

ATTACHMENT 2

**CEQA ADDENDUM TO THE
FINAL ENVIRONMENTAL IMPACT REPORT FOR THE COMMERCIAL CANNABIS LAND USE ORDINANCE**

**Commercial Cannabis Land Use Ordinance Final Environmental Impact Report (EIR)
(State Clearinghouse # 20171042022), January 2018**

**APN 211-372-006; 13360 Dyerville Loop Road, Myers Flat
County of Humboldt**

**Prepared By
Humboldt County Planning and Building Department
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Background

Modified Project Description and Project History –

The Commercial Cannabis Land Use Ordinance (CCLUO) established specific regulations for commercial cannabis operations in Humboldt County. These regulations were developed in concert with the Environmental Impact Report (EIR) that was adopted for the ordinance to implement the mitigation measures of the EIR. The EIR addressed the broad environmental impacts that could be expected to occur from the adoption and implementation of the ordinance. The EIR specified that the regulations established in the CCLUO would mitigate the impacts of existing and proposed cannabis operations by establishing regulations for an existing or planned unregulated land use to help prevent and reduce environmental impacts that are known to result from unpermitted baseline cultivation operations. Commercial cannabis cultivation in existence as of December 31, 2015, was included in the environmental baseline for the EIR, and the EIR states that “Bringing existing operations into compliance will help to attenuate potential environmental effects from existing cultivation activities, including aesthetic impacts resulting from improper operation or poor siting.” The current project was contemplated by the EIR, and compliance with the provisions of the CCLUO will fully mitigate all environmental impacts of the project to a less-than-significant level.

The modified project involves a Special Permit to expand an existing 8,750-square-foot (SF) cannabis cultivation operation consisting of two light-deprivation greenhouses to 41,300 SF of outdoor cultivation in 11 light-deprivation greenhouses situated on less than 20 percent of the prime agricultural soils on the 80-acre parcel. Ancillary propagation would occur in a proposed 3,900-SF greenhouse. Water is sourced from a 350,000-gallon onsite rainwater catchment pond and a 220-foot-deep well. A point of diversion is used for domestic water. Water usage is estimated to be approximately 379,444 gallons per growing season at full buildout (9.2 gallons/SF/year). Existing water storage of 353,300 gallons would be expanded to 421,300 gallons at full project buildout. Drying of cannabis would continue onsite in an existing outbuilding using dehumidifiers and fans. Offsite processing in a licensed facility is proposed. An existing residence unrelated to the cannabis operation is onsite. Up to three independent contract employees are anticipated during peak operations. Power is currently provided by a 25-kilowatt (kW) (and backup 45-kW) diesel generator as the applicant finalizes plans to install a solar array. Expansion is only allowed once the applicant demonstrates conversion to alternative energy to meet total power needs within 3 years of the permit as a condition of approval. Two additional Special Permits are required for the buffer reduction of the storage pond located within delineated wetland buffers and for the ongoing maintenance of a registered point of diversion.

A Biological Assessment was prepared for the project following a single January 2020 field visit by a wildlife biologist with O’Brien Biological Consultants in accordance with CCLUO Mitigation Measure 3.4-1a. A protocol-level botanical survey report was prepared in October 2021 in accordance with CCLUO Mitigation Measure 3.4-3a, -3b, and -4. In addition, owing to presence of potential wetlands, a wetland delineation was prepared by the same botanical consultant in January 2019 in accordance with CCLUO Mitigation Measure 3.4-5. Although member species of documented Sensitive Natural Communities were identified (e.g., California oatgrass [*Danthonia*

