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**Subject:** PLN-2020-16224, APN: 104-291-005 & 104-321-001  
**Date:** Monday, June 9, 2025 8:28:24 AM

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Good morning,

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

**Project Number:** PLN-2020-16224

**Project Name:** Empress Farms LLC

**APN(s):** 104-291-005 & 104-321-001

**CEQA No:** CEQA-2020-0101-0000-R1

**Project Description:**

Empress Farms LLC - Special Permit

A Special Permit for 33,560 square feet of new outdoor cannabis cultivation and a Special Permit for 43,560 square feet of outdoor cannabis cultivation under the Retirement, Remediation and Relocation (RRR) program with a proposed ancillary nursery area totaling 14,601 square feet, which will provide propagation support for the operations on the subject property as well as for a 35,560 square foot operation on another parcel owned and operated by the applicant (APN 104-311-019). A Conditional Use Permit is also requested for a 9,904 square foot commercial nursery and non-flammable cannabis manufacturing located on a road that is not a paved Road Category 4 standard. The property is already host to an approved 10,000 square foot outdoor cultivation operation (PLN-11418-ZCC). If approved, a total of 87,120 square feet of outdoor cultivation, 14,601 square feet of ancillary propagation, and 9,904 of commercial nursery will be permitted on the property. Water use is projected to be 824,276 gallons per year. The primary irrigation source is an existing 1,097,350-gallon rainwater catchment pond. Electricity is sourced from PG&E.

**CDFW COMMENTS:**

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

On June 6, 2025, CDFW staff conducted a site inspection at the subject property on Assessor' Parcel Number (APN) 104-291-005 & 104-321-001. During the site visits, 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-2020-16224. CDFW requests that all comments are incorporated in the final Humboldt County Staff Report.

1. On June 21, 2019, a Lake and Streambed Alteration Agreement (LSAA, EPIMS-06638-HUM-R1) was issued to Joshua Free. The applicant did not install a water meter or submit the required water monitoring reports for a project that includes water diversion. The LSAA expired on June 21, 2024. As a result, the applicant has not demonstrated compliance with the conditions in the expired LSAA and does not have a valid LSAA. The applicant maintains a single encroachment for water diversion that is used by onsite workers. CDFW requests, as a condition of approval, the applicant either:
  - a. Obtain a final LSAA that includes the water diversion, or
  - b. Remove the Point of Diversion (POD) and receive a No Agreement Needed letter from CDFW
1. To minimize the risk of wildlife entrapment, CDFW requests, 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**

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