

**From:** [Kamoroff, Corrina@Wildlife](mailto:Kamoroff,Corrina@Wildlife)  
**To:** [Whitney, Andrew](mailto:Whitney,Andrew)  
**Cc:** [Manthorne, David@Wildlife](mailto:Manthorne,David@Wildlife); [Johnson, Cliff](mailto:Johnson,Cliff)  
**Subject:** PLN-12286-CUP, APN: 208-111-029-000  
**Date:** Friday, August 25, 2023 10:38:19 AM  
**Attachments:** [NOV\\_032318\\_HUM\\_208-111-029\\_MJ\\_Morgan\\_Little\\_Larabee\\_Creek.pdf](#)

---

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

Good Afternoon,

Please see the comments below regarding the above referenced project.

**Project Number:** PLN-12286-CUP

**Project Names:** Thomas Morgan - CUP for 12,020 sq ft of outdoor cultivation

**APN(s):** 208-111-029-000

### **Project Description**

A Conditional Use Permit for 12,020 square feet of existing outdoor commercial cannabis cultivation supported by a 768 square foot ancillary nursery. Annual Water Usage is estimated at 120,000 gallons. Total Existing and proposed Storage equals 98,200 gallons. Processing will occur offsite. Electricity is provided by generators and solar is proposed. The project includes a Special Permit for the remediation of a historic cultivation area within a streamside management area.

### **CDFW COMMENTS:**

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

On March 13, 2018, CDFW visited APN 208-111-029-000 and observed activities that are subject to Fish and Game Code (FGC) Section 1602 and 5650 in conjunction with cannabis cultivation operations. On March 23, 2018, CDFW issued an NOV (See attached), to cure all existing FGC violations on the parcel.

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-12286-CUP. CDFW requests that all comments are incorporated in the final Humboldt County Staff Report.

- As of August 24, 2023, no evidence of attempts to address the violations documented in the NOV have been submitted to CDFW. If HCPD elects to approve this project, CDFW requests the applicant resolve all FGC violations as a condition of project approval prior

to cultivating cannabis.

- The estimated annual water usage of 120,000 gallons appears to underestimate the total amount of water needed and does not include domestic use or other uses associated with cannabis cultivation. Additionally, 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 150,000 gallons of water on site in appropriate enclosed water storage facilities.
- CDFW observed obvious signs of instability including slope failure associated with the development of cannabis cultivation due to grading activities on APN: 208-111-029-000. If the Humboldt County Planning Department (HCPD) elects to approve this project, the slopes associated with flats graded for cannabis cultivation should be stabilized to ensure erosion of steep slopes is abated.

Thank you,

**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