

From: [Johnson, Cliff](#)
To: [Saucedo, Portia](#)
Subject: FW: PLN-11888-SP, APN: 210-051-070
Date: Friday, February 16, 2024 10:40:45 AM

From: Manthorne, David@Wildlife <David.Manthorne@wildlife.ca.gov>
Sent: Friday, February 16, 2024 10:38 AM
To: Johnson, Cliff <CJohnson@co.humboldt.ca.us>
Cc: Kamoroff, Corrina@Wildlife <Corrina.Kamoroff@Wildlife.ca.gov>
Subject: PLN-11888-SP, APN: 210-051-070

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Hi Cliff,
Please see the attached comments for the project listed above
Thank you

Project Number: PLN-11888-SP
Project Name: Larabee Farm, LLC - Existing 10,000 square foot ML medical cannabis cultivation
APN(s): 210-051-070-000
CEQA: CEQA-2018-0177-0000-R1

Project Description

Larabee Farm, LLC - Existing 10,000 square foot ML medical cannabis cultivation
Applicant is seeking a Special Permit for 9,000 square foot mixed light medical cannabis cultivation. Applicant is proposing a 1,000 SF nursery. Water source is an onsite well. The annual water usage is 78,000 gallons for two cycles of cultivation. Water storage onsite totals 19,750 gallons, store in 9 hard tanks. Processing performed onsite within a 2,304 square foot processing facility. Number of employees expected for operations totals 4. Power source is P.G.

CDFW COMMENTS:

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

On February 15, 2024, CDFW staff conducted a site inspection at the subject property on Assessor Parcel Number (APN) 210-051-070. During the site visit, staff walked the property to observe current, historic, and proposed 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-11888-SP. CDFW requests that all comments are incorporated in the final Humboldt County Staff Report.

- While onsite, CDFW observed that a portion of the cultivation site is located within 30 ft. of a Class III tributary to Butte Creek. CDFW requests, as a condition of approval, that the applicant remove all cannabis cultivation and cultivation related infrastructure that is located within the SMA.
- While onsite, CDFW observed that a subsurface pipe was installed to drain and direct stormwater and surface water from the cultivation flat into a Class III tributary to Butte Creek. CDFW requests, as a condition of approval, that the cultivation area is drained away from any streams and routed into settling basins or bioswales that discourages channelization and promotes dispersal and infiltration of flows.
- The project description states that water storage onsite totals 19,750 gallons stored in 9 hard tanks. While onsite, CDFW only observed two hard tanks totaling 6,000 gallons of water storage for cannabis irrigation. The applicant disclosed to CDFW that they do not plan to add any additional water storage onsite. CDFW requests, as a condition of approval, that the applicant is required to have at least 19,750 gallons of water storage on site.
- While onsite, CDFW observed uncontained trash and debris including discarded plastic tarps. CDFW requests, as a condition of approval, that all uncontained trash is cleaned up and properly disposed of at a waste management facility.
- While onsite, CDFW observed uncontained compost and discarded soil associated with cannabis cultivation. CDFW requests, as a condition of approval, that the applicant fully contains compost piles and all imported soil.
- While onsite, CDFW observed sediment discharge to Waters of the State through erosion of a hydrologically connected road. CDFW requests, as a condition of approval, that the applicant implement an erosion control plan (site management plan) to deconcentrate surface flow off roads and away from streams. This would include maintenance of ditch relief culverts and water bars as necessary to mitigate sediment delivery.
- 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.

Corrina Kamoroff

Environmental Scientist

Habitat Conservation and Planning

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California Department of Fish and Wildlife

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