



ETA Humboldt &lt;etahumboldt@gmail.com&gt;

## Revocation Status of Mana Farms (PLN-12280-CUP)

1 message

ETA Humboldt &lt;etahumboldt@gmail.com&gt;

Fri, Jan 10, 2025 at 1:33 PM

To: "Ford, John" &lt;JFord@co.humboldt.ca.us&gt;

Cc: "Johnson, Cliff" &lt;CJohnson@co.humboldt.ca.us&gt;, Kathy Hall &lt;katann5@yahoo.com&gt;, Mack O'Shaughnessy &lt;mack@etahumboldt.com&gt;, "Kein, Michael" &lt;mkein2@co.humboldt.ca.us&gt;

Greetings Mr. Ford,

First, Happy New Year to you and your staff – thank you so much for serving our community over the past years.

I am writing to you today regarding one of my clients, Kathy Ann Hall of Mana Farms LLC. Humboldt County Permit PLN-12280-CUP (Permit) is attached to APN 208-111-028 (Subject Parcel). Ms. Hall's Permit is currently suspended and – as far as I know – is still referred to the Board of Supervisors for a revocation hearing based on observations made during a non-consent inspection of the Subject Parcel on 24 October 2024.

As I believe you are aware, Ms. Hall has appealed the Planning Department's decision to suspend the Permit based on several inaccuracies listed in the "Summary of issues" portion of the *Notice of Suspension* letter dated 31 October 2024 (see bulleted list below). To the best of my knowledge, the matter involving Ms. Hall's permit at the Subject Parcel has been postponed before the BOS on a couple of occasions. **The purpose of this email is to respectfully request that this matter be immediately and indefinitely removed from the BOS agenda, given Ms. Hall's demonstrable intent to remediate issues of environmental and regulatory concern at the Subject Parcel.**

Please recall the following inaccuracies in the "Summary of issues," which are also listed in Ms. Hall's *ACIR Response Letter*, dated 4 November 2024:

- Issue 1 is based on false assumptions regarding the use of well infrastructure and a misreading of the installed water meter at the Subject Parcel;
- Issue 4 is based on the incorrect assumption that all *Conditions of Approval* were due prior to the 24 October inspection;
- Issue 5 is based on the incorrect assumption that LSAA Notification No. EPIMS-HUM-04338-R1C was not officially transferred by original applicant Brandon Rivas to current Permittee Kathy Ann Hall on 15 November 2023
- Issue 6 includes an error regarding waste oil, which is not now and never has been confirmed as present at the Subject Parcel. All waste related to permitted cultivation of cannabis at the Subject Parcel has been removed and disposed of properly. Receipts for this work are available upon request.
- Issues 2 and 3 are currently in progress and should not alone be grounds for immediate suspension/revocation given Ms. Hall's documented responsiveness to notices and inquiries from Humboldt County and resource protection agencies.

To date, Ms. Hall has made substantial progress toward remediating all violations of relevant environmental protection regulations and industry agreements. She has retained my firm for the purposes of assisting with this remediation/clean-up effort at her own expense, despite the market and margin pressures we all feel during this difficult time. In addition to her correspondence with your office, Ms. Hall has also demonstrated forward progress with agency regulators including Ms. Adona White at the North Coast Regional Waterboard. A photograph log documenting the remediation work

performed by Ms. Hall has been prepared by my firm and is available upon request. **It is my professional opinion that Ms. Hall has made substantial progress toward addressing alleged violations at the Subject Parcel and she has done so in good-faith toward promptly resolving all issues and achieving full compliance with the terms of the Permit since receiving *Suspension Notice* on 31 October 2024.**

I've also taken this opportunity to review public information regarding previous Humboldt County Permit Revocation cases brought before the Board of Supervisors since Prop 64 went into effect. **It is my firm belief that Ms. Hall's case does not yet meet historical precedent for a Revocation Hearing, especially considering the timeline of events since 24 October 2024.**

Other previously revoked permits (e.g. Grebo LLC Conditional Use Permit, Record Number PLN-11207-CUP, attached) were given multiple notices and opportunities to discuss the suspension/revocation over the course of many months between inspection and revocation. The revocation process for Grebo LLC began with a failed county site inspection in July 2022, included a second site inspection in February 2023, and concluded in Revocation in March 2024. During the nearly full year after the second annual inspection, Grebo LLC was determined to be non-responsive to several attempts made by Humboldt County to allow the permittee to address alleged violations.

**In approximately two (2) months (during the winter holidays, for what it's worth), Ms. Hall has experienced what I can only describe as a fast-track to revocation.** Unlike the Grebo case described above, Ms. Hall has been highly responsive to all notices and correspondence with Humboldt County and relevant resource protection agencies. Furthermore, Ms. Hall does not have outstanding balances or unpaid permit fees, which seems to be a common thread of the few revocation cases I've been able to research (e.g. Highpoint Honeydew Farm, LLC Record Number PLN-2018-15260, attached). It should be noted that Highpoint was operating without any state cultivation permits, an important distinction from Ms. Hall who has historically demonstrated a reasonable willingness to operate her business according to local and state compliance standards. It should also be noted that nearly six (6) months lapsed between Highpoint's failed inspections/NOV and subsequent permit revocation. Based upon my research, Ms. Hall should have several additional months to address alleged violations at the Subject Parcel before a revocation hearing.

Finally, Mr. Ford, I urge you to consider our current economic conditions as you come to your conclusions regarding Ms. Hall and the Subject Parcel. If we embrace quick revocation of our community's ability to earn income, we accept that important restoration and cannabis remediation efforts will likely never be funded or completed. In my opinion, identifying issues and helping our community resolve them is the type of legacy this industry and this community deserves.


Thank you for considering this lengthy message – I truly have faith in Ms. Hall's commitment to resolving the listed concerns and I stand behind members of my community trying to improve and do the right thing.

Most sincerely,

Vanessa Valare

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**ETA Management Group LLC/ ETA Humboldt LLC**  
Environmental and Land-Use Consulting  
DBE, WBE, SB-Micro/PW, HUBZone, WOSB

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 [etahumboldt@gmail.com](mailto:etahumboldt@gmail.com)





# ETA Management Group LLC

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DBE: 51189 | DIR: PW-LR-1000988827 | SB-Micro/PW: 2027799 | CUPC WBE | WOSB

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6 January 2025

**TO: North Coast Regional Water Quality Control Board**

c/o Adona White, Water Resource Control Engineer  
adona.white@waterboards.ca.gov  
(707) 576-2672

**FROM: ETA Management Group LLC**

1150 Evergreen Road, Ste 2  
Redway, CA 95560  
(707) 923-1180

**RE: Mana Farms LLC – Permittee Kathy Ann Hall**

*formerly known as* Rockaway Investments, LLC – Permittee Brandon Rivas  
APN: 208-111-028; WQ 2023-0102-DWQ; WDID 1\_12CC401264

Dear Ms. White:

Please accept the following document on behalf of Permittee Kathy Ann Hall of Mana Farms LLC. This filing includes a brief cover letter which summarizes listed complaints alleged by North Coast Regional Water Quality Control Board (“NCRWQCB”) stemming from a non-consent criminal search warrant inspection of Humboldt County Assessor’s Parcel Number (“APN”) 208-111-028, conducted on 24 October 2024. The subject parcel is located at 27710 State Highway 36, Bridgeville, CA. Property boundaries for this site are located within the Little Larabee Creek/Van Duzen River Watershed in eastern Humboldt County.

In addition to this cover letter, a comprehensive photograph log which documents the Permittee’s good faith efforts during November and December 2024 to correct alleged violations is included in this submission. Alleged violations of California Water Code, Basin Plan, and Cannabis General Order were recorded at the subject parcel during the 24 October non-consent inspection and presented to the Permittee in a *Notice of Violation* (“NOV”) letter dated 22 November 2024.

At her own expense, Ms. Hall has retained professional environmental consulting services from our firm, ETA Management Group LLC, for the purpose of efficiently and thoroughly managing corrective actions intended to resolve any and all outstanding environmental concerns and alleged threats to Waters of the State brought forth by NCRWQCB.

## SUMMARY OF ALLEGED VIOLATIONS

As previously stated, this filing is intended to address alleged violations of California environmental protection regulations and State policies regarding permitted cannabis cultivation, as enumerated in the NOV letter prepared by NCRWQCB and dated 22 November 2024. More specifically, the NOV alleges that conditions observed at the subject parcel during the October criminal search warrant inspection constitute violations of the following regulatory provisions<sup>1</sup>:

- *California Water Code §13260, 13261(a), 13264(a), 13265(a), 13350 (a)*
- *Basin Plan § 4.2.1, Prohibitions 1, 2*
- *Cannabis Policy and General Order No. WQ 2019-0001-DWQ*
- *Cannabis General Order, Attachment A*
  - *§ 1 General Requirements*
  - *§ 1 Prohibitions Nos. 25, 26, 27, 31*
  - *§ 2 Prohibitions Nos. 4, 7, 12, 15, 17, 21-26, 28, 29, 31, 48, 49, 53, 56, 57, 62, 66, 69, 73, 77, 108, 113, 117, 119, 120, 131, 133*

In the apparent interest of brevity and clarity, NCRWQCB reported and categorized site conditions at the subject parcel during the 24 October 2024 inspection. The following site condition classifications were determined to pose threat to Waters of the State and are reproduced from the original NOV letter below<sup>2</sup>:

1. Improper storage, handling and containment of spent waste oil, resulting in threats of discharges to land and threats of discharges to surface water and ground water.
2. Improper storage, containment and disposal of cultivation related plastic refuse.
3. Improper storage and disposal of potting soil.
4. Steep, poorly maintained roads causing concentration of stormwater runoff, erosion, transport and delivery of sediment to waters of the state with threats to surface water habitat and water quality.
5. Undersized stream crossings that pose a threat of sediment delivery to surface waters.
6. Refuse and disturbance in riparian setbacks.

## SUMMARY OF REMEDIATIVE ACTIONS COMPLETED TO DATE

Given the apparent severity of the allegations levied upon the subject parcel stemming from the 24 October criminal search warrant inspection, Permittee Kathy Ann Hall has demonstrated a willingness to remediate environmental violations alleged by NCRWQCB. Between November and December 2024, the Permittee documented significant remediation efforts at the subject parcel intended to achieve compliance with relevant regulatory requirements and mitigate

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<sup>1</sup> More detail regarding alleged regulatory violations, including *verbatim* regulation language, is available in *Notice of Violation* letter prepared by NCRWQCB, dated 22 November 2024 (*Attachment A, pp. 1 – 10*).

<sup>2</sup> Reproduced from *Notice of Violation* letter prepared by NCRWQCB, dated 22 November 2024 (*p. 3*).

potential threats to the long-term health of the Little Larabee/Van Duzen Watershed. It should also be noted that several of the alleged environmental violations listed in the 22 November NOV letter were either based on false assumptions (i.e. Violation Point 10) or are located on neighboring parcels not owned or managed by the Permittee (i.e. Violation Points 18 and 20).

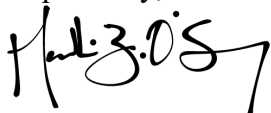
Briefly, the Permittee has documented substantial efforts to remove and properly dispose of waste materials associated with permitted cannabis cultivation, including plastic refuse and spent potting soil. Significant work has also been completed toward resolving stormwater discharge and erosion concerns noted during the 24 October inspection. Additional remediation efforts (especially as related to culvert/stream crossing improvements) are currently in the planning phase and are expected to be completed promptly.

Please refer to the attached photograph log, which demonstrates remediation/restoration efforts completed by the Permittee between November and December 2024. Also attached are receipts which document proper waste/refuse disposal from the subject and neighboring parcels during this time period.

In addition to remediation/restoration work performed at the subject parcel, the Permittee has also retained environmental consulting services for the purpose of securing required compliance permits related to domestic use water rights to Little Larabee Creek and water quality/wastewater discharge. At this time, the Permittee is not maintaining and/or operating any diversion infrastructure in or near Little Larabee Creek.

**On behalf of listed property owners and managers, ETA Management Group LLC respectfully requests an indefinite moratorium on any punitive enforcement actions at the subject parcel.** It is our professional opinion that the Permittee has taken appropriate steps towards remediating environmental concerns and fully intends to proceed toward full compliance with California regulations regarding permitted cannabis cultivation. Furthermore, administrative civil liabilities would surely bankrupt the Permittee and the alleged violations not yet remediated would continue to pose threats to salmon-bearing waters of the State of California. Should the Permittee fail to follow through with addressing the concerns presented by NCRWQCB in the future, progressive enforcement actions can always be reconsidered. However, given the clearly depressed market conditions in our area, it seems reasonable to allow Ms. Hall an opportunity to correct environmental and regulatory violations in a timely manner.

Respectfully,



**Mack O'Shaughnessy**

*ETA Management Group LLC*

[mack@etahumboldt.com](mailto:mack@etahumboldt.com) | (707) 923-1180

NCRWQCB Violation Point	Humboldt County APN:
1	208-111-028



*Fig. I.1 Cultivation area CA2. Photo by NCRWQCB, 24 October 2024.*



*Fig. I.2 Cultivation area CA2. Photo by Permittee, 20 December 2024.*



NCRWQCB Violation Point	Humboldt County APN:
2	208-111-028



*Fig. 2.1 Surface water diversion with gas pump in Little Larabee Creek. Photo by NCRWQCB, 24 October 2024.*



*Fig. 2.2 Gas pump on stream at Point 2 on Little Larabee Creek. Photo by NCRWQCB, 24 October 2024.*

NCRWQCB Violation Point	Humboldt County APN:
2	208-111-028



*Figs. 2.3-5 Surface water point of diversion, intake, and screen in Little Larabee Creek. Photos by NCRWQCB, 24 October 2024.*

All diversion infrastructure removed by resource protection agents.

No remediation photos necessary.

NCRWQCB Violation Point	Humboldt County APN:
3	208-111-028



*Fig. 3.1 Water bar needs to be reinforced. Photo by NCRWQCB, 24 October 2024.*

NCRWQCB Violation Point	Humboldt County APN:
3	208-111-028



*Fig. 3.2 Water bar recut. Photo by Permittee, 20 December 2024.*

NCRWQCB Violation Point	Humboldt County APN:
4	208-111-028



*Fig. 4.1 Driveway to CA2 is steep and lacks drainage; stormwater runoff is concentrated into the cultivation and storage area.  
Photo by NCRWQCB, 24 October 2024.*



*Figs. 4.2-3 Road drainage into CA2. Photos by NCRWQCB, 24 October 2024.*

NCRWQCB Violation Point	Humboldt County APN:
4	208-111-028



*Fig. 4.4 Drainage improvements draw storm water away from CA2. Photo by Permittee, 20 December 2024.*

NCRWQCB Violation Point	Humboldt County APN:
4	208-111-028



*Fig. 4.5 Drainage improvements draw storm water away from CA2. Photo by Permittee, 20 December 2024.*

NCRWQCB Violation Point	Humboldt County APN:
5	208-111-028



*Figs. 5.1-2 Potting soil improperly disposed of on the fill slope of the graded flat at CA2. Photo by NCRWQCB, 24 October 2024.*



NCRWQCB Violation Point	Humboldt County APN:
5	208-111-028



*Fig. 5.3 Potting soil covered on fill slope of the graded flat at CA2. Photo by Permittee, 20 December 2024.*



*Fig. 5.4 Potting soil covered on fill slope of the graded flat at CA2. Photo by Permittee, 20 December 2024.*

NCRWQCB Violation Point	Humboldt County APN:
Unclear, Not Indicated – “Figure 18, 19”	208-111-028



***Figs. 6.1-2** Fill slope at CA2, Violation/Remediation points not specified by NCRWQCB, labeled Figs 18, 19.  
Photos by NCRWQCB, 24 October 2024.*

NCRWQCB Violation Point	Humboldt County APN:
Unclear, Not Indicated – “Figure 18, 19”	208-111-028



**Fig. 6.3** Erosion control implemented at fill slope near CA2. Photo by Permittee, 20 December 2024.

NCRWQCB Violation Point	Humboldt County APN:
Unclear, Not Indicated – “Figure 20, 21”	208-111-028



**Fig. 7.1** Fill slope of CA2 with two foot vertical displacement of the fill. Violation/Remediation point not specified by NCRWQCB, labeled Fig 20. Photo by NCRWQCB, 24 October 2024.



**Fig. 7.2** CA2 with two vertical displacement of the fill. Violation/Remediation point not specified by NCRWQCB, labeled Fig 21. Photo by NCRWQCB, 24 October 2024.

NCRWQCB Violation Point	Humboldt County APN:
Unclear, Not Indicated – “Figure 20, 21”	208-111-028



*Fig. 7.3 Erosion control implemented at fill slope near CA2. Photo by Permittee, 20 December 2024.*

NCRWQCB Violation Point	Humboldt County APN:
Unclear, Not Indicated – “Figure 20, 21”	208-111-028



*Fig. 7.4 Erosion control implemented at fill slope near CA2. Photo by Permittee, 20 December 2024.*

NCRWQCB Violation Point	Humboldt County APN:
Unclear, Not Indicated – “Figure 22”	208-111-028



*Fig. 8.1 Refuse from CA2 is accumulated at the edge of the 50 foot setback to the Class III watercourse. Violation/Remediation point not specified by NCRWQCB, labeled Fig 22. Photo by NCRWQCB, 24 October 2024.*

NCRWQCB Violation Point	Humboldt County APN:
Unclear, Not Indicated – “Figure 23, 24”	208-111-028



**Fig. 8.2** Refuse from CA2 is accumulated at the edge of the 50 foot setback to the Class III watercourse. Violation/Remediation point not specified by NCRWQCB, labeled Fig 23. Photo by NCRWQCB, 24 October 2024.



**Fig. 8.3** Refuse from CA2 is accumulated at the edge of the 50 foot setback to the Class III watercourse. Violation/Remediation point not specified by NCRWQCB, labeled Fig 24. Photo by NCRWQCB, 24 October 2024.



NCRWQCB Violation Point	Humboldt County APN:
Unclear, Not Indicated – “Figure 23, 24”	208-111-028



*Fig. 8.4 Refuse mitigation performed by Permittee; dump receipts attached.  
Photo by Permittee, 20 December 2024.*

NCRWQCB Violation Point	Humboldt County APN:
Unclear, Not Indicated – “Figure 23, 24”	208-111-028



*Fig. 8.5 Refuse mitigation performed by Permittee; dump receipts attached.  
Photo by Permittee, 20 December 2024.*

NCRWQCB Violation Point	Humboldt County APN:
Unclear, Not Indicated – “Figure 23, 24”	208-111-028



*Fig. 8.6 Refuse mitigation performed by Permittee; dump receipts attached.  
Photo by Permittee, 20 December 2024.*

NCRWQCB Violation Point	Humboldt County APN:
Unclear, Not Indicated – “Figure 23, 24”	208-111-028



*Fig. 8.7 Refuse mitigation performed by Permittee; dump receipts attached.  
Photo by Permittee, 20 December 2024.*

NCRWQCB Violation Point	Humboldt County APN:
Unclear, Not Indicated – “Figure 23, 24”	208-111-028



*Fig. 8.7 Refuse mitigation performed by Permittee; dump receipts attached.  
Photo by Permittee, 20 December 2024.*

NCRWQCB Violation Point	Humboldt County APN:
9	208-111-028



*Figs. 9.1-2 Willow and pennyroyal along cutbank in disturbed area and in cultivation area at CA2.  
Photos by NCRWQCB, 24 October 2024.*

No remediation actions recommended by NCRWQCB and no action taken by Permittee.

No remediation photos necessary.

NCRWQCB Violation Point	Humboldt County APN:
10	208-111-028



*Fig. 10.1 Open tote of waste oil, located on a slope.  
Photo by NCRWQCB, 24 October 2024.*

NCRWQCB Violation Point	Humboldt County APN:
10	208-111-028



**Fig. 10.2** Refuse mitigation performed by Permittee; dump receipts attached. No motor oil at site, actually organic soil amendment in container. No hazardous materials, but cannabis cultivation waste remediated by Permittee.  
 Photo by Permittee, 20 December 2024.



NCRWQCB Violation Point	Humboldt County APN:
11A, 11B	208-111-028



*Fig. 11.1 Plastic remnants from old erosion control measures remain on the landscape. Point 11A.  
Photo by NCRWQCB, 24 October 2024.*



*Fig. 11.2 Juncus and willow near cultivation area CA1. Photo by NCRWQCB, 24 October 2024.*

Plastic refuse from previous erosion control measures removed from property.

No remediation actions taken by Permittee at Point 11B. No remediation photos necessary.

NCRWQCB Violation Point	Humboldt County APN:
12	208-111-028



*Fig. 12.1 Class III watercourse upstream of road crossing at Point 12.  
Photo by NCRWQCB, 24 October 2024.*

No remediation actions recommended by NCRWQCB and no action taken by Permittee.  
No remediation photos necessary.

