

Gary Sobonya  
Dist 1

**Companies Offering Cannabis Surety Bonds**  
**Both approved by the Calif. State Dept. of Insurance**

**Surety Bond Authority, Inc.**  
**5850 Canoga Ave. #400 Woodland Hills, CA 91367**  
**800-333-7800**  
**suretybondauthority.com**

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MAY 7 2019

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**Continental Heritage Insurance Co.**  
**200 Park Ave.**  
**suite 400**  
**Orange Village, OH. 44122**  
**440-995-1420**  
**continentalheritage.com**

**IMPERVIOUS SURFACE LIMITATIONS TO PROTECT FROM OVER-DEVELOPMENT OF RURAL LANDS:**

**Land Use and Development Code L-II 2.3 E “Rural Districts Site Development Standards”**

<b>SITE DEVELOPMENT STANDARDS</b>	<b>AG</b>	<b>AE</b>	<b>FR</b>	<b>TPZ</b>	<b>L-II Section</b>
Maximum Impervious Surface	10%		5%		4.2.10

Under the existing Land Use and Development Code, L-II 2.3, the *total* impervious surface (including residence plus all accessory buildings), would be limited as shown below. However, the 25% of farm size for “support areas” places unduly extreme limits on buildings needed for farm operations, and at a *fraction* of what the County allows for development on rural lands and for other agricultural businesses.

<b>BUILDING LIMITS BY ACREAGE</b>	<b>AG</b>	<b>AE</b>	<b>FR</b>	<b>TPZ</b>
<b>Maximum Impervious Surface</b>	10%		5%	
2,500 sf farm, 5 – 9.99 acres	21,780 sf / 5 acres		10,890 sf / 5 acres	
25% Support Area, 2,500 sf farm	625 sf		625 sf	
5,000 sf farm, 10 – 19.99 acres	43,560 sf / 10 acres		21,780 sf / 10 acres	
25% Support Area, 5,000 sf farm	1250 sf		1250 sf	
10,000 sf farm 20+ acres	87,120 sf / 20 acres		43,560 sf / 20 acres	
25% Support Area, 10,000 sf farm	2500 sf		2500 sf	

NOTE that the “support area” also includes space for “immature plants”, which would typically be propagated outdoors, no impervious surface at all.

To envision a more equitable solution for limiting “support areas”, consider the following impacts at even up to 100% of garden size, and as compared to what the County currently allows for development of rural parcels and for other types of agricultural businesses.

<b>SUPPORT AREA</b>	<b>25%</b>	<b>50%</b>	<b>75%</b>	<b>100%</b>	<b>County Standard</b>
2,500 sf farm	625 sf	1250 sf	1875 sf	2500 sf	21,780 sf
5,000 sf farm	1250 sf	2500 sf	3750 sf	5000 sf	43,560 sf
10,000 sf farm	2500 sf	5000 sf	7500 sf	10,000 sf	87,120 sf

While the vast majority of farmers could not afford to develop 5000 or 10,000 square feet of buildings for their operations – even if they wanted to – the above illustrates the minimal impact of doing so. There is no risk for overdevelopment of rural lands, as the county defines it!

*Tracy Houston*

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## Please consider the following changes to the Draft Ordinance section 4. G. C. i and ii.

1. The Permitting Authority has the discretion to authorize construction of an Accessory Structure or Outdoor Garden at a distance less than 1000 feet from a state and/or federal Park if the following criteria are met:
  - i. the proposed site is at least 300 feet from the property line of the State or Federal Park; and
  - ii. the portion of the State or Federal Park that is adjacent to the Parcel or Premises upon which the Accessory Structure or Outdoor Garden is proposed to be constructed is inaccessible by the public and is unimproved.

The Permitting Authority has the authority to submit the application through the Planning Commission process for approval if, in his/her discretion, such approval is appropriate. Without a Variance

