

**Mitigated Negative Declaration for Wojcik Conditional Use Permits:
CUP-14-001, CUP-16-269, CUP-16-270 & CUP16-271**

McClellan Mountain Area, Bridgeville, California

1. Project Title:	Power Flower Farm and Wojcik Firewood Business Conditional Use Permits
2. Lead agency name and address:	Humboldt County Planning and Building, 3015 H Street, Eureka, CA 95501
3. Contact person and phone number:	Caitlin Castellano, 707-268-3731
4. Project Location:	Humboldt County, Bridgeville Area near Larabee Valley APNs 210-032-003, 210-033-003, 210-033-005, 210-250-028 & 210-250-029
5. Project sponsor's name and address:	Daniel and Robin Wojcik, 1920 McClellan Mountain Road, Bridgeville, CA 95526; Natural Resources Management Corporation (NRM Corp), 1434 Third Street, Eureka, CA 95501
6. General plan designation:	Residential Agricultural and Timberland
7. Zoning:	Unclassified and Timber Production Zone
8. Description of project: (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation.)	<p>This initial study complements a Mitigated Negative Declaration, adopted on August 5, 2015, for the McClellan Mountain Reclamation Plan (PR15-001) which provided for restoration and mitigation measures designed to offset previous impacts associated with commercially mining and processing peat moss that is in the process of completion.</p> <p>The projects analyzed in this initial study include:</p> <p>After the fact Conditional Use Permit (CUP14-001) to correct an unpermitted construction of a soil amendment processing building to be converted to fire wood production use.</p> <p>Three (3) cannabis cultivation CUPs:</p> <ul style="list-style-type: none"> • CUP 16-270; Application Number (Apps#) 11508 on APN: 210-033-003 known as "Commercial Flat Pond"; • CUP16-269; Apps# 11507 on APN: 210-250-028 & 210-033-005, known as "Carter Flat"; and, • CUP16-271; Apps# 11509 on APN 210-250-029, 210-250-028 & 210-033-005, known as Carter House Onsite RRR to Carter Flat. <p>Revegetation projects included in the Reclamation Plan to ensure the proposed firewood and cannabis operations are consist and can co-exist:</p>

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:


The environmental factors checked below would be potentially affected by this project:

<input checked="" type="checkbox"/>	Aesthetics	<input type="checkbox"/>	Agriculture and Forestry Resources	<input checked="" type="checkbox"/>	Air Quality
<input checked="" type="checkbox"/>	Biological Resources	<input checked="" type="checkbox"/>	Cultural Resources	<input checked="" type="checkbox"/>	Energy
<input checked="" type="checkbox"/>	Geology/Soils	<input checked="" type="checkbox"/>	Greenhouse Gas Emissions	<input checked="" type="checkbox"/>	Hazards and Hazardous Materials
<input checked="" type="checkbox"/>	Hydrology/Water Quality	<input type="checkbox"/>	Land Use/Planning	<input type="checkbox"/>	Mineral Resources
<input checked="" type="checkbox"/>	Noise	<input checked="" type="checkbox"/>	Population/Housing	<input checked="" type="checkbox"/>	Public Services
<input type="checkbox"/>	Recreation	<input checked="" type="checkbox"/>	Transportation	<input checked="" type="checkbox"/>	Tribal Cultural Resources
<input checked="" type="checkbox"/>	Utilities/Service Systems	<input checked="" type="checkbox"/>	Wildfire	<input checked="" type="checkbox"/>	Mandatory Findings of Significance

DETERMINATION:

On the basis of this initial evaluation:

<input type="checkbox"/>	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
<input checked="" type="checkbox"/>	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
<input type="checkbox"/>	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
<input type="checkbox"/>	I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
<input type="checkbox"/>	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required

Signature: 	Date: 2/27/19
Printed Name: Caitlin Castellano	For:

is located (see figure 2). Cannabis is full sun outdoor and grown in large tubs. Plants are transplanted into the tubs in May and harvested in October/ November. In the winter, the pots are covered with either additional rice hull or cocoa bean hull mulch, soils are reused each year. Cannabis is processed in the building marked #3 on the Location Table of the Plot Plan. Cannabis is processed with minimal human involvement, using sterile trim machines. A 10kw diesel Whisperwatt generator is the primary source of power for Cannabis processing and drying which takes place during October and November each year.

Water for irrigation is currently supplied from the groundwater well located on Commercial Flat adjacent to the cultivation (See figure 2 for location). This well supplies water to the commercial buildings as well. Water is pumped from the well to a 5000 gallon water tank using a gas powered Honda EM 6500 SX generator. The generator runs approximately 17 hours a month between May and October (100 hours total) over the 6 month growing season. The tank is fitted with an automatic shut-off float valve and buoy to ensure water conservation. Plants are watered by hand. Approximately 66,500 gallons are used yearly for irrigation which is approximately 4.23 gallons per square foot.

A 40 million gallon deep lake is adjacent to Commercial Flat. The lake, known as Processing Pond, spans nearly five acres and is approximately 47 feet deep in the center. This lake was a fen before the peat was mined out of it. It is spring fed and generally maintains its water level though out the year. There is an overflow pipe which drains into a natural "sink" down a hillside, where the water dissipates onto another near ridge flat and is absorbed back into the terrain. This overflow does get some annual use only when the rainy season is heavy. The area is hydrologically rich in groundwater. The applicant is in the process of obtaining an appropriative right for the lake, and in the future (3 to 5) years, pending the outcome of the appropriative right, the lake maybe used as a water source for the project. If the lake is used in the future, water will be pulled from the reservoir using an electric pump which restricts the flow down to 10 gallons per minute. This pump will run by a 4000 watt gasoline generator which is housed in a 8x9 ft. metal quonset-style shed (See Plot Plan for location). Timing and duration of use will be very similar to the generator currently used to pump water from the well: approximately 17 hours a month between May and October.

Fertilizer used for cultivation is primarily used to amend the soil prior for planting and for top dressing and includes: worm castings, seabird guano, and potash. Seabird guano and potash are also applied later in the growing season. The guano and potash are mixed in a 2000 gallon water truck and applied by hand to ensure no runoff is created. For fungal or pest problems needing treatment plants are sprayed with OMRI listed neem oil, Green Cure (baking soda) and Armory (beneficial bacillus blend). The organic fungicide sprays are administered with backpack misters, and the correct dosages are weighed (based on application directions) on a gram scale. The dosages are put into small ziploc bags and used one at a time when mixing batches in the backpack mister. Any pre-measured bags not used that day are labelled and stored in ice chests in Building #3. No hazardous compounds are used in the cultivation practices.

The garden site is in a remote rural location. It is fenced, isolated from view and cannot be easily accessed from any public road or location. There is no foot traffic through or near the property. During the drying phase, all flower material will be stored in the secure buildings on the commercial flat. The entire operation is on private property, behind locked gates. The only way in or out for the public is by using McClellan Mountain Road. The access point onto private property is monitored constantly by four security cameras. Photos are taken of all who come and go. Security lighting is proposed to be installed around the cultivation and processing areas. This lighting will be shielded and pointed down into the site.

Irrigation water for the Carter Flat cannabis projects is supplied from a permitted groundwater well located adjacent to the pre-existing cultivation (See Plot Plan for location). Water is pumped from the well to a 5000 gallon water tank using a 3500 watt Honda gasoline generator housed in an 8x10 foot quonset-style metal shed. The generator is in an emergency containment pan and the ends of the shed are open to allow for air circulation and proper venting. Currently this generator runs for approximately 38 hours per month between May and October (225 hours total a year). The generator uses approximately 120 gallons of fuel per year, which is stored at the commercial site and brought to this parcel in small gas cans as needed. In the future there are plans to replace this generator with a solar powered pump. The water tank is fitted with an automatic shut-off float valve and buoy to ensure water conservation. Plants are watered by hand. Approximately 206,860 gallons (6.5 gallons per square foot) are currently used yearly for irrigation. When the onsite RRR to Carter Flat is completed and has 43,560 square feet of cultivation, it is estimated that 338,199 gallons (7.7 gallons per square foot) will be used annually. The well produces 30 gallons per minute (gpm) and will be able to supply all irrigation water.

Fertilizer used for cultivation at the Carter Flat is identical to that used in the Commercial Flat cultivation project described above. All fertilizers and chemicals used at Carter Flat are stored in Building #3 on the Commercial Flat. No hazardous compounds are used in the cultivation practices.

The garden site is in a remote rural location. It is fenced, isolated from view and cannot be easily accessed from any public road or location. There is no foot traffic through or near the property. During the drying phase, all flower material will be stored in the secure buildings at Commercial Flat. The entire operation is on private property, behind locked gates. The only way in or out for the public is by using McClellan Mountain Road. The access point onto private property is monitored constantly by four security cameras. Photos are taken of all who come and go. All cannabis produced at the Carter Flat are currently processed in the facility at the commercial flat. As per the State Cannabis regulations security lighting will be installed around the cultivation and processing areas. This lighting will be shielded and pointed down into the site.

Generally 1-2 people work at the garden site and processing facility during the farming season. When the Onsite RRR project is completed and built out, up to 6 people may be utilized. They are either trade workers or employees on payroll. No employees are housed on the property.

Power Flower Farm CUP16-271, Apps# 11509, Carter House Onsite RRR to Carter Flat Cannabis Cultivation

This project is located within the Little Van Duzen watershed on APN 210-250-029 and proposes to merge two legal parcels consisting of APNs 210-033-005 and 210-250-028 (known as Carter Flat; 96 acres) and 210-250-029 (known as Carter House; 171 acres) to create one 267 acre parcel. The parcel merger will allow for implementation of the proposed onsite remediation, relocation and restoration (RRR) of seven (7) pre-existing outdoor cultivation sites to an existing open flat on APN 210-033-005, adjacent the existing cultivation on 210-250-028 (Carter Flat). Cannabis cultivation on the merged parcels cannot exceed one acre (43,560 sf). As a result, only 12,060 sf will be relocated but 22,000 sf of distributed areas will be remediated and restored back to their natural state. The existing cultivation areas are scattered around and/or within a large wetland area and along old logging roads in a heavily forested area. Irrigation water was sourced from non-permitted surface water diversions and the sites are located on slopes greater than 15%. Onsite RRR will provide a direct environmental benefit by eliminating wildlife habitat fragmentation and from human

Reclamation Plan Re-vegetation Projects per DEJ

Home and Processing Pond Planting:

These projects are located at the Home Pond and the Processing Pond adjacent to Commercial Flat (figure 1) and is required restoration under the DEJ. It is estimated that 50 plants or less will need to be installed to accomplish the restoration of both ponds because most replanting has been completed per NRM's McClellan Mtn. Reclamation Plan Monitoring Report dated June 11, 2018.

Home Pond is located near the project sponsor/property owner's residence (figure 1). The unvegetated portion of the shoreline around the home pond will be revegetated with native riparian shrub plantings. The area needing to be re-vegetated is approximately 0.77 acres. A combination of willow stakes and other riparian shrubs may be used. Plants will be installed with hand tools. No water or fertilizer will be supplied to the plantings.

Processing Pond (or lake) is located next to Commercial Flat (figure 1). The Reclamation Plan requires 1.8 acres be "reclaimed" with riparian species around the shoreline of the lake. The map in the Reclamation Plan showing the revegetation area around the pond has no scale but appears to show approximately a 100 foot buffer around the pond to be revegetated. This entire buffer area is approximately 5.3 acres, far more than the 1.8 acres listed in the Reclamation Plan. This may be because the majority of the 100 foot buffer is already naturally vegetated. Based on recent site visits by NRM Corp., it is mostly the north eastern portion shoreline that needed re-planting. A combination of willow stakes and other riparian shrubs may be used. Plants will be installed with hand tools. No water or fertilizer will be supplied to the plantings.

Carter Flat Restoration:

The Reclamation Plan describes 5.72 acres as needing to be "reclaimed" at the Carter Flat. It appears that, based on the map provided in the Reclamation Plan, 3.63 acres (158,400 square feet) of this was to be restored as native prairie. The Reclamation Plan calls for the area to be revegetated as "forest opening with grass/ shrub cover" after removal of stock-piled peat moss that, will be returned to the Van Duzen Fen after its restoration is complete. The Reclamation Plan recommends native grasses *Bromus carinatus* and *Elymus glaucus* be planted in the prairie areas at 30 pounds per acre. This planting will take place the winter following the Van Duzen Fen restoration. Additional areas (the remaining 2.09 acres) on the Carter Flat were to be re-planted with Douglas fir trees. This planting of fir trees has already taken place and been signed off on by Cal Fire. See figure 3 showing revegetation areas.

SOURCE/REFERENCE LIST

The following documents were used in the preparation of this document.

Diller, J.S., 1902, Topographic Development of the Klamath Mountains, Bulletin of The United States Geological Survey, No. 196.

Jennings, C.W., 1994, Fault activity map of California and adjacent areas, California Department of Conservation, Division of Mines and Geology, Geologic Data Map Series, Map no. 6.

McLaughlin, R.J., Ellen, S.D., Blake, M.C., Jayko, A.S., Irwin, W.P., Aalto, K.R., Carver, G.A., and Clark, S.H. 2000. Geology of the Cape Mendocino, Eureka, Garberville and Southwestern part of the Hayfork – 30x60 minute Quadrangles and Adjacent Offshore Area, Northern California, U.S. Geological Survey, Miscellaneous Field Study 2335, 1:100,000.

Whittington, P.N., and Price, J.S. 2006. The effects of water table drawdown (as a surrogate for climate change) on the hydrology of a Fen peatland, Canada. Hydrological Processes, v. 20, pp. 3589-3600.

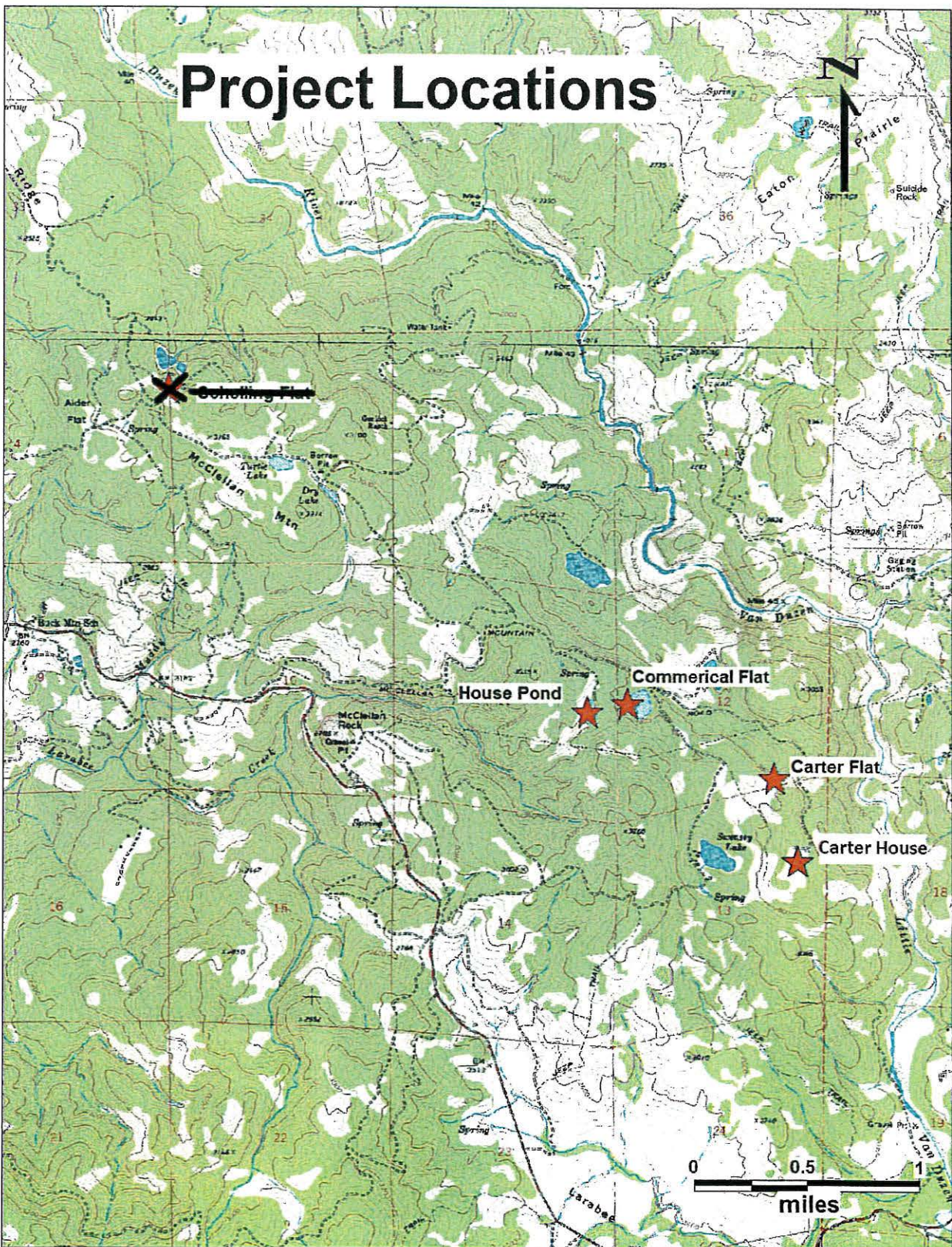


Figure 1: Project Locations Map



Figure 3: Carter Flat Layout showing cannabis cultivation and restoration areas.