NCRWQCB Violation Point	Humboldt County APN:
12	208-111-028



*Figs. 12.2-3 The stream crossing is undersized and comprised of two stacked box pipes. Photos by NCRWQCB, 24 October 2024.*

Project in planning phase.

No remediation photos available at this time.

NCRWQCB Violation Point	Humboldt County APN:
12	208-111-028



*Fig. 12.4 The access road ditch and rilled road surface poses threat of sediment delivery to the stream crossing at Point 12.  
Photo by NCRWQCB, 24 October 2024.*

Project in planning phase.

No remediation photos available at this time.

NCRWQCB Violation Point	Humboldt County APN:
13	208-111-028



*Fig. 13.1 Well located at Point 13, within the cultivation area CA1. The well was unplugged.  
Photo by NCRWQCB, 24 October 2024.*

NCRWQCB Violation Point	Humboldt County APN:
13	208-111-028



*Fig. 13.2 Well site, Permittee keeps well unplugged from power when not in use.  
Photo by Permittee, 20 December 2024.*

NCRWQCB Violation Point	Humboldt County APN:
14	208-111-028



*Fig. 14.1 Well located at Point 14, within the cultivation area CA1. The well was unplugged.  
Photo by NCRWQCB, 24 October 2024.*

NCRWQCB Violation Point	Humboldt County APN:
14	208-111-028



*Fig. 14.2 Generator stored indoors when not in use. County officials recommended kiddie pool as secondary containment when in use outside. Photo by Permittee, 20 December 2024.*



NCRWQCB Violation Point	Humboldt County APN:
15	208-111-028



*Fig. 15.1 Point 15 CAI. Photo by NCRWQCB, 24 October 2024.*



*Fig. 15.2 Point 15 CAI. View to Access Road. Photo by NCRWQCB, 24 October 2024.*

NCRWQCB Violation Point	Humboldt County APN:
15	208-111-028



*Fig. 15.3 Point 15 CA1. Photo by Permittee, 20 December 2024.*

NCRWQCB Violation Point	Humboldt County APN:
15	208-111-028



*Fig. 15.4 Point 15 CAI. View to Access Road. Photo by Permittee, 20 December 2024.*

NCRWQCB Violation Point	Humboldt County APN:
16	208-111-028



*Fig. 16.1 The surface water diversion line from Point 2 connects to water storage tanks above CAI at Point 16 and appears to be used to irrigate. Photo by NCRWQCB, 24 October 2024.*



*Fig. 16.2 The surface water diversion line from Point 2 connects to water storage tanks above CAI at Point 16 and appears to be used to irrigate. Photo by NCRWQCB, 24 October 2024.*

No remediation actions recommended by NCRWQCB and no action taken by Permittee.

No remediation photos necessary.

NCRWQCB Violation Point	Humboldt County APN:
17	208-111-028



*Fig. 17.1 Point 17. Water tank located near setback from Class III watercourse.  
Photo by NCRWQCB, 24 October 2024.*

NCRWQCB Violation Point	Humboldt County APN:
17	208-111-028



*Fig. 17.1 Point 17. Water tank located approximately 72ft from Class III watercourse, well outside setback.  
Photo by Permittee, 20 December 2024.*

NCRWQCB Violation Point	Humboldt County APN:
18	208-111-028



*Figs. 18.1-2 Remnant of pool within setback from Class II watercourse at Point 18. Point 18. Top of bank of Class III watercourse. Photos by NCRWQCB, 24 October 2024.*

NCRWQCB Violation Point	Humboldt County APN:
18	208-111-028



*Figs. 18.3 Metal rings in bed of watercourse at Point 18. Photo by NCRWQCB, 24 October 2024.*



NCRWQCB Violation Point	Humboldt County APN:
18	208-111-028



*Fig. 18.4 All violations recorded under Point 18 are beyond Permittee's property line. Pool and metal rings are on property owned by T. Morgan. Photo by Permittee, 20 December 2024.*

NCRWQCB Violation Point	Humboldt County APN:
20	208-111-028



*Fig. 20.1 Trailer on Point 20. Photo by NCRWQCB, 24 October 2024.*



*Fig. 20.2 Trash within inside ditch of road. Photo by NCRWQCB, 24 October 2024.*

All figures represented in Point 20 are located on property not owned by Mana Farms LLC and/or Ms. Kathy Ann Hall. No remediation photos necessary.

**REFUSE/WASTE REMEDIATION – RECOLOGY EEL RIVER, FORTUNA TRANSFER STATION**

***Proof of Refuse Disposal***

**NOTE:** The following receipts represent waste disposal efforts conducted at all properties owned/managed by the Permittee, Michael McEnery, and Henry Le. Associated parcels include APNs 208-112-006, 208-112-007, 208-111-010, 208-111-028, 208-112-032 and 208-112-010. The total cost of this waste/refuse remediation project at all parcels listed above is \$2,222.00.

RECOLOGY EEL RIVER  
 FORTUNA TRANSFER  
 865 Riverwalk Drive  
 Fortuna, CA 95540  
 Customer: 17988/CASH - CUSTOMERS FC

Origin: 11870/Bridgeville

Ticket: 699686  
 Date: 11/30/2024  
 Time: 15:50:01 - 15:40:40  
 INBOUND  
 Gross: 13780 LBS Scale  
 Tare: 12580 LBS Scale  
 Net: 1200 LBS  
 Scale: FR

Materials & Services	Quantity	Rate	Amount
GEND/General Debris	0.60 TON	@ \$320.00	\$192.00

**Recology**  
 WASTE ZERO

Total Amount: \$192.00  
 Cash: \$200.00  
 Change: \$8.00

Signature: Alvaro Del Rio

Printed on recycled paper

RECOLOGY EEL RIVER  
 FORTUNA TRANSFER  
 865 Riverwalk Drive  
 Fortuna, CA 95540

Truck: NOPLATE BLUE PICKUP  
 Customer: 17988/CASH - CUSTOMERS FC

Origin: 11870/Bridgeville

Ticket: 699122  
 Date: 11/28/2024  
 Time: 15:19:58 - 15:13:24  
 INBOUND

Gross: 13960 LBS Scale  
 Tare: 12680 LBS Scale  
 Net: 1280 LBS  
 Scale: FR

Materials & Services	Quantity	Rate	Amount
GEND/General Debris	0.64 TON	@ \$320.00	\$204.80

**Recology**  
 WASTE ZERO

Total Amount: \$204.80  
 Cash: \$205.00  
 Change: \$0.20

Signature: Gabrielle Borges

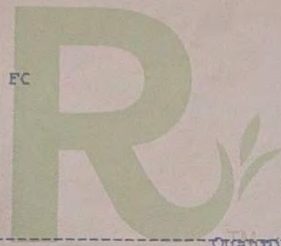
Printed on recycled paper

RECOLOGY ELL RIVER  
FORTUNA TRANSFER  
282 L. HAYDEN DRIVE  
BRIDGEVILLE, OH 45130  
Truck: NOPLATE  
Customer: 17988/CASH - CUSTOMERS FC

Ticket: 701082  
Date: 12/9/2024  
Time: 14:13:26 - 14:17:28  
INBOUND  
Gross: 13660 LBS Scale  
Tare: 12300 LBS Scale  
Net: 1360 LBS  
Scale: FR

Origin: 11870/Bridgeville

Comment: BLUE GMC WITH TRAILER



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Recology<sup>TM</sup>

Total Amount: \$217.60  
Cash \$300.00  
Change: \$82.40

Gabrielle Borges

Signature

WASTE ZERO

0 9/09 Printed on recycled paper

Measurement Standards of the California Department  
of Food and Agriculture .

Eel River Transportation & Salvage  
850 Riverwalk Drive  
Fortuna, CA 95540  
707-725-6530

Customer/Transporter:

Cash Customer  
850 Riverwalk Dr  
Fortuna, Ca 95540

Ticket No: 392613  
Date: 11/11/2024  
Inbound: 1:57 pm  
Outbound: 1:57 pm  
Account 11106300

PO Release No:

Gross	0 lb	NONE
Tare	0 lb	NONE
Adjustments	0	
<hr/> Net	0 lb	
Qty	0.000	

Material	Qty	Unit/\$	Totals
TIRES-IN	13.00	\$5.00	\$65.00
Materials			\$65.00
Taxes/Fees			\$0.00
Total Due			\$65.00

Scale Master Signature :

RECOLOGY EEL RIVER  
FORTUNA TRANSFER  
965 Riverwalk Drive  
Fortuna, CA 95540

Truck: WALKUP  
Customer: 17988/CASH - CUSTOMERS FC

Origin: 15720/Fortuna

Ticket: 697182

Date: 11/11/2024  
Time: 15:25:01 - 15:25:21

INBOUND

Gross: 0 LBS Scale  
Tare: LBS Scale  
Net: LBS  
Scale: FR

Materials & Services	Quantity	Rate	Amount
EWASP/EWASTE DROP OFF PUBLIC	1.00 EA	@ \$2.00	\$2.00

Recology<sup>TM</sup>

WASTE ZERO

Total Amount: \$2.00  
Cash \$2.00

Gabrielle Borges

Signature

WMSTR3-LO 9/09 Printed on recycled paper

RECOLOGY EEL RIVER  
FORTUNA TRANSFER  
965 Riverwalk Drive  
Fortuna, CA 95540

Truck: WALKUP  
Customer: 17988/CASH - CUSTOMERS FC

Origin: 11870/Bridgeville

Ticket: 697148

Date: 11/11/2024  
Time: 13:37:43 - 13:38:05

INBOUND

Gross: 0 LBS Scale  
Tare: LBS Scale  
Net: LBS  
Scale: FR

Materials & Services	Quantity	Rate	Amount
TIREC/Tire - car	9.00 EA	@ \$6.00	\$54.00

Recology<sup>TM</sup>

WASTE ZERO

Total Amount: \$54.00  
Cash \$100.00  
Change: \$46.00

Gabrielle Borges

Signature

MSTR3-LO 9/09 Printed on recycled paper

This is to certify that the following described commodity was weighed, measured, or counted by a weighmaster, whose signature is on this certificate, who is a recognized authority of accuracy, as prescribed by Chapter 7 (commencing with Section 12700) of Division 5 of the California Business and Professions Code, administered by the Division of Measurement Standards of the California Department of Food and Agriculture .

Eel River Transportation & Salvage  
 850 Riverwalk Drive  
 Fortuna, CA 95540  
 707-725-6530

Customer/Transporter: \_\_\_\_\_

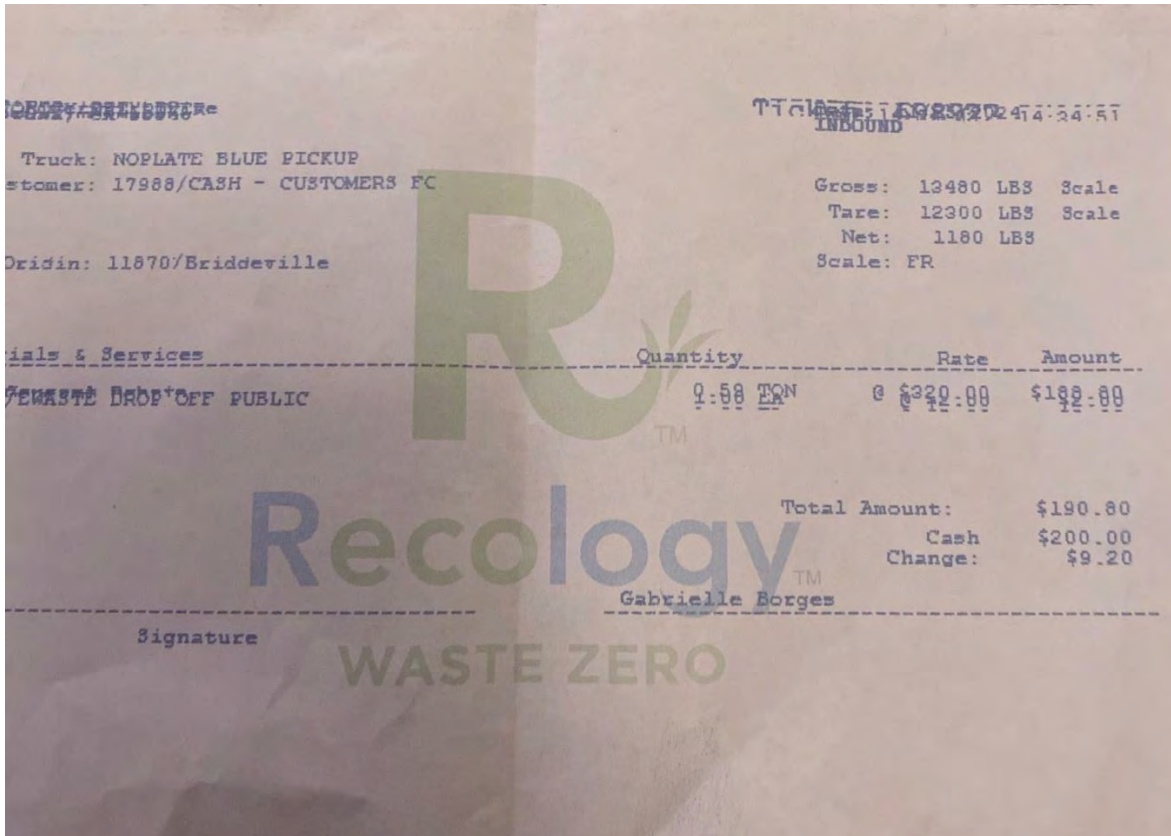
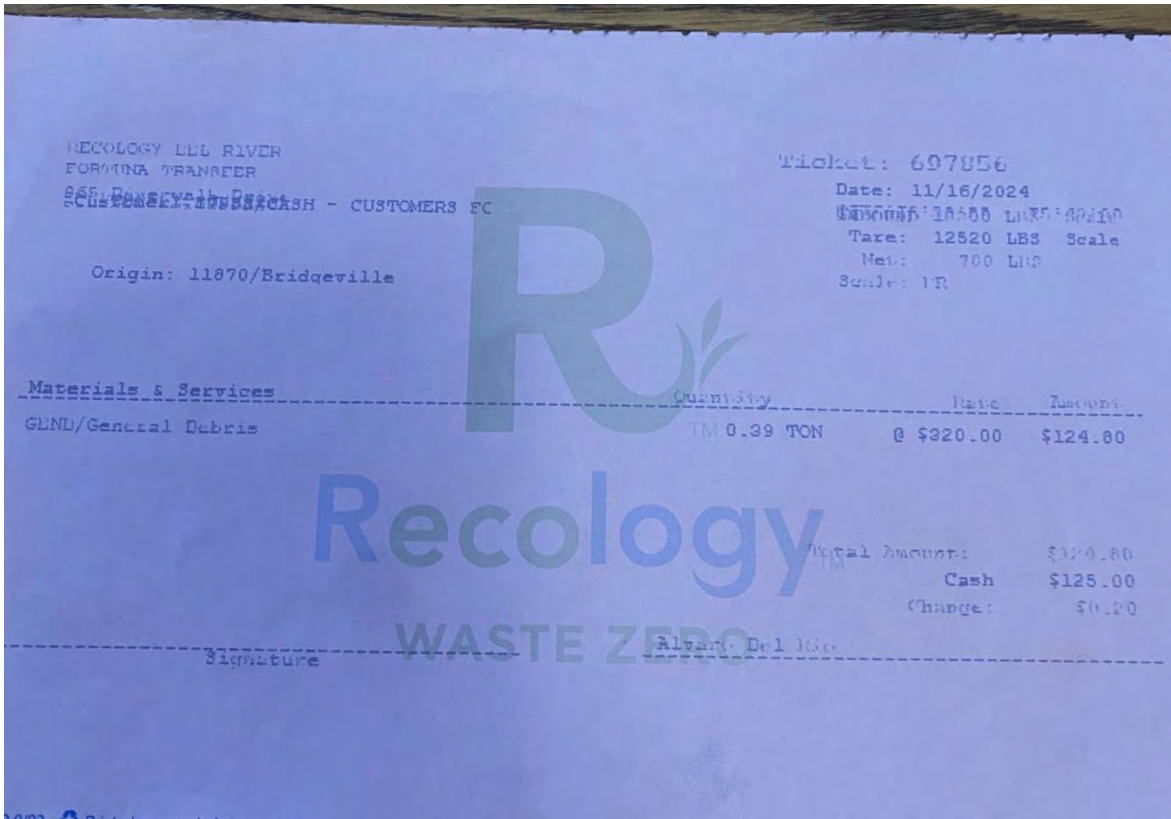
Cash Customer  
 850 Riverwalk Dr  
 Fortuna, Ca 95540

Ticket No: 392822  
 Date: 11/16/2024  
 Inbound: 12:30 pm  
 Outbound: 12:48 pm  
 Account 11106300

PO Release No: \_\_\_\_\_

Gross	13,020 lb	CAPTURED
Tare	9,900 lb	CAPTURED
<u>Adjustments</u>	0	
Net	3,120 lb	
Qty	1.560	

Material	Qty	Unit/\$	Totals
Tires by the Ton	3,120.00	\$400.00	\$624.00
Materials			\$624.00
Taxes/Fees			\$0.00
Total Due			\$624.00





\*\*\*\*\*

Truck: NOPLATE  
Customer: 17988/CASH - CUSTOMERS LC

Ticket: 701190  
Date: 12/28/24  
Time: 14:59:54

Gross: 15080 LBS Scale  
Tare: 12280 LBS Scale  
Net: 2800 LBS  
Scale: FR

Origin: 11870/Bridgeville

Comment: BLUE GMC

Materials & Services

APDN/Ammonia 70 Freon

Quantity	Rate	Amount
1.40 TON	@ \$322.00	\$450.80

Total Amount Cash \$450.80

Signature

Gabrielle Borges

Recology™

WASTE ZERO

RECOLOGY EEL RIVER

\*\*\*\*\*  
Customer: 17988/CASH - CUSTOMERS FC

Ticket: 701190  
Date: 12/28/24  
Time: 14:59:54

Net: 2800 LBS  
Scale: FR

Origin: 11870/Bridgeville

Comment: blue gmc

Materials & Services

GEND/General Debris

Quantity	Rate	Amount
0.48 TON	@ \$320.00	\$153.60

Total Amount Cash \$153.60  
Change: \$0.40

Signature

Gabrielle Borges

Recology™

WASTE ZERO

Fortuna, CA 95540

INBOUND

Truck: NOPLATE BLUE TRUCK  
Customer: 17988/CASH - CUSTOMERS FC

Gross: 14020 LBS Scale  
Tare: 12180 LBS Scale  
Net: 1840 LBS  
Scale: FR

Origin: 11870/Bridgeville



Quantity: 0.92 TON      @ \$328.88      \$299.98

Recology

Total Amount: \$294.40  
Change: \$55.58

Gabrielle Borges

Signature

WASTE ZERO

Printed on recycled paper



ETA Humboldt <etahumboldt@gmail.com>

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**Notice of Violation - Mana Farms LLC - Kathy Hall (APN: 208-111-028; WQ 2023-0102-DWQ; WDID 1\_12CC401264)**

2 messages

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**Mack O'Shaughnessy** <mack@etahumboldt.com>

Fri, Jan 10, 2025 at 1:48 PM

To: "adona.white@waterboards.ca.gov" <adona.white@waterboards.ca.gov>

Cc: ETA Humboldt <etahumboldt@gmail.com>, Kathy Hall <manafarmsllc@gmail.com>, "mikemcenry@gmail.com" <mikemcenry@gmail.com>

Hi Adona,

My name is Mack O'Shaughnessy – I'm a project manager for ETA Humboldt. We met briefly during the CDFW Grant Check-In for Reed Mountain Road. Hope you had a nice holiday season.

Vanessa has asked me to reach out to you regarding a *NOV* letter dated 22 November 2024 at APN 208-111-028 (Permittee Kathy Ann Hall, Mana Farms LLC). Vanessa, Kathy Hall, and Michael McEnry are all cc'd on this email.

We've been representing the permittee through this process and I've prepared a filing for you which documents improvements/remediation work completed by Ms. Hall to date. You'll find a brief cover letter and a photograph log detailing the work completed by Ms. Hall since the 24 October 2024 inspection at the center of this matter.

This is a rather large attachment, so please let me know if you have any issues loading the PDF file.


Thanks so much for your consideration of this filing and have a great weekend!


**Mack O'Shaughnessy**

*Contracting & Procurement*

**ETA Humboldt LLC** | Environmental and Land-Use Consulting

DBE, WBE, SB-Micro/PW, HUBZone, WOSB

 (707) 923-1180

 (707) 382-5564 (direct line)

 [mack@etahumboldt.com](mailto:mack@etahumboldt.com)

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**Kathy Hall - All Violations - Photo Log [Before-After]\_Dec24.pdf**

20850K

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**White, Adona@Waterboards** <Adona.White@waterboards.ca.gov>

Thu, Jan 16, 2025 at 4:20 PM

To: Mack O'Shaughnessy <mack@etahumboldt.com>

Cc: ETA Humboldt <etahumboldt@gmail.com>, Kathy Hall <manafarmsllc@gmail.com>, "mikemcenry@gmail.com" <mikemcenry@gmail.com>

Greetings and happy new year.

