County of Sonoma
Permit & Resource Management Department
2550 Ventura Avenue, Santa Rosa, CA 95403
(707) 565-1900 FAX (707) 565-1103

Mitigated Negative Declaration

Publication Date:	4/22/2024
Public Review Period:	4/22 – 5/22/2024
State Clearinghouse Number:	#####
Permit Sonoma File Number:	UPC19-0012
Prepared by:	Haleigh Frye
Phone:	(707) 565-2477

Pursuant to Section 15071 of the State CEQA Guidelines, this proposed Negative Declaration and the attached Expanded Initial Study, including the identified mitigation measures and monitoring program, constitute the environmental review conducted by the County of Sonoma as lead agency for the proposed project described below:

Project Name:	UPC19-0012; Bloomfield Flowers LLC (Cannabis Cultivation)
Project Applicant/Operator:	Michael Agins, Owner and CEO of Bloomfield Flowers, LLC
Project Location/Address:	4707 Bloomfield Road, Petaluma
APN:	027-050-022
General Plan Land Use Designation:	Land Extensive Agricultural 160-acre density (LEA 160)
Zoning Designation:	Land Extensive Agricultural 160-acre density, Riparian Corridor 50-foot Development Setback Combining District (LIA B6 160, RC50/50)
Decision Making Body:	N/A
Appeal Body:	N/A
Project Description:	See Item III, below

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" or "Less than Significant with Mitigation" as indicated in the attached Initial Study and in the summary table below.

Table 1. Summary of Topic Areas

Topic Area	Abbreviation*	Yes	No
Aesthetics	VIS		X
Agricultural & Forest Resources	AG		X
Air Quality	AIR	X	
Biological Resources	BIO	X	
Cultural Resources	CUL		X
Energy	ENERGY		X
Geology and Soils	GEO		X
Greenhouse Gas Emission	GHG		X
Hazards and Hazardous Materials	HAZ		X
Hydrology and Water Quality	HYDRO		X
Land Use and Planning	LU		X
Mineral Resources	MIN		X
Noise	NOISE	X	
Population and Housing	POP		X
Public Services	PS		X
Recreation	REC		X
Transportation	TRANS		X
Tribal Cultural Resources	TCR		X
Utility and Service Systems	UTL		X
Wildfire	FIRE		X
Mandatory Findings of Significance	MFS		X

RESPONSIBLE AND TRUSTEE AGENCIES

Table 2 lists other public agencies whose approval is required for the project, or who have jurisdiction over resources potentially affected by the project.

Table 2. Agencies and Permits Required

Agency	Activity	Authorization
Department of Cannabis Control (DCC)	Cannabis cultivation and processing	State licensing, regulation, and enforcement of commercial cultivation activities, under Medicinal and Adult Use Cannabis Regulation and Safety Act (MAUCRSA) and DCC regulations (Bus. & Prof. Code, § 26102(a))
Regional Water Quality Control Board – North Coast (RWQCB)	Cannabis cultivation	Cannabis Cultivation Waste Discharge Regulatory Program or Waiver of Waste Discharge Requirements
State Water Resources Control Board (SWRCB)	Generating stormwater (construction, industrial, or municipal)	National Pollutant Discharge Elimination System (NPDES) requires the submittal of NOI
California Department of Fish and Wildlife (CDFW)	Cannabis cultivation	Lake or Streambed Alteration Agreement or Waiver; Fish and Game Code, Section 1600
Sonoma County Fire Prevention Division	Building and infrastructure construction (e.g., roads and fire suppression improvements) use of hazardous chemicals	Sonoma County Fire Safety Ordinance/California Board of Forestry Regulations and Hazardous Materials Regulations
Bay Area Air Quality Management District (BAAQMD)	Stationary air emissions/ Green House Gas Emissions	BAAQMD Rules and Regulations

ENVIRONMENTAL FINDING:

Based on the evaluation in the attached Initial Study, I find that the project described above will not have a significant adverse impact on the environment, provided that the mitigation measures identified in the Initial Study are included as conditions of approval for the project and a Mitigated Negative Declaration is proposed. The applicant has agreed in writing to incorporate identified mitigation measures into the project plans.

[redacted]

_____

Prepared by: Haleigh Frye, Project Planner April 22, 2024

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Initial Study

Sonoma County Permit and Resource Management Department
2550 Ventura Avenue, Santa Rosa, CA 95403
(707) 565-1900 FAX (707) 565-1103

I. INTRODUCTION

Bloomfield Flowers, LLC proposes to operate a commercial cannabis operation including centralized processing and up to 15,000 square feet of cultivation, in addition to ancillary processing of site grown cannabis and accessory propagation, as permitted by the Sonoma County Cannabis Ordinance. A referral letter was sent to the appropriate local, state, and federal agencies and interest groups who may wish to comment on the project.

This report is the Initial Study required by the California Environmental Quality Act (CEQA). The report was prepared by Haleigh Frye with the Sonoma County Permit and Resource Management Department, Project Review Division. Information on the project was provided by Bloomfield Flowers, LLC. Technical studies provided by qualified consultants, other reports, documents, maps, and studies referred to in this document are available for review through the Project Planner, or the Permit and Resource Management Department (Permit Sonoma) Records Section.

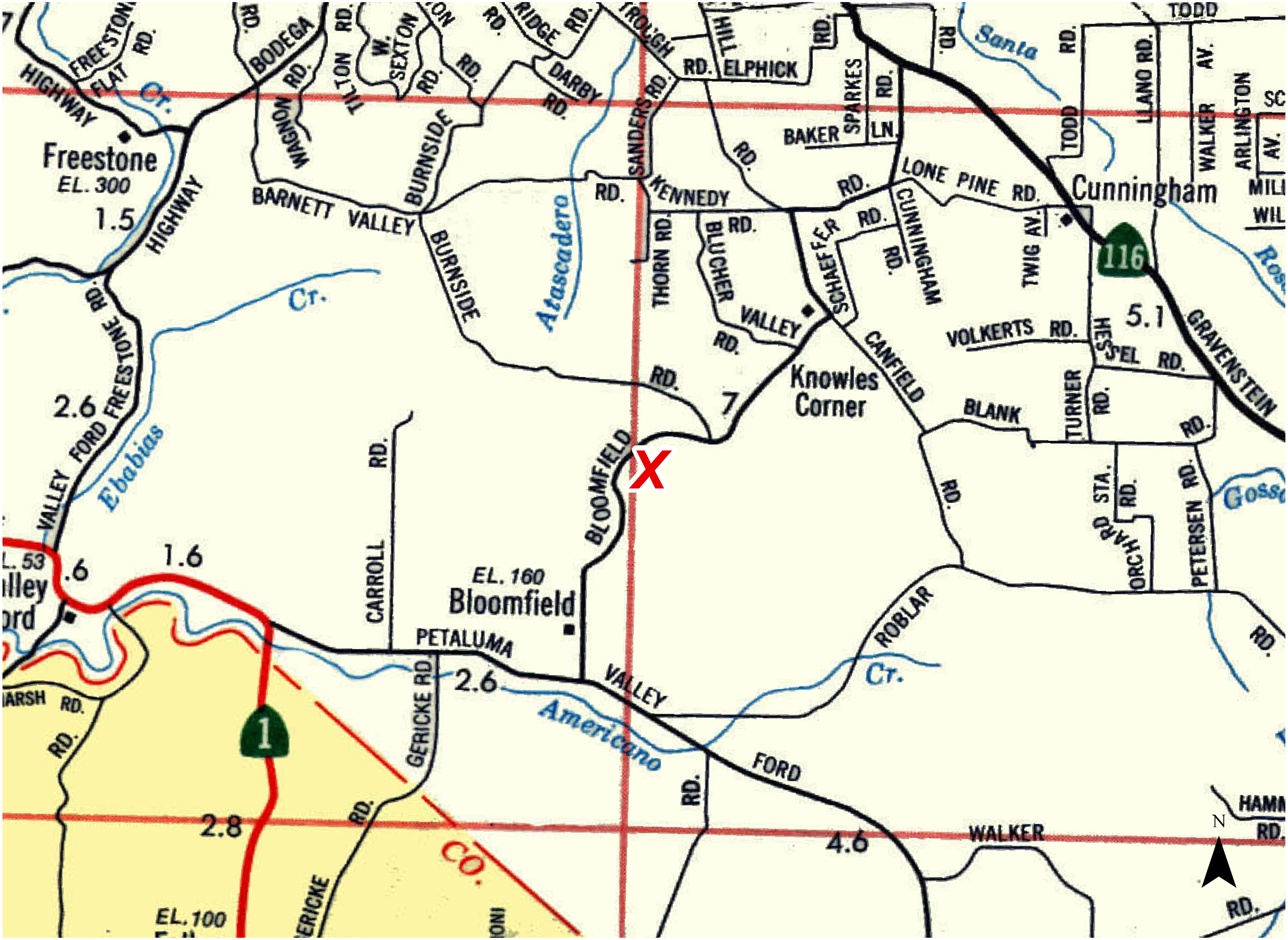
Please contact Haleigh Frye, at (707) 565-2477 or Haleigh.Frye@sonoma-county.org for more information.

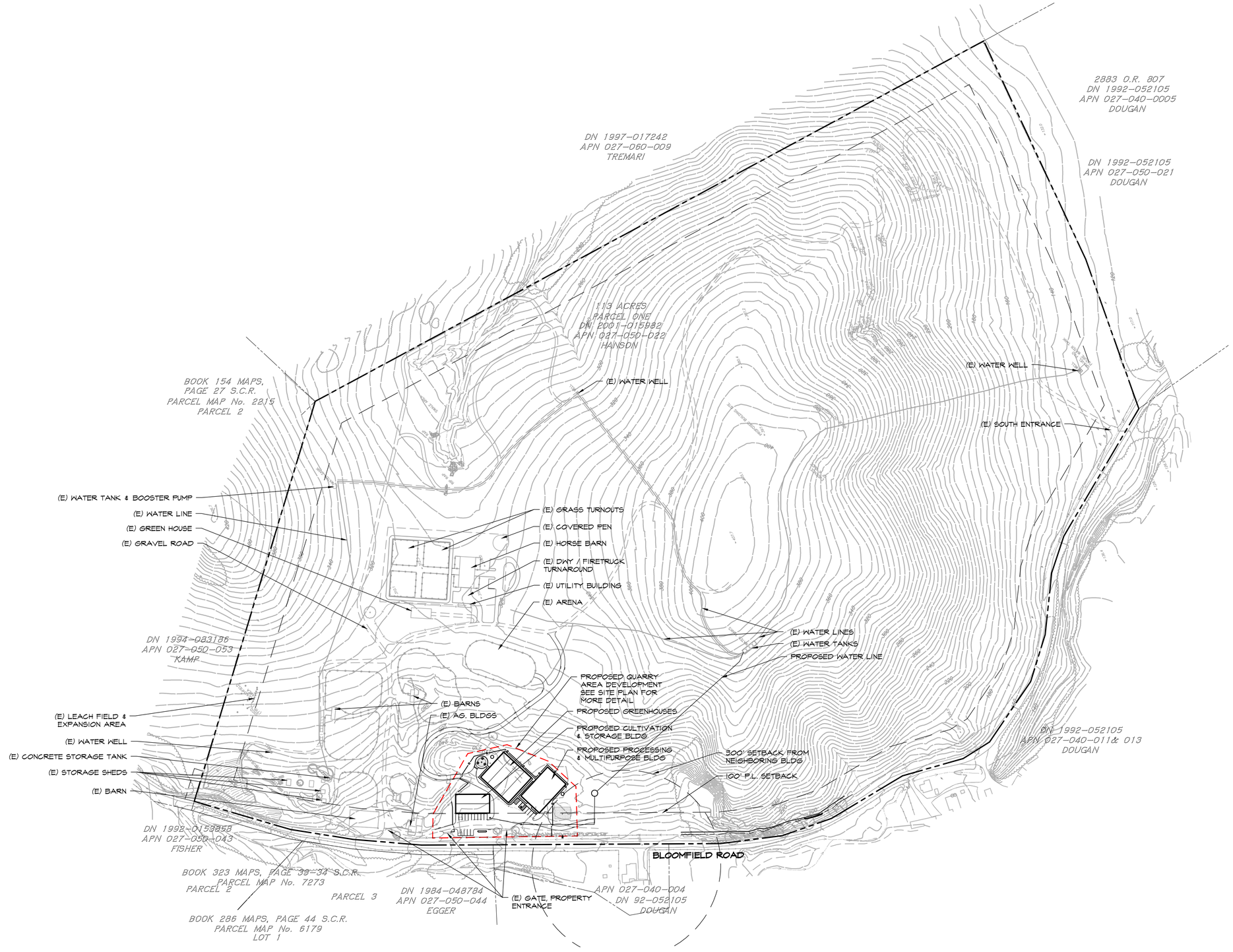
II. EXISTING FACILITY

The project site is located at 4707 Bloomfield Road, in an unincorporated agricultural area of Sonoma County, about 11 miles southwest of the City of Santa Rosa and about 9 miles northwest of the City of Petaluma (Figure 1 Vicinity Map).

The 113-acre parcel supports a variety of agricultural uses including a commercial vegetable farm, livestock grazing, and bee keeping. Existing structural development includes a horse arena, four barns, one greenhouse, and several outbuildings for the existing agricultural uses (Figure 2 Overall Site Plan). The project parcel contains three active water wells and several water storage tanks. The parcel is not subject to a land conservation contract. The proposed project site is located within the same footprint of a former rock quarry that was decommissioned prior to 1980 and has since been graveled and graded.

The parcel ranges topographically due to a large hill on the southwestern half of the parcel. Development and graded areas are concentrated on the northeastern portion of the parcel, which ranges from relatively flat to gently sloping. The dominant habitat types include ruderal grassland and disturbed lands. The parcel contains a small stand of Eucalyptus and some planted ornamental vegetation. A County designated riparian corridor boarders the parcel across Bloomfield Road, an unnamed tributary that drains south to Americano Creek.


