more property lines when all cannabis related activities are not in operation."

**Site Conditions**

The cultivation site consists of an existing greenhouse structure with solid walls and a transparent ceiling. The structure contains 6 large (approximately 24-30" diameter) ventilation fans. The parcel is located adjacent to the Arcata Airport and Central Avenue in McKinleyville, CA.

**Methods**

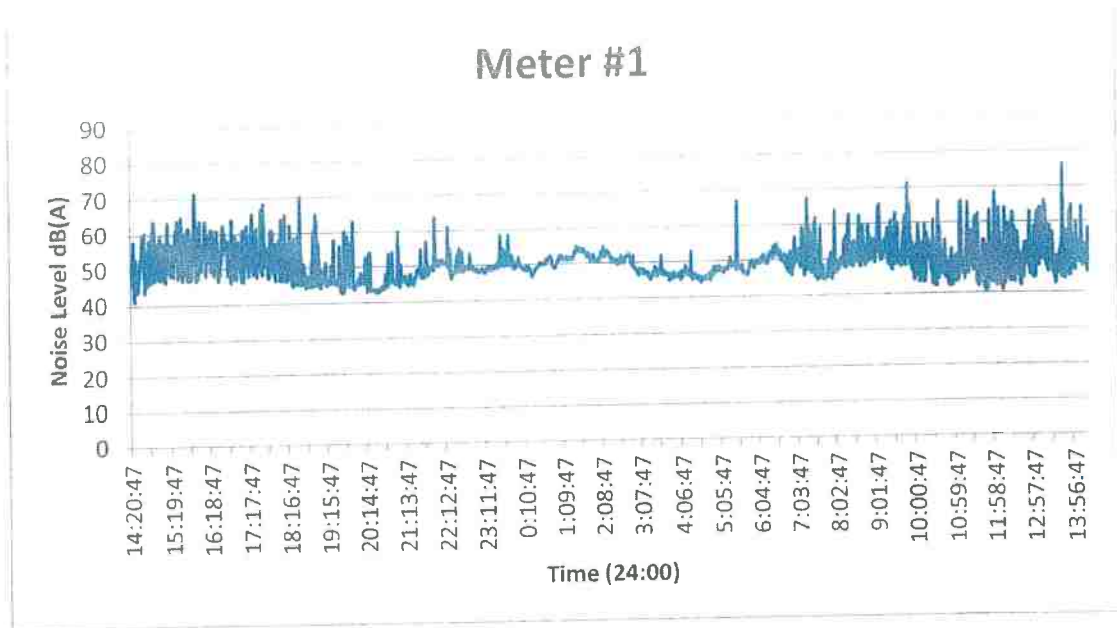
As outlined in the Performance Standards of the CCLUO, decibel levels are measured at three property lines. Measurements were conducted with three CEM DT-8852 Industrial High Accuracy Digital Sound Level Meters. These devices measure dB(A) and dB(C) within a 1.4 dB accuracy using an internal data logger. These meters were set to measure dB(A) ranging from 30 to 130, on slow setting, at a 59 second recording interval. Sound meters were set at three property lines and data was recorder for a 24 hour period. An attached map shows the locations of the meters. The initial pre-operations dataset was recorded from 14:18 on 02/03/2021 to 14:20 on 02/04/2021. The second noise recording will be conducted once commercial operations commence. After the data is collected it is imported into Microsoft Excel for statistical analysis. Data is averaged and a line graph is generated for visual representation of the dataset.