Thank you for the efforts and documentation of cleanup on the Property. I have reviewed your attached photos and explanations. The efforts appear adequate to address the features in the interim, especially in

response to inspection recommendations 1-3. Please advise as to the schedule and strategy for addressing the rest of the inspection recommendations, including:

4. Update Cannabis General Order enrollment information with current owner and operator and parcels associated with the cannabis cultivation activities.
5. Update, submit and implement a Site Management Plan (SMP) for the Property, as required by enrollment under the Cannabis General Order.
6. Submit and implement a Site Erosion and Sediment Control Plan as required by the Moderate Risk enrollment under the Cannabis General Order.
7. Submit an application for instream work describing plans to upgrade the stream crossings in conformance with enrollment under Cannabis General Order.

Also, in consulting the Cannabis General Order enrollment records for the property, it appears that as of December 17, 2024, the enrollment has been terminated.

Please advise of plans related to cannabis cultivation activities. If the property is not covered by the Cannabis General Order, additional cleanup will be necessary and cannabis cultivation activities do not have regulatory coverage. If cannabis cultivation activities are to continue on the property, reenrollment will require a new application through the portal.

I am available to meet and discuss any aspect of this property and regulatory situation, and my recommendations. I look forward to additional information about plans moving forward. Thank you. \*A

Adona White, PE  
Water Resource Control Engineer  
North Coast Regional Water Quality Control Board  
[Adona.White@waterboards.ca.gov](mailto:Adona.White@waterboards.ca.gov)  
707-576-2672

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**From:** Mack O'Shaughnessy <[mack@etahumboldt.com](mailto:mack@etahumboldt.com)>  
**Sent:** Friday, January 10, 2025 1:49 PM  
**To:** White, Adona@Waterboards <[Adona.White@waterboards.ca.gov](mailto:Adona.White@waterboards.ca.gov)>  
**Cc:** 'ETA Humboldt' <[etahumboldt@gmail.com](mailto:etahumboldt@gmail.com)>; Kathy Hall <[manafarmsllc@gmail.com](mailto:manafarmsllc@gmail.com)>; [mikemcenry@gmail.com](mailto:mikemcenry@gmail.com)  
**Subject:** Notice of Violation - Mana Farms LLC - Kathy Hall (APN: 208-111-028; WQ 2023-0102-DWQ; WDID 1\_12CC401264)

[Quoted text hidden]

**Caution:** External Email. Use caution when clicking links or opening attachments. When in doubt, contact DIT or use the Phish Alert Button.

# ETA Management Group LLC

77 Avenue of Giants, Unit #4  
Phillipsville, CA 95559  
info@etahumboldt.com | (707) 923-1180



DBE: 51189 | DIR: PW-LR-1000988827 | SB-Micro/PW: 2027799 | CUPC WBE | WOSB

4 November 2024

**TO: County of Humboldt – Planning & Building Department**

3015 H Street  
Eureka CA 95501

**RE: Annual Compliance Inspection Report [RESPONSE]**

Kathy Ann Hall, Mana Farms LLC  
APN 208-111-028, PLN-12280-CUP,

To whom it may concern:

The following submittal serves as a response to alleged issues of non-compliance with the Conditions of Approval agreement between Kathy Ann Hall (“Permittee”) and the County of Humboldt. Ms. Hall recently received a **Notification of Cannabis Permit Suspension** resulting from an Annual Compliance Inspection performed by Inspector Michael Kein on 24 October 2024. In addition to *Summary of Issues* provided in the 31 October 2024 suspension notice, the following letter addresses other alleged non-compliance issues related to County Performance Standards prepared by Inspector Kein.

### ***Summary of Issues and Responses (Notice of Cannabis Permit Suspension)***

- 1. Water Source:** *Approved Water source (well) not in use. Required meter shows only 381 gallons utilized from well. Unauthorized pressure pump, gasoline tank, and piping found in Little Larabee Creek on property and connected to storage tanks for cultivation. This is a direct violation of F&G Code 5650(a) and F&G 1602 (Conditions of Approval Item #11b).*

This section describes data collection errors made by County of Humboldt – Planning and Building department during the 24 October Annual Compliance Inspection, especially regarding compliance with the following Performance Standards: “Water meter(s) installed and records available” and “Water source(s) and use.”

According to the *Annual Compliance Inspection Report* (“ACIR”) prepared by Inspector Michael Kein subsequent the 24 October site inspection at APN 208-111-028-000, the Permittee was found to be non-compliant with *Condition of Approval* No. 5, which reads: “The Applicant shall install and utilize a water meter to keep track of irrigation use. Records from the meter shall be made available to the County upon request.”

Notes associated with this violation indicate that a water meter was properly installed as required on the inspection date. The inspector incorrectly assumes that the Permittee is not using the approved well for cultivation/irrigation based on a gross misreading of the functioning water meter. The water meter installed at the cultivation site is a lead-free bronze alloy Model 120 Recordall, manufactured by Badger Meter, with the following serial number: 63961-011.

According to the ACIR filed by Inspector Kein, the installed water meter “shows only 381 gallons from well” – an error that demonstrates a lack of familiarity with commonly employed regulatory compliance equipment. The error is likely the result of an incorrect assumption that the fixed zeroes (00) on the meter itself represent a decimal fraction of one (1) gallon, despite the apparent lack of decimal point or other written indications to this conclusion.

The Badger Meter Model 120 Recordall is properly read as a whole number for which the rolling “odometer-style” digits indicate accuracy to the nearest 100 gallons. Increased accuracy is determined by adding the figure displayed on the rolling meter to the number indicated by the red needle on a circular face with digits ranging from 0 to 100. From the manufacturer:

The standard register is a straight-reading, permanently sealed magnetic drive register. Dirt, moisture, tampering and lens fogging problems are eliminated. The register has a six-odometer wheel totalization display, 360° test circle with center sweep hand, and flow finder to detect leaks. Register gearing is made of self-lubricating engineered polymer, which minimizes friction and provides long life. The multi-position register simplifies meter installation and reading.

Following this method, the meter with serial number 63961-011 clearly indicates that the well has produced 38,146 gallons of permitted irrigation water since installation (*Figure 1*). This figure is exactly 100 times the reading made by County of Humboldt during the 24 October Compliance Inspection and indicates a reasonable amount of water collection from the permitted well to demonstrate compliant use.

Furthermore, the Permittee’s standard practice for collecting water from the permitted well requires her physical presence onsite to monitor the process. Because Ms. Hall was not present at the site during the 24 October 2024 Annual Compliance Inspection, it is reasonable to conclude that the well was not in use during the inspection.

All diversion infrastructure in and near Little Larabee Creek was removed by resource protection agents during the 24 October 2024 compliance inspection.

Please refer to the attached photographs and manufacturer's documentation for the Badger Meter Model 120 Recordall (ATTACHMENT A).

**2. Unapproved Development or Structures:** *Drying structures and locations of greenhouses not represented on Site Plan.*

When Kathy Ann Hall purchased APN 208-111-008 in August 2022, the site’s cultivation area included one (1) large greenhouse on the upper flat. The Permittee adjusted the site to three (3) smaller greenhouses with an aggregate canopy square footage totaling less than the original large structure. Permittee has stated that the purpose of this adjustment was to remedy significant structural damage



sustained during inclement weather during the previous year with smaller, cheaper, and easier to maintain greenhouse structures.

My firm, ETA Management Group LLC, represents the Permittee in matters of compliance with applicable State and County regulations regarding cannabis cultivation. We have discussed with Ms. Hall that updated site maps must be submitted to all appropriate agencies; Ms. Hall has ordered this work and updated site maps for Manna Farms LLC are currently in queue.

I respectfully request patience and understanding from the Planning and Building Department on behalf of the Permittee. As I am sure you are aware, our area has recently seen a dramatic decline in the availability of professional consulting services capable of performing this type of work. With apparent increases in regulatory oversight at both County and State levels, my firm is working hard to prioritize time-sensitive work while simultaneously maintaining vigilance toward our clients' ever-declining budgets for compliance paperwork.

Permittee agrees to submit a rudimentary site map to your department no later than Tuesday 5 November 2024. ETA Management Group agrees to expedite a new official site map that meets all County requirements. My firm estimates completion/submittal of an updated site plan which clearly identifies all spaces and co-uses by 21 November 2024.

**3. Building Permits:** *Required permits have not been secured from Building Department as per Conditions of Approval (1a).*

According to a separate *Annual Compliance Inspection Report* (“ACIR”) prepared by Inspector Collin Slavey on 9 August 2024, **Permittee’s deadline for completing Conditions of Approval is listed as October 2025** (ATTACHMENT B). Permittee plans to submit application and payment for ag-exempt building structures ahead of schedule in light of the second ACIR filed for the Permittee in 2024, prepared by Inspector Michael Kein and dated 24 October 2024.

To reiterate, Ms. Hall maintains written confirmation from County of Humboldt – Planning and Building Department that the deadline for completing Conditions of Approval is not until October 2025.

**4. Conditions of Approval:** *Items #1, 2, 5, 6, 12, and 15 have not been completed.*

As of the date of this letter, Permittee has completed the majority of these listed Conditions of Approval. The remaining Conditions are on track for completion before October of next year, in accordance with written confirmation of the October 2025 completion deadline.

Responses to individual potential issues of non-compliance with Conditions of Approval listed in the 24 October 2024 ACIR can be found beginning on p. 5 of this response letter.

**5. Streambed Alteration Agreement (1602):** *Under former permit holder and needs to be updated per Ongoing Condition 11b.*

**LSAA Notification No. EPIMS-HUM-04338-R1C** was officially transferred by original applicant Brandon Rivas to current Permittee Kathy Ann Hall on 15 November 2023 (ATTACHMENT C).

6. ***Refuse, Waste, Oil, and Trellis Net:*** *All cannabis related waste and unpermitted items to be disposed of properly at approved facilities. (Ongoing Conditions 23b).*

All cannabis-related waste, including monofilament netting, has been removed from the cultivation site and disposed of properly. Photographic evidence (before-and-after) of the Permittee's cleanup efforts is included in this letter.

To the best of my knowledge, the only BMPs which currently exist for preventing wildlife entrapment as a result of monofilament netting use were prepared by my firm in 2024. Please notify me should BMPs prepared by County of Humboldt and/or appropriate resource protection agencies currently exist.

***Other Non-Compliance Issues (County of Humboldt Performance Standards)***

Please note that responses to duplicate violation/non-compliance points filed by County of Humboldt have been consolidated to avoid unnecessary redundancy.

1. ***No handwashing stations or restrooms (portable toilets) on site. Unless no employees are utilized and the operator has a function, approved septic system available on an adjustment parcel, these items are necessary.***

Mana Farms LLC does not employ any workers outside of Permittee Kathy Ann Hall. Ms. Hall maintains a nearby residence (less than five (5) minute drive from the cultivation site) with adequate plumbing for her personal needs. Despite the fact that Mana Farms LLC utilizes no employees, the site does include adequate handwashing and domestic facilities (ATTACHMENT D). For this reason, ETA Management Group filed a *Statement of Use* application with SWRCB as well as a LSAA amendment with CDFW for domestic use rights to Little Larabee Cree on 1 November 2024.

To reiterate, Mana Farms LLC utilizes NO employees and is therefore exempt from this County Performance Standard.

2. ***Several Conditions of Approval Outstanding and/or Not on File***

To reiterate, the Permittee possesses written confirmation from County of Humboldt that the **completion deadline for Conditions of Approval is October 2025**. However, each of the cited Conditions of Approval are addressed in this section.

**Condition 1: The Applicant shall secure permits for all structures related to the cannabis cultivation and other commercial cannabis activity. A letter or similar communication from the Building Division verifying that all structures related to the cannabis cultivation are permitted will satisfy this condition.**

Permittee intends to promptly submit ag-exempt building applications and payments for greenhouses and two (2) buildings, nearly one (1) year ahead of confirmed deadline for meeting Conditions of Approval. Expected submittal date is 5 November 2024.

**Condition 2: The Applicant shall provide a survey of the property by a California licensed surveyor to verify that the requisite 30-foot cannabis cultivation setback and all zoning setbacks are Satisfied.**

This Condition of Approval is based on a large greenhouse structure that no longer exists. As stated above, the Permittee removed this structure and replaced it with three (3) smaller structures. All new greenhouse structures are over 100 feet from the property line.

**Condition 5: The Applicant shall install and utilize a water meter to keep track of irrigation use. Records from the meter shall be made available to the County upon request.**

Permittee has installed and currently utilizes an approved lead-free water meter to keep track of irrigation use. Please refer to p. 2 of this letter for more information. Records from the meter into storage and from storage for use at cultivation site have been provided by Permittee and are attached (ATTACHMENT E).

**Condition 6: The Applicant shall have the solar arrays inspected for proper installation by a qualified professional. The inspection report shall be submitted to the Planning Department for review and approval.**

A professional inspection of the solar panels installed at APN 208-111-028 has been scheduled with local solar expert Greenwired. Permittee expects to have inspection report ready for submittal to Planning Department by 31 December 2024, although the completion deadline for this and all Conditions of Approval remains October 2025.

**Condition 11: Comply with the terms of any applicable Streambed Alteration (1600) Permit obtained from the California Department of Fish & Wildlife. NOTE - LSAA 1602 is under former permit holder. Current permit holder / owner must renew LSAA in their name and complete all Requirements.**

LSAA Notification No. EPIMS-HUM-04338-R1C was officially transferred by original applicant Brandon Rivas to current Permittee Kathy Ann Hall on 15 November 2023 (ATTACHMENT C).

**Condition 12: The applicant shall secure permits for all existing and proposed grading (including, but not limited to flats and pond) and structures (including, but not limited to the cabin, shop and 5 cargo containers) related to the cannabis cultivation and other commercial cannabis activity. A letter or similar communication from the Building Division verifying that all structures and grading related to cannabis cultivation is permitted will satisfy this condition. No impervious floor shall be allowed for greenhouses.**

As previously stated, County of Humboldt has specified (in writing) an October 2025 deadline for the Permittee's Conditions of Approval. Moreover, the structures listed in the non-compliance notes prepared by Inspector Kein do not exist at APN 208-111-028. The following structures currently located at the cultivation site are typically considered ag-exempt: plastic (PVC) framed greenhouses, drying shed, one (1) small pesticide/nutrient storage shed, and one (1) additional agricultural storage shed. No impervious floors are known to be used in any of the Permittee's greenhouses.

Ag-exempt permit applications and payments for these structures will be promptly filed by the Permittee, despite the fact that the Permittee possesses written confirmation from the County of Humboldt of an October 2025 Conditions of Approval deadline.

**Condition 15b: The groundwater well shall be inspected annually to evaluate drawdown, and the potential for the well to go dry. This evaluation should include a standard pump test to be conducted during the dry season. Evaluation of the pump test results should be conducted by a licensed professional with expertise. Should the results of the drawdown testing indicate the potential for the well to go dry or any other confounding factors regarding proximal wells, the County may require the Applicant to install additional water storage to mitigate excessive drawdown.**

Permittee possesses written documentation of a County-approved Conditions of Approval deadline of October 2025. Permittee fully intends to comply with this and all other Conditions of Approval but is not obligated to demonstrate full compliance with Condition 15b (or any other Condition of Approval) until the stated deadline.

Moreover, the 15 November 2024 recommendation presented by County of Humboldt Planning and Building Department is unreasonable given the current small business climate in Humboldt County. Permittee agrees to make every reasonable effort to produce a professional drawdown evaluation report during the dry season of 2025, which is well inside the stated Conditions of Approval deadline.

**Condition 23a: All refuse shall be contained in wildlife proof containers, at all times, and relocated to an authorized waste management facility, in compliance with State and local laws, on a regular and on-going basis.**

Permittee agrees to construct a containment fence by 15 November 2024 and to make all reasonable efforts to clean up cultivation waste before October 2025 Conditions of Approval deadline.

Photographs which document the containment fence installation shall be submitted to County of Humboldt Planning and Building Department no later than 15 November 2024.

- Power source(s): Solar to be main power source for cultivation. Several generators found on site. One of which was running at time of inspection for drying area in Cultivation Area #1. Generators to be used as backup only.**

Generators on site are used as backup only. Permittee maintains several backup generators onsite for ease of operation (large site operated by one woman, to avoid moving heavy generators over rough terrain) in the event backup electricity is needed.

4. ***Soil management, compost, plant waste, refuse:*** Spent soil found spread outside cultivation areas. Refuse found on property in untied soil bags and not disposed of properly. This included used nutrient and oil containers, as well as used oil filters. Also remove all inoperable fans, lights, etc. and dispose at the proper approved facilities.

Areas have been cleaned up, including refuse disposal. Please see attached photos.





5. **Water source(s):** Well not in use. Meter shows only 381 gallons utilized from well.

Please refer to response to *Summary of Issues Response* (p. 2) and response to Condition 5 (p. 5). Logs have been provided by Permittee and are attached (ATTACHMENT E).

6. **Water source(s):** Pressure pump and piping found in Little Larabee Creek on property and connected to storage tanks for cultivation. Little Larabee Creek is not an approved water source for cannabis cultivation. Remedy: Pump to be removed for [*sic*]creek immediately. Waterlogs required to be presented to NCWQCB and Humboldt County Planning on a yearly basis as per Conditions of Approval Items #4 and #8.

All diversion infrastructure at Little Larabee Creek has been removed. All Conditions of Approval items shall be satisfied by October 2025. Statement of Use and LSAA Amendment filed by ETA Management Group on behalf of Permittee (1 November 2024).

**ATTACHMENT A: INSTALLED WATER METER**



*Figure 1: Water meter on permitted well diversion clearly indicating 38,146 gallons.  
Model 120 measures 100,000,000 gallons.*

**BEGIN ATTACHMENT B: ANNUAL COMPLIANCE INSPECTION REPORT (8/9/204)**





HUMBOLDT COUNTY  
PLANNING AND BUILDING DEPARTMENT  
3015 H STREET, EUREKA, CA 95501 - PHONE (707) 445-7245

PLANNING PROJECT

ANNUAL COMPLIANCE INSPECTION REPORT

APPLICANT AND AGENT INFORMATION

**Applicant:**  
**Applicant Address:** KATHY HALL, 540 2ND AVENUE  
RIO DELL, CA 95562  
**Agent:**  
**Agent Address:** PHILLIPSVILLE, CA 95559

PROJECT INFORMATION

**Project Number:** PLN-12280-CUP  
**Primary Parcel Number:** 208-111-028-000  
**Inspection Date:** 08/09/2024  
**Inspection Type:** Annual Compliance Inspection  
**Inspector Name:** Collin Slavey  
**Inspector Email:** cslavey@co.humboldt.ca.us  
**Cannabis:** Y

PERFORMANCE STANDARDS

Performance Standard	Compliance	Notes	Deadline
DCC Grant Recipient	No		
Billing Fee Status	COMPLIANT		
Completed necessary conditions prior to operating	COMPLIANT		
Cultivation amount	COMPLIANT		
Cultivation in approved location(s)	COMPLIANT	Need to apply for building permits.	
Cultivation type and schedule	COMPLIANT		
Development/structures in approved locations	COMPLIANT		
Drainage, runoff, and erosion control	COMPLIANT		
Employees, housing, bathrooms, handwashing stations	COMPLIANT		
Light pollution prevention	COMPLIANT		
Monofilament netting	COMPLIANT	Be sure to clean up waste netting.	
Noise (dB)	COMPLIANT		
Operation is achieving compliance schedule	COMPLIANT	Deadline October 2025. Please review all items on the Compliance Agreement. Let me know if you want a copy of the document. Email me at cslavey@co.humboldt.ca.us.	
Operation is meeting ongoing conditions	COMPLIANT		
Potentially hazardous materials storage (e.g. fuel and fertilizers)	COMPLIANT		
Power source(s)	COMPLIANT		
Processing in approved location(s)	COMPLIANT		
Security plan implementation	COMPLIANT		

Visit the Accela Citizen Access portal to view record data online:

<https://aca-prod.accela.com/HUMBOLDT/Cap/CapDetail.aspx?Module=Planning&TabName=Planning&capID1=16HUM&capID2=00000&capID3=011KY&agencyCode=HUMBOLDT>



HUMBOLDT COUNTY  
PLANNING AND BUILDING DEPARTMENT  
3015 H STREET, EUREKA, CA 95501 - PHONE (707) 445-7245

PLANNING PROJECT

ANNUAL COMPLIANCE INSPECTION REPORT

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PERFORMANCE STANDARDS

Performance Standard	Compliance	Notes	Deadline
Soil management, compost, plant waste, refuse	COMPLIANT		
State license(s)	COMPLIANT		
Uses consistent with site plan and operations plan	COMPLIANT		
Water meter(s) installed and records available	COMPLIANT	Please be sure to record water use per month.	
Water source(s) and use	COMPLIANT		
Water storage	COMPLIANT		

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Visit the Accela Citizen Access portal to view record data online:

<https://aca-prod.accela.com/HUMBOLDT/Cap/CapDetail.aspx?Module=Planning&TabName=Planning&capID1=16HUM&capID2=00000&capID3=011KY&agencyCode=HUMBOLDT>

**END ATTACHMENT B: ANNUAL COMPLIANCE INSPECTION REPORT (8/9/204)**

**BEGIN ATTACHMENT C: OFFICIAL TRANSFER, LSAA NOTIFICATION**



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
Habitat Conservation and Planning  
619 Second Street  
Eureka, CA 95501  
R1LSAEureka@wildlife.ca.gov  
(707) 441-2075  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



November 15, 2023

Brandon Rivas  
Rockaway Investments LLC  
P.O. Box 130  
Rio Dell, CA 95562  
[etahumboldtrivas@gmail.com](mailto:etahumboldtrivas@gmail.com)

**TRANSFER OF LAKE OR STREAMBED ALTERATION AGREEMENT  
NOTIFICATION NO., EPIMS-HUM-04338-R1C; APN: 208-111-028**

Dear Brandon Rivas:

On October 11, 2023, the California Department of Fish and Wildlife (CDFW) received your request to amend the above referenced Lake or Streambed Alteration Agreement (Agreement) and the required fee in the amount of \$525 for a minor amendment. Your request to amend the Agreement included a transfer of the Agreement from Brandon Rivas (Transferor), the current permittee under the Agreement, to Kathy Hall (Transferee).

