

**From:** [Kamoroff, Corrina@Wildlife](mailto:Kamoroff,Corrina@Wildlife)  
**To:** [Whitney, Andrew](mailto:Whitney,Andrew)  
**Cc:** [Johnson, Cliff](mailto:Johnson,Cliff); [Manthorne, David@Wildlife](mailto:Manthorne,David@Wildlife)  
**Subject:** PLN-11674-CUP, APN: 216-026-013  
**Date:** Tuesday, February 6, 2024 11:13:47 AM

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Good Morning,

Please see the comments below regarding the above-referenced project.

**Project Number:** PLN-11674-CUP

**Project Name:** Great Expectations Inc. - Existing 33,072 sf OD

**APN(s):** 216-026-013

**CEQA No:** CEQA-2018-0221-0000-R1

### **Project Description**

Great Expectations Inc. - Existing 33,072 sf OD

A Conditional Use Permit for 33,072 square feet of existing outdoor cannabis cultivation operation. Irrigation water is sourced from a rainwater catchment pond (600,000-gallon capacity), Water storage is a rain catchment pond and hard sided tanks with a total capacity of 688,000 gallons. Drying/curing of harvested cannabis to occur within an on-site shed. All processing activities occur at a licensed facility off-site. Power provided by PG&E.

### **CDFW COMMENTS:**

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

On January 25, 2024, CDFW staff conducted a site inspection at the subject property on Assessor' Parcel Number (APN) 216-026-013. During the site visit, staff walked the property to observe current, historic, and proposed 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-11674-CUP. CDFW requests that all comments are incorporated in the final Humboldt County Staff Report.

- A final Lake and Streambed Alteration Agreement (LSAA, 1600-2019-0484-0000-R1) was issued to the applicant on November 22, 2019, to maintain and use two points of diversion (PODs) and to upgrade and maintain six stream crossings.

While onsite, CDFW observed a stream crossing that is not listed in the current LSAA, that will need to be upgraded and maintained. The Permittee will be required to submit a minor amendment to the LSAA to improve this crossing that is currently not functioning adequately to convey stream flow. Additionally, the applicant/permittee does not have water meters on site and has not submitted all required reporting. As a result, the applicant is out of compliance with measures of the LSAA. CDFW requests, as a condition of approval, that the applicant/permittee completes the following items listed by February 29, 2024, or within two weeks of project approval, and achieves and maintains compliance with the LSAA.

- Submit a minor amendment to the LSAA to include upgrading and maintaining the additional Class III stream crossing as a project on the LSAA.
  - Install water meters on site as required in the LSAA for the two PODs.
  - Submit a Site Management Plan for CDFW review and approval.
- While onsite, CDFW observed that the lower cultivation site is located within the Streamside Management Area (SMA) of a Class III stream and wetland area. CDFW requests, as a condition of approval, that the applicant removes all cannabis cultivation and cultivation related infrastructure that is located within the SMA. CDFW further requests, as a condition of approval, that the applicant submits and implements a Restoration and Revegetation Plan to restore the habitat within the SMA of the Class III stream and wetland.
- While onsite, CDFW observed unused waterline scattered throughout the parcel, including waterline located within stream channels, posing a threat to sensitive wildlife species and public trust resources. CDFW requests, as a condition of approval, that all waterline is removed from stream channels and that all unused waterline is cleaned up and properly disposed of at a waste management facility.
- While onsite, CDFW observed road fill that has been pushed into the SMA of a Class II stream. CDFW requests, as a condition of approval, that the applicant remove all road fill from the SMA by February 29, 2024, or within two weeks of project approval.
- The Project Description states that irrigation water is sourced from a rainwater catchment pond. While onsite, CDFW observed that the rainwater catchment pond was installed without an appropriately constructed spillway. CDFW requests, as a condition of approval, that the spillway is lowered to allow for a minimum of 2 feet of freeboard, rocked and routed into settling basins or bioswales that discourages channelization and promotes dispersal and infiltration of flows.
- While onsite, CDFW observed uncontained compost and soil associated with cannabis

cultivation. CDFW requests, as a condition of approval, that the applicant fully contains compost piles and all imported soil on site.

Thank you for the opportunity to comment on this project.

**Corrina Kamoroff**

Environmental Scientist  
Habitat Conservation and Planning  
Humboldt/Del Norte LSA Program  
California Department of Fish and Wildlife  
619 Second Street  
Eureka, CA 95501