



COUNTY OF HUMBOLDT

For the meeting of: 4/3/2025

File #: 25-439

To: Planning Commission

From: Planning and Building Department

Agenda Section: Consent

SUBJECT:

California Department of Fish and Wildlife, Cannibal Island Restoration Project Conditional Use Permit Assessor Parcel Numbers (APN): Portion of 310-021-003, 310-021-004, 310-033-004, 310-043-001, 310-043-003, 310-043-004, 310-043-005, 310-043-006, and 310-051-001

Record No.: PLN-2023-18855

Loleta area

Conditional Use Permit application for major restoration of Cannibal Island and the surrounding area in the Eel River estuary. Project components will include: removal of an abandoned two-story residential structure; deepening 5,000 linear feet of existing dikes and removal of failed culverts that currently separate full- and muted-tidal areas; reconnection of full tidal exchange to approximately 500 acres of former tidal marsh habitat and construction of inter-tidal lagoons with tidal marsh ridges and inter-tidal channels to create diverse tidal habitats, inset channel rock grade control will be placed along a 20-foot section of channel at the existing road cross along Senestraro Lane to provide passive management of the tidal prism; construction of a new earthen setback levee approximately 6,000 linear feet long, equipped with up to two gated culverts to separate tidal wetlands from agricultural lands; elevation of the existing road for approximately 2,500 feet and installation of up to four gated culverts; relocation of approximately 200,000 cubic yards of excavated sediment, to be reused within the project area; treatment and removal of Dense-flowered cordgrass; improvement of public access and visitor experience; and all post-construction management to maintain project objectives. The project will require a Coastal Development Permit from the California Coastal Commission.

RECOMMENDATION(S):

That the Planning Commission:

1. Adopt the resolution, (Attachment 1) which does the following:
 - a. Finds the project has been found to be exempt from environmental review pursuant to Section 21080.56 of the California Environmental Quality Act (CEQA) which provides a statutory exemption for certain restoration projects (SERP). A concurrence determination was made by the Director of the California Department of Fish & Wildlife (CDFW) on May 29, 2024

(Concurrence No. 21080.56-2024-051-R1); and

- b. Makes all the required findings for approval of the Conditional Use Permit; and
- c. Approves the California Trout, Inc. Cannibal Island Restoration Project Conditional Use Permit as recommended by staff subject to the conditions of approval (Attachment 1A).

DISCUSSION:

Project Location: The project site is located approximately three miles west of the town of Loleta, at the western-most extent of the Eel River delta and estuary approximately one mile inland and northeast of the Eel River mouth on the north side of the 3000 Block Cannibal Road.

Present General Plan Land Use Designations: Agricultural Exclusive (AE) and Natural Resources (NR), Humboldt Bay Area Plan.

Present Zoning: Agricultural Exclusive with a 60 acre minimum parcel size with combining zones for Coastal Wetland Areas, Flood Hazard Areas, Streams and Riparian Corridors Protection and Transitional Agricultural Lands (AE-60/W,F,R,T) and Natural Resources with a combining zone for Streams and Riparian Corridor Protection (NR/R).

Environmental Review: The project is exempt from environmental review pursuant to Section 21080.56 of the California Environmental Quality Act (CEQA) which provides a statutory exemption for certain restoration projects (SERP).

State Appeal: The project is not appealable to the California Coastal Commission.

Major Issues: Estuarine, riparian, and wetlands.

Monitoring Required:

None.

Executive Summary: California Trout Inc. in cooperation with California Department of Fish and Wildlife, and Northern Lands Program (Lead Agency) requests a Conditional Use Permit for major restoration of Cannibal Island and the surrounding area in the Eel River estuary. Wetland restoration and watershed management are conditionally permitted uses in both the Agricultural Exclusive (AE) and the Natural Resources (NR) zone district.