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## Sensitive Site Setback

Yuba River Organics LLC  
DBA: Yuba River Organics  
Small Outdoor – ADP

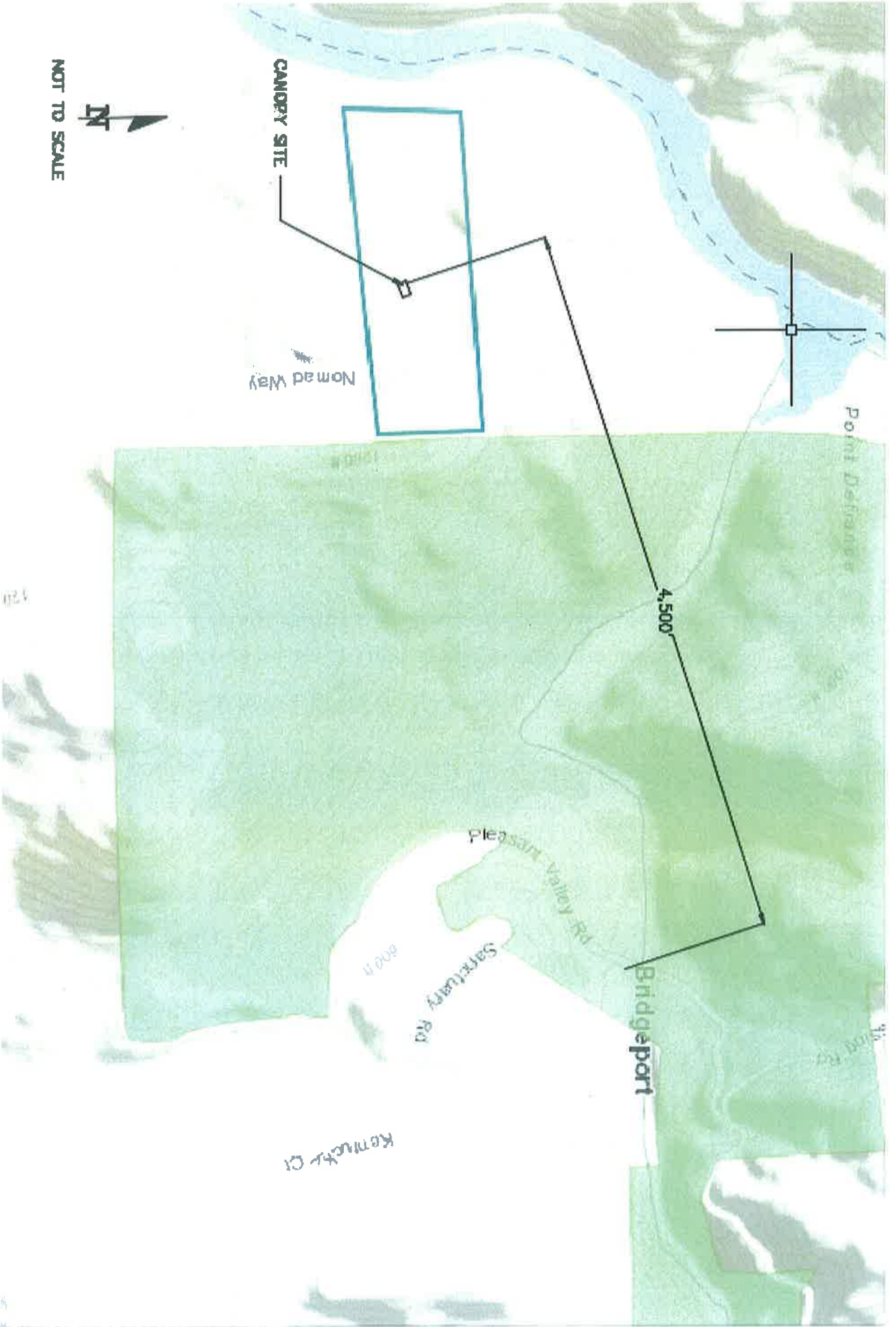
The property is the last parcel of land at the end of a dead-end road (Nomad Way). The proposed cultivation premises will be completely shielded from the public. The parcel is bordered by private property on the south side, inaccessible BLM land on the west and north sides, and an inaccessible portion of the South Yuba River State Park (“State Park”) on the east side.

While the property borders the South Yuba River State Park, the canopy area will be over 725 linear feet from the parcel boundary shared with the park. It is 4.2 mile (14-minute car drive) to the nearest parking area (~4,500 linear feet as the crow flies) within the park. The closest marked trail to the canopy area is over 3,200 linear feet away and separated by very steep slopes, thick forest and cliff bands.

This property is very well-suited for cannabis cultivation due to its secluded nature and remote characteristics. In addition to being over three quarters of a mile as the crow flies from the publicly used areas of the State Park, the natural topography provides additional assurance that the project will not have an impact on the public. No portion of the property is visible from anywhere on the State Park. The property is on the opposite (downward) slope side of the ridge dividing the parcels. Additionally, all other neighboring parcels will be unable to view the cultivation area. These aspects ensure that the public will be fully shielded from any cultivation activities.