CDFW, Transferor, and Transferee hereby agree to the following:

1. The Agreement is hereby transferred from Transferor to Transferee, thereby making Transferee the new Permittee under the Agreement.
2. Transferee shall be solely responsible for complying with all terms and conditions in the Agreement; including, but not limited to, any terms and conditions for which Transferor was previously responsible as the former Permittee under the Agreement.
3. This Agreement shall take effect on the last date of signature.

Copies of the Agreement and this amendment must be readily available at project work sites and must be presented when requested by a CDFW representative or agency with inspection authority.

If you have any questions regarding this letter, please contact Ryan Aberg, Environmental Scientist by email at [Ryan.Aberg@wildlife.ca.gov](mailto:Ryan.Aberg@wildlife.ca.gov).

Brandon Rivas  
EPIMS-HUM-04338-R1C  
11/13/2023

Sincerely,

DocuSigned by:  
**David Manthorne**  
1B5E42F730224D2...

David Manthorne, Senior Environmental Scientist Supervisor

ec: California Department of Fish and Wildlife  
Ryan Aberg, Environmental Scientist  
Region 1- Coastal  
[Ryan.Aberg@wildlife.ca.gov](mailto:Ryan.Aberg@wildlife.ca.gov)

**END ATTACHMENT C: OFFICIAL TRANSFER, LSAA NOTIFICATION**

**BEGIN ATTACHMENT D: UPDATED SITE MAP**



# PARCEL OVERVIEW

APN: 208-111-028

## CULTIVATION INFORMATION

### CULTIVATION AREA

CA #1 = 1,000 SQ FT  
 CA #2 = 200 FT<sup>2</sup>  
 GH #1 = 840 SQ FT  
 GH #2 = 1,000 SQ FT  
 GH #3 = 2,000 SQ FT  
 GH #4 = 1,020 SQ FT  
 GH #5 = 2,304 SQ FT  
 GH #6 = 2,304 SQ FT

TOTAL EXISTING OUTDOOR CULTIVATION AREA = 1200 SQ FT  
 TOTAL EXISTING GREENHOUSES 9,468 SQ FT

### DECOMMISSIONED AREA

CA #3 = 2,923 FT<sup>2</sup>

**MANA FARMS LLC**  
**Kathy Hall**  
**PLN 12280**  
**208-111-028**

**NOVEMBER 1, 2024**

## CULTIVATION BUILDINGS AND USE

BUILDING	USE	SIZE	YEAR
NUTRIENT SHED	NUTRIENT / FUEL STORAGE	12' X 32'	2016
DRY SHED	DRYING/CURING	34' x 16'	2016

## WATER STORAGE & USE

TYPE	NUMBER	SIZE	DATE OF INSTALLATION
HDPE TANKS	2	5,000 GALLONS	2015
HDPE TANKS	1	3,000 GALLONS	2015
HDPE TANKS	1	800 GALLONS	2015
HDPE TANKS	1	1,100 GALLONS	2015
HDPE TANKS	2	2,500 GALLONS	2015

TOTAL AMOUNT OF WATER STORAGE = 19,900 GALLONS

### WATERSOURCE

UNNAMED STREAM  
 WELL

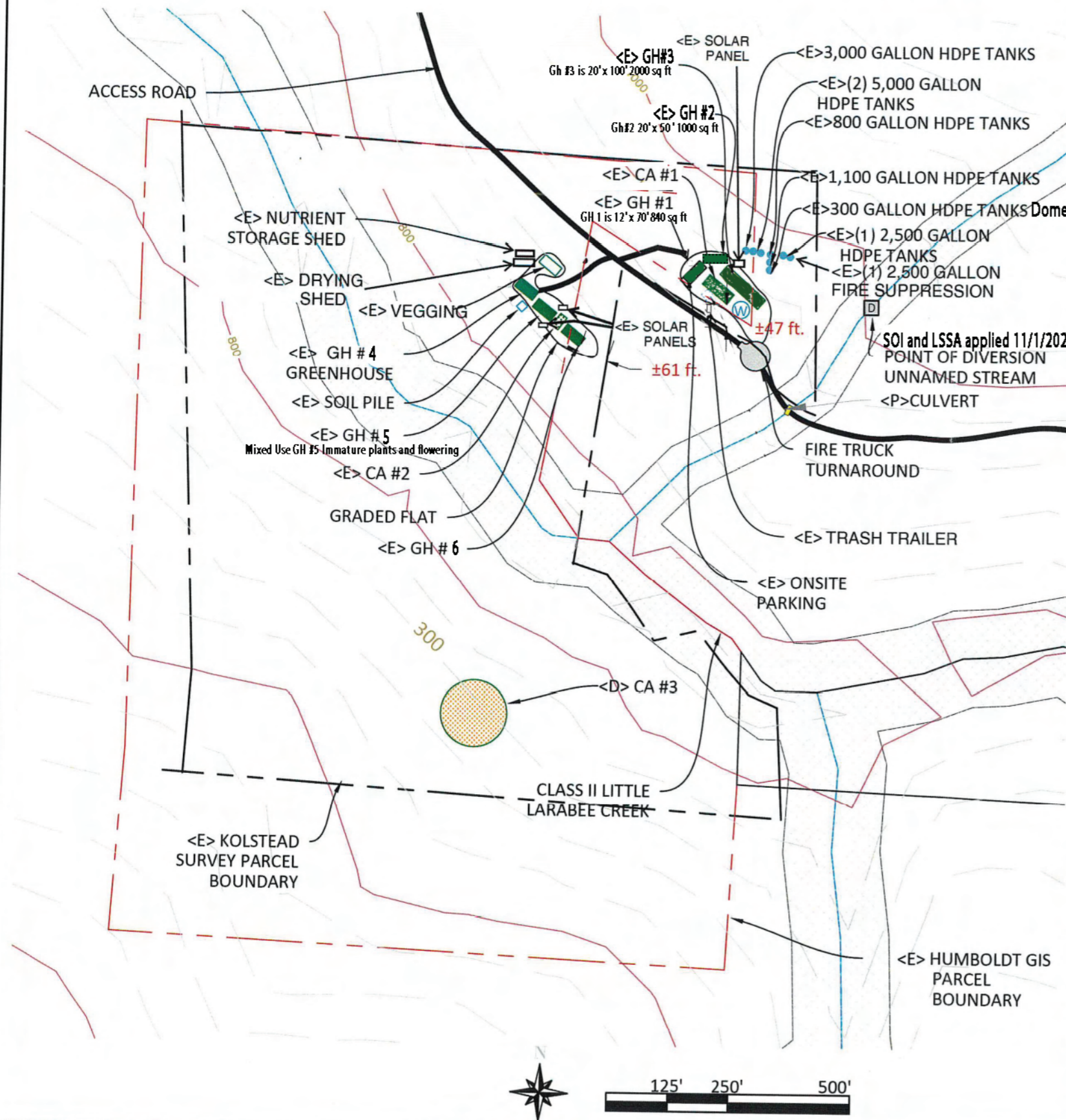
### POWERSOURCE

45 KW WHISPER GENERATOR  
 5 KW HONDA GENERATOR (BACKUP)  
 2 KW HONDA GENERATOR (BACKUP)  
 3 SOLAR PANELS

### SURROUNDING BUILDINGS

THERE ARE NO SCHOOLS, BUS STOPS, PLACES OF WORSHIP, PUBLIC PARKS OR TRIBAL CULTURAL RESOURCES WITHIN 600 FEET OF THE CULTIVATION SITE  
 THERE ARE NO OFF SITE RESIDENCES WITHIN 300 FEET OF THE CULTIVATION SITE.

CLASS II LITTLE LARABEE CREEK WITH REQUIRED 100 FT BUFFER.



**END ATTACHMENT D: UPDATED SITE MAP**

**ATTACHMENT E: WATER STORAGE AND USAGE LOGS (PERMITTEE)**

Water

August 2023	523
Sept.	2,204

The image shows a piece of lined paper with handwritten text. At the top, the word "Water" is written. Below it, there are two entries: "August 2023" followed by "523", and "Sept." followed by "2,204".

*Figure 2: Water usage logs, 2023. Collected and submitted by Permittee.*

Water logs/tanks storage

May 2024	3,912
June	8,082
July	10,802
August	12,625
September	6,493

The image shows a piece of lined paper with handwritten text. At the top, the phrase "Water logs/tanks storage" is written. Below it, there are five entries: "May 2024" followed by "3,912", "June" followed by "8,082", "July" followed by "10,802", "August" followed by "12,625", and "September" followed by "6,493".

*Figure 3: Water storage logs, 2024. Collected and submitted by Permittee.*



HUMBOLDT COUNTY  
PLANNING AND BUILDING DEPARTMENT  
3015 H STREET, EUREKA, CA 95501 - PHONE (707) 445-7245

PLANNING PROJECT

ANNUAL COMPLIANCE INSPECTION REPORT

APPLICANT AND AGENT INFORMATION

**Applicant:**  
**Applicant Address:** KATHY HALL, 540 2ND AVENUE  
RIO DELL, CA 95562  
**Agent:**  
**Agent Address:** PHILLIPSVILLE, CA 95559

PROJECT INFORMATION

**Project Number:** PLN-12280-CUP  
**Primary Parcel Number:** 208-111-028-000  
**Inspection Date:** 08/09/2024  
**Inspection Type:** Annual Compliance Inspection  
**Inspector Name:** Collin Slavey  
**Inspector Email:** cslavey@co.humboldt.ca.us  
**Cannabis:** Y

PERFORMANCE STANDARDS

Performance Standard	Compliance	Notes	Deadline
DCC Grant Recipient	No		
Billing Fee Status	COMPLIANT		
Completed necessary conditions prior to operating	COMPLIANT		
Cultivation amount	COMPLIANT		
Cultivation in approved location(s)	COMPLIANT	Need to apply for building permits.	
Cultivation type and schedule	COMPLIANT		
Development/structures in approved locations	COMPLIANT		
Drainage, runoff, and erosion control	COMPLIANT		
Employees, housing, bathrooms, handwashing stations	COMPLIANT		
Light pollution prevention	COMPLIANT		
Monofilament netting	COMPLIANT	Be sure to clean up waste netting.	
Noise (dB)	COMPLIANT		
Operation is achieving compliance schedule	COMPLIANT	Deadline October 2025. Please review all items on the Compliance Agreement. Let me know if you want a copy of the document. Email me at cslavey@co.humboldt.ca.us.	
Operation is meeting ongoing conditions	COMPLIANT		
Potentially hazardous materials storage (e.g. fuel and fertilizers)	COMPLIANT		
Power source(s)	COMPLIANT		
Processing in approved location(s)	COMPLIANT		
Security plan implementation	COMPLIANT		

Visit the Accela Citizen Access portal to view record data online:

<https://aca-prod.accela.com/HUMBOLDT/Cap/CapDetail.aspx?Module=Planning&TabName=Planning&capID1=16HUM&capID2=00000&capID3=011KY&agencyCode=HUMBOLDT>



HUMBOLDT COUNTY  
PLANNING AND BUILDING DEPARTMENT  
3015 H STREET, EUREKA, CA 95501 - PHONE (707) 445-7245

PLANNING PROJECT

ANNUAL COMPLIANCE INSPECTION REPORT

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PERFORMANCE STANDARDS

Performance Standard	Compliance	Notes	Deadline
Soil management, compost, plant waste, refuse	COMPLIANT		
State license(s)	COMPLIANT		
Uses consistent with site plan and operations plan	COMPLIANT		
Water meter(s) installed and records available	COMPLIANT	Please be sure to record water use per month.	
Water source(s) and use	COMPLIANT		
Water storage	COMPLIANT		

---

Visit the Accela Citizen Access portal to view record data online:

<https://aca-prod.accela.com/HUMBOLDT/Cap/CapDetail.aspx?Module=Planning&TabName=Planning&capID1=16HUM&capID2=00000&capID3=011KY&agencyCode=HUMBOLDT>



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
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619 Second Street  
Eureka, CA 95501  
R1LSAEureka@wildlife.ca.gov  
(707) 441-2075  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



November 15, 2023

Brandon Rivas  
Rockaway Investments LLC  
P.O. Box 130  
Rio Dell, CA 95562  
[etahumboldtrivas@gmail.com](mailto:etahumboldtrivas@gmail.com)

**TRANSFER OF LAKE OR STREAMBED ALTERATION AGREEMENT  
NOTIFICATION NO., EPIMS-HUM-04338-R1C; APN: 208-111-028**

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CDFW, Transferor, and Transferee hereby agree to the following:

1. The Agreement is hereby transferred from Transferor to Transferee, thereby making Transferee the new Permittee under the Agreement.
2. Transferee shall be solely responsible for complying with all terms and conditions in the Agreement; including, but not limited to, any terms and conditions for which Transferor was previously responsible as the former Permittee under the Agreement.
3. This Agreement shall take effect on the last date of signature.

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If you have any questions regarding this letter, please contact Ryan Aberg, Environmental Scientist by email at [Ryan.Aberg@wildlife.ca.gov](mailto:Ryan.Aberg@wildlife.ca.gov).

Brandon Rivas  
EPIMS-HUM-04338-R1C  
11/13/2023

Sincerely,

DocuSigned by:  
**David Manthorne**  
1B5E42F730224D2...

David Manthorne, Senior Environmental Scientist Supervisor

ec: California Department of Fish and Wildlife  
Ryan Aberg, Environmental Scientist  
Region 1- Coastal  
[Ryan.Aberg@wildlife.ca.gov](mailto:Ryan.Aberg@wildlife.ca.gov)



GAVIN NEWSOM  
GOVERNOR



JARED BLUMENFELD  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

## State Water Resources Control Board

Cannabis General Order Application Number: 459336

Fee Payment Application Number: BA10459336

Self-Certification Date: 01/28/2025

# NOTICE OF RECEIPT

## STATE WATER RESOURCES CONTROL BOARD

### GENERAL WASTE DISCHARGE REQUIREMENTS AND WAIVER OF WASTE DISCHARGE REQUIREMENTS FOR DISCHARGES OF WASTE ASSOCIATED WITH CANNABIS CULTIVATION ACTIVITIES

Your application for coverage under the Cannabis General Order has been received.

## California Department of Cannabis Control License

For dischargers seeking a cultivation license from California Department of Cannabis Control, this Notice of Receipt is insufficient. Upon payment of your application fee (see Fee Payment section) and submittal of Native American tribal authorization (if needed; see Native American Tribe Authorization section below), you will receive a separate Notice of Applicability (NOA) to be used for obtaining a California Department of Cannabis Control license.

## Fee Payment

**Within 30 calendar days of submitting your application, you must pay an application fee in order for your application to be complete.**

Your fee category is: **Tier 1 Low Risk with less than 1 acre of disturbed area. Your application fee is \$804 .00**

Fee	Per Acre Surcharge*	Disturbed Acres	Charge
Tier 1 Low Risk			\$ 804.00
2-50 Acres	\$216	0	\$ 0.00
51-100 Acres	\$116	0	\$ 0.00
101+ Acres	\$58	0	\$ 0.00
<b>Total:</b>			<b>\$ 804 .00</b>

\*Maximum surcharge fee is \$24,023

Fee's are reassessed on a yearly basis based on program revenue, expenses, and stakeholder input. You can review the current Water Boards Fee Schedule and stakeholder announcements by visiting the following website: <https://www.waterboards.ca.gov/resources/fees/> (<https://www.waterboards.ca.gov/resources/fees/>).

The application fee can be paid using electronic funds transfer, a credit card, a check, money order, or cashier check.

- If you are paying via electronic funds transfer or credit card, visit the following website: [http://www.waterboards.ca.gov/make\\_a\\_payment/](http://www.waterboards.ca.gov/make_a_payment/) ([http://www.waterboards.ca.gov/make\\_a\\_payment/](http://www.waterboards.ca.gov/make_a_payment/)). Include your Fee Payment Application Number when submitting your payment. Your Fee Payment Application Number can be found at the top right-hand corner of this Notice.
- If you are paying with a check, money order, or cashier check, make the check payable to the "State Water Resources Control Board", write the Fee Payment Application Number on the check, money order, or cashier check, and submit the payment to the following address:



State Water Resources Control Board  
ATTN: Water Quality Fees - Cannabis General Order  
PO Box 1888  
Sacramento, CA 95812-1888.

Instructions for Paying Application Fees by Cash:

All cash payments must be submitted directly to the State Water Resources Control Board (State Water Board), not the Regional Water Quality Control Board. The State Water Board is able to accept cash payments at its downtown Sacramento location. Cash payments, however, will require additional time and an appointment with the State Water Board Sacramento office. A delay in enrollment due to the need for a cash payment is not an excuse for non-compliance with applicable enrollment requirements. To schedule an appointment to make a cash payment, please call (916) 341-5021.

## **Technical Reports**

In accordance with the Cannabis General Order, **you may have one or more technical reports due**. Below is the list of technical reports due based on your site conditions.

All technical reports shall be submitted electronically through the Water Boards Cannabis Cultivation Programs Portal survey General Order Technical Report (<https://public2.waterboards.ca.gov/MT/TakeSurvey/Start?surveyId=1087>). When completing this survey you will need to reference your Cannabis Cultivation General Order Application Number which can be found on the top-right hand corner of this Notice. Refer to the Cannabis General Order for additional information regarding content of these technical reports.

Based on the information you provided, your site conditions are: Tier 1 Low Risk with a cultivation area less than or equal to 1 acre and a slope less than or equal to 30 percent.

List of Technical Reports Due:

1) Site Management Plan - **due within 90 days of application submittal**

## **Compliance with Best Practicable Treatment or Control (BPTC) Measures**

You have certified that your site qualifies as a Tier 1 Low Risk site and that you will complete improvements to achieve compliance by the onset of the winter period following submittal of this application. Winter period is defined in Attachment A of the Cannabis General Order.

## **Native American Tribe Authorization**

This section does not apply to you.

For additional information regarding your application, please contact the North Coast Regional Water Board office. Current contact information for the North Coast Regional Water Board office:

5550 Skylane Blvd, Suite A  
Santa Rosa, CA 95403  
(707) 576-2220

[northcoast.cannabis@waterboards.ca.gov](mailto:northcoast.cannabis@waterboards.ca.gov) (<mailto:northcoast.cannabis@waterboards.ca.gov>)

If you notice any errors in your application, please contact the North Coast Regional Water Board office for more information on providing the correct information. **Do not resubmit your application or begin a new application for the purposes of correcting errors, unless you are instructed to do so by the State Water Board or Regional Water Board.**

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

---

1001 I Street, Sacramento, CA 95814 | Mailing Address: P.O. Box 100, Sacramento, CA 95812-0100 | [www.waterboards.ca.gov](http://www.waterboards.ca.gov)





State of California – Natural Resources Agency  
 DEPARTMENT OF FISH AND WILDLIFE  
 Region 1 - Northern  
 619 2nd Street  
 Eureka, California 95501  
 (707) 445-6493  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



December 13, 2024

Kathy Hall  
 Rockaway Investments, LLC  
 504 2nd Avenue  
 Rio Dell, CA 95562

**INCOMPLETE REQUEST TO AMEND LAKE OR STREAMBED ALTERATION NO., EPIMS-HUM-04338-R1C, HUMBOLDT COUNTY APN: 208-111-028**

Dear Kathy Hall,

On November 6, 2024, the California Department of Fish and Wildlife (CDFW) received your Amendment request for a Lake or Streambed Alteration (Notification). On December 12, 2024, CDFW determined that your Amendment request is incomplete because the information on one or more of the sections below is either missing or insufficient. To complete your Amendment request, please review the Environmental Permit Information Management System (EPIMS) Permitting Portal instructions available in the [EPIMS Help Menu](#) and provide the necessary information and resubmit your Amendment request.

