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Subject: PLN-2021-16964-CUP, APN: 222-156-013
Date: Thursday, October 30, 2025 9:34:49 AM

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Good morning,

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

Project Number: PDCON Enterprise, LLC

Project Name: PLN-2021-16964

APN(s): 222-156-013

CEQA No: CEQA-2021-0064-0000-R1

Project Description

A Special Permit for 28,500 square feet of new outdoor cannabis cultivation utilizing light deprivation techniques and 1,980 square feet of ancillary nursery space. Cultivation includes two harvests cycles annually. Irrigation water is provided by rainwater catchment from a proposed greenhouse and will be stored in forty 5,000-gallon water tanks or eighty 2500-gallon tanks (200,000 gallons total storage). The applicant estimates an annual water use of approximately 125,000 for cannabis operations, approximately 4.39 gallons per square foot per year. Processing will be completed off site at a licensed third-party processing facility. Power will be provided by a solar array. No employees are proposed for this project.

CDFW COMMENTS:

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

On July 2, 2024, and again on April 10, 2025, CDFW staff conducted a site inspection at the subject property on Assessor' Parcel Number (APN) 222-156-013. During the site visit, staff walked the property to observe current and historic 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-2021-16964-CUP. CDFW requests that all comments are incorporated in the final Humboldt County Staff Report.

1. As of October 15, 2025, the applicant does not have a Lake and Streambed Alteration Agreement (LSAA). CDFW recommends, as a condition of approval, that the applicant receives a final LSAA prior to any ground-breaking activities or the initiation of cannabis cultivation. CDFW further requests, as a condition of approval, that the applicant

maintains compliance with the LSAA once it has been obtained.

2. The project description states that irrigation water is sourced from rainwater catchment with a storage capacity of 200,000 gallons. The applicant estimates an annual water usage of approximately 125,000 gallons for cannabis cultivation. The estimated annual water usage of 125,000 gallons appears to underestimate the total amount of water needed for the proposed project. 200,000 gallons of water storage may not be sufficient to support 28,500 square feet of outdoor cannabis cultivation and 1,980 square feet for ancillary nursery for two harvest cycles annually. CDFW recommends, as a condition of approval, that the applicant store no less than 250,000 gallons of water on site to support the proposed cultivation or provide detailed justification supporting the low water use estimate for the proposed project.
3. The installation of water storage tanks will involve grading and/or ground disturbance and likely require a grading permit. CDFW requests clarification on the extent of grading or ground disturbance that will be required for the proposed cultivation project. CDFW further recommends, as a condition of approval, that the grading permit is referred to CDFW for review and comment. CDFW also recommends, as a condition of approval, that the applicant implement a stormwater plan to direct runoff into settling basins or bioswales, where the runoff can be incorporated into groundwater, and away from streams.
4. While onsite, CDFW observed that the proposed water tank storage, at coordinates 40.0971, -123.8912, is located within the Streamside Management Area (SMA) of a Class III drainage. CDFW recommends, as a condition of approval, that all cultivation related activities, and infrastructure occur outside all SMAs on the parcel.
5. The pond, located at coordinates 40.0977, -123.81129, currently provides habitat for the American bullfrog (*Lithobates catesbeianus*). On July 2, 2024, CDFW observed adult bullfrogs at the pond on site. CDFW recommends, as a condition of project approval, the applicant prepare and submit a Bullfrog Management Plan to CDFW April 15, 2026, and implement the approved plan by August 31, 2026, to address the mitigate the spread of the invasive bullfrog population onsite.
6. While onsite, CDFW observed cement debris, at coordinates 40.0971, -123.8104, placed within the SMA of a Class II tributary to the Eel River. CDFW recommends, as a condition of approval, that all cement and debris be removed from the SMA and that it is fully contained or disposed of at a waste management facility.
7. To minimize the risk of wildlife entrapment, CDFW recommends, as a condition of

approval, either the prohibition of synthetic netting (e.g., plastic or nylon), including photo or biodegradable plastic netting, for use in cultivation operations and/or erosion control, or, if the applicant uses synthetic netting, that the applicant is required to follow Best Management Practices (BMPs) that provides requirements on responsible storage, disposal, and use.

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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