



DEPARTMENT OF FISH AND WILDLIFE

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Governor's Office of Planning & Research

May 04 2021

May 3, 2021

STATE CLEARINGHOUSE

Eric Hughes
Senior Planner
County of San Luis Obispo
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**Subject: Engrained LLC Minor Use Permit; DRC2020-00115 (Project)
Mitigated Negative Declaration (MND)
SCH Number: 2020030752**

Dear Mr. Hughes:

The California Department of Fish and Wildlife (CDFW) received an MND from San Luis Obispo County for the above-referenced Project pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

Thank you for the opportunity to provide recommendations regarding the activities proposed at the Project site that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects on the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under Fish and Game Code. While the comment period may have passed, CDFW would appreciate if the County of San Luis Obispo will still consider our comments.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (*Id.*, § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in take as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), related authorized as provided by the Fish and Game Code will be required.

In this role, CDFW is responsible for providing, as available, biological expertise during public agency environmental review efforts (e.g., CEQA), focusing specifically on project activities that have the potential to adversely affect fish and wildlife resources. CDFW provides recommendations to identify potential impacts and possible measures to avoid or reduce those impacts.

Bird Protection: CDFW has jurisdiction over actions with potential to result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections that protect birds, their eggs, and nests include sections 3503 (regarding unlawful take, possession or needless destruction of the nest or eggs of any bird), 3503.5 (regarding the take, possession, or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird).

Fully Protected Species: CDFW has jurisdiction over fully protected species of birds, mammals, amphibians, reptiles, and fish pursuant to Fish and Game Code sections 3511, 4700, 5050, and 5515. Take of any fully protected species is prohibited and CDFW cannot authorize their incidental take.

Unlisted Species: Species of plants and animals need not be officially listed as Endangered, Rare, or Threatened (E, R, or T) on any State or Federal list to be considered E, R, or T under CEQA. If a species can be shown to meet the criteria for E, R, or T as specified in the CEQA Guidelines (Cal. Code Regs., tit. 14, § 15380), CDFW recommends it be fully considered in the environmental analysis for this Project.

PROJECT DESCRIPTION SUMMARY

Proponent: Engrained LLC

Objective: The Project proponent is seeking a Minor Use Permit, for cannabis cultivation, resulting in approximately 10.2 acres of site disturbance on a 77-acre parcel. Construction will consist of cannabis cultivation within eighty-eight hoop houses, outdoor cultivation, construction of three greenhouses, one ancillary nursery, twelve 5,000-gallon water storage tanks, one 20,000-gallon water tank, ancillary buildings,

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6-foot-tall secure chain-link fence, four 320-square-foot cargo containers, aggregate base roads. The project also includes planting of eleven blue oak trees around the perimeter of the property, 10,610 cubic yards of cut, and 8,778 cubic yards of fill to be balanced onsite. The Project will be implemented into two phases.

Location: 4150 North Ryan Road, approximately 2.25 miles northeast of the community of Creston in the El Pomar-Estrella sub-area of the North County Planning Area, County of San Luis Obispo, Assessor's Parcel Number (APN) 042-211-014.

Timeframe: Unspecified.

RECOMMENDATIONS

CDFW offers the following recommendations to assist the county of San Luis Obispo in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the document.

Environmental Setting and Related Impact

Review of the California Natural Diversity Database (CNDDDB) data reveals records for wildlife species within the vicinity of the Project site including, but not limited to species of special concern, California Rare Plant Ranked (CRPR) 1B.1 La Panza Mariposa lily (*Calochortus simulans*), pale yellow layia (*Layia heterotrichia*), and the CRPR 1B.2 Lemmon's jewelflower (*Caulanthus lemmonii*).

COMMENT 1: Special status plants

Issue: Several special-status plants have been documented to occur near the vicinity of the Project site, including La Panza Mariposa lily, Lemmon's jewelflower, and pale yellow layia (CDFW 2021). Review of aerial imagery indicates that of the Project site supports grassland, chaparral, and oak woodland, which may support these special-status plants.

Specific impact: Without appropriate avoidance and minimization measures for special status plants, potential significant impacts associated with the future development of the Project site could include inability to reproduce, direct mortality, and habitat modification.