- Amendment Type
- Amendment Description
- Payment Information

To complete the Amendment, please complete the following:

- Change the amendment type to “Major” and pay the appropriate fee. In this instance, you may pay the difference between the Minor and Major fee (see: <https://wildlife.ca.gov/Conservation/Environmental-Review/LSA#fees>).
- Change the use type to “cannabis irrigation” or both “domestic use and cannabis irrigation” as appropriate. Site observations indicate that the existing point of diversion was used solely for irrigation purposes. No domestic use or associated infrastructure was observed onsite.
- Based on existing water use, please provide justification for water use numbers provided.
- Provide additional detail on the proposed rate of diversion. This information should be based on the water pump and other diversion

Kathy Hall  
EPIMS-HUM-04338-R1C  
December 13, 2024

infrastructure. Provide the model number and specifications of the pump proposed for use.

- Please provide a Diversion Infrastructure Plan that includes, the proposed location of the diversion, the proposed diversion period, and the infrastructure used to divert water, including but not limited to the pump type (and rate), the pipe diameter, and screen size. Please indicate where the water will be diverted to and if/how it will be stored.
- Note, the initial statement of use included in your amendment request contains errors. Please consider reviewing, revising, and resubmitting this information to CDFW and the State Water Board Division of Water Rights.
- Submit a cannabis remediation fee.

**Please note that you may not implement changes proposed in an amendment until CDFW approves the amendment.**

If you have questions regarding this letter, please Senior Environmental Scientist Specialist Kalyn Bocast at [kalyn.bocast@wildlife.ca.gov](mailto:kalyn.bocast@wildlife.ca.gov).

Sincerely,

DocuSigned by:  
  
3A06D096E401450...

Scott Bauer  
Senior Environmental Scientist Supervisor

ec: Kalyn Bocast  
California Department of Fish and Wildlife



ETA Humboldt &lt;etahumboldt@gmail.com&gt;

**EPIMS-HUM-04338-R1C Amendment Incomplete - Additional Information Needed**

5 messages

**Bocast, Kalyn@Wildlife** <Kalyn.Bocast@wildlife.ca.gov>  
To: vanessa valare <etahumboldt@gmail.com>

Tue, Jan 21, 2025 at 1:39 PM

Hello Vanessa,

I am reaching out regarding the incomplete amendment for EPIMS-HUM-04338-R1C. The incomplete notice requested additional information related to the use of water diverted from Little Larabee Creek. The information provided was unclear and more information is needed. Please answer the following questions.

1. The information provided states, "**Irrigation:** Irrigation water is sourced from an existing groundwater well. The permittee is asking CDFW to allow them to begin to divert water from this diversion for irrigation as well as for Domestic Use. Irrigation water would be diverted to fill the tanks during the Winter period and stored during forbearance. The groundwater well would be the sole source of irrigation water during the forbearance period."
  - a. The yellow highlighted area does not make sense and contradicts many parts of the amendment request. You state multiple times that the well water is the sole source for irrigation water, but also state that the applicant will divert water (presumably from the POD on Little Larabee Creek) for irrigation. You also state that the water storage tanks will be filled with irrigation water, however, in a separate paragraph you state that all water storage tanks will be for domestic use. Please be clearer on what is being proposed for water source and use as well as water storage.
2. Please provide information on the current well function and use on the property.
  - a. What is the quantity of water needed for cultivation irrigation annually?
  - b. Has a pump test been completed for this well? If yes, please provide a copy.
  - c. Is the well currently functional? Please turn on the well and provide photo evidence of the water meter currently connected to the well. Note this should be the same water meter observed during our inspections.
  - d. Can the well produce the quantity of water needed during the diversion forbearance period? If not, is there adequate water storage onsite to irrigate cannabis if the well does not produce the quantity of water needed?
3. Please provide additional information on domestic water needs and allocation.
  - a. How much domestic water is required annually? There is no residence onsite and presumably, drinking water would be the only domestic use. The required water for drinking would be relatively small for one year, presumably less than 2,500 gallons total.
  - b. The information provided states "Approximately 31,000 gallons of water tanks are present on the property for Domestic Use." Does this mean there are no tanks designated for irrigation storage? This is cause for concern provided that the well did not adequately produce during the 2024 growing season. CDFW would recommend 1) allocating most of the existing water tank storage for irrigation water and 2) additional water storage onsite to match the required need for cannabis irrigation during the forbearance period.
  - c. How would domestic water be managed to keep it separate from cannabis cultivation activities (e.g., separate tank(s) and water lines)?
4. Please provide additional information on the proposed point of diversion infrastructure and setup.
  - a. Will the proposed flow meter be installed between the flow regulator and the water tank or before the flow regulator and the water tank? Consider placing it between the flow regulator and the water tank.
  - b. Looking at the current configuration of the POD, water lines, and water tanks, the generator pump would need to pump a distance of approximately 1000 feet with an elevation gain of approximately 190 feet. The disclosed pump would not work in this scenario. Consider revising this plan (e.g., Move a water tank closer to the water pump and use an additional submersible pump placed in the tank to transfer water to the upper water tank(s)).
  - c. Provided that the prior generator pump used onsite was improperly maintained and leaking petroleum into the stream, what will be done to prevent petroleum leaks from contaminating the environment?

Thank you,

[Kalyn Bocast](#) (she/her) [Why?](#)

Senior Environmental Scientist Specialist

Watershed Enforcement Team

California Department of Fish and Wildlife

619 2nd Street

Eureka, CA 95501

Cell: (707) 798-7010



**ETA Humboldt** <etahumboldt@gmail.com>  
To: "Bocast, Kalyn@Wildlife" <Kalyn.Bocast@wildlife.ca.gov>

Tue, Jan 28, 2025 at 4:19 PM

Hi Kalyn,  
We have tried to get back into the amendment to upload the revised Diversion infrastructure plan and water management plan but the amendment is showing submitted status instead of correcting. Can you open it back up so we can submit the documents? I have attached them here as well. Thanks.

Best,  
Marisa  
[Quoted text hidden]

--  
**ETA Management Group LLC/ ETA Humboldt LLC**  
Environmental and Land-Use Consulting  
DBE, WBE, SB-Micro/PW, HUBZone, WOSB

 (707) 923-1180  
 [etahumboldt@gmail.com](mailto:etahumboldt@gmail.com)

**2 attachments**

 **Water Management Plan (Hall) 2024.pdf**  
135K

 **Diversion Infrastructure Plan (Hall) 2024.pdf**  
2032K

**Bocast, Kalyn@Wildlife** <Kalyn.Bocast@wildlife.ca.gov>  
To: ETA Humboldt <etahumboldt@gmail.com>

Wed, Jan 29, 2025 at 8:53 AM

Hi Marisa,

It should now be unlocked.

Thank you,

Kalyn

**From:** ETA Humboldt <etahumboldt@gmail.com>  
**Sent:** Tuesday, January 28, 2025 4:20 PM

**To:** Bocast, Kalyn@Wildlife <Kalyn.Bocast@Wildlife.ca.gov>

**Subject:** Re: EPIMS-HUM-04338-R1C Amendment Incomplete - Additional Information Needed

**WARNING:** This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

[Quoted text hidden]

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**Bocast, Kalyn@Wildlife** <Kalyn.Bocast@wildlife.ca.gov>

Wed, Jan 29, 2025 at 12:16 PM

To: ETA Humboldt <etahumboldt@gmail.com>

Hi Marisa,

I think you may have submitted a different amendment instead of uploading information to the existing amendment request which was last submitted on 12/23/24, amendment No. 002.

Also, from my first quick glance at the documents provided, there is at least one error. Please review the documents one more time before submitting to make sure the numbers are correct. Lastly, in the Water Management Plan, please state the cultivation size or alternatively the number of plants to be grown per year. The anticipated water need for irrigation seems a bit low given the site conditions and number of plants observed in prior cultivation seasons.

Thanks,

Kalyn

---

**From:** ETA Humboldt <etahumboldt@gmail.com>

**Sent:** Tuesday, January 28, 2025 4:20 PM

**To:** Bocast, Kalyn@Wildlife <Kalyn.Bocast@Wildlife.ca.gov>

**Subject:** Re: EPIMS-HUM-04338-R1C Amendment Incomplete - Additional Information Needed

**WARNING:** This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Hi Kalyn,

[Quoted text hidden]

[Quoted text hidden]

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**ETA Humboldt** <etahumboldt@gmail.com>

Wed, Jan 29, 2025 at 12:42 PM



ETA Humboldt &lt;etahumboldt@gmail.com&gt;

---

**Please reopen EPIMS-HUM-04338-R1-002 Amendment**

7 messages

---

**ETA Humboldt** <etahumboldt@gmail.com>  
To: Wildlife EPIMS Help <EPIMSHelp@wildlife.ca.gov>

Mon, Dec 23, 2024 at 3:10 PM

Hello,

Please reopen the amendment 002 for EPIMS-HUM-04338-R1/Rockaway Investments-Kathy Hall. I just realized I need to add a remediation fee in there and I need to put the payment information into the portal. Thank you.

--

**ETA Management Group LLC/ ETA Humboldt LLC**  
Environmental and Land-Use Consulting  
DBE, WBE, SB-Micro/PW, HUBZone, WOSB

(707) 923-1180

[etahumboldt@gmail.com](mailto:etahumboldt@gmail.com)

---

**Wildlife EPIMS Help** <EPIMSHelp@wildlife.ca.gov>  
To: ETA Humboldt <etahumboldt@gmail.com>  
Cc: Wildlife R1 LSA Eureka <R1LSAEureka@wildlife.ca.gov>

Mon, Dec 23, 2024 at 3:27 PM

Hello,

Headquarters does not handle payments. I have cc Region 1. They should be able to unlock the form or process fees using their specific method. You may also email Region 1 Coastal at [R1LSAEureka@wildlife.ca.gov](mailto:R1LSAEureka@wildlife.ca.gov) and/ or [EPIMS.R1C@wildlife.ca.gov](mailto:EPIMS.R1C@wildlife.ca.gov)

Thank you,

*Shannon Kiely*

Staff Services Analyst – EPIMS Help Desk

[Lake and Streambed Alteration Program](#)

Habitat Conservation Planning Branch

California Department of Fish and Wildlife

916-539-7699 | [Shannon.kiely@wildlife.ca.gov](mailto:Shannon.kiely@wildlife.ca.gov)

---

**From:** ETA Humboldt <etahumboldt@gmail.com>  
**Sent:** Monday, December 23, 2024 3:10 PM  
**To:** Wildlife EPIMS Help <EPIMSHelp@wildlife.ca.gov>  
**Subject:** Please reopen EPIMS-HUM-04338-R1-002 Amendment

**WARNING:** This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

[Quoted text hidden]

---

**Wildlife R1 LSA Eureka** <R1LSAEureka@wildlife.ca.gov>

Mon, Dec 23, 2024 at 4:00 PM

To: Wildlife EPIMS Help <EPIMSHelp@wildlife.ca.gov>, ETA Humboldt <etahumboldt@gmail.com>

Cc: Wildlife R1 LSA Eureka <R1LSAEureka@wildlife.ca.gov>

Good Afternoon,

We do not have your contact information as an authorized contact or secondary representative for this application. If you would like to be added, please have the applicant contact us directly at [R1LSAEureka@wildlife.ca.gov](mailto:R1LSAEureka@wildlife.ca.gov) to have your organization added. We will not be able to re-open until we receive confirmation.

Thank you,

### Linda Reece-Wahl

Staff Services Analyst – Habitat Conservation

California Dept. of Fish and Wildlife

Region 1 – Fort Bragg Field Office

[32330 North Harbor Drive, Fort Bragg, CA 95437](https://www.wildlife.ca.gov)



[Quoted text hidden]

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**ETA Humboldt** <etahumboldt@gmail.com>

Mon, Dec 23, 2024 at 4:05 PM

To: Wildlife R1 LSA Eureka <R1LSAEureka@wildlife.ca.gov>

I am not sure why that would be. We at ETA Management Group have been assisting the owner since they bought the parcel and we transferred the existing LSA into their name in 2022. We have been working directly with Kalyn Bocast and she told us we needed to include the remediation fee into the amendment that we filed for this project. We have mailed out the checks today and we wanted to be sure to include the check number into the payments portion of the EPIMS amendment correction that we just completed earlier today under her direction. We did include a submittal doc with the fees and check numbers that is clearly labeled with the project number. Hopefully you can just process the payment without us putting the info into the amendment in EPIMS because the permittee is out of town for the holidays. Thanks.

[Quoted text hidden]

---

**Wildlife R1 LSA Eureka** <R1LSAEureka@wildlife.ca.gov>

Mon, Dec 23, 2024 at 4:52 PM

To: ETA Humboldt <etahumboldt@gmail.com>

Cc: Wildlife R1 LSA Eureka <R1LSAEureka@wildlife.ca.gov>, "Bocast, Kalyn@Wildlife" <Kalyn.Bocast@wildlife.ca.gov>, "Aberg, Ryan@Wildlife" <Ryan.Aberg@wildlife.ca.gov>, "Bauer, Scott@Wildlife" <Scott.Bauer@wildlife.ca.gov>

Good Afternoon,



Thank you for sharing the additional details. It appears that we will need to wait for the check to arrive before we can process the amendment, which will give us time for Ms. Hall to send a confirmation email upon her return.

I did reach out to Ms. Bocast to verify, and we found that ETA Humboldt was listed for the former applicant, but not also for Ms. Hall. We are in receipt of the amendment application and there is a check number included. We will reach out to Ms. Hall as well.

Thank you for your understanding. We do need to check our applications against the included contacts and want to ensure accuracy.

Thank you, again,

## Linda Reece-Wahl

Staff Services Analyst – Habitat Conservation

California Dept. of Fish and Wildlife

Region 1 – Fort Bragg Field Office

32330 North Harbor Drive, Fort Bragg, CA 95437



[Quoted text hidden]

---

**Wildlife R1 LSA Eureka** <R1LSAEureka@wildlife.ca.gov>

Mon, Dec 30, 2024 at 10:11 AM

To: ETA Humboldt <etahumboldt@gmail.com>

Cc: Wildlife R1 LSA Eureka <R1LSAEureka@wildlife.ca.gov>, "Bocast, Kalyn@Wildlife" <Kalyn.Bocast@wildlife.ca.gov>

Good Morning,

CDFW has received the check for the upgrade from a Minor Amendment to a Major Amendment, as well as a 2<sup>nd</sup> check meant to cover the cost of a lesser Remediation (remediation area less than 1,000 square feet) Fee. Unfortunately, the second check is only \$3875.00 while the 2024 fee for a lesser Remediation is \$3,948.50. Please provide a check for the difference in order to proceed with your amendment.

Thank you,

Jaymes Silveira

Staff Services Analyst

Coastal Habitat Conservation Program

Northern Region

California Department of Fish and Wildlife

---

**From:** Wildlife EPIMS Help <[EPIMSHelp@wildlife.ca.gov](mailto:EPIMSHelp@wildlife.ca.gov)>  
**Sent:** Monday, December 23, 2024 3:27 PM  
**To:** ETA Humboldt <[etahumboldt@gmail.com](mailto:etahumboldt@gmail.com)>  
**Cc:** Wildlife R1 LSA Eureka <[R1LSAEureka@wildlife.ca.gov](mailto:R1LSAEureka@wildlife.ca.gov)>  
**Subject:** RE: Please reopen EPIMS-HUM-04338-R1-002 Amendment

Hello,

[Quoted text hidden]

---

**ETA Humboldt** <[etahumboldt@gmail.com](mailto:etahumboldt@gmail.com)>  
To: Wildlife R1 LSA Eureka <[R1LSAEureka@wildlife.ca.gov](mailto:R1LSAEureka@wildlife.ca.gov)>

Mon, Dec 30, 2024 at 10:22 AM

Ok, we will get that check out to you today. Thank you for letting us know.  
[Quoted text hidden]



## Permit

List of all current Permits

[Amendment Preview](#)   [Attachments](#)   [Alert History](#)   [Map](#)

### Amendment Details

 Copy

## EPIMS-HUM-04338-R1 - Rockaway Investments - 2020

### Amendment Details

<b>Notification Type:</b>	01446-Standard Agreement
<b>Region:</b>	Region 1
<b>Status:</b>	Submitted
<b>Amendment Number:</b>	003
<b>Amendment Type:</b>	Project Revision
<b>Amendment Title:</b>	Domestic Water Point of Diversion - Copy
<b>Initial Submit Date:</b>	Jan 29, 2025 10:47 AM
<b>Initially Submitted By:</b>	Kathy Hall
<b>Last Submit Date:</b>	
<b>Last Submitted By:</b>	
<b>Approved Date:</b>	

### Contact Information

#### Primary Contact Information

<b>User Title:</b>	Ms. Kathy	Middle Name	Hall
	First Name		Last Name
<b>User Email*:</b>	rockawayinvestmentsllc@gmail.com		
<b>User Address*:</b>	504 2nd avenue		

Rio Dell California 95562  
City State/Province Postal Code/Zip

**User Phone\*:** (707) 223-4898 Ext.  
Phone

## Organization Information

**Organization Name\*:** Rockaway Investments LLC

**Organization Type\*:** Business

**Organization Website:**

**Address\*:** 504 2nd Street

Rio Dell California Ext. 95562  
City State/Province Postal Code/Zip

**Phone\*:** (707) 223-4898 Ext.

## Amendment and/or Extension

---

### *Request to Amend Agreement*

Are you requesting to amend the current agreement?

**Response\*:** Yes

## Amendment Type

- A minor amendment is one that would not significantly modify the scope or nature of any project covered by the agreement or any measure included in the agreement to protect fish and wildlife resources, as determined by CDFW, or an amendment to transfer the agreement to another entity by changing the name of the entity to the name of the transferee (see Cal. Code Regs., tit. 14, § 699.5, subd. (a)(10)).
- A major amendment is one that would significantly modify the scope or nature of any project covered by the agreement or any measure included in the agreement to protect fish and wildlife resources, or require additional environmental review, as determined by CDFW (see Cal. Code Regs., tit. 14, § 699.5, subd. (a)(7)).

**Amendment Type\*:** Major

## Agreement Transfer

**Does this amendment include the transfer of the current LSA Agreement?**

Note: The transferee will be required to register for an account in EPIMS for the transfer to be completed.

**Response\*:** No

## Amendment Description

Describe the amendment in detail:

- o Written description of all project activities with detailed step-by-step description of project implementation.
- o Include any structures (e.g., rip-rap, culverts) that will be placed or modified in or near the stream, river, or lake, and any channel clearing.
- o Specify volume, and dimensions of all materials and features (e.g., rip rap fields) that will be used or installed.
- o Include diagrams, drawings, design plans, construction specifications, and maps in the Documents and Maps section.

**Amendment Details\*:**

Domestic water point of Diversion

Character Limit: 10,000

Explain the reason(s) for the amendment request.

**Amendment Explanation\*:**

The applicant does not currently have a reliable safe access point for fresh drinking water. A well is used for cultivation activities but isn't suitable for drinking water.

Character Limit: 10,000

***Request to Extend Agreement Term***

Are you requesting to extend the current agreement term?

**Response\*:** No



**Documents and Maps**

- Description:** Statement of Use intl\_stmnt\_form- Kathy Hall.pdf
- Description:** Water usage map Kathy Hall\_DomesticUse\_MAP.pdf
- Description:** Diversion Infrastructure Plan Diversion Infrastructure Plan Hall 2024.docx
- Description:** Revised Diversion Infrastructure Plan  
Revised Diversion Infrastructure Plan Hall 2024.pdf
- Description:** Revised water management Plan Revised Water Management Plan Hall 2024.pdf

**Electronic Signature**

---

I hereby certify that to the best of my knowledge the information in this amendment and/or extension request ("request") is true and correct and that I am authorized to sign this request as, or on behalf of, the applicant.

**I Certify\*:** Yes

---

I understand that if any information in this request is found to be untrue or incorrect, CDFW may suspend processing this request or suspend or revoke any draft or final Lake or Streambed Alteration Agreement issued pursuant to this request.

**I Understand\*:** Yes

---

I understand also that if any information in this request is found to be untrue or incorrect, I and/or the applicant may be subject to civil or criminal prosecution.

**I Understand\*:** Yes

---

I understand that this notification applies only to the project(s) described herein and that I and/or the applicant may be subject to civil or criminal prosecution for undertaking any project not described herein, unless CDFW has been separately notified of that project in accordance with Fish and Game Code section 1602 or 1611.