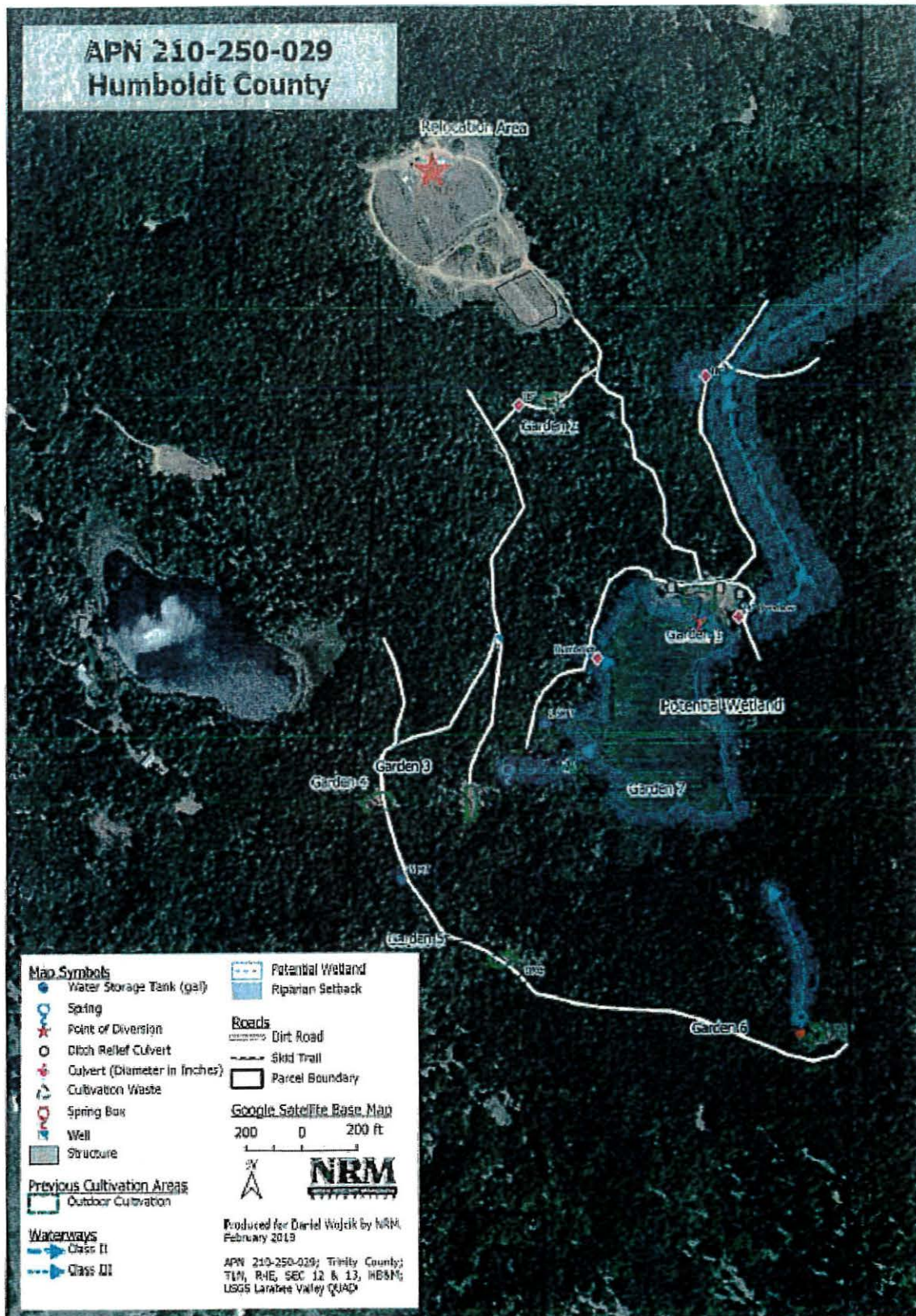


Figure 6: Carter House Onsite RRR of Scattered Pre-Existing Grow Sites to Carter Flat.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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II. AGRICULTURE AND FOREST RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and the forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

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|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Result in the loss of forest land or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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IV. BIOLOGICAL RESOURCES. Would the project:

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| a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
VIII. GREENHOUSE GAS EMISSIONS. Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) result in a substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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XIV. POPULATION AND HOUSING. Would the project:

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

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b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

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XV. PUBLIC SERVICES.

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

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Fire protection?

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Police protection?

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Schools?

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Parks?

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Other public facilities?

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XVIII. TRIBAL CULTURAL RESOURCES.

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

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ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

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XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:

b) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction or relocation of which could cause significant environmental effects?

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b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry years?

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Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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XIX. MANDATORY FINDINGS OF SIGNIFICANCE

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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ancillary propagation nursery greenhouse (35ft by 60ft) located on Carter Flat. This greenhouse will supply nursery stock for both the Commercial Flat and the Cater Flat cultivation areas. Currently there are no lights on site. A few (5 to 10) T5 220 watt florescent lights may be added in the nursery greenhouse for the 2019 season once the blackout curtain is installed. Over the next five years, pending approval, the Carter House Onsite RRR cultivation relocation to the Carter Flat will increase demand for nursery stock so the number of lights in the nursery will be increased to a maximum of 24, T5 220 watt florescent lights. A blackout curtain from FarmTek (manufacture of the greenhouse), will be purchased and installed before light use begins. At both cannabis sites, security lighting will be installed. It will be shielded and point down into the cultivation areas so it will not cause substantial light or glare to the surrounding area.

Cumulative Impact:

Mitigation measures for cannabis sites to keep any light from escaping between dusk and dawn will prevent impacts to aesthetics from these three projects. Given the lack of historical complaints on similar adjacent projects in the area it is perceived that it will be mitigated adequately. Land use in the surrounding area is a mixture of private agricultural and timberland lands. As stated, the proposed project will be comprised of operational activities that are consistent with the historic and current setting as well as maintaining the rural culture of the surrounding properties and therefore as proposed would not result in a cumulatively considerable impact.

Mitigation:

Mitigation Measure – Aesthetics – 1. The ancillary propagation greenhouse (nursery) using supplemental light will be equipped with automated systems to pull black out tarps over the structure. The blackout tarps will be used to fully cover the greenhouse whenever lights are being used from one hour before sunset till one hour after sunrise. No light will be allowed to escape from the greenhouse during dusk, dawn, and nighttime hours. No supplemental lighting will be used in the proposed greenhouses at the Carter Flat as part of CUP16-271 Carter House Onsite RRR to Carter Flat project. Building plans shall incorporate the automated tarping/blackout system.

II. AGRICULTURE AND FOREST RESOURCES.

Findings:

- a) The project will not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use: No impact.
- b) The project will not conflict with existing zoning for agricultural use, or a Williamson Act contract: No impact.
- c) The project will not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)): No impact.
- d) The project will not result in the loss of forest land or conversion of forest land to non-forest use: No impact.
- e) The project will not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use: No impact.

Setting:

Humboldt County has not been mapped by the Farmland Mapping and Monitoring Program (www.consrv.gov). According to the Humboldt County GIS, there are no mapped prime agricultural soils within the project area or vicinity that would be impacted by the proposed project (see figure 6).

The coast ranges of northern California are the most rapidly eroding region of comparable size in the United States; this area has undergone recent uplift and is underlain by highly deformed and faulted sandstone

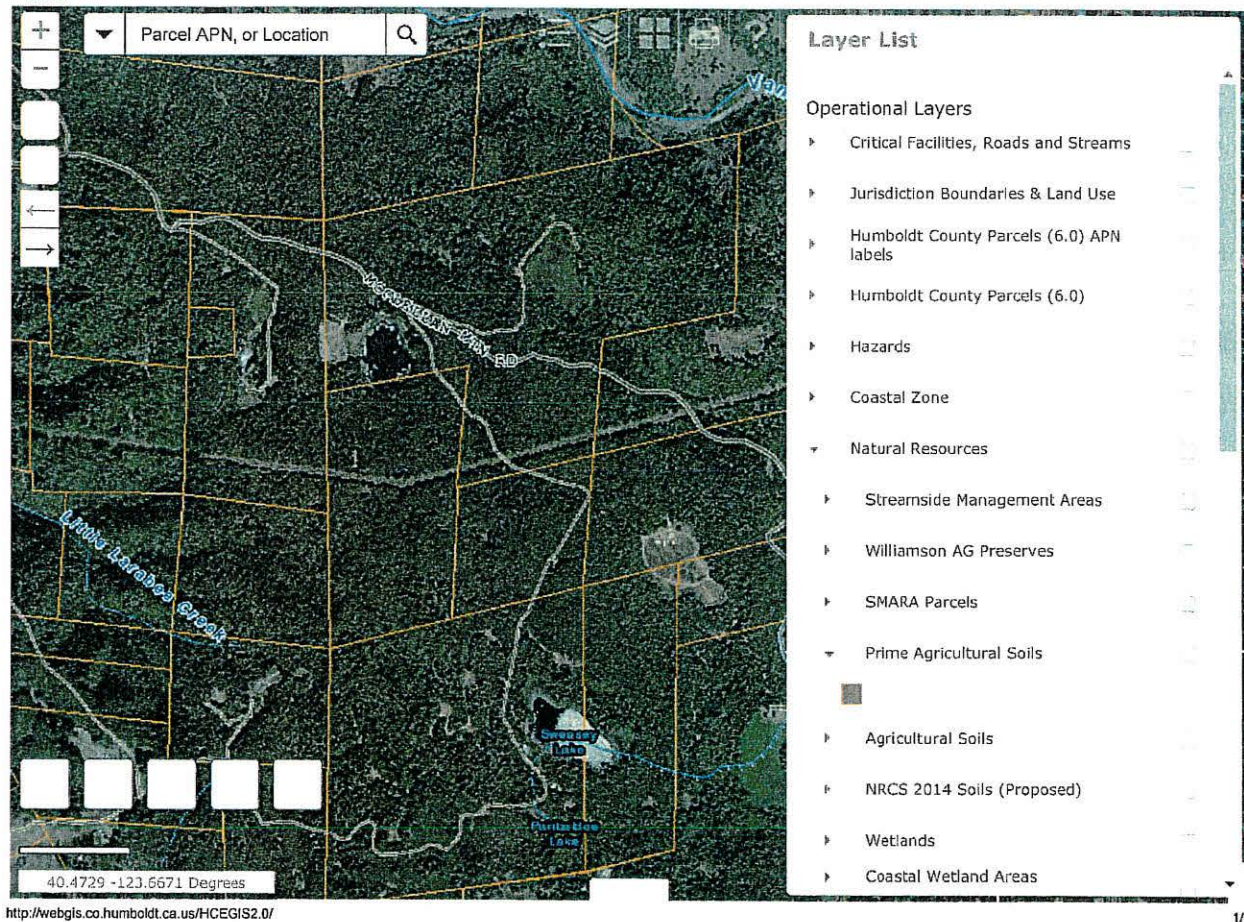


Figure 6. No prime agricultural soils mapped in the project areas. (source Humboldt County Web GIS)

Analysis:

- These projects will not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use. There are no prime agricultural soils or farmland in the project areas.
- Humboldt County has not been mapped by the Farmland Mapping and Monitoring Program (www.consrv.gov). However, no prime agricultural soils have been identified within the project areas. No prime agricultural soils are mapped by the county GIS in the project area.
- These projects will not conflict with existing zoning for timberland or agricultural use, or a Williamson Act contract. The project is consistent with the current land use and zoning. Surrounding areas will not be affected by the proposed operation. According to Humboldt County Web GIS there is no Williamson Act Contract applicable to the project site.
- The projects will not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use. No farmland will be converted. A portion of the Carter Flat was originally converted from timberland to open space with a legal 3 acre conversion permit. Expansion of the Carter Flat to its present size occurred illegally and the Wojciks completed a settlement agreement (CP13-08) with Cal Fire in September 2013. Areas that were cleared outside of the 3 acres have already been restocked per the settlement agreement. These projects will not convert any additional timber land. Use of existing road access has and will be

Operations associated with the projects will not result in a significant increase in truck traffic levels. Employee travel to and from work sites for firewood and cannabis projects is estimated at between one (1) and six (6) roundtrips by car per day between the months of April and November (248 to 1488 round trips per year). Additionally, the cannabis and firewood projects will need to bring in supplies and haul out product. The firewood project will haul out fifty (50) F550 flatbed truckloads of cut firewood a year. The cannabis projects will require approximately ten (10) pickup loads of supplies a year. Additionally, processed cannabis will be hauled off site in ten (10) van trips per year. Minimal garbage (approximately two 8'x14' trailer loads) will be created by the project, which will be hauled to Eel River Recology in Fortuna CA. Overall to bring in supplies and haul out products out from both the cannabis and firewood business will be around 72 vehicle trips a year. According to the 2016 Traffic Volumes on California State Highways report by Cal Trans the Annual average daily traffic (which is the total traffic volume for the year divided by 365* days) is 1450 cars counted at Bridgeville. This works out to be 529,250 cars per year at this spot. Therefore, these projects would account for only 0.05 and 0.3 percent of the total traffic volume. Due to the small scale of the project, emissions from vehicles will be insignificant, especially when compared to the amount of traffic that already occurs on Hwy 36.

Activity in the project area would continue to require meeting NCUAQMD Air Quality standards, including Regulation 1, which prohibits nuisance dust generation and is enforceable by the District. The North Coast Unified Air Quality Management District currently enforces dust emissions utilizing the CA Health and Safety Code (Section 41701) which limits visible emissions that exceed 40% density to a maximum of 3 minutes for any one hour period. For long term cannabis and firewood project operations the private road system used will be watered as necessary to eliminate dust from vehicle traffic. Water will be sourced from permitted wells on Commercial Flat and Carter Flat. Construction of outdoor greenhouses and restoration activities may produce high fugitive dust levels during certain times of operation. The construction of the additional greenhouses at the carter flat will not require any grading. During any construction period roads will be watered as needed to keep dust down. Water will come from the permitted ground water wells.

Generators will be used for firewood and cannabis projects. A 45kw Whisperwatt generator is used for the firewood business. Diesel engines that are 50 brake-horsepower or greater need a permit from the Air District. This generator will require a Stationary Source Permit.

On the commercial flat A 10kw Whisperwatt generator is the primary source of power for cannabis processing and drying. This will only be used when cannabis is being processed (October and November). Water for the project is currently supplied from the ground water well located on the same flat as the cultivation (See Plot Plan for location). This well supplies water for irrigation, and the commercial buildings. Water is pumped from the well to a 5,000 gallon water tank using a Honda EM 6500 SX generator. The generator runs approximately 17 hours a month between May and October (100 hours total over the 6 month growing season). In the future there are plans to replace this generator with a solar powered pump. These generators do not require a permit from the Air District. Their use will be sporadic and will not have a significant effect on air quality.

At the carter flat nurse lights will be primary powered by a solar system. A small (Honda 3000 watt or similar) gasoline generator may be used occasionally as back up to charge the battery system if there is not enough sun. Water is supplied from the onsite well. Water is pumped from the well to a 5000 gallon water tank using a Honda EM 3500 gasoline generator housed in an 8x10 foot quonset-style metal shed. Currently this generator runs for approximately 38 hours per month between May and October (225 hours total a year). In the future there are plans to replace this generator with a solar powered pump. This replacement will take place prior to initiating cultivation activities for the onsiteRRR expansion on the carter flat. These generators do not require a permit from the Air District. Their use will be sporadic and will not have a significant effect on air quality.

As proposed these projects will not result in a violation of ambient air quality standards either individually or cumulatively in the area. The only sensitive receptors are the residences in the vicinity. Due to the limited hauling activity that will occur, the watering of roads, and the rapid dissipation of the dust and the low density of residences, impacts will not be significant.

IV. BIOLOGICAL RESOURCES

Findings:

- a) The project will not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service: Less than significant impact with mitigation.
- b) The project will not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service: Less than significant impact with mitigation.
- c) The project will not have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means: Less than significant impact.
- d) The project will not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites: Less than significant impact.
- e) The project will not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance: No impact.
- f) The project will not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan: No impact.

Setting:

The following information is from a report titled "Biological Report for Special Status Species and Habitat for the Carter Flat RRR" prepared by NRM Corp. on December 18, 2018:

VEGETATION

All projects are set in previously disturbed areas with little to no vegetation present. The Commercial Flat and Carter Flat are both on preexisting and highly disturbed sites. The Commercial Flat, which is the site of the firewood business and one cannabis cultivation operation, has almost no vegetation growing on the flat and the cannabis cultivation and commercial buildings are already existing. The Carter Flat is highly disturbed. The current cultivation area on the Carter Flat is 31,500 square feet. The area where the revegetation project on the Carter Flat will take place is currently covered with piles of peat which will be removed and transported to the Van Duzen Fen once restoration activities are near completion. The 12,060 sf future onsite RRR site will be situated around the existing ancillary nursery greenhouse. Total cultivation at the Carter Flat would be one acre (43,560 square feet) after completion of the Carter House Onsite RRR to Carter Flat project (CUP16-271, Apps#11509). This whole area is disturbed and has little vegetation. A botanical assessment for the Carter Flat area was done on April 27, 2018. The only vegetation evident at the time of the site visit was annual grasses (not flowering) and very sparse, sickly and dead *Baccharis pilularis*. The one exception is along the small scarp at the grade change running east to west along the middle of the flat. Here, several healthy madrones and manzanitas are established on the scarp face. Both cannabis cultivation sites are located outside of this grade change area. The revegetation projects around the two ponds (House Pond and Commercial Pond) and the Carter Flat will restore these areas to native vegetation.