californica] and blue wildrye [*Elymus glaucus*]), their abundance was below membership rules for the community. These studies concluded the parcel contains coniferous forest, grasslands, and seasonal wetlands and that most of the proposed cultivation is on existing cultivation footprints or in previously graded areas. The additional grading necessary for the cultivation expansion was estimated to impact approximately 17,630 SF (0.40 acre) of grassland not considered a Sensitive Natural Community by the experienced botanical consultant. Delineated wetlands and associated wetland setbacks are shown on the revised 2021 Site Plan. The nearest northern spotted owl (NSO) activity center is located approximately 0.48 mile east of the nearest cultivation area, with critical habitat located approximately 4.1 miles from the site. Lands south of the cultivation site and surrounding the parcel are heavily forested with appropriately aged coniferous forest; thus, there is high potential for NSOs to occur on or near the property. The Biological Assessment concluded that there is a potential noise or light impact on NSO nesting habitat from the cannabis cultivation operations and recommended surveys be conducted to determine potential presence on the property beginning in 2020. Thus, the project is conditioned to engage a qualified biologist to plan and conduct NSO surveys consistent with *Section 9: Surveys for Disturbance Only Projects* of the *Protocol for Surveying Proposed Management Activities That May Impact Northern Spotted Owls* (U.S. Fish and Wildlife Service 2012) and in accordance with CCLUO Mitigation Measure 3.4-1e requiring surveys wherever ground-disturbing activities are adjacent or within suitable nesting, roosting, or foraging habitat.

A Cultural Resources Investigation Report was prepared in May 2018, and an Addendum Report prepared in December 2020, by Mark Arsenault, MA, RPA, principal investigator with Arsenault & Associates in Sacramento. Per the report, an outreach email was sent to the Bear River Band of the Rohnerville Rancheria and “no relevant or important response to the outreach was received.” The report concluded that the proposed project will not result in any adverse changes to historical or archaeological resources, recommended Inadvertent Discoveries Protocol, and noted that if engineering plans change or additional ground disturbing activities were necessary, to contact Mark Arsenault for further information.

Purpose - Section 15164 of the California Environmental Quality Act (CEQA) provides that the lead agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary, but none of the conditions described in Section 15162 calling for a subsequent EIR or Negative Declaration have occurred. Section 15162 states that when an EIR has been certified for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

1. Substantial changes are proposed in the project that require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following: A) the project will have one or more significant effects not discussed in the previous EIR; B) significant effect previously examined will be substantially more severe than shown in the previous EIR; C) mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or D) mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Summary of Significant Project Effects and Mitigation Recommended

No changes are proposed for the original EIR recommended mitigations. The proposal to authorize the expansion of an existing 8,750-SF cannabis cultivation site to 41,300 SF of outdoor cannabis cultivation in 11 light-deprivation greenhouses is fully consistent with the impacts identified and adequately mitigated in the original EIR. The project as conditioned to implement responsible agency recommendations results in no significantly adverse environmental effects beyond those identified in the EIR. Compliance with the CCLUO ensures consistency with the adopted EIR and provides for mitigation of all project-related impacts to a less than significant level.

EXPLANATION OF DECISION NOT TO PREPARE A SUPPLEMENTAL MITIGATED NEGATIVE DECLARATION OR ENVIRONMENTAL IMPACT REPORT

Summary of Significant Project Effects and Mitigation Recommended

A review of Appendix G impacts:

Aesthetics: The project is for outdoor cannabis cultivation in an existing open meadow surrounded by forestland. There are no public views to or from the project site and there are no scenic vistas or scenic resources on the property. The project will not create a source of light or glare. No impact.

Agriculture and Forestry Resources: The project will utilize agricultural land for agricultural purposes as contemplated in the EIR. The project will not convert prime farmland or conflict with existing zoning for agricultural use or Williamson Act contract. Cannabis cultivation is proposed within prime agricultural soils as contemplated by the EIR, and will utilize the existing prime soils for cultivation purposes. Cannabis is an agricultural product. The project will not result in the loss of forest land or conversion of forest land to non-forest use. No impact.

