

Saucedo, Portia

From: Manthorne, David@Wildlife <David.Manthorne@wildlife.ca.gov>
Sent: Thursday, June 22, 2023 4:31 PM
To: Saucedo, Portia
Cc: Johnson, Cliff
Subject: PLN-12987-CUP

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

Hi Portia,

Please see the comments for this project below. Note that the applicants were not aware that this project could come to decision on July 6, 2023.

Project Number: PLN-12987-CUP

Project Name: Ram Ram Bliss 2, LLC - CUP

APN(s): 216-094-009-000

Project Description: A Conditional Use Permit for 11,762 square feet of existing mixed light cannabis cultivation. Water is sourced from three onsite rainwater catchment ponds. Water storage for irrigation consists of one 162,000 gallon pond, one 140,000 gallon pond, 90,000 gallon pond, two 20,000 gallon bladders, one 15,000 gallon bladder, one 24,000 gallon metal tank, seven 3,000 gallon poly tanks, two 5,000 gallon poly tanks, two 1,000 gallon tanks, one 500 gallon tank, and one 300 gallon tank for a total of 505,400 gallons of water storage. Processing activities including drying, curing, and trimming occur onsite within a 968 square foot building. Power is provided through a mix of solar and generator use.

CDFW COMMENTS:

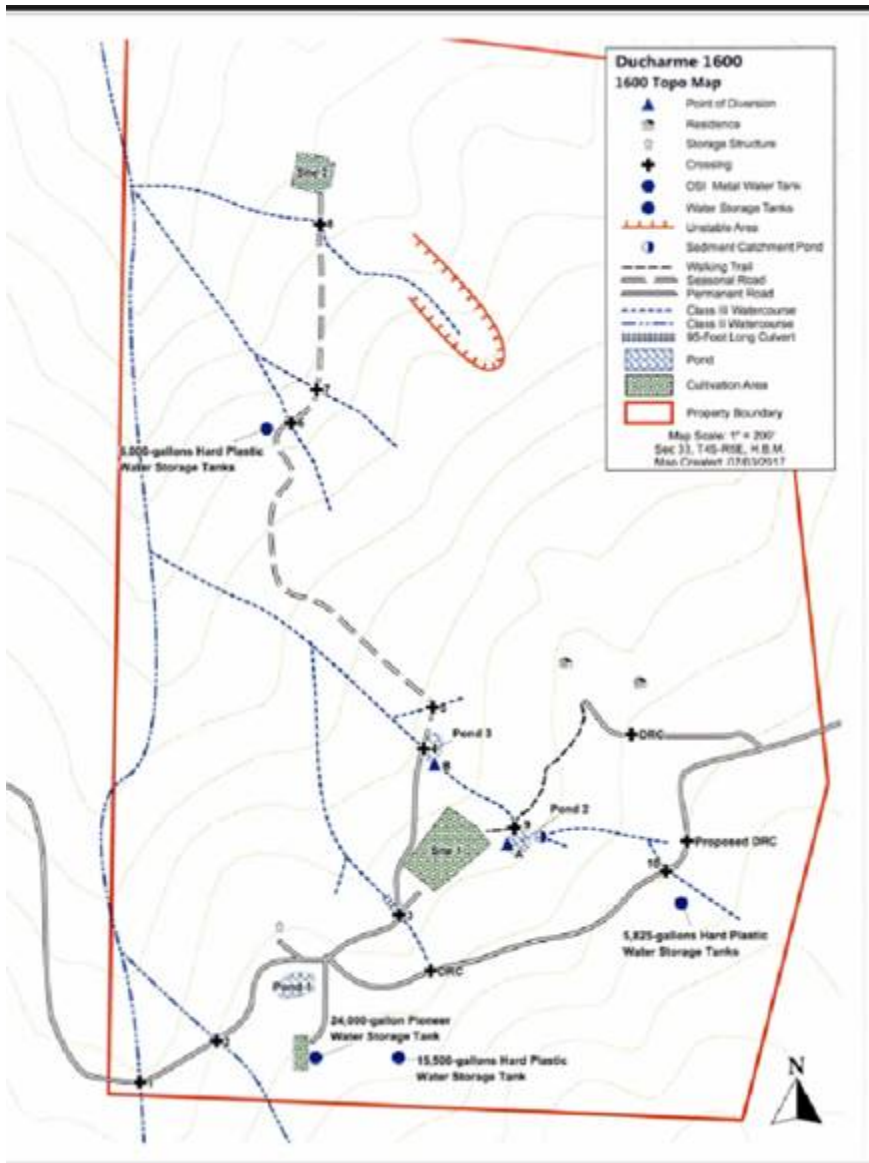
Thank you for referring this application to the California Department of Fish and Wildlife (CDFW) for review and comment.

On June 20, 2023, CDFW staff conducted a site inspection at the subject property on Assessor' Parcel Numbers (APNs) 216-094-009-000. 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 proposed project is located ~ 0.7 miles away from a documented Northern Spotted Activity Center (CDFW 2023). The referral material show that the applicant will be using generators for 11,762 square feet of mixed-light cultivation. Noise and light pollution associated with mixed-light cultivation have the potential to impact sensitive species such as the Northern Spotted Owl. During the site visit, generators were observed at two separate locations on the parcel with no containment or sound barriers in use. CDFW recommends, as a condition of project approval, consolidating all generators to one centralized area on the property. Additionally, the permittee should implement appropriate noise and fuel containment to minimize disturbance to sensitive wildlife species. CDFW further recommends, to transition from generator use to either PG&E power or renewable energy for the proposed project.

- An unpermitted on-stream lined pond (Pond 2, see attached map) was constructed and used for irrigation on site that is in violation with Fish and Game Code 1602. The on-stream pond is currently proposed as a water source for irrigation. The on-stream pond has significantly altered the natural flow of an unnamed Class III tributary to Jewett Creek and has caused erosion and sediment to be discharged into the Class III drainage. CDFW recommends, as a condition of approval, to require the applicant to submit a Stream Restoration Plan that is approved by CDFW to restore the impacted drainage and minimize discharge and restore the natural hydrology.
- A dirt road that provided access to a decommissioned cannabis cultivation site located on the northern portion of the parcel is currently hydrologically connected to surface waters (crossings 6, 7, and 8). CDFW recommends, as a condition of project approval, that the dirt road is decommissioned, and that water bars are appropriately constructed on the road to mitigate discharge to streams.
- The Lake and Streambed Alteration Agreement (LSA) for this project (1600-2017-0559-R1) is expired and had a required work completion date no later than July 15, 2019. Work for Crossing 3 (see attached map) has not been completed, nor has the applicant submitted a work completion report. CDFW requests, as a condition of project approval, that the applicant notifies for the required projects and submit all required reporting to CDFW.
- Trash and debris were observed in the stream channel on the project parcel. Additionally, water tanks and infrastructure associated with cannabis cultivation is located within the SMA of the Class III drainage. CDFW requests that a condition of approval includes a requirement to remove all infrastructure and debris from the stream channel and the SMA as soon as possible.

Thank you for the opportunity to comment on this project.



David Manthorne
 Senior Environmental Scientist Supervisor
 Habitat Conservation and Planning
 Humboldt/Del Norte LSA Program
 California Department of Fish and Wildlife
 619 Second Street
 Eureka, CA 95501
 (707) 441-5900