Project components will include: removal of an abandoned two-story residential structure; deepening 5,000 linear feet of existing dikes and removal of failed culverts that currently separate full- and muted-tidal areas; reconnection of full tidal exchange to approximately 500 acres of former tidal marsh habitat and construction of inter-tidal lagoons with tidal marsh ridges and inter-tidal channels to create diverse tidal habitats, inset channel rock grade control will be placed along a 20-foot section of channel at the existing road cross along Senestraro Lane to provide passive management of the

tidal prism; construction of a new earthen setback levee approximately 6,000 linear feet long, equipped with up to two gated culverts to separate tidal wetlands from agricultural lands; elevation of the existing road for approximately 2,500 feet and installation of up to four gated culverts; relocation of approximately 200,000 cubic yards of excavated sediment, to be reused within the project area; treatment and removal of Dense-flowered cordgrass; improvement of public access and visitor experience; and all post-construction management to maintain project objectives. The total Project area is 795 acres. The northern and western portion of the Project area (approximately 462 acres) is owned by the California Department of Fish and Wildlife (CDFW) and managed as part of the Cannibal Island Unit of the Eel River Wildlife Area. The remaining 332 acres are privately owned and border the southeast portion of the Project area. Approximately 220 acres of the private property are held in Wetland Conservation Easements by the Natural Resources Conservation Service Wetlands Reserve Easement Program. The project is being developed through collaboration between private landowners and multiple public agencies. The project site is located within the Coastal Zone within both the Coastal Commission's retained permit jurisdiction as well as the County's appeals jurisdiction. The applicant has requested a Consolidated Coastal Development Permit which is currently being processed by the Coastal Commission and applies to the entire project area.

Project construction will be phased into one (1) to two (2) construction seasons based on available funding, site conditions, and sequencing for earthwork with construction water management and County Road construction. Each season will span approximately June through the end of October, as feasible with dry weather and allowable permitting windows. Construction during the weekends will be subject to approval by the landowners and construction manager. It is anticipated that between eight and ten construction workers will be present at any given time. The number of motor vehicles is anticipated to be up to 30 per day.

PROJECT PURPOSE AND NEED

The primary goal of the Cannibal Island Restoration Project is to restore and expand natural estuarine functions and processes that promote recovery of habitat for native fish, invertebrates, wildlife, and plant species compatible with surrounding working lands and public access. To achieve this goal, the following objectives have been established by the Project partners:

1. Promote actions that are supported by sound and transparent technical information and consensus with landowners and land managers;
2. Restore natural functions and processes of tidal hydraulics, riverine inundation and sedimentation, tidal channel connectivity, and wetlands maintenance, by removing or modifying existing infrastructure;
3. Increase resiliency of existing agricultural lands to sea level rise by relocating or reestablishing drainage infrastructure compatible with adjacent public ownership and conservation easements;

4. Enhance native plant communities and promote expansion of rare plant habitat through control and treatment of dense-flowered cordgrass (*Spartina densiflora*) and replacement with native plant species;
5. Improve public access on the Cannibal Island Unit of the ERWA; and
6. Maintain opportunities for future reconnection of tidal slough channels outside the Project Area that are currently precluded by land ownership and natural physical constraints.

Historically, much of the Project Area was comprised of estuarine tidal marsh and a network of tidal channels, which extended from the mouth of the Eel River to the base of Table Bluff. Beginning in the late 1800s, the area was diked, isolated from tidal waters, and drained for agricultural purposes. A cultural resources investigation was completed for the Project Area by Roscoe & Associates, which provides a detailed account of the anthropogenic history of the area. In summary, in 1918, the Project Area became part of a Swamp Land Grant Patent deeded to the State of California. The Swamp Land Act of 1850 (9 Stat. 519) was a U.S. federal law that provided a mechanism for the transfer of federally held swamp lands to states who agreed to drain the land, turning it into productive agricultural properties. After major land conversions were completed, the area was dominated by dairy and cattle ranching, and farming for hay, beets, carrots, and corn among other crops. In 1968, the Fish and Game Commission adopted a portion of Cannibal Island into the 2,600-acre ERWA. In the 1980s, CDFW expanded the ERWA to today's current ownership.

The Project Area is largely isolated from estuary water levels by an earthen dike that was constructed for agricultural purposes. Culverts with tide gates were installed within the dike to prevent saltwater inflow and allow drainage or rainfall runoff outflow. The dikes have reduced the frequency of riverine flood and tidal inundation and consequent sediment accumulation throughout the Project Area, and as a result, the interior land elevations have subsided up to three feet relative to the exterior land elevations exposed to riverine and tidal suspended sediments. The remaining tide gates on culverts no longer function resulting in muted tidal exchange and gradual conversion of the low interior lands from freshwater pasture to tidal salt marsh vegetation. Additionally, portions of the existing earthen perimeter dike have been severely eroded in several locations. The failed tide gates and degraded dike system have created vulnerabilities to adjacent agricultural lands and infrastructure, including Cannibal Island Road, owned and maintained by Humboldt County.