Locations of known occurrences of special status plants species are summarized in Table 1 and Figure 7 and Figure 8 below.

Scientific Name	Common Name	Status	Habitat
<i>Rana boylei</i>	foothill yellow-legged frog	SSC	Partly-shaded, shallow streams and riffles with a rocky substrate in a variety of habitats.
<i>Rhyacotriton variegatus</i>	southern torrent salamander	SSC	Coastal redwood, Douglas-fir, mixed conifer, montane riparian, and montane hardwood-conifer habitats. Old growth forest.
<i>Emys marmorata</i>	western pond turtle	SSC	A thoroughly aquatic turtle of ponds, marshes, rivers, streams and irrigation ditches, usually with aquatic vegetation, below 6000 ft elevation.
<i>Falco peregrinus anatum</i>	American peregrine falcon	SSC	Coastal redwood, Douglas-fir, mixed conifer, montane riparian, and montane hardwood-conifer habitats. Old growth forest.
<i>Strix occidentalis caurina</i>	Northern Spotted Owl	T, CA-T	Old-growth forests or mixed stands of old-growth and mature trees; occasionally in younger forests with patches of big trees
<i>Arborimus pomo</i>	Sonoma tree vole	SSC	North coast fog belt from Oregon border to Sonoma County. In Douglas-fir, redwood & montane hardwood-conifer forests.
<i>Pekania pennanti</i>	fisher - West Coast DPS	SSC	Intermediate to large-tree stages of coniferous forests and deciduous-riparian areas with high percent canopy closure.
<i>Atractelmis wawona</i>	Wawona riffle beetle		Aquatic; found in riffles of rapid, small to medium clear mountain streams; 2000-5000 ft elev.

Status code: For Plants **1B** = rare, threatened, or endangered in CA and elsewhere; **2** = rare, threatened, or endangered in CA, but more common elsewhere; **3** = plants about which more information is needed; a review list; **4** = watch list. For Wildlife **SSC** = CDFW species of special concern; **T** = Federally threatened; **CA-T** = California threatened

Wojcik
APNs 210-033-003, 210-033-006,
210-250-028, 210-250-029
USGS Larabee Valley Quad
T1N, R4E Sec. 12 & 13 HB&M

NSO AC Locations

-  NSO Historic AC
-  1.3-mile Buffer Around Project Areas
-  Parcel Boundaries
-  Project Areas

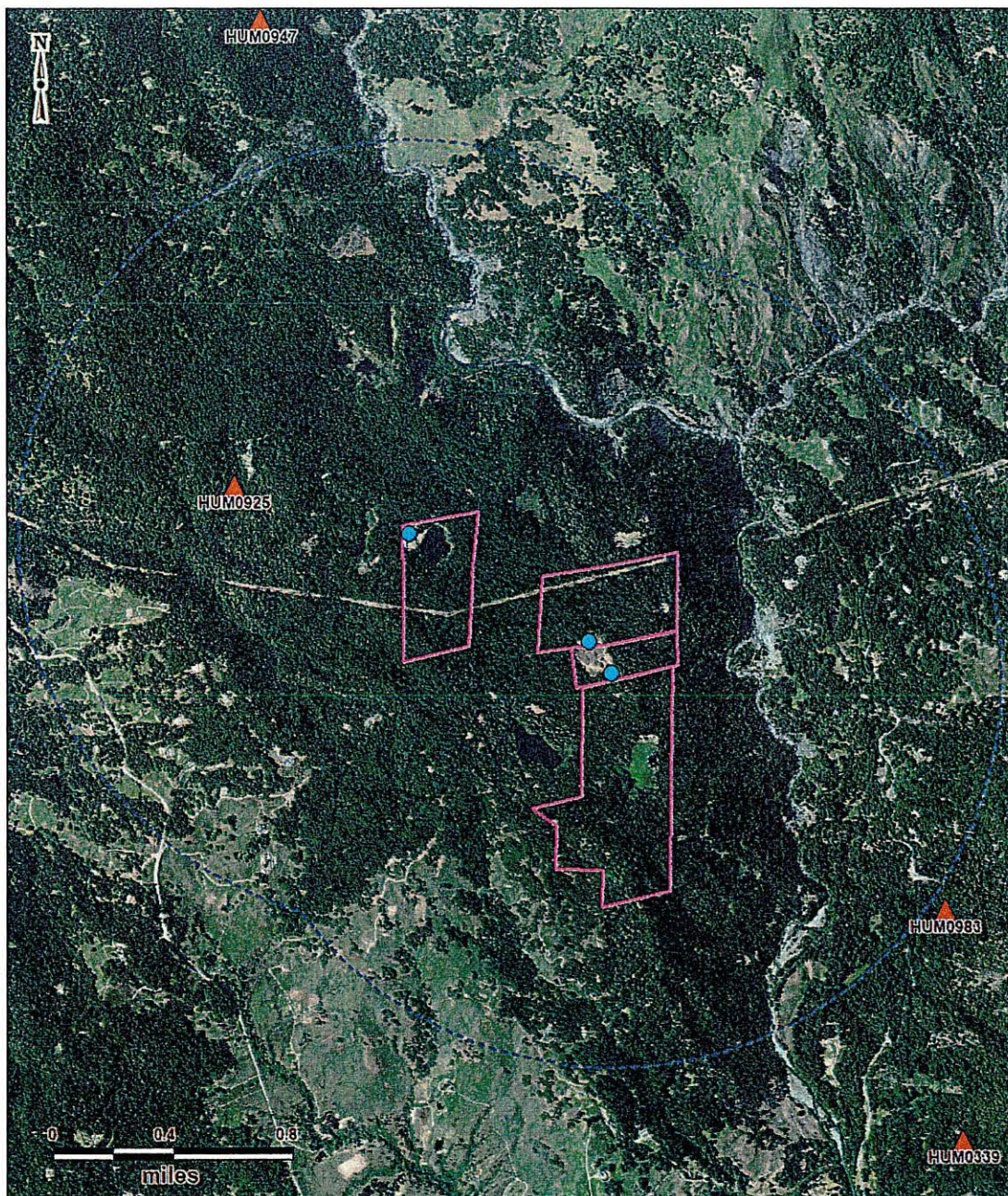


Figure 9. NSO AC locations in the vicinity of the cannabis, firewood, and Carter Flat and pond revegetation projects. Data sourced from the CNDDB.

a LSAA prior to initiation of any work and pre construction surveys for amphibians will occur. If amphibians are present, CDFW will be consulted for relocation assistance prior to construction. Therefore, any disturbance to the habitat will be low impact and very brief. The Carter Flat revegetation project will take place on the high disturbed pre-existing flat. Currently the piles of peat are providing little to no vegetation or habitat value. In the long run these revegetation projects will improve wildlife habitat in the area once the Van Duzen Fen is restored and the peat piles are moved back into it. The firewood and cannabis projects are all taking place in areas that are already disturbed. The direct footprint of these projects will not disturb any sensitive species habitat and because no vegetation removal is associated with any of these projects, there will be no impact to sensitive plant species.

The replanting of the riparian vegetation around the ponds (house and commercial) and restoration work for the three (3) scattered pre-existing Carter House grow sites are the only projects taking place in or near aquatic habitats, one of which will take place when the stream is dry during the summer and the other two will occur when it is confirmed that no impact to special status amphibians are present through consultation with CDFW. The revegetation will be low impact and completed with hand tools. None of the other projects (firewood, cannabis and revegetation at the Carter Flat) will have any effect on aquatic or riparian habitats and will not have any impacts on summer-run steelhead trout, Pacific tailed frog, foothill yellow-legged frog, southern torrent salamander, western pond turtle, or Wawona riffle beetle.

Light leakage from the ancillary nursery greenhouse on the Carter Flat, or security lighting at either cannabis project could possibly impact northern spotted owls, martin, or fisher in the vicinity. At both cannabis sites, security lighting will be installed so that the lighting will be shielded and point down into the cultivation areas so it will not cause substantial light or glare and will not have a significant impact on special status species.

Mitigation Measure - Aesthetic -1 will require that the existing ancillary propagation greenhouse will be equipped with automated systems to pull black out tarps over the structure so that no light will be visible during dusk, dawn and nighttime hours. This mitigation measure will ensure that there are no impacts to wildlife from the use of lights in the nursery greenhouse that will be utilized by all of the proposed cannabis cultivation operations.

Noise resulting from the projects has the potential to impact sensitive species directly as well as their habitat. Noise will be generated during two different project phases: daily project operations for the firewood and cannabis projects, greenhouse construction and restoration work associated with the Carter House Onsite RRR to Carter Flat Project. The revegetation projects will not generate any significant noise.

Project Operations

The main source of noise from the cannabis and firewood projects is generator use and general noise from human activity. The cannabis projects are both "outdoor" projects, meaning there are no lights used in flowering stage. Supplemental Lights will only be utilized in the ancillary propagation/nursery greenhouse on the Carter Flat which will be powered by a solar system. The larger 10kw whisper watt generator on the Commercial Flat is used to supply power for drying and processing cannabis product. Drying and processing takes place only during the months of October and November. The generator is rated at 61 decibels at 23 feet. The Honda 3500 and 6500 are used for the well pumps at the commercial and carter flat. At the commercial flat the Honda 6500 runs approximately 17 hours a month between May and October (100 hours total over the 6 month growing season). At the Carter Flat the Honda 3500 runs approximately 38 hours a month between May and October (225 hours total over the 6 month growing season) The Honda EM 6500 and the EM 3500 generators are rated at 64 decibels at 9 feet. The firewood project uses a 45kw whisper watt. This generator will run approximately 20 hours per month during the months of December through March. See Table 2 for estimated noise levels at different distances.

North Spotted Owl

According to USFS's 2006 document titled: Transmittal of Guidance: Estimating the Effects of Auditory and Visual Disturbance to Northern Spotted Owls and Marbled Murrelets in Northwestern California, disturbance may reach the level of take when at least one of the following conditions is met: 1) Project-generated sound exceeds ambient nesting conditions by 20-25 decibels (dB). 2) Project-generated sound, when added to existing ambient conditions, exceeds 90 dB. 3) Human activities occur within a visual line-of-sight distance of 40m (131 feet) or less from a nest. The closest known NSO Activity Center (AC) to the Carter Flat is 6000 feet (1.1 miles) away. The Carter Flat projects should have no impact on this AC. The closest AC to the commercial flat is 3060 feet (0.6 miles) away. The cannabis project at the Commercial Flat should have no effect on this AC. The cannabis project as written has the potential to impact NSO habitat by increasing the noise levels in the 1500 foot (0.3 mile) buffer around the projects. The 10kw whisper watt has the most impact in terms of its potential to increase noise levels at greater distances. It may raise the noise level by 25dBA within 1500 feet of the project area. This generator however is only used in October and November, outside of the NSO breeding season (March- August). Therefore, using the generator at this time should have no impact on NSO. The two well pumps generators, which would run during the spotted owl breeding season, have the potential to impact a 1000 foot (0.2 miles) buffer around each site. In order to mitigate this impact, the two Honda generators will be removed and replaced with silent solar powered well pumps.

The firewood project's main source of noise will be the 45kw whisper watt generator. Firewood will be processed in the winter time - December through March. The NSO breeding season is February 1st through August 31st and noise from firewood processing would overlap with the breeding season in February and March. An additional sound attenuation enclosure will be purchased or built for this generator. The sound attention will need to achieve a reduction of 30 decibels and this would reduce noise from the firewood project to 18 decibels at 184 feet. The firewood project would then impact a buffer of less than 200 feet of NSO habitat around the project area which is 1.5 acres. This will have a less than significant impact on spotted owls.

The Carter House scattered grow site restoration is a short term temporary project with the potential to create noise disturbance only. No NSO habitat is being removed.

Humboldt Marten, Fisher, and Sonoma tree vole

Humboldt Marten, Fisher, and Sonoma tree vole habitat is found in areas surrounding the firewood, and cannabis projects. These projects will all take place in already de-vegetated areas, so no habitat will be directly removed. Project generated sound however could impact these species. For the cannabis and firewood projects the closest known vole location is one mile (5,282 feet) away (CNDDDB). Noise at this location will be less than 20 decibels. The nearest known Humboldt Marten and Fisher location is at least over two miles away (CNDDDB). The 10kw whisper watt generator only runs during the months of October and November, well outside of the Humboldt Marten and Fisher breeding season (February through May), and the vole's main breeding season (February through September; although voles do breed year-round but breeding is concentrated during this time). The cannabis project will have no impact on known Humboldt Marten, Fisher, or Vole occurrences. It is possible the noise from the projects could impact unknown occurrences in the habitat close to the project sites. Reducing generator noise from cannabis and firewood projects will reduce this possible impact. By removing the two well pump generators and replacing them with solar, and by placing the firewood 45K whisper watt in additional noise containment, there will be no significant impacts to Humboldt Marten, Fisher, or Sonoma Tree Vole.

American peregrine falcon

The habitat for this species is mostly in woodland, forest, and coastal habitats near wetlands, lakes, rivers, or other water on high cliffs, banks and dunes. They generally nest on protected cliffs, ledges, or rock outcrops. These projects will remove no habitat. There is no quality nesting habitat (high cliffs, banks) in the vicinity right around the project areas. Therefore, these projects will not impact American peregrine falcon.

at 3 to 4 months). The mitigations restricting generator noise for the cannabis and firewood projects (closes projects to the Van Duzen fen site) will alleviate these impacts. These projects will not contribute to cumulative impacts on wildlife species.

Mitigation:

Mitigation Measure – Biological Resources – 1: *To mitigate for potential impacts to Northern Spotted Owl protocol level surveys for disturbance (one year, six pass survey) will be done for the Carter House onsite restoration, remediation and relocation (RRR) of pre-existing scattered grow sites to Carter Flat. If breeding pairs are located within 0.25 miles of the work areas, work will be delayed until after August 15th. Alternatively, work can take place between August 15 and March 1.*

Mitigation Measure – Biological Resources – 2: *To mitigate potential impacts to special status wildlife species, the well pump generators at both the Carter Flat and Commercial Flat will be replaced with solar powered pumps. Additionally, the 45 K whisper watt generator used for the Firewood project will be placed in additional noise containment so that the sound attention will achieve a minimum reduction of 30 decibels to 18 decibels at 184 feet.*

Mitigation Measure – Biological Resources – 3: *To mitigate potential impacts to special status wildlife species, any fans installed in the proposed greenhouses at the Carter Flat, as a result of the Carter House Onsite RRR to Carter Flat project, will be required to be evaluated using auditory disturbance guidance prepared by the United States Fish and Wildlife Service and any other relevant published literature, to develop a noise attenuation plan in consultation with the Planning Department and California Department of Fish and Wildlife.*

V. CULTURAL RESOURCES

Findings:

- a) The project will not cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5: No impact.
- b) The project will not cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5: No impact.
- c) The project will not disturb any human remains, including those interred outside of formal cemeteries: No impact.

Setting:

The projects lie along a transcending ridgeline to the west of both the Van Duzen and Little Van Duzen River drainages. The area is in the ancestral home lands of the Nongatl people. Nongatl villages were located along the Van Duzen River and its creeks and drainages. All projects will take place in already disturbed areas. The only earth moving taking place is associated with the planting around the two ponds and stream crossing upgrades as part of the Carter House Onsite RRR to Carter Flat project. The holes for tree planting around the ponds will be minimal and dug with hand tools. Stream crossing upgrades will also use hand tools and may require use of excavator. Standard mitigation for inadvertent discovery will be followed for any earth moving activities.

Analysis:

- a) The project will not cause a substantial adverse change in the significance of a historical resource as defined in §15064.5.

Discussion for finding b) applies to findings a) & c).

- b) The project will not cause a substantial adverse change in the significance of an archeological resource pursuant to §15064.5. Archeological records checks and surveys have been conducted with the assessment area in association with an adjacent Timber Harvest Plans, Bureau of Land Management and

water pump generators will be replaced with solar (See Mitigation Measure – Biological Resources – 2). The Carter House Onsite RRR to Carter Flat will decrease unnecessary energy consumption due to removing the scattered grow sites that required vehicle travel to and from each site and consolidating operations to an environmentally superior area on the Carter Flat. The minor restoration work and installation of greenhouses at Carter Flat as well as replanting around the two ponds are short-term, one-time projects. The projects will not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

b) The project will not conflict with or obstruct a state or local plan for renewable energy or energy efficiency because the cannabis projects are all outdoor with minimal generator usage. The projects can be found consistent with the Energy Element of the County's 2017 General Plan due to the planned conversion from generators to solar for the well pumps as well as expanding the existing solar system at the Carter Flat. Additionally, generator use for cannabis processing activities is limited to October and November and generator use for the firewood project is limited to December through March and only utilized for approximately 20 hours per month for a total of 80 hours annually.

Cumulative Impact: The projects as proposed when considered cumulatively would not pose a significant addition to the current impact to energy resources during project construction or operations or conflict with a state or local plan for renewable energy or efficiency.

Mitigation: None.

VII. GEOLOGY AND SOILS.

Findings:

- a) The project will not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - i. i) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. Refer to Divisions of Mines and Geology Special Publication 42: No impact.
 - ii. ii) strong seismic ground shaking: No impact.
 - iii. iii) seismic-related ground failure, including liquefaction: No impact.
 - iv. iv) landslides: No impact.
- b) The project will not result in substantial soil erosion or the loss of topsoil: No impact.
- c) The project will not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse: No impact.

