



COUNTY OF HUMBOLDT
PLANNING AND BUILDING DEPARTMENT
CANNABIS SERVICES DIVISION

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Organic Humboldt

Attn: Vincent Patterson
83 Wildflower Ln
Benbow, CA 95542

Rain & Zepp, PLC
517 3rd St., Suite 30
Eureka, CA 95501

RE: Permit Application No. 12312

APN: 214-233-002

Case No.: Cup-16-621

Dear Vincent Patterson,

The County of Humboldt previously conducted a Cultivation Area Verification (CAV) on parcel 214-233-002 on 3/21/18. The original CAV had a few cultivation areas (CA) that were not accounted for as well as had incorrect math performed when totaling the square footage from all the cultivation areas. The applicant's agent submitted a memorandum on 4/25/19 that shows CA #9-16 were not accounted for in the original CAV conducted by the county. The memorandum also shows additional cultivation areas that were not accounted for in CA #7. However, the memorandum provided evidence from two different sources, Google Earth Pro and TerraServer. The basis of the analysis provided by the memorandum used imagery dated 5/29/14 from Google Earth Pro. The agent also used imagery dated 7/31/14 from TerraServer in order to provide evidence of additional cultivation areas that came into existence after 5/29/2014 but was also cultivated during the same growing year. After comprehensive review, the evidence submitted showing additional cultivation areas was found to be valid because the county was able to verify that the existing cultivation prior to 7/31/14 TerraServer imagery did not move or change. However, the square footage was remeasured using county techniques and protocols. With the evidence submitted and imagery dated 5/28/2014 on Google Earth Pro, the county conducted a revised cultivation area verification for APN 214-233-002.

The memorandum states there are no corrections to be made by the county for CA#1-4,6, & 8. Therefore, those areas were excluded when conducting the revised CAV and used the same numbers that were previously recorded. The memorandum also states CA #5 is located on a neighboring parcel and was used when conducting the original CAV. Both the Memorandum and the revised county CAV excludes CA #5. The focus of the revised county CAV is to verify the missing cultivation areas that were not included in the original CAV and to justify any inconsistencies between the county CAV and memorandum.

The memorandum suggested the following corrections:

- o Correct totals calculated from cultivation areas identified in the table in the CAV document to read: 22,434 square feet (sf) mixed light and 13,455 sf outdoor instead of 20,434 sf mixed light and 16,155 sf outdoor.
- o Assign the amount over 22,000 sf in the new total mixed light above to authorized outdoor cultivation. (434 sf).
- o Subtract 1,300 sf from authorized outdoor because cultivation from a neighboring parcel was misattributed to the subject parcel (CA#5 in CAV).
- o Add missing cultivation square footage from cultivation areas CA#7 & CA#9-16 documented below.

Findings

The Revised CAV conducted by the County of Humboldt utilizes imagery dated 5/28/14 from Google Earth Pro in order to be consistent with the imagery used in the memorandum submitted on 4/25/19. After comprehensive review the County of Humboldt found there were discrepancies between the original CAV conducted and the memorandum. As a result, the county revised its original CAV and found the following:

Table 1 shows a summary of the totals from the County Revised CAV and the Memorandum.

Summary Table with County Revised Cultivation Area Verification				
Cultivation Area	County Revised CAV		Memorandum	
	Outdoor	Mixed Light	Outdoor	Mixed Light
1	-	2,500	-	2,500
2	4,000	5,300	4,000	5,300
3	-	1,450	-	1,450
4	-	300	-	300
5	-	-	-	-
6	3,200	1,250	3,200	1,250
7	5,509	8,260	6,291	8,260
8	600	3,374	600	3,374
9	2,067	2,267	4,692	-
10	3,118	744	4,876	-
11	-	1,794	2,426	-
12	3,070	1,824	5,691	-
13	-	880	850	-
14	1,446	520	1,836	-
15	476	2,478	3,363	-
16	3,001	-	2,973	-
Total	29,642	27,295	40,798	22,434
Totals after moving excess mixed light to outdoor:	34,937	22,000	41,232	22,000

Table 1: Summary Table with County Revised Cultivation Area Verification & Agents Memorandum. This table does not reflect the totals after moving excess mixed light to outdoor.

The County of Humboldt verified 29,642 square feet of existing outdoor cannabis cultivation and 27,295 square feet of existing mixed light cannabis cultivation. Making a total of 56,937 square feet of cannabis cultivation verified on parcel 214-233-002 by the County of Humboldt.

Table 1 in the memorandum indicates that the agent wants the excess mixed light that over exceeds 22,000 square feet to be converted into outdoor cultivation. The county accepted the conversion and verified a total of 34,937 square feet of existing outdoor cannabis cultivation and 22,000 square feet of mixed light cannabis cultivation.