Freestone
EL. 300
Cunningham
Knowles Corner
Bloomfield
EL. 160
EL. 100
EL. 53
Valley Ford
HIGHWAY
FREESTONE FLAT RD.
BODEGA
WAGNON RD.
TILTON RD.
W. SEXTON RD.
BURNSIDE RD.
BARNETT VALLEY RD.
DARBY RD.
RIDGE RD.
TROUGH RD.
SANDERS RD.
KENNEDY RD.
HILL RD.
ELPHICK RD.
BAKER
SPARKES LN.
LONE PINE RD.
CUNNINGHAM RD.
THORN RD.
BLUCHER VALLEY RD.
SCHAEFFER RD.
CANFIELD RD.
TWIG AV.
TODD RD.
LLANO RD.
WALKER AV.
ARLINGTON AV.
VOLKERTS RD.
HESSEL RD.
GRAVENSTEIN
BLANK RD.
TURNER RD.
ORCHARD STA. RD.
PETERSEN RD.
ROBLAR RD.
BLOOMFIELD RD.
CARROLL RD.
VALLEY FORD FREESTONE RD.
PETALUMA VALLEY FORD
GERICKE RD.
MARSH RD.
WALKER RD.
Atascadero
Ebabias Cr.
Cr.
Americano Cr.
Santa
Gosse
116
1
CO.
1.5
2.6
1.6
.6
2.6
2.8
4.6
5.1
7
X
N



NORTH

0 150 300
scale feet
1" = 150'

LEGEND

AD	AREA DRAIN
AE	ACCESS EASEMENT
AG	AGRICULTURE
APN	ASSESOR'S PARCEL NUMBER
BLDG	BUILDING
BSL	BUILDING SETBACK LINE
CB	CATCH BASIN
DI	DROP INLET
E	EXISTING
FG	FACE OF CURB
FD	FIELD DRAIN
FF	FINISH FLOOR
FS	FINISH SURFACE
FG	FINISH GRADE
FH	FIRE HYDRANT
FL	FLOW LINE
HP	HIGH POINT
IFO	IN FAVOR OF
PAE	PRIVATE ACCESS EASEMENT
PDE	PRIVATE DRAINAGE EASEMENT
PG	PAD GRADE
PSDE	PRIVATE SD EASEMENT
PSE	PRIVATE SEWER EASEMENT
RS	ROCK SWALE
SD	STORM DRAIN
SS	SEWER SERVICE
TC	TOP OF CURB
TG	TOP OF GRATE
WM	WATER METER
WS	WATER SERVICE

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15 THIRD STREET, SANTA ROSA, CA 95401
TEL (707) 542-6451 FAX (707) 542-5212

PROJECT No. 200108.00

OVERALL SITE MASTER PLAN

BLOOMFIELD FLOWERS

PETALUMA, CALIFORNIA

MARCH 02, 2021

SHEET 1 OF 1

III. PROJECT DESCRIPTION

Bloomfield Flowers, LLC., proposes to operate a commercial cannabis cultivation operation consisting of mixed light and indoor cultivation, centralized processing, and accessory propagation. The Sonoma County Cannabis Ordinance defines cannabis processing as, *all activities associated with drying, curing, grading, trimming, rolling, storing, packaging, and labeling of nonmanufactured cannabis.* Centralized processing refers to processing of cannabis grown onsite and within the local area. The operation would employ a maximum of 19 employees. No retail sales would be conducted at the facility. The cannabis operation would not be open to the public. New buildings would be constructed for the proposed cannabis operation.

Project Overview

The project proposal includes a total of 15,000 square feet of cultivation in the form of 5,000 square feet of indoor cultivation in a new 6,480 square foot structure and 10,000 square feet of mixed light cultivation in a new 12,960 square foot greenhouse, and both processing and accessory indoor propagation in a new 10,000 square foot structure (Figure 3 Site Plan). The proposed project site is located in a previously graded, flat, graveled area on portion of the parcel formerly used as a quarry that was decommissioned prior to 1980 (Figure 4 Site Photos). The project footprint occupies approximately 2.5-acres of the parcel and includes approximately 29,440-square feet of new permanent structures.

The mixed-light and indoor cultivation operations will operate year-round, seven days a week from 8:00 am to 5:00 pm, with extended hours during harvest typically 7:00 am to 7:00 pm. Deliveries and shipping activities would be limited to 8:00 am to 5:00 pm Monday through Friday. Management will be on-call 24 hours a day, seven days per week, to address any operational or emergency issues. The cannabis operation would hire up to 19 employees including full and part time staff. Distribution would be conducted by a licensed third-party company. The operation would not be open to the public.

Odor and Climate Control

All buildings used for project operation would be equipped with a self-contained, closed-loop climate control and air filtration system. All cultivation rooms would contain carbon filters and multiple fans to diminish cannabis odor. Carbon filters pull odor out of the air and neutralize odors that pass through the room. Additionally, carbon filters can filter out mold and mildew spores.

The odor filtration system would function in tandem with the climate control system. Air would be continually conditioned and re-circulated around the building interior by blowers to always maintain the exact desired temperature and humidity, year-round. The only exterior component of the system is the chiller unit, which would be ground mounted on a concrete pad outside the cultivation buildings on the east (property interior) side. The processing building would have similar closed loop climate control and carbon filter systems, but with standard residential HVAC units, instead of a commercial chiller.

Access and Parking Improvements

Access to the project site will be provided via two existing compacted gravel driveways directly off of Bloomfield Road. The entrances will be gated and secured with commercial-grade non-residential locks. The gated entrance will be designed to be at least 2-feet wider than the lane serving the gate and be located at least 30-feet from the roadway. The project includes 21 compacted gravel parking spaces including one accessible space and path of travel, and one delivery space in front of the proposed processing building. A fire truck turnaround is centrally located in front of all proposed structures.

All vendors and visitors would be required to check in with staff prior to entering the project site and will remain accompanied by staff while on site.

Water Supply and storage

Irrigation water will be supplied through a combination of groundwater and rainwater. Groundwater used for cannabis irrigation, will come from the sites primary domestic well located near the southwest corner of the parcel. Rainwater used for cannabis irrigation will be captured off the roofs of the proposed structures and stored in a proposed ~250,000-gallon steel water holding tank. The two other domestic wells onsite will be utilized as backup wells for the site. A 20,000-gallon water tank will be installed for potable water use, irrigation water supply, and emergency fire suppression use.

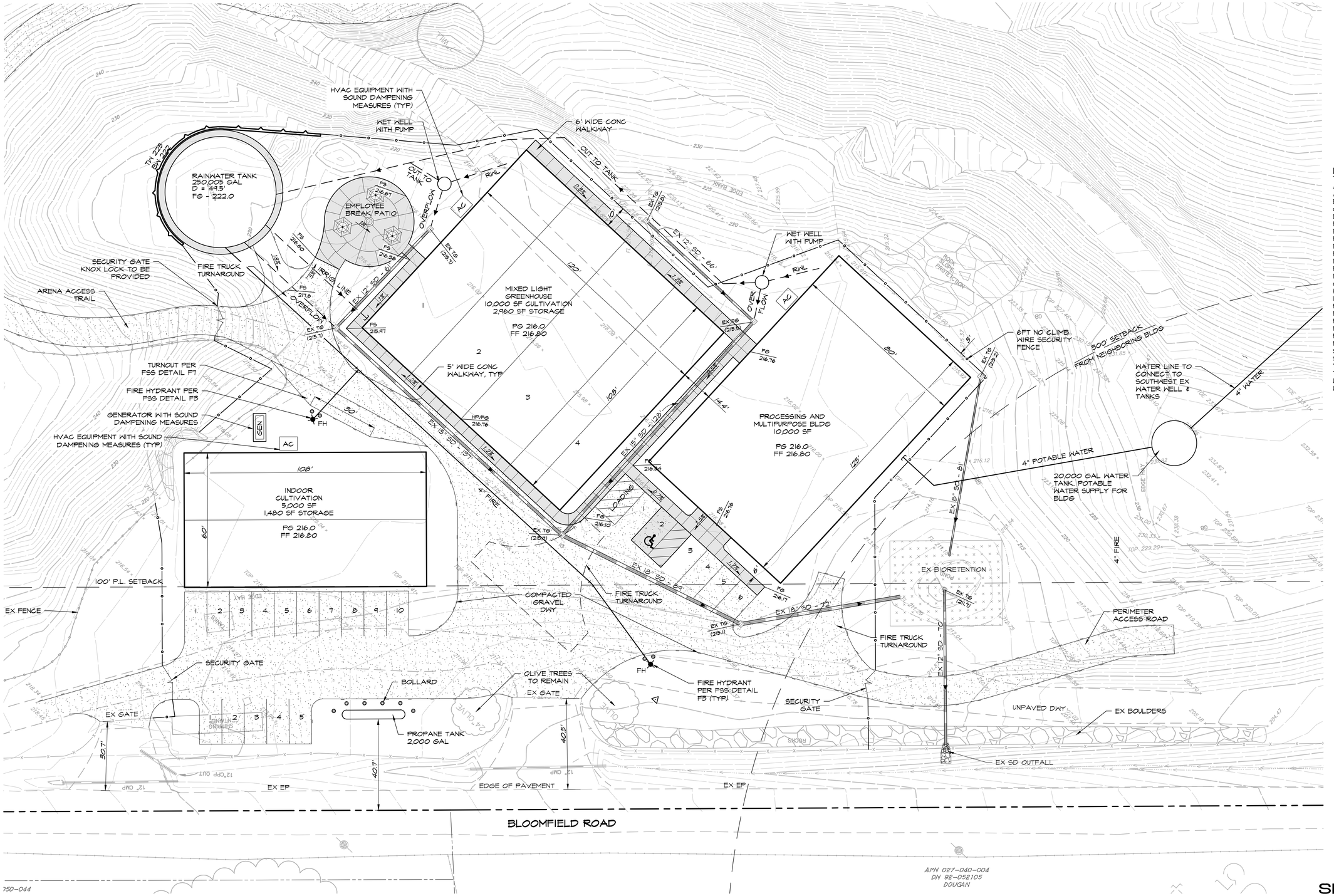
Solid Waste and Wastewater Disposal

Cannabis green waste will be disposed of via a specialized cannabis waste hauler. All other non-cannabis waste would be stored in lidded containers and transferred by an employee of the operation once a week to Sonoma County Solid Waste Transfer Facility located in Guerneville for proper disposal.

Wastewater from the project will be collected from sumps and reused. Domestic wastewater will be disposed of in the proposed septic system.

Construction

No existing structures would be used for the proposed project. The project would construct all new structures for project operation. Construction activities are expected to occur over one construction season. Project construction is anticipated to occur over 6-8 months, with work hours from 7:00 am to 7:00 pm Monday – Saturday as weather permits, and no construction grading or heavy construction during holidays. Rough grading activities would include building pad preparation and grading of roads and walkways to elevations shown on final improvement plans, and installation of sediment and erosion control features. Concrete slab foundations for each new structure would be constructed next, followed by vertical construction of new buildings. The final phase would include finished hardscapes, installation of fencing, landscaping, and water storage/irrigation systems. A variety of construction equipment would likely be used, including an excavator, bulldozer, backhoe, grader, cement mixers, pavers, and other general construction equipment.



NORTH

0 20 40
scale 1" = 20' feet

LEGEND

AD	AREA DRAIN
AE	ACCESS EASEMENT
BSL	BUILDING SETBACK LINE
CB	CATCH BASIN
DI	DROP INLET
FC	FACE OF CURB
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FG	FINISH GRADE
FH	FIRE HYDRANT
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PG	PAD GRADE
PSDE	PRIVATE SD EASEMENT
PSE	PRIVATE SEWER EASEMENT
RS	ROCK SWALE
SD	STORM DRAIN
SS	SEWER SERVICE
TC	TOP OF CURB
TG	TOP OF GRATE
WM	WATER METER
WS	WATER SERVICE
	SAVE TREE

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PROJECT No. 2001018.00

NOTES:

1. POTENTIAL COMPOST AREA TO BE LOCATED ON THE EASTERN PORTION OF PROPERTY.
2. IF FEASIBLE NEW WATER WELL TO BE INSTALLED TO SUPPLY WATER NEEDS.
3. TOTAL PROPOSED BUILDING SQUARE FOOTAGE - 29,440 SF

SITE PLAN

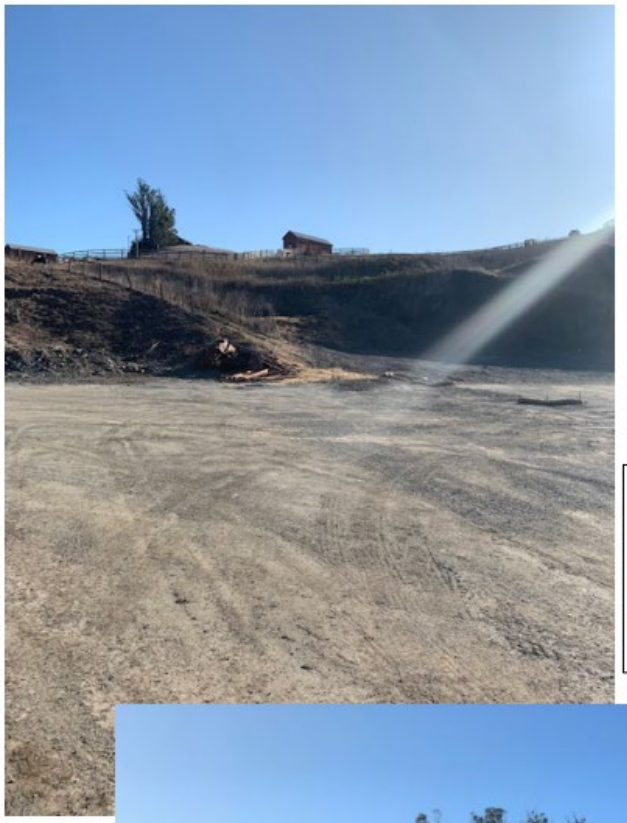
BLOOMFIELD FLOWERS

PETALUMA, CALIFORNIA

NOVEMBER 03, 2022

SHEET 1 OF 1

11/3/2022 4:36:01 PM Cindy Valladares G:\2001\2001018.00\Drawings\Exh\Quarry Use Permit\01018-CUP Quarry Plan Phase 1=WATER TANK2.dwg
[Xref files: 01018sp1-C3D; 01018-HC-C3D; 01018bdy-C3D]



Left: Looking back at quarry area, facing southeast.

Below: Project sight facing southwest with Bloomfield Road to the right.

Above: Project location facing southwest towards old quarry

Right: Close up of hardscape

4707 Bloomfield Road, Petaluma
UPC19-0012 Bloomfield Flowers, LLC

IV. SETTING

The project site is located within a rural agricultural area in southwest Sonoma County approximately 11 miles southwest of the City of Santa Rosa and about 9 miles northwest of the City of Petaluma, and about 1.5 miles east of the town of Bloomfield. Nearly all the surrounding land is open grassland and pasture with very low-density residential uses.

The parcel contains three existing onsite wells which supply water for the current agricultural uses and portable water supply for the parcel. The parcel does not contain an existing residence.

The General Plan Land Use Designation on the parcel is Land Extensive Agriculture with a 160-acre density. The site is also designated Land Extensive Agriculture by the Petaluma Dairy Belt Area Plan. The project is not located on an existing or proposed bikeway. The closest proposed Class II bikeway is Valley Ford Road approximately 1.5 miles to the south.