Air Quality: Minimal construction activities are associated with the project. All construction activities are associated with the development of the small 800 square foot processing building, new water storage tanks and the light deprivation greenhouses. The project will not expose sensitive receptors to pollutants or create objectionable odors affecting a substantial number of people. The project would not result in significant sources of greenhouse gas emissions. The project does utilize a gravel road, and traffic on gravel roads contribute to PM-10, for which the North Coast Air Basin is already in non-attainment, however the EIR for the CCLUO identified

this as a significant and unavoidable impact and a Statement of overriding considerations was made by the Board of Supervisors. The use of this gravel road for this cannabis project is therefore not a substantial change or additional significant impact not considered under the EIR.

Biological Resources: A Biological Assessment was prepared for the project following a single January 2020 field visit by a wildlife biologist with O'Brien Biological Consultants in accordance with CCLUO Mitigation Measure 3.4-1a (**Attachment 3N**). The wildlife biologist described the dominant forested vegetation as montane hardwood conifer and early- to mid-successional Douglas fir forest, which is a Sensitive Natural Community with a California Rare Plant Rank of S3. No trees are proposed to be removed by the project. There are mapped special-status plant species within 0.6 mile of the site (coast fawn lily; CRPR 2B.2), and sensitive natural communities could occur on site in areas where operations may occur. As a result, a botanical consultant prepared a protocol-level botanical survey report in October 2021. The project area was floristically surveyed on April 15, May 28, and July 29, 2021, and all plants were identified to the taxonomic level necessary to determine whether they are special status. Although member species of documented Sensitive Natural Communities were identified (e.g., California oatgrass [*Danthonia californica*] and blue wildrye [*Elymus glaucus*]), their abundance was below membership rules for the community. These studies concluded the parcel contains coniferous forest, grasslands, and seasonal wetlands and that most of the proposed cultivation is on existing cultivation footprints or in previously graded areas. The additional grading necessary for the cultivation expansion was estimated by the experienced botanical consultant to impact approximately 17,630 SF (0.40 acre) of grassland not considered a Sensitive Natural Community. Delineated wetlands and associated wetland setbacks are shown on the Site Plan.

The nearest northern spotted owl (NSO) activity center is located approximately 0.48 mile east of the nearest cultivation area, with critical habitat located approximately 4.1 miles from the site. Lands south of the cultivation site and surrounding the parcel are heavily forested with appropriately aged coniferous forest; thus, there is high potential for NSO to occur on or near the property. The nearest mapped critical habitat for marbled murrelets is approximately 1.7 miles to the west, and there is likely no potential nesting habitat located on the parcel's assessment area. The Biological Assessment concluded that there is a potential noise or light impact on NSO nesting habitat from the cannabis cultivation operations and recommended surveys be conducted to determine potential presence on the property prior to development. A qualified biologist familiar with the life history of the NSO conducted a Disturbance and Habitat Modification Assessment to determine the presence of the species and whether the cultivation site can operate or have its operation modified to avoid take of the species. It was determined that the project would not impact any NSO habitat and would not have adverse impacts to NSO provided that standard noise and light attenuation measures were adhered to.

The findings and conclusions of the Biological Report are consistent with the findings and conclusions of the EIR for the CCLUO. Less than significant impact.

Cultural Resources: The project was referred to the Northwest Information Center, and the Bear River Band in April 2018. A Cultural Resources Investigation was prepared in May 2018, and an Addendum Report prepared in December 2020, by Mark Arsenault, MA, RPA, principal investigator of Arsenault & Associates in Sacramento. Per the report, an outreach email was sent

to the Bear River Band of the Rohnerville Rancheria and “no relevant or important response to the outreach was received.” The report concluded that the proposed project will not result in any adverse changes to historical or archaeological resources, recommended Inadvertent Discoveries Protocol, and noted that if engineering plans change or additional ground disturbing activities were necessary, Mark Arsenault should be contacted for further information. Subsequently, he was contacted to perform a secondary survey of the expanded project area to the north to provide cultural resources clearance for an additional impact area associated with the proposed 3,900-SF propagation greenhouse. The secondary survey was completed on November 26, 2020, and did not identify any cultural resources within the additional impact area or 600-foot buffer. No Impact.