Figure 1: Overview of the revised cultivation areas



Figure 2: Numbers #1-8 highlighted in green are the 8 missing outdoor additional cultivation areas that were identified in the Memorandum. The areas highlighted in red show cultivation areas that were previously accounted for.



CA #7 Missed Cultivation Sites	
Area Number	COUNTY Square Footage Verified in CAV (sf)
1	650
2	45
3	41
4	121
5	51
6	33
7	87
8	126
Total:	1,154

Table 1: Revised Cultivation Areas Previously Not Accounted For In CA #7

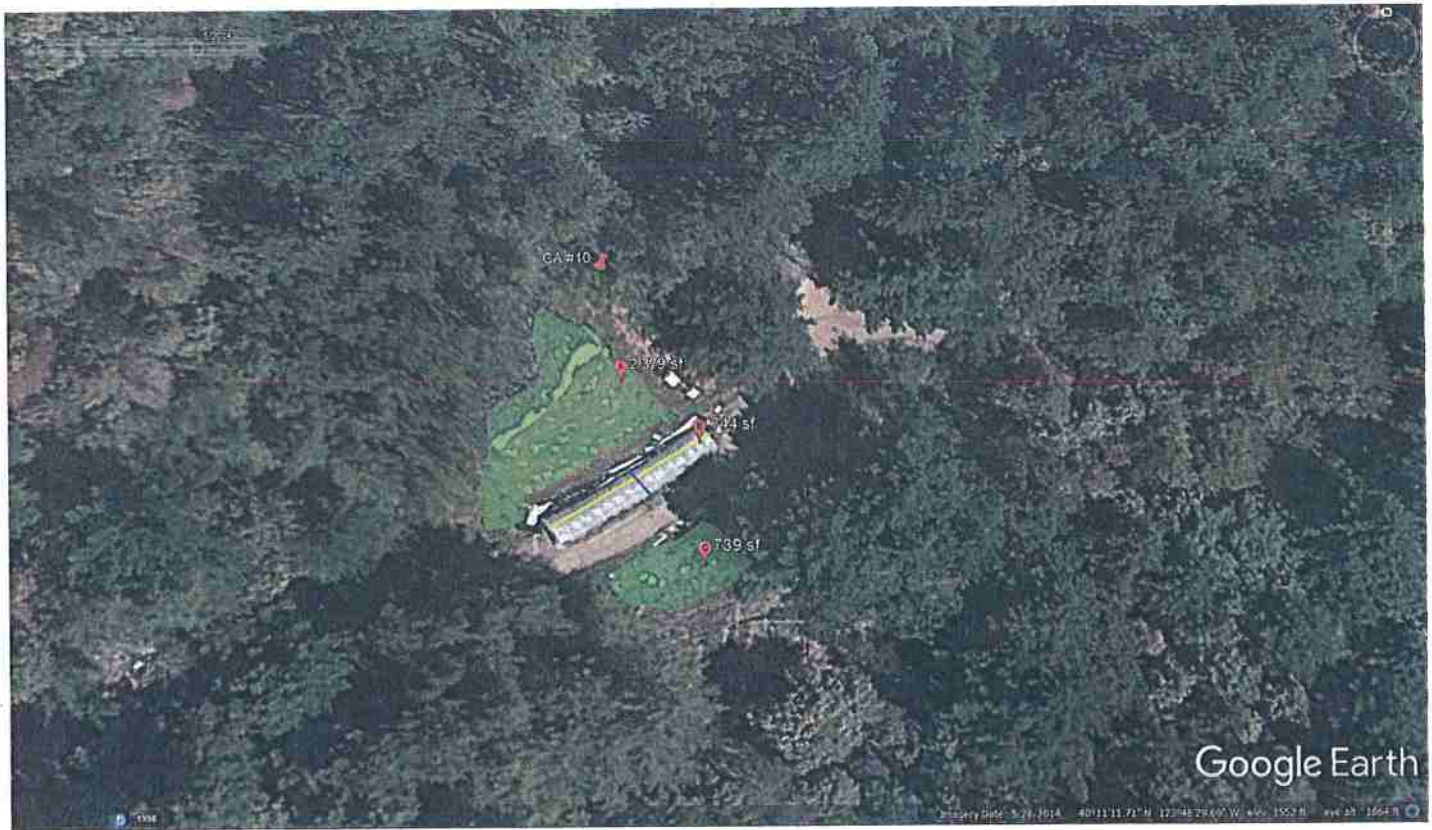
Figure 3: Revised County CA #9



County Revised CA #9		
Cultivation Area	Outdoor	Mixed Light
A	-	480
B	-	780
C	-	1,007
D	200	-
E	383	-
F	276	-
G	219	-
H	849	-
I	140	-
Total	2,067	2,267