Setting:

The Van Duzen River, with a drainage area of 429 square miles, enters the Eel River approximately 14 miles from its mouth at the Pacific Ocean. The Van Duzen basin has an elevation of 50 feet at its mouth to over 5,000 feet in its headwaters.

The project area is located on a portion of a remnant erosional surface called the Klamath Peneplain (Diller, 1902). The Klamath Peneplain represents a relict landscape of low relief with through-going rivers from the east that existed prior to and during initial stages of uplift of the Klamath Mountains about 1 million years ago. The surface is characterized by areas of high elevation, low relief topography that is deeply incised into by the modern river drainage network.

EROSION AND LANDSLIDES

There is no evidence of landslides within the project areas. There are no historic landslides in the project areas. There are no earthquake fault lines or hazard zones in the project areas. Unfortunately, there is no landslide data for this area on the County GIS or the USGS site (figure 11). Site visits have confirmed that the

recent Alquist-Priolo Earthquake Fault zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. Refer to Divisions of Mines and Geology Special Publication 42. (Discussion for finding a) applies to both findings b) & c).

- i. Division of Mines and Geology Special Publication 42 does not show an Alquist-Priolo earthquake zone (Eaton Roughs Fault, (Jennings 1994)) within the project area.
 - ii. The firewood and cannabis projects include commercial buildings. They were built to code standards. The project will not expose people or structures to potential substantial effects associated with strong seismic ground shaking.
 - iii. The projects will not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. See historic land slide and earth quake hazard map above. There are no historic landslides or hazard zones in the project areas.
 - iv. The projects will not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. See historic land slide and earthquake hazard map above. There are no historic landslides or hazard zones in the project areas.
- b) The projects will not result in substantial soil erosion or the loss of topsoil. The Carter House Onsite RRR project to Carter Flat project will eliminate the risk of future erosion by upgrading three (3) stream crossings.
- c) The projects are not located on a geologic unit or soil type that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse. See historic land slide and earth quake hazard map above. There are no historic landslides or hazard zones in the project areas.

Cumulative Impact: As described previously, the project will not individually have geologic- or soil-related impacts. The cumulative effects of this project will not create a more unstable geologic and edaphic environment than exists at present.

Mitigation: None proposed.

VIII. GREENHOUSE GAS EMISSIONS.

- a) The project will not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment: Less than significant impact.
- b) The project will not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases: No impact.

Setting:

Greenhouse Gas (GHG) Emissions are said to result in an increase in the earth's average surface temperature commonly referred to as global warming. This rise in global temperature is associated with long-term changes in precipitation, temperature, wind patterns, and other elements of the earth's climate system, known as climate change. These changes are now broadly attributed to GHG emissions, particularly those emissions that result from the human production and use of fossil fuels.

Climate changes resulting from GHG emissions could produce an array of adverse environmental impacts including water supply shortages, severe drought, increased flooding, sea level rise, air pollution from increased formation of ground level ozone and particulate matter, ecosystem changes, increased wildfire risk, agricultural impacts, and ocean and terrestrial species impacts, among other adverse effects.

In 2006, the State passed the Global Warming Solutions Act of 2006, commonly referred to as AB 32, which set the greenhouse gas emissions reduction goal for the State of California into law. The law requires that by 2020, State emissions must be reduced to 1990 levels by reducing greenhouse gas emissions from significant sources via regulation, market mechanisms, and other actions.

Cannabis	Ship out processed product	Van	10	100
Cannabis	Employee travel to reach job site	Passenger car	244 (minimum)-1464 (maximum)	30

- b) None of the projects conflict with a plan, policy or regulation adopted for the purpose of reducing greenhouse gases.

Mitigation: None proposed.

IX. HAZARDS AND HAZARDOUS MATERIALS

Findings:

- The project will not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials: No impact.
- The project will not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment: No impact.
- The project will not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school: No impact.
- The project will not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment: No impact.
- The project will not, for a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard or excessive noise for people residing or working in the project area: No impact.
- The project will not impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan: No impact.
- The project will not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires: Less than significant impact.

Setting:

The site is not included on any list of hazardous materials sites.

All fuel, or other potentially hazardous materials for the firewood and cannabis projects will be stored on site in the established upland storage area. For the cannabis projects any hazardous materials such as fuels will be storage at the commercial flat in secondary containment. For fungal or pest problems needing treatment, plants are sprayed with OMRI listed neem oil, Green Cure (baking soda) and Armory (beneficial bacillus blend). The organic fungicide sprays are administered with backpack misters, and the correct dosages are weighed (based on application directions) on a gram scale. The dosages are put into small ziploc bags, used one at a time when mixing batches in the backpack mister. Any pre-measured bags not used that day are labelled and stored in ice chests in Building #3 (see site plan). No hazardous compounds are used in the cultivation practices.

The project areas are located in a forested landscape and are all located in Very High Fire Hazard Severity areas. The cannabis and firewood project sites are disturbed areas with little vegetation in the project foot print. Fuel reduction has been done in the forested buffers surrounding these project sites. Trees are widely spaced, and brush and lower limbs have been removed. The large lake at Commercial Flat provides a source of water for fighting fire. The lake is equipped with a pumping system that could be used to fill fire trucks. It is also large enough for a helicopter to dip water out of if necessary.

in the Traffic section). This project will not expose people or infrastructure to increased risk of death or injury from wildfire.

The cannabis projects are both existing and located on existing flats. The commercial facilities will be used to process the cannabis which includes drying, bucking down, and in some cases trimming. The commercial building meets the standards of the Fire Safe Ordinance including maintaining defensible space. The commercial site is accessed via McClellan Mountain Road which is a County Maintained Class 4 equivalent road. The driveway off the County road to Commercial Flat is approximately 500 feet long with multiple turn outs. The road grade is generally less than 5% and no sections have grades of 16% or higher. The road is approximately 16 feet wide. There is a "Hammerhead T" area on the commercial flat to provide space for emergency vehicles to turn around. Water storage on site consists of a 5000 gallon water tank. There is also the 40-million-gallon lake that can be used as an emergency source of water.

The Carter Flat is currently accessed off McClellan Mountain Road at the same location as Commercial Flat. The only buildings this road accesses are the Commercial Flat Complex and the cannabis cultivation on the Carter Flat. The driveway continues past Commercial Flat to access Carter Flat. It is approximately 3500 feet from the County road to the Carter Flat when passing through Commercial Flat. The road is generally 16 feet wide. At its narrowest section, which is the gate, it is 14 feet wide. No sections of the private road/driveway have grades of 16% or higher. There are 12 turnouts on the road between the Commercial Flat and Carter Flat, approximately one every 300 feet. A Hammerhead T will provide turn around space on the Carter Flat for emergency vehicles. Water storage at the Carter Flat consists of a 5000 gallon water tank.

These projects comply with the Humboldt County Fire Safe Ordinance. The roads on the property can be considered driveways. The longest is 3500 ft (Greater than the 1320ft per the Fire Safe Ordinance) and is 16 feet wide, with turnouts at intervals of less than 400 ft.

These projects will not expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to an urbanized area or where residences are intermixed with wildlands. The access roads and project footprints shall be maintained in a state such that they are free of vegetation during times of activity, fire safe buffers with reduced fuel loads shall be maintained around the project footprints, and all equipment shall be kept in a 'fire-safe' condition.

Cumulative Impact: These projects do not involve the handling of acutely hazardous materials, substances or waste or the emissions or disposal of hazardous substances and is not included on any list of hazardous materials sites. The hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials in the environment will not be significant. Because of its small size and isolated location, these projects will not interfere with any emergency response or evacuation plan. The access roads shall be maintained in a state such that they are free of vegetation during times of activity, fire safe buffers with reduced fuel loads shall be maintained around the project footprints, and equipment is kept in a 'fire-safe' condition. The projects as proposed shall not cause a cumulatively considerable addition to hazards & hazardous materials occurring in the surrounding area and would therefore not currently be determined to be a cumulatively considerable addition.

Mitigation: None proposed.

X. HYDROLOGY AND WATER QUALITY

Findings:

- a) The project will not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality: Less than significant impact.
- b) The project will not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin: Less than significant impact.

center. There is an overflow pipe which drains into a natural "sink" down a hillside where the water dissipates onto another near ridge flat and is absorbed back into the terrain. This overflow does get some annual use when the rainy season is heavy. The applicant is in the process of obtaining an appropriative right for the lake and in the future (3 to 5 years) pending the outcome of the appropriative right, the lake maybe used as a water source for the project. If the lake is used in the future, water will be pulled from the reservoir using an electric pump which restricts the flow down to 10 gallons per minute. At the Carter Flat, water is also supplied from the ground water well located on the same flat as the cultivation (See Plot Plan for location). This well supplies water for irrigation. Water is pumped form the well to a 5000 gallon water tank. The water tank is fitted with an automatic shut-off float valve and buoy to ensure water conservation. Plants are watered by hand. Currently the applicant estimates approximately 206,860 gallons are used yearly for irrigation for the existing cultivation at Commercial Flat and Carter Flat and estimated that 338,199 gallons would be needed annually for 51,500 sf as a result of relocating pre-existing scattered grow sites around Carter House. However, the CMMULO only allows up to one acre (43,560 sf) of cultivation per parcel so the water use estimate is likely to be less upon completion of the Carter House Onsite RRR to Carter Flat Project. The well at Carter Flat, which produces 30 gpm, will be able to supply all irrigation water needed. The nearest know groundwater basin in in Larabee Valley over a mile from the project areas (figure 12). NRM Corp does not believe the wells for these projects are connected to that basin. There are no known studies of ground water in the project area. Antidotal evidence indicates the area exhibits signs of an abundance of ground water with many high producing springs, and fens. NRM Corp does not believe the project usage will have a significant impact on ground water supply

The re-vegetation projects will not have any impact on ground water.

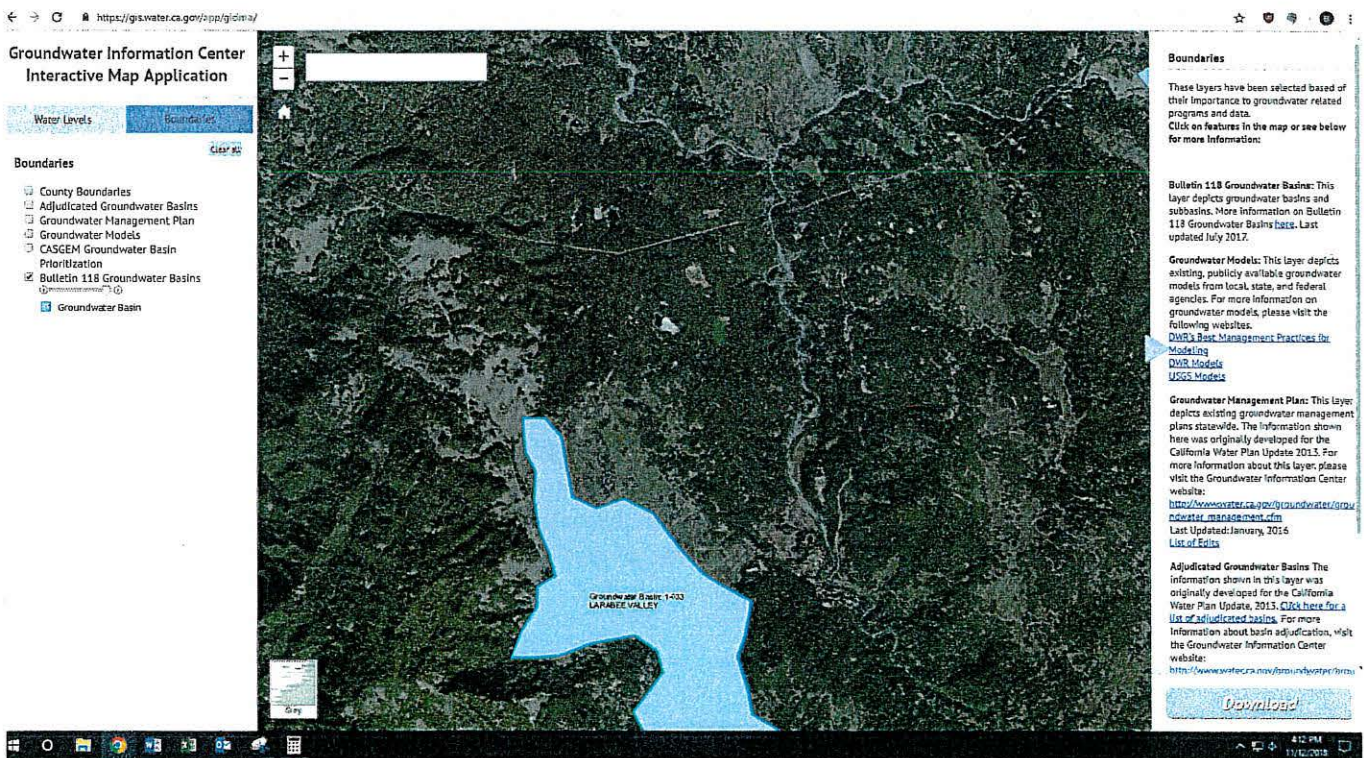


Figure 12. Ground water basins in the region where project is located. Source Groundwater Information Center.

- c) These projects will not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on or off-site. No alteration of the drainage pattern is proposed as part of these projects.

- c) The project will not conflict with any applicable habitat conservation plan or natural community conservation plan: No impact.

Setting:

The project site is comprised of five parcels of land with General Plan designations of Rural Agriculture (RA) and Timberland (T), and Timber Production Zone (TPZ) zoning and Unclassified (U) zoning.

Adjacent lands are zoned similar to the project area and utilized generally for agriculture (including both legal and illegal cannabis cultivation), rural residential, Timber Production, ranching, open space and wildlife habitat.

Analysis:

- a) These projects will not physically divide an established community. The site is located within the private land within a rural community with no established community centers. Similar operations have historically been part of the rural culture within that area. These projects will not divide a community, and it is consistent with the Humboldt County General Plan, Framework Plan, Zoning Code and Commercial Medical Marijuana Land Use Ordinance (CMMLUO).
- b) These projects will not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The cannabis projects are consistent with the CMMLUO and can co-exist and not impede restoration efforts of the McClellan Mountain Reclamation Plan required by the Wojcik's DEJ.

Cumulative Impact: These projects will not physically divide an established community since the projects consist of activities historically and currently present with the surrounding area. The projects will not conflict with any applicable land use plan, policy, or regulation of any agency with jurisdiction over the projects. The projects will not conflict with any applicable habitat conservation plan or natural community conservation plan and therefore not currently be determined to be a cumulatively considerable impact.

Mitigation: None proposed.

XII. MINERAL RESOURCES

Findings:

- a) The project will not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state: No impact.
- b) The project will not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan: No impact.

Setting:

Riverine sediment (gravel) is considered an important mineral resource and is widely mined for construction aggregate in Humboldt County. Streamside landslides are important local sources of sediment in places where rock units are highly fractured, slopes are steep, or barren soils are exposed. The Van Duzen River exhibits legacy sediment loads from past destructive large storms and poor land use practices. The variation in sediment discharge from year to year is commonly quite large and is generally dependent on the size of individual storms rather than annual water discharge. A few large storms result in more sediment being transported than normally result from many smaller storms. There is an abundance of riverine aggregate in the Van Duzen River system.

There are no Surface Mining and Reclamation Act parcels in the project areas (figure 13). The Van Duzen fen restoration project is located in the vicinity (2500 feet from the commercial flat). This fen restoration project will restore a fen that was mined for peat moss.

XIII. Noise

Findings:

- a) The project will not generate a substantial temporary or permanent increase in ambient noise levels in vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies: Less than significant impact.
- b) The project will not generate excessive groundborne vibration or groundborne noise levels: Less than significant impact.
- c) The project will not, for a project located in the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels: No impact.

Setting:

The sensitive receptors in the vicinity of the project sites include rural residences on the surrounding properties and sensitive wildlife species. Sensitive wildlife is discussed in the Biological section. There are zero(0) residences within 500 feet of the all projects except for the restoration plantings at the home pond which is the project proponents' home that is within 100 feet of the re-vegetation area. The areas surrounding the project site are mainly uninhabited forest lands. For the commercial flat where the firewood and cannabis projects are located, the project proponents home is the closets residence at 838 feet away. The next closet residence to the commercial flat is 1500 feet. The closest residence to the Carter Flat where the other cannabis project is located is 1100 feet away and this residence is also owned by the Wojcik's but rented.

Above ambient noise levels from timber harvesting activity is common to the area. The project sites are surrounded by private land. Commercial Flat is approximately 500 feet from McClellan Mt. Road and 1.4 miles from Highway 36. Carter Flat is 0.8 miles from Highway 36. Sources of noise in the project area and surrounding areas are generated by traffic on the County road and Highway 36 including noise generated by the equipment used by agricultural and timber harvest activities on the surrounding parcels. Noise sources that result from this project may include generator noise from the firewood and cannabis projects at the commercial flat and the carter flat as well as construction noise when new hoop houses are built on the carter flat. The two pond revegetation and Onsite RRR restoration and stream crossing upgrade projects will not generate any significant noise. Ambient noise levels in the project area and surrounding areas are relatively elevated due to the close proximity of Highway 36 and the County road.

Analysis:

- a) The project will not expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance or CMMLUO. Project-related sounds will be generally limited to daytime operations, generally Monday through Friday from 7:00 a.m. to 6:00 p.m.