**Results**

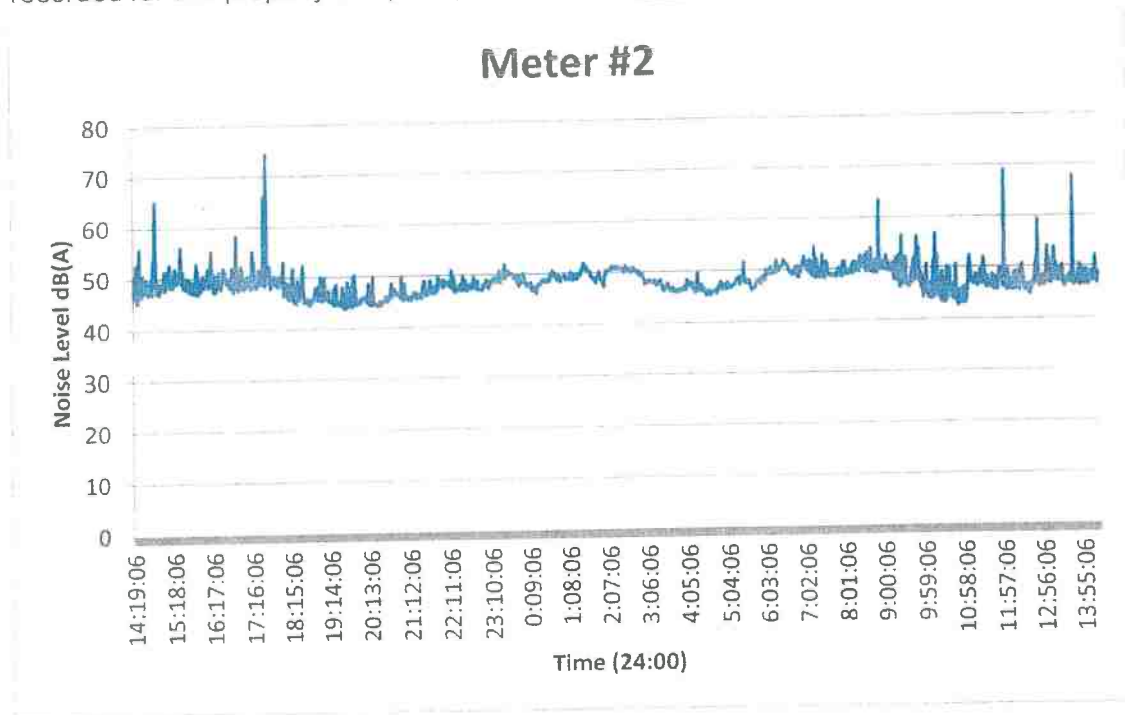
Data recorded at 59 second intervals resulted in a total sample size (n) of 1464 data points per sound meter. Each dataset contains a graph and average of decibel level.

Sound Meter #1 was located along the property line adjacent to Central Avenue and recorded the highest average decibel levels. The average noise level recorded for this property line pre-operations was 50.35 dB(A).

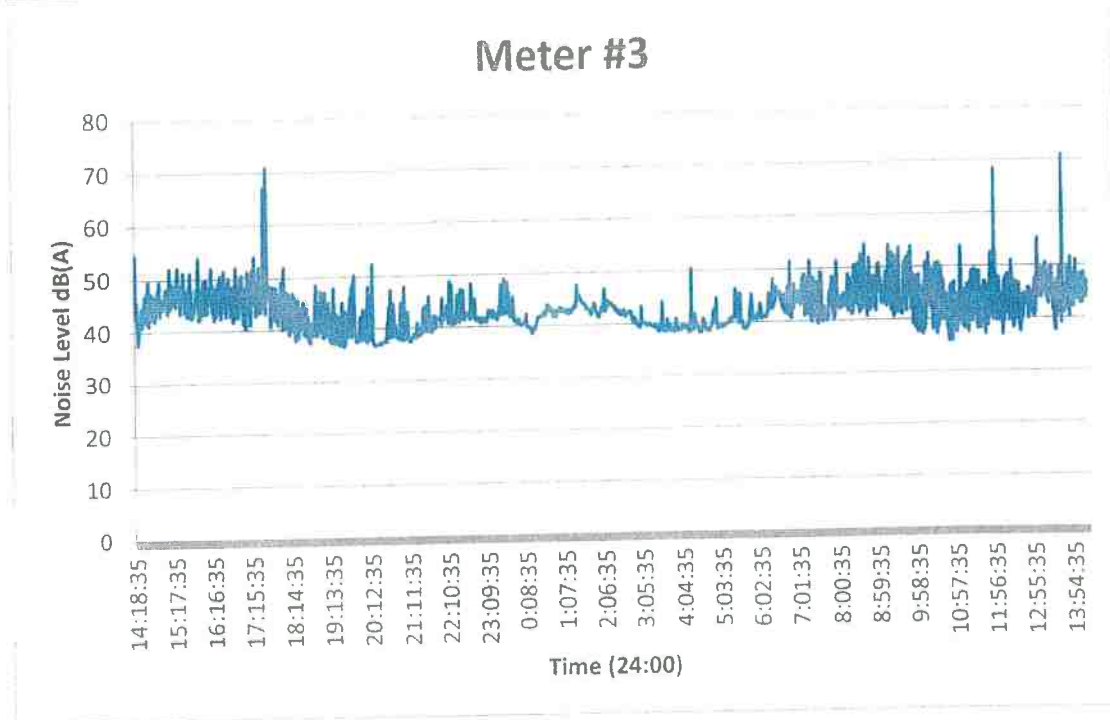




Sound Meter #2 was located along the eastern property line near the eastern neighbor's residence. This meter was nearest to the cultivation site. The average noise level recorded for this property line pre-operations was 48.27 dB(A).



Sound Meter #3 was located along the western property line within the spruce forest behind the western neighboring residence. This meter was furthest from the road and airport. The average noise level recorded for this property line pre-operations was 43.02 dB(A).



These observed average noise levels are within the expected range of what cultivation operations will produce. The proximity of the airport and Central Avenue make the probability of this project significantly increasing noise levels unlikely.


Sincerely,

Jack A Henry

Wildlife Biologist


Timberland Resource Consultants

Sound Meter Location Map  
2020 NAIP DOQ

 Property Boundary

 Sound Level Meter

  
NORTH

0 100  
  
feet

 #3

 #2

 #4





165 South Fortuna Boulevard, Fortuna, CA 95540  
707-725-1897 • fax 707-725-0972  
trc@timberlandresource.com



February 04, 2021

Bosim 4373, LLC  
1551 Nursery Way  
Mckinleyville, CA 95519

**Subject: APN 511-321-031-000 Invasive Species Management Plan**

**Summary of Findings**

No invasive species were identified in close proximity to the cultivation site within parcel boundaries.

**Background**

Humboldt County Ordinance No. 2599 or the Commercial Cannabis Land Use Ordinance (CCLUO) regulates land use within the county associated with commercial cannabis operations. This ordinance contains language requiring applicants/operators to identify and manage invasive species populations if encountered on-site. Any invasive species present within the cultivation site must be eradicated. The spirit of this specific condition is to prevent the establishment and/or spread of invasive species as a result of cannabis operations.

**Methods**

Timberland Resource Consultants Wildlife Biologist Jack Henry visited the parcel on October 22, 2020. The area was walked and all invasive plant species, their locations, and approximate area cover was documented. Recommended removal methods are based on the best available science and are often sourced from the Natural Resource Conservation Service (NRCS), United States Department of Agriculture (USDA), United States Forest Service (USFS), California Invasive Plant Council (Cal-IPC), California Department of Fish and Wildlife (CDFW), or other state resource agencies.

**Results**

No invasive species per the Cal-IPC plant list were identified within or adjacent to the cultivation site. Some ornamental nonnative plants are located within parcel boundaries around the existing residence. The cultivation site is located in a pre-existing greenhouse structure within an existing forest opening. The surrounding area is typical *Picea Sitchensis* Forest Alliance. Invasive species are present on neighboring parcels and could provide pathways for invasion. The project operator should remain vigilant for the potential sprouting of scotch broom (*Cytisus scoparius*), French broom (*Genista monspessuluna*), cotoneaster (*Cotoneaster sp.*), pampas grass (*Cortaderia sellona*), and Himalayan blackberry (*Rubus armeniacus*), and others. If any of these species are encountered on-site they should be removed immediately before populations may establish.

Sincerely,  
Jack A Henry

Wildlife Biologist  
Timberland Resource Consultants

### ATTACHMENT 3

#### REFERRAL AGENCY COMMENTS AND RECOMMENDATIONS

Referrals were not required for this action.			
--	--	--	--