Table 2: Summary of Revised County CAV #9

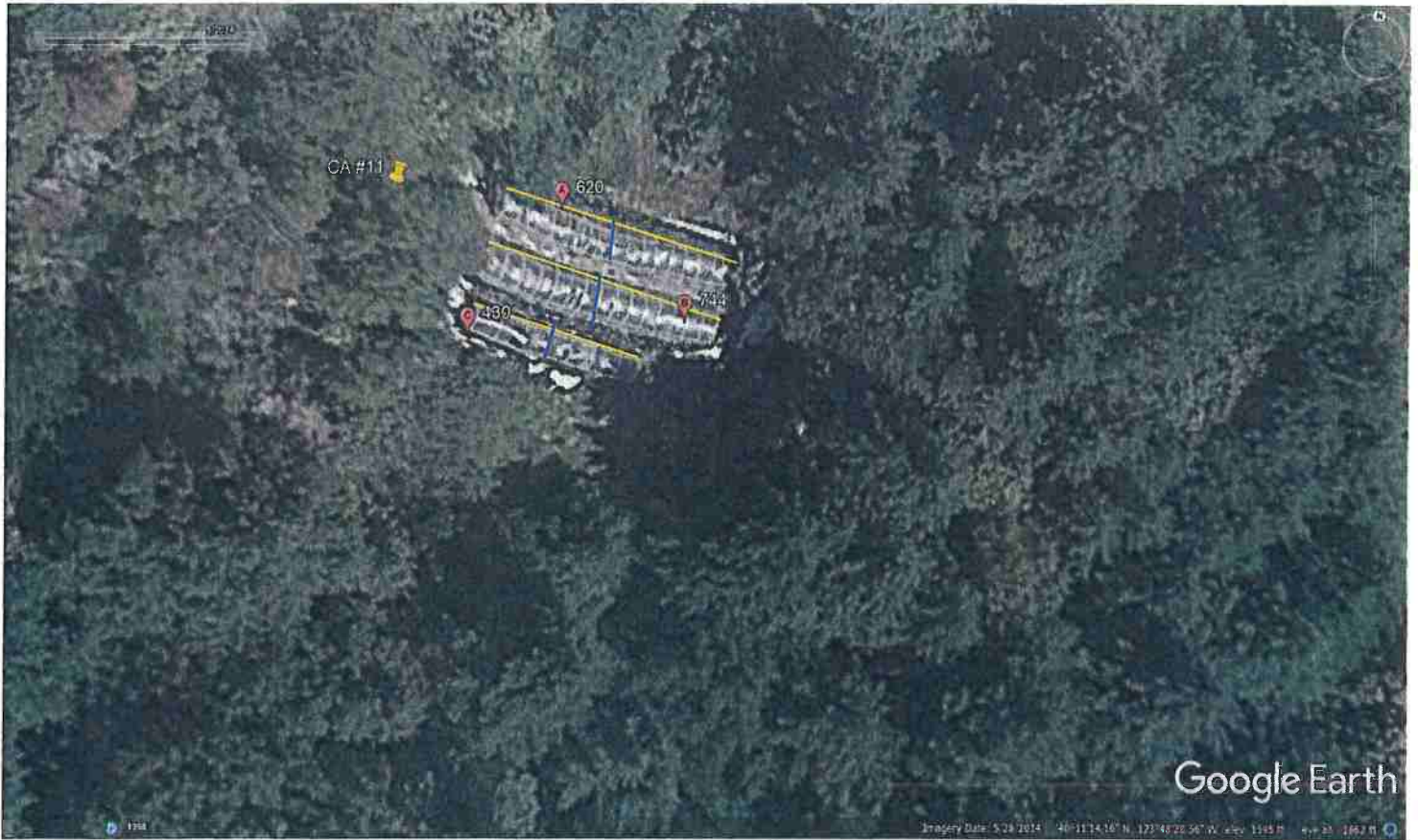
Figure 4: Revised County CA #10



County Revised CA #10		
Cultivation Area	Outdoor (sf)	Mixed Light (sf)
A	2,379	-
B	-	744
C	739	-
Total	3,118	744

Table 3: Summary of Revised County CAV #10

Figure 5: Revised County CA #11



County Revised CA #11		
Cultivation Area	Outdoor (sf)	Mixed Light (sf)
A	-	620
B	-	744
C	-	430
Total	-	1,794

Table 4: Summary of Revised County CAV #11

Figure 6: Revised County CA #12



County Revised CA #12		
Cultivation Area	Outdoor (sf)	Mixed Light (sf)
A	525	-
B	415	-
C	1,171	-
D	959	-
E	-	560
F	-	520
G	-	744
Total	3,070	1,824