Evidence impact is potentially significant: The Project site and surrounding areas contain suitable soils, elevations, and other habitat features, which may provide suitable habitat for special status plant species, La Panza Mariposa lily, Lemmon's jewelflower, and pale yellow layia. As a result, habitat loss and degradation resulting from ground-disturbing activities have the potential to significantly impact special status plant species.

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Recommended Potentially Feasible Mitigation Measure(s)

To evaluate potential impacts to special status plant species, CDFW recommends conducting the following evaluation of the subject parcel and surrounding areas adjacent to the Project site and implementing the following mitigation measures.

Recommended Mitigation Measure 1: Special Status Plant Habitat Assessment

CDFW recommends that a qualified biologist conduct a habitat assessment in advance of the Project implementation to determine if special status plant species or their habitats are present on or in the vicinity of the Project and propose appropriate mitigation measures to avoid impacts to those resources.

Recommended Mitigation Measure 2: Special Status Plant Surveys

If suitable habitat is present, CDFW recommends the Project site and surrounding areas be surveyed for special status plants by a qualified botanist following the "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities" (CDFW, 2018). This protocol, which is intended to maximize detectability, includes identification of reference populations to facilitate the likelihood of field investigations occurring during the appropriate floristic period.

Recommended Mitigation Measure 3: Special Status Plant Avoidance

CDFW recommends special status plant species be avoided whenever possible by delineation and observing a no-disturbance buffer of at least 50-feet from the outer edge of the plant population(s) or specific habitat type(s) required by special status plant species. If buffers cannot be maintained, then consultation with CDFW is warranted to determine appropriate minimization and mitigation measures for impacts to special status plant species.

Recommended Mitigation Measure 4: Special Status Plant Take Authorization

If a plant species listed pursuant to CESA or the Native Plant Protection Act is identified during botanical surveys, consultation with CDFW is warranted to determine if the Project can avoid take. If take cannot be avoided, take authorization prior to any ground disturbing activities may be warranted. Take authorization would occur through issuance of an Incidental Take Permit (ITP) by CDFW, pursuant to Fish and Game Code section 2081(b).

COMMENT 2: Lake and Streambed Alteration

Issue: Project site is located within a property containing ephemeral stream(s) within and adjacent to the Project site. The Project has the potential to temporarily and/or permanently impact these ephemeral streams. Activities within or adjacent to

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streams may be subject to CDFW's lake and streambed alteration regulatory authority, pursuant Fish and Game Code section 1600 et seq.

Specific impact: Work within or adjacent to stream channels have the potential to result in deposition of debris, waste, sediment, toxic runoff, or other deleterious materials into water causing water pollution and degradation of water quality.

Evidence impact is potentially significant: Review of aerial imagery indicates that there may be at least one ephemeral stream located on the property approximately 100-feet North of the proposed location of eighty-eight hoop houses. Additionally, the Project site includes activities adjacent to three unnamed ephemeral tributaries of Huer Huero Creek, located approximately 0.21 miles to 0.27 miles from the Project site, these activities may be subject to CDFW's lake and streambed alteration regulatory authority.

Project activities within and or near streams, may have the potential to impact the streams on or near the Project site and downstream waters. Although ephemeral streams, such as the streams adjacent to the Project site, are mostly dry, recent studies have shown that biodiversity and habitat values of dryland streams are considerably higher than in the adjacent uplands, transporting and delivering water, and providing linear habitat connectivity and refuge, and concentrating seeds, organic matter, and sediment. Moreover, the ecological viability of the dryland environment depends on the sustainability of the physical/hydrological processes that form and maintain episodic streams and the habitat they support (Brady and Vyverberg, 2013).

Ephemeral streams function in the collection of water from rainfall, storage of various amounts of water and sediment, discharge of water as runoff and the transport of sediment. Ephemeral streams also support diverse sites and pathways in which chemical reactions take place and provide habitat for fish and wildlife species. Disruption of stream systems such as these can have significant physical, biological, and chemical impacts that can extend into the adjacent uplands adversely effecting not only the fish and wildlife species dependent on the stream itself, but also the flora and fauna dependent on the adjacent upland habitat for feeding, reproduction, and shelter.