Energy: The project is for outdoor cannabis cultivation with on-site drying and off-site processing. The project is conditioned to develop 100 percent of its power from renewable energy sources. Less than significant impact.

Geology and Soils: No new structures are proposed that would expose people to risk of life from earthquakes. The project occurs on flat land that has historically been used for agriculture. No significant grading will occur, and topsoil is preserved through the use of annual rotation and cover cropping.

Greenhouse Gas Emissions: The project is conditioned to develop 100 percent of its power from renewable energy sources. Less than significant impact.

Hazards and Hazardous Materials: The project will store fertilizers, herbicides and fuel for use in farm equipment existing storage structures. All hazardous materials are stored in a locked area with secondary containment in accordance with applicable regulations. The project does not expose the public to hazards. The project would not impair emergency response or create a significant risk from wildfire. Less than significant impact.

Hydrology and Water Quality: All irrigation will be sourced from rainwater catchment. The project will not degrade any water sources or contribute to sedimentation as a Site Management Plan has been prepared consistent with state Water Board requirements to protect water quality and prevent erosion. Less than significant impact.

Land Use and Planning: The project proposes an agricultural activity on a parcel zoned for Agriculture. The project will not physically divide an established community or result in a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. No impact.

Mineral Resources: No mining is proposed. The project will not result in the loss of availability of a known mineral resources that would be of value to the region and the residents of the state. The project will not result in the loss of availability of a locally important mineral resource recover site. No impact.

Noise: The project is located in actively managed agricultural land. The area has been in agricultural production for more than 10 years. Noise sources from the operation will include typical farm equipment. The primary source of noise may be only during emergencies as a result

of the emergency backup generator, which will be kept in a noise containment structure. There is no reason to believe the noise source will be increased substantially onsite. The project will not result in the generation of excessive groundborne vibration or noise levels. No impact.

Population and Housing: The project is for outdoor cannabis cultivation. No housing is proposed nor is any removal of housing proposed. The project will not induce substantial unplanned population growth in an area nor displace substantial numbers of existing people or housing necessitating the construction of replacement housing. No impact.

Public Services: The project will not increase the need for fire or law enforcement services. The project is not within 600 feet of a park or a school. No impact.

Recreation: The project site is private property and contains no recreational facilities nor are recreational facilities accessed through the property. No impact.

Transportation: Up to three workers are anticipated during peak operations. Access to the site is via a private driveway that does not serve other neighbors which is accessed from Dyerville Loop Road, a County maintained road. Dyerville Loop Road is a paved, Category 4, County-maintained roadway. A self-certified Road Evaluation Report (Form A.) for the 1.0-mile access route was prepared by Antonio Petrushevski, and a photo-documented report was prepared by ETA Humboldt in January 2021 (Attachment 3H) that indicates the roadway can accommodate increased traffic given the 17 documented turnouts, the rocked surface, and the 16-to-20-foot road widths. In addition to the self-certified RER and the photo-documented report by ETA, a Road Evaluation Report prepared for an adjacent cannabis operation that utilizes the same roadway (PLN-12601-CUP) was prepared by a licensed engineer, which found that the private roadway is functionally equivalent to a Road Category 4. Public Works, Land Use Division, conditionally approved the project on 7/21/21, and their recommended improvements have been made conditions of approval. Less than significant impact.

Tribal Cultural Resources: No cultural resources were identified on the site according to a Cultural Resource investigation (see Cultural Resource Section). No impact.

Utilities and Service Systems: Solid waste is taken to the Eel River Transfer Station in an amount the service station is capable of handling. Processing activities will be supported by an approved onsite wastewater treatment system. Seasonal/outdoor cultivation sites may be supported by portable toilets. Applicant must obtain a permit for and install an approved onsite wastewater treatment system to support any proposed processing location(s) and either install approved septic systems or provide portable toilets to cultivation areas. Less than significant impact.