The goal of the project is to modify and remove antiquated water control infrastructure (dikes, culverts, flood gates) to restore a natural tidal range to most of the Project Area. Full tidal range restoration is expected to promote recovery and maintenance of tidal marsh habitats that support native fish, invertebrates, wildlife, and plant species, while also enabling marsh elevations to keep pace with sea level rise. As mentioned previously, the lack of sediment deposition from fluvial and tidal sources, along with past land use, has resulted in subsidence, where the Project Area elevations

are lower than those open to fluvial and tidal sediment sources. The failed tide gates and breaches have resulted in the conversion of low elevation agricultural lands, within the muted tidal range, to convert back to salt marsh and tidal mudflat. However, tidal mudflat and salt marsh exist at lower elevations within the Project Area compared to areas subject to the full tidal range. The muted tidal range reduces the duration of tidal inundation at a given elevation, resulting in a shift in habitat elevation range. Within the Project Area, salt marsh species are found between elevation 4 and 6 feet whereas similar species will be found between 5 and 7 feet in areas open to the full tidal range. As sea levels rise, the muted tidal range will also shift to higher elevations, and the lack of sediment accretion will result in the conversion of salt marsh to mudflat at lower elevations and the migration of salt marsh to higher elevations currently under agricultural use. Additional breaches or culvert failures will result in a more rapid succession of this process. Restoring fluvial and tidal sediment dynamics in combination with retreating dikes, establishing a setback levee and raising Cannibal Island Road will provide future resiliency for the salt marsh to migrate vertically through increased sediment deposition while maintaining the footprint of existing agricultural land use and improving ingress and egress to recreational and working lands.

EEL RIVER ECOSYSTEM RESTORATION PROJECT COMPONENTS

The Project Area is at the western-most extent of the Eel River delta and estuary approximately one mile inland and northeast of the Eel River mouth. The Eel River estuary includes approximately 24 square miles of agricultural lands, wetlands, and estuarine channels that receive runoff from 3,700 square miles of the Eel River Basin. It is one of the most significant estuaries along the California coast, with a mosaic of tidal flats, sloughs, and seasonal wetlands that support resident and migratory birds (Grassetti et al. 2011). The estuary also provides habitat that supports a variety of fish and aquatic species. Remnant slough channels and streams were historically highly interconnected throughout the estuary, but were disconnected through reclamation activities to support agricultural land use. Within this landscape, Cannibal Island is located in the northern portion of the Eel River estuary and is bounded by Sevenmile Slough on the north and east, North Bay Slough on the west and Mosley Slough on the southwest (Figure 2-2 - Project Area). North Bay and Sevenmile Slough exhibit an unrestricted tidal range (full tidal), open to Pacific Ocean tides without dampening the range by water control structures (muted tide), along the entire western and northern Project Area boundaries. A water control structure and road crossing influence the tidal range in the portion of Sevenmile Slough along the eastern boundary of the Project Area.

The components of the proposed project include:

Demolish and Remove Abandoned Residential Structure - The abandoned two-story house in the northwest portion of the Project Area on CDFW property will be demolished and removed. The structure has been severely damaged and is uninhabitable. Material from the demolished structure will be hauled offsite for disposal. Following demolition, the site will be restored to salt marsh.

Lower Existing Dikes - Sections of the existing perimeter dike will either be left intact or lowered to the surrounding marsh plain elevation. Sections of the perimeter dike left intact will be used to maintain upland refugia and roosting habitat for shorebirds and waterfowl and to provide wave refraction during flood events. Portions lowered to a marsh plain elevation will be recontoured with varying flat, gradual slopes to provide transitional habitat and offset impacts to wetlands impacted by construction of a new setback levee. Large wood will be placed along some sections of lowered dikes to provide high tide refugia for wildlife and a break from wind generated waves coming from the north. Existing failed culverts located within these lowered sections will be removed and disposed of offsite.

