

Attachment 1C

Additional Project Information and Updated Water Usage Estimates

Additional Project Information March 1, 2023

Megan Marruffo

From: Jack Skeahan <JackS@pacificwatershed.com>
Sent: Tuesday, March 1, 2022 4:02 PM
To: Megan Marruffo
Cc: Eugene Denson; karen silva; Jack Skeahan
Subject: RE: APPS #10822 (Bridgeville Organic Pharms, LLC) - Project Questions

Hello Megan,

Please see the responses below in blue font and let Ms. Silva, Ms. Jordan, or I know if you have any questions or need any additional information regarding this permit application.

Thank you.

1. Please confirm if the below project description is accurate and revise as needed.

Project Description: A Conditional Use Permit for an existing 40,025 square foot (SF) cannabis cultivation (14,000 SF of mixed light and 26,025 SF of outdoor) [the proposed total cultivation area for the permit application is correct at 40, 025 ft2 however the total light deprivation/outdoor \(previously referred to as mixed light\) square footage should be 17,150 ft2 and outdoor square footage should be 22,875 ft2. The total maximum areas for the permit application provided here are not the existing cultivation areas that were used during the 2021 cultivation season or the areas that will be cultivated in the upcoming 2022 season. The 2021 and 2022 cultivation areas that should be considered for county cultivation area tax purposes are as follows: light deprivation/outdoor \(previously referred to as mixed light\) = 16,872 ft2 and outdoor = 5,270 ft2., including 1,920 SF of ancillary propagation this is correct.](#) Irrigation water is sourced from a permitted groundwater well on the subject parcel, with a Class II diversion proposed [correct.](#) Existing available water storage is 105,050 gallons [the updated storage volume is now 115,100 gallons after additional water tanks were installed](#) in a series of hard-sided tanks. Estimated annual water usage is 74,260 gallons [the updated annual water usage should be changed to 94,487 gallons as per 2021 water use tracking.](#) Processing occurs onsite within two (2) existing drying sheds [this is correct, and the Department of Cannabis Control \(DCC\) floor plan was provided in a previous email if dimensions or square footage per cultivation type are needed \(these values are also provided below\).](#) A maximum of eight (8) people may be onsite during peak operations [this is correct.](#) Power is provided by three (3) generators [this is correct but please refer to the long-term plan question below.](#) A Special Permit is also requested for installation, use, and maintenance of point of diversion infrastructure within the Class II watercourse [a Special Permit will be applied for and approved prior to installation of the point of diversion \(POD\) infrastructure if required, although this permit application and the potential requirements, analysis, and tasks such as a biological assessment and wetland delineation, seem excessive for a small impact area related to a singular POD. I am waiting for clarification from the Humboldt County Building Department regarding whether there is a minimum disturbance area or level of impact where a Special Permit would not be required. In addition to having minimal impacts, the proposed POD is covered under an existing final notification agreement with CDFW that includes mitigation measures to address any impacts resulting from installation and use of the POD.](#)

2. Has the proposed point of diversion on the Class II watercourse been installed onsite? the POD has not yet been installed but is proposed to be installed prior to the end of the 2022 dry season provided a Special Permit (SMA) is approved if needed. The POD may not be installed if the Special Permit requirements and overall cost are too excessive and/or exceed the estimated benefit from having the POD in place. For now, well production during the wet season and the available tank storage are more than adequate for the seasonal irrigation needs. Will it be utilized for irrigation, and if so, how much water do you expect to come from the well vs. from the point of diversion for irrigation use? if the POD is installed, water diverted from the POD will be used for irrigation and the

total amount diverted would be up to a maximum of approximately 101,000 gallons (0.31 ac-ft). This is the maximum amount allowed under the issued Small Irrigation Use Registration (SIUR) Water Right Certificate. The remaining rigid water tank storage volume (approximately 14,100 gallons) will be filled outside of the forbearance period from the groundwater well depending upon the county's final determination regarding non-hydrologically connected groundwater well use during the forbearance period. Any additional irrigation water needed during the forbearance period may or may not be sourced from the groundwater well based on the county's determination on this subject.

3. Do you have long-term plans to switch to an alternative power source (such as PG&E or solar)? the long-term plan for an alternative power source is to install a solar system as connection to PG&E is likely cost prohibitive for such a rural location.
4. What are the size and dimensions of the two sheds utilized for drying and processing? please refer to the previously submitted DCC floor plans for the two sheds for dimensions but the information is also provided here: The northern shed is 12 feet wide by 49 feet long (588 ft²) and the southern shed is 20 feet wide by 31 feet long (620 ft²).
5. Do you have an agent you'd like me to coordinate with? Ms. Silva has already provided my contact information, but it is also included here: Jack Skeahan, Pacific Watershed Associates, email: jacks@pacificwatershed.com, office phone: (707) 839-5130 ext. 37, cell phone: (707) 616-1511.