Although the project parcels are planned for agriculture and timber production, rural residences and other uses have been built in the vicinity. In general, noise levels decrease by 6 dBA for each doubling of the distance from the source. The revegetation and restoration projects will not generate any significant noise.

The main source of noise from the cannabis and firewood projects are the generators (when in use) and the general noise from human activity. The cannabis projects are "outdoor" projects, meaning there are no lights used in flowering. The only lights will be in the nursery greenhouse on the Carter Flat which will be powered by solar. The larger 10kw whisper watt generator on the Commercial Flat is used to supply power to dry and process the cannabis. This drying and processing takes place only during the months of October and November. The generator is rated at 61 decibels at 23 feet. The Honda 3500 and 6500 are used for the well pumps at the commercial and carter flat. At the Commercial Flat the Honda 6500 runs approximately 17 hours a month between May and October (100 hours total over the 6 month growing season). At the Carter Flat the Honda 3500 runs approximately 38 hours a month between May and October (225 hours total over the 6 month growing season) The Honda EM 6500 and

Standard N-S5. Noise Standards for Habitable Rooms. Noise reduction shall be required as necessary in new development to achieve a maximum of 45 CNEL (Community Noise Equivalent Level) interior noise levels in all habitable rooms per California building standards.

Further, Standard N-S7 states that the maximum short term noise in resource zones should be a maximum of 80 dBA during the day and 70 dBA during the night.

Noise levels generated by these projects will be below the maximum allowed per Standard N-S7 and will not subject nearby residences outdoor levels in excess of 55 dBA, well within the maximum acceptable level of 60 dBA. The ongoing firewood and cannabis projects will not subject nearby residences outdoor levels in excess of 36 dB, also well within the acceptable level. The project will not expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance.

Discussion for finding a) applies to finding b).

- b) The project will not generate excessive groundborne vibration or groundborne noise levels. Increases in groundborne noise and vibrations from the project will be insignificant at the distance of the nearest residences. Noise levels generated by these projects will not subject nearby residences to outdoor levels in excess of 55 dBA, well within the maximum acceptable level of 60 dBA. The ongoing firewood and cannabis projects will not subject nearby residences outdoor levels in excess of 36 dB, also well within the acceptable level.

Discussion for finding a) applies to finding b).

- c) These projects will not, for a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels. The nearest airstrip is located in Dinsmore approximately 5 miles away. Use of the airstrip occurs rarely for emergency purposes and would occur whether these projects existed or not.

Cumulative Impact: Noise in the project area and surrounding area is generated by traffic on Highway 36, McClellan Mt Road, the Van Duzen River, and agricultural and timber harvest activities on adjacent lands. Ambient noise levels in the project area and surrounding areas are relatively elevated due to the close proximity of Highway 36 and McClellan Mt Road (County Road). Noise generated by these projects would be similar to noise levels from existing activities with the area. The Van Duzen fen restoration project which is scheduled to take place during the summer of 2019 will also contribute noise during its construction phase (estimated at 3 to 4 months). The mitigations (see biological section) restricting generator noise for the cannabis and firewood projects (closes projects to the Van Duzen fen site) will alleviate these impacts in the area. The proposed projects do not result in a cumulatively considerable addition to the existing noise levels in the surrounding area.

Mitigation: The measures outlined within the mitigation Measures – Biological Resources – 2 shall be implemented to reduce the potential impacts to a less than significant level and to ensure project activities do not adversely affect sensitive receptors.

XIV. POPULATION AND HOUSING

Findings:

- a) The project will not induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure): Less than significant impact.
- b) The project will not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere: No impact.

Setting:

The project site is located within the jurisdiction of the Department and the California Department of Forestry and Fire Protection (CALFIRE). The subject properties were identified in the Natural Resources and Hazard Reports as a Very High Fire Hazard Severity area. Cal Fire provides emergency response to fire. The nearest Cal Fire station is located in Bridgeville CA, 10 miles away. The project area is also located within the Bridgeville Volunteer Fire District which serves approximately 126,000 acres and a population of 601 residents according to the 2010 census data.

Police protection is provided by the Humboldt County Sheriff's Department.

Public school facilities are provided by Bridgeville Elementary School and Fortuna Union High School.

The project sites for cannabis and the firewood project currently receive water from wells located within the subject properties. A Portable chemical toilet is provided at the Carter Flat and is maintained by a pumping service licensed by the Humboldt County Environmental Health Dept. There are permitted septic systems at the Commercial Flat and at the house adjacent to Home Pond.

Analysis:

- i. The projects are all located in Very High Fire Hazard Severity areas. The re-vegetation projects at the Carter Flat and the two ponds will not change the fire severity rating of the area as the surrounding area is heavily forested. These are all small restoration projects, less than two acres total, and will have no impact on fire protection resources. The closest CDF station is Located in Bridgeville CA, 10 miles away. The response time from the CDF station to the project areas is approximately 20 to 30 minutes well within the 50 minute response time called for in the Humboldt County General Plan.

The firewood processing project is located within the commercial buildings on the Commercial Flat. These facilities include all of the required fire safety features. See discussion below about access and water storage at the Commercial Flat. The harvesting of firewood trees will be done under the properties existing NTMP and will follow the fire safety measures required by Cal Fire's NTMP/THP process. The harvesting of firewood trees overtime in the surrounding NTMP may even reduce the fuel loads in the surrounding timber. This project should have no significant negative impact on fire protection resources.

The cannabis projects are both existing and located on existing flats. The commercial facilities will be used to process the cannabis which includes drying, bucking down, and in some cases trimming. The commercial building meets the standards of the Fire Safe Ordinance including maintaining defensible space. The commercial site is accessed via McClellan Mountain Road which is a County maintained class 4 equivalent road. The driveway off the County road to Commercial Flat is approximately 500 ft long with multiple turn outs (figure 5). The road grade is generally less than 5% and no sections have grades of 16% or higher. The private road/driveway is approximately 16 feet wide. There is a "Hammerhead T" area on the Commercial Flat to provide space for emergency vehicles to turn around. Water storage on site consist of a 5000-gallon water tank. There is also the 40-million-gallon lake that could be used as an emergency source of water.

The Carter Flat is currently accessed off McClellan Mountain Road at the same location as the Commercial Flat (see Figure 5). The driveway, from McClellan Mountain Road, travels approximately 3500 feet from the County road to the Carter Flat. The road is generally 16 feet wide. At its narrowest section, which is the gate to the driveway from McClellan Mountain Road, it is 14 feet wide. No sections of the road have grades of 16% or higher. There are 12 turnouts on the road between the County road and Carter Flat, approximately one every 300 feet. A Hammerhead T will provide turn around space on the Carter Flat for emergency vehicles. Water storage at the Carter Flat consists of a 5000 gallon water tank.

These projects comply with the Humboldt County Fire Safe Ordinance. The roads on the property can be considered driveways. The longest is 3500 ft (Greater than the 1320ft from the Fire Safe ordinance) is 16 feet wide, with turns outs at intervals of less than 400 ft.

objectives for any of the public services for parks. Additional use of public park facilities will not be required for the project as proposed.

- v. No other government facilities are required for the project implementation. The projects will not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services for other public facilities.

Cumulative Impact: Additional use of public facilities and services will not be required for the project as proposed. Therefore, the project will not cause a cumulatively considerable addition to the use of public facilities and services in the McClellan Mountain area.

Mitigation: None Proposed. OR ADD: Add standard SR language about re: fire response?? It is located in the Bridgeville Fire Protection District.

XVI. RECREATION

Findings:

- a) The project will not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated: No impact.
- b) The project will not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment: No impact.

Setting:

The section of the Van Duzen River east of the project area is designated as a National Wild and Scenic River that provides for Recreational activities. Rafting and swimming occurs in the warm summer months and salmon and steelhead fishing occurs during the high-flow winter months although infrequent due to private access issues limiting public access to the river. The Van Duzen River is 0.6 miles from the closets project (commercial Flat cannabis site). The terrain between the project areas and the river is steep and inaccessible. The Little Van Duzen River is 0.4 miles from the carter flat cannabis project site. All projects are located on private land holdings, and no public access is granted. There are no other public recreational opportunities in the project vicinity.

Analysis:

- a) The project will not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

The project will not increase the use of surrounding recreational facilities such as the Van Duzen River area. There is no access from the project's areas to the rivers. The projects cannot be seen or heard from either river. There will be no adverse impacts to recreationists rafting or otherwise using the river.

- b) The projects do not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

The project does not include recreational facilities and will not require the construction or expansion of any recreational facilities within the area.

Cumulative Impact: The project will not increase the use of, or require the construction or expansion of recreational facilities within the surrounding area. As discussed above, the project is located south west of the Van Duzen and Little Van Duzen Rivers, and no public access exists adjacent to or from the project area. Employees will be sourced from existing population of unemployed permeant residents, it will not lead to increased use of the regions camping facilities. The project will not cause a cumulatively considerable addition to the use or construction of recreational facilities in the surrounding area.

bring in supplies and haul out product. The firewood project will haul out 50 Ford F550 flatbed truckloads of cut firewood a year. The cannabis projects reuse the same soil medium each year. There is a stock pile of fertilizer amendments (left over from a former soil business) stored in the commercial buildings on the commercial flat that will provide for most of both sites' fertilizer needs for the next 15 years. Other items that are needed will amount to 10 pickup loads per year. It is estimated that once that fertilizer supply runs out, 5 round trips of 8'x14' trailer loads of amendments and supplies will be made each year to bring in fertilizers and supplies. Additionally, processed cannabis will be hauled off site in a van. We estimate that once the site is at full production 10 van trips will be made yearly to deliver cannabis to the distributors. Minimal garbage will be created by the project, it will be mainly garbage from the employees work day and packaging from any amendments etc. We estimate that each year the project will produce two 8'x14' trailer loads of garbage which will be hauled to Eel River Recology in Fortuna CA. Table 7 below summarized vehicle trips for the firewood and cannabis projects. Employee travel to and from work sites for firewood and cannabis projects is estimated at 248 to 1488 round trips per year. Overall, it will be around 72 vehicle trips a year to bring in supplies and haul out products from both the cannabis and firewood business. According to the 2016 Traffic Volumes on California State Highways report by Cal Trans the Annual average daily traffic (which is the total traffic volume for the year divided by 365* days) is 1450 cars counted at Bridgeville. This works out to be 529,250 cars per year at this spot. Therefore, these projects would account for only 0.05 and 0.3 percent of the total traffic volume. Due to the small scale of the project, emissions from vehicles will be insignificant, especially when compared to the amount of traffic that already occurs on Hwy 36. The project represents no significant increase in traffic as a result of this project. There should be no impacts to the existing traffic load or capacity of the street system.

Table 7. Summary of yearly vehicle trips for Firewood and Cannabis Projects

Project	Task	Type of vehicle	Number of round trips per year	Estimated distance of round trip in miles
Firewood	Deliveries of firewood	Ford F550	50	100
Cannabis	Bring supplies, take out garbage	Pickup truck with 8ft by 14ft trailer	12	100
Cannabis	Ship out processed product	Van	10	100
Cannabis	Employee travel to reach job site	Passenger car	244 (minimum)-1464 (maximum)	30

- b) These projects will not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) as it is located within a rural non-urbanized area. Also see analysis in a) above.
- c) The project will not substantially increase hazards due to geometric design features (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). No roads or accessways will be altered; they will be the same as has existed for over 30 years. No new hazards or incompatible uses will be created as a result of the proposed project.
- d) These projects will not result in inadequate emergency access. For the long term projects (firewood and cannabis) the existing access to the project area from Highway 36 and McClellan Mt Road has been used historically by similar operations and no safety problems have occurred in the past. These projects

The project will not cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5.

Additionally, the cannabis project applications were referred to the Bear River Band on February 2, 2018 and an AB52 Tribal Consultation Letter was sent January 25, 2019. No response has been received to date.

ii.) The project will not cause a substantial adverse change in the significance of an archeological resource pursuant to Section 5024.1. Discussion for finding a) i. applies to findings a) ii.

Cumulative Impact: The area surrounding the project area does contain a defined tribal cultural resources. Cumulative impacts to tribal cultural resources are not cumulatively considerable since no cultural resources are known to exist or have been found on the site.

Mitigation:

Mitigation Measure – Tribal Cultural Resources – 1: 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 Section 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 Native American Heritage Commission will then be contacted by the Coroner to determine appropriate treatment of the remains pursuant to Public Resources Code Section 5097.98. Violators shall be prosecuted in accordance with Public Resources Code Section 5097.99.

XIX. UTILITIES AND SERVICE SYSTEMS

Findings:

- a) The project will not require or result in the relocation or construction of or expanded new water or wastewater treatment or storm water drainage, electric power, natural gas or telecommunications facilities, the construction of which could cause significant environmental effects: No impact.
- b) The project will not have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years: No impact.
- c) The project will not result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments: No impact.
- d) The project will not generate solid waste in excess of State and local standards, or in excess of the capacity of local infrastructure, or otherwise impair attainment of solid waste reduction goal:: Less than significant impact.
- e) The project will not violate any federal, state, and local management and reduction statutes and regulations related to solid waste: No impact.

Setting:

The project area is rural and not serviced by a waste water treatment plant. For the Carter Flat cannabis and revegetation projects, portable chemical toilets will be provided on the site and maintained by a pumping service licensed by the Humboldt County Environmental Health Dept. At the commercial flat (cannabis project, firewood project, and pond revegetation project) there is a restroom in the commercial building with a permitted septic system. This septic tank is 1500 gallons. According to the November 2017

The project will not cause a cumulatively considerable addition of impact to the use or construction of utilities and service systems to the subject or assessment area.

Mitigation: None proposed.

XX. WILDFIRE – IF LOCATED IN OR NEAR STATE RESPONSIBILITY AREAS OR LANDS CLASSIFIED AS VERY HIGH FIRE HAZARD SEVERITY ZONES

Findings:

- a) The project will not significantly impair an adopted emergency response plan or emergency evacuation plan: No Impact.
- b) The project will not, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire: Less than significant.
- c) The project will not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment: No Impact.
- d) The project will not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes: No Impact.

Setting:

The project site is located within the jurisdiction of the Department and the California Department of Forestry and Fire Protection (CALFIRE). The subject properties were identified in the Natural Resources and Hazard Reports as a Very High Fire Hazard Severity area. Cal Fire provides emergency response to fire. The nearest Cal Fire station is located in Bridgeville CA, 10 miles away. The project area is also located within the Bridgeville Volunteer Fire District which serves approximately 126,000 acres and a population of 601 residents according to the 2010 census data. Additionally, the project area is included in the Bridgeville Firewise Community. Per the Bridgeville Community Assessment, "The Bridgeville area is characterized by mixed conifer and oak woodlands with large areas of open grasslands. The topography is dominated by steep river canyons. Wildfires in [the] area would rush up the grassy hillsides with amazing speed, igniting the underbrush and lower branches of forest trees. The trees would then ignite and cause crown fires which would then spread to neighboring woodlands. The steep, narrow canyons would cause a "chimney effect" which would increase the speed and intensity of a wildfire...The community's vulnerability to damage from wildfire is high because of the presence of many risk factors. Steep slopes that are known to spread fire rapidly are present in many neighborhoods. Summer weather is consistently hot and dry and high winds blowing up and down the river valley are a common occurrence

Analysis:

- a) Currently there are no emergency evacuation plans in the project area or surrounding area. The response time from the CDF station to the project areas is approximately 20 to 30 minutes well within the 50 minute response time called for in the Humboldt County General Plan. These projects also comply with the Humboldt County Fire Safe Ordinance with adequate emergency access and turnarounds, signage, emergency water storage and fuel modification standards.
- b) The projects are located in a high instability area but slopes within the project area are relatively flat and below 15%. Prevailing winds generally from the north. The surrounding vicinity is sparsely populated. The projects will not exacerbate wildfire risks and expose project occupants to pollution concentrations from a wildfire due to slope and prevailing wind and other factors. Employees are not housed onsite and there is sufficient access to escape.
- c) No additional infrastructure is necessary for wildfire protections as the firewood and cannabis projects are existing. Fuel reduction has been done in the forested buffers surrounding the fire wood and cannabis project sites. Trees are widely spaced and brush and lower limbs have been removed. The lake at commercial flat provides a source of water for fighting fire and is equipped

nighttime hours. No supplemental lighting will be used in the proposed greenhouses at the Carter Flat as part of CUP16-271 Carter House Onsite RRR to Carter Flat project. Building plans shall incorporate the automated tarping/blackout system.

Mitigation Measure – Air Quality – 2: A Stationary Source Permit will be obtained from the Air District for the 45kw whisper watt generator. Building plans shall incorporate the automated tarping/blackout system.

Mitigation Measure – Air Quality – 3: During both the construction and operations phases of all projects the private road network will be watered as necessary to eliminate dust. Water will be sourced from the permitted ground water wells.

Mitigation Measure – Biological Resources – 1: To mitigate for potential impacts to Northern Spotted Owl protocol level surveys for disturbance (one year, six pass survey) will be done for the Carter House onsite restoration, remediation and relocation (RRR) of pre-existing scattered grow sites to Carter Flat. If breeding pairs are located within 0.25 miles of the work areas, work will be delayed until after August 15th. Alternatively, work can take place between August 15 and March 1.

Mitigation Measure – Biological Resources – 2: To mitigate potential impacts to special status wildlife species, the well pump generators at both the carter flat and commercial flat will be replaced will solar powered pumps. Additionally, the 45 K whisper watt generator used for the Firewood project will be placed in additional noise containment. The sound attention will need to achieve a minimum reduction of 30 decibels.