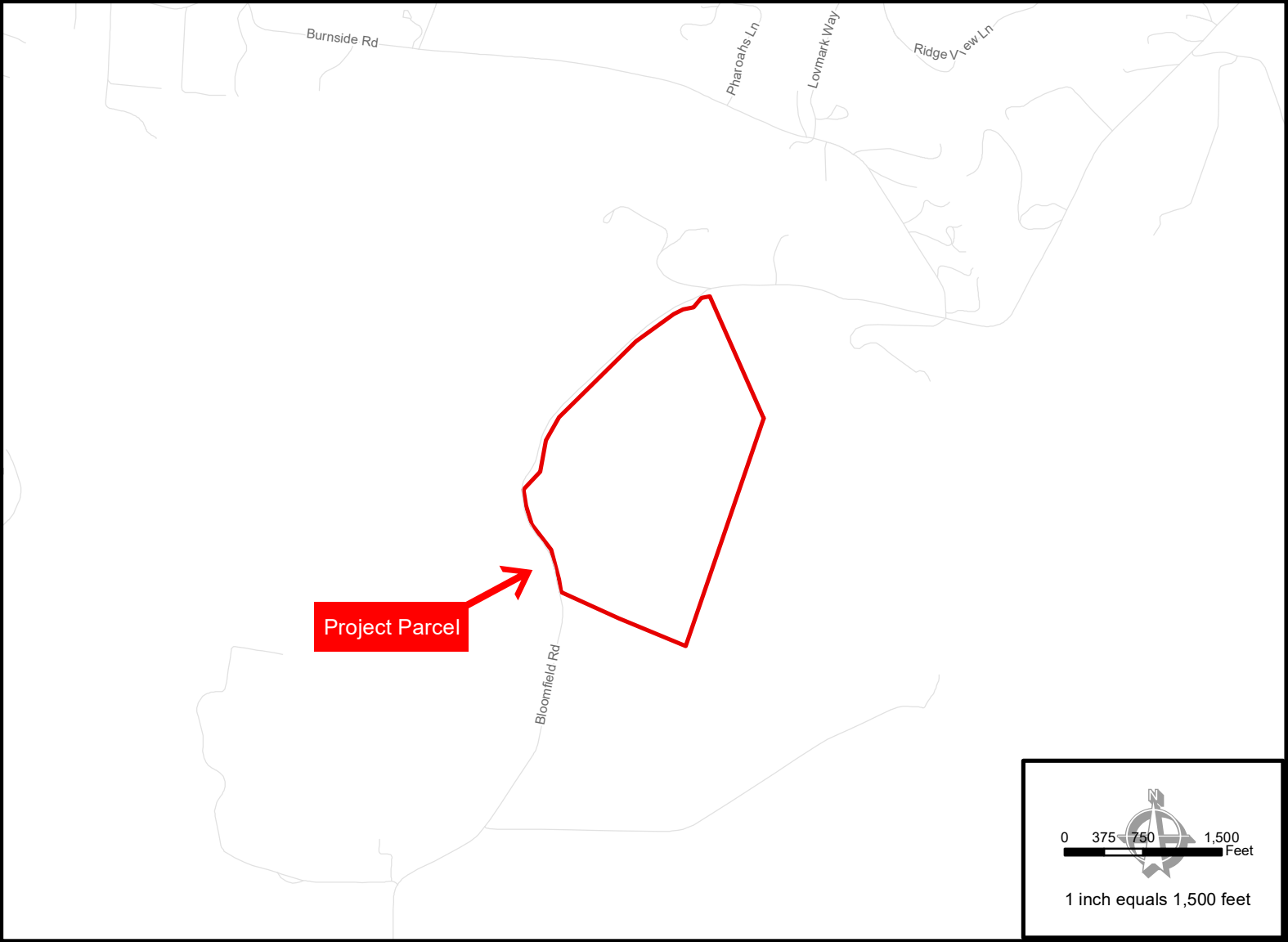
Regional access to the project site is from Bloomfield Road, which is identified as a Minor Collector.

According to the Wildland Fire Hazard Area map in the Sonoma County General Plan, the project site is located within a State Responsibility Area within a Moderate Fire Hazard Severity Zone and not within the wildland urban interface.

The site is located within Sonoma County Groundwater Availability Class 2 (Major natural recharge) groundwater zone, and not within a priority groundwater basin.

The parcel is located within the Estero American Sub-watershed, and there are no Class I or II streams on site, however there are several Class III drainages that originate on site[1]. The nearest creek is an unnamed tributary to the Americano Creek that boarders Bloomfield Road. The unnamed tributary is roughly 100-feet from the parcel boundary on the opposite side of Bloomfield Road from the project site. A 50-foot County designated Riparian Corridor setback associated with the off-site drainage extends onto the project parcel in a few locations along Bloomfield Road, but the parcel does not contain any riparian habitat.

[1] Hurvitz Environmental Services, Inc., " Hydrogeologic Assessment Report, 4707 Bloomfield Rd, Petaluma, CA", dated January 26, 2022.


Burnside Rd
Pharoahs Ln
Lovmark Way
Ridge View Ln
Project Parcel
Bloomfield Rd
N
0
375
750
1,500
Feet
1 inch equals 1,500 feet

V. ISSUES RAISED BY THE PUBLIC OR AGENCIES

Agency Referral

On February 2, 2021, a referral packet was circulated to inform and solicit comments from selected relevant local and state agencies and to special districts and special interest groups that were anticipated to take interest in the project. The project planner has received responses to the project referral from:

- Sonoma County Fire Prevention
- Sonoma County Public Infrastructure (formerly Transportation and Public Works)
- Sonoma County Environmental Health
- Permit Sonoma Engineering - Grading and Stormwater Section
- Permit Sonoma Natural Resources Professional Geologist
- The State Water Resources Control Board
- Northwest Information Center

The referral responses included several requests for further information and included recommended draft use permit conditions of approval.

Tribal Consultation Under AB52

Referrals were sent to the following Tribes on February 2, 2021:

- Cloverdale Rancheria of Pomo Indians
- Dry Creek Rancheria Band of Pomo Indians
- Lytton Rancheria of California
- Kashia Pomos Stewarts Point Rancheria
- Federated Indians of Graton Rancheria
- Middletown Rancheria Band of Pomo Indians
- Mishewal Wappo Tribe of Alexander Valley
- Torres Martinez Desert Cahuilla Indians

The AB52 referral period ended on March 2, 2021. No Tribe requested further information and no Tribe requested formal consultation.

Public Comments

A neighborhood notification was distributed to residents within 1,000 feet of the subject property line on January 16, 2020. No public comments have been received.

VI. OTHER RELATED PROJECTS

There are two proposed cannabis operations (UPC23-0001 and UPC23-0002) that are within a two-mile radius of the project site, neither are currently approved nor operating. Both of these projects are located approximately 1.5-miles southwest of this project, and both projects have proposed 10,000 square feet of mixed light cultivation and 33,560 square feet of outdoor cultivation.

There was previously a 10,000 square foot outdoor cannabis operation east of the project site permitted by the Sonoma County Department of Agriculture Weights and Measurements that expired in June 2022. No cannabis is being grown at that site now, though it is currently registered to cultivate hemp. An application for a one-acre outdoor cannabis operation, UPC17-0079, approximately 1.25 miles to the south of UPC19-0012 was withdrawn in August 2023.

VII. EVALUATION OF ENVIRONMENTAL IMPACTS

This section analyzes the potential environmental impacts of this project based on the criteria set forth in the State CEQA Guidelines and the County's implementing ordinances and guidelines. For each item, one of four responses is given:

> **No Impact: The project would not have the impact described.** The project may have a beneficial effect, but there is no potential for the project to create or incrementally add to the impact described.
>
> **Less Than Significant Impact**: The project would have the impact described, but the impact would not be significant. Mitigation is not required, although the project applicant may choose to modify the project to avoid the impacts.
>
> **Less Than Significant with Mitigation Incorporated:** The project would have the impact described, and the impact could be significant. One or more mitigation measures have been identified that will reduce the impact to a less than significant level.
>
> **Potentially Significant Impact:** The project would have the impact described, and the impact could be significant. The impact cannot be reduced to less than significant by incorporating mitigation measures. An environmental impact report must be prepared for this project.

Each question was answered by evaluating the project as proposed, that is, without considering the effect of any added mitigation measures. The Initial Study includes a discussion of the potential impacts and identifies mitigation measures to substantially reduce those impacts to a level of insignificance where feasible. All references and sources used in this Initial Study are listed in the Reference section at the end of this report and are incorporated herein by reference.

1. AESTHETICS:

Except as provided in Public Resources Code Section 21099, would the project:

a) Have a substantial adverse effect on a scenic vista?

Comment:
The project is not in an area designated as visually sensitive by the Sonoma County General Plan (i.e., Scenic Landscape Unit, Scenic Corridor, Community Separator) or the Petaluma Dairy Belt Area Plan. The nearest designated visually sensitive area is approximately one-half mile east of the project site on Burnside Road and does not afford views of the project site. The project will include the construction of three new structures consisting of one greenhouse, one indoor cultivation structure, and one indoor propagation and processing structure. The project site will be visible from Bloomfield Road which is not designated as a Scenic Corridor. It is not located on a scenic hillside, nor would it involve tree removal, grading or construction that would affect a scenic vista.

Significance Level: No Impact

b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?

Comment:
The project is not located on or visible from a state scenic highway. The two officially designated state scenic highways in Sonoma County are Highway 12 and Highway 116. The project would not result in any impacts to scenic resources associated with a state scenic highway.

Significance Level: No Impact

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public Views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

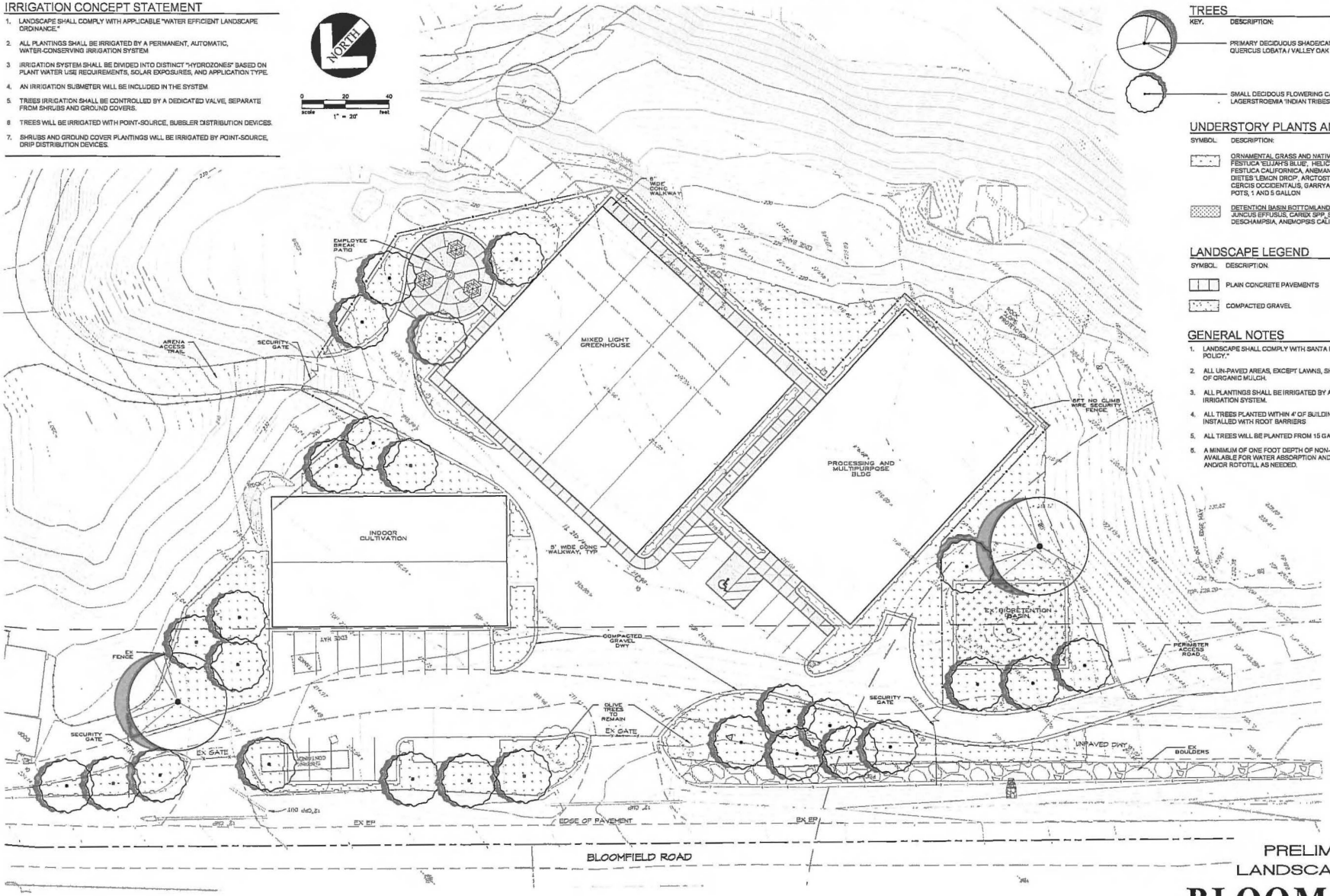
Comment:
The existing visual character of the site and surrounding area is rural agricultural, primarily open grassland and grazing land, and rural residential uses. Project structures would be visible from Bloomfield Road, but blend with the agrarian character of the site. Fencing is existing along the property boarding Bloomfield Road. Additional fencing will be constructed surrounding the cannabis premises, and landscaping planted at the front of the parcel boarding Bloomfield Road (See Figure 6 Landscaping Plan). Landscaping would be installed in front of the fence and would consist of drought-tolerant, fire-resistant, trees and shrubs. Although the fencing will be visible, the proposed landscaping would substantially soften the visual appearance. The greenhouse would be setback between the two indoor structures, which will screen most of the greenhouse. Design review of all commercial structures, including fencing, and landscaping will be required as a standard use permit condition of approval to ensure the approved fencing and landscaping is compatible with County requirements and with the surrounding area.

IRRIGATION CONCEPT STATEMENT

1. LANDSCAPE SHALL COMPLY WITH APPLICABLE "WATER EFFICIENT LANDSCAPE ORDINANCE."
2. ALL PLANTINGS SHALL BE IRRIGATED BY A PERMANENT, AUTOMATIC, WATER-CONSERVING IRRIGATION SYSTEM.
3. IRRIGATION SYSTEM SHALL BE DIVIDED INTO DISTINCT "HYDROZONES" BASED ON PLANT WATER USE REQUIREMENTS, SOLAR EXPOSURES, AND APPLICATION TYPE.
4. AN IRRIGATION SUBMETER WILL BE INCLUDED IN THE SYSTEM.
5. TREES IRRIGATION SHALL BE CONTROLLED BY A DEDICATED VALVE, SEPARATE FROM SHRUBS AND GROUND COVERS.
6. TREES WILL BE IRRIGATED WITH POINT-SOURCE, BUBBLER DISTRIBUTION DEVICES.
7. SHRUBS AND GROUND COVER PLANTINGS WILL BE IRRIGATED BY POINT-SOURCE, DRIP DISTRIBUTION DEVICES.