Additional information/updates provided below:

- In the Cultivation and Operations Plan (COP) description of activities and the overall project description each instance where the term "Mixed Light" is used should now be considered "Light Deprivation/Outdoor" for this permit application and annual excise tax consideration. The revised COP reflecting these changes is under development and will be sent to you as soon as it is finalized.

Jack Skeahan, Project Geologist
Pacific Watershed Associates
PO Box 4433, Arcata, CA 95518-4433
707-839-5130
jacks@pacificwatershed.com

From: Megan Marruffo <marruffom@lacoassociates.com>
Sent: Tuesday, February 15, 2022 1:05 PM
To: Jack Skeahan <JackS@pacificwatershed.com>
Cc: Eugene Denson <edenson95511@gmail.com>; karen silva <karisilva1953@gmail.com>
Subject: RE: APPS #10822 (Bridgeville Organic Pharms, LLC) - Project Questions

Hi Jack,

Thank you for the quick reply and for the documents. We'll review and be sure these get included. I'll be on the lookout for the other e-mail.

Sincerely,
Megan

Additional Project Information December 19, 2022

Megan Marruffo

From: Eugene Denson <edenson95511@gmail.com>
Sent: Monday, December 19, 2022 5:36 PM
To: Megan Marruffo; Ford John
Cc: Eugene Denson; Jack Skeahan; karen silva; Bushnell, Michelle; HCGA; Kess Jordan
Subject: APPS #10822 Completed Needed Information With Attachments
Attachments: Silva, Karen Redacted Current Road Agreement 23Jul22.pdf; Silva, Karen Access roads with land ownership loc map for LACO to Use for Noticing by PWA 19Dec22.pdf; Silva, Karen Scope 51121_BOP_DCC Grant Proposal_Rainwater_vfinal_8-31-2022 (1).pdf

Hello,

I have attached the renewed road agreement for the above referenced application. The applicant is also going to forgo using the well and will install rain catchment, so their application can move forward for approval. I have attached the scope of work used to apply for the DCC grant funding for water conservation. However, until the county releases/approves the grant funds, the applicant will be limited to only adding the catchment infrastructure to fill the water tanks on site. Additional tanks mentioned in the scope of work will be obtained with grant funds at a later date. Below please find your email with the information needed to complete this project. Answers are in blue from Jack Skeahan (PWA) and myself. Hopefully with this email the hold on this project can be removed and can now go to the planning commission for approval.

[LACO email from 11/15/22](#)

Hello Kessie,

We are close to finishing up the staff report for the Bridgeville Organic Farms, LLC project (APPS #10822) through the County of Humboldt. However, we have a few remaining clarifying questions we are hoping you can help address:

1. It is our understanding that a groundwater well is currently utilized for the project, but that a point of diversion (POD) is proposed. ["Use of the well for cannabis irrigation will be replaced by rainwater catchment for the foreseeable future with the permitted point of diversion as a potential backup water source, however the applicant would like to reserve the option to use the well in the event the statewide emergency drought restriction is rescinded or modified, or if the current county position on groundwater well use for cannabis irrigation changes. Rainwater catchment, or use of the permitted but not yet installed point of diversion for surface water \(provided the forbearance period is observed\), will be the sole source\(s\) of water for cannabis irrigation purposes at this time to meet county requirements for 1.0 permit applications.](#)
 - Will use of the groundwater well for cannabis irrigation continue under the project? **No**
 - i. If so, a hydrological report from a geologist or hydrogeologist will be required that addresses minimum basic hydrogeologic conditions of the well and area. [In the future the applicant does intend to have a hydrological report prepared for the well, but it is unnecessary at this time, since the well will not be used.](#)

ii. Alternatively, the applicant may consider forgoing use of the well for cannabis irrigation.

- Will any additional water sources (such as rainwater catchment) be added to supplement the POD? [Rainwater catchment will be the source of irrigation. At this time the POD is not implemented or installed.](#)

2. It was previously indicated that annual water use is 94,487 gallons, as per 2021 water use tracking. Please provide associated monthly water use estimates. [Annual water use for cannabis irrigation per 2022 water use tracking \(2021 calendar year\) totals 74,263 gallons. Monthly water use \(in gallons\) from the same year's reporting are listed below:](#)

- January: 0
- February: 0
- March: 500
- April: 1000
- May: 5,800
- June: 8,700
- July: 11,602
- August: 11,601
- September: 34,800
- October: 260
- November: 0
- December: 0

3. Please confirm the size and number of water storage tanks currently located onsite. The attached Site Plan indicates there are 31 tanks totaling 100,100 gallons. However, in previously provided information, it was noted that additional tanks were added on-site, for a total of 115,100 gallons of on-site water storage. [There are 31 water tanks totaling 105,100 gallons of water storage for irrigation currently onsite. The number of water tanks by size is listed below:](#)