Mitigation Measure – Cultural Resources – 1: If buried archaeological resources are discovered during project implementation all work should be halted within 100 feet of the find and county officials, a professional archaeologist and tribal representatives should be contacted immediately to evaluate the find.

Mitigation Measure – Cultural Resources – 3: If human remains are discovered during project implementation all work shall be halted and the permitting agency, Humboldt County shall be contacted immediately. The County shall contact the County Coroner immediately and the Coroner will evaluate the find to determine the subsequent course of action.

Mitigation Measure – Tribal Cultural Resources – 1: 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 Section 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 Native American Heritage Commission will then be contacted by the Coroner to determine appropriate treatment of the remains pursuant to Public Resources Code Section 5097.98. Violators shall be prosecuted in accordance with Public Resources Code Section 5097.99.

- b) The project will not have impacts that are individually limited, but cumulatively considerable. ("cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects). Most of the items reviewed in this initial study do not apply and no impact would result. During certain times of the year the NCAB is non-attainment for the state standard for particulate matter (PM-10), mainly in the area surrounding Humboldt Bay. While the percentage of days in the year the state standard has been exceeded has been decreasing over the past few years, the standard is still exceeded on several days every year, usually in the winter months when wood stoves are predominantly used for providing heat to residences. Particulate matter generated by this project when considering its size and limited scope of operations as well as its distance from the general public

HUMBOLDT COUNTY PLANNING & BUILDING DEPARTMENT MITIGATION MONITORING REPORT

Mitigation Measures:

Aesthetics 1 – Lighting Plan

The ancillary propagation greenhouse (nursery) using supplemental light will be equipped with automated systems to pull black out tarps over the structure. The blackout tarps will be used to fully cover the greenhouse whenever lights are being used from one hour before sunset till one hour after sunrise. No light will be allowed to escape from the greenhouse during dusk, dawn, and nighttime hours. No supplemental lighting will be used in the proposed greenhouses at the Carter Flat as part of CUP16-271 Carter House Onsite RRR to Carter Flat project. Building plans shall incorporate the automated tarping/blackout system.

Implementation Time Frame	Monitoring Frequency	Date Verified	To Be Verified By	Compliance		Comments / Action Taken
				Yes	No	
Prior to issuance of the building permit, and, during project operations.	Continuous		HCP&BD			

HCP&BD = Humboldt County Planning and Building Department

Air Quality 1 – Conformance with NCUAQMD's Regulation I, Rule 104 - Prohibitions

To prevent a potentially significant contribution to the regional non-attainment for PM10, contractor shall comply with the North Coast Unified Air Quality Management District's (NCUAQMD) 'Air Quality Control Rule 104 – Prohibitions.'

Implementation Time Frame	Monitoring Frequency	Date Verified	To Be Verified By	Compliance		Comments / Action Taken
				Yes	No	
During project operations.	Continuous		HCP&BD			

HCP&BD = Humboldt County Planning and Building Department

Biological Resources 2 – Noise Attenuation for Power Sources

To mitigate potential impacts to special status wildlife species, the well pump generators at both the Carter Flat and Commercial Flat will be replaced with solar powered pumps. Additionally, the 45 K whisper watt generator used for the Firewood project will be placed in additional noise containment so that the sound attention will achieve a minimum reduction of 30 decibels to 18 decibels at 184 feet.

Implementation Time Frame	Monitoring Frequency	Date Verified	To Be Verified By	Compliance		Comments / Action Taken
				Yes	No	
Prior to initiation of operations	One-Time		HCP&BD, and CDFW			

CDFW = California Department of Fish and Wildlife, HCP&BD = Humboldt County Planning and Building Department

Biological Resources 3 – Noise Attenuation Plan for Greenhouse Fans

To mitigate potential impacts to special status wildlife species, any fans installed in the proposed greenhouses at the Carter Flat, as a result of the Carter House Onsite RRR to Carter Flat project, will be required to be evaluated using auditory disturbance guidance prepared by the United States Fish and Wildlife Service and any other relevant published literature, to develop a noise attenuation plan in consultation with the Planning Department and California Department of Fish and Wildlife.

Implementation Time Frame	Monitoring Frequency	Date Verified	To Be Verified By	Compliance		Comments / Action Taken
				Yes	No	
Prior to construction	One-Time		HCP&BD and CDFW			

CDFW = California Department of Fish and Wildlife, HCP&BD = Humboldt County Planning and Building Department

Cultural Resources 1 – Inadvertent Discoveries of Archeological Resources

If buried archaeological resources are discovered during project implementation all work should be halted within 100 feet of the find and county officials, a professional archaeologist and tribal representatives should be contacted immediately to evaluate the find.

Implementation Time Frame	Monitoring Frequency	Date Verified	To Be Verified By	Compliance		Comments / Action Taken
				Yes	No	
During construction activities and project operations	Continuous		HCP&BD			

HCP&BD = Humboldt County Planning and Building Department



Relocation Plan

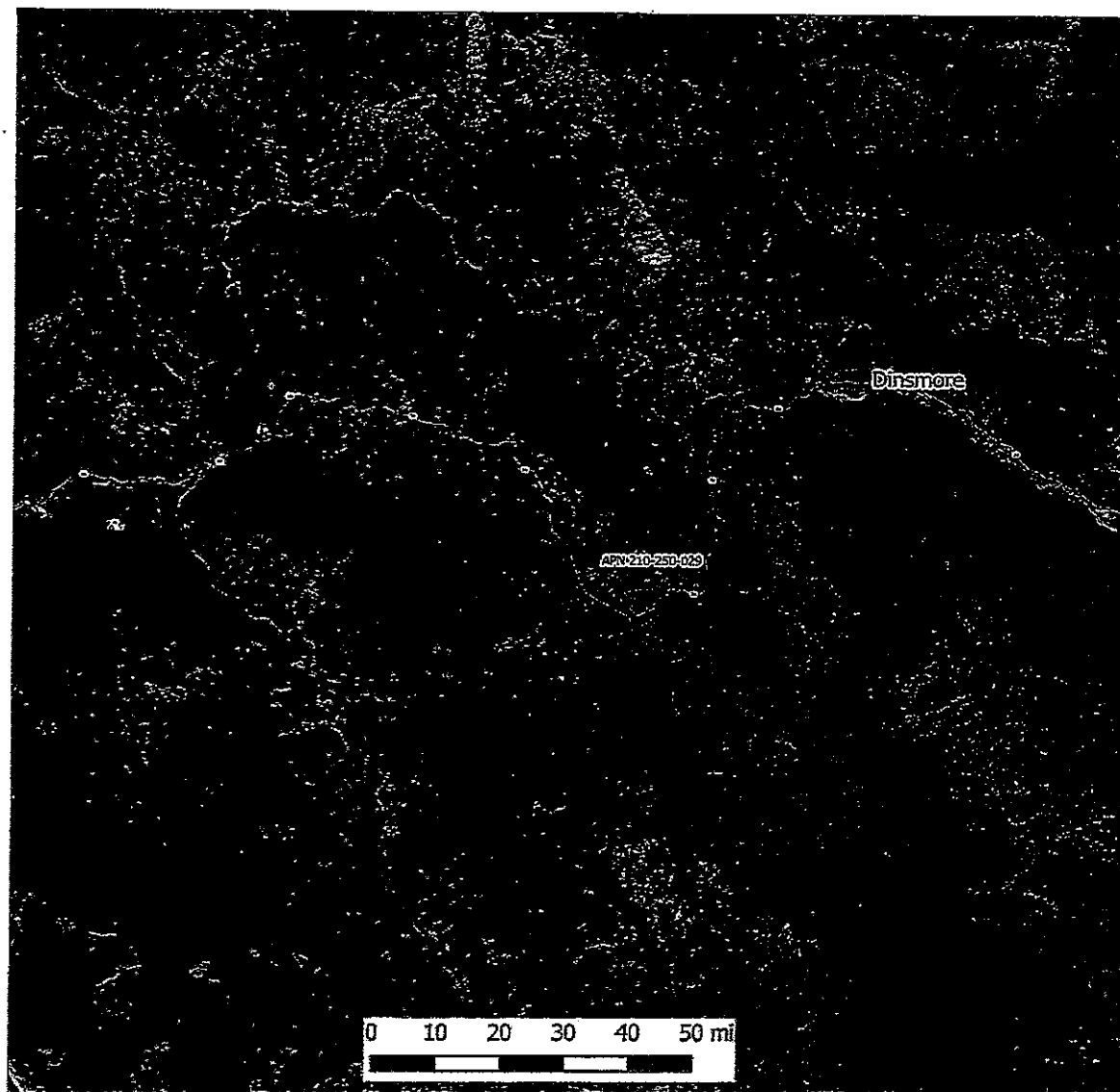
for APN 210-250-029, Humboldt County

Prepared by:
Natural Resources Management Corporation
1434 3rd Street
Eureka, CA 95501

February 8, 2019



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APN 210-250-029; T1N, R4E, SEC 7,
HB&M; USGS Larabee Valley QUAD;
HUC12: 180101050905

Produced for Daniel Wojcik by Natural
Resources Management Corporation, December 12,
2018. Google Basemap



Figure 1. Location of APN 210-250-029 within Humboldt County

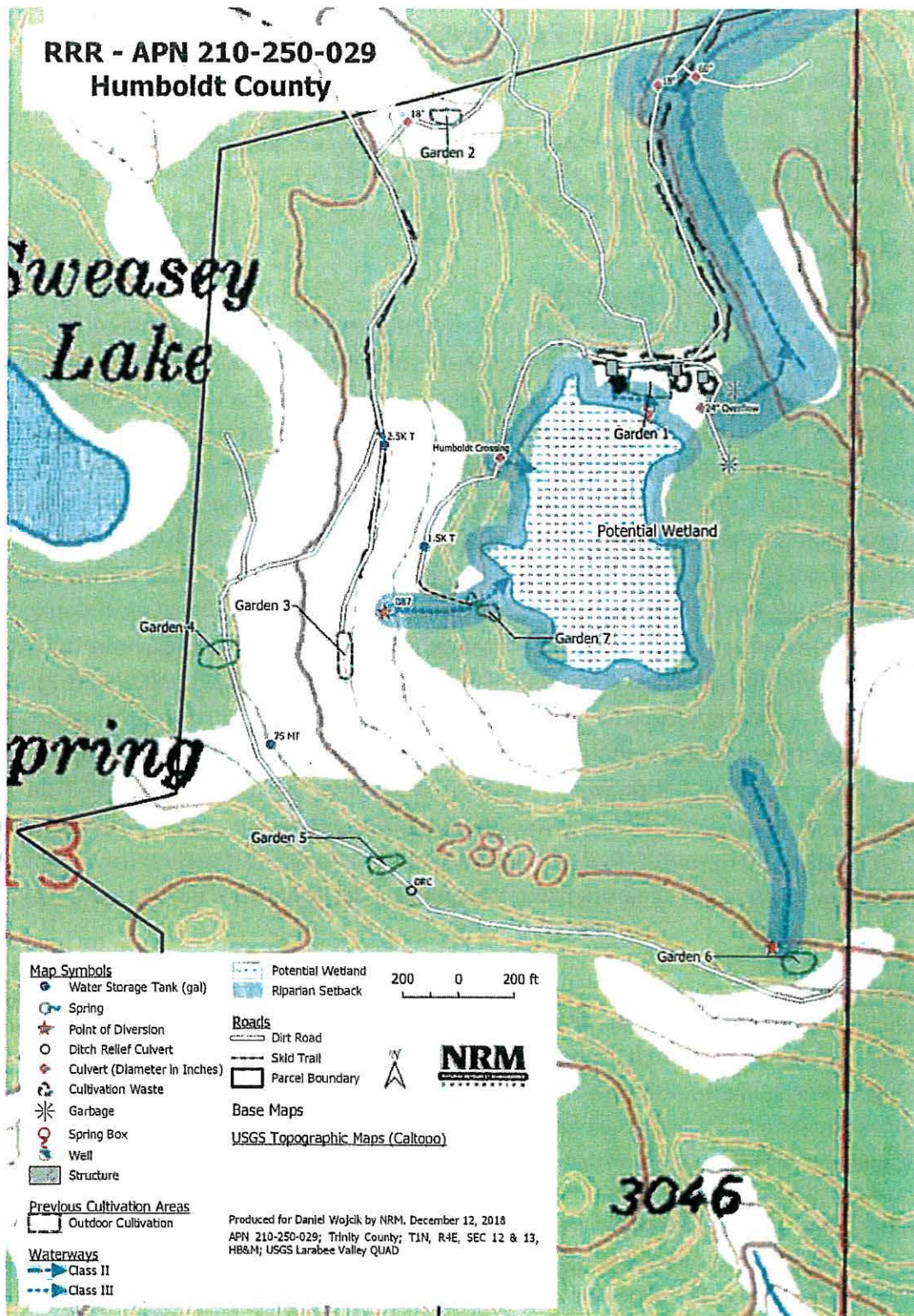


Figure 3. Infrastructure and cultivation removal for APN 210-250-029, USGS Larabee Valley Quadrangle

2.2.3 Vegetation

Vegetation on the parcel consists mostly of California mixed-evergreen forest (Holland and Keil 1995). Tree species include Douglas-fir (*Pseudotsuga menziesii* var. *menziesii*), tanoak (*Notholithocarpus densiflorus* var. *densiflorus*), California bay laurel (*Umbellularia californica*), and madrone (*Arbutus menziesii*). Black oak (*Quercus kelloggii*), and Oregon white oak (*Quercus garryana*) are present but contribute relatively low cover. In most areas, Douglas-fir contributes more than 60% of the canopy cover. This vegetation type can be described as the *Pseudotsuga menziesii* Forest Alliance (Sawyer et. al 2009). This vegetation type extends to the edge of the wetland area.

The wetland feature is currently dominated by reed canary grass (*Phalaris arundinacea*), a perennial rhizomatous grass. This species has native biotypes in California, but invasive biotypes of Eurasian origin are considered noxious weeds throughout the state and the Pacific northwest, especially in wetland environments (DiTomaso et.al 2013).

2.2.4 Roads

The parcel contains roughly two miles of dirt roads, most of which were originally used for logging. The main road network makes a loop around the wetland, staying near the ridge. All but one of the cultivation sites were built on or around the roads.

The roads are native surfaced, and are, at most, moderately sloped. The roads will be kept open and up to code.

2.3 History and Documentation of Existing Cultivation Sites

The pre-existing cultivation on the parcel totaled 33,600 square feet prior to January 1, 2016. In total, there were seven individual sites distributed throughout the parcel (Figure 2). According to the landowner, they were established around 2007 and abandoned as of 2017. Most of the remaining infrastructure, including fencing, netting, pots, etc., was removed during the same year. See Photos 1-18.

2.4 Cannabis Cultivation and Related Infrastructure

2.4.1 Cultivation Overview

The seven cultivation areas roughly follow a counterclockwise circle around the wetland, following the main road, starting with Garden 1 at the north end of the wetland, just east of the house (Figure 2). The sites are in pre-existing road clearings, enhanced by clearing adjacent trees. The primary environmental impact of these sites is timber clearing, but several of the areas are within watercourse protection buffers (SWRCB 2017; NCRWQCB 2015). No substantial grading occurred at these sites, outside of that associated with the initial road construction.

Garden 5

Garden 5 is located south of Garden 4, on the same road. This site covered 4,100 square feet of cultivation on a flat associated with the road (Photo 12, 13). It is unclear whether additional grading occurred to establish the cultivation area, or if the flat was part of historic logging operations. All cultivation materials have been removed (Photo 14). The area is revegetating naturally, primarily with grasses, with Douglas-fir trees encroaching on the edges.

Garden 6

Garden 6 comprised roughly 5,000 square feet of cultivation on a moderately sloped clearing next to the same road where Gardens 2-5 are located (Photo 15). All cultivation materials have been removed from this site. The site is revegetating naturally, primarily with grasses and forbs. However, Douglas-fir tree seedlings are coming in on the edges (Photo 16).

A spring (that was likely the water source for this site) is located approximately 20 feet to the north in the forest. The cultivation area is partially within the 50-foot buffer required by the NCRWQCB Order. No irrigation pipe was connected to the spring at the time of the site visit, but some basic infrastructure remained, including corrugated metal roofing and a bucket (Photo 17). A small channel forms below the spring that likely connects to the wetland, but it was not investigated or mapped. No diversion permits were filed with the California Department of Fish and Wildlife (CDFW) for the use of this spring.

Garden 7

The landowner was apparently unaware of the existence of Garden 7 prior to NRM's site visit in July 2017 (Photo 18). The site is a small clearing and occupies roughly 2,200 square feet of a natural flat, located in the forest just off the southwest edge of the wetland. The area is accessed by either an old logging road system or a skid trail only accessible by ATV. The site appears to have been cleared pre-1998 (the earliest Google Earth satellite imagery available) (Google 1998). Cultivation waste present at the time of the site visit includes grow-bags set in a small Class III channel, irrigation tubing and other trash (Photo 19, 20).

Garden 7 is within the 50-foot buffer of the Class III stream (Figure 2).

2.4.3 Water Infrastructure and Use.

Irrigation water for the former sites was likely supplied by the two springs mentioned in 2.3.1 (Garden 6 and 7), and/or the wells on property. Both springs are the heads of Class III streams that feed into the wetland. Both diversions were illegal and were direct diversions that persisted throughout the growing season.