NORTH

0 20 40
scale 1" = 20' feet



TREES

KEY.	DESCRIPTION:	SIZE:	WATER USE
	PRIMARY DECIDUOUS SHADE/CANOPY TREES QUERCUS LOBATA / VALLEY OAK TO MATCH EXISTING	15 GAL	LOW
	SMALL DECIDOUS FLOWERING CANOPY TREES LAGERSTROEMIA 'INDIAN TRIBES' / CRAPE MYRTLES	15 GAL.	LOW

UNDERSTORY PLANTS AND GROUNDCOVERS

SYMBOL	DESCRIPTION:
	ORNAMENTAL GRASS AND NATIVE FLOWERING SHRUBS (LOW WATER USE) FESTUCA 'ELIJAH'S BLUE', HELICTOTRICHON 'SAPHIRE', FESTUCA MAIREI, FESTUCA CALIFORNICA, ANEMANTHELE LESSONIANA DIANELLA CULTIVARS, DIETES 'LEMON DROP' ARCTOSTAPHYLOS 'MONNY', CEANOTHUS 'CONCHA', CERCIS OCCIDENTALIS, GARRYA ELIPTICA, RIBES, EPILOBIUM, MIMULUS - 4" POTS, 1 AND 5 GALLON
	DETENTION BASIN BOTTOMLAND PLANTINGS (MEDIUM WATER USE) JUNCUS EFFUSUS, CAREX SPP, SISYRINCHIUM SPP., FESTUCA RUBRA, DESCHAMPSIA, ANEMOPSIS CALIFORNICA, OENETHERA ELATA - HYDROSEED

LANDSCAPE LEGEND

SYMBOL	DESCRIPTION:
	PLAIN CONCRETE PAVEMENTS
	COMPACTED GRAVEL

GENERAL NOTES

1. LANDSCAPE SHALL COMPLY WITH SANTA ROSA'S "WATER EFFICIENT LANDSCAPE POLICY."
2. ALL UN-PAVED AREAS, EXCEPT LAWNS, SHALL BE TOP-DRESSED WITH A 2"-3" LAYER OF ORGANIC MULCH.
3. ALL PLANTINGS SHALL BE IRRIGATED BY AN AUTOMATIC, WATER CONSERVING IRRIGATION SYSTEM.
4. ALL TREES PLANTED WITHIN 4' OF BUILDINGS, WALL, CURBS OR PAVEMENTS WILL BE INSTALLED WITH ROOT BARRIERS
5. ALL TREES WILL BE PLANTED FROM 15 GALLON CONTAINERS, EXCEPT WHERE NOTED
6. A MINIMUM OF ONE FOOT DEPTH OF NON-MECHANICALLY COMPACTED SOIL SHALL BE AVAILABLE FOR WATER ABSORPTION AND ROOT GROWTH IN PLANTED AREAS RIP AND/OR ROTOTILL AS NEEDED.

PRELIMINARY
LANDSCAPE PLAN

BLOOMFIELD FLOWERS

PETALUMA, CALIFORNIA

DECEMBER 20, 2019 SHEET 1 OF 1

CARLILE • MACY

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15 THIRD STREET, SANTA ROSA, CA 95401
TEL (707) 542-5451 FAX (707) 542-5212

PROJECT No. 2000208.00

Following the County's Visual Assessment Guidelines, the site sensitivity of the project site would be considered "Moderate" because:

> *The site or portion thereof is within a rural land use designation, but the site has no land use or zoning designations protecting scenic resources. The project vicinity is characterized by rural development that may include historic resources or be considered a gateway to the Bloomfield community. This category includes building or construction sites with visible slopes less than 30 percent or where there is significant natural features of aesthetic value that is visible from public roads or public use areas (i.e. parks, trails etc.).*[2]

The visual dominance would be Co-Dominant, applied when proposed project elements would be moderate or prominent within the setting, but still compatible with their surroundings. The proposed buildings, and other site development would be visible from Bloomfield Road, but the fence and landscaping would soften the view.

Table 3. Thresholds of Significance for Visual Impact Analysis
PRMD Visual Assessment Guidelines

Sensitivity	**Visual Dominance**			
	Dominant	***Co-Dominant***	***Subordinate***	***Inevident***
Maximum	Significant	Significant	Significant	Less than significant
High	Significant	Significant	Less than significant	Less than significant
Moderate	Significant	Less than significant	Less than significant	Less than significant
Low	Less than significant	Less than significant	Less than significant	Less than significant

Based on the project site's Moderate visual sensitivity and the proposed project's Co-Dominant visual dominance, the project would be considered to have a less than significant effect on the existing visual character or quality of the site and its surroundings.

Significance Level: Less than Significant Impact

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Comment:
The proposed mixed light greenhouse buildings would use frosted composite material as roofing and walls, which will limit potential for daytime glare associated with sunlight striking the roof. Proposed security lighting at all locations would be fully shielded, downward casting, and motion sensor controlled. Because of this nighttime lighting spillage from security lighting is anticipated to be minimal. However, as a condition of approval, the project would be required to comply with the following Zoning Code lighting requirement:

[2] Sonoma County. "Visual Assessment Guidelines and Procedure," January 2019 Visual Assessment Guidelines (permitsonoma.org)

All lighting shall be fully shielded, downward casting and not spill over onto structures, other properties or the night sky. All indoor and mixed light operations shall be fully contained so that little to no light escapes. Light shall not escape at a level that is visible from neighboring properties between sunset and sunrise (Sec 26-88-254(f)(19)).

The condition supports and is consistent with California Bureau of Cannabis Control requirements for project lighting (16 CCR 5502).

Design review is required as a standard use permit condition of approval and includes review of all proposed exterior lighting to ensure it is compatible with County requirements and with the surrounding area.

Significance Level: Less than Significant Impact

2. AGRICULTURE AND FOREST RESOURCES:

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

Comment:
According to the California Department of Conservation's Sonoma County Important Farmland Map, the parcel is designated Farmland of Local Importance, Grazing Land, and other land.[3] Therefore, the project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use.

Significance Level: No Impact

b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?

Comment:
The parcel is zoned Land Extensive Agriculture (LEA). This land use designation is intended to enhance and protect lands best suited for permanent agricultural use and capable of relatively low production per acre of land. Agricultural Resource policies focus on establishing and maintaining

[3] California Department of Conservation. California Important Farmland Finder. DLRP Important Farmland Finder (ca.gov) Accessed January 12, 2023.

parcel sizes that are conducive to continued agricultural production and restricting non-agricultural uses to those that are compatible with agriculture. The Zoning Designation for the project site is also Land Extensive Agriculture, which allows commercial cannabis cultivation (up to 1 acre of cultivation area), including ancillary processing operations, with a use permit (Sec. 26-06-030).

The parcel is not subject to a Williamson Act Land Conservation Contract. Agricultural uses on the parcel include a horse training facility, commercial organic vegetable farm, bee keeping, and sheep grazing, which will continue to operate independent of the cannabis operation. Additionally, the project complies with County Code Section 26-88- 250, Table A1, footnote 2, which limits structural development for cannabis cultivation to previously developed areas. The entire project footprint is within an existing previously developed area of the parcel formerly used as a rock quarry, decommissioned prior to 1980, then utilized as an equipment staging and parking area since at least 2001. The project site has been graded and contains compacted gravel. Therefore, the project would not conflict with the existing zoning for agricultural use, or a Williamson Act Contract.

Significance Level: No Impact

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

Comment:
The project site is not in a Timberland Production zoning district, and no commercial timberland is present. Therefore, the project would not conflict with or cause rezoning of forest land or timberland zoned Timberland Production.

Significance Level: No Impact

d) Result in the loss of forest land or conversion of forest land to non-forest use?

Comment:
The project would not be located on land utilized or zoned for forest land, timberland, or timber production. Therefore, the project would not result in the loss or conversion of forest land.

Significance Level: No Impact

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland, to non-agricultural use or conversion of forest land to non-forest use?

Comment:
The project does not involve conversion of land currently used for agricultural purposes. Horse training, operation of a commercial vegetable garden, bee keeping, and sheep grazing would continue independently from the proposed cannabis cultivation project. The project would not remove any land currently or recently being used for agriculture from that use.

The proposed cultivation operation would be located on a flat graded and graveled area of the parcel previously used as a quarry prior to 1980. Therefore, the project would not convert a

significant amount of potential farmland to non-agricultural use.

Significance Level: Less than Significant Impact

3. AIR QUALITY:

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?

Comment:
The project is located within the jurisdiction of the Bay Area Air Quality Management District (BAAQMD) and within the San Francisco Bay Area Air Basin. According to California standards, the San Francisco Bay Area Air Basin is currently designated as a nonattainment area for particulate matter 2.5 microns or less in diameter ($PM_{2.5}$), particulate matter 10 microns or less in diameter (PM_{10}), and ozone. Under national standards, the San Francisco Bay Area Air Basin is currently designated as nonattainment for $PM_{2.5}$ and 8-hour ozone. The Air Basin is in attainment (or unclassified) for all other air pollutants (BAAQMD 2020).

The BAAQMD's 2017 Clean Air Plan (BAAQMD 2017a) is the applicable air quality plan for the San Francisco Bay Area Air Basin. The 2017 Clean Air Plan contains 85 individual control measures in nine economic sectors: stationary (industrial) sources, transportation, energy, buildings, agriculture, natural and working lands, waste management, water, and super-GHG pollutants. Many of these control measures require action on the part of the BAAQMD, the California Air Resources Board (CARB), or local communities, and are not directly related to the actions undertaken for an individual development project. The project would not prevent the BAAQMD from implementing these actions and none apply directly to the project. The project size would be well below emission threshold screening levels for ozone precursors (see discussion in 3.b below). As a result, the project would not conflict with or obstruct implementation of the 2017 Clean Air Plan.

Significance Level: No Impact

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard?

Comment:
As summarized in Item 3.a above, the San Francisco Bay Area Air Basin is currently designated as a nonattainment area for $PM_{2.5}$, PM_{10}, and ozone under State standards. Under national standards, the San Francisco Bay Area Air Basin is currently designated as nonattainment for $PM_{2.5}$ and 8-hour ozone. The Air Basin is in attainment (or unclassified) for all other air pollutants (BAAQMD 2020). Based on the current Air Basin designations, the non-attainment pollutants of concern are ozone, PM_{10}, and $PM_{2.5}$.

Short-Term Construction Emissions: The BAAQMD's 2017 CEQA Air Quality Guidelines provides screening criteria for determining if a project could result in significant construction-phase impacts

from criteria pollutants and precursors.[4] Criteria air pollutants and precursors include reactive organic gases, nitrogen oxides, PM10, PM2.5, and carbon monoxide.

Cannabis cultivation is not listed as a land use type in the BAAQMD screening criteria; however, a general comparison can be made to a similar land use. The applicable construction-related screening size for a general light industrial land use is 259,000 square feet of facilities and/or a project construction site that is 11 acres or greater in size. The project would include approximately 29,440-square feet of facilities on an approximately 2.5- acre portion of a 113-acre parcel. The project size would be considerably less than the BAAQMD's construction related criteria pollutant and precursor screening level. Following use of the screening criteria found in the BAAQMD Air Quality Guidelines, a detailed air quality study for construction related air emissions is not required for the project. The project would not be anticipated to encounter asbestos-containing materials during construction. Construction would not involve the simultaneous occurrence of more than two construction phases, or construction of more than one land-use type. Construction would not involve extensive site preparation or material transport as balanced cut and fill would be used with a small amount of engineered fill for spread footings and slab-on-grade support. The project would not have a cumulative effect on ozone because it would not exceed the BAAQMD's thresholds of significance for ozone precursors during construction. The project would result in a short-term increase in fugitive dust emissions during construction (which would include PM2.5 and PM10). With implementation of the BAAQMD's recommended basic construction measures identified in Mitigation Measure AIR-1, the impact of construction emissions would be less than significant.

Operation:
The applicable BAAQMD operational screening size for a light industrial facility is 541,000 square feet of facility, or a site that is 72 acres in size, or a project that includes 1,249 employees. The project would include approximately 29,440-square feet of facilities on an approximately 2.5-acre portion of a 113-acre parcel and would include up to 19 employees. The project would be less than the BAAQMD's operational criteria pollutant and precursor screening level and would not result in substantial long-term operational emissions of criteria air pollutants. Therefore, the project's contribution to a cumulative nonattainment criteria pollutant impact would be less than significant. The BAAQMD screening analysis for a carbon monoxide hotspot is whether a project would increase traffic volumes at a nearby intersection to more than 44,000 vehicles per hour. The project would generate an average of 23 trips on a daily basis. This amount of vehicle trips would not generate significant emissions, and therefore, would not significantly contribute to formation of a carbon monoxide hotspot in the project area. The project would have no long-term effect on PM2.5 and PM10, as ground surfaces would be paved, landscaped or otherwise treated to stabilize bare soils after construction, and dust generation would be minimal. The project would generate ozone precursors from new vehicle trips, but would not have a cumulative effect on ozone as the project would not exceed the BAAQMD's thresholds of significance for ozone precursor

Significance Level: Less than Significant with Mitigation Incorporated

Mitigation:
Mitigation Measure AIR-1 Construction Dust and Air Quality Control:
The following dust and air quality control measures shall be included in the project:

[4] Bay Area Air Quality Management District (BAAQMD). 2017. California Environmental Quality Act Air Quality Guidelines. BAAQMD CEQA Guidelines - May 2017, Accessed January 12, 2023.

a. Construction Coordinator shall be designated by the project applicant, and a sign shall be posted on the site including the Coordinator's 24-hour phone number for public contact regarding dust, trackout, and air quality complaints. The Coordinator shall respond and take corrective action within 48 hours. The Coordinator shall report all complaints and their resolutions to Permit Sonoma staff.

b. Water or alternative dust control method shall be sprayed to control dust on construction areas, soil stockpiles, and staging areas during construction as directed by the County.

c. Trucks hauling soil, sand, and other loose materials over public roads shall cover the loads, or shall keep the loads at least two feet below the level of the sides of the container, or shall wet the load sufficiently to prevent dust emissions.

d. Vehicle speeds on unpaved areas shall be limited to 15 miles per hour.

e. Final surfacing (i.e., pavement or concrete, gravel, landscaping) shall be completed as soon as possible after earthwork is finished, unless seeding or soil binders are used.

f. Idling time of diesel-powered construction equipment shall be limited to five minutes. Signs shall be posted reminding workers of this idling restriction at all access points and equipment staging areas during construction of the proposed project.

g. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications and shall have a CARBcertified visible emissions evaluator check equipment prior to use at the site.

h. Trackout shall not be allowed at any active exit from the project site onto an adjacent paved public roadway or shoulder of a paved public roadway that exceeds cumulative 25 linear feet and creates fugitive dust visible emissions without cleaning up such trackout within 4 hours of when the Construction Coordinator identifies such excessive trackout, and shall not allow more than 1 quart of trackout to remain on the adjacent paved public roadway or the paved shoulder of the paved public roadway at the end of any workday.

i. Visible emissions of fugitive dust shall not be allowed during cleanup of any trackout that exceeds 20 percent opacity as determined by the Environmental Protection Agency in Method 203B - Opacity Determination for Time Exception Regulations (August 2017).