Recommended Potentially Feasible Mitigation Measure(s)

Notification of Lake and Streambed Alteration

Review of aerial imagery indicates that there may be at least one ephemeral stream located on the property approximately 100-feet North of the proposed location of eighty-eight hoop houses. Additionally, the Project site is also adjacent to three unnamed ephemeral tributaries of Huer Huero Creek, located approximately 0.21 miles to 0.27 miles from the Project site. CDFW has regulatory authority with regard

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to activities occurring in streams and/or lakes that could adversely affect any fish or wildlife resource, pursuant to Fish and Game Code section 1600 et seq. Section 1602 subsection (a) of the Fish and Game Code requires an entity to notify CDFW before engaging in activities that would substantially change or use any material from the bed, channel, or bank of any stream or substantially divert or obstruct the natural flow of a stream. It is unclear if proposed Project activities may involve activities that are jurisdictional under Fish and Game Code section 1602. CDFW recommends coordination with CDFW staff prior to ground-breaking activities on-site or submit a Lake or Streambed Alteration Notification to determine if the activities proposed are subject to CDFW's jurisdiction. Please note that CDFW is required to comply with CEQA in the issuance of a Lake or Streambed Alteration Agreement.

Additionally, Business and Professions Code 26060.1 subsection (b)(3) includes a requirement that California Department of Food and Agriculture cannabis cultivation licensees demonstrate compliance with Fish and Game Code section 1602 through written verification from CDFW. CDFW recommends submission of a Lake and Streambed Alteration Notification to CDFW for the proposed Project prior to initiation of any cultivation activities.

II. Editorial Comments and/or Suggestions

Mitigation Measure **BIO-3** Silvery Legless Lizard and California Glossy Snake Surveys and Avoidance. Page 36 and 37

As currently drafted, **BIO-3** states "The surveyor shall capture and relocate any legless lizards, California glossy snakes, or other reptiles observed during the survey effort. The captured individuals shall be relocated from the construction area and placed in suitable habitat on the site but outside of the work area." CDFW recommends avoidance whenever possible is encouraged via delineation and observing a 50-foot no-disturbance buffer from individuals and/or active burrows. Additionally, CDFW recommends that if any silvery legless lizards (*Anniella pulchra*) and California glossy snake (*Arizona elegans occidentalis*) are discovered at the site immediately prior to or during the Project activities, that they first be allowed to move out of the area on their own volition, if relocation is necessary, individuals shall be captured by a qualified biologist with the appropriate handling permits and relocated to suitable habitat outside of the construction/work area.

Mitigation Measure **BIO-4** San Joaquin Pocket Mouse Surveys and Avoidance Page 37

As currently drafted, **BIO-4** states "Any San Joaquin pocket mice observed during the pre-disturbance surveys or grading activities shall be captured and relocated from the construction area and placed in suitable habitat on the site but outside of the work area. Following the survey and monitoring efforts, the County approved biologist shall submit to the County a project completion report that documents the number of San Joaquin pocket mice captured and relocated." CDFW recommends avoidance whenever possible, and encourages, via delineation and observation of a 50-foot no-disturbance

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buffer from individuals and/or active burrows of San Joaquin pocket mouse (*Perognathus inornatus*) (SJPM). Additionally, CDFW recommends that if any SJPM are discovered at the site immediately prior to or during Project activities, they be allowed to move out of the area on their own volition.

If avoidance is not feasible, CDFW recommends that focused protocol-level trapping surveys be conducted by a qualified wildlife biologist that is permitted to do so by both CDFW and USFWS well in advance of ground-disturbing activities to determine if SJPM occurs in the Project site.

Mitigation Measure **BIO-5** California Red-Legged Frog and Foothill Yellow-Legged Frog Surveys and Avoidance. Page 37 and 38.