Restore and Enhance Tidal Wetlands, Channels and Tidal Marsh Ridges - The dendritic channel network and salt marsh within the Project Area were historically connected to North Bay prior to reclamation. Reclamation and the associated reduction in the tidal prism resulted in a significant reduction in hydraulic exchange and the tidal channel network was reconfigured by filling tidal channels and excavating linear ditches for drainage efficiency purposes. Portions of the Project Area that were diked and drained for agricultural purposes are now lower in elevation than surrounding salt marsh open to the full tidal elevation range, due in part to ground subsidence from tectonic activity and oxidation. The lack of frequent tidal and river flooding has also minimized sediment accretion in these disconnected areas. Portions of the Project Area outboard of the perimeter dike that have been exposed to full tidal exchange and frequent river flooding have elevated over time due to sediment deposition. Restored and enhanced tidal channels in other areas of the Eel River estuary and Humboldt Bay have been effectively designed through local adaptation of tidal channel sizing relationships (depth and width) developed for San

Francisco Bay by Phillip Williams and Associates (Williams et al., 2002; Phillips Williams and Associates and Faber 2002). The tidal channel sizing relationships utilize the diurnal tidal prism, defined as the volume of tidal water contained between Mean Lower Low Water (MLLW) and Mean Higher High Water (MHHW) datums, to establish tidal channel geometry. The San Francisco Bay relationships were developed using channel measurements from tidal marshes where the marsh plain surface elevations were near the elevation of MHHW, as is typical in areas exposed to the full tidal range. A large proportion of the marsh plain in the Project Area, however, is located several feet below MHHW associated with the full tidal range of the Eel River Estuary and North Bay. The restored full tidal range and subsided marsh elevations within the Project Area could result in an unstable channel geometry with increased erosive forces associated with the increased tidal prism.

To address the issues associated with the subsided marsh and restored full tidal range, a modified procedure to develop the restored tidal channel dimensions was adopted utilizing historical channel geometry and alignments of historical flow line elevations, as indicated by culvert flow lines, likely placed at the bottom of historical channels. The San Francisco Bay relationships were used to establish preliminary depth and width geometry, then proportionally scaled based on the historical

flow line elevation and elevation of MHHW. The resulting cross section geometry, a five-point parabolic channel shape defined by two top of bank points located at MHHW, two bank toes, and a channel thalweg, was compared to historical tidal channels within the Project Area and showed a similar relationship for portions of the channel remaining below MHHW. To achieve the desired geometry within the subsided marsh elevations, a tidal marsh ridge is needed. The tidal marsh ridge utilizes excavated material on-site to fill the elevation between the existing subsided marsh and MHHW, then is graded with a gradually slope back to the subsided marsh plain. Restored and new channels will be established to increase tidal exchange to approximately 500 acres of restored tidal wetlands. The increased tidal range and high fluvial flows will overtop the tidal marsh ridges and increase deposition of fine sediments across the subsided marsh surfaces to allow the marsh to accrete sediment over time. Placement of ¼ ton rock will occur along a section of channel to provide grade control to manage the tidal prism. This grade control is anticipated to be beneficial to manage tidal prism until the site elevations increase to be representative of a system with full tidal amplitude, which is expected to occur over 10-20 years. The rock would be placed over a 20-foot-long section where a former road crossing is located and failing culvert is proposed for removal. This area is a suitable location for the inset channel grade control because it likely already contains compacted sediment (from previous infrastructure), and will be disturbed via the road crossing and culvert removal anyway.

Marsh areas will be graded to provide habitat variability and increased complexity, promoting sediment accretion in subsided areas through a network of inter-tidal lagoons separated by hummocks and tidal marsh ridges. The network of sloughs and terminal ponds will provide diverse sub-, inter- and supra-tidal habitats. New brackish water ponds for aquatic species will also form by utilizing existing depressions in the marsh plain. Tidal marsh ridges will be utilized to create new small terminal ponds and alongside channels to improve upon and diversify the existing channel network, providing low energy perennial ponding areas and natural accumulation of woody debris to create suitable habitat for tidewater goby and other aquatic species. The lagoons will passively evolve into inter-tidal salt marshes with sediment accretion from the Eel River over time, providing diverse habitats of mudflat, salt marsh, and subtidal channels. Wood habitat structures will be integrated into the final design in select locations to supplement the natural accumulation of woody debris on the landscape. Invasive species removal and revegetation with native wetland vegetation will occur as a part of the restoration work and ongoing site management.