The Draft Ordinance, section 4 G.- C. i. and ii. allows for consideration of Accessory Structures that neighbor State Park land under these types of unique circumstances (unimproved areas, inaccessible to the public and a with minimum setback). The Draft Ordinance left out language to include Outdoor Gardens in this section of the Ordinance. I would like to request the Section 4 G. – C. i and ii ad Outdoor Gardens well as Accessory Structures.

Please refer to the attached maps that show the property location, topography and approximate distance to the State Park.



NOT TO SCALE



CANDY SITE

Nomad Way

4.500

Bridgeport

Pleasant Valley Rd

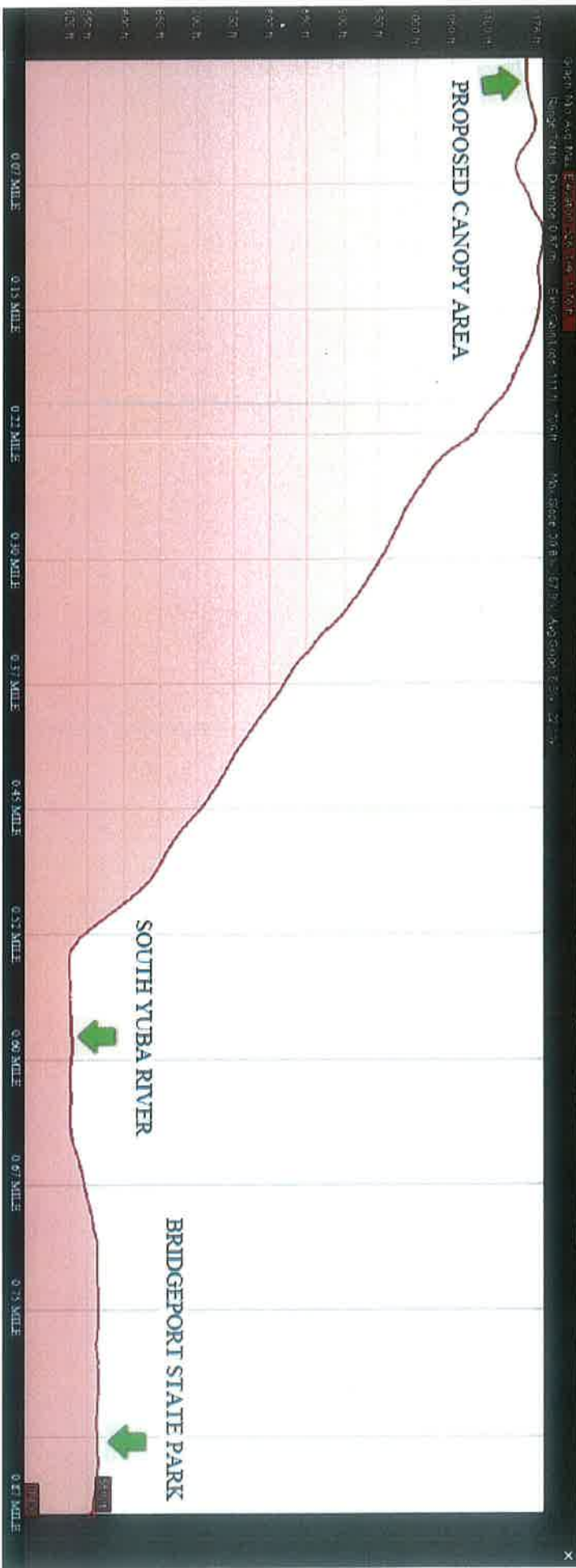
Safford Rd

Kenneth Ct

Point Defense

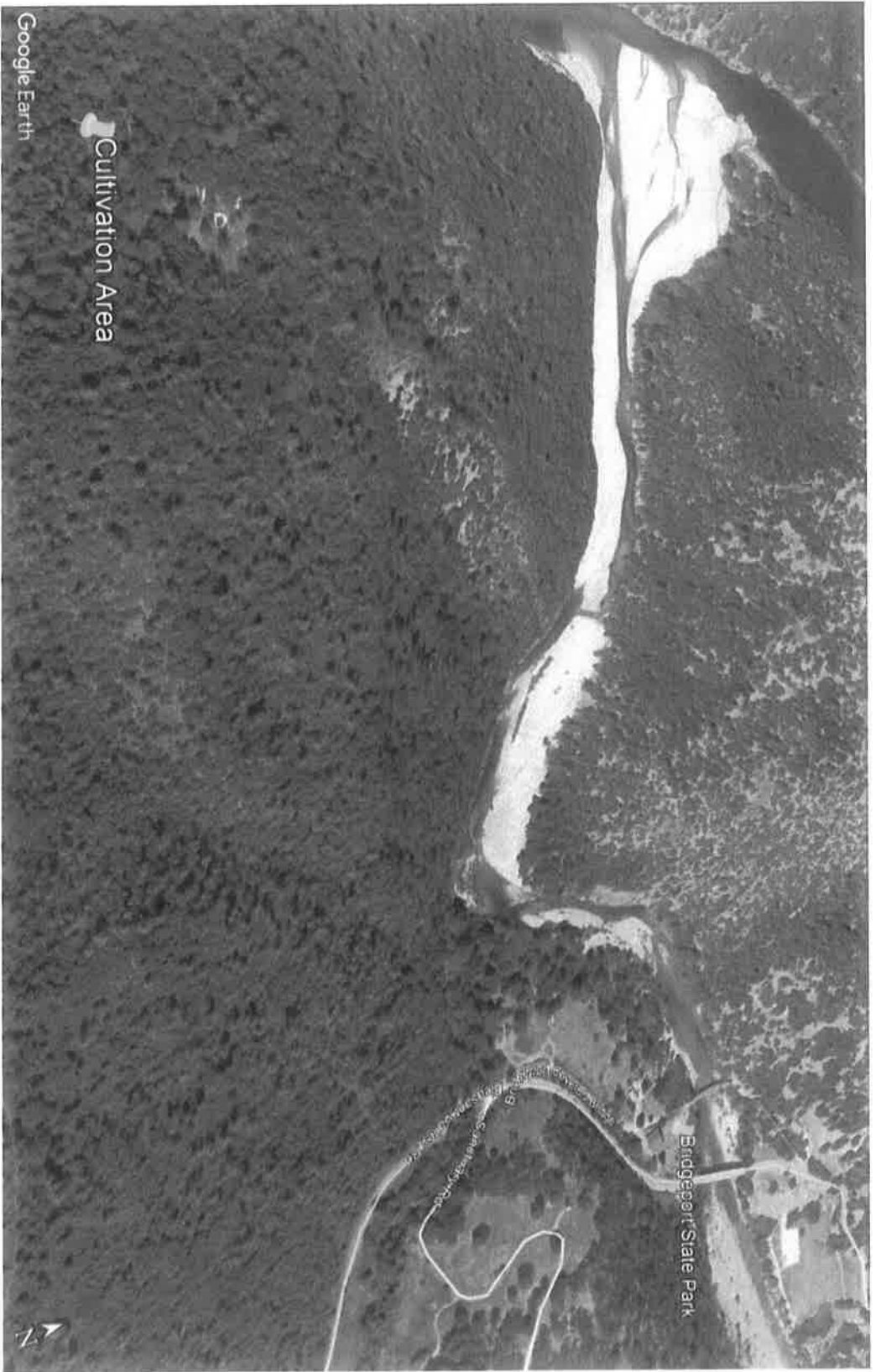


NOT TO SCALE