The point of diversion at Garden 7 consisted of a 1-inch poly line submerged into a spring/wetland area that filled a 1,550-gallon tank (Photo 22, 23). When NRM visited the site on July 26, 2017, the tank was overflowing onto the road, causing erosion. The landowner was unaware of this diversion,

Remediation Plan

4.1 Plan Goals

The goal of this Remediation Plan is to remove the threats *Cannabis* cultivation on this parcel pose to the environment and water quality. This goal will be attained through implementation of the following steps:

1. Removal of all *Cannabis*-related materials, infrastructure and wastes from the cultivation areas.
2. Allow cleared forest land to revegetate naturally while monitoring for invasive species.
3. Upgrade stream crossings to comply with the road condition standards of the Handbook for Forest, Ranch and Rural Roads (Weaver et. al 2015).
4. Remove other waste from property including domestic trash pile (Photo 31) and the appliances (Photo 32).

4.2. Success Criteria

The remediation of this site will be considered successful if the following success criteria are met by the 2nd year of monitoring (see 'Monitoring' section below).

- All cultivation-related materials have been removed from the cultivation sites disposed of at a licensed waste disposal facility.
- All other wastes (appliances etc.) have been removed and disposed of at a licensed waste disposal facility.
- All illegal water diversions have ceased, and infrastructure has been removed.
- Invasive plant species (Cal-IPC rank 'high') are not suppressing the growth of or displacing native vegetation.
- Damage from herbivores is not limiting the growth and survival of native vegetation.
- All roads and stream crossings meet the road condition standards of the *Handbook for Forest, Ranch and Rural Roads* (Weaver et. al 2015).

4.3 Schedule

- Both illegal water diversions had ceased as of 2017, and all cultivation materials have been removed from Gardens 1-6. Photo evidence and receipts for waste removal and disposal from Garden 7 shall be submitted by early 2019. This evidence will be submitted to Humboldt County in the annual monitoring reports (Section 5.3).

potential are found to be present, a management plan for removal will be developed and implemented. Adaptive management must be utilized to determine an appropriate course of action. Invasive plant species of concern include but are not limited to: Himalayan blackberry (*Rubus armeniacus*), scotch broom (*Cytisus scoparius*) and French broom (*Genista monspessulana*). The California Invasive Plant Council Inventory should be consulted when considering the invasive characteristics of any such species (Cal IPC 2018).

Garden 1 will also be monitored for the presence and spread of invasive species, but this area is expected to remain dominated by the same vegetation type present in the wetland and surrounding open area (*Phalaris arundinacea* and other grass species).

5.1.2. Revegetation Site Maintenance

If invasive species are found to be spreading rapidly or suppressing native tree and shrub recruitment during revegetation site monitoring, a management plan must be developed and implemented. Adaptive management must be utilized, as an effective management plan will depend on the problem species and the degree of infestation. For example, the use of herbicides to remove Himalayan blackberry is not recommended due to ineffectiveness and the stimulation of adventitious shoots (Bossard, Randall and Hoshovsky, 2000). The best management practice for the removal or reduction of Himalayan blackberry is to manually clear the canes either by hand or with mowing/brushing equipment (Bossard, Randall and Hoshovsky, 2000). Subsequent removal of re-sprouting canes will slowly starve the root crowns. Ongoing maintenance of these cane sprouts will be crucial for the successful establishment of naturally recruiting or re-sprouting native trees and shrubs. Scotch broom can be effectively removed by pulling the whole plant by the roots. The use of a weed-wrench aids in the removal of larger, more established individuals. Scotch broom creates an abundant and long-lived seed bank and new seedlings must usually be pulled every year for five to ten years before it is depleted (Bossard, Randall and Hoshovsky, 2000). A botanist or restoration ecologist qualified to research effective methodologies and apply them to the problem site shall be responsible for such maintenance if needed.

4.5 Road Treatment Plan

A condition of the RRR program is that road conditions on the property should be brought up to meet the road condition standards outlined in the *Handbook for Forest, Ranch and Rural Roads* (Weaver et. al 2015), and not pose significant threats to water quality. Three stream crossings will be upgraded to meet these standards. Besides the crossings, the roads on this parcel are in good condition and do not need further work.

4.6.1 Stream Crossings

Three stream crossings on the parcel will be upgraded to come into compliance. A CDFW Lake and Streambed Alteration Agreement (LSAA) will be applied for to perform instream work as per California Fish and Game Code (CDFW 2017). See Figure 3 for LSAA project locations.

LSAA Project 1: Wetland Outlet Culvert Upgrade

- Photo points (see below);
- Assessment of maintenance needs (invasive species removal etc).

Adaptive management must be utilized to determine whether additional monitoring or maintenance is needed during the year. Records of these monitoring visits and maintenance needs will be kept for the annual monitoring reports (see Section 5.3).

5.1.2 Photo Points

Photo points that provide an overview of the seven revegetation sites (corresponding with Gardens 1-7) will be established at the beginning of the monitoring period, or 1 year before the first annual monitoring site visit. These points will be recorded with GPS, the location described, and represented on a map. Additionally, the cardinal direction of azimuth of photo direction will be described. Photos will be taken annually from these points during the yearly monitoring and included in the annual monitoring and final reports.

5.2 Stream Crossing Upgrade Monitoring

5.2.1 Methods

Following the completion of all stream crossing work, qualified individual will visit the site to assess and verify that all treatments were completed according to required specifications. Photo evidence and a written statement documenting work completion will be included in the annual monitoring report for that year (see below).

5.3 Monitoring Reports

Following each annual monitoring event, a report will be submitted to Humboldt County by December 15 of the same year. Each report will include:

- A description of remediation work done that year, including photo evidence and any receipts;
- A general description of site conditions;
- Descriptions of monitoring methodology and results;
- Descriptions of any corrective actions needed, or proposed method changes.
- Summary of progress towards meeting the success criteria.

If the Success Criteria outlined in section 4.2 are met by monitoring year two, a final report detailing the completion of remediation efforts will be submitted to Humboldt County by December 15th of that year. If the Success Criteria are not met by monitoring year two, a report detailing what work is still needed and a timeline for completion will be submitted to Humboldt County. The monitoring period will then be extended as needed, subject to input from Humboldt County.

6.0 References

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- California Department of Fish and Wildlife (CDFW). 2017. California FISH AND GAME CODE – FGC DIVISION 2. DEPARTMENT OF FISH AND WILDLIFE [700 - 1940]. CHAPTER 6. Fish and Wildlife Protection and Conservation [1600 - 1617] (Amended by Stats. 2017, Ch. 27, Sec. 108. (SB 94) Effective June 27, 2017).
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- California State Water Resources Control Board (SWRCB). 2017. General Waste Discharge Requirements and Waiver of Waste Discharge Requirements for Dischargers of Waste Associated with Cannabis Cultivation Activities. California Water Boards. Sacramento, CA.
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- Google Earth Pro V 7.3.2.5491 (Google). August 12, 1998. California, U.S.A. 40° 28' 00.68" N, 123° 40' 06.73" W, Eye alt 7528 feet. U.S. Geological Survey, 1998. [December 10, 2018].

Appendix A: Site Photos



Photo 1. Garden 1, looking west. Carter House on right. July 26, 2017



Photo 2. Garden 1, looking south. Wetland in background. July 26, 2017



Photo 5. Garden 2, looking upslope northeast. July 26, 2017



Photo 6. Garden 2 after removal of all infrastructure. November 2017



Photo 9. Garden 3 with infrastructure removed. November 2017



Photo 10. Garden 4, looking southwest from road. November 2017

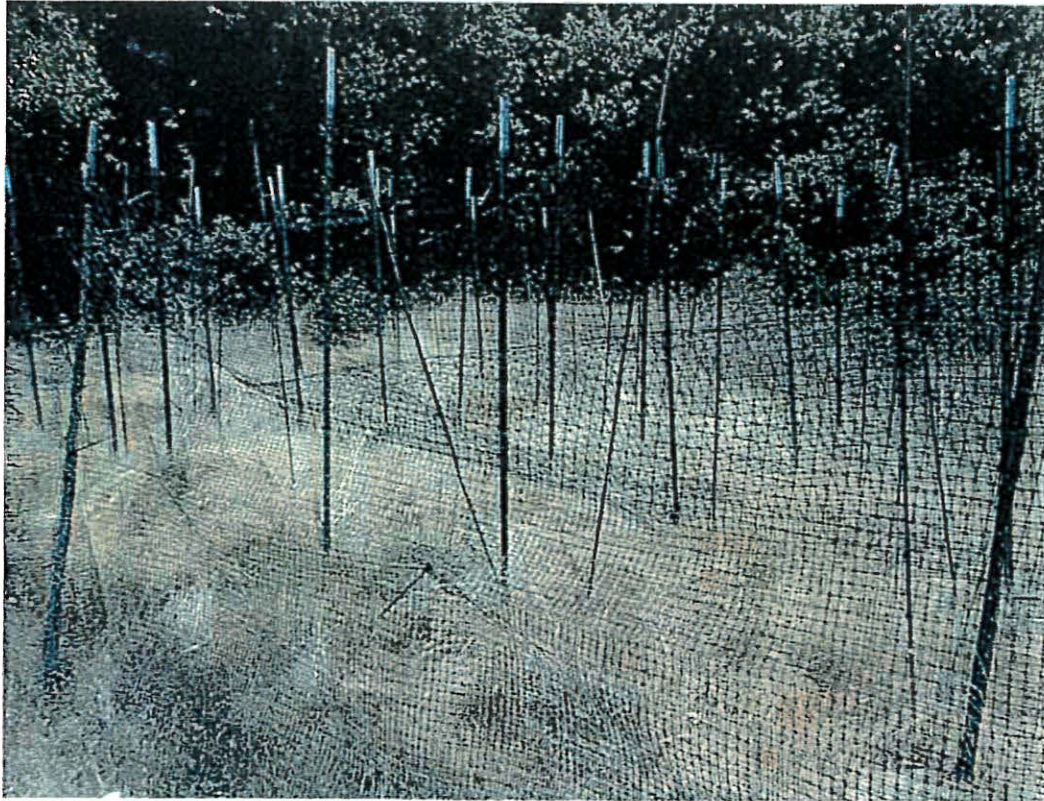


Photo 13. Garden 5, fencing. July 26, 2017



Photo 14. Garden 5, infrastructure removed. November 2017



Photo 17. Spring at Garden 6. July 26, 2017

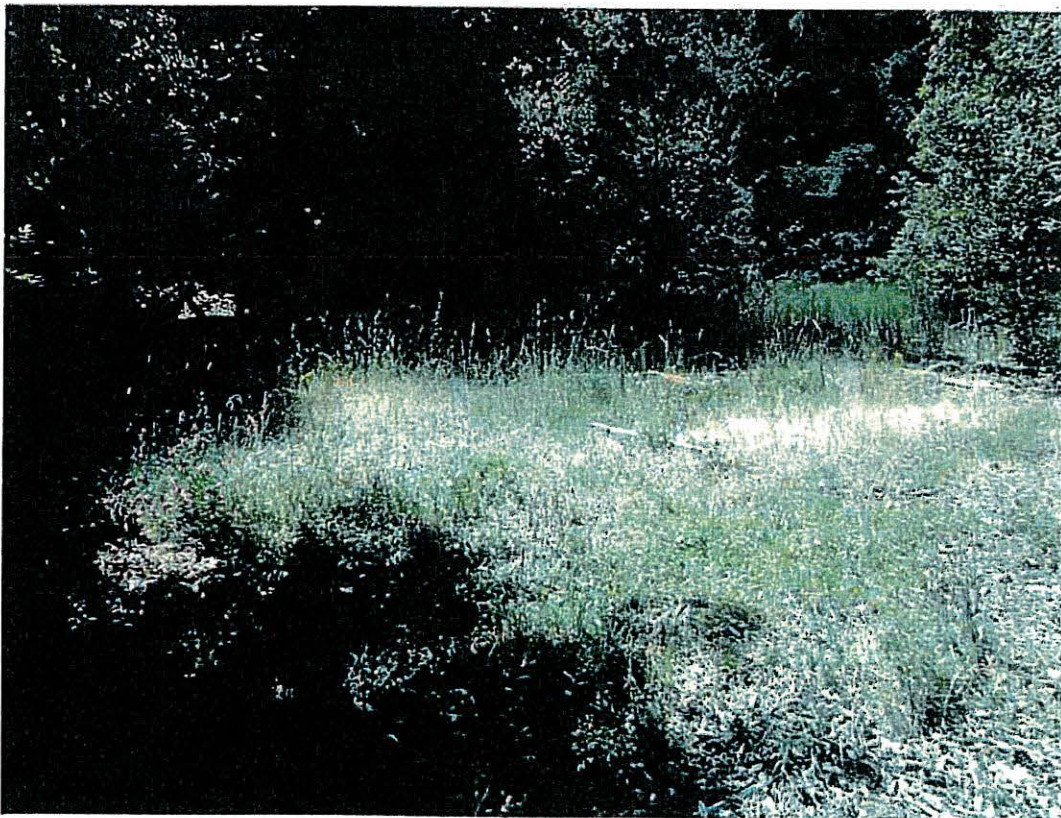


Photo 18. Garden 7 clearing. July 26, 2017



Photo 21. Wetland/spring former point of diversion that was filling up tank. Diversion has been removed. July 26, 2017



Photo 22. Tank filling up from wetland/spring (Photo 21), overflowing onto road. July 26, 2017



Photo 25. LSAA Project 1 looking upstream at outlet. July 26, 2017



Photo 26. LSAA Project 1 looking downstream from outboard edge of road. July 26, 2017



Photo 29. LSAA Project 2, looking upstream at outlet. Note undercutting. July 26, 2017



Photo 30. LSAA Project 3, looking upstream at Humboldt crossing outlet. July 26, 2017

Project Cost Estimate

December 19, 2018

Created for

Dan Wojcik

APN 210-250-029



Project

RRR Humboldt County

Description	Qty	Unit price	Total price
1600 permit application fee	1	\$4,900.00	\$4,900.00
1600 permit application labor**	10	\$75.00	\$750.00
CMP materials	3	\$500.00	\$1,500.00
Labor Hours-Maintenance Yrs 1-2*	40	\$28.54	\$1,141.60
Labor hours- Monitoring site visit Yrs 1-2**	30	\$75.00	\$2,250.00
Labor Hours - Annual Report Years 1-2**	40	\$75.00	\$3,000.00
Labor Hours-Equipment operator*	30	\$64.12	\$1,923.60
Labor Hours-Equipment hauling *	5	\$100.00	\$500.00
Labor Hours-Trash Cleanup*	48	\$29.54	\$1,417.92
Labor Hours-Trash Hauling*	8	\$22.93	\$183.44
Trash Disposal	3,000	\$0.08	\$240.00

Notes: * 2018 CA Prevailing wage. All other labor costs are approximations of industry rates.

Subtotal **\$17,806.56**

** Prices approximations of industry rates

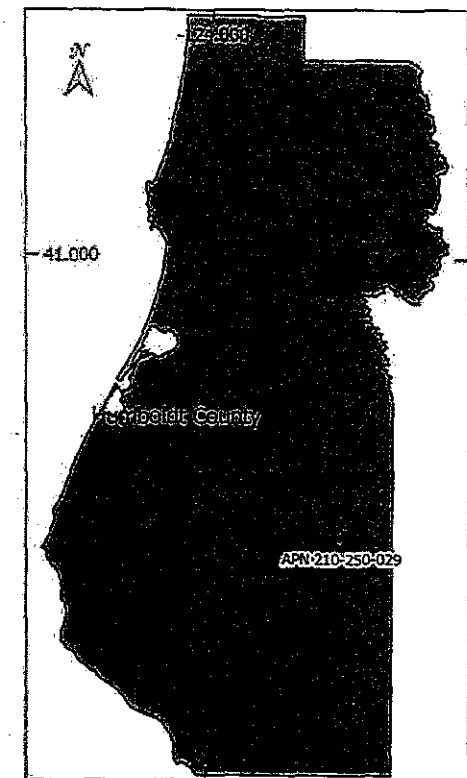
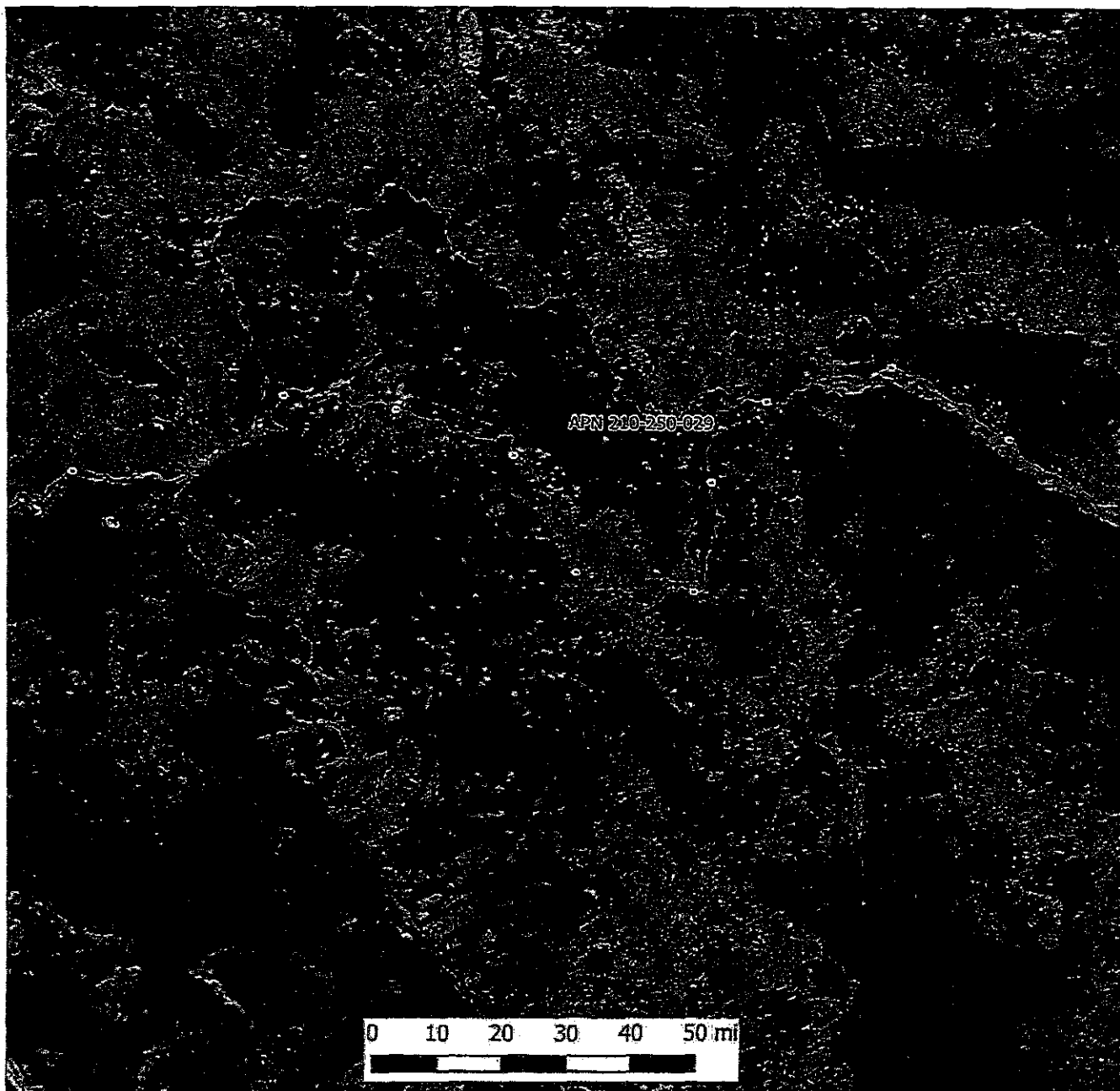
\$17,806.56