Trackout is defined by BAAQMD in Regulation 6, Rule 6: Prohibition of Trackout (August 2018) as any sand, soil, dirt, bulk materials or other solid particles from a site that adhere to or agglomerate on the exterior surfaces of vehicles (including tires), and subsequently fall or are dislodged onto a paved public roadway or the paved shoulder of a paved public roadway on the path that vehicles follow at any exit and extending 50 feet out onto the paved public roadway beyond the boundary of the site. Material that has collected on the roadway from erosion is not trackout.

Mitigation Monitoring:

Mitigation Monitoring AIR-1 Construction Dust and Air Quality Control:

Permit Sonoma staff shall verify that the AIR-1 measures are included on all site alteration, grading,

building or improvement plans prior to issuance of grading or building permits. The applicant shall submit documentation to Permit Sonoma staff that a Construction Coordinator has been designated and that appropriate signage has been posted including the coordinator's phone number. Documentation may include photographic evidence or a site inspection, at the discretion of Permit Sonoma staff.

c) Expose sensitive receptors to substantial pollutant concentrations?

Comment:
Sensitive receptors include hospitals, schools, convalescent facilities, and residential areas. The project site is located in a predominantly rural area, away from institutional receptors (the nearest known school is Twin Hills Middle School over 3 miles to the northeast). The proposed cultivation areas meet the required 300-foot setback to offsite residences required by County Code.

Based on the analysis in Section 3.a and 3.b, the project would not result in substantial pollutant exposure due to operations. However, as described in section 3.b, there could be significant short-term increase in construction vehicle emissions or emission dust (which would include PM2.5 and PM10) during the construction. Project construction activities and associated DPM emissions would occur intermittently during the daytime weekday period (i.e., they would not be a continuous source of emissions). The intermittent nature of project construction activities would provide time for emitted pollutants to disperse on an hourly and daily basis according to the local wind patterns. Construction activities would be short in duration, occurring over 7-8 months. This means nearby receptors would be exposed to construction emissions for a duration that is substantially less than the 70-year lifetime exposure duration used by the Office of Environmental Health Hazard Assessment to estimate adverse health risks from air pollutants.[5] Any construction period effects on air quality (i.e., dust, diesel exhaust), would be reduced to a less than significant level with implementation of Mitigation Measure AIR-1.

The project would include emergency backup power via a permanently installed diesel-powered generator. A backup emergency generator would only be used when power is lost and when the generator is exercised for maintenance purposes. The operational impact on sensitive receptors to substantial pollutant concentrations would be less than significant.

Significance Level: Less than Significant with Mitigation Incorporated

Mitigation:
Mitigation Measure AIR-1 Mitigation

Monitoring:
Mitigation Monitoring AIR-1

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Comment:

[5] OEHHA, 2015. Air Toxics Hot Spots Risk Assessment Guidelines: The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments. Accessed January 12,2023.

Construction Odors: Construction equipment may generate odors during project construction; however, construction activities would be short-term, intermittent, and would cease upon completion of project construction. In addition, implementation of Mitigation Measure AIR-1 would reduce construction vehicle emissions which could contribute to odor and would not affect a substantial number of people. Therefore, the construction-related odor impact would be less than significant with mitigation described in mitigation measure AIR-1.

Cannabis Odors: Much of the odor associated with cannabis cultivation, as well as commercial cannabis products, comes from a class of aromatic, organic compounds known as terpenes. Terpenes are not specific to cannabis; they are among the most common compounds produced by flowering plants, vary widely between plants, and are responsible for the fragrance of many flowers typically associated with non-objectionable odors, such as lavender. Different strains of cannabis emit a wide variety of odors with differing levels of potency. The odor may be detectable beyond the cultivation site property boundaries depending on the size of the facility and the specific climatic and topographic conditions that prevail near the cultivation site. In general, cannabis odors tend to lessen during cooler temperatures and worsen with higher temperatures, and wind patterns have the potential to increase or decrease the intensity of cannabis odors depending on whether winds are blowing towards or away from nearby receptors. As noted in the County's 2016 IS/ND, outdoor cultivation has the greatest potential to expose receptors to odors particularly during the final phase of the growing cycle (i.e., typically late summer or early fall). Indoor and mixed light cultivation can have year-round growing cycles, but generally do not affect surrounding receptors due to required odor-control and ventilation systems.

The distinctive odor generated by cannabis cultivation, processing, and manufacturing may or may not be perceived as objectionable, offensive, or a nuisance, depending on the particular individual's olfactory sensitivity. The BAAQMD CEQA Air Quality Guidelines (BAAQMD 2017, page 7-1), state that odors are generally regarded as an annoyance rather than as a health hazard. Individual reactions to odors can range from psychological (e.g., irritation, anger, anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, headache), and the ability to detect odors varies considerably from person to person and is considered to be subjective. An odor that is offensive to one person may not be offensive to another person. Unfamiliar odors are more easily detected and are more likely to cause complaints than familiar odors, as a person can become desensitized to almost any odor over time (this is known as odor fatigue). In general, the quality and intensity of an odor would influence a person's reaction. The quality of an odor indicates the nature of the smell experience (flowery, putrid, etc.). The intensity of an odor depends on its concentration in the air. When an odor sample is progressively diluted, the odor concentration decreases. As this occurs, the odor intensity weakens and eventually becomes low enough that the odor is no longer detectable. The BAAQMD CEQA Air Quality Guidelines contain odor screening distances for a variety of land uses typically associated with odors such as wastewater treatment plants, landfill and composting facilities, and chemical manufacturing facilities. The recommended screening distance for most of these facilities is one mile. New odor sources located further than one mile from sensitive receptors would not likely result in a significant odor impact; however, cannabis facilities are not listed as a type of land use in the BAAQMD odor screening criteria, and the BAAQMD CEQA Air Quality Guidelines state these screening distances should not be considered "as absolute screening criteria, rather as information to consider along with odor parameters" (BAAQMD, 2017, page 3-4).

Greenhouse and Indoor Cultivation and Processing Odors: Cannabis cultivation facilities are not listed as an odor-generating use in the BAAQMD California Environmental Quality Act Air Quality

Guidelines (May 2017). However, the County's cannabis ordinance requires compliance with the following Zoning Code Operating Standard:

> *All indoor and mixed light cultivation operations and any drying, aging, trimming and packing facilities shall be equipped with odor control filtration and ventilation system(s) to control odors, humidity, and mold (Sec. 26-88-254(g)(2).*

The project proposes on site processing of cannabis as well as indoor and mixed light cultivation. Both indoor and mixed light facilities will be equipped with odor control filtration and ventilation systems. The project includes self-contained closed-loop climate control systems, including carbon filtration to clean the air and control odor, for all cultivation and processing structures in order to contain odors. Therefore, regular project operation would result in less than significant odor impacts.

Significance Level: Less than Significant Impact

4. BIOLOGICAL RESOURCES:

Regulatory Framework

The following discussion identifies federal, state and local environmental regulations that serve to protect sensitive biological resources relevant to the California Environmental Quality Act (CEQA) review process.

Federal

Federal Endangered Species Act (FESA)

FESA establishes a broad public and federal interest in identifying, protecting, and providing for the recovery of threatened or endangered species. The Secretary of Interior and the Secretary of Commerce are designated in FESA as responsible for identifying endangered and threatened species and their critical habitat, carrying out programs for the conservation of these species, and rendering opinions regarding the impact of proposed federal actions on listed species. The USFWS and the National Oceanic and Atmospheric Administration's National Marine Fisheries Service (NOAA Fisheries) are charged with implementing and enforcing the FESA. USFWS has authority over terrestrial and continental aquatic species, and NOAA Fisheries has authority over species that spend all or part of their life cycle at sea, such as salmonids.

Section 9 of FESA prohibits the unlawful "take" of any listed fish or wildlife species. Take, as defined by FESA, means "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such action." USFWS's regulations define harm to mean "an act which actually kills or injures fish or wildlife." Such an act "may include "significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding or sheltering" (50 CFR § 17.3). Take can be permitted under FESA pursuant to sections 7 and 10. Section 7 provides a process for take permits for federal projects or projects subject to a federal permit, and Section 10 provides a process for incidental take permits for projects without a federal nexus. FESA does not extend the take prohibition to federally listed plants on private land, other than prohibiting the removal, damage, or destruction of such species in violation of state law.

Critical Habitat

Critical habitat is a term defined in the FESA as a specific geographic area that contains features essential for the conservation of a threatened or endangered species and that may require special management and protection. The FESA requires federal agencies to consult with USFWS to conserve listed species on their lands and to ensure that any activities or projects they fund, authorize, or carry out will not jeopardize the survival of a threatened or endangered species. In consultation for those species with critical habitat, federal agencies must also ensure that their activities or projects do not adversely modify critical habitat to the point that it will no longer aid in the species' recovery, whether or not those lands are occupied by the subject species. In many cases, this level of protection is similar to that already provided to species by the FESA jeopardy standard (which is applied to ensure that a federal action would not jeopardize the continued existence of a listed species or result in the destruction or adverse modification of critical habitat).

Essential Fish Habitat

Essential Fish Habitat (EFH) is regulated by NOAA Fisheries. Protection of Essential Fish Habitat is mandated through changes implemented in 1996 to the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) to protect the loss of habitat necessary to maintain sustainable fisheries in the United States. The Magnuson-Stevens Act defines EFH as "those waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity" [16 USC 1802(10)]. NOAA Fisheries further defines EFH as areas that "contain habitat essential to the long-term survival and health of our nation's fisheries" EFH can include the water column, certain bottom types such as sandy or rocky bottoms, vegetation such as eelgrass or kelp, or structurally complex coral or oyster reefs. Under regulatory guidelines issued by NOAA Fisheries, any federal agency that authorizes, funds, or undertakes action that may affect EFH is required to consult with NOAA Fisheries (50 CFR 600.920).

The Migratory Bird Treaty Act of 1918 (MBTA)

The U.S. MBTA (16 USC §§ 703 et seq., Title 50 Code of Federal Regulations [CFR] Part 10) states it is "unlawful at any time, by any means or in any manner, to pursue, hunt, take, capture, kill; attempt to take, capture or kill; possess, offer for sale, sell, offer to barter, barter, offer to purchase, purchase, deliver for shipment, ship, export, import, cause to be shipped, exported, or imported, deliver for transportation, transport or cause to be transported, carry or cause to be carried, or receive for shipment, transportation, carriage, or export any migratory bird, any part, nest, or egg of any such bird, or any product, whether or not manufactured, which consists, or is composed in whole or in part, of any such bird or any part, nest or egg thereof…" In short, under MBTA it is illegal to disturb a nest that is in active use, since this could result in killing a bird, destroying a nest, or destroying an egg. The USFWS enforces MBTA. The MBTA does not protect some birds that are non-native or human-introduced or that belong to families that are not covered by any of the conventions implemented by MBTA. In 2017, the USFWS issued a memorandum stating that the MBTA does not prohibit incidental take; therefore, the MBTA is currently limited to purposeful actions, such as directly and knowingly removing a nest to construct a project, hunting, and poaching.

The Clean Water Act (CWA)

The CWA is the primary federal law regulating water quality. The implementation of the CWA is the

responsibility of the U.S. Environmental Protection Agency (EPA). However, the EPA depends on other agencies, such as the individual states and the U.S. Army Corps of Engineers (USACE), to assist in implementing the CWA. The objective of the CWA is to "restore and maintain the chemical, physical, and biological integrity of the Nation's waters." Section 404 and 401 of the CWA apply to activities that would impact waters of the U.S. The USACE enforces Section 404 of the CWA and the California State Water Resources Control Board enforces Section 401.

Section 404

As part of its mandate under Section 404 of the CWA, the EPA regulates the discharge of dredged or fill material into "waters of the U.S.". "Waters of the U.S. include territorial seas, tidal waters, and non-tidal waters in addition to wetlands and drainages that support wetland vegetation, exhibit ponding or scouring, show obvious signs of channeling, or have discernible banks and high-water marks. Wetlands are defined as those areas "that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support a prevalence of vegetation typically adapted for life in saturated soil conditions" (33 CFR 328.3(b)). The discharge of dredged or fill material into waters of the U.S. is prohibited under the CWA except when it is in compliance with Section 404 of the CWA. Enforcement authority for Section 404 was given to the USACE, which it accomplishes under its regulatory branch. The EPA has veto authority over the USACE's administration of the Section 404 program and may override a USACE decision with respect to permitting. Substantial impacts to waters of the U.S. may require an Individual Permit. Projects that only minimally affect waters of the U.S. may meet the conditions of one of the Nationwide Permits, provided that such permit's other respective conditions are satisfied. A Water Quality Certification or waiver pursuant to Section 401 of the CWA is required for Section 404 permit actions (see below).

Section 401

Any applicant for a federal permit to impact waters of the U.S. under Section 404 of the CWA, including Nationwide Permits where pre-construction notification is required, must also provide to the USACE a certification or waiver from the State of California. The "401 Certification" is provided by the State Water Resources Control Board through the local Regional Water Quality Control Board (RWQCB). The RWQCB issues and enforces permits for discharge of treated water, landfills, storm-water runoff, filling of any surface waters or wetlands, dredging, agricultural activities and wastewater recycling. The RWQCB recommends the "401 Certification" application be made at the same time that any applications are provided to other agencies, such as the USACE, USFWS, or NOAA Fisheries. The application is not final until completion of environmental review under CEQA. The application to the RWQCB is similar to the pre-construction notification that is required by the USACE. It must include a description of the habitat that is being impacted, a description of how the impact is proposed to be minimized and proposed mitigation measures with goals, schedules, and performance standards.

State

California Endangered Species Act (CESA)

Provisions of CESA protect state-listed threatened and endangered species. The CDFW is charged with establishing a list of endangered and threatened species. CDFW regulates activities that may result in "take" of individuals (i.e., "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill"). Habitat degradation or modification is not expressly included in the definition of "take"

under the California Fish and Game Code (CFGC), but CDFW has interpreted "take" to include the killing of a member of a species which is the proximate result of habitat modification.

Fish and Game Code 1600-1602

Sections 1600-1607 of the CFGC require that a Notification of Lake or Streambed Alteration Agreement (LSAA) application be submitted to CDFW for "any activity that may substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake." CDFW reviews the proposed actions in the application and, if necessary, prepares a LSAA that includes measures to protect affected fish and wildlife resources, including mitigation for impacts to bats and bat habitat.

Nesting Birds

Nesting birds, including raptors, are protected under CFGC Section 3503, which reads, "It is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto." In addition, under CFGC Section 3503.5, "it is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto". Passerines and non-passerine land birds are further protected under CFGC 3513. As such, CDFW typically recommends surveys for nesting birds that could potentially be directly (e.g., actual removal of trees/vegetation) or indirectly (e.g., noise disturbance) impacted by project-related activities. Disturbance during the breeding season could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment. Disturbance that causes nest abandonment and/or loss of reproductive effort is considered "take" by CDFW.

