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Subject: App: PLN-11281-CUP, APN: 316-071-004
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Good Afternoon,

Project Number: PLN-11281-CUP

Project Name: Ghost Ship Investments - Existing cultivation 43,560 sq outdoor

APN(s): 316-071-004-000

CEQA: CEQA-2017-0560-R1

Project Description

Ghost Ship Investments - Existing cultivation 43,560 sq outdoor

A Conditional Use Permit for continued cultivation of 47,700 square feet (SF) of existing outdoor (13,960 SF of full-sun outdoor and 11,798 SF of outdoor utilizing light deprivation techniques) and 21,942 SF of existing mixed light cannabis, in addition to 4,777 SF of ancillary propagation. All water for cultivation is sourced from a permitted, confined aquifer well. Existing available water storage is 147,000 gallons in a series of hard-sided tanks. Estimated annual water usage is 346,500 gallons. Drying and curing occurs onsite in an existing multi-use shed, with all other processing occurring offsite at a licensed processing or manufacturing facility. Power is provided by five (5) generators, with long-term plans to switch to Pacific Gas and Electric Company (PG&E) power. No employees are required for the operation.

CDFW COMMENTS:

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

On November 28, 2023, CDFW staff conducted a site inspection at the subject property on Assessor' Parcel Number (APN) 316-071-004-000. During the site visit, staff walked the property to observe current and historic cultivation activities. 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-11281-CUP CDFW requests that all comments are incorporated in the final Humboldt County Staff Report.

- On July 13, 2023, CDFW determined that the applicant's project is not subject to the

notification requirements pursuant to Fish and Game Code (FGC) section 1602.

- While onsite, CDFW observed the unauthorized surface water diversion from a spring for the purpose of drinking water for onsite workers, which is a violation of FGC section 1602. CDFW requests, as a condition of project approval, that the applicant immediately removes the pipe, disassemble the small dammed spring, and restores the spring back to its natural condition.
- While onsite, CDFW observed the unauthorized discharge of grey water from two sinks used for domestic purposes to waters of the state, which is a violation of FGC section 5650. CDFW requests, as a condition of project approval, that the applicant immediately ceases to discharge to waters of the state and remove all pipes currently discharging into a water course. Further, CDFW requests, as a condition of project approval, that the applicant submit an updated plan and map that describes a water discharge plan for the housing on site.
- While onsite, CDFW observed a travel trailer used for housing employees located within 5 ft of a stream and on the edge of a steep slope, posing a threat to public trust resources. CDFW requests, as a condition of project approval, that all travel trailers onsite are located outside of the SMA.
- While onsite, CDFW observed discarded and unused waterlines below the cultivation sites on the parcel, posing a threat to sensitive wildlife species and public trust resources. CDFW requests, as a condition of project approval, that all unused waterline is removed and properly disposed of at a waste management facility.
- While onsite, CDFW observed uncontained compost and discarded soil associated with cannabis cultivation. CDFW requests, as a condition of project approval, that the applicant fully contains compost piles and all imported soil on site.
- While onsite, CDFW observed monofilament netting that was used during cannabis cultivation operations. 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.
- The project, as proposed, has the potential to impact the Northern Spotted Owl (NSO), a Threatened species pursuant to the California Endangered Species Act. At least one known NSO Activity Center occurs within 0.80 miles of the cultivation sites (CDFW 2023). CDFW requests, as a condition of project approval, that the permittee implements substantive containment of all generators on site, prior to utilizing the generators for cultivation, to minimize noise disturbance when in use.

- The project description states that the estimated annual projected water usage for the farm is approximately 346,500 gallons, which will be sourced from a single bedrock fracture groundwater well. The well completion report, completed by Watson Well Drilling, estimates that the well is expected to yield 10 GPM. However, the report suggests that the well yield over time may change and potentially decrease as well use continues. Due to the project's high projected water needs, CDFW requests, as a condition of project approval, that the applicant stores no less than 220,000-gallons of water on site to be used if the well does not produce for a full cultivation season.

Thank you for the opportunity to comment on this project.

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