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Altan Chimedkhuyag
1632 Broadway # 173
Eureka, CA 95521

RE: Environmental Superiority Analysis and Biological Assessment for Denali Farms (APN: 210-250-008) (Application 10989)

Altan,

The purpose of this letter is to address a portion of the March 15, 2022, deficiency letter from the County of Humboldt Planning and Building Department requesting an “Environmental Superiority Analysis and Biological Assessment” for the proposed relocation of 10,000 square feet of cannabis cultivation on the property. The County also requested a positive identification of the rein orchids (*Piperia* sp.) located on the property in 2020.

As indicated in the 2020 Biological Assessment (BA), the cultivation site in the southwest corner of the property (18) is partially within the Streamside Management Area (SMA) for two streams and associated wetland. The proximity of the cultivation to the aquatic resources increases the potential for delivery of sediment and nitrogen-rich runoff from the site into the watershed, which could impact salmonids and other wildlife downstream.

The 10,000 square feet of cultivation area will be relocated outside of SMAs within or directly adjacent to adjacent existing cultivation and entirely within the exiting disturbance footprint, and within the assessment area of the original BA. There will be no new impacts to native vegetation and no need for additional pre-construction surveys.

Three new greenhouses (GH) will be constructed (6, 11, and 12) and six existing GH will be expanded (1, 2, 5, 9, 10, and 17). The new location for GH6, and the expansion areas for GH1, 2, 5, 9, 10, and 17, are all in areas that have been previously graded and are disturbed from previous cultivation activity. The vegetation is composed of non-native grasses and other herbaceous plants, including sweet vernal grass (*Anthoxanthum odoratum*), dogtail grass (*Cynosurus echinatus*), wild oat (*Avena barbata*), rough cat’s ear (*Hypochaeris radicata*), long-beaked storksbill (*Erodium botyis*), Shepard’s purse (*Capsella bursa-pastoris*), white clover (*Trifolium repens*), and English daisy (*Bellis perennis*). GH 11 and 12 will be constructed on a graded flat previously used for a water bladder that is mostly unvegetated (See attached photos).

Thus, relocation of the cultivation area out of the SMA to other areas that are already disturbed by previous cultivation activity is “environmentally superior” to leaving it in its current location

because it will significantly reduce potential for impacts to aquatic resources. It will also concentrate cultivation activity to a smaller area of the property, potentially benefiting wildlife.

As expected, the rein orchids were not blooming on the April 23, 2022, site visit. Rein orchids typically bloom in late June or July. It is unlikely the plants are the white-flowered rein orchid (*Piperia candida*) based on the leaf morphology, although identification keys rely on floral characters. The plants are likely common royal rein orchid (*Piperia transversa*). The plants are along the edge of the road (ATV trail) to the remediation site and extend in the adjacent forest understory. As indicated in the BA, the plants should not be impacted by normal use and maintenance of the road. Additionally, the road will no longer be used to access cultivation area 18 once it is restored and is not appurtenant to the relocation areas. Thus, it does not seem necessary to revisit the property in June or July to make a positive ID of the plants, which will not be impacted by the project.

Please contact me if you have any questions or need additional information.

Sincerely,

A handwritten signature in black ink that reads "Kyle Wear". The signature is written in a cursive, slightly slanted style.

Kyle Wear

Attachments:

- A. Representative Photos
- B. *Piperia* Map

ATTACHMENT A Representative Photos



Photo 1. Location of GH6 adjacent to GH5 showing typical non-native herbaceous vegetation in areas disturbed by cultivation activity.



Photo 2. Greenhouse 10 (GH 8 in background) with similar non-native vegetation on graded flat.