Non-Game Mammals

Sections 4150-4155 of the CFGC protects non-game mammals, including bats. Section 4150 states "A mammal occurring naturally in California that is not a game mammal, fully protected mammal, or fur-bearing mammal is a nongame mammal. A non-game mammal may not be taken or possessed except as provided in this code or in accordance with regulations adopted by the commission." The non-game mammals that may be taken or possessed are primarily those that cause crop or property damage. Bats are classified as a non-game mammal and are protected under the CFGC.

California Fully Protected Species and Species of Special Concern

The classification of "fully protected" was the CDFW's initial effort to identify and provide additional protection to those animals that were rare or faced possible extinction. Lists were created for fish, amphibians and reptiles, birds, and mammals. Most of the species on these lists have subsequently been listed under CESA and/or FESA. The Fish and Game Code sections (fish at §5515, amphibians and reptiles at §5050, birds at §3503 and §3511, and mammals at §4150 and §4700) dealing with "fully protected" species state that these species "…may not be taken or possessed at any time and no provision of this code or any other law shall be construed to authorize the issuance of permits or licenses to take any fully protected species," although take may be authorized for necessary scientific research. This language makes the "fully protected" designation the strongest and most restrictive regarding the "take" of these species. In 2003, the code sections dealing with "fully protected" species were amended to allow the CDFW to authorize take resulting from recovery activities for state-listed species.

California Species of Special Concern (CSC) are broadly defined as animals not listed under the FESA or CESA, but which are nonetheless of concern to the CDFW because they are declining at a rate that could result in listing or because they historically occurred in low numbers and known threats to their persistence currently exist. This designation is intended to result in special consideration for these animals by the CDFW, land managers, consulting biologists, and others, and is intended to focus attention on the species to help avert the need for costly listing under FESA and CESA and cumbersome recovery efforts that might ultimately be required. This designation also is intended to stimulate collection of additional information on the biology, distribution, and status of poorly known at-risk species, and focus research and management attention on them. Although these species generally have no special legal status, they are given special consideration under the CEQA during project review. Plant species on California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants with California Rare Plant Ranks (Rank) of 1 and 2 are also considered special-status plant species and must be considered under CEQA. Bat species designated as "High Priority" by the Western Bat Working Group (WBWG) qualify for legal protection under Section 15380(d) of the CEQA Guidelines. Species designated "High Priority" are defined as "imperiled or are at high risk of imperilment based on available information on distribution, status, ecology and known threats."

Porter-Cologne Water Quality Control Act

The intent of the Porter-Cologne Water Quality Control Act (Porter-Cologne) is to protect water quality and the beneficial uses of water, and it applies to both surface and ground water. Under this law, the State Water Resources Control Board develops statewide water quality plans, and the RWQCBs develop basin plans that identify beneficial uses, water quality objectives, and implementation plans. The RWQCBs have the primary responsibility to implement the provisions of both statewide and basin plans. Waters regulated under Porter-Cologne, referred to as "waters of the State," include isolated waters that are not regulated by the USACE. Projects that require a USACE permit, or fall under other federal jurisdiction, and have the potential to impact waters of the State are required to comply with the terms of the Water Quality Certification Program. If a proposed project does not require a federal license or permit, any person discharging, or proposing to discharge, waste (e.g., dirt) to waters of the State must file a Report of Waste Discharge and receive either waste discharge requirements (WDRs) or a waiver to WDRs before beginning the discharge.

Local

Sonoma County General Plan

The Sonoma County General Plan contains policies to protect natural resource lands including, but not limited to, watershed, fish and wildlife habitat, biotic areas, and habitat connectivity corridors.

Riparian Corridor (RC) Combining Zone

The RC combining zone (Zoning Code Sec. 26-65) is established to protect biotic resource communities, including critical habitat areas within and along riparian corridors, for their habitat and environmental value, and to implement the provisions of the General Plan Open Space and Resource Conservation and Water Resources Elements. These provisions are intended to protect and enhance riparian corridors and functions along designated streams, balancing the need for agricultural production, urban development, timber and mining operations and other land uses with the preservation of riparian vegetation,

protection of water resources, floodplain management, wildlife habitat and movement, stream shade, fisheries, water quality, channel stability, groundwater recharge, opportunities for recreation, education and aesthetic appreciation and other riparian functions and values.

Biotic Habitat (BH) Combining Zone

The BH combining zone (Zoning Code Sec. 26-66) is established to protect and enhance Biotic Habitat Areas for their natural habitat and environmental values and to implement the provisions of the General Plan Open Space and Resource Conservation Element, Area Plans and Specific Plans. Protection of these areas helps to maintain the natural vegetation, support native plant and animal species, protect water quality and air quality, and preserve the quality of life, diversity and unique character of the County.

Valley Oak Habitat (VOH) Combining District

The VOH combining district (Zoning Code Sec. 26-67) is established to protect and enhance valley oaks and valley oak woodlands and to implement the provisions of General Plan Resource Conservation Element Section 5.1. Design review approval may be required of projects in the VOH, which would include measures to protect and enhance valley oaks on the project site, such as requiring that valley oaks shall comprise a minimum of fifty percent (50%) of the required landscape trees for the development project.

Sonoma County Tree Protection Ordinance

The Sonoma County Tree Protection Ordinance (Zoning Code Sec. 26-88-010 (m)) establishes policies for protected tree species in Sonoma County. Protected trees are defined (Zoning Code Sec. 26- 02-140) as the following species: big leaf maple (*Acer macrophyllum*), black oak (*Quercus kelloggii*), blue oak (*Quercus douglasii*), coast live oak (*Quercus agrifolia*), interior live oak (*Quercus wislizenii*), madrone (*Arbutus menziesii*), oracle oak (*Quercus morehus*), Oregon oak (*Quercus garryana*), redwood (*Sequoia sempervirens*), valley oak (*Quercus lobata*), California bay (*Umbellularia californica*), and their hybrids.

Project Analysis

Would the project:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Comment:
A Biological Resources Report was prepared for the project site to identify special-status plant and wildlife species and sensitive habitats (including wetlands) that have the potential to occur on or in the vicinity of the project site[6]. The assessment included literature and database searches in addition to two field surveys to determine what special-status plant and wildlife species and sensitive habitats (including wetlands) have the potential to occur on or in the vicinity of the project site. The information and data collected for the assessment have been used as the basis of this biological resources analysis.

[6] Bill Arnerich "Biological Resource Assessment, 4707 Bloomfield Road, Petaluma, Sonoma County, California,94952" December 11, 2019.

Description of On-site Habitat
The parcel ranges from relatively flat to moderately sloping in some areas. The parcel contains grassland, some planted ornamentals, and a stand of Eucalyptus over 300 feet to the west of the project site. The project site is graded and flat composed of compacted gravel, bare dirt, gravel access roads, and areas of sparse ruderal vegetation.

Special-Status Plant Species
A literature review revealed eight (8) documented occurrences of special status plant species within Study Area. Although considered important biological resources regionally, none of these plants are expected to occur on the project site because their primary habitat requirements are lacking. Almost all of the species are associated with habitat types which do not occur on or adjacent to the project, such as vernal pools and seasonal wetlands, chaparral, coastal prairie and coastal scrub, forest, and woodland. Many species also require special soil types, such as adobe clay, volcanic, serpentine, or sand, all of which are lacking in the project site. The project site consists of previously graded and disturbed areas, where former quarry uses have removed most of the topsoil and native seedbank.

Surveys were performed within the project site January 6, and November 30, 2019. No special-status plant species were observed during the surveys. Although the surveys were conducted outside the blooming period of most plant species, the biologist was able to conclude that the sparse ruderal grassland habitats within the project site would have low potential to support special status plant species, and that no significant impacts to special status plants or potentially suitable habitat would occur.

Special Status Amphibian and other Aquatic Species
The site is not within designated critical habitat for any known special status amphibian or aquatic species. The project site does not support suitable habitat capable of supporting listed special status amphibian species such as California tiger salamander (CTS) or California red legged frog (CRLF), or other special status aquatic species such as Coho salmon. There is no known occurrence of CTS within a two-mile radius of the project site. No small mammal burrows were found to indicate potential over-summering habitat for frogs or salamanders at the time of the survey, and no work is proposed within a riparian zone or other water sources required to support this species or Coho salmon.

The biologist was able to conclude there is low potential for CTS, CRLF, or Coho salmon to occur within the Study Area and project site, and no significant impacts to special status amphibian or other aquatic species is likely to occur. Standard construction best management practices as required by Chapter 11 and Chapter 11A of the Sonoma County Code would be implemented to avoid secondary indirect impacts to any nearby water sources. In addition, Mitigation Measure BIO-1 prohibits use of plastic erosion control netting to protect wildlife from injury due to entanglement.

Special-Status Avian Species
Birds and raptors are protected under the federal Migratory Bird Treaty Act (50 CFR 10.13), and their nest, eggs, and young are also protected under the California Fish and Wildlife Code (§3503, §3503.5, and §3800). In addition, raptors such as the white-tailed kite are "fully protected" under the Fish and Wildlife Code (§3511). Fully protected raptors cannot be taken or possessed at any time. No special status birds or burrows appropriate for burrowing owl were observed during the field survey. Eucalyptus trees approximately 300-feet to the west of the project site may provide

suitable nesting habit for birds; other trees on the property provide only marginally suitable nesting habitat. No trees are proposed for removal. However, if nesting birds were present in trees at the project site, construction noise would have the potential to impact these species. Mitigation Measure BIO-2 would reduce the impact to nesting birds to a less than significant level.

Special-Status Bat Species
Bats may roost in tree cavities or old structures, such as barns. There is one occurrence of the western red bat, a special-status bat species, within two miles of the project site. No tree removal or use of existing structures are proposed. There are no structures with suitable bat habitat, but the eucalyptus stand (300-feet away) could be used as suitable habitat. Mitigation Measure BIO-3 would reduce any potential impact to special status bats to a less than significant level.

Light Pollution
The proposed greenhouse would include large, opaque, electronically controlled curtains designed to fully contain the interior lights such that no light would escape between sunset and sunrise. Proposed security lighting would be fully shielded, downward casting, and motion-sensor controlled to remain off unless needed. Therefore, the proposed project would not create a new source of substantial artificial light affecting wildlife and associated ecosystems.

Significance Level: Less than Significant Impact with Mitigation Incorporated

Mitigation:

Mitigation Measure BIO-1: Prohibition on Plastic Erosion Control Netting. Plastic monofilament or loosely woven erosion control netting, or any similar materials that may entangle special-status wildlife, shall not be installed. Suitable erosion control measures include natural materials that are 100% biodegradable, such as natural fiber netting and straw.

Mitigation Monitoring BIO-1 Prohibition on Plastic Erosion Control Netting. Prior to issuance of grading or building permits, Permit Sonoma staff shall ensure that mitigation measures are listed on all site alteration, grading, building or improvement plans. Prior to final of grading or building permits, Permit Sonoma staff shall confirm installation of wildlife friendly erosion control measures by site visit or photographic documentation.

Mitigation Measure BIO-2: Prevent Disturbance to Nesting Birds. The following measures shall be taken to avoid potential inadvertent destruction or disturbance of nesting birds on and near the project site as a result of construction-related vegetation removal and site disturbance:

a. To avoid impacts to nesting birds, all construction-related activities (including but not limited to mobilization and staging, clearing, grubbing, vegetation removal, fence installation, demolition, and grading) shall occur outside the avian nesting season (generally prior to February 1 or after August 31). Active nesting is present if a bird is sitting in a nest, a nest has eggs or chicks in it, or adults are observed carrying food to the nest.

b. If construction-related activities are scheduled to occur during the nesting season (generally February 1 through August 31), a qualified biologist shall conduct a habitat assessment and pre-construction survey for nesting birds, including ground nesting species such as burrowing owl,

no more than seven (7) days prior to initiation of work. The qualified biologist conducting the surveys shall be familiar with local nesting bird and ground-nesting species including burrowing owl. Surveys shall be conducted at the appropriate times of day during periods of peak activity (i.e., early morning or dusk) and shall be of sufficient duration to observe movement patterns. Surveys shall be conducted within the project area and 250 feet of the construction limits for nesting non-raptors and 1,000 feet for nesting raptors and burrowing owls as feasible. If the survey area is found to be absent of nesting birds, no further mitigation would be required. However, if project activities are delayed by more than seven days, an additional nesting bird shall be performed.

c. If pre-construction nesting bird surveys result in the location of active nests and or burrows, no site disturbance (including but not limited to equipment staging, fence installation, clearing, grubbing, vegetation removal, fence installation, demolition, and grading) shall occur until a qualified biologist has established a temporary protective buffer around the nest(s). The buffer shall be of sufficient size to protect the nesting site from construction-related disturbance and shall be established by a qualified biologist. No-work buffers are species- and site-specific, as determined by a qualified biologist. Typically, the no-work radius is 100-250 feet for songbirds and up to 1,000 feet for special-status raptors and owls. The nest buffer, where it intersects the project site, shall be staked with orange construction fencing or orange lath staking. Any active nests and or burrows shall be monitored by a qualified biologist to ensure compliance with the relevant Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC) requirements. The biologist shall document monitoring efforts and provide documentation to the applicant and County. No-work nest protection buffers may be removed and/or reduced if the qualified biologist determines the young have fledged the nest, the nest has otherwise become inactive due to natural cause (i.e., storm events or predation), or if the qualified biologist determines in coordination with CDFW that construction activities are not likely to adversely affect the nest. The qualified biologist and CDFW may agree upon an alternative monitoring schedule depending on the construction activity, season, and species potentially subject to impact.

d. A report of the findings shall be prepared by a qualified biologist and submitted to the County prior to the initiation of construction-related activities that have the potential to disturb any active nests and or burrows. The report shall include recommendations required for establishment of protective buffers as necessary to protect nesting birds and ground nesting species. A copy of the report shall be submitted to the County and applicable regulatory agencies prior to the issuance of a grading permit.

Mitigation Measure BIO-3 Roosting Bat Pre-Construction Survey(s): If initial ground disturbance or building demolition occurs during the bat maternity roosting season (May 1 through August 31), a qualified biologist shall conduct a bat roost assessment of trees and structures within 100 feet of the construction site. Surveys shall be conducted immediately prior to construction (within 1 to 2 days). If the biologist determines there is potential for maternity roosting bats to be present within 100 feet of the project site, nighttime emergence surveys shall be performed to determine if maternity roosting bats are present. If bat maternity roosts are present, the biologist shall establish an appropriate exclusion zone around the maternity roost. Once the biologist has determined that all young have become independent of the roost, construction may take place in the former exclusion zone.

Mitigation Monitoring: **BIO-2 and BIO-3 Pre- Construction Surveys**: Prior to construction and through completion of initial site disturbance, Permit Sonoma staff shall verify that all surveys have been conducted according to applicable protocols and shall review the results of all pre-construction surveys and any measures recommended by the biologist to avoid sensitive habitat or species and ensure compliance. If the survey determines protective buffers are necessary, ground disturbing activities shall not be initiated until the applicant provides evidence that nest protection buffers are flagged and fenced off and active nest monitoring has been initiated.