Table 5: Summary of Revised County CAV #12

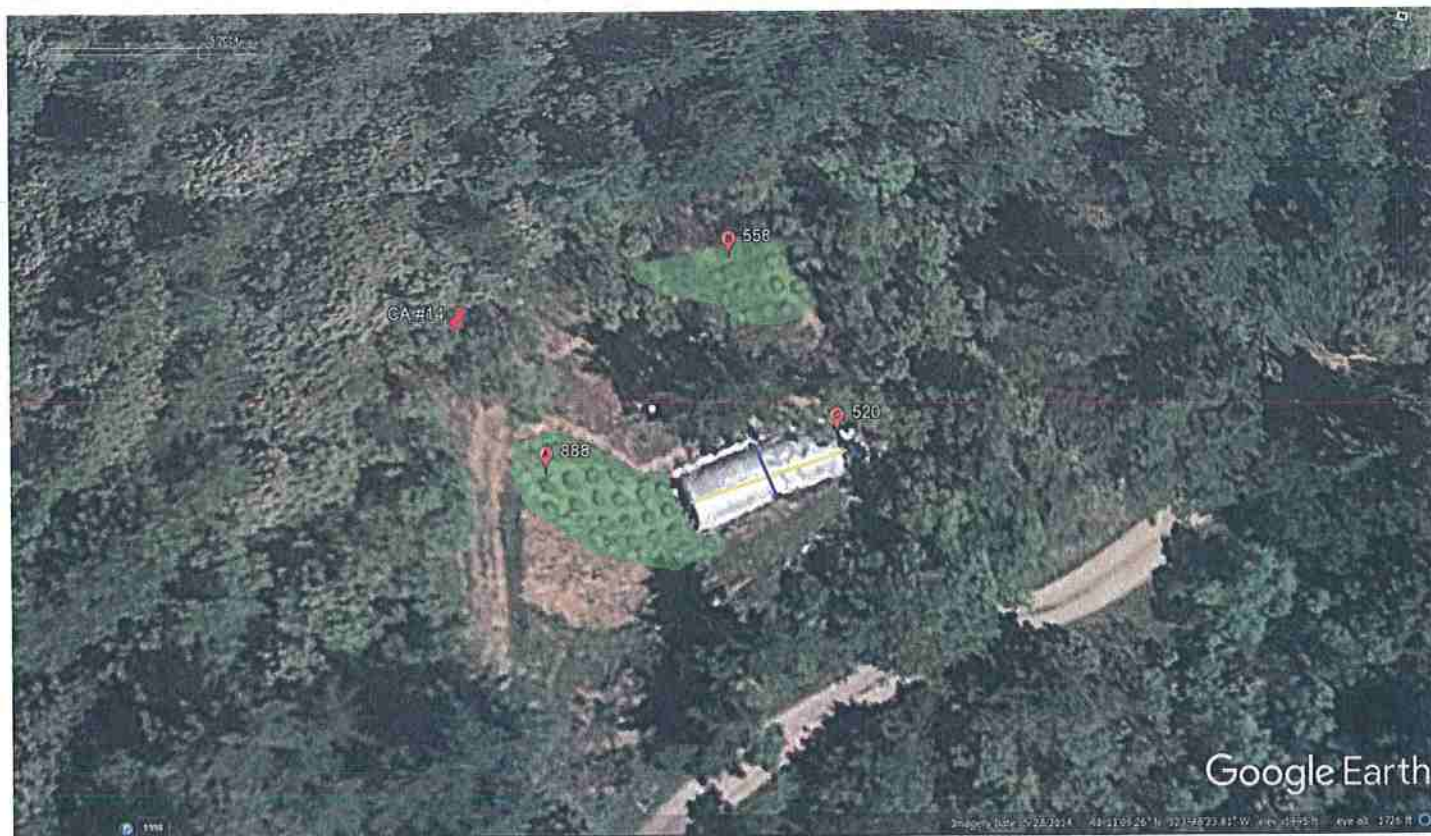
Figure 7: Revised County CA #13



County Revised CA #13		
Cultivation Area	Outdoor (sf)	Mixed Light (sf)
A	-	880
Total	-	880

Table 6: Summary of Revised County CAV #13

Figure 8: Revised County CA #14



County Revised CA #14		
Cultivation Area	Outdoor (sf)	Mixed Light (sf)
A	888	-
B	558	-
C	-	520
Total	1,446	520

Table 7: Summary of Revised County CAV #14

Figure 9: Revised County CA #15



County Revised CA #15		
Cultivation Area	Outdoor (sf)	Mixed Light (sf)
A	105	-
B	-	252
C	-	328
D	-	806
E	-	732
F	-	360
G	77	-
H	73	-
I	73	-
J	148	-
Total	476	2,478

Table 8: Summary of Revised County CAV #15

Figure 10: Revised County CA #16



County Revised CA #16		
Cultivation Area	Outdoor (sf)	Mixed Light (sf)
A	3,001	-
Total	3,001	-

Table 9: Summary of Revised County CAV #16