**NOTES:**

PROPOSED CANOPY AREA IS LOCATED APPROXIMATELY 4,500 FEET FROM THE SOUTH YUBA RIVER STATE PARK AS SHOWN IN THE ELEVATION PROFILE BELOW, THERE IS A RIDGE BETWEEN THE CANOPY AREA AND THE STATE PARK THE NATURAL TOPOGRAPHY SHIELDS THE CANOPY AREA FROM STATE PARK LAND. THE STATE PARK LAND IMMEDIATELY ADJACENT TO THE PROPERTY OF THE CANOPY AREA IS INACCESSIBLE TO THE PUBLIC DUE TO STEEP TOPOGRAPHY IN THE SOUTH YUBA RIVER CANYON. THE NEAREST PUBLIC ACCESS IS THE SOUTH YUBA RIVER WHICH IS LOCATED BEYOND 2,500 FEET FROM THE CANOPY AREA AND APPROXIMATELY 600 VERTICAL FEET BELOW THE CANOPY AREA. THE NEAREST MARKED TRAIL IS OVER 3,200 FEET FROM THE CANOPY AREA. THERE IS NO LINE OF SIGHT BETWEEN THE CANOPY AREA AND THE STATE PARK LAND THAT IS ACCESSIBLE TO THE PUBLIC.



Cultivation Area

Bridgport State Park

Sawtooth State Park

Google Earth