A final monitoring report shall be submitted to the County within 30 days of the completion of ground disturbing activities.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Comment:
Field surveys conducted for the project confirmed that the only habitat types present within the project footprint are non-sensitive disturbed and ruderal land. A total of two sensitive biological communities were found to occur in the vicinity of the proposed Project Site: Non-native Grassland and Seasonal Wetlands are adjacent and to the south of the Study Area. The project site does not contain any seasonal wetlands or designated riparian corridors. The project will be set back at least 50 feet from any seasonal wetland and is located beyond the 50-foot designated streamside conservation area established by the county. This conservation area applies to the designated riparian corridor across the street from the project site. The project site is located down gradient from both sensitive habitats and over 150-feet from the designated Riparian Corridor, and no work is proposed in a riparian zone. Therefore, the project would not affect riparian habitat or any other sensitive natural community.

Significance Level: Less than Significant Impact

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Comment:
The proposed project would not fill any waterway or wetlands. There would be no removal or hydrological interruption with project approval. The project is not in a wetland area. All development would be approximately 150 feet from the nearest seasonal wetland, which is adequate to ensure no indirect impacts to wetlands would occur. Therefore, the project would not affect wetland habitat.

Significance Level: No Impact

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Comment:

The project site is located within a former rock quarry, which was decommissioned prior to 1980, and has since been graded to control storm water runoff. The site consists of compacted gravel, bare dirt and gravel access roads and areas of sparse ruderal vegetation cover. The project site is located within an existing graveled area, which has historically been used for agricultural equipment staging and parking since at least 2001 when the parcel came under current ownership. There are a few ornamental trees and a stand of eucalyptus over 300-feet west of the project site. The project site does not contain suitable habitat for any sensitive species and does not contain any sensitive habitat types. Although there are two sensitive habit types in the vicinity of the Study Area, the project site is downgradient from both, and not within a riparian area as stated in 4b.

Although the project does not propose to remove trees, which could supply habitat for nesting birds or roosting bats, impacts could occur during construction activities if noise or other disturbance were to cause the birds or bats to abandon an active nest or an active roosting site. Because most of the construction impacts from project development would be confined to an area of disturbed and ruderal habitat, project impacts on special-status species would largely be limited to potential inadvertent destruction or disturbance of nesting birds on and near the project site as a result of a construction-related tree and/or vegetation removal and site disturbance.

Migratory bird species could potentially occur onsite. Many common bird species including their eggs and young are given special protection under the Migratory Bird Treaty Act of 1918 (Migratory Bird Act). Impacts to migratory birds are typically avoided by removing vegetation and conducting ground-disturbing activities only between September 1 and February 15 to avoid bird-nesting season, by having a qualified biologist verify absence immediately prior to vegetation removal, or by employing exclusionary bird netting during the nesting season. Mitigation Measure BIO-2 would reduce potential project impacts on nesting birds and roosting bats to a less than significant level.

Significance Level: Less than Significant Impact with Mitigation Incorporated

Mitigation:
Mitigation Measure BIO-2: Prevent Disturbance to Nesting Birds.

Mitigation Monitoring:
Mitigation Monitoring: **BIO-2 and BIO 3 Pre-Construction Surveys**

e) Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?

Comment:
The project site is located in an area with a 50-foot Riparian Corridor protection designation (RC 50-Riparian Corridor), however no work is proposed in a riparian zone and the nearest County designated Riparian Corridor is located across Bloomfield Road over 150-feet from the proposed project site. Additionally, no tree removal is proposed. Therefore, the project would not conflict with any local resource protection policies or ordinances. No impact would occur.

Significance Level: No Impact

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state Habitat Conservation Plan?

Comment:
Habitat conservation plans and natural community conservation plans are site-specific plans to address effects on sensitive species of plants and animals. There are no adopted habitat conservation plans or natural community conservation plans covering the project area, nor is the project site located in the Santa Rosa Plain. Therefore, the proposed project would not be subject to any habitat conservation plan or natural community conservation plan and would not conflict with any such plans.

Significance Level: No Impact

5. CULTURAL RESOURCES:

Would the project:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

Comments:
The project site is graded and flat within an existing graveled area. The project site was previously utilized a rock quarry, formerly known as Bloomfield Quarry, according to the 1980 Aggregated Resources Management plan. The quarry was decommissioned sometime prior to 1980, and the site been used for agricultural equipment staging and parking since at least 2001 when the parcel came under current ownership. There are no permanent structures within the proposed project site. The project site was graded to manage water flow, storm water run-off and sediment and erosion control in 2019.

Significance Level: No Impact

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Comment:
The project was referred to the Northwest Information Center (NWIC) on February 2, 2021. A response was received on February 25, 2021, stating the proposed project area has a low possibility of containing unrecorded archaeological sites, and therefore did not recommend a study. Therefore, no impacts to archaeological resources are anticipated.

On February 2, 2021, Permit Resource Management Department (PRMD) staff referred the project application to Native American Tribes within Sonoma County to request consultation under AB52 (the request for consultation period ended 30 days later March 4, 2021). No requests for consultation were received.

The project proposes construction of new structures within the former Bloomfield Quarry site as discussed in 5a. The NWIC concluded that there is a low possibility the project site contains unrecorded archaeological sites. In addition, the County also has a standard “accidental discovery”

condition of approval that work be halted if unanticipated buried cultural resources are encountered during construction. The condition is applied to all use permits that involve ground disturbance, and requires that the following notes be printed on all grading and building permit plans involving ground disturbing activities:

> "If prehistoric or historic archaeological resources, paleontological resources, or tribal cultural resources are encountered during ground-disturbing work, all work in the immediate vicinity shall be halted and the operator must immediately notify the Permit and Resource Management Department (PRMD) – Project Review staff of the find. The applicant shall be responsible for the cost to have a qualified paleontologist, archaeologist or tribal cultural resource specialist under contract to evaluate the find and make recommendations to protect the resource in a report to PRMD. Paleontological resources include fossils of animals, plants or other organisms. Prehistoric resources include humanly modified stone, shell, or bones, hearths, firepits, obsidian and chert flaked-stone tools (e.g., projectile points, knives, choppers), midden (culturally darkened soil containing heat-affected rock, artifacts, animal bone, or shellfish remains), stone milling equipment, such as mortars and pestles, and certain sites features, places, cultural landscapes, sacred places and objects with cultural value to a California Native American tribe. Historic resources include all by-products of human use greater than fifty (50) years of age including, backfilled privies, wells, and refuse pits; concrete, stone, or wood structural elements or foundations; and concentrations of metal, glass, and ceramic refuse.
>
> If human remains are encountered, work in the immediate vicinity shall be halted and the operator shall notify PRMD and the Sonoma County Coroner immediately. At the same time, the operator shall be responsible for the cost to have a qualified archaeologist under contract to evaluate the discovery. If the human remains are determined to be of Native American origin, the Coroner must notify the Native American Heritage Commission within 24 hours of this identification so that a Most Likely Descendant can be designated and the appropriate measures implemented in compliance with the California Government Code and Public Resources Code."

Therefore, the proposed project would not result in substantial adverse change in the significance of archaeological resource as defined in CEQA Guidelines Section 15064.5.

Significance Level: Less than Significant Impact

c) Disturb any human remains, including those interred outside of formal cemeteries?

Comment:
No burial sites are known in the vicinity of the project area, and the site was previously excavated and disturbed by its former us as a quarry, which has since been decommissioned. Although the site would be disturbed by construction activities; based on comments from NWIC there is a low potential for buried archaeological sites in the project footprint. In the unlikely event the site contains a burial site, compliance with Sections 11-14-050 and 26-88-254(14) of the Sonoma County Code noted above would ensure necessary steps are taken to protect the resource.

Significance Level: Less than Significant Impact

6. ENERGY:

a) Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Comment:
Project construction would include temporary use of equipment such as bulldozers, excavators, skid steers, compactors, and boom lifts for limited periods. Long-term energy demand would result from employees working on the project site and from employee vehicle trips as discussed in section 17, Transportation. The proposed cannabis operation would also result in energy usage from electricity for lighting, odor reducing fans, the security system (e.g., alarm, lights, cameras), and water and wastewater pumps.

The proposed project in Sonoma County is expected to increase energy consumption compared to the current conditions due to the nature of indoor and mixed-light cultivation operations. These operations involve the use of energy-intensive lighting and ventilation systems that may run 24 hours a day and require year-round irrigation. To mitigate energy usage and enhance efficiency, the project includes the use of high-efficiency LED lighting for both artificial cultivation lighting and standard building lighting, as well as the installation of high-efficiency insulation for all indoor structures. All HVAC equipment will use zero Chlorofluorocarbons (CFCs) or Halons, bicycle parking would be installed for employees, and employees for the cannabis operation and contractors for construction would be sourced locally to decrease vehicle miles travelled. In addition, Sonoma County Code requires that electrical power for cannabis cultivation and processing operations be obtained from a renewable source; the applicant proposes to purchase 100 percent renewable energy from the Sonoma Clean Power EverGreen program.

Non-cultivation activities will involve minimal energy and water use for security systems, lighting and heating/cooling systems in employee offices and breakrooms, and breakroom appliances. The lighting plan includes night lighting for security and safety purposes only. All security lighting would be equipped with motion sensors to only be used when needed. The project incorporates a rainwater capture system and the recycling and reuse of greywater to reduce as well as a timer/senser-driven drip irrigation system to improve efficiency and conserve water. Rainwater capture systems primarily use gravity to move water throughout a system whereas pumping only through the well would require more energy. Therefore, the project is not expected to result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

Significance Level: Less than Significant Impact

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Comment:
The proposed project would be required to comply with local energy efficiency standards as defined in County Code Chapter 7 (Building Regulations), which specifies Title 24, Part 6 of the California Code of Regulations, California Energy Code (Building Energy Efficiency Standards), as the County standard for buildings.

Significance Level: No Impact

7. GEOLOGY AND SOILS:

Existing geologic conditions that could affect new development are considered in this analysis. Impacts of the environment on the project are analyzed as a matter of County policy and not because such analysis is required by CEQA.

Would the project:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Comment:
The project site is not within a fault hazard zone as defined by the Alquist-Priolo fault maps.[7] The nearest fault line is the San Adreas Fault approximately 8.5 miles west of the project site.

Significance Level: No Impact

ii. Strong seismic ground shaking?

Comment:
All of Sonoma County is subject to seismic shaking that would result from earthquakes along the San Andreas, Healdsburg-Rodgers Creek, and other faults. The site's proximity to the San Andreas fault (8.5 miles west of project site), indicates that the intensity of ground shaking and damage from anticipated future earthquakes in the project area is categorized as 'Very Strong' according to the County's General Plan Public Safety Element.[8]

Predicting seismic events is not possible, nor is providing mitigation that can entirely reduce the potential for injury and damage that could occur during a seismic event. However, by applying geotechnical evaluation techniques and appropriate engineering practices, potential injury and damage from seismic activity can be diminished, thereby exposing fewer people and less property to the effects of a major damaging earthquake. The design and construction of new structures are subject to engineering standards of the California Building Code (CBC), which take into account soil properties, seismic shaking and foundation type. Standard conditions of approval require that building permits be obtained for all construction and that the project meet all standard seismic and soil test/compaction requirements. Therefore, the potential impact from strong seismic ground shaking would be less than significant.

Significance Level: Less than Significant Impact

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[7] California Department of Conservation, Earthquake Zones of Required Investigation, Earthquake Zones of Required Investigation (ca.gov), accessed January 15, 2023.
[8] Sonoma County. 2008. Sonoma County General Plan 2020. Public Safety Element, "Earthquake Ground Shaking Hazard Areas Figure PS-1a." Public Safety: Earthquake Ground Shaking Hazard Areas (permitsonoma.org), January 15, 2023.

iii. Seismic-related ground failure, including liquefaction?

Comment:
Strong ground shaking can result in liquefaction, the sudden loss of shear strength in saturated sandy material, resulting ground failure. Areas of Sonoma County most at risk of liquefaction are along San Pablo Bay and in alluvial valleys. According to the General Plan Public Safety Element Liquefaction Hazard Areas Map[9] the project site is not located in area with a designated Liquefaction Hazard rating (Medium, High, or Very High). As stated above, structures are subject to engineering standards of the California Building Code, which require that the project meet all standard seismic and soil test/compaction requirements. Therefore, the potential impact from liquefaction would be less than significant.

Significance Level: Less than Significant Impact

iv. Landslides?

Comment:
Steep slopes characterize much of Sonoma County, particularly the northern and eastern portion of the County. Where these areas are underlain by weak or unconsolidated earth materials landslides are a hazard. According to the ABAG Hazard Viewer maps the project site is located in area designated as "Flat Land" [10]. Additionally, according to the General Plan Public Safety Element Landslide Hazard Areas Map (Figure PS-1d), the project site has a Slope Class of 0 and is not located in a designated Landslide Hazard Area[11].

Significance Level: No Impact

b) Result in substantial soil erosion or the loss of topsoil?

Comment:
The project proposes construction of all new facilities and is located on an existing graded graveled area. The project site was graded to manage water flow, storm water run-off and sediment and erosion control in 2019. Furthermore, erosion and sediment control provisions of the Drainage and Storm Water Management Ordinance (Chapter 11 Construction Grading and Drainage and Chapter 11A Stormwater Quality, Sonoma County Code) and Building Ordinance (Chapter 7, Sonoma County Code) requires implementation of flow control best management practices to reduce runoff. The Ordinance requires treatment of runoff from the two-year storm event. Required inspection by Permit Sonoma staff ensures that all grading and erosion control measures are constructed according to the approved plans. These ordinance requirements and adopted best management practices are specifically designed to maintain potential water quantity impacts at a less than significant level during and post construction. If project construction were to occur during wet

[9] Sonoma County. 2008. Sonoma County General Plan 2020. Public Safety Element, "Liquefaction Hazard Areas Fig. PS-1c." Accessed 1/12/2023, Public Safety: Liquefaction Hazard Areas (permitsonoma.org), January 15, 2023.
[10] MTC/ABAG, 2021. "Hazard Viewer Map," Available at: https://mtc.maps.arcgis.com/apps/webappviewer/index.html?id=4a6f3f1259df42eab29b35dfcd086fc8 last accessed January 15, 2023.
[11] Sonoma County General Plan 2020. Public Safety Element, Landslide Hazard Areas Figure PS-1d, https://permitsonoma.org/x105619, January 15, 2023.

weather however, it is possible that stormwater could carry soil offsite into local storm drains. This impact can be reduced to less than significant by using standard construction erosion control measures at the project site.