Wildfire: The project will not interfere with any evacuation plan. There will be no significant new structures that will increase the risk of wildfire other than the 800 square foot processing building which will comply with all building and fire codes. Less than significant impact.

No changes are proposed for the Final EIR recommended mitigations. The proposal to authorize the project to bring the operation into compliance with the CCLUO is fully consistent with the impacts identified and adequately mitigated in the Final EIR. The project as conditioned to

implement responsible agency recommendations, results in no significantly adverse environmental effects beyond those identified in the Final EIR.

In reviewing the application for consistency with the adopted Final EIR, the County considered the following information and studies, among other documents:

- Plot Plans with prime agricultural soils prepared by ETA Humboldt dated 11/22/21.
- Revised Cultivation and Operations Plan prepared by ETA Humboldt dated 10/20/21.
- Water Irrigation and Storage Plan prepared by ETA Humboldt dated 11/30/21.
- Energy Generation and Consumption Plan prepared by ETA Humboldt dated 10/22/21.
- Right to Divert and Use Water, Registration H508360, Certificate H100577, with the State Water Resources Control Board (State Water Board), Division of Water Rights, dated 9/19/19.
- Site Management Plan prepared by ETA Humboldt dated 10/19/21 for the State Water Board Cannabis Cultivation Policy.
- Notification of Lake or Streambed Alteration No. 1600-2018-0695-R1 from the California Department of Fish and Wildlife dated 10/12/2020.
- Prime Agricultural Soil Assessment of the grassland meadows prepared by Dirty Business Soil in 5/22/18.
- A Biological Assessment for Commercial Cannabis Cultivation prepared by O'Brien Biological Consultants prepared after a site visit on 1/17/20.
- Wetland Delineation prepared by Kyle Wear, botanical consultant, dated January 2019.
- Botanical Survey Results prepared by Kyle Wear, botanical consultant, dated October 2021.
- Road Evaluation Report prepared by Antonio Petrushevski of Mayers Flat Farms, LLC of inspection date of 1/5/21 and photo-documentation provided by ETA Humboldt dated January 2021.
- Public Works conditional approval dated 7/21/21.
- Cultural Resources Investigation Report prepared in May 2018 and an Addendum Report prepared in December 2020 by Mark Arsenault, MA, RPA, Principal Investigator, Arsenault & Associates, Sacramento, CA.

Other CEQA Considerations

Staff suggests no changes for the revised project.

EXPLANATION OF DECISION NOT TO PREPARE A SUPPLEMENTAL MITIGATED NEGATIVE DECLARATION OR ENVIRONMENTAL IMPACT REPORT

See **Purpose** statement above.

In every impact category analyzed in this review, the projected consequences of the current project proposal are either the same or less than significantly increased than the initial project for which the EIR was adopted.

Project impact analysis of conformance to the Final Environmental Impact Report Mitigation Monitoring and Reporting Program

Mitigation Measure 3.3-4: Prohibit burning of cannabis and other vegetative material.

- Condition of project approval.

Mitigation Measure 3.4-1a: Pre-approval biological reconnaissance surveys.

- Biological Assessment Report prepared by O'Brien Biological Consultants.

Mitigation Measure 3.4-1b: Special-status amphibian preconstruction surveys.

- No construction is proposed within riparian areas. Biological Assessment Report identifies that the project as proposed will not impact any of the potential amphibian habitat.

Mitigation Measure 3.4-1c: Western pond turtle preconstruction surveys and relocation.

- The western pond turtle habitat likely does occur within the project site however the Biological Assessment Report identifies that no habitat is located in the areas of proposed disturbance.

Mitigation Measure 3.4-1d: Nesting raptor preconstruction survey and establishment of protective buffers.

