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From: Kamoroff, Corrina@Wildlife <Corrina.Kamoroff@Wildlife.ca.gov>
Sent: Wednesday, September 6, 2023 1:43 PM
To: Sutfin, Devin
Cc: Manthorne, David@Wildlife; Johnson, Cliff
Subject: Apps: PLN-11929-SP, APN: 212-311-002-000

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Good Afternoon,

Please see the comments below regarding the above referenced project.

Project Number: PLN-11929-SP

Project Names: Georgi Stoyanov - CUP for 9,975 Existing Outdoor Cultivation

APN(s): 212-311-002-000

Project Description

A Special Permit for 9,975 square feet of existing outdoor cannabis cultivation. Water for irrigation is provided by a permitted well (18/19-1052). Applicant estimates approximately 132,000 gallons of water is required to reach operational needs. Water storage is currently 5,900-gallons in hard tanks. Processing takes place onsite, including trimming and packaging. No additional employees are proposed. Electricity is sourced from PGE.

CDFW COMMENTS:

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

On September 6, 2023, CDFW staff conducted a site inspection at the subject property on Assessor' Parcel Number (APN) 210-212-311-002-000. 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-11929-SP. CDFW requests that all comments are incorporated in the final Humboldt County Staff Report.

- During the site visit on September 6, 2023, CDFW observed the upper cultivation site to be highly invaded by Yellow starthistle (*Centaurea solstitialis*). It appears that erosion control materials that were previously used onsite contained Yellow starthistle, which has likely contributed to the extensive propagation of the invasive species. Additionally, uncontained soil on site is currently contributing to the uncontrolled propagation of the Yellow starthistle. CDFW requests, as a condition of project approval, that an invasive species removal and monitoring plan is prepared and submitted to prevent the continued spread of the Yellow starthistle. Additionally, CDFW requests, as a condition of project approval, that the applicant fully contain all imported soil onsite and that all discarded soil is removed and properly disposed of at a waste management facility.

- During the site visit on September 6, 2023, CDFW observed trash and infrastructure associated with an old drying/processing site. CDFW requests, as a condition of project approval, that all infrastructure and debris associated with the drying/processing area is removed and properly disposed of at a waste management facility.
- There does not appear to be enough water storage to support the proposed cultivation on the parcel. CDFW recommends, as a condition of project approval, that applicant stores no less than 50,000 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.

Corrina Kamoroff

Environmental Scientist

Habitat Conservation and Planning

Humboldt/Del Norte LSA Program

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