**I Understand\*:** Yes

---

**Electronic Signature\*:** Kathy Hall  
First and Last Name

**Date\*:** 11/01/2024

**Total Fees Due**

**Total Fees Due**

**Amendment Fees:** \$1,882.25  
**Extension Fee:** \$0.00  
**TOTAL (All Fees):** \$1,882.25

**Payment Information**

<b>Payment Method</b>	<b>Document#*</b>	<b>Name of the Bank/Institution*</b>	<b>Check/Money Order #*</b>
Check/Money Order		Umpqua Bank	191
Check/Money Order		Umpqua Bank	235



---

**From:** Wildlife EPIMS Help <[EPIMSHelp@wildlife.ca.gov](mailto:EPIMSHelp@wildlife.ca.gov)>  
**Sent:** Monday, December 23, 2024 3:27 PM  
**To:** ETA Humboldt <[etahumboldt@gmail.com](mailto:etahumboldt@gmail.com)>  
**Cc:** Wildlife R1 LSA Eureka <[R1LSAEureka@wildlife.ca.gov](mailto:R1LSAEureka@wildlife.ca.gov)>  
**Subject:** RE: Please reopen EPIMS-HUM-04338-R1-002 Amendment

Hello,

[Quoted text hidden]

---

**ETA Humboldt** <[etahumboldt@gmail.com](mailto:etahumboldt@gmail.com)>  
To: Wildlife R1 LSA Eureka <[R1LSAEureka@wildlife.ca.gov](mailto:R1LSAEureka@wildlife.ca.gov)>

Mon, Dec 30, 2024 at 10:22 AM

Ok, we will get that check out to you today. Thank you for letting us know.  
[Quoted text hidden]

Draft To: "Bocast, Kalyn@Wildlife" <Kalyn.Bocast@wildlife.ca.gov>

I'm not sure what is going on with the EPIMS system. I have it open and I am looking at the amendments and 003 is showing as the same project revision-COPY. I am not sure what that means. When I opened up the EPIMS this morning to upload the documents, Amendment 003 was on the front page of recent negotiations and was showing as correcting, so I submitted the documents to that amendment. Is it possible that the system duplicated the amendment and renumbered it as 003? We haven't filed a third amendment. We filed to amend the project to transfer it into Kathy Hall's name a year or more ago, and then we filed the major amendment to add the stream diversion to the agreement. If you look at amendment 2 and 3, they are identical down to the payment amounts and check numbers. This is not something we did. There must be something wrong with the system. I have uploaded the documents to amendment 2, but amendment 3 is not something we entered into the system, I believe it must be a glitch of some sort.

Regarding water usage the use numbers are based on previous cultivation seasons water use. Unfortunately in my haste to upload the documents into the correct amendment, I missed your request in your email to add the cultivation size to the water management plan. The cultivation size has never changed, it is

[Quoted text hidden]

# Diversion Infrastructure Plan

**Lake and Streambed Alteration Agreement: Notification No. EPIMS-HUM-04338-R1**  
**Permittee: Kathy Hall**  
**Project Name: Rockaway Investments Stream Crossings and water diversion Project**  
**Assessor Parcel Number: 208-111-028**  
**Prepared by**  
**ETA Management Group LLC**  
**1150 Evergreen Rd. Unit 2**  
**Redway, CA 95560**

**Point of Diversion Location:** 40.4731, -123.7667

**Point of Diversion Type:** Class I Watercourse

**Project Encroachment Description:**

Proposed Water diversion from Little Larabee Creek during the winter to a collection of HDPE water storage tanks with a total capacity of 28,250-gallons for domestic and irrigation use.

Diversion rate up to three (3) gallons per minute.

**Irrigation:** The permittee is asking CDFW to allow them to begin to divert water from this diversion for irrigation as well as for Domestic Use. Irrigation water would be diverted to fill the tanks during the Winter period and stored for use during forbearance.

**Proposed Diversion Infrastructure**

The proposed diversion will consist of a screened 1" polyethylene pipe located on the bank of a Class I watercourse of which will be conveyed by a Hypro D30GRGI with GX160QHG gas engine Water Pump located outside of the riparian buffer of 150ft to a collection of water storage tanks. The pump will move the water approximately 190 feet in elevation gain and approximately 1000 feet to the water storage tanks. A 3gpm flow restrictor will be installed on the inlet of the primary holding tank to ensure only 3gpm of flow is diverted. The diversion pipe will not be installed at the bottom of the channel but set on the bank of the channel. A WM100PVX— 1" NPT multi-jet water meter with will be installed at the inlet of the primary holding tank. A FR34-3GPM flow restriction device will be added to the primary holding tank so that diversion rate will never exceed 3gpm.

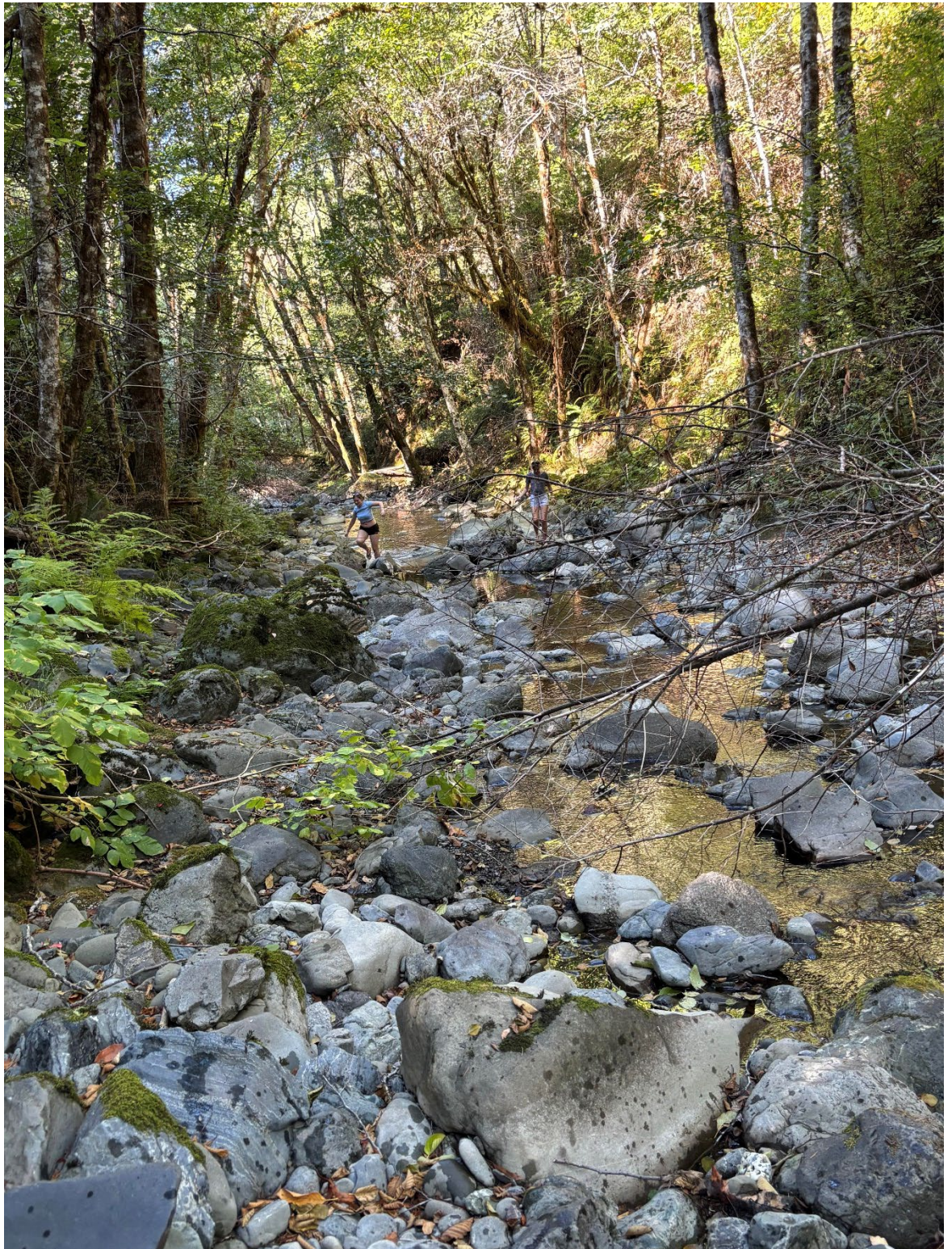
Diversion is from Little Larabee Creek which flows year-round. No diversion is proposed during the dry season. Currently, 28,250-Gallons of water tanks are present on the property for irrigation and domestic use. The intake structure has no polluting materials. The intake structure is appropriately placed, to not impede sheet flow/ restrict in channel flows and will not divert more than 10% of flow. The intake structure will be screened with less than 3/32-inch openings in screen structure. The intake does not impede aquatic species passage. The intake structure is contained and does not allow for entrance and or entrapment of amphibians or other wildlife. Water will be primarily collected in the winter to a collection of storage tanks. The pump will be used within secondary containment to prevent any potential leak of petroleum products.

**Diversion Infrastructure Plan**

The project proposes to continue operation of an existing water diversion, The diversion infrastructure has been removed and this infrastructure plan is proposed. The proposed diversion infrastructure in this plan complies with standards specified by the California Department of Fish and Wildlife in the Lake and Streambed Alteration Agreement and California Code of Regulations, title 14, section 722. There would be no significant adverse impact on endangered, threatened, or rare species or their habitat pursuant to §15065. There would be no significant adverse impact on endangered, threatened, or rare species or their habitat pursuant to §15065. There are no hazardous materials at or around the project site that may be disturbed or removed. If the diversion structure is to be upgraded or improved at any time the materials provided below will assist in designing and installing an improved diversion structure.

(Insert map)

Proposed Diversion Location reference photo (may not be installed in exact location)



**Hypro Diaphragm Pump D30GRGI with Honda GX160QHG gas engine**  
**Water Pump Specification Sheet**

9910-D30GRGI:

- Max flow: 9.5 gpm
- Max pressure: 580 psi
- Includes 9910-GS40GI pressure regulator and 9910-KIT1640 gearbox with 3/4" hollow shaft for mounting on 5 to 6.5 hp gas engines
- Port sizes: 1" HB inlet, (2) 1/2" HB outlet, 3/4" HB bypass
- Pump shaft rotation: CW and CCW
- Diaphragms: 2, semi-hydraulic, Desmopan® standard Buna available
- Housing: Anodized aluminum
- Max fluid temperature: 140°F

Honda GX160 Recoil Start Engine:

- Engine type: Air-cooled 4-stroke OHV
- Starting system: Recoil starter
- Shaft: 3/4" solid keyed
- Bore x stroke: 68 x 45 mm
- Displacement: 163 cm<sup>3</sup>
- Net power output: 4.8 HP (3.6 kW) @ 3600 rpm
- Net torque: 7.6 lb-ft (10.3 Nm) @ 2500 rpm
- PTO shaft rotation: Counterclockwise from PTO shaft side
- Compression ratio: 9.0 : 1
- Lamp/Charge coil options: 25W, 50W / 1A, 3A, 7A
- Carburetor: Butterfly
- Ignition system: Transistorized magneto
- Lubrication system: Splash
- Governor system: Centrifugal mechanical
- Air cleaner: Dual element
- Oil capacity: 0.61 US qt. (0.58 L)
- Fuel tank capacity: 3.3 US qts (3.1 liters)
- Fuel: Unleaded 86 octane or higher
- Dry weight 33 lbs (15.1 kg)
- Dimensions: 12.2 in long x 14.3 in wide x 13.6 in high (312 x 362 x 346 mm)
- Warranty: 3 year commercial warranty (limited to manufacturer defects)

## Multi-Jet Water Meters with Pulse Output



**Brass Water Meters** for indicating flow totalization of water. Designed for long service life and maintenance-free operation, even under harsh conditions.

### Features:

- Pulse Output Components
- All Meters have Hydrocarbon Resistant Seals and will not be damaged by dissolved amounts of free product
- Sealed Dry Dial for Clear Readings
- Internal Strainer to Protect Meter from Particulate Damage

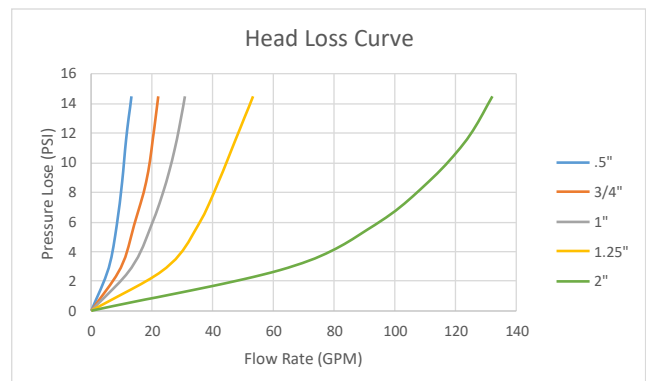
### Specifications:

- Class: B
- Accuracy: Transitional Flow:  $\pm 5\%$   
Nominal Flow:  $\pm 2\%$
- Maximum Water Temperature: 104°F
- Maximum Water Pressure: 150 psi
- Mounting Orientation:  
1/2" and 3/4" Horizontal or Vertical  
1" to 2" Horizontal Mounting

### Materials:

- Body: Brass, polyethylene
- Couplings: Brass
- Measuring Chamber: Polyethylene
- Paint: Epoxy Coated
- Seal: Viton

**Contains lead, not for use with potable water**



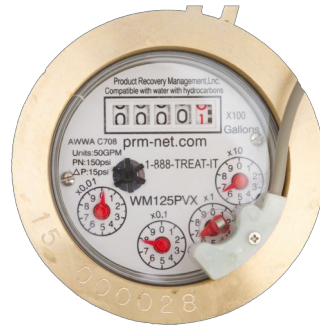
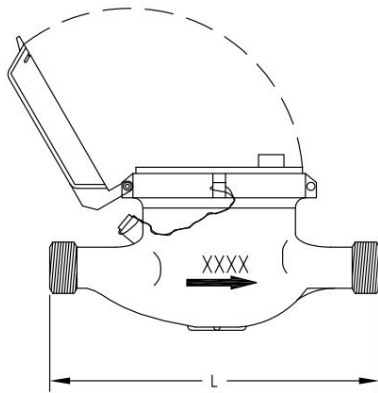
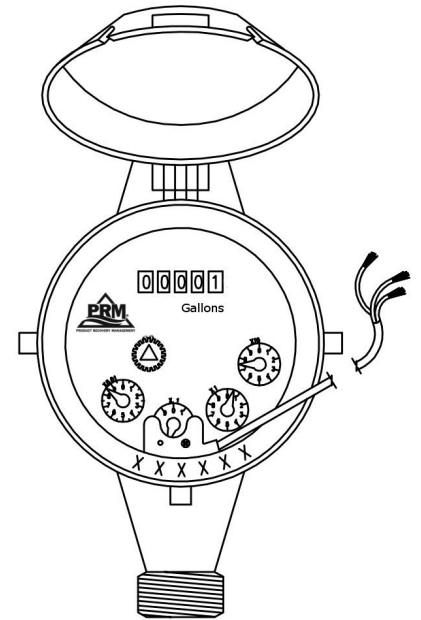
### PRM Part Number: Description

- WM050PVX— 1/2" NPT multi-jet water meter
- WM075PVX— 3/4" NPT multi-jet water meter
- WM100PVX— 1" NPT multi-jet water meter
- WM125PVX— 1-1/4" NPT multi-jet water meter
- WM150PVX— 1-1/2" NPT multi-jet water meter
- WM200PVX— 2" NPT multi-jet water meter

(888-TREAT-IT) • [www.prmfiltration.com](http://www.prmfiltration.com) • [sales@prmfiltration.com](mailto:sales@prmfiltration.com)



# Multi-Jet Water Meters with Pulse Output



Pulse Rates can be manually changed.

Factory Set Pulse Rates:

WM050PVX: 1 pulse per gallon

WM075PVX: 1 pulse per gallon

WM100PVX: 1 pulse per 10 gallons

WM125PVX: 1 pulse per 10 gallons

WM150PVX: 1 pulse per 10 gallons

WM200PVX: 1 pulse per 10 gallons

Part #:	Size:	Length (in)	Length with NPT adapters	Height (in)	Weight (lbs.)	Max. Flow	Nom. Flow Range
						Gallons Per Minute	
WM050PVX	1/2" NPT	7	10.5	4.75	3	10	1-10
WM075PVX	3/4" NPT	8	12	4.75	3.5	20	1-20
WM100PVX	1" NPT	10.5	14.5	4.5	5.5	30	2-30
WM125PVX	1-1/4" NPT	10.5	15.5	5	8	50	3-50
WM150PVX	1-1/2" NPT	12	18	6.5	12	75	4-75
WM200PVX	2" NPT	12	18	6.5	14	130	5-130

Information in this drawing is provided for reference only.

(888-TREAT-IT) • [www.prmfiltration.com](http://www.prmfiltration.com) • [sales@prmfiltration.com](mailto:sales@prmfiltration.com)

# Dilution™

## SOLUTIONS

To order call 1-800-451-6628

### FLOW RESTRICTOR

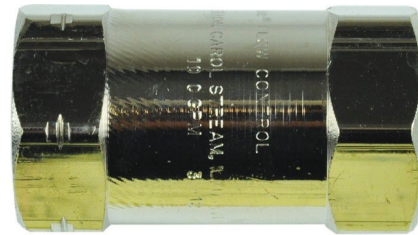
Item #:

- FR34-3GPM
- FR34-7GPM
- FR34-9GPM
- FR34-10GPM
- FR1-20GPM

### SPECIFICATIONS

Flow Restrictors limit the flow of water.

It is recommended to install a flow restrictor on the inlet side of the Dosatron unit if there is any possibility of overflowing the unit.



Description	Item #
3/4" - 3 GPM Max	FR34-3GPM
3/4" - 7 GPM Max	FR34-7GPM
3/4" - 9 GPM Max	FR34-9GPM
3/4" - 10 GPM Max	FR34-10GPM
1" - 20 GPM Max	FR1-20GPM

# Dilution™

## SOLUTIONS

To order call 1-800-451-6628

### FLOW RESTRICTOR

Item #:

- FR34-14GPM
- FR200-40GPM



Description	Item #
1" - 14GPM max ow restriction. 2 1" to 3 4" reducer bushings.	FR34-14GPM

### SPECIFICATIONS

Flow Restrictors limit the ow of water.

It is recommended to install a ow restrictor on the inlet side of the Dosatron unit if there is any possibility of over owing the unit.



Description	Item #
1 1 2" female NPT 40 GPM Max. PVC	FR200-40GPM

# Water Management Plan

**Lake and Streambed Alteration Agreement: Notification No. EPIMS-HUM-04338-R1**  
**Permittee: Kathy Hall**  
**Project Name: Rockaway Investments Stream Crossings and water diversion Project**  
**Assessor Parcel Number: 208-111-028**  
**Prepared by**  
**ETA Management Group LLC**  
**1150 Evergreen Rd. Unit 2**  
**Redway, CA 95560**

## Water Source and System

The irrigation water source for this project has historically been a groundwater well. Applicant is proposing to add a stream diversion to the project for irrigation and domestic use. There is a total of 34,200-gallons of HDPE water storage tanks associated with this project. The water tanks would be filled to capacity during the diversion period and stored for use during the forbearance period. Once the water tanks were empty, they would continue to be filled by the groundwater well during the forbearance period. One 2,500-gallon HDPE water storage tank will be dedicated to domestic use and would be filled by the stream diversion during the forbearance period. There is currently a meter installed on the groundwater well. The stream diversion will be metered separately to ensure minimization requirements are being met.

## Water Storage and Usage

Projected Water use for this site is approximately 83,946-gallons. The projected water use for the cannabis is approx. 65,646-gallons. Domestic water use is expected to be approx. 50-gallons per day for a total of 1500-1550-gallons per month. This water use is an estimate to the best of my knowledge.

There is currently a total of 14 (twelve) HDPE water storage tanks on the parcel consisting of three 5,000-gallon tanks, five 2,500-gallon tanks, three 1,500-gallon tanks, one 1,100-gallon tank, one 800-gallon tank and one 300-gallon tank. One of the 2,500-gallon tanks will be for domestic use, filled from the stream diversion, and one 2,500-gallon tank is for firefighting use, filled from the stream diversion. All other tanks are for Irrigation use.