- Habitat raptors does exist in the vicinity however no nesting or roosting habitat is proposed for removal and proposed project features are well outside of recommended buffers from nesting or roosting species.

Mitigation Measure 3.4-1e: Northern spotted owl preconstruction habitat suitability surveys and determination of presence or absence.

- Habitat for northern spotted owl was identified in the vicinity of the project however the NSO assessment prepared by Troy Leopardo found that there is no presence within at least 0.25 miles and the project as proposed would not alter or impact and NSO habitat or have adverse impacts to NSO provided that noise and light attenuation measures are adhered to..

Mitigation Measure 3.4-1f: Special-status nesting bird surveys and establishment of protective buffers.

- While habitat was identified in the vicinity of the proposed project per the Biological Assessment Report all proposed construction activities are likely outside of recommended buffers. Nonetheless, a condition of approval to implement this measure is added to the project that requires nesting bird surveys to be completed and appropriate buffers established if any vegetation removal occurs during the nesting season.

Mitigation Measure 3.4-1g: Marbled murrelet preconstruction habitat suitability surveys and establishment of protective buffers.

- No presence or habitat was identified in the immediate vicinity of the proposed project per the Biological Assessment Report. The closest optimal habitat exists approximately 1.7 miles to the west.

Mitigation Measure 3.4-1h: Noise reduction.

- There is one generator on site for emergency use only that will be required to be housed in a noise containment structure. All power shall be provided by renewable energy and the applicant has proposed solar arrays to power the operation.

Mitigation Measure 3.4-1i: American badger preconstruction survey and establishment of protective buffers.

- While potential habitat exists no presence or burrows were identified on the project site per the Biological Assessment Report.

Mitigation Measure 3.4-1j: Fisher and Humboldt marten preconstruction survey and preservation of active den sites.

- Habitat for fisher was identified in the vicinity of the project. No tree removal is proposed as part of the project. The Biological Assessment Report determined the project would not impact the species as the potential fisher habitat is not in the area of proposed activities.

Mitigation Measure 3.4-1k: Preconstruction bat survey and exclusion.

- No presence or habitat was identified in the vicinity of the proposed project per the Biological Assessment Report.

Mitigation Measure 3.4-1l: Preconstruction vole survey and relocation.

- Habitat for Sonoma tree vole was identified in the vicinity of the project. The project would have no impact as the project is not located within dense Douglas fir habitat (preferred food).

Mitigation Measure 3.4-3a: Special-status plants.

- No special status plant species or sensitive natural communities were found within the area proposed for disturbance. It has been determined that there will be no impacts to special status plant species or sensitive natural communities.

Mitigation Measure 3.4-3b: Invasive plant species.

- The project includes an invasive species control plan that satisfies the requirements of this mitigation measure.

Mitigation Measure 3.4-4: Sensitive natural communities, riparian habitat, and wetland vegetation.

- No special sensitive natural communities were found within the project area. There was a Wetland and Watercourse Delineation Report which identified wetlands on the property including in the vicinity of the proposed activities, however all recommended and regulated buffers from wetlands and watercourses will be maintained with the exception of the rainwater catchment pond that is located within the regulated buffer of two ephemeral wetlands. No sensitive habitat associated with the wetlands would be impacted from the existing pond and the pond allows for the discontinuation of the previous surface water diversion, thereby enhancing riparian flows in the area.

Mitigation Measure 3.4-5: Waters of the United States.

- There was a Wetland and Watercourse Delineation Report prepared the project area. The

site plan developed for the project depicts appropriate buffers for the wetland and all the watercourses. There is no development proposed within the wetlands and no impacts to wetlands are anticipated. No impacts to waters of the United States will occur.

Mitigation Measure 3.4-6a: Implement Mitigation Measure 3.4-5: Waters of the United States.

- See Mitigation Measure 3.4-5 above.

Mitigation 3.4-6b: Retention of fisher and Humboldt marten habitat features.

