

**ATTACHMENT 3**

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

**Coastal Commercial Cannabis Land Use Ordinance Environmental Impact Report (EIR)  
(State Clearinghouse # 2017042022), May 8, 2018**

**APN 308-081-002, 3003 Table Bluff Road Loleta, County of Humboldt**

**Prepared By  
Humboldt County Planning and Building Department  
3015 H Street, Eureka, CA 95501**

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## Background

### Modified Project Description and Project History –

The Coastal Commercial Cannabis Land Use Ordinance (CCCLUO) updated the County's existing Commercial Medical Marijuana Land Use Ordinance (Section 313-55.4 and 314-55.4 of Chapter 3 of Division 1 of Title III of the County Code) as well as repeal of the Medical Cannabis Testing and Research Laboratories provisions and on-site consumption prohibition found in Sections 313-55.3.15, 314-55.3.15, 313-55.3.11.7, and 314-55.3.11.7 of Division 1 of Title III of the County Code, respectively. These regulations establish land use regulations for the commercial cultivation, processing, manufacturing, distribution, testing, and sale of cannabis within the County. These regulations were developed in concert with the Final Environmental Impact Report (EIR) that was adopted for the ordinance in order 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 CCCLUO would mitigate the impacts of new cannabis operations by establishing specific regulations for location and conditions under which the development of new commercial cannabis could occur. The EIR prepared for the CCCLUO also established local land use regulations for new commercial cannabis operations in the unincorporated area of the County that ensure the health and safety of residents, employees, County visitors, neighboring property owners and end users of cannabis. The proposed project is consistent with all regulations within the CCCLUO and all mitigation measures of the EIR. Current project was contemplated by the EIR and compliance with the provisions of the CCCLUO will fully mitigate all environmental impacts of the project to a less than significant level.

The modified project involves a Modification to an approved Coastal Development (PLN-2021-17381) to increase water usage for a commercial cannabis cultivation. The cultivation operation will use up to 103,000 gallons of water per year. Per application materials the applicant anticipates capturing a maximum 176,560 gallons of water per year through rainwater catchment, dehumidifiers, and air conditioning units. 20,000 gallons of water storage have been installed on the property under the previously approved permit. The applicant is also seeking a Coastal Development Permit and Zoning Clearance Certificate for self-distribution and non-flammable manufacturing activities on site. Proposed manufacturing activities include trimming, rolling, and packaging cannabis, and will only include cannabis produced onsite. There are no anticipated changes to traffic volumes, power needs, or staffing needs. All proposed new activities will occur within the footprint of an existing permitted non-residential structure. A review of WebGIS determined that the project setting is located on a parcel that has been determined to be low instability and having a moderate fire severity. Further analysis determined that the

project parcel does not have any documentation of rare or sensitive species occurring on-site.

The modified project is consistent with the adopted EIR for the CCCLUO because it complies with all standards of the CCCLUO which were intended to mitigate impacts of cultivation activities. These include sourcing all power from 100% renewable energy source, ensuring supplemental lighting and security lighting adheres to Dark Sky Association standards and ensuring project related noise does not exceed 3 decibels above ambient noise levels at the property line.

**Purpose** - Section 15164 of the California Environmental Quality Act (CEQA) provides that the lead agency shall prepare an addendum to a previously certified Environmental Impact Report (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 which 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**

A review of Appendix G impacts:

**Aesthetics:** The modified project is for increased water usage for a permitted commercial cannabis cultivation operation and self-distribution and manufacturing activities within an existing enclosed building. The modified project will not significantly impact scenic vistas or public views. No new structures or ground disturbance are proposed. The project is consistent with the visual character of the area. Per the performance standard of the CCLUO, the project will not create a source of light or glare. No impact.

**Agriculture and Forestry Resources:** The project parcel is zoned Agriculture Exclusive, and no new cultivation is proposed. The project will utilize agricultural land for agricultural activities and related ancillary activities as contemplated in the EIR. The project will not convert prime farmland or conflict with existing zoning for agricultural use or Williamson Act contract. No tree removal is proposed; therefore, the project will not result in the net loss of forest land or conversion of forest land to non-forest use. No impact.