- 5,000 gallon = 16 tanks
- 2,500 gallon = 4 tanks
- 1,550 gallon = 9 tanks
- 650 gallon = 1 tank
- 500 gallon = 1 tank

4. The attached Road License Agreement ended on August 1, 2022. Has an updated agreement been prepared? If so, please submit a copy. **ATTACHED**

[ADDITIONAL LACO EMAIL](#)

Hello Kessie,

I'm also hoping a map depicting the access road and the respective parcels it crosses can be provided. This is especially important for noticing the project. The access road is depicted on a topographical map prepared by Pacific Watershed Associates and enclosed with the Road Evaluation; however, individual parcels are not identified and the site access is not discernable on the County's GIS. **ATTACHED**

If any other additional information is needed please let us know as soon as possible.

Kessie Jordan

Executive Assistant

The Law Office Of Eugene Denson

(707) 923-4764 Office

(707) 926-5250 Fax

(707) 499-0328 Cell

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Updated Project Details January 4, 2023

Megan Marruffo

From: Jack Skeahan <JackS@pacificwatershed.com>
Sent: Wednesday, January 4, 2023 10:48 AM
To: Megan Marruffo
Cc: karen silva; Eugene Denson; Kess Jordan; Jack Skeahan
Subject: 51121_Bridgeville Organic Pharms_Humboldt County Application #10822/CUP #16-157 proposal for slight modification and permit documents for staff report
Attachments: 51121 Silva CalCanna Combined premises2022_reduced.pdf; 1 SMALL NANOGRID CANNA SYSTEM.pdf; 51121_BOP_DCC Grant Proposal_Rainwater_vfinal_8-31-2022.pdf; Exhibit B_51121 Silva COP site map_reduced.pdf; Bayside Garden_Water Infrastructure Quote.pdf; Silva, Karen County Notice Receipt of Grant App Sept22_Water.pdf; Silva, Karen County Notice Receipt of Grant App Sept22_Energy.pdf

Hello Megan,

Bridgeville Organic Pharms, LLC (Humboldt County Application #10822/CUP #16-157, APN 210-012-019) would like to propose a slight modification for future cultivation area. This slight modification includes reclassification of previous outdoor open air cultivation area to light deprivation cultivation using raised beds and hoop houses and the relocation of one hoop house (Hoop House #11). This reclassification will include conversion of previously occupied open air outdoor footprints with construction of raised beds and hoop houses at Hoop House #10 (HH #10), HH #11 (proposed for relocation), and HH #12 as shown on the attached Department of Cannabis Control (DCC) Premises Diagram. The applicant would also like to relocate HH #11 to just south of Greenhouse #6 (GH #6) in the western portion of Cultivation Area #2 (CA #2). Relocation of HH #11 to south of GH #6 will reoccupy a previous cultivation footprint area and will meet the 50-foot riparian setback from the Class III stream near the southwest corner of CA #2.

This slight modification will reclassify 840 square feet of existing outdoor open air cultivation area (Outdoor #1 (OD #1) – OD #4)) to outdoor light deprivation cultivation and create an additional 518 square feet of outdoor light deprivation cultivation. This reclassification will not use artificial lighting and will still comply with the county ordinance definition of outdoor cultivation. The additional area will remain under the county approved maximum of 26,025 square feet for outdoor cultivation under this permit. This reclassification will also comply with the maximum cultivation area allowed (22,000 square feet) under the existing DCC medium mixed light license. If this proposal is accepted this cultivation area will be converted to raised beds with light deprivation infrastructure, and HH #11 relocated, after county approval is received and will likely be implemented at the beginning of the 2023 cultivation season.

Reference the attached DCC Premises Diagram and previously submitted County Site Plan for the proposed and existing cultivation areas included in this request for a slight modification.

Also attached are the two previously submitted DCC grant proposals and related documents for rainwater catchment and renewable energy to include with the staff report.

Please confirm receipt of this email at your earliest convenience and if any additional information is needed.

Thank you.

Jack Skeahan, Project Geologist
Pacific Watershed Associates
PO Box 4433, Arcata, CA 95518-4433
707-839-5130
jacks@pacificwatershed.com

Additional Project Information January 4, 2023

Megan Marruffo

From: Jack Skeahan <JackS@pacificwatershed.com>
Sent: Wednesday, January 4, 2023 12:19 PM
To: Meghan Ryan
Cc: karisilva1953@gmail.com; Eugene Denson; kjordan.kjo@gmail.com; Johnson, Cliff; Megan Marruffo; Jack Skeahan
Subject: RE: 51121_Bridgeville Organic Pharms_Humboldt County Application #10822/CUP #16-157 proposal for slight modification and permit documents for staff report

Hi Megan,

This request does not include any additional amount of square footage that would exceed the permitted amount, only a reclassification of the cultivation type of existing square footage (840 square feet from outdoor to light deprivation) and an additional 518 square feet of light deprivation to be cultivated in 2023 and moving forward and that is allowed under the total permitted amount. The total amount of square footage (outdoor plus mixed light) is still 40,025 square feet. The total permitted amount for outdoor cultivation area is 22,985 ft2 and this proposed change will not exceed that amount. The applicant would like to maximize the amount of light deprivation in 2023 while remaining under the allowed DCC mixed light license and county permitted outdoor amounts.