**Remediation and Monitoring Plan
for the
Retirement Remediation and Relocation (RRR)
of APN 210-250-029, Humboldt County**

Prepared by:
Natural Resources Management Corporation
1434 3rd Street
Eureka, CA 95501

December 18, 2018





APN 210-250-029; T1N, R4E, SEC 7,
HB&M; USGS Larabee Valley QUAD;
HUC12: 180101050905

Produced for Daniel Wojcik by Natural
Resources Management, February, 2019.
Google Basemap



Figure 1. Location of APN 210-250-029 within Humboldt County

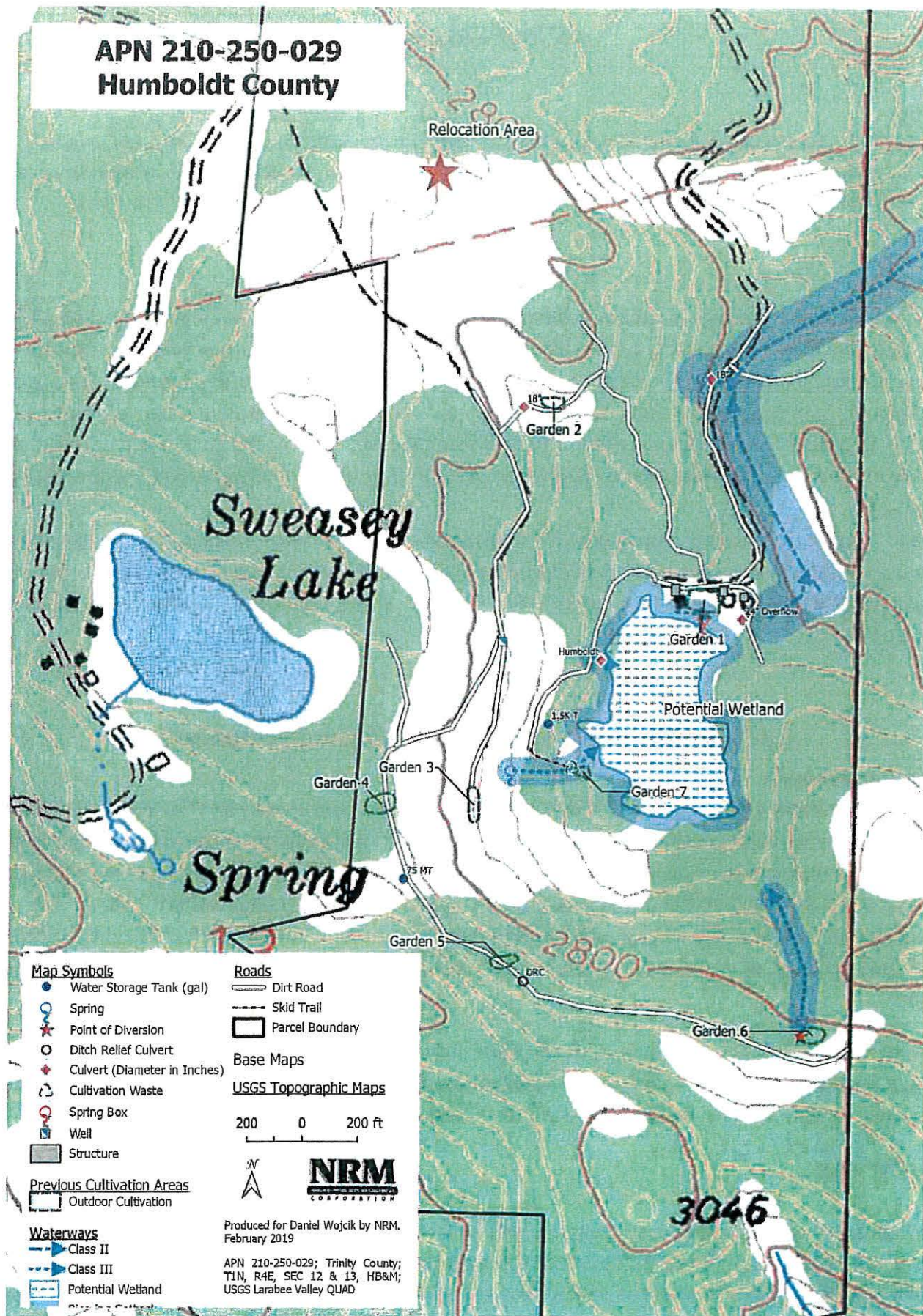


Figure 3. Infrastructure and cultivation removal for APN 210-250-029, USGS Larabee Valley Quadrangle

past aerial/satellite imagery, the area was grassland before cultivation occurred. It is currently growing back with grasses, including reed canary grass. See Figure 2

Although the wetland has not been delineated, this garden was located 12 feet from the closest standing water in the wetland. The North Coast Regional Water Quality Control Board (NCRWQCB) defines watercourse buffers as 50 ft from a perennial wetland or Class III stream, and 100 ft from a Class II stream.

Garden 2

Garden 2 is located northwest of Garden 1, on a moderate slope above an old haul road (Photos 4, 5). Garden 2 included roughly 3,300 square feet. To establish better sun exposure, some trees were cleared downslope of the road when the site was developed. As of 2017, all cultivation infrastructure (fencing, netting, stems) had been removed (Photo 6). The area is revegetating naturally with grasses, Douglas-fir, and madrone.

Garden 3

Garden 3 is at the end of an old logging road west of the wetland. It includes a former 5,000 square feet of cultivation, located on a former road bed and adjacent downslope area (Photos 7, 8). All cultivation materials were removed by 2017 (Photo 9). Douglas-fir and other trees are starting to grow back here (Photo 9).

Garden 4

Garden 4 comprised roughly 7,000 square feet of cultivation, situated on what appears to be an old log landing spanning both sides of the road. No additional grading appears to have occurred. All cultivation materials were removed by 2017 (Photo 9, 10).

Garden 5

Garden 5 is located south of Garden 4, on the same road. This site covered 4,100 square feet of cultivation on a flat associated with the road (Photo 12, 13). It is unclear whether additional grading occurred to establish the cultivation area, or if the flat was part of historic logging operations. All cultivation materials have been removed (Photo 14). The area is revegetating naturally, primarily with grasses, with Douglas-fir trees encroaching on the edges.

Garden 6

Garden 6 comprised roughly 5,000 square feet of cultivation on a moderately sloped clearing next to the same road where Gardens 2-5 are located (Photo 15). All cultivation materials have been removed from this site. The site is revegetating naturally, primarily with grasses and forbs. However, Douglas-fir tree seedlings are coming in on the edges (Photo 16).

A spring (that was likely the water source for this site) is located approximately 20 feet to the north in the forest. The cultivation area is partially within the 50-foot buffer required by the NCRWQCB Order. No irrigation pipe was connected to the spring at the time of the site visit, but some basic infrastructure remained, including corrugated metal roofing and a bucket (Photo 17). A small channel forms below the spring that likely connects to the wetland, but it was not investigated or mapped. No diversion permits were filed with the California Department of Fish and Wildlife (CDFW) for the use of this spring.

Garden 7

The landowner was apparently unaware of the existence of Garden 7 prior to NRM's site visit in July 2017 (Photo 18). The site is a small clearing and occupies roughly 2,200 square feet of a natural flat, located in the forest just off the southwest edge of the wetland. The area is accessed by either an old logging road system or a skid trail only accessible by ATV. The site appears to have been cleared pre-1998 (the earliest Google Earth satellite

Appendix A: Site Photos



Photo 1. Garden 1, looking west. Carter House on right. July 26, 2017



Photo 2. Garden 1, looking south. Wetland in background. July 26, 2017



Photo 5. Garden 2, looking upslope northeast. July 26, 2017



Photo 6. Garden 2 after removal of all infrastructure. November 2017



Photo 9. Garden 3 with infrastructure removed. November 2017



Photo 10. Garden 4, looking southwest from road. November 2017

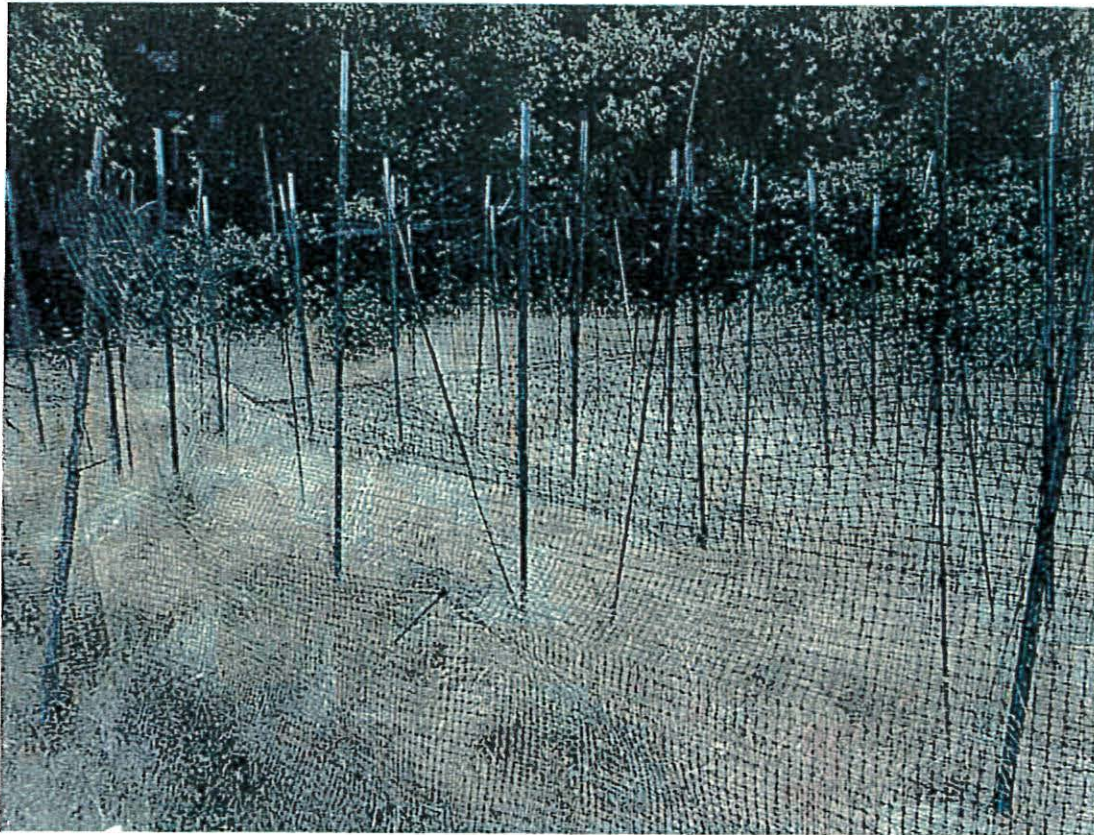


Photo 13. Garden 5, fencing. July 26, 2017



Photo 14. Garden 5, infrastructure removed. November 2017



Photo 17. Spring at Garden 6. July 26, 2017



Photo 18. Garden 7 clearing. July 26, 2017



Photo 21. Wetland/spring former point of diversion that was filling up tank. Diversion has been removed. July 26, 2017



Photo 22. Tank filling up from wetland/spring (Photo 21), overflowing onto road. July 26, 2017

*The free Adobe Reader may be used to view and complete this form. However, software must be purchased to complete, save, and reuse a saved form.

Permit Number 09/10-0544

No. XXXXXX

Date Work Ended 4/12/2010

Permit Date

DWR Use Only -- Do Not Fill In			
State Well Number/Site Number			
Latitude		Longitude	
APN/TRS/Other			

Geologic Log				Well Owner							
Orientation: <input checked="" type="radio"/> Vertical <input type="radio"/> Horizontal <input type="radio"/> Angle Specify _____ Drilling Method: <u>Rotary</u> Drilling Fluid: <u>Air</u>				Name: <u>Dan Wolcik</u> Mailing Address: <u>1920 McGlellan Rd.</u> City: <u>Bridgeway</u> State: <u>Calif</u> Zip: <u>95526</u>							
Well Location											
Address: _____ City: _____ County: _____ Latitude: _____ N Longitude: _____ W Datum: _____ Dec. Lat: _____ Dec. Long: _____ APN Book: <u>201</u> Page: <u>250</u> Parcel: <u>028</u> Township: _____ Range: _____ Section: _____											
Location Sketch				Activity							
(Sketch must be drawn by hand after form is printed.)				<input checked="" type="radio"/> New Well <input type="radio"/> Modification/Repair <input type="radio"/> Deepen <input type="radio"/> Other <input type="radio"/> Destroy <small>Describe procedures and materials used in "GEOLOGIC LOG"</small>							
North				Planned Uses							
<div style="display: flex; justify-content: space-between;"> West East </div>				<input checked="" type="radio"/> Water Supply <input checked="" type="checkbox"/> Domestic <input type="checkbox"/> Public <input type="checkbox"/> Irrigation <input type="checkbox"/> Industrial <input type="radio"/> Cathodic Protection <input type="radio"/> Dewatering <input type="radio"/> Heat Exchange <input type="radio"/> Injection <input type="radio"/> Monitoring <input type="radio"/> Remediation <input type="radio"/> Sparging <input type="radio"/> Test Well <input type="radio"/> Vapor Extraction <input type="radio"/> Other							
				South							
<small>Indicate at various distances of well from roads, structures, borders, etc. and attach a map. Use a different color for materials. Please be accurate and complete.</small>											
Water Level and Yield of Completed Well											
Depth to first water: <u>140</u> (Feet below surface) Depth to Static: _____ Water Level: <u>140</u> Feet Date Measured: <u>04/11/2010</u> Estimated Yield: <u>30</u> GPM Test Type: <u>Air Lift</u> Test Length: <u>40</u> Hours Total Drawdown: _____ (Feet) *May not be representative of a well's long term yield.											
Casings				Annular Material							
Depth from Surface Feet to Feet	Borehole Diameter (Inches)	Type	Material	Wall Thickness (Inches)	Outside Diameter (Inches)	Screen Type	Slot Size If Any (Inches)	Depth from Surface Feet to Feet	FMI	Description	
0	175	9	Blank	PVC Sch. 40	1/4	5.5		0	20	Bentonite	3/8 Hole Plug
175	180	9	Screen	PVC Sch. 40	1/4	5.5	0.032	20	180	Filter Pack	3/8 pea Gravel
Attachments				Certification Statement							
<input type="checkbox"/> Geologic Log <input type="checkbox"/> Well Construction Diagram <input type="checkbox"/> Geophysical Log(s) <input type="checkbox"/> Soil/Water Chemical Analyses <input type="checkbox"/> Other				I, the undersigned, certify that this report is complete and accurate to the best of my knowledge and belief. Name: <u>Rich Well Drilling & Pump Service, Inc.</u> Person, Firm or Corporation: _____ Address: <u>1261 Railroad Dr</u> City: <u>McKinleyville</u> State: <u>CA</u> Zip: <u>95519</u> Signed: <u>[Signature]</u> Date Signed: <u>02/02/2012</u> C-57 Licensed Water Well Contractor							

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IF ADDITIONAL SPACE IS NEEDED, USE NEXT CONSECUTIVELY NUMBERED FORM

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