As currently drafted, **BIO-5** states “A United States Fish and Wildlife Service-approved and CDFW-approved biologist shall survey the project area no more than 48 hours before the onset of project site disturbance activities of all project phases.” CDFW recommends that a qualified wildlife biologist conduct focus level surveys for California Red-legged Frog (*Rana draytonii*) (CRLF) in accordance with the USFWS “Revised Guidance on Site Assessment and Field Surveys for the California Red-legged Frog” (USFWS 2005) and for foothill yellow-legged frog (*Rana boylei*) (FYLF) in accordance with the CDFW “Consideration for Conserving the Foothill Yellow-Legged Frog” (CDFW 2018) to determine if CRLF and FYLF are present within or adjacent to the Project site.

As currently drafted, **BIO-5** states “If any life stage of the California red-legged frog or foothill yellow-legged frog is found and these individuals are likely to be killed or injured by work activities, the approved biologist will be allowed sufficient time to move them from the site before work activities begin.” CDFW recommends that initial ground-disturbing activities be timed to avoid the period when CRLF and FYLF are most likely to be moving through upland areas (November 1 and March 31). If ground-disturbing activities must take place between November 1 and March 31, CDFW recommends that a qualified biologist monitor construction activity to avoid impacts to CRLF and FYLF.

If any CRLF and/or FYLF are found during preconstruction surveys or at any time during construction, CDFW recommends that construction cease and that CDFW be contacted to discuss a relocation plan for CRLF and FYLF. Additionally, if through surveys, it is determined that FYLF occupy or have the potential to occupy the Project site and take cannot be avoided, acquisition of an ITP pursuant to Fish and Game Code section 2081(b) would be required to comply with CESA.

Mitigation Measure **BIO-9** Western Spadefoot and Western Pond Turtle Surveys and Avoidance. Page 38 and 39.

As currently drafted, **BIO-9** states “a qualified biologist shall survey the project site and, if present, capture and relocate any western spadefoot or western pond turtles to suitable habitat outside of proposed disturbance areas.” CDFW recommends avoidance

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whenever possible and encourages via delineation and observation of a 50-foot no-disturbance buffer from any western spadefoot and/or western pond turtle. Additionally, CDFW recommends that if any western spadefoot and/or western pond turtle are discovered at the site immediately prior to or during Project activities, they be allowed to move out of the area on their own volition. If relocation is necessary, individuals shall be captured by a qualified biologist with the appropriate handling permits and relocated to suitable habitat outside of the construction/work area.

Mitigation measure **BIO-12** Kit Fox Speed Limit Signage, Page 41

As currently drafted, **BIO-12** states “the applicant shall clearly delineate the following as a note on the project plans: Speed signs of 25 mph (or lower) shall be posted for all construction traffic to minimize the probability of road mortality of the San Joaquin kit fox.” CDFW recommends speed limits be 15 mph (or lower) to avoid potential impacts to wildlife.

Mitigation measure **BIO-13** Kit Fox Night Construction Limitations. Page 41

As currently drafted, **BIO-13** states, “During the site disturbance and/or construction of each project phase, grading and construction activities after dusk shall be prohibited unless coordinated through the County, during which additional kit fox mitigation measures may be required.” San Joaquin kit foxes (*Vulpes macrotis mutica*) (SJKF) are nocturnal and are particularly active just after dusk when they emerge from their dens and begin foraging and hunting (Morrell, 1972; Zoellick, 1990). CDFW recommends that the Project related activities occur during daylight hours to avoid impacts to SJKF and other nocturnal wildlife.

Mitigation measure **BIO-18** Kit Fox Mortality Procedures. Page 42

As currently drafted, **BIO-18** states “During the site-disturbance and/or construction phase, any contractor or employee that inadvertently kills or injures an SJKF or who finds any such animal either dead, injured, or entrapped shall be required to report the incident immediately to the County.” This statement indicates that take of SJKF may occur. CDFW recommends consultation with CDFW to discuss how to avoid take. If avoidance is not feasible, acquisition of an ITP pursuant to Fish and Game Code section 2081(b) prior to ground disturbing activities would be required to comply with CESA.