**Air Quality:** The modified project is for increased water usage for a permitted commercial cannabis cultivation operation and self-distribution and manufacturing activities within an existing enclosed building. The project will not expose sensitive receptors to pollutants or create objectionable odors affecting a substantial number of people. The parcel is accessed via a paved county-maintained road, and no increased traffic is anticipated as part of the project. The use of roads for this project is not a substantial change or additional significant impact not considered under the EIR. Less than significant impact.

**Biological Resources:** The modified project is for increased water usage for a permitted commercial cannabis cultivation operation and self-distribution and manufacturing activities within an existing enclosed building. All new and modified activities will take place within an existing enclosed structure, and no new ground disturbance is proposed. The proposed increase in irrigation will be accommodated through the collection of water via dehumidifiers and air conditioning units within the existing structure. Less than significant impact.

**Cultural Resources:** The modified project is for increased water usage for a permitted commercial cannabis cultivation operation and self-distribution and manufacturing activities within an existing enclosed building. No new structures or ground disturbance are proposed, and the project is subject to the original conditions of approval, including inadvertent discovery protocol. The project does not involve any known historical

resource. No impact.

**Energy:** Grid power is provided via PG&E, and the applicant will source power through the Redwood Coast Energy Authority (Re-Power Plus) program or a suitable equivalent source subject to approval of the Planning and Building Department. Grid power supplied through renewable energy programs does not conflict with or obstruct any state or local plan for renewable energy or energy efficiency. No impact.

**Geology and Soils:** No new structures are proposed that would expose people to risk of life from earthquakes. The cultivation area will take place in an existing permitted non-residential structure. No new grading or structures are proposed. No impact.

**Greenhouse Gas Emissions:** Grid power is provided via PG&E, and the applicant will source power through the Redwood Coast Energy Authority (Re-Power Plus) program or a suitable equivalent source subject to approval of the Planning and Building Department. No traffic changes are anticipated as part of this project. The project would not result in significant sources of greenhouse gas emissions. Less than significant impact.

**Hazards and Hazardous Materials:** All fertilizers and pesticides will be stored and labeled in secured cabinets located in the building. Any potentially hazardous substances will be labeled and stored as required by OSHA regulations. Applicant will follow guidelines set forth by State of California Agricultural Department Personnel Pesticide Application License. Hazard Communication and all SDS (Safety Data Sheets) will be maintained and kept onsite. The project does not expose the public to hazards. The project is in an area rated as moderate fire risk, however no significant wood framed structures will be constructed as part of this project. The project would not impair emergency response or create a significant risk from wildfire. Less than significant impact.

**Hydrology and Water Quality:** The project will utilize an existing structure. No modifications are proposed that will result in net additions to the existing stormwater system. The subject property downhill from the existing structure has an average slope of 1-3% and is entirely well-draining. The applicant has submitted a Notice of Applicability (NOA) Enrollment Type (Enrollee – Waiver) from the State Water Resources Control Board (SWRCB). The project is subject to the conditions of approval applied to the original permit, which includes maintaining enrollment in the State Water Resources Control Board order no. WQ 2019-0001-DWQ, if applicable, or any substantially equivalent rule that may be subsequently adopted by the County of Humboldt or other responsible agency. The continued cultivation does not substantially alter the existing drainage pattern of the site or area and the project site is not located within a flood hazard or tsunami zone. No impact.

**Land Use and Planning:** The project to continue an existing operation 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:** The modified project to continue an existing operation 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 modified project to continue an existing operation will not increase existing noise levels from the operation which includes typical farm equipment. The project will not result in the generation of excessive groundborne vibration or noise levels. The project is subject to the conditions of approval of the original permit, including limiting project generated noise to 3 decibels above ambient noise levels. Less than significant impact.

**Population and Housing:** The modified project is for a modification to an existing indoor cannabis cultivation and self-distribution and manufacturing activities. 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 continued operation of existing cannabis cultivation, including the increase in irrigation as proposed, self-distribution, and non-flammable manufacturing activities, 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:** The modified project is for increased water usage for a permitted commercial cannabis cultivation operation and self-distribution and manufacturing activities within an existing enclosed building. No increase in staffing needs or traffic is anticipated. The property is accessed via a paved county maintained road. The project site will also have adequate emergency access. Less than significant impact.

