

**From:** [Whitney, Andrew](#)  
**To:** [Kamoroff, Corrina@Wildlife](mailto:Kamoroff_Corrina@Wildlife)  
**Subject:** RE: PLN-11590-CUP, APN: 208-113-008-000 Wetland Delineation  
**Date:** Friday, August 9, 2024 4:24:00 PM

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Thank you, Have a nice weekend!

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**From:** Kamoroff, Corrina@Wildlife <[Corrina.Kamoroff@Wildlife.ca.gov](mailto:Corrina.Kamoroff@Wildlife.ca.gov)>  
**Sent:** Friday, August 9, 2024 2:16 PM  
**To:** Whitney, Andrew <[awhitney2@co.humboldt.ca.us](mailto:awhitney2@co.humboldt.ca.us)>  
**Subject:** RE: PLN-11590-CUP, APN: 208-113-008-000 Wetland Delineation

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Hi Andrew,

Thank you for sending over the Wetland Delineation report for PLN-11590-CUP for review. I have no additional comments or questions as this time.

Thank you,

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**From:** Whitney, Andrew <[awhitney2@co.humboldt.ca.us](mailto:awhitney2@co.humboldt.ca.us)>  
**Sent:** Thursday, August 8, 2024 2:12 PM  
**To:** Kamoroff, Corrina@Wildlife <[Corrina.Kamoroff@Wildlife.ca.gov](mailto:Corrina.Kamoroff@Wildlife.ca.gov)>  
**Subject:** FW: PLN-11590-CUP, APN: 208-113-008-000 Wetland Delineation

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Hello Corrina, We received this wetland delineation for the above referenced project. The results of the delineation are summarized as follows:

Based on the findings of the wetland delineation, the project area is considered a non-wetland area under the definition provided in the U.S. Army Corps of Engineers Wetlands Delineation Manual (USACE, 1987).

Based on these results, the applicant has provided a basis for approval with conditions. Please let me know if you have additional comments or questions.

Thank you,

Andrew

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**From:** Kamoroff, Corrina@Wildlife <[Corrina.Kamoroff@Wildlife.ca.gov](mailto:Corrina.Kamoroff@Wildlife.ca.gov)>  
**Sent:** Monday, August 14, 2023 3:52 PM  
**To:** Sutfin, Devin <[dsutfin1@co.humboldt.ca.us](mailto:dsutfin1@co.humboldt.ca.us)>  
**Cc:** Manthorne, David@Wildlife <[David.Manthorne@wildlife.ca.gov](mailto:David.Manthorne@wildlife.ca.gov)>; Johnson, Cliff <[CJohnson@co.humboldt.ca.us](mailto:CJohnson@co.humboldt.ca.us)>  
**Subject:** PLN-11590-CUP, APN: 208-113-008-000

**Caution:** This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Hi Devin,

Please see the comments below regarding the above referenced project.

**Project Number:** PLN-11590-CUP

**Project Name:** Goddess Organics, LLC CUP for existing 28,466 sf outdoor cultivation

**APN(s):** 208-113-008-000

A Conditional Use Permit for 28,625 square feet (SF) of existing commercial cannabis cultivation (including 11,500 SF of mixed light and 17,125 SF of outdoor cultivation) and 2,850 SF of ancillary propagation. Irrigation water is sourced from an offsite stream diversion (APN 210-241-005), two groundwater wells, and rainwater catchment in a proposed 400,000-gallon pond. Existing available water storage is 62,000 gallons in a series of hard-sided tanks, and there will be 462,000 gallons of onsite water storage with development of the proposed pond. Estimated annual water usage is 270,500 gallons. Processing occurs onsite. A maximum of fifteen (15) employees will be required during peak operations. Power is provided by three (3) generators and supplemented by solar; however, the applicant plans to fully convert to solar by the end of 2025. A Special Permit is also requested for development within the Streamside Management Area (SMA) for continued use and maintenance of the point of diversion infrastructure.

**CDFW COMMENTS:**

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

On August 8, 2023, CDFW staff conducted a site inspection at the subject property on Assessor' Parcel Numbers (APNs) 208-113-008-000. 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-11590-CUP. CDFW requests that all comments are incorporated in the final Humboldt County Staff Report.

- The proposed project includes construction of a 400,000-gallon rainwater catchment pond that will be used for irrigation. During the site visit, CDFW observed vegetation present at the proposed pond site that is indicative of wetland habitat. Prior to approval to construct a pond, CDFW requests that a Wetland Delineation is completed at the proposed pond site by a qualified professional. If the construction of the proposed pond will disturb an existing wetland, the pond construction should avoid impacts to any wetlands on site. Additionally, the county has indicated that, as a condition of approval, the county will require grading plans for the proposed rain catchment pond. CDFW recommends that projects that will require grading have grading plans developed prior to project decision so that impacts to fish and wildlife can be fully assessed.
- The estimated annual water usage of 270,500 gallons appears to underestimate the total amount of water needed and does not include domestic use or other uses associated with the proposed working quarters or other industrial uses. If the rainwater catchment pond is not constructed, CDFW recommends, as a condition of project approval, that applicant stores no less than 250,000 gallons of water on site to be used if the well(s) does not produce for a full cultivation season.
- 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 0.6 miles of the cultivation site (CDFW 2023). If the Humboldt County Planning Department (HCPD) elects to move this project forward, CDFW requests that that any ground-breaking or construction activities should be limited to occur outside of the breeding season for NSO (March 1 through July 10). Additionally, CDFW requests that the permittee implements substantive containment of all back-up generators to minimize noise disturbance when in use.
- During the site visit conducted on August 8, 2023, CDFW observed uncontained fertilizer and pesticides that potentially pose a threat to wildlife. CDFW requests, as a condition of approval, that the applicant properly stores all fertilizers, pesticides, and chemicals on site.
- During the site visit, CDFW observed an uncovered soil pile, and infrastructure associated with historic cannabis cultivation that previously occurred on the parcel. CDFW requests, as a condition of approval that the applicant, fully contain all imported soil located onsite and that all discarded soil and trash be removed and properly disposed of at a waste management facility.
- During the site visit, CDFW observed piping used to transport water for domestic and irrigation use from the POD to the water storage tanks located within the channel of a

tributary to Little Larabee Creek. CDFW requests, as a condition of approval, that the pipe is removed from the stream channel.

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