Mitigation measure **BIO-21** Nesting Bird Avoidance, page 42 and 43

As currently drafted, **BIO-21** states “A 50-foot exclusion zone shall be placed around non-listed, passerine species, and a 250-foot exclusion zone will be implemented for raptor species. Each exclusion zone shall encircle the nest and have a radius of 50 feet (non-listed passerine species) or 250 feet (raptor species)” CDFW Recommends that if a fully protected raptor species nest, such as white-tailed kite (*Elanus leucurus*), bald

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eagle (*Haliaeetus leucocephalus*), or golden eagle (*Aquila chrysaetos*) is found within ½ mile of the Project site, implementation of avoidance measures is warranted. CDFW recommends that a qualified wildlife biologist be on-site during all Project-related activities and that a ½-mile no-disturbance buffer be implemented from any nest site. If the ½-mile no-disturbance buffer cannot feasibly be implemented, contacting CDFW for assistance with additional avoidance measures is recommended. Fully addressing potential impacts to fully protected raptor species and requiring measurable and enforceable mitigation in the MND is recommended.

Mitigation measure **BIO-22** Roosting Bat Avoidance. Page 43

As currently drafted, **BIO-22** states, “If site disturbance activities of any project phase are to occur within this season, the applicant shall retain a County-qualified biologist to conduct a preconstruction survey within 14 days prior to commencement of proposed site disturbance activities.” CDFW recommends focused survey methodology, including visual surveys of bats (observation of presence of bats during foraging period), inspection for suitable habitat or bat sign (guano), and use of ultrasonic detectors during all dusk emergence and pre-dawn re-entry. To maximize detectability, surveys should be conducted within one 24-hour period. In addition, CDFW recommends that if bats are found to occupy the Project site, establishing a 100-foot no-disturbance buffer around roost sites, installing temporary exclusionary devices at the appropriate time of year to avoid take, and installing new roost sites prior to initiation of Project-related activities to allow enough time for bats to relocate. CDFW recommends consultation and specific notice if bats may be disturbed by Project-related activities.

Land Conversion: Project activities that result in land conversion may also result in habitat loss for special status species, migration/movement corridor limitations, or fragmentation of sensitive habitat. Loss of habitat to development and agriculture are contributing factors to the decline of many special status species and game species. CDFW recommends CEQA documents generated for cannabis activities address cumulative impacts of land conversion.

Cumulative Impacts: General impacts from Projects include habitat fragmentation, degradation, habitat loss, migration/movement corridor limitations, and potential loss of individuals to the population. Multiple cannabis-related Projects have been implemented and proposed throughout San Luis Obispo County with similar impacts to biological resources. CDFW recommends the lead agency consider all approved and future projects when determining impact significance to biological resources.

Cannabis Water Use: Water use estimates for cannabis plants are not well established in literature and estimates from published and unpublished sources range between 3.8-liters and 56.8-liters per plant per day. Based on research and observations made by CDFW in northern California, cannabis grow sites have significantly impacted streams through water diversions resulting in reduced flows and dewatered streams (Bauer, S. *et al.* 2015). Groundwater use for clandestine cannabis cultivation activities

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have resulted in lowering the groundwater water table and have impacted water supplies to streams in northern California. CDFW recommends that CEQA document address the impacts to groundwater and surface water that may occur from Project activities.

ENVIRONMENTAL DATA

CEQA requires that information developed in Environmental Impact Reports and Negative Declarations be incorporated into a database, which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special status species and natural communities detected during Project surveys to CNDDDB. The CNDDDB field survey form can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The completed form can be mailed electronically to CNDDDB at the following email address: CNDDDB@wildlife.ca.gov. The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

FILING FEES

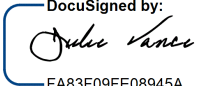
If it is determined that the Project has the potential to impact biological resources, an assessment of filing fees will be necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final (Cal. Code Regs., tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

CONCLUSION

CDFW appreciates the opportunity to comment on the Project to assist the county of San Luis Obispo in identifying and mitigating Project impacts on biological resources.

Should you have questions regarding this letter or for further coordination, please contact Shannon Dellaquila, Senior Environmental Scientist (Specialist), by phone at 559-899-9758 or electronic mail at Shannon.Dellaquila@wildlife.ca.gov.

Sincerely,

DocuSigned by:

FA83F09FE08945A...
Julie A. Vance
Regional Manager

Attachment

ec: Shannon Dellaquila
California Department of Fish and Wildlife

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REFERENCES

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