**Tribal Cultural Resources:** The modified project is for increased water usage for a permitted commercial cannabis cultivation operation and self-distribution and

manufacturing activities within an existing enclosed building. No new structures or ground disturbance are proposed, and the project is subject to the original conditions of approval, including inadvertent discovery protocol. No impact.

**Utilities and Service Systems:** Garbage will be collected daily and removed from the site weekly by garbage service. Cannabis refuse will be sequestered and composted until unrecognizable, or removed by an authorized service, as required by State Cannabis Regulations. Recyclables will be separated from non-recyclables and disposed of appropriately. All refuse will be stored in covered water and pest resistant containers located and inside the building. Water for irrigation is sourced from rainwater catchment and captured by dehumidifiers and air conditioning units. Runoff will be collected and filtered for reuse. Runoff unable to be reused will be held in a storage tank and removed by a local wastewater company (Steve's Septic Service, McKinleyville CA). 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. No impact.

No changes are proposed for the Final EIR recommended mitigations. The proposal to authorize the project and minor improvements necessary to bring the operation into compliance with the CCCLUO is fully consistent with the impacts identified and adequately mitigated in the Final EIR. The project as conditioned results in no significantly adverse environmental effects beyond those identified in the Final EIR.

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

- Operations Plan prepared for PLN-2021-17381, dated January 6, 2022.
- Operations Plan Addendum
- Site Plan prepared by the applicant dated October 31, 2025.
- Irrigation Schedule

### **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.**

- Cannabis refuse will be sequestered and composted, or removed by an authorized service, as required by State Cannabis Regulations.

**Mitigation Measures 3.4-1a through 3.4-6(b): biological resource protections.**

- There are no watercourses located on the subject property. A review of the California Natural Diversity Database (CDDNB) indicates that the property has potential habitat for black-crowned night heron. However, the project will take place within an existing enclosed structure, and no new development is proposed. The nearest Northern Spotted-Owl activity center is 3.9 miles to the southeast, and the nearest mapped Marbled Murrelet habitat is 6.5 miles to the east. No biological evaluation report was requested as part of the proposed modification due to the limited scope of work.

**Mitigation Measure 3.5-1: Protection of historic resources.**

- No structures on site are considered historic resources. No changes to the exterior of any structures are proposed. The project is limited to an increase in irrigation water, self-distribution, and non-flammable manufacturing including drying, trimming, pre rolls, and packaging.

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

- No new ground disturbance is proposed. Conditions of approval for the original permit remain in full force and effect, including 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 as required by the CCCLUO.

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

- The project is not proposing use of a well for irrigation and is therefore not subject to the requirements regarding well drawdown testing.

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

- The project will utilize an existing structure. No modifications are proposed that will result in net additions to the existing stormwater system. The subject property downhill from the existing structure has an average slope of 1-3% and is entirely well-draining. The applicant has submitted a Notice of Applicability (NOA) Enrollment Type (Enrollee – Waiver) from the State Water Resources Control Board (SWRCB). The project is subject to the conditions of approval applied to the original permit, which includes maintaining enrollment in the State Water Resources Control Board order no. WQ 2019-0001-DWQ, if applicable, or any substantially equivalent rule that may be subsequently adopted by the County of Humboldt or other responsible agency.

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.

- Garbage will be collected daily and removed from the site weekly by garbage service. Cannabis refuse will be sequestered and composted until unrecognizable, or removed by an authorized service, as required by State Cannabis Regulations. Recyclables will be separated from non-recyclables and disposed of

appropriately. All refuse will be stored in covered water and pest resistant containers located and inside the building. Water for irrigation is sourced from rainwater catchment and captured by dehumidifiers and air conditioning units. Runoff will be collected and filtered for reuse. Runoff unable to be reused will be held in a storage tank and removed by a local wastewater company (Steve's Septic Service, McKinleyville CA).

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:

**FINDINGS**

1. The proposed project will permit a new cannabis operation and bring the operation into compliance with county and state requirements intended 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 EIR was adopted as complete.

**CONCLUSION**

Based on these findings it is concluded that an Addendum to the previous Final EIR 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 EIR, remain in full force and effect on the original project.

There are no new significant environmental effects and no substantial increases in the severity of previously identified effects. 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 EIR was adopted as complete.