

DEPARTMENT OF TRANSPORTATION

DISTRICT 1, P. O. BOX 3700
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*Making Conservation
a California Way of Life.*

October 12, 2017

1-HUM-299-31.677
APN: 316-071-004
CUP# 16-210

Cannabis Planner on Duty (CPOD)
Planning & Building Department
County of Humboldt
3015 H Street
Eureka, CA 95501

Dear CPOD,

Thank you for giving Caltrans the opportunity to review and comment on the proposed Dillon Conditional Use Permit (CUP# 16-210), which requests a permit to allow a 43,560 square-foot outdoor cannabis cultivation and a request for an additional 22,000 square feet of mixed light cultivation. The driveway serving the subject parcel connects to State Route 299 at post-mile 31.67, approximately seven miles west of the State Route 299 (SR 299) junction with State Route 96. We offer the following comments:

- Recent aerial imagery shows significant vegetation removal for the purposes of roads and cannabis cultivation within 100 feet of an active landslide adjacent to SR 299. The loss of vegetation above this unstable geologic formation could potentially contribute toward additional slope instability and subsequent impacts to SR 299.
- Neither the application nor the referral provide adequate information about the original grade or changes in the natural grade that would enable us to identify risks for receiving concentrated storm water flows and/or downslope erosion. The County should ensure that grading permits have been issued for all on-site roads and clearings for cultivation purposes.
- We request that any vegetation removal that has occurred on the parcel without the benefit of Cal Fire review and permitting, be considered for revegetating with native species, particularly between the primary parcel driveway and the nearest headscarp of recently active landslides.
- To address our concerns related to concentration of storm water runoff and exacerbation of erosion and geologic instability, we request either that a geotechnical and soils report be prepared to identify suitable cultivation sites or that the County restrict all cannabis production-related activity on this parcel within a minimum setback of 300 feet from the existing break in slope above SR 299.
- The driveway connection to SR 299, which provides access to the subject parcel, was not

designed for commercial use. The initial private road connection on SR 299 was established as an access for timber management, which was permitted under the assumption that its use would be intermittent. The incremental increases in land use intensity from what has been timber stand management, increases the potential for impacts to traffic safety due to both the location and the as-built design of the existing access. The driveway should be paved to a minimum distance of 20 feet from the edge of shoulder, be widened to accommodate for two way traffic at the driveway throat, provide standard pavement tapers and flares, provide adequate corner site distance, and include acceptable curve radii. Due to the topography and other environmental constraints, we anticipate high costs for constructing a driveway connection to State standards within this section of SR 299.

- In order to re-construct the driveway to current standards, the applicant will need to demonstrate that all of the legal entitlements necessary to use the driveway have been granted by the owner of the driveway encroachment and across any and all intervening properties.
- In consideration of the above stated reasons, we request that the County consider either significantly reducing the amount of cultivation allowed on-site to avoid having to mitigate for traffic safety-related impacts to SR 299 or consider retiring the parcel for cannabis cultivation and relocating the use to a more suitable site. We request to be consulted with respect to any scaled reduction of on-site operations to maintain consistency with historic trip generation rates.
- Any work within Caltrans Right-of-Way will require an Encroachment Permit from Caltrans. Applications are reviewed for consistency with State standards and are subject to Department approval. To streamline the permit application and review process, we encourage the applicant to consult with our Permit staff prior to submitting an application. Requests for permit applications can be sent to: Caltrans District 1 Permits Office, P.O. Box 3700, Eureka, CA 95502-3700, or requested by phone at (707) 445-6389. For additional information, the Caltrans Permit Manual is available online at:
<<http://www.dot.ca.gov/hq/traffops/developserv/permits/>>.

Please contact me with questions or for further assistance at (707) 441-4693 or by email at:
<jesse.robertson@dot.ca.gov>.

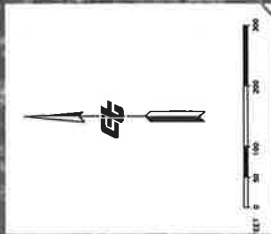
Sincerely,



Jesse Robertson
Transportation Planning
Caltrans District 1

NOTE: THE STATE OF CALIFORNIA HAS A POLICY OF OPEN PUBLIC RECORDS. ANY INFORMATION CONTAINED HEREIN IS UNCLASSIFIED AND IS BEING RELEASED TO THE PUBLIC.

All lands shown lother than that inside Highway 299 R/W are part of APN 316-071-004. R/W location shown is based on fitting record alignment to roadway alignment shown in the NAIP 2016 image.



STATE OF CALIFORNIA
CALIFORNIA STATE TRANSPORTATION AGENCY
DEPARTMENT OF TRANSPORTATION

**RIGHT OF WAY
WORK MAP APPROX. R/W
HUM 299 PM31.67**

TO DESIGN	EA#31	PROJECT PM	SHEET NO.	TOTAL SHEETS
01	HUM 299	31.67	1	1

PROJECT ID# 00 0000 0000

DATE	REVISIONS

