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To: Wiles, Derek
Cc: [Manthorne, David@Wildlife](mailto:Manthorne_David@Wildlife); Johnson, Cliff
Subject: PLN-10841-CUP, APN: 214-234-006
Date: Tuesday, July 2, 2024 3:49:10 PM

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Good Afternoon,

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

Project Number: PLN-10841-CUP

Project Name: Onedrop Agronomics, Inc

APN(s): 214-234-006

CEQA No: CEQA-2017-0463

Project Description

Onedrop Agronomics, Inc - 21,544 sf existing OD

Onedrop Agronomics seeks a Conditional Use Permit (CUP) for an existing 24,000-square-foot (SF) outdoor cultivation and 10% ancillary nursery space. Water for irrigation is sourced from an existing well. Estimated annual water usage is 265,898 gallons (11.08 gallons/SF/year). Total water storage is 37,500 gallons in hard tank storage. Drying and bucking will occur onsite while all other processing will be performed offsite at a licensed third-party processing facility. Power is provided by generators but is conditioned to switch to a renewable source by January 1st, 2026.

CDFW COMMENTS:

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

On October 18, 2023, CDFW staff conducted a site inspection at the subject property on Assessor' Parcel Number (APN) 214-234-006. 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-10841-CUP. CDFW requests that all comments are incorporated in the final Humboldt County Staff Report.

1. On September 13, 2019, CDFW issued a Lake and Streambed Alteration Agreement (LSAA, 1600-2019-0542-0000-R1) to upgrade and maintain three stream crossings. On September 11, 2023, the Permittee received an amendment to the LSAA to extend the work completion date and to modify the treatment at crossing 1. On April 10, 2024, the

Permittee received a Letter of Completed Work for LSAA 1600-2019-0542-0000-R1 confirming that all of the projects have been completed.

2. The Project Description states that the applicant is proposing to use approximately 265,898 gallons of irrigation water annually, sourced from an existing permitted well. Due to the project's high projected water needs, CDFW requests, as a condition of approval, that either a certified hydrologist assess the potential long-term yield of the well with the proposed usage or that the applicant is required to increase water storage to 50,000 gallons.
3. The proposed project states that water will be sourced from an existing groundwater well. CDFW requests, as a condition of project approval, that the 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.
4. While onsite, CDFW observed monofilament netting that was used during cannabis cultivation operations. To minimize the risk of wildlife entrapment, CDFW requests, as a condition of approval, the prohibition of synthetic netting (e.g., plastic or nylon) including photo or biodegradable plastic netting for the purpose of cultivation operations and/or erosion control.
5. While onsite, CDFW observed generators and pumps being used without secondary containment. CDFW requests, as a condition of approval, that the applicant implements secondary containment for any hazardous material storage, generators, and water pumps to prevent any spillage.
6. While onsite, CDFW observed water tanks being used to store water for irrigation without lids. CDFW requests, as a condition of approval, that all water tanks have lids securely fashioned to prevent wildlife entrapment.

Thank you for the opportunity to comment on this project.

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