I hope that helps to clarify this request but let the applicant or myself know if you have additional questions.

Thanks.

Jack Skeahan, Project Geologist
Pacific Watershed Associates
PO Box 4433, Arcata, CA 95518-4433
707-839-5130
jacks@pacificwatershed.com

From: Meghan Ryan <ryanm@lacoassociates.com>
Sent: Wednesday, January 4, 2023 11:54 AM
To: Jack Skeahan <JackS@pacificwatershed.com>
Cc: karisilva1953@gmail.com; Eugene Denson <edenson95511@gmail.com>; kjordan.kjo@gmail.com; Johnson, Cliff <CJohnson@co.humboldt.ca.us>; Megan Marruffo <marruffom@lacoassociates.com>
Subject: RE: 51121_Bridgeville Organic Pharms_Humboldt County Application #10822/CUP #16-157 proposal for slight modification and permit documents for staff report

Hi Jack - Clarification of Item 1:

All currently proposed is 40,025 SF. The request would add an additional 518 SF for revised total cultivation area of 40,543 SF?

Thanks!
Meghan

Updated Water Use Estimates

Megan Marruffo

From: Meghan Ryan
Sent: Friday, January 27, 2023 9:11 AM
To: Megan Marruffo
Subject: FW: 51121_Bridgeville Organic Pharms_Humboldt County Application #10822/CUP #16-157 proposal for slight modification and permit documents for staff report



Meghan Ryan
Planning Director
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From: Jack Skeahan <JackS@pacificwatershed.com>
Date: Friday, January 13, 2023 at 10:56 AM
To: Meghan Ryan <ryanm@lacoassociates.com>
Cc: karen silva <karisilva1953@gmail.com>, Kess Jordan <kjordan.kjo@gmail.com>, Eugene Denson <edenson95511@gmail.com>, Jack Skeahan <JackS@pacificwatershed.com>
Subject: RE: 51121_Bridgeville Organic Pharms_Humboldt County Application #10822/CUP #16-157 proposal for slight modification and permit documents for staff report

Hi Megan,

Below is the updated water use information requested for the staff report. The monthly and annual water use estimates use the most recent amounts increased to account for the full permit cultivation amount.

January: 0 gallons
February: 0 gallons
March: 1,200 gallons
April: 2,000 gallons
May: 10,600 gallons
June: 17,400 gallons
July: 21,500 gallons
August: 41,000 gallons
September: 66,800 gallons
October: 58,000 gallons
November: 0 gallons
December: 0 gallons
Total annual use: 166,300 gallons

Existing storage amount: 105,100 gallons.

Proposed storage amount (with approved DCC rainwater grant for 65,000 gallons additional storage): 170,100 gallons.

Let us know if you have any questions or need additional information.

Thanks.

Jack Skeahan, Project Geologist
Pacific Watershed Associates
PO Box 4433, Arcata, CA 95518-4433
707-839-5130
jacks@pacificwatershed.com

From: Meghan Ryan <ryanm@lacoassociates.com>
Sent: Wednesday, January 11, 2023 10:13 AM
To: Jack Skeahan <JackS@pacificwatershed.com>
Subject: RE: 51121_Bridgeville Organic Pharms_Humboldt County Application #10822/CUP #16-157 proposal for slight modification and permit documents for staff report

Hi Jack – Thank you for speaking with me this morning. If you can please respond to this email with updated water usage information, I would appreciate it. Please provide monthly and annual water use. I will include the email as an addendum to the operations plan and condition the project to adhere to the addendum.

We will be able to include in the staff report and the project will move forward on the 19th as noticed. Please provide the updated information today, if possible.

Please let me know if you have any questions.

Thanks!
Meghan



Meghan Ryan
Planning Director
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From: Jack Skeahan <JackS@pacificwatershed.com>
Sent: Wednesday, January 4, 2023 2:03 PM
To: Meghan Ryan <ryanm@lacoassociates.com>
Cc: Jack Skeahan <JackS@pacificwatershed.com>
Subject: RE: 51121_Bridgeville Organic Pharms_Humboldt County Application #10822/CUP #16-157 proposal for slight modification and permit documents for staff report

Hi Meghan,

My extension is 37 but it is usually better to reach me on my cell phone: (707) 616-1511.