

COUNTY OF HUMBOLDT Planning and Building Department Current Planning Division

3015 H Street Eureka CA 95501 Phone: (707)445-7541 Fax: (707) 268-3792

Hearing Date:	September 16, 2021
To:	Humboldt County Planning Commission
From:	John H. Ford, Director of Planning and Building Department
Subject:	Westpoint Timberland Inc. Application Number PLN-16086-CUP Assessor's Parcel Number (APN) 208-231-002 Dinsmore area

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Please contact Abbie Strickland, Planner, at 707-441-2630 or by email at astrickland@co.humboldt.ca.us if you have any questions about the scheduled public hearing item.

AGENDA ITEM TRANSMITTAL

Hearing Date	Subject	Contact
September 16, 2021	Special Permit	Abbie Strickland

Project Description The applicant is seeking a Special Permit for one-acre of pre-existing outdoor commercial cannabis cultivation. Light deprivation techniques are utilized to achieve two harvests annually. Water for irrigation will be sourced from a proposed well. The applicant is proposing to install 151,800 gallons of water storage. The applicant's estimated annual water use is 77,000 gallons. Energy for the project will be sourced from a proposed solar array. No generators will be used on site for cannabis cultivation or ancillary activities. Processing will occur on site and two full-time employees and a maximum of six seasonal employees will work on site. A Special Permit is also required for existing cultivation sites on slopes of 15-30% and for remediation efforts within the Streamside Management Area.

Project Location: The project is located in the County of Humboldt, in the in the Dinsmore area, on the north side of River Road, approximately 3,500 feet west from the intersection of River Road and Eight Mile Ridge Road, on the property known as 662 River Road.

Present Plan Land Use Designations: Residential Agriculture (RA20-160), Density: Range is 20 to 160 acres per unit, 2017 General Plan, Slope Stability: High Instability (3).

Present Zoning: Forestry Recreation (FR) Minimum building site area 40 acres (B-5(40))

Application Number: PLN-2019-16086

Assessor Parcel Numbers: 208-231-002

Applicant	Owner
Westpoint Timberland Inc.	Doctors Hearth, LLC
Vu, Luu	7997 Dark Hollow Pl.
PO Box 80743	Las Vegas, NV 89117
Las Vegas, NV 89180	-

Environmental Review: The proposed project is statutorily exempt from the provisions of the California Environmental Quality Act (CEQA) per section 15270 (Projects Which Are Disapproved) of the CEQA Guidelines.

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

Major Issues: Inconsistency with Humboldt County Code, lack of adequate information to support making required findings for approval, and uncooperative applicants.

Westpoint Timberland, Inc. PLN-2019-16086 APN: 208-231-002

Recommended Commission Action:

- 1. Describe the application as a public hearing;
- 2. Request that staff present the project;
- 3. Open the public hearing and receive testimony; and
- 4. Close the hearing and take the following action:

Find the project exempt from environmental review pursuant to State CEQA Guidelines Section 15270, make the finding that the project site is in violation of Humboldt County Code and that the applicant has not provided the County the information necessary to make the required findings for approval and adopt the Resolution denying the proposed Westpoint Timberland, Inc. project.

Executive Summary: For Planning Commission consideration is an application under the Commercial Cannabis Land Use Ordinance (CCLUO) for a Special Permit for 43,560 square feet (one acre) of existing outdoor commercial cannabis cultivation. Special Permits are also required for existing cultivation sites on slopes of 15-30% and for remediation efforts within the Streamside Management Area.

Staff is recommending denial of the project because the applicant has been unresponsive to County requests for information and has repeatedly violated county ordinance. The submitted application does not include evidence to support making the required findings under Section 312-17.1 of the Humboldt County Code (required findings for all permits). This project is not consistent with section 314-55.4.12.1.1, which states that permittees and operators shall conduct all commercial cannabis activities in compliance with all applicable state laws and County ordinances. By initiating cultivation prior to permit approval, the applicant has violated the Humboldt County Code, as well as violated various provisions of state law as described below.

The Westpoint Timberland, Inc., application was submitted on December 27, 2019, at which time the applicant signed the Application Form acknowledging that applications that are not complete or do not contain truthful and accurate information may result in denial of the application. The Cultivation Operations Plan and Site Plan submitted by the applicant referenced the project as being proposed. However, on August 3rd, 2020, a Violation Letter was sent to the applicant for unauthorized cultivation totaling 8,793 square feet without the required County and State permits. The applicant paid the penalty fee and was notified that repeated unauthorized cultivation would lead denial of the permit application.