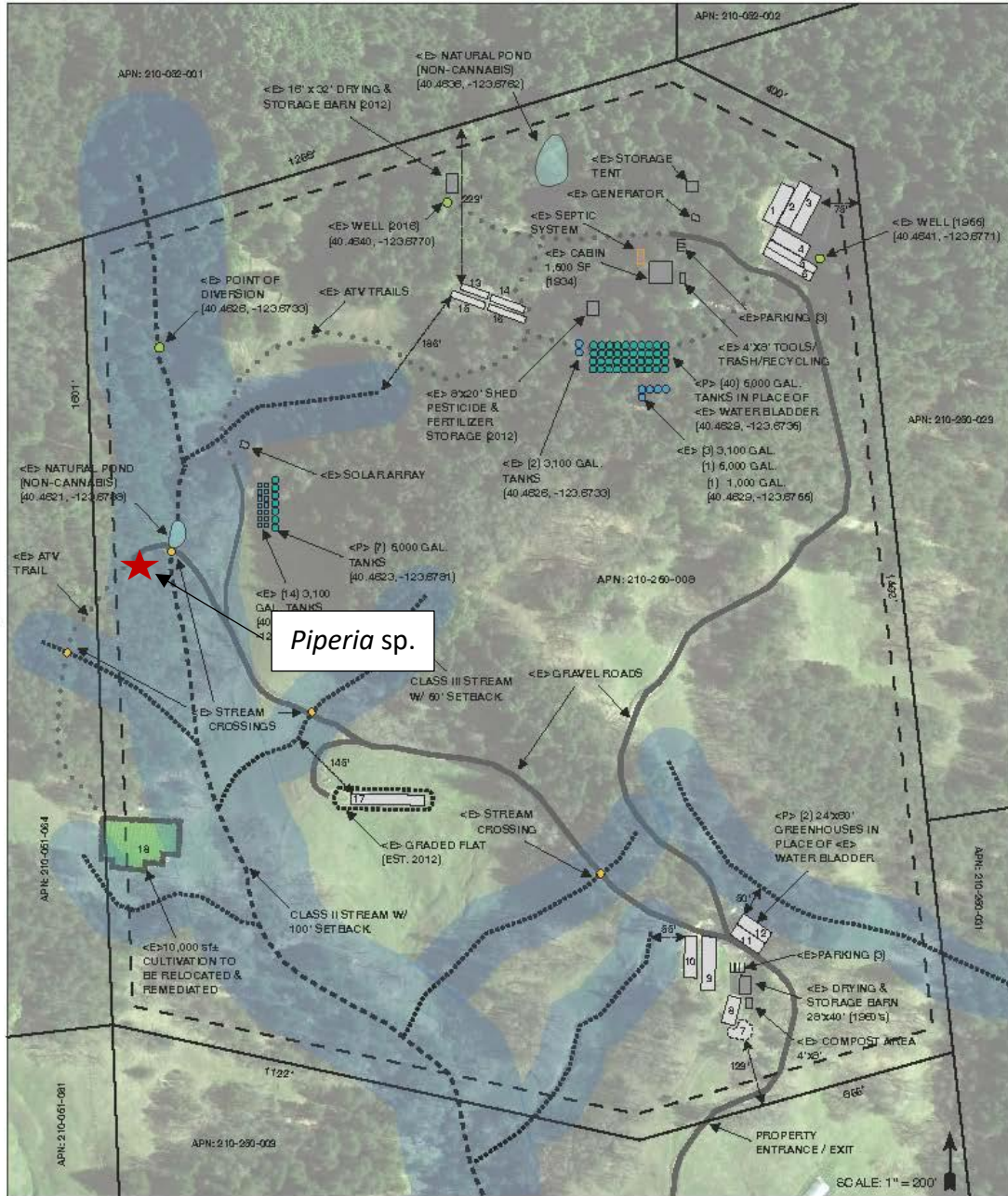
Photo 3. Location for GH 11 and 12 on graded water bladder flat.



Photo 4. Southwest corner of site 18 (remediation site) in SMA for Class III watercourse.