New Setback Levee - A 6,000 ft setback levee will be constructed along the eastern edge of the salt marsh to protect the remaining agricultural lands and provide maintenance access for water control structures. New fencing will be installed on the east side of the setback levee to keep livestock from trampling the setback levee. The top surface of the setback levee will be constructed at approximately 11 ft elevation (NAVD88) and graveled for vehicle access. Onsite sediment will be used to construct the setback levee. This elevation will prevent tidal inundation onto agricultural lands while not altering Eel River floodplain flow-paths. The setback levee will include a series of drainage culverts equipped with flood gates (two gated culverts are proposed). The gates will prevent tidal

inundation onto the agricultural land and will open when the inboard rainfall runoff water levels are higher relative to outboard, which will typically occur daily during and following rainfall events, providing drainage from adjacent agricultural land.

Elevate Cannibal Island Road - Cannibal Island Road within the Project Area routinely floods during winter months due to its low elevation that ranges from approximately 7 to 11 feet elevation (NAVD88). Given the high sediment loads during winter floods, the road shoulder and land adjacent to the road has elevated over time; however, the paved surface has not, as the sediments are scraped off the pavement following depositional events, thereby resulting in prolonged periods of ponded water over the roadway during winter months. The Project proposes to elevate approximately 2,500 linear feet of Cannibal Island Road between the Mosley Slough

bridge approach and the driveway on the eastern side of the Project Area to an approximate elevation of 11 feet (NAVD88) matching the proposed set-back dike elevation and the existing road elevations at the western and eastern project limits. Elevating the road will enhance access to recreational facilities at the western end of Cannibal Island Road and improve emergency ingress and egress during winter storm events and prolonged wet weather, as well as prevent tidal inundation over the County Road and on agricultural lands to the south. The elevation of the roadway will not alter existing flood paths or increase peak flood elevations on adjacent properties. The elevated road prism will include a series of drainage culverts equipped with flood gates (four gated culverts are proposed). The gates will prevent tidal inundation onto the agricultural land to the south and will open when the water levels south of the road are higher relative to north of road which will typically occur daily during and following rainfall events, providing drainage from adjacent agricultural land. The elevated road width will be similar to the existing road width. New fencing is proposed along both sides of the portion of Cannibal Island Road to be elevated.

Beneficial Re-use of Sediment - Project construction requires approximately 200,000 cubic yards of balanced excavation and sediment placement. The Project will balance the cut and fill volume on-site through beneficial reuses. Excavated sediment will be reused on site and will not be hauled off-site for disposal. Proposed onsite reuses include construction of the new setback levee, and construction of tidal marsh ridges, hummocks, and marsh plain fill.

Treatment of Dense-Flower Cordgrass - Dense-flowered cordgrass (*Spartina densiflora*) will be treated within the Project Area during implementation, and follow-up treatment post-implementation is anticipated. The methods utilized to control dense-flowered cordgrass will be carried out using a series of treatments implemented over time based on season, weather, tides, labor availability, and other factors. Proposed treatment methods are generally consistent with those outlined in the Humboldt Bay Regional Spartina Eradication Plan (H.T. Harvey 2013). The descriptions of these methods below are derived, in part, from the Programmatic Final EIR for the Humboldt Bay Regional Spartina Eradication Plan (H.T. Harvey 2013 and GHD 2013). Top mowing, grinding, tilling, excavation, flaming, and herbicide application will be utilized to control dense-

flowered cordgrass.

Public Access Improvements - Access to the Project Area is currently limited. Properties that are privately owned by Hansen and Pedrazzini are managed for livestock grazing. Properties managed by CDFW allow public access but lack amenities and signage. A variety of minor public access improvements are proposed to direct visitors to appropriate publicly accessible locations and to improve visitor experience and public access opportunities on CDFW property.

The existing turn-out at the intersection of Senestraro Lane with Cannibal Island Road will be converted to a trailhead parking lot. The parking lot will accommodate up to eight (8) parking stalls and include signage with trail maps to inform visitors of the areas dedicated for public access. A new trail will extend from the parking area approximately 2,000 feet north along Mosely Slough and will terminate at an impassible slough channel, providing an “out-and-back” user experience. Interpretative signs along the trail will inform users of the natural history of the Eel River estuary. The trail will be graded, surfaced with gravel and will be wide enough to serve as an accessway for vehicles and other equipment. No access for recreation is proposed outside of the CDFW portion of the Project Area. Under current conditions, the lack of a formal parking area limits the number of visitors to the CDFW property. The proposed parking area will accommodate a potential increase in visitors. On average 5-8 visitors per day or 2,920 per year are anticipated with some fluctuation based on the seasonality of recreational and hunting opportunities.