Point of Use	Source of Water	Storage available
Domestic Use	Stream Diversion	2,500-gallon HDPE tank
Fire Prevention	Stream Diversion	2,500-gallon HDPE tank
Irrigation	Stream Diversion/groundwater well	29,200-gallons total consisting of 3 qty 5,000-gallon tanks, 3 qty 2,500-gallon tanks, 3 qty 1,500-gallon tanks, 1 qty 1,100-gallon tank, 1 qty 800-gallon tank and 1 qty 300-gallon tank

## Water Conservation Infrastructure

The applicant will utilize drip irrigation throughout this cultivation sites. Float valves will be installed on every water tank to ensure no overflow occurs. A water meter has been installed on the well to monitor water usage, and logs will be kept regularly. A water meter will also be installed between the stream diversion and the tanks to ensure diversion minimization requirements are being met. Meter logs will be kept for the stream diversion as well. The slow rate of drip irrigation provides water at a rate that runoff will be preventable. Drip emitters are set to output the lowest amount of water possible over a period of time to minimize excess water use and eliminate runoff personalities. The entire irrigation system, all water lines, drip emitters and connections will be inspected for water leaks regularly, and any damaged equipment is replaced immediately to prevent water loss.

## Water Discharge

All cannabis cultivation activities occur at least 200 feet away from the Class I watercourse. Cultivation fertilizer holding tanks exceed 200 ft setback from nearest water source.

In all cultivation areas mulched organic matter will be spread on topsoil to help with evaporation and runoff. Heavy amounts of peat moss and coco coir are also amended into soil periodically to prevent runoff from fertilizer. Cannabis cultivation will employ drip irrigation to prevent run off from watering. All poly-flex irrigation water lines are anchored, located up and out of drainages, and sited in a responsible way so as not to impede water flow through stream channels.

## Monthly Water Use Table

Month	Cultivation Use	Domestic Use
January	0	1,550
February	0	1,450
March	1,879	1,550
April	3,296	1,500
May	4,832	1,550
June	8,991	1,500
July	12,281	1,550
August	13,486	1,550
September	11,049	1,500
October	9,832	1,550
November	0	1,500
December	0	1,500
<b>Total</b>	<b>65,646 gallons</b>	<b>18,300 gallons</b>

**From:** [ETA Humboldt](#)  
**To:** [Bushnell, Michelle](#); [Ford, John](#)  
**Cc:** [Johnson, Cliff](#); [Kathy Hall](#); [Black O'Shaughnessy](#)  
**Subject:** [Kathy Hall - Mana Farms](#)  
**Date:** Wednesday, January 29, 2025 1:28:38 PM  
**Attachments:** [EPIMS-HUM-04338-R1C Amendment Incomplete 1.pdf](#)  
[Gmail - Please reopen EPIMS-HUM-04338-R1-002 Amendment.pdf](#)  
[Gmail - EPIMS-HUM-04338-R1C Amendment Incomplete - Additional Information Needed.pdf](#)  
[Environmental Permit Information Management System.pdf](#)  
[Revised Diversion Infrastructure Plan Hall 2024.pdf](#)  
[Revised Water Management Plan Hall 2024.pdf](#)

**Caution:** This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Greetings again,

I just got off the phone with Kathy and apparently there is some confusion over the LSAA. I filed it initially for domestic use only. Kalyn Bocast from CDFW sent me back an incomplete letter (attached) asking for the diversion to be added as cannabis as well.

The epims permit system is difficult and my firm was unable to refile the documents that Kalyn Bocast of CDFW required for Kathy Hall to move forward. Additionally in the attached emails you will find proof of payment for the water rights applied for in the amendment. The fees were 1882.25 for the major amendment and 3,948.50 for a remediation fee.

Please if you have any more questions regarding corrective actions made by my client, please feel free to contact me.

Thank you,  
Vanessa

On Wed, Jan 29, 2025 at 10:40 AM ETA Humboldt <[etahumboldt@gmail.com](mailto:etahumboldt@gmail.com)> wrote:

Greetings,

I would like to address some of the concerns that arose in today's conversation between Michelle Bushnell, John Ford and my client Kathy Hall.

I am attaching quite a few documents for review. Most importantly the amendment we filed for water rights to the creek with CDFW, and the well drawdown test. Both of these items were initially included in our appeal notice that we sent in and paid for. I am also attaching that in case anyone has not seen the document. Additionally I'm sending the water board clean up report and Adona's notes about what to do next, which we have started those processes as well. .

CDFW has asked for the amendment we put in for cannabis and domestic water use. However domestic use is all Kathy is requiring. Usually in a case like this if CDFW approved a diversion for cannabis on a 1.0 application it's a simple modification and map edit.

Some of my confusion comes into this because I have had several clients have water issues with CDFW due to paperwork not being filed on the clients behalf. Filing the correct amendments has always solved the problem. None of my other clients that have had this type of confusion have had their permits revoked.

I would like to also point out the majority of the mess on this property exists with the previous Owner, Brandon Rivas. He won the mediation against the neighbor Thomas Morgan that a lot of that waste was in fact Thomas Morgans. It was supposed to be added to hsi conditions of approval but he withdrew his permit, leaving the mess to the only legal farm that can be held responsible, Mana Farms. Kathy Hall cleaned up all these legacy waste areas as a sign of good faith towards clearing this all up.

Additionally I wrote this email below and did not receive a response from anyone in the county.

Thank you for your time in this matter, I believe Kathy is on her way to the planning department now to sort this out.

I am available by phone.

Revocation Status of Mana Farms (PLN-12280-CUP)



ETA Humboldt <[etahumboldt@gmail.com](mailto:etahumboldt@gmail.com)>

Fri, Jan 10, 1:33 PM

to John, Cliff, Kathy, Mack, Michael



Greetings Mr. Ford,

First, Happy New Year to you and your staff – thank you so much for serving our community over the past years.

I am writing to you today regarding one of my clients, Kathy Ann Hall of Mana Farms LLC. Humboldt County Permit PLN-12280-CUP (Permit) is attached to APN 208-111-028 (Subject Parcel). Ms. Hall's Permit is currently suspended and – as far as I know – is still referred to the Board of Supervisors for a revocation hearing based on observations made during a non-consent inspection of the Subject Parcel on 24 October 2024.

As I believe you are aware, Ms. Hall has appealed the Planning Department's decision to suspend the Permit based on several inaccuracies listed in the "Summary of issues" portion of the *Notice of Suspension* letter dated 31 October 2024 (see bulleted list below). To the best of my knowledge, the matter involving Ms. Hall's permit at the Subject Parcel has been postponed before the BOS on a couple of occasions. **The purpose of this email is to respectfully request that this matter be immediately and indefinitely removed from the BOS agenda, given Ms. Hall's demonstrable intent to remediate issues of environmental and regulatory concern at the Subject Parcel.**

Please recall the following inaccuracies in the "Summary of issues," which are also listed in Ms. Hall's *ACIR Response Letter*, dated 4 November 2024:

- Issue 1 is based on false assumptions regarding the use of well infrastructure and a misreading of the installed water meter at the Subject Parcel;
- Issue 4 is based on the incorrect assumption that all *Conditions of Approval* were due prior to the 24 October inspection;
- Issue 5 is based on the incorrect assumption that LSAA Notification No. EPIMS-HUM-04338-R1C was not officially transferred by original applicant Brandon Rivas to current Permittee Kathy Ann Hall on 15 November 2023
- Issue 6 includes an error regarding waste oil, which is not now and never has been confirmed as present at the Subject Parcel. All waste related to permitted cultivation of cannabis at the Subject Parcel has been removed and disposed of properly. Receipts for this work are available upon request.
- Issues 2 and 3 are currently in progress and should not alone be grounds for immediate suspension/revocation given Ms. Hall's documented responsiveness to notices and inquiries from Humboldt County and resource protection agencies.

To date, Ms. Hall has made substantial progress toward remediating all violations of relevant environmental protection regulations and industry agreements. She has retained my firm for the purposes of assisting with this remediation/clean-up effort at her own expense, despite the market and margin pressures we all feel during this difficult time. In addition to her correspondence with your office, Ms. Hall has also demonstrated forward progress with agency regulators including Ms. Adona White at the North Coast Regional Waterboard. A photograph log documenting the remediation work performed by Ms. Hall has been prepared by my firm and is available upon request. **It is my professional opinion that Ms. Hall has made substantial progress toward addressing alleged violations at the Subject Parcel and she has done so in good-faith toward promptly resolving all issues and achieving full compliance with the terms of the Permit since receiving *Suspension Notice* on 31 October 2024.**

I've also taken this opportunity to review public information regarding previous Humboldt County Permit Revocation cases brought before the Board of Supervisors since Prop 64 went into effect. **It is my firm belief that Ms. Hall's case does not yet meet historical precedent for a Revocation Hearing, especially considering the timeline of events since 24 October 2024.**

Other previously revoked permits (e.g. Grebo LLC Conditional Use Permit, Record Number PLN-11207-CUP, attached) were given multiple notices and opportunities to discuss the suspension/revocation over the course of many months between inspection and revocation. The revocation process for Grebo LLC began with a failed county site inspection in July 2022, included a second site inspection in February 2023, and concluded in Revocation in March 2024. During the nearly full year after the second annual inspection, Grebo LLC was determined to be non-responsive to several attempts made by Humboldt County to allow the permittee to address alleged violations.

**In approximately two (2) months (during the winter holidays, for what it's worth), Ms. Hall has experienced what I can only describe as a fast-track to revocation.** Unlike the Grebo case described above, Ms. Hall has been highly responsive to all notices and correspondence with Humboldt County and relevant resource protection agencies. Furthermore, Ms. Hall does not have outstanding balances or unpaid permit fees, which seems to be a common thread of the few revocation cases I've been able to research (e.g. Highpoint Honeydew Farm, LLC Record Number PLN-2018-15260, attached). It should be noted that Highpoint was operating without any state cultivation permits, an important distinction from Ms. Hall who has historically demonstrated a reasonable willingness to operate her business according to local and state compliance standards. It should also be noted that nearly six (6) months lapsed between Highpoint's failed inspections/NOV and subsequent permit revocation. Based upon my research, Ms. Hall should have several additional months to address alleged violations at the Subject Parcel before a revocation hearing.

Finally, Mr. Ford, I urge you to consider our current economic conditions as you come to your conclusions regarding Ms. Hall and the Subject Parcel. If we embrace quick revocation of our community's ability to earn income, we accept that important restoration and cannabis remediation efforts will likely never be funded or completed. In my opinion, identifying issues and helping our community resolve them is the type of legacy this industry and this community deserves.

Thank you for considering this lengthy message – I truly have faith in Ms. Hall's commitment to resolving the listed concerns and I stand behind members of my community trying to improve and do the right thing.

Most sincerely,

Vanessa Valare

--

**ETA Management Group LLC/ ETA Humboldt LLC**  
Environmental and Land-Use Consulting  
DBE, WBE, SB-Micro/PW, HUBZone, WOSB

(707) 923-1180  
[etahumboldt@gmail.com](mailto:etahumboldt@gmail.com)

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**ETA Management Group LLC/ ETA Humboldt LLC**  
Environmental and Land-Use Consulting  
DBE, WBE, SB-Micro/PW, HUBZone, WOSB

(707) 923-1180  
[etahumboldt@gmail.com](mailto:etahumboldt@gmail.com)

# Notice of Receipt for Cannabis Small Irrigation Use Registration

**Registration ID:** H514505

**Applicant Name:** Kathy Hall

**Mailing Address:** 504 2nd Avenue, Rio Dell, CA 95562

**Phone Number:** (707) 223-4898

**Email Address:** manafarmsllc@gmail.com

**Place of Use APNs:** 208-111-028-000

**Watersource:** Groundwater Well

**THIS NOTICE OF RECEIPT IS NOT A WATER RIGHT**

Based on the response provided for your cannabis cultivation water source, you do not need to file for a Small Irrigation Use Registration. You may use your existing water source for cannabis cultivation. Be aware - you may still need coverage under the Cannabis General Order. Even if you do not need a water right for your project, you are still required to comply with the Cannabis Cultivation Policy and all other state and local requirements that pertain to your water source. The Cannabis Cultivation Policy has additional requirements for your diversions including groundwater wells, and discharges.

If you feel you have reached this page in error, please contact the Cannabis Registration Unit at [cannabisreg@waterboards.ca.gov](mailto:cannabisreg@waterboards.ca.gov) or 916-319-9427.

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

1001 I Street, Sacramento, CA 95814 | Mailing Address: P.O. Box 100, Sacramento, CA 95812-0100 | [www.waterboards.ca.gov](http://www.waterboards.ca.gov)





# State Waterboard Cannabis General Order and Small Irrigation Use Registration Portal

etahumboldt@gmail.com completed application 459336 on 01/28/2025 16:04:45

## Introduction

Welcome to the Cannabis Cultivation General Order and Small Irrigation Use Registration Portal. This application allows cannabis cultivators to apply for coverage under the State Water Resources Control Board General Waste Discharge Requirements and Waiver of Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities (Cannabis Cultivation General Order) and to file for a water right registration for Small Irrigation Use for Cannabis Cultivation. The portal consists of the following sections:

Section A: Screening questions to determine if you must obtain coverage under the Cannabis Cultivation General Order.

Section B: Screening questions to determine if you need and are eligible for a small irrigation use water right registration.

Section C: Questions regarding the applicant's contact and property information.

Section D: Specific questions pertaining to the Cannabis Cultivation General Order (if applicable).

Section E: Specific questions pertaining to water rights registrations (if applicable).

Section F: Self-Certification for compliance with your Small Irrigation Use Water Right Registration (if applicable).

Section G: Questions regarding processor applicant's contact and property information (if applicable).

Your answers to the questions in this portal will help determine if you need coverage under the Cannabis Cultivation General Order, a Small Irrigation Use water right registration, both, or neither. You may not be asked to complete all sections. Depending on the answers provided to the screening questions in Sections A and B, you will see only the questions relevant to your waste discharge and/or water diversion activities.

Bookmarks are provided throughout the survey to enable you to return to a previous section if needed.

Questions that are marked with a  symbol are mandatory and must be answered in the application.

**Click 'Save and Continue' below to continue.**

## Section A - Cannabis Cultivation General Order Eligibility Questions

This survey was created for cannabis cultivators to apply for the State Water Boards Cannabis Cultivation General Order and the Small Irrigation Use Registration (SIUR) water right. The questions in Section A are to determine eligibility for coverage under the Cannabis Cultivation General Order.

### Section A - Applying for coverage under the Cannabis Cultivation General Order

**What best describes your situation?**



- I am not Seeking coverage under the State Cannabis Cultivation General Order at this time but will be seeking a Small Irrigation Use Registration (SIUR) water right.
- I am seeking coverage under the State Cannabis Cultivation General Order, with the goal to obtain evidence of enrollment with the State Water Resource Control Board, required for a California Department of Cannabis Control Cannabis Cultivation License
- My operation contains no cannabis cultivation component , I am applying for a Cannabis Processors License with the California Department of Cannabis Control.

### Section A - Completely Indoor Cultivation?

**Are your cannabis cultivation activities completely indoors?**



- Yes  No

'Indoors' refers to a structure with a permanent roof and a permanent relatively impermeable floor (e.g., concrete- or asphalt-paved). Indoor cannabis cultivation may be performed using hydroponic growing systems, soil, or other growth media.

### Section A - Discharge of Wastewater from Outdoor Cannabis Cultivation Activities

**Do your outdoor cannabis cultivation activities disturb less than one thousand (1,000) square feet and are your cannabis**

cultivation activities exempt from California Department of Cannabis Control cultivation licensing requirements under Proposition 64 (Health and Safety Code section 11362.2 ([https://leginfo.legislature.ca.gov/faces/codes\\_displaySection.xhtml?lawCode=HSC&sectionNum=11362.2](https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=HSC&sectionNum=11362.2))) or Proposition 215 (Health and Safety Code section 11362.77 ([https://leginfo.legislature.ca.gov/faces/codes\\_displaySection.xhtml?lawCode=HSC&sectionNum=11362.77](https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=HSC&sectionNum=11362.77)))?

Yes  No

## Section A - Cannabis Cultivation General Order Eligibility Notice

Use the following navigation buttons to return to the previous sections:

[Introduction](#) [Section A - Cannabis Cultivation General Order Eligibility Questions](#)

Based on your responses to the eligibility questions, you will either be conditionally exempt or enrolled as a tier 1 or tier 2 site (the site status will be determined later).

## End of Section A

Use the following navigation buttons to return to the previous sections:

[Introduction](#) [Section A - Cannabis Cultivation General Order Eligibility Questions](#)

You have reached the end of Section A. Click 'Save and Continue' below to continue to Section B.

## Section B - Small Irrigation Use Registration Water Rights Screening

Use the following navigation buttons to return to the previous sections:

[Introduction](#) [Section A - Cannabis General Order Eligibility Questions](#)

Questions in Section B are based on the **State Water Board's Cannabis Cultivation Policy** ([http://www.waterboards.ca.gov/water\\_issues/programs/cannabis/cannabis\\_water\\_rights.shtml#guidelines](http://www.waterboards.ca.gov/water_issues/programs/cannabis/cannabis_water_rights.shtml#guidelines)) and the Small Irrigation Use Registration Program requirements. This section will help determine whether you need a water right and your eligibility for a Small Irrigation Use Registration.

## Section B - Do you already have a Small Irrigation Use Registration?

- You can skip the remaining filing process for water rights in this portal if:
1. You have already filed for a Small Irrigation Use Registration for the Place of Use associated with your commercial cannabis cultivation.
  2. You have a permit or license that lists *irrigation* as a *purpose of use* during the diversion to storage season allowed by the **State Water Board's Cannabis Cultivation Policy** ([https://www.waterboards.ca.gov/water\\_issues/programs/cannabis/docs/policy/final\\_cannabis\\_policy\\_with\\_attach\\_a.pdf](https://www.waterboards.ca.gov/water_issues/programs/cannabis/docs/policy/final_cannabis_policy_with_attach_a.pdf)) for the Place of Use associated with your commercial cannabis cultivation.

Do conditions 1 or 2 apply to you?

Yes  No

If you answered **yes** to the previous question, then please provide your Cannabis Small Irrigation Use Registration ID or the application ID for your permit or license.

## Have you received a Notice of Violation from the Division of Water Rights?

Yes  No

Please enter your **Investigation ID** located on your Notice of Violation:


846112

## Section B - Water Source

### NOTES:

1. For more information on subterranean streams, please visit [http://www.waterboards.ca.gov/water\\_issues/programs/gmp/faqs.shtml](http://www.waterboards.ca.gov/water_issues/programs/gmp/faqs.shtml) ([http://www.waterboards.ca.gov/water\\_issues/programs/gmp/faqs.shtml](http://www.waterboards.ca.gov/water_issues/programs/gmp/faqs.shtml)).
2. The spring would flow off the property if it is not being diverted.
3. For Rainwater Catchment, water cannot channelize before entering your pond.

### Please check your water source(s) for your cannabis cultivation project.

Check all that apply 

- Stream, creek, gully (surface water channels), pond, lake, reservoir, and/or subterranean stream
- Spring that runs off the property at any time during the year.
- Spring located on the diverter's property that does NOT run off the property at any time during the year, in the absence of any diversions (fully contained spring).
- Groundwater well (Not a subterranean stream)
- Rainwater Catchment (does not include tarping of sites)
- Water Purveyor (municipal, retail supplier, water hauler, or other)

## Section B - No Small Irrigation Use Registration Required

Use the following navigation buttons to return to the previous sections:

Introduction

Section A - Cannabis General Order  
Eligibility Questions

Section B - Water Rights Eligibility  
Questions

Based on the response provided for your cannabis cultivation water source, you do not need to file for a Small Irrigation Use Registration. You may use your existing water source for cannabis cultivation. Be aware - you may still need coverage under the Cannabis General Order. Even if you do not need a water right for your project, you are still required to comply with the Cannabis Cultivation Policy and all other state and local requirements that pertain to your water source. The Cannabis Cultivation Policy has additional requirements for your diversions including groundwater wells, and discharges.

If you feel you have reached this page in error, please contact the Cannabis Registration Program at [Cannabisreg@waterboards.ca.gov](mailto:Cannabisreg@waterboards.ca.gov) or 916-319-9427.

## Section C - Cannabis Cultivation Site and Contact Information

**Provide information regarding your cannabis cultivation site and contact information. For Cannabis Cultivation General Order coverage, if your site is located on more than one parcel and the parcels are not contiguous (next to each other), you must submit a separate application for each non-contiguous cultivation area. Refer to the Cannabis Cultivation General Order for additional information.**

Enter the legal name of the cannabis cultivation site (e.g., the name of the operation or the facility name), if any. If the site does not have a legal name, enter the name of the site as you would like it to be identified.

The site name will be published on the public site of the State Water Board's database(s). We suggest you not use the address or Assessor's Parcel Number(s) of the site as the site name.

**Site Name**  Mana Farms LLC

Enter the physical address of the cultivation site (**NO P.O. BOX NUMBERS!**), including the county. If no address exists, use the street and nearest cross street.

For the street number, enter numbers only--no special characters.

For suites and apartments, please type the appropriate abbreviation, *APT* or *STE* in addition to the unit number. For example:

APT 337 or STE 337 instead of just 337

<b>Street Number</b> <input type="text"/>	<b>Suite/Apt</b> <input type="text"/>	<b>Street Direction</b> **Pick One** <input type="text"/>	<b>Street Name</b> ★ <input type="text" value="state"/> <input type="text" value="highway 36"/>	<b>Street Type</b> **Pick One** <input type="text"/>
<b>City</b> ★ <input type="text" value="Bridgeville"/>	<b>State</b> ★ <input type="text" value="California"/>	<b>Zip Code</b> ★ <input type="text" value="95526"/>	<b>County</b> ★ <input type="text" value="Humboldt"/>	

Enter information about the contact person for the cannabis cultivation site, their phone number, and email.

<b>Contact Person First Name</b> ★ <input type="text" value="Kathy"/>	<b>Contact Person Last Name</b> ★ <input type="text" value="Hall"/>
<b>Contact Person Telephone Number</b> ★ <input type="text" value="(707) 223-4898"/>	<b>Extension Contact Person Email</b> ★ <input type="text" value="manafarmsllc@gmail.com"/>

Phone extensions should only include numbers (no leading 'x').

**Assessor's Parcel Number(s) (APN):** Choose the parcels on which you are requesting Cannabis General Order Coverage. Coverage is required across contiguous parcels with any disturbed land or any land where land disturbance activities occur associated with cannabis cultivation activities.

Land disturbance activities include, but are not limited to, construction of roads, buildings, water storage areas; excavation, grading, and site clearing. Disturbed land includes cultivation areas, storage areas where soil or soil amendments (e.g., potting soil, compost, or biosolids) are located.

You will have the opportunity in Section D to confirm or edit the APN numbers selected.

<b>Parcels</b>	<input type="text" value="208-111-028-000"/>
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On the following page, you will be asked to provide address and contact information for the cultivator/diverter. Is the cultivator/diverter address and contact information the exact same as the address and contact information entered on this page (Cannabis Cultivation Site and Contact Information)? If you select yes, this will allow the system to copy the information so you do not need to re-enter it.

★  Yes  No

## Section C - Cultivator/Diverter Information

Provide legal name and mailing address of the person or entity cultivating cannabis and/or diverting water. Entities include businesses, corporations, limited liability corporations, etc..

Enter the legal name of the person or entity cultivating cannabis. If the cultivator is a private individual, enter the last name and then first name of the individual, separated by a comma and a space. (For example: Doe, John)

**Legal Name** ★

If you are providing a PO Box, enter the information, including the words 'PO Box' along with the box number, in the Street Name field. For suites and apartments, please type the appropriate abbreviation, *APT* or *STE* in addition to the unit number. For example:

APT 337 or STE 337 instead of just 337

<b>Street Number</b> <input type="text" value="504"/>	<b>Suite/Apt</b> <input type="text"/>	<b>Street Direction</b> **Pick One** <input type="text"/>	<b>Street Name</b> ★ <input type="text" value="2nd"/>	<b>Street Type</b> <input type="text" value="Avenue"/>
<b>City</b> ★ <input type="text" value="Rio Dell"/>	<b>State/Province</b> ★ <input type="text" value="California"/>	<b>Zip Code</b> <input type="text" value="95562"/>		
<b>Country</b> ★ <input type="text" value="USA"/>	<b>Foreign Postal Code</b> <input type="text"/>			

**Organization Type** ★

Privately-Owned Business

Enter information about the business contact person for the cultivator/diverter, their phone number, and email.

**Contact Person First Name**

★

**Contact Person Last Name**

★

**Contact Person Telephone Number**

★

**Extension Contact Person Email:** Future correspondence will be sent to this email address and the any third party representative you might delegate later in the application. ★

Phone extensions should only include numbers (no leading 'x').

**ACKNOWLEDGMENT OF FUNCTIONAL EMAIL ADDRESS:** ★

The email address above is accurate and this email address can be used for correspondence related to permitting information. Failure to receive pertinent documentation due to email inbox settings, email spam filters, lost passwords, or in some other way dysfunction email address is not an excuse for failure to meet regulatory obligations. It is the responsibility of the Discharger or Dischargers Authorized Representative to contact the appropriate Regional Board and/or the Division of Water Rights, which will be listed in the appropriate Notice of Receipt generated at the end of this application, to update this email address if it changes.

**Is your primary home residence located on the same property as the cannabis cultivation site?**

★  Yes  No

**On the following page, you will be asked to provide address and contact information for the property landowner. If the Property Landowner address and contact information is identical to the address and contact information entered on a previous page, please select the page name from the drop-down menu below. This will allow the system to copy the information so you do not need to re-enter it. Otherwise, select "Not the same."**

★ [Section C - Cultivator/Diverter Information](#)

## Section C - Property Landowner Information (1)

**Provide information on the property landowner where the cannabis will be grown. If there is a point of diversion for surface water on a property with no cultivation, you will have an opportunity to enter that landowner information later.**

Enter the legal name of the person or entity who owns the property on which the cannabis cultivation site is located. If the property landowner is a private individual, enter the last name and then the first name of the individual, separated by a comma and a space in the "Legal Name" field. For example: Doe, John

**Legal Name** ★

If you are providing a PO Box, enter the information, including the words 'PO Box' along with the box number, in the Street Name field.

**Street Number**

**Suite/Apt**

**Street Direction**

\*\*Pick One\*\*

**Street Name** ★

**Street Type**

Avenue

**City** ★

**State/Province**

★ California

**Zip Code**

**Country** ★ USA

**Foreign Postal Code**

**Owner Type** ★ Private-

Individual

Enter information about the contact person for the property landowner, their phone number, and email.

**Contact Person First Name**

**Contact Person Last Name**

★ Kathy

★ Hall

Contact Person Telephone Number

★ (707) 223-4898

Extension Contact Person Email

manafarmsllc@gmail.com

Phone extensions should only include numbers (no leading 'x').

In the following pages you will have the ability to enter additional property landowner addresses and contact information, if applicable. After the property landowner address and contact information pages, you will be asked to provide the address and contact information where legal notice may be served. If the legal notice address and contact information is identical to the address and contact information provided on a previous page, or the address and contact information you will provide for one of the additional property landowners, please select the page name from the drop-down menu below. This will allow the system to copy the information so you do not need to re-enter it. Otherwise, select "Not the same."

★ Cultivator/Diverter

Information



## Section C - Additional Property Landowner? (1)

Do you have additional property landowners to add? ★  Yes  No

## Section C - Address Where Legal Notice May Be Served

Enter an address where legal notice may be served. **NO P.O. BOX NUMBERS!**

Street Number

504

Suite/Apt

Street Direction

\*\*Pick One\*\*

Street Name ★

2nd

Street Type

Avenue

City ★ Rio Dell

State/Province

★ California

Zip Code

95562

Country ★ USA

Foreign Postal Code

Enter information about the contact person for legal matters, their phone number, and email.

Contact Person First Name

★ Kathy

Contact Person Last Name

★ Hall

Contact Person Telephone Number

★ (707) 223-4898

Extension Contact Person Email

manafarmsllc@gmail.com

Phone extensions should only include numbers (no leading 'x').

On the following page, you will be asked to provide address and contact information for billing. If the billing address and contact information is identical to the address and contact information provided on a previous page, please select the page name from the drop-down menu below. This will allow the system to copy the information so you do not need to re-enter it. Otherwise, select "Not the same."

★ Section C - Cultivator/Diverter

Information



## Section C - Billing Information

Enter the name and address where fee invoices should be sent.

Name ★ Mana Farms LLC

If you are providing a PO Box, enter the information, including the words 'PO Box' along with the box number, in the Street Name field. For suites and apartments, please type the appropriate abbreviation, *APT* or *STE* in addition to the unit number. For example:

APT 337 or STE 337 instead of just 337

<b>Street Number</b> 504	<b>Suite/Apt</b>	<b>Street Direction</b> **Pick One**	<b>Street Name</b> ★ 2nd	<b>Street Type</b> Avenue
<b>City</b> ★ Rio Dell		<b>State/Province</b> ★ California	<b>Zip Code</b> 95562	
<b>Country</b> ★ USA		<b>Foreign Postal Code</b>		

Enter information about the contact person for billing purposes, their phone number, and email.

<b>Contact Person First Name</b> ★ Kathy	<b>Contact Person Last Name</b> ★ Hall	
<b>Contact Person Telephone Number</b> ★ (707) 223-4898	<b>Extension</b>	<b>Contact Person Email</b> manafarmsllc@gmail.com

Phone extensions should only include numbers (no leading 'x').

## Section C - Third-Party Representative/Agent

I wish to designate a third party to represent me in issues related to the Cannabis Cultivation General Order.

★  Yes  No

Identify the third party (e.g., consultant) representing you in dealing with matters related to the Cannabis Cultivation General Order, if applicable.

Enter the legal name of the person or entity of your third-party representative. If the third-party representative is a private individual, enter the last name and then first name of the individual, separated by a comma and a space. For example: Doe, John

**Business Name** ETA Management Group LLC

If you are providing a PO Box, enter the information, including the words 'PO Box' along with the box number, in the Street Name field.

<b>Street Number</b> 1150	<b>Suite/Apt</b> 2	<b>Street Direction</b> **Pick One**	<b>Street Name</b> Evergreen	<b>Street Type</b> Road
<b>City</b> Redway		<b>State/Province</b> California	<b>Zip Code</b> 95560	
<b>Country</b> USA		<b>Foreign Postal Code</b>		

**Organization Type** Privately-owned business

Enter information about the contact person for the third party representative, their phone number, and email.

<b>Contact Person First Name</b> Vanessa	<b>Contact Person Last Name</b> Valare	
<b>Contact Person Telephone Number</b> (707) 923-1180	<b>Extension</b>	<b>Contact Person Email</b> etahumboldt@gmail.com

Phone extensions should only include numbers (no leading 'x').

## End of Section C

Use the following navigation buttons to return to the previous sections:

Introduction

Section A - Cannabis Cultivation General Order  
Eligibility Questions

Section B - Small Irrigation Use Registration Water  
Rights Screening

Section C - Cannabis Cultivation Site and Contact  
Information

You have completed Section C - Applicant and Property Information. Click 'Save and Continue' below to continue. Based on your previous responses, you may be directed to Section D - Cannabis Cultivation General Order, Section E - Water Rights, or the Submission Page next.

## Section D - Previously Enrolled Under Another Order?

Were the discharges of wastewater from the cannabis cultivation activities at the site/property listed on this application previously enrolled in General Waiver R1-2015-0023 or General Order R5-2015-0113?

  Yes  No

If you selected 'Yes' above, provide the following:

**WDID Number**

Your WDID number can be found on the Notice of Applicability transmitted to you by the Regional Water Quality Control Board when you enrolled under the General Order or General Waiver. **The North Coast Regional Board WDID will be in the format 1X1####CXXX (ex. 1D13456CWLZ) and the Central Valley Region Board WDID will be in the format 5X##MJ00### (ex. 5H23MJ00456) where X's are letters, 0 are zero's, and #'s are numbers.**

WDID validation list

## Section D - Discharge Information

Definitions of Slope, Riparian Setback, Cultivation Area and Disturbed Area can be found in Attachment A ([https://www.waterboards.ca.gov/water\\_issues/programs/cannabis/docs/cannabis\\_attach\\_a\\_clean\\_version.pdf](https://www.waterboards.ca.gov/water_issues/programs/cannabis/docs/cannabis_attach_a_clean_version.pdf)) of the Cannabis Cultivation General Order

**What is the maximum Slope**


([https://www.waterboards.ca.gov/water\\_issues/programs/cannabis/docs/cannabis\\_attach\\_a\\_clean\\_version.pdf#page=14](https://www.waterboards.ca.gov/water_issues/programs/cannabis/docs/cannabis_attach_a_clean_version.pdf#page=14)) of your site? 

- Slope is less than 20%
- Slope is greater than or equal to 20% and less than or equal to 30%
- Slope is greater than 30%

**Is all of the disturbed area outside of the Riparian Setback**

([https://www.waterboards.ca.gov/water\\_issues/programs/cannabis/docs/cannabis\\_attach\\_a\\_clean\\_version.pdf#page=13](https://www.waterboards.ca.gov/water_issues/programs/cannabis/docs/cannabis_attach_a_clean_version.pdf#page=13))?


Minimum Riparian Setback Table is included in Section 1, Requirement 37

([https://www.waterboards.ca.gov/water\\_issues/programs/cannabis/docs/cannabis\\_attach\\_a\\_clean\\_version.pdf#page=28](https://www.waterboards.ca.gov/water_issues/programs/cannabis/docs/cannabis_attach_a_clean_version.pdf#page=28)) 

- Yes
- No

**Enter the size of the Cultivation Area**

([https://www.waterboards.ca.gov/water\\_issues/programs/cannabis/docs/cannabis\\_attach\\_a\\_clean\\_version.pdf#page=5](https://www.waterboards.ca.gov/water_issues/programs/cannabis/docs/cannabis_attach_a_clean_version.pdf#page=5)) (in **square feet**)



**Enter the size of the Disturbed Area**

([https://www.waterboards.ca.gov/water\\_issues/programs/cannabis/docs/cannabis\\_attach\\_a\\_clean\\_version.pdf#page=10](https://www.waterboards.ca.gov/water_issues/programs/cannabis/docs/cannabis_attach_a_clean_version.pdf#page=10)) (in **square feet**):

Disturbed Area is the sum of the Cultivation Area plus any other area that is used for cannabis cultivation purposes like access road,



parking areas, storage area, etc. The definition of Cultivation Area and Disturbed Area can be found in Attachment A. Disturbed area must be greater than or equal to the cultivation area.

★

**Please select one of the following, which best describes your cannabis cultivation activities:** ★

- The cultivation occurs completely outdoors with no indoor cultivation component.
- The cultivation occurs both outdoors and indoors and all industrial wastewaters generated by the indoor cultivation is discharged to a community sewer system consistent with the sewer system requirements.
- The cultivation occurs both outdoors and indoors and irrigation tailwater, hydroponic wastewater, or other miscellaneous industrial wastewaters generated by the indoor cultivation is discharged to an on-site wastewater treatment system, to land, or to surface water.
- The cultivation occurs both outdoors and indoors and irrigation tailwater, hydroponic wastewater, or other miscellaneous industrial wastewaters generated by the indoor cultivation is discharged to an appropriate collection tank, and the wastewater in the collection tank is regularly collected by an authorized waste hauler who disposes of the wastewater to a community sewer system consistent with the sewer system requirements.

## Section D - Enrollment Determination

Based on the information provided you will be applying for coverage under the Cannabis Cultivation General Order as a Tier 1 Low Risk site. If you disagree with this determination please contact your Regional Water Quality Control Board after submitting this application.

## Section D - Site Coordinates and APN Confirmation

Use the map to select the geographic coordinates of the facility/cultivation site for which you are applying for coverage under the Cannabis Cultivation General Order. The coordinates shall be at the approximate center of the facility/cultivation area. Click the "Map" button to open the map. The map will open in a new window and will include instructions for selecting a site location.

★ <b>County</b>	<input type="text" value="Humboldt"/>	
★ <b>Lat/Long</b>	<input type="text" value="40.474018"/>	<input type="text" value="-123.764745"/>

If this screen does not show any coordinates or you receive an error upon closing the map window, click "Map" again and then close the map window without making changes. If you are still having problems with the map, click on the "Email for help on this page" link at the bottom of this page to request assistance.

Please confirm the APNs on which you will need Cannabis General Order Coverage.

If you have additional APNs, enter them here and separate each one with a comma.

## Section D - Certification of Compliance with BPTC Measures for Tier 1 and Tier 2

### Certification of Compliance with BPTC Measures in Attachment A

([https://www.waterboards.ca.gov/water\\_issues/programs/cannabis/docs/cannabis\\_attach\\_a\\_clean\\_version.pdf](https://www.waterboards.ca.gov/water_issues/programs/cannabis/docs/cannabis_attach_a_clean_version.pdf)) of the Cannabis Cultivation General Order



- I comply with the BPTC measures in Attachment A of the Cannabis Cultivation General Order.
- I currently do not comply with the BPTC measures in Attachment A of the Cannabis Cultivation General Order but I will complete improvements by the onset of the winter period, following submittal of this application, to achieve compliance.
- I currently do not comply with the BPTC measures in Attachment A of the Cannabis Cultivation General Order and I will not complete improvements by the onset of the winter period, following submittal of this application. I will contact the Regional Water Board to

establish a compliance schedule.

## Section D - Certification Under Penalty of Law for Cannabis Cultivation General Order



I certify that my cannabis cultivation complies with all applicable state, city, county, and local laws, regulations, ordinances, permits, and license requirements including, but not limited to, those for cannabis cultivation, grading, construction, and building.



I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

### Electronic Signature for Cannabis Cultivation General Order application

**Full legal name of the individual signing:**

Vanessa H.Valare

**Title of the individual signing: (e.g., Owner, Consultant, Cultivator)**

consultant

**Date of signature:**

01/28/2025

## End of Section D

Use the following navigation buttons to return to the previous sections:

Introduction

Section A - Cannabis Cultivation General Order  
Eligibility Questions

Section B - Small Irrigation Use Registration Water  
Rights Screening

Section C - Cannabis Cultivation Site and Contact  
Information

Section D - Currently Enrolled Under Another  
Order?

**You have completed Section D. Please click 'Save and Continue' below to continue with the application. Please note that depending on your previous responses, you may see Section E or the Submission Page next.**

## Submission Page

Use the following navigation buttons to return to the previous sections:

Introduction

Section A - Cannabis Cultivation General Order  
Eligibility Questions

Section B - Small Irrigation Use Registration Water  
Rights Screening

# SUBMISSION PAGE

NOTICE PURSUANT TO INFORMATION PRACTICES ACT OF 1977 (CIV. CODE. § 1798.17) The State Water Resources Control Board is requesting personal identifying information about the diverter/discharger and the person filing for this Small Irrigation Use Registration (SIUR) and coverage under the statewide General Waste Discharge Requirements and Waiver of Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities (General Order). The agency officials responsible for this system of records are Phil Dutton, Senior Engineer, whose business address is 1001 I Street, 14th Floor, Sacramento, CA 95814 and whose business telephone is (916) 341-5335, and Kevin Porzio, Senior Engineer, whose business address is 1001 I Street, 15th Floor, Sacramento, CA 95814 and whose business telephone is (916) 341-6914. Upon request, the agency official(s) shall inform an individual regarding the location of his or her records and the categories of any persons who use the information in these records.

The State Water Resources Control Board is empowered to require the submission of personal identifying information by California Water Code sections 1228 and 13260. The submission of the name, address, and phone number of the diverter/discharger and person filing for SIUR and General Order coverage is mandatory. The submission of the e-mail address of the diverter/discharger and person filing for SIUR and General Order coverage is voluntary. Failure to provide the mandatory information for SIUR coverage can result in the imposition of administrative civil liability in the amount of \$500 and an additional \$250 per day for each additional day on which the violation continues if the person fails to cure the violation within 30 days after the State Water Resources Control Board has called the violation to the attention of the person. Failure to provide the mandatory information for General Order coverage can result in the imposition of administrative civil liability in the amount of \$1,000 per day.

This personal identifying information is collected to facilitate better water management and waste discharge management by the State Water Resources Control Board. The State Water Resources Control Board will not automatically post personal identifying information to public databases. However, the State Water Resources Control Board may be legally required to disclose personal identifying information under any of the circumstances described in Civil Code, section 1798.24. Such circumstances may include, but are not limited to, responding to a request pursuant to the California Public Records Act or responding to a subpoena from a federal agency.

You have provided the information needed to complete this application. After you click on **Submit** you will see a summary of the information you have provided and will have the ability to save a pdf copy of your information.

The next step for completing your application is to pay any fees associated with this application and submit authorization from a Native American tribe (if needed).

**Cannabis Cultivation General Order Applicants:** should you have any fees due, you will be notified in the Notice of Receipt for Cannabis Cultivation General Order, which you can access upon submittal. To access your Notice of Receipt for the Cannabis Cultivation General Order, click on **Show Notice of Receipt for Cannabis Cultivation General Order as PDF** on the next page. The Notice of Receipt for Cannabis Cultivation General Order includes the fee amount and instructions on how and where to pay the fee.

**Water Rights Applicants:** should you have any fees due, you will be notified in the Notice of Receipt, which you can access upon submittal and will receive via email. To access your Notice of Receipt for Cannabis Small Irrigation Use Registration, click on **Show Notice of Receipt for Cannabis Small Irrigation Use Registration as PDF** on the next page. The Notice of Receipt includes the fee amount due as well as instructions on how and where to pay the fee.

**You can view a summary of your application before submitting by clicking here (</CGO/TakeSurvey/Summary?surveysTakenId=459336&surveyId=27>). The summary will open in a new tab. To return to this screen, simply close the tab with the application summary. If you need to make changes to your application, you may use the navigation buttons at the top of this page, or the Prev button below to navigate to previous pages. You will not be able to edit your application after you submit.**