ATTACHMENT B *Piperia* map

**DENALI FARM, LLC
CONDITIONAL USE PERMIT
SITE PLAN
APN: 210-260-008**



PROJECT INFORMATION

CULTIVATION TOTALS: 17,813 SF OUTDOOR
7,713 MIXED LIGHT

WATER SOURCE: RAINWATER CATCHMENT, STREAM DIVERSION, & WELL

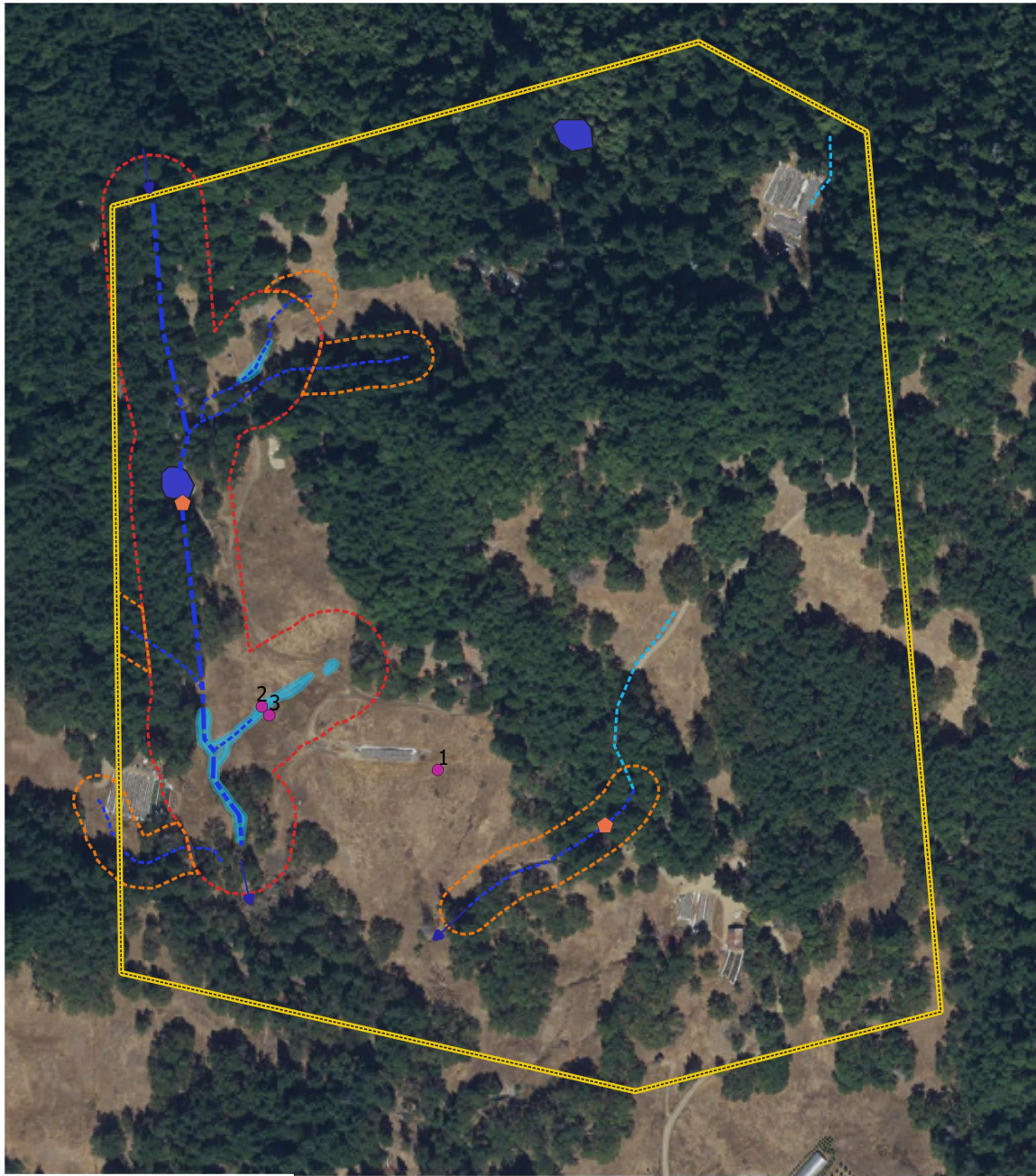
OWNER: DENALI FARM LLC.
PARCEL SIZE: 66.33 AC RES (G/S),
67.6 AC RES ASSESSED

NOTES:

- PROCESSING AND PACKAGING CONDUCTED BY 3RD PARTY PROCESSING FACILITY
- DRAWING SCALE AS NOTED. WRITTEN DIMENSIONS TAKE PREFERRED END OVER SCALED DIMENSIONS.
- THIS IS NOT A BOUNDARY SURVEY NOR HAS THE PROPERTY BOUNDARY BEEN VERIFIED. THE BOUNDARY INFORMATION DEPICTED HAS BEEN OBTAINED FROM HUMBOLDT COUNTY GIS DATA AND CONTAINS MODIFICATIONS.
- STREAMLINE AND ROAD CENTERLINES ARE APPROXIMATE.
- THERE ARE NO SCHOOLS, SCHOOL BUS STOPS, PLACES OF WORSHIP, OR PUBLIC PARKS WITHIN 800' OF THE CULTIVATION SITES.
- THERE ARE NO RESIDENCES WITHIN 300' OF THE CULTIVATION SITES.
- LETTERS AND NUMBERS FOR ROAD SIGNS, ADDRESSES, AND HOUSE NUMBERS SHALL BE A MINIMUM 4 INCH LETTER HEIGHT, 1/2 INCH STROKE, REFLECTORIZED, AND CONTRASTING WITH THE BACKGROUND COLOR OF THE SIGN.
- ALL NOISE LOCATIONS ARE NOTED. NO SENSITIVE RECEPTORS WERE IDENTIFIED.

GREENHOUSE #	EXISTING DIMENSIONS	PROPOSED DIMENSIONS	SQUARE FOOTAGE TOTAL
1	30x70	30x80	2,400
2	24x70	24x90	632 OD / 1528 ML
3	24x80	SAME	1,920 ML
4	30x80	SAME	1,800 ML
5	13x80	13x85	1,105 ML
6	NEW	16x95	1,360 ML
7	OD POTS	SAME	951
8	30x50	SAME	1,500
9	30x75	30x85	2,850
10	24x10	24x75	1,800
11	NEW	24x60	1,200
12	NEW	24x60	1,200
13	10x33	SAME	330
14	10x46	SAME	460
15	13x50	SAME	650
16	12x80	SAME	720
17	20x96	20x156	3,120
18	10,000 sf	REMEDiate	x
OD = OUTDOOR ML = MIXED LIGHT			TOTAL: 17,813 OD 7,713 ML

Figure 2. Aquatic Resources Map.



2018 NAIP Image

- | | | |
|------------------|----------------------|---------------------------|
| Emergent Wetland | Intermittent Stream | Drainage Ditch |
| Ephemeral Stream | Culvert | Sample Point |
| 100-Foot Setback | Existing Cultivation | Approx. Property Boundary |
| 50-Foot Setback | | |
| Pond | | |



100 0 100 200 Feet