- See Mitigation Measure 3.4-1j above.

Mitigation Measure 3.5-1: Protection of historic resources.

- A Cultural Resources Survey was prepared which found no evidence of historic resources on the property.

Mitigation Measure 3.5-2: Avoid potential effects on unique archaeological resources.

- A cultural resources investigation occurred for the project site. The investigation did not identify any archaeological or cultural resources within the project area and concluded that the project is therefore not anticipated to have an adverse effect on significant cultural or archaeological resources. Project conditions of approval are incorporated regarding an inadvertent discovery protocol to protect cultural and archaeological resources.

Mitigation Measure 3.6-5 Protection of discovered paleontological resources.

- See Mitigation Measure 3.5-2 above.

Mitigation Measure 3.7-2a: Prepare Environmental Site Assessments.

- Project does not propose development of commercial cannabis facilities on existing commercial, business park, or industrial sites.

Mitigation Measure 3.7-2b: Prepare a Hazardous Materials Contingency Plan for Construction Activities.

- See Mitigation Measure 3.7-2a above.

Mitigation Measure 3.8-2: Minimum Size of Commercial Cultivation Activities.

The subject parcel exceeds the minimum parcel size for the proposed project at full buildout per Section 55.4.6.5.9(d) of the CCLUO.

Mitigation Measure 3.8-3: Annual groundwater monitoring and adaptive management.

- The subject parcel exceeds 10 acres in size and is not subject to the requirements of Section 55.4.12.9 of the CCLUO regarding well drawdown testing.

Mitigation Measure 3.8-4: Provision of drainage facilities to attenuate increases in drainage flows.

- A Site Management Plan was prepared for the proposed project. The Site Management Plan includes best management practices for erosion control and sediment capture mechanisms, as well as road maintenance and runoff activities. To further prevent runoff to riparian areas, water conservation and containment measures will be implemented

including the use of drip irrigation to prevent excessive water use, and the maintenance of a stable, vegetated buffer between the cultivation area and riparian zone. The Site Management Plan includes corrective actions to reduce sediment delivery from roads on the property, including rocking roads, replacing culverts, installing rolling dips and water bars, and unplugging ditch relief culverts. Maintaining enrollment with the State Water Resources Control Board (SWRCB) General Order NO WQ 2019-0001-DWQ is a condition of project approval.

Mitigation Measure 3.8-5: Implement water diversion restrictions and monitoring and reporting requirements.

- No water diversion will be utilized for the proposed project.

Mitigation Measure 3.10-1: Implement construction-noise reduction measures.

- Condition of project approval.

Mitigation Measure 3.12-2: Proper design of highway access points.

- Project is accessed off a county-maintained road.

Mitigation Measure 3.13-1a: Prepare a treatment program for all new indoor cultivation and non-cultivation activities.

- The proposed project is not for new commercial indoor cultivation or a non-cultivation cannabis operation.

Mitigation Measure 3.13-1b: Verification of adequate wastewater service and necessary improvements for public wastewater systems.

- The property is not serviced by a public wastewater system.

Mitigation Measure 3.13-2: Verification of adequate water supply and service for municipal water service.

- The property is not serviced by a municipal water service.

Based upon this review, the following findings are supported:

1. The proposed project will permit an existing cannabis operation and bring the operation into compliance with County and State requirements as well as to permit an expansion consistent with all of the applicable standards developed to adequately mitigate environmental impacts.
2. The circumstances under which the project was approved have not changed substantially. There are no new significant environmental effects and no substantial increases in the severity of previously identified effects.
3. For the current proposed project, there has been no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous MND was adopted as complete.

CONCLUSION

Based on these findings it is concluded that an Addendum to the certified MND is appropriate to address the requirements under CEQA for the current project proposal. All of the findings, mitigation requirements, and mitigation and monitoring program of the MND, remain in full force and effect on the original project.