In regard to water quality impacts, County grading ordinance design requirements, adopted County grading standards and best management practices (such as silt fencing, straw wattles, construction entrances to control soil discharges, primary and secondary containment areas for petroleum products, paints, lime and other materials of concern, etc.), mandated limitations on work in wet weather, and standard grading inspection requirements, are specifically designed to maintain potential water quality impacts at a less than significant level during project construction.

For post construction water quality impacts, adopted grading permit standards and best management practices require that storm water to be detained, infiltrated, or retained for later use. Other adopted water quality best management practices include storm water treatment devices based on filtering, settling, or removing pollutants. These construction standards are specifically designed to maintain potential water quality grading impacts at a less than significant level.

Significance Level: Less than Significant Impact

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Comment:
The project site is not located within a High or Very High Liquefaction Hazard Area, or a designated Landslide Hazard Area. The project site is graded and flat within an existing graveled area. No project construction or operation is proposed on any non-graded area of the parcel. Additionally, the design and construction of new structures are subject to engineering standards of the California Building Code (CBC), which consider soil properties, seismic shaking and foundation type. The project would therefore not expose people to substantial risk of injury from seismic shaking. Therefore, the potential impact from landslides or liquefaction would be less than significant.

Significance Level: Less than Significant Impact

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Comment:
Table 18-1-B of the Uniform Building Code is an index of the relative expansive characteristics of soil as determined through laboratory testing. The project site is located within the boundary of a former rock quarry and consists of imported, non-native soil made of up of crushed rock and compacted gravel. According to the Natural Resources Conservation Service (NRCS), soils near the project site consist of Los Osos Clay Loam (15-30% slopes) which has a moderate to high shrink swell potential and Steinbeck Loam (2-9% slopes) which has a low shrink swell potential[12]. Additional compliance with standard Building Code requirements would ensure that potential soil expansion at the project site would be mediated through professional engineering design and practice. Therefore,

[12] Natural Resources Conservation Services Web Soil Survey. https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx, accessed January 15, 2023.

risks from expansive soils would be less than significant.

Significance Level: Less than Significant Impact

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

Comment:
The project site is not in an area served by public sewer. Soils on-site are capable of adequately supporting the use of septic tanks. The project site will include the construction of three new structures which will be served by a single new septic system. This septic system and leach field will be located west of the proposed structures and would comply with County regulations related to the disposal of wastewater.

Significance Level: Less than Significant Impact

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Comment:
The proposed project area has a low possibility of containing unrecorded paleontological resources or unique geologic feature. All native soils have already been removed and disturbed due to the former quarry use. No significant impacts are anticipated. However, to further reduce impacts Sonoma County Code Section 26-88-254(f)(14) provides standard procedures for protection of paleontological resources encountered during work at the project location:

"The following minimum standards shall apply to cultivation permits involving ground disturbance. All grading and building permits shall include the following notes on the plans:

"If paleontological resources or prehistoric, historic-period or tribal cultural resources are encountered during ground-disturbing work at the project location, all work in the immediate vicinity shall be halted and the operator must immediately notify the agency having jurisdiction of the find. The operator shall be responsible for the cost to have a qualified paleontologist, archaeologist and tribal cultural resource specialist under contract to evaluate the find and make recommendations in a report to the agency having jurisdiction.

"Paleontological resources include fossils of animals, plants or other organisms. Historic-period resources include backfilled privies, wells, and refuse pits; concrete, stone, or wood structural elements or foundations; and concentrations of metal, glass, and ceramic refuse. Prehistoric and tribal cultural resources include obsidian and chert flaked-stone tools (e.g., projectile. points, knives, choppers), midden (culturally darkened soil containing heat-affected rock, artifacts, animal bone, or shellfish remains), stone milling equipment, such as mortars and pestles, and certain sites features, places, cultural landscapes, sacred places and objects with cultural value to a California Native American tribe."

Significance Level: Less than Significant Impact

8. GREENHOUSE GAS EMISSIONS:

Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Comment:
Section 15064.4 of the State CEQA Guidelines assists lead agencies in determining the significance of the impacts of GHG emissions. Section 15064.4 gives lead agencies the discretion to assess emissions quantitatively or qualitatively. The CEQA Guidelines do not establish a threshold of significance. Lead agencies are granted discretion to establish significance thresholds for their respective jurisdictions, including looking to thresholds developed by other public agencies or other experts, so long as any threshold chosen is supported by substantial evidence.

The Bay Area Air Quality Management District's (BAAQMD) 2022 *Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects* acknowledges that evaluating climate impacts under CEQA can be challenging because global climate change is inherently a cumulative problem, rather than the result of a single source of greenhouse gas (GHG) emissions. With that in mind, the BAAQMD has recommended thresholds of significance as to whether a proposed project would have a "cumulatively considerable" contribution to the significant cumulative impact on climate change.

For land use development projects, the BAAQMD recommends using an approach which evaluates a project based on its effect on California's efforts to meet the State's long-term climate goals. Using this approach, a project that is consistent with and would contribute its "fair share" towards achieving those long-term climate goals can be found to have a less-than-significant impact on climate change under CEQA because the project would, in effect, help to solve the problem of global climate change. Applying this approach, the Air District has analyzed what will be required of new land use development projects to achieve California's long-term climate goal of carbon neutrality by 2045.

Because GHG emissions from the land use sector come primarily from building energy use and from transportation, these are the areas that the BAAQMD evaluated to ensure that a project can and will do its fair share to achieve carbon neutrality. With respect to building energy use, the BAAQMD recommends replacing natural gas with electric power and eliminating inefficient or wasteful energy usage. This will support California's transition away from fossil fuel–based energy sources and will bring a project's GHG emissions associated with building energy use down to zero as the state's electric supply becomes 100 percent carbon free. With respect to transportation, the BAAQMD recommends that projects be designed to reduce project-generated Vehicle Miles Travelled (VMT) and to provide sufficient electric vehicle (EV) charging infrastructure to support a shift to EVs over time.

The BAAQMB has found, based on this analysis, that a new land use development project being built today either must be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b), or must incorporate the following design elements to achieve its "fair share" of implementing the goal of carbon neutrality by 2045:

A. Projects must include, at a minimum, the following project design elements:
    1. Buildings

   a. The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).
   b. The project will not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.
2. Transportation
   a. Achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's (OPR) 2018 Technical Advisory on Evaluating Transportation Impacts in CEQA:
      i. Residential projects: 15 percent below the existing VMT per capita
      ii. Office projects: 15 percent below the existing VMT per employee
      iii. Retail projects: no net increase in existing VMT
   b. Achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.

There is currently no applicable local GHG reduction strategy, like an adopted Climate Action Plan, for Sonoma County. Therefore, the project was analyzed under criterium A above, as discussed below.

Buildings: As discussed in the Energy Section 6a, the project includes new construction. Plans for the new structures do not include the use of natural gas appliances or natural gas plumbing, the site will purchase electrical power from Sonoma Clean Power. The project does include the installation of a 2,000-gallon propane tank exclusively for emergency backup generator use. Emergency generators can be used only during power shut offs and other emergencies when on-grid power is not available. The aggregate use of new structures for non-cultivation activities would result in energy use similar to any small agricultural processing structure, including powering of lighting, heating/cooling systems, and employee support spaces, like offices and restrooms. However, indoor and mixed light cultivation operations include the use of energy intense lighting and ventilation systems, which could operate 24 hours per day. To minimize energy use and greenhouse gas emissions, the project incorporates several strategies: the use of high-efficiency LED lighting for cultivation and standard building lighting, the use of high-efficiency insulation for indoor structures, and HVAC equipment that does not use chlorofluorocarbons (CFCs) or halons. Additionally, the project encourages employee carpooling, hiring local employees, sourcing materials such as organic fertilizers locally, and composting green waste onsite. Therefore, impacts due to energy consumption would be less than significant.

Transportation: The cultivation project does not include new residences, office buildings, or commercial retail, and therefore, does not contribute any VMT to these three land use categories of concern. (Note that "office projects" refers to commercial office spaces, not to a small ancillary office space associated with another land use). The project would include construction of one greenhouse, one indoor cultivation structure, and one indoor propagation and centralized processing structure for commercial use.

As discussed in the Transportation Section 17b, VMT refers to the amount and distance of automobile travel attributable to a project. The County of Sonoma has not yet adopted specific VMT

policies or thresholds of significance. However, the OPR Technical Advisory includes a screening threshold for small projects that generate or attract fewer than 110 trips per day, stating this level of vehicle activity may generally be assumed to result in a less than significant transportation impact. The maximum average daily vehicle trips associated with the project is below the aforementioned threshold. The project also proposes to implement a local hiring plan, so although distance travelled for employee trips has not been estimated, it is reasonable to assume that employees would primarily be hired from the local area and would generate relatively few travel miles associated with in-county commuter trips.

The maximum number of employee generated daily trips is 57 (if all 19 employees were to travel to the site in a day); delivery/vendor truck trips are estimated at 217 truck trips per year (approximately four truck trips per week or less than one trip per day). Therefore, the total average daily trips estimated for the project would conservatively round up to 58, well below the OPR threshold of 110 trips per day. Distance-related vehicle miles are anticipated to be low due to the proposed plan to hire from the local workforce, encouraging employees to carpool, proposed bicycle parking, and offering centralized processing to support cultivation operations in west county. Currently, Sonoma County has two operational centralized cannabis processing facilities, one in north Santa Rosa near the Sonoma County Airport industrial area, and one in central Sonoma Valley at the intersection of Trinity Road and Highway 12 in Glen Ellen. There are currently no operational centralized cannabis processing facilities located in or serving west Sonoma County. Although truck trips are a small component of the overall project VMT, the project would be expected to lead to a reduction in regional VMT for cannabis processing truck trips, as cannabis growers in western Sonoma County would be most likely to transport their crops to the nearest processing facility. The proposed centralized processing facility would allow approved local operators an alternative to transporting cannabis to Santa Rosa, Sonoma Valley, or outside of the County to be processed, reducing overall VMT. The project is expected to have a less than significant VMT impact.

The latest California Green Building Standards Code (CALGreen) was published in 2022 and went into effect, with any local amendments, on January 1, 2023. The 2022 CALGreen Tier 2 requirements for EV changing stations apply to new non-residential buildings and require that off-street EV capable spaces be provided for new non-residential development projects with 10 or more parking spaces (note there are separate EV requirements for residential projects). The cultivation project proposes 21 all-weather parking spaces, including designated EV capable charging stations as required by the current CALGreen Standards.

The BAAQMD 2022 guidance does not propose construction-related climate impact thresholds, stating that GHG emissions from construction represent a very small portion of a project's lifetime GHG emissions, and that land use project thresholds are better focused on addressing operational GHG emissions, which represent the vast majority of project GHG emissions. Project construction activities would result in a less than significant impact.

Because the project does not propose the use of natural gas, would use minimal energy, does not include new residential, office, or retail uses, would generate low VMT, and meets 2022 CALGreen requirements for EV charging stations, the project would contribute its "fair share" towards achieving the State's long-term climate goals, and therefore, would have a less-than-significant impact on climate change.

Significance Level: Less than Significant Impact

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Comment:
The County does not have an adopted Climate Action Plan but has adopted a Climate Change Action Resolution (May 8, 2018) which resolved to reduce GHG emissions by 40% below 1990 levels by 2030 and 80% below 1990 levels by 2050, and noted twenty strategies for reducing GHG emissions, including increasing carbon sequestration, increasing renewable energy use, and reducing emissions from the consumption of good and services. The project has proposed to incorporate many GHG reduction strategies, including: limited use of petrochemical fertilizers, utilization of local vendors for deliveries, and the hiring of local employees for the on-site workforce, thereby reducing vehicle emissions from daily trips.

By incorporating multiple GHG reduction strategies, the project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Significance Level: No Impact

9. HAZARDS AND HAZARDOUS MATERIALS:

Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Comment:
Construction and operation of the project may involve the intermittent transport, storage, use and disposal of potentially hazardous materials, including fuels and lubricants, paints, solvents, and other materials commonly used in construction. During construction activities, any on-site hazardous materials that may be used, stored, or transported would be required to follow standard protocols (as determined by the U.S. EPA, California Department of Health and Safety, and Sonoma County) for maintaining health and safety. Improper transit, storage, or handling of these materials could result in spills. This potential impact would be reduced to a less than significant level with implementation of standard approved construction methods for handling hazardous materials.

In addition, plant nutrients, fertilizers, fungicides, and approved algaecides may be used during the cultivation operation. Quantities of bulk nutrients are normally transported and stored in plastic containers and then diluted with water to a solution for use on plants. Plant nutrients and fertilizers would be stored in a secure locked enclosure without exposure to weather, sunlight, or wind. These materials would be stored on pallets and/or shelving to minimize the possibility of spills and leaks going undetected. Liquid products would be stored in secondary containment, where needed. Generally, there is no disposal of agricultural chemicals since they are applied to and taken up by the plants. Any disposal of unused plant chemicals would be minor, and the material would be taken to an appropriate solid waste disposal location as identified in product disposal instructions (most are safe for landfill disposal). No impacts are anticipated related to the routine transport, use, or disposal of small amounts of agricultural chemicals. As a condition of approval, the project would be

required to comply with the following Operating Standard:

> *"All cultivation operations that utilize hazardous materials shall comply with applicable hazardous waste generator, underground storage tank, above ground storage tanks, and any AB 185 (hazardous materials handling) requirements and maintain any applicable permits for these programs from the Fire Prevention Division, Certified Unified Program Agency (CUPA) of Sonoma County Fire and Emergency Services Department, or the Agricultural Commissioner (Sec 26-88- 254(g)(4))."*

Project operation is also required to be consistent with California Department of Food and Agriculture Cannabis Regulations (CDFACR) Sections 8102(q), 8106(a)(3), 8304(f) and 8307 which further regulate hazardous materials. With existing General Plan policies and federal, State, and local regulations and oversight of hazardous materials, and project compliance with County Code standards, the potential threat to public health and safety or the environment from hazardous materials transport, use or disposal would represent a less than significant impact.

Significance Level: Less than Significant Impact

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Comment:
The project proposes to use organic pesticides, herbicides, and/or fungicides and would maintain a plan for appropriate use and disposal of these materials, subject to review by Sonoma County and CDFACR. As discussed in section 9.a above, during construction there could be spills of hazardous materials, however potential impacts would be reduced to a less than significant level with implementation of standard approved construction methods for handling hazardous materials. See 9(a) above. Agricultural chemicals such as plant nutrients, fertilizers, approved pesticides and fungicides, will be stored in a manner which allows leaks to be easily detected and contained. After being diluted in water the agricultural chemicals will be administered to the plants in a controlled irrigation system which will be monitored for leaks and repaired immediately if damaged.

As discussed in section 9.a, with existing General Plan policies and federal, State, and local regulations, oversight of hazardous materials, and project compliance with County Code standards, the potential threat to public health and safety or the environment from accidental release of hazardous materials into the environment would be less than significant.

Significance Level: Less than Significant Impact

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Comment:
No existing or proposed schools are located within one-quarter mile of the project site. The nearest school, Twin Hills Middle School, is over 3 miles to