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Subject: App: PLN-11167-CUP, APN: 522-026-007
Date: Tuesday, October 3, 2023 8:30:01 AM

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Good Morning,

Please see the comments below regarding the above referenced project.

Project Number: PLN-11167-CUP

Project Name: Aloha Top Shelt

APN(s): 522-026-007

Project Description

A Conditional Use Permit for 35,000 square feet of outdoor commercial cannabis cultivation, with 3,450 square feet of ancillary propagation. Annual water usage is estimated at 190,000 gallons and sourced from a groundwater well. There are 17,000 gallons of existing water storage on-site with an additional 78,000 gallons of storage recommended by staff. Drying occurs within two 320 square foot storage containers with a proposed 2,400 square foot new building for drying. Trimming will occur off-site at a licensed processing facility. Power is provided by solar and no generators are used. The proposal includes restoration of previous cultivation areas.

CDFW COMMENTS:

Thank you for referring this application to the California Department of Fish and Wildlife (CDFW) for review and comment.

The following comments are intended to assist the Lead Agency in making informed decisions in the planning process. The following comments shall supersede prior comments submitted by CDFW regarding PLN-11491-CUP. CDFW requests that all comments are incorporated in the final Humboldt County Staff Report.

- The proposed project states that water will be sourced from an existing groundwater well. In drought years, CDFW have observed wells going dry in the area, including on this project parcel, and failing to yield water for the entire cultivation season. CDFW recommends, as a condition of project approval, that the applicant stores no less than 200,000 gallons of water on site to be used if the well does not produce for a full cultivation season.

- To minimize the risk of wildlife entrapment, CDFW requests, as a condition of project approval, the prohibition of synthetic netting (e.g., plastic or nylon) including photo or biodegradable plastic netting for the purpose of cultivation operations and/or erosion control.
- As a condition of the LSAA, the permittee has agreed to allow CDFW access to inspect and/or monitor the proposed work permitted in the agreement. The proposed project (PLN-11167-CUP) is located behind a locked community gate on Three Creeks Road that only landowners have access to. CDFW does not currently have access through the locked community gate without being escorted by the permittee. CDFW requests, as a condition of project approval, that reliable access through the community gate on Three Creeks Road be made available by the lead agency to CDFW that need access for inspections for unresponsive Permittees.

Thank you for the opportunity to comment on this project.

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