The subject properties are planned Agriculture Exclusive and Natural Resources in the Eel River Area Plan. The proposed project is for major restoration of Cannibal Island and the surrounding area in the Eel River estuary. All of the proposed work will require a Coastal Development Permit (CDP) from the California Coastal Commission (CCC). The project will enhance wildlife habitats and protect agricultural lands for long term agricultural use. Approximately 44.4 acres of Prime Agricultural Land exists within project area. Under the Project, these areas would not be converted out of Prime Agricultural Land, rather the agricultural productivity is anticipated to increase in these areas due to the installation of a complementary set-back levee which would reduce flooding and saltwater impaction to these Prime Agricultural Lands. Therefore, despite the defined land conversion, no net loss of agricultural productivity will occur in the project area, and in fact, a net increase is anticipated. For these reasons, the project is consistent with the land use designations of Agriculture Exclusive and Natural Resources.

The proposed project, including watershed management, fish and wildlife habitat management, and wetland restoration is consistent with the uses allowed under the ERAP and with uses that are allowed in Environmentally Sensitive Habitat Areas (ESHA). The proposed Project would not conflict with the ERAP because management for watershed, and management for fish and wildlife habitat are considered compatible with agricultural operations under the ERAP. The impacts of the restoration actions have been determined to be less than significant with the identified mitigation measures implemented.

The project is within the historic aboriginal territory of the Bear River Band of the Rohnerville Rancheria, Blue Lake Rancheria, and the Wiyot tribe. The project was referred to the Tribal Historic Preservation Officers for each of the tribes in December of 2023. A Cultural Resource Investigation was performed by Rocsoe and Associated in January of 2021. The Investigation resulted in the discovery of four (4) newly identified resources and one (1) previously documented resource within the current project area. All of the resources are associated with the historic-era built environment and no artifacts, features or sites associated with Wiyot use were found. Per the request of the Bear River Band recommendation, the project will adhere to the standard inadvertent discovery protocol in the event of inadvertent discovery of resources, as requested by the Bear River Tribal Historic Preservation Officer in September 2019, which has been incorporated into the project as an informational note (**Informational Note 3**).

OTHER AGENCY INVOLVEMENT:

It should be noted that many other State and Federal Agencies have separate permit requirements. The applicant has worked diligently with the other agencies coordinating project approval such that any and all other required permits are obtained prior to the start of the project. Some of the other involved agencies involved include the County of Humboldt, California Coastal Commission, North Coast Regional Water Quality Control Board, U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service (USFWS), National Oceanic and Atmospheric Administration (NOAA), and the Natural Resource Conservation Service. Other agency outreach included the Coastal Conservancy and Bureau of Land Management.

RECOMMENDATIONS:

Based on a review of Planning Division reference sources and comments from all involved referral agencies, staff is confident that the applicant has submitted evidence in support of making all of the required findings for approval of the Conditional Use Permit. Staff recommends that the Planning Commission find the project exempt from further environmental review pursuant to Section 21080.56 of the State CEQA Guidelines which provides a statutory exemption for certain restoration projects (SERP).

ALTERNATIVES TO STAFF RECOMMENDATIONS:

The Planning Commission could elect to add or delete conditions of approval. The Planning Commission could deny approval if unable to make all the required findings. Staff has concluded the required findings in support of the proposal can be made. Consequently, staff does not recommend further consideration of these alternatives.

ATTACHMENTS:

1. Draft Resolution
 - A. Conditions of Approval

- B. Operation and Maintenance Plan
 - C. Site Plans
 - D. Site Figures
 - E. Pre-project Site Conditions
2. Applicant's Evidence in Support of the Required Findings
- A. Wetland Delineation
 - B. Wetland Fill Analysis
 - C. Biological Study
 - D. Botanical Study
 - E. Habitat Conservation Analysis
 - F. Agricultural Resource Assessment
 - G. Soils Report
 - H. Soils Analysis Report
 - I. Restoration Plan
3. Referral Agency Comments and Recommendations
- A. County Division of Environmental Health
 - B. County Department of Public Works - Land Use
 - C. Pacific Gas and Electric

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