On August 20, 2021, the applicant and property owner received a second Violation Letter for the unauthorized cultivation of 8,750 square feet. The applicant was notified that the Planning Department intended to take the application forward to the Planning Commission for denial. The applicant was also provided with the opportunity to withdraw their application. No response from the applicant or property owner was received.

Summary: The submitted application does not include enough evidence to support making the required findings under Section 312-17.1. Because cultivation was initiated without a permit, the project is not consistent with 314-55.4.12.1.1, which states that permittees and operators shall conduct all commercial cannabis activities in compliance with all applicable state laws and County ordinances. Finally, the department has attempted to contact the applicant and the applicant has failed to respond.

ALTERNATIVES: The Planning Commission could elect to direct staff to continue to attempt to reach the applicant to resolve the outstanding issues and continue processing the application in accordance with HCC Section 312-4.1 et seq. However, given that staff has made multiple attempts to contact the applicant and he has been unresponsive, staff does not recommend this alternative.

RESOLUTION OF THE PLANNING COMMISSION OF THE COUNTY OF HUMBOLDT Resolution Number: 21-Records Number: PLN-2019-16086 Assessor's Parcel Number: 208-231-002

Resolution by the Planning Commission of the County of Humboldt certifying compliance with the California Environmental Quality Act and denying the Westpoint Timberland, Inc., Special Permit.

WHEREAS, Westpoint Timberland, Inc., submitted an application on December 27, 2019 for a Special Permit for one-acre of pre-existing outdoor commercial cannabis cultivation; and

WHEREAS, the property was operated in violation of the county ordinance and state law; and

WHEREAS, the project is statutorily exempt from environmental review pursuant to Section 15270 of the State CEQA Guidelines (projects which are disapproved); and

WHEREAS, the Humboldt County Planning Commission held a duly-noticed public hearing on September 16, 2021, and reviewed, considered, and discussed the application for a Special Permit, 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 Special Permit for one-acre of pre-existing outdoor commercial cannabis cultivation.
 - **EVIDENCE:** a) Project File: PLN-2019-16086
- 2. FINDING: CEQA. The requirements of the California Environmental Quality Act have been complied with. The project is statutorily exempt from CEQA as it is a project which is not approved.
 - **EVIDENCE:** a) Section 15270 of the CEQA Guidelines

FINDINGS FOR SPECIAL PERMIT

- **3. FINDING** The proposed development is not consistent with the requirements of the CCLUO Provisions of the Zoning Ordinance.
 - **EVIDENCE** a) The applicant has repeatedly violated Humboldt County Code Section 314-55.4.12.1.1 which states that permittees and operators shall conduct all commercial cannabis activities in compliance with all applicable state laws and County ordinances.
 - b) By cultivating without the required state license, the applicant has violated various provisions of state law.

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
- Denies the Special Permits for Westpoint Timberland, Inc., based upon the Findings and Evidence.

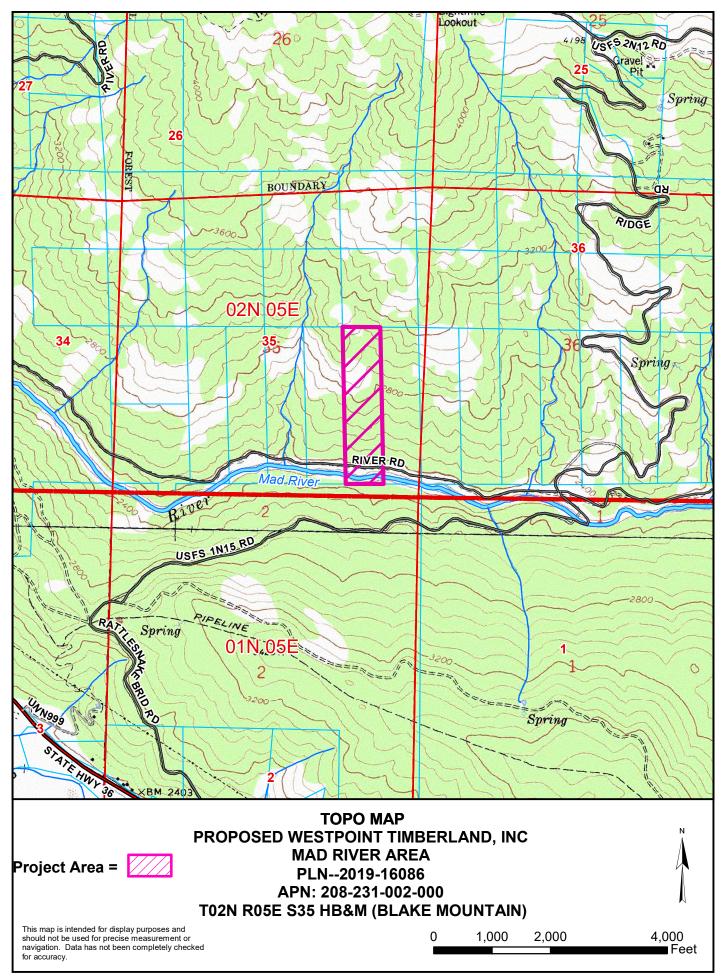
Adopted after review and consideration of all the evidence on September 16, 2021.

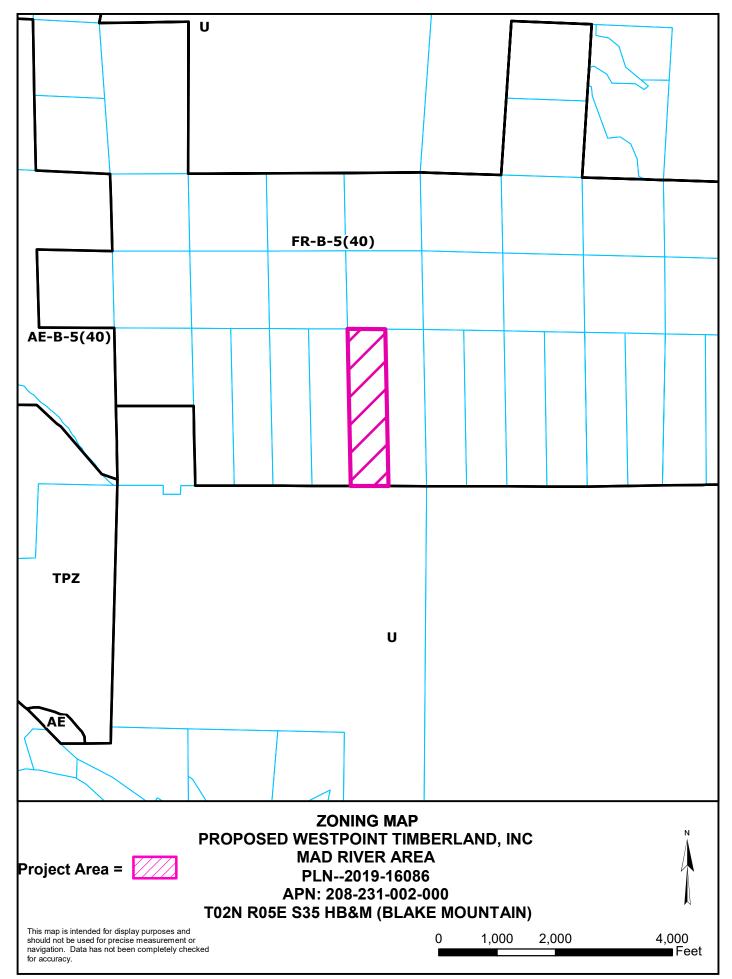
The motion was made by COMMISSIONER ______ and second by COMMISSIONER ______ and the following ROLL CALL vote:

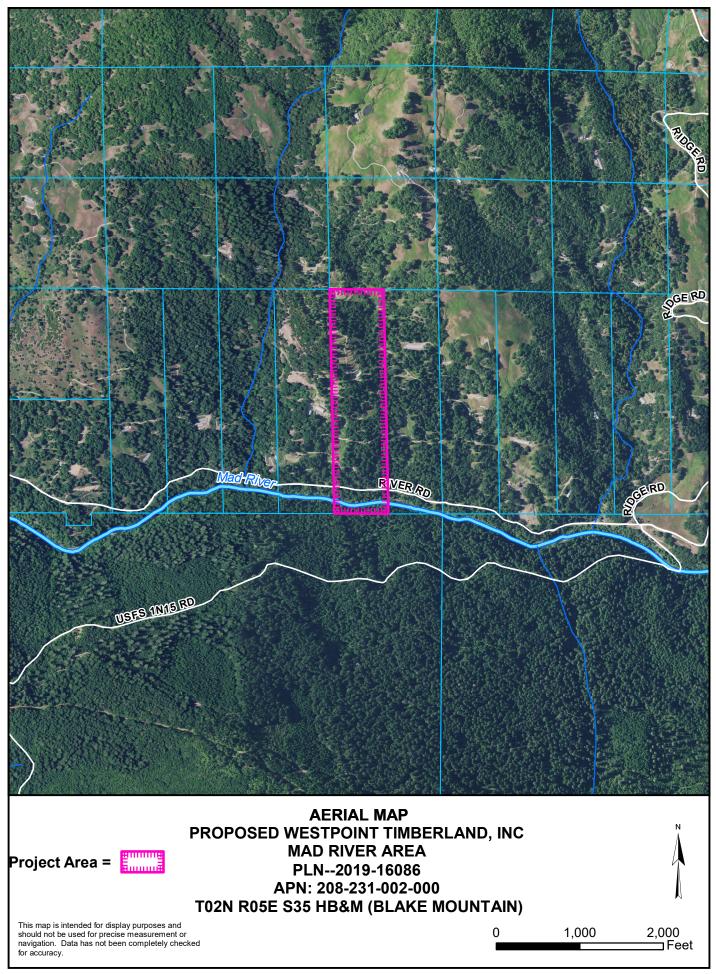
AYES:COMMISSIONERS:NOES:COMMISSIONERS:ABSENT:COMMISSIONERS:ABSTAIN:COMMISSIONERS:DECISION:

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







ATTACHMENT 1

VIOLATION LETTERS



COUNTY OF HUMBOLDT Planning and Building Department Cannabis Services Division

3015 H Street Eureka CA 95501 Fax: (707) 268-3792 Phone: (707)445-7541

August 20, 2021

Westpoint Timberland Inc. c/o Lu Vuu P.O. Box 80743 Las Vegas, NV 89180

RE: Permit Application No. 16086, APN 208-231-002

Lu Vuu,

On August 3, 2020, a letter identifying a violation of county ordinance due to approximately 8,793 square-feet of unauthorized commercial cannabis cultivation occurring on the parcel was sent to you (attached). This letter identified the steps necessary to bring the application back into compliance, which included the removal of all unauthorized cannabis and related infrastructure and the payment of a financial penalty for the unauthorized cannabis. This letter also stated that repeated unauthorized cultivation will lead to denial of the permit application.

As part of its ongoing review of cannabis projects, the Planning and Building Department evaluates satellite imagery of cultivation areas. According to our records, there are no active permits to cultivate currently in place at this property. Based upon the aerial imagery provided below, it appears that 8,750 square-feet of unauthorized commercial cannabis cultivation is occurring currently. The analysis of satellite imagery includes evidence that greenhouses have been constructed and tarps utilized (see attached images). All cannabis and cannabis infrastructure must be removed from the property no later than Monday August 30, 2021. If evidence is not submitted demonstrating the removal, this issue will be referred to code enforcement for action.

Additionally, based on the repeated violation of county ordinance and state law, the county intends to recommend to the Planning Commission that your project be denied. We are currently working to schedule this for a hearing, and you will be billed for the effort and cost involved in preparing the project for hearing. Alternatively, you may withdraw your application and avoid the expense of this effort.

If you have questions about this letter, please contact Cliff Johnson, Supervising Planner at (707) 268-3721 or at <u>cjohnson@co.humboldt.ca.us</u>

ENC: Satellite Imagery

C: Department of Cannabis Control



Figure 1: Aerial Imagery March 2021



Figure 2: Aerial Imagery April 2021



Figure 3: Aerial Imagery May 2021



Figure 4: Aerial Imagery June 2021

August 03, 2020

Westpoint Timberland, Inc. co Luu Vu PO Box 80743 Las Vegas, NV 89180

RE: Permit Application No. 16086, APN 208-231-002-000

Westpoint Timberland, Inc. co Luu Vu,

As part of its ongoing review of cannabis projects, the Planning and Building Department evaluates satellite imagery of cultivation areas. That review process has identified a potential violation for the above referenced project. The County is committed to helping all cannabis applicants remedy violations and comply with local and state regulations. **Your immediate attention is requested to resolve the issues described below**.

According to our records, there are no active permits to cultivate currently in place at this property. **Analysis of satellite imagery has concluded that cultivation is occurring without the required permits and approvals**. Specifically, unauthorized cultivation measured at 8,793 square feet appears to be occurring currently.

The penalty fee for the unauthorized cultivation is calculated by multiplying the area of unauthorized cultivation by twice the Measure S Excise Tax (\$2 a square foot for outdoor and \$4 a square foot for mixed light cultivation). The total penalty for the unauthorized cultivation described in this letter is \$17,587.00. The area of unauthorized cultivation must also be removed and restored immediately. Please also be advised that repeated unauthorized cultivation will lead to denial of the permit application.

Response Required

The following options are available, and a response must be communicated to the Department in writing within 10 days:

- 1. If the aerial imagery analysis is accurate, resolve the violation by paying the penalty fee and removing the unauthorized cultivation area including infrastructure; OR
- 2. Withdraw the application, remove all cannabis related fixtures and equipment from the parcel, and remediate, restore, and restock any disturbed area to their natural condition; OR
- 3. Respond to this letter with clear and substantial evidence to establish why the unauthorized cultivation did not occur.

Responses must be received within 10 days of the date of this letter. If no response is received within 10 days of the date of this letter, the application will be prepared for hearing with the evidence presently in the file. Staff will recommend denial and refer the project for enforcement actions.

If you have questions about this letter, please contact resolution liaison Branden Howton at (707) 476-2367 or at <u>bhowton1@co.humboldt.ca.us</u>

Sincerely,

Cliff Johnson Supervising Planner

ENC: Satellite Imagery EC: gasdoc@gmail.com; brittany@humboldtlogistics.co CC:

Agent: Humboldt Logistics attn: Brittany Massaro PO Box 684 Fortuna, CA 95540

Owner: Doctors Hearth LLC 7997 Dark Hollow Pl Las Vegas, NV 89117



Satellite Imagery - Application No. 16086

additional imagery of cultivation activity is availble upon request, as well as specific date and time of each image reviewed July 2020 Planet Labs Monthly Satellite Mosaic Image



additional imagery of cultivation activity is availble upon request, as well as specific date and time of each image reviewed



additional imagery of cultivation activity is availble upon request, as well as specific date and time of each image reviewed

ATTACHMENT 2

CULTIVATION AND OPERATIONS PLAN

OPERATIONS PLAN EXISTING 1 ACRE OUTDOOR CULTIVATION WESTPOINT TIMBERLAND, INC



PARCEL INFORMATION

APN 208-231-002-000 662 RIVER ROAD DINSMORE, CALIFORNIA

Per Humboldt County GIS, this parcel was conducting ~92,087 square feet of cultivation in 2015. This special permit application is for a special permit for 1 acre of cultivation, half of the pre-existing cultivation per HC 2.0 Ordinance.

The project is located off of State Highway 36, to County Line Creek Road, that eventually becomes River Road.

Seed, Clone Stock, and Diseases

Clone's source Westpoint Timberland, Inc's cultivation operations. Clone propagation is done on-site in a greenhouse at the bottom of all cultivation activities. There will be a temporary and seasonal 20 x 100 hoop house for on-site propagation and nursery activities to feed the operations. There will also be PVC hoophouses on the Outdoor flats for environmental control, as this area gets very cold, and abrupts the start of operations until late in the season. Due to the elevation, it is better that the outdoor light deprivation plants, strive in greenhouses. These hoop houses have no power or electricity, and absolutely no lights hanging in them. They are strictly to give a warmer environment to the outdoor plants.

If clones are purchased, the clones are quarantined after purchase, and tracked from nursery to cultivation site through California track and trace METRC operations, thru proper distribution logistics of a CDFA distribution transport only license, or a licensed delivery distributor. The cultivation foreman will be responsible for all data input. The propagation will be a mix of genetics of clones, using dirt plugs that are biodegradable. Generally, Westpoint Timberland, Inc cultivates OG Kush, a heavy Indica, grows best on this Premises due to the climate and longitude of the area.

Diseases and insect problems are prevented by spraying with plant therapy, applying beneficial nematodes, lady bugs, predator mites, and neem oil. All will be done in compliant with Humboldt County Department of Agriculture's Pesticide Application OIN #. The applicant and employees apply the herbicides, fungicides, and / or any other biocide on the farm. Each time a preventative is sprayed, it will be reported to the Department of Agriculture in their online portal.

Operations and Water Usage Calendar: -

January, February, March – Propagation Activities in greenhouse 3000 gallons

April – Propagation and immature plant nursery started – 2000 gallons

May – Nursery of immature plants becoming into teens – 7000 gallons

June – Planting of immature teens into final destination – 10000 gallons

July - Immature plants in nursery propagation - no lights

Immature plants being fed compost teas in final destination – 12000 gallons of water used August – Harvest of first destination planting Transition of immature plants to flowering plants and 2nd Final Destination

 \sim 16,000 gallons of water used

September – Plants in full bloom - ~ 12000 gallons of water used

October - Plants in bloom, ripening for harvest - ~8000 gallons used

November – Finishing maturing and harvesting plants – 7000 gallons used

December – Amending, clean up, and winterization – 1000 gallons used

Water Source and Water Storage Plan –

A rainwater catchment tank farm is going to the non-diversionary irrigation source of the whole facility. Twenty- four (30) 5,000 gallon rainwater catchment tanks will be placed on site and (2) 900 gallon feeding tanks, totaling where they will catch water off of buildings and greenhouses, to save water and irrigate the crop in a responsible and environmentally friendly manner.

A legacy man made pond on-site has been the source of irrigation in previous years, which is enrolled with the SWRCB.

All fee's and Site Management Plans have been submitted to the SWRCB. Attached is the State Water Resource Control Boards (SWRCB) Enrollment and Site Management Plan.

A well is being put in, in the 2020 season. This well will not be hydraulically connected to the river. Vic's Drilling is the contracted Well Company, and they are dealing with all permits with the DHHS regarding the well. A well completion report will be submitted upon execution. A well permit will be submitted within the next couple of weeks.

There will be 151,800 gallons total of water storage for irrigation usage.

1 Fire suppression tank is kept on-site for a minimum of 5,000 gallons dedicated solely to that purpose.

Water Irrigation Plan

Plants are watered every 2-3 days with compost teas, drip irrigation, and hand soaking, depending on weather. Foliar sprays are also introduced to the mix of irrigation. No inputs or cleaning products are applied thru the irrigation system.

Water conservation and containment measures are implemented including the use of hand and drip irrigation to prevent excessive water use, and the maintenance of a stable vegetated buffer between the cultivation area and the riparian zone. Implementation of dry farming techniques are applied, as this site uses stress cultivation techniques to allow the plants to acquire full strength with their feeder roots with water irrigation. The methodology of less water and more stress allows the plants to fully uptake the compost teas and nutrients when given to the plants, and train them to survive off little additional irrigation, and allow them to tap into the ground. This survival technique tends to trigger the plants to be heartier and healthier to make it thru extraneous heat and cool waves.

77,000 Gallons are use annually for water usage. Extreme measures of conscious agricultural techniques are used with drip irrigation methods, and compost tea methods for feeding and watering. When watered consciously, there is no need to use more than 1.62 gallons of water per plant, as these numbers are justified enough for proper irrigation for this site. This is a very water rich subsection of Humboldt, and the fertile soil and in ground methods are enough to maintain a facility with this much water, at this large capacity.

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Month	Water Usage
January	1000
February	1000
March	1000
April	2000
May	7000
June	10000
July	12000
August	16,000
September	12000
October	8000
November	7000
December	1000

Estimated monthly use:

Storm water Management Plan

See appended RPF Stephen Hohman, Timberland Conversion Report and DFW LSAA and Our Evolution Engineering's site management plan regarding storm water discharge best management practices. Drainage has been disconnected from the stream system.

Invasive Species Control Plan

See appended technical report from RPF, Stephen Hohman.

Materials Management Plan

Waste bins with lids are kept adjacent to cultivation sites and emptied out the day they are filled up or weekly.

Fertilizers and pesticides are currently stored in a designated storage shed with secondary containment to prevent contamination with run off.

Waste materials are stored in appropriate storage containers and self-hauled off weekly to a licensed waste transfer station.

A concrete pad with bear proof containers is being considered permit depending for future use on the premises.

Sewage Disposal Plan /On-site Wastewater Treatment System Information & Documentation Portable toilets are on-site and cleaned bi-weekly for employees.

An ADA bathroom connected to a permitted septic system may be developed for the future for the processing building, decision to put in an application for a structure building is permit pending. All sewage disposal systems (existing and proposed) are accurately shown on the accompanying site plan.

Soils Management Plan

Soil is fed with brewed compost teas that are nutrient rich and optimal for soil health. Compost, worm castings, bat guano, and trace minerals are used on this site. The soil is amended and re-used annually.

The observation of soil, a comparison of crop yields, observation of crop health and a soil testing service are all utilized to check nutrient levels and provide recommendations for proper amendments to re-condition the soil. Soils do not leave site and are all composted on-site.

Soil erosion mitigation efforts include the use of seeding, waddles, rice straw, and trenching on the premises to maintain any erosion that does occur. See attached Site Management Plan produced by OurEvolution Engineering to see soil procedures implemented to prevent site erosion.

Weed and Pest Management Plan

The weed control methods of hand-pulling, mulching, and weed eating are sued on site. The cultivation site is not affected by any known pests or pathogens.

The following strategies are used to control pest and pathogen damage to the crops:

Crop rotation, plant spacing, soil balancing, compost tea use, solarization, companion planting, hand picking, genetic resistance, monitoring, physical removal, habitat for natural enemies, release of pest predators, timing of planting, physical barriers, animal repellents and insect repellents.

Processing Plan

Processing will be done on site in a proposed 16 x 24 building on site. Rainwater catchment tanks will be placed at the bottom of the building, to catch rainwater for irrigation use. Machines and contracted distribution and processing companies will be used. Processing includes trimming, leaf removal, curing, and drying.

Parking & Employee Plan

See plot plan for parking locations. One parking space is provided for each expected employee.

There are 2 employees on site full time and a maximum of 6 seasonally.

The on-site staff hours present are usually 6:00 am to 10:00 pm 7 days a week, depending on time of season and natural light schedule.

Employee labor laws are posted in conspicuous view before entering the premises, and employee handbooks are kept on site with all standard operating procedures for emergencies and on-site knowledge.

Eye wash machines are installed and kept on the outside of the greenhouse and kept in close proximity to the pesticide and fertilizer storage. This ensures any applicant has the immediate accessibility to treat a potential risk problem before an ambulance or STAR (Southern Trinity Area Rescue) can reach the premises.

Energy Plan

Westpoint Timberland, Inc is investing in a 5 kW photovoltaic power system. They have a battery bank to use as primary system. There is an energy evaluation and size system analysis for the panels and batteries being evaluated by OurEvolution Engineering.

Security Plan

The premises is behind a long stretch of dirt road and locked gates.

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Neighborhood watch and guard dogs are implemented for any instant security personnel.

There will be no security lighting, security cameras, or security alarms. All buildings and structures will be locked and have access control.

Noise Source Assessment and Mitigation Plan

Fans and generators produce less than 35 decibels at tree line.

Ventilated structures will be used to mitigate and buffer generator noise and disturbance to natural surroundings and habitat.

Light Pollution Control Plan

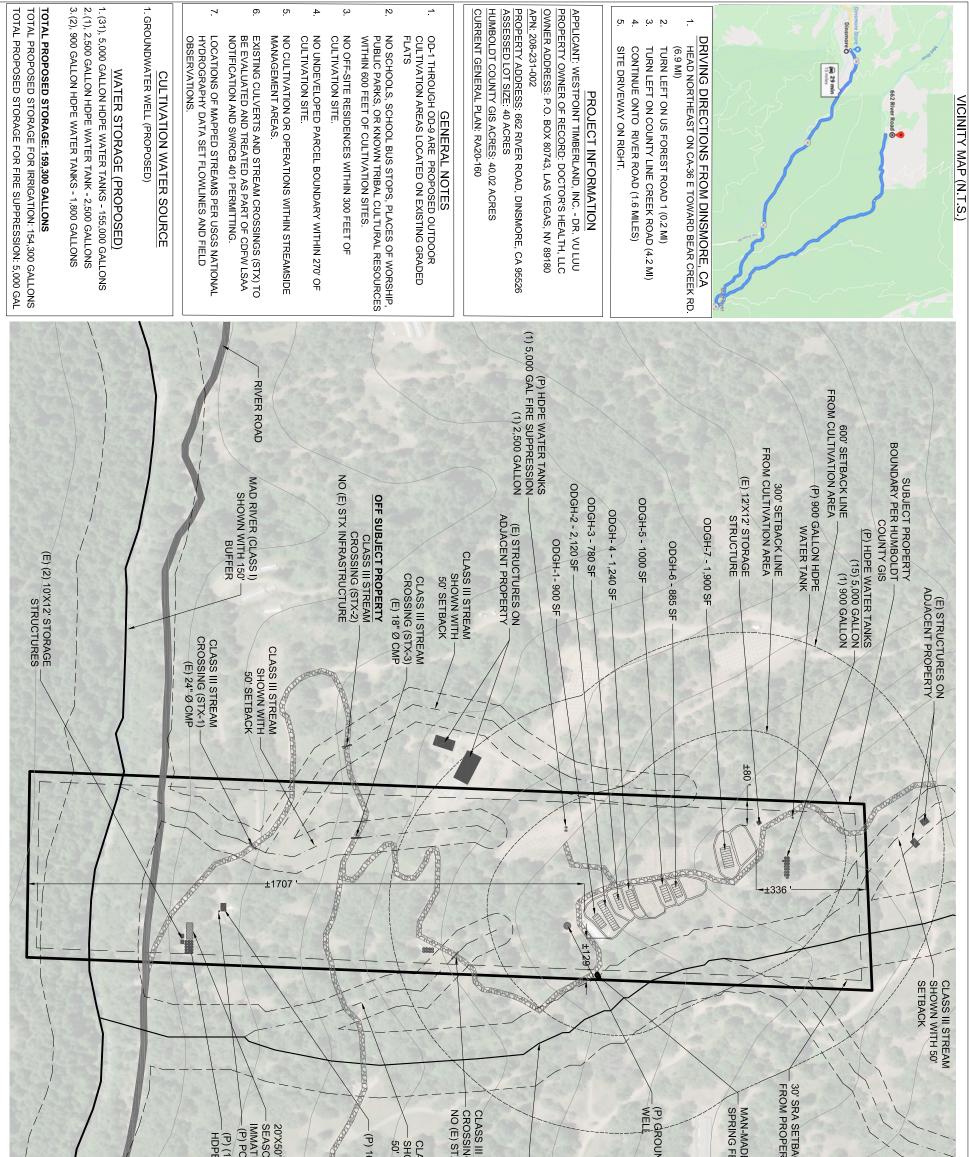
There is no additional lighting to this facility. This facility is run entirely off sunlight, and no greenhouses will have any electrical components in them. They are strictly for environmental concerns to protect against the extreme cold and heat waves. No tarps will need to be pulled at night, because all International Dark Sky Standards are met, with no additional lighting to the plants.

Storage (Junior Barn)	10 x 12
Storage (Junior Barn)	10 x 12
Proposed Shipping Container	8 x 20 .
Nursery	20 x 100

Existing and Proposed Structures on Site

ATTACHMENT 3

SITE PLAN



	' GREENHOUSE (N1) DNAL AREA CONTAIN URE PLANTS ONLY DRTABLE CHEMICAL 15) 5,000 GALLON E WATER TANKS	6'X24' DRYING	STREAM IG (STX-4) X INFRASTRUCTURE X III STREAM OWN WITH SETBACK	CLASS II STREAM - SHOWN WITH 100' SETBACK	50		NDWATER		ED POND		RTY LINE		(-2
	JSE (N1) S ONLY IEMICAL TOIL LON	IG-& STORAGE	AM	ACK	N1 TOTAL SEASON PLANT	IMMATURE PLANT AREA I.D.	IMMATU	TOTAL CULTI	ODGH-7	ODGH-6	ODGH-4	ODGH-3	ODGH-2	AREA I.D. ODGH-1	CULTIVATION	
500' RAPHIC SCALE		SE STRUCTURE			20' X 50' SEASONAL IMMATURE PLANT AREA	DIMENSIONS	TURE PLANT	CULTIVATION AREA	(LIGHT-DEP)	(LIGHT-DEP)	OUTDOOR (LIGHT-DEP)	OUTDOOR (LIGHT-DEP)	(LIGHI-DEP)		ION AREA	
		R			1,000 SF 1,000 SF	IMMATURE PLANT AREA	AREA	8825 SF	1900 SF	885 SF	1240 SF	780 SF	2120 SF	AREA 900 SF	SUMMARY	All adv.

		NO.	HISTORY / REVISION	BY CHK. DATE		
	WESTPOINT TIMBERLAND, INC/DR. VU LUU	1	CLIENT REVIEW COPY	ACS GAC 12/26/19		
	APN 208-231-002	2	SUBMITTAL #1	ACS GAC 04/23/20	OUREVOLUTION ENGINEERING, INC.	
		3	REVISION #1	ACS GAC 08/18/20	1821 BUTTERMILK LANE	
VVN OVED VUMBER V VUMBER 1 SHEET	662 RIVER ROAD, DINSMORE, CA 95526				ARCATA, CA 95521	
					360.791.3259	
	CULTIVATION SITE PLAN				ANDY@OUREVOLUTION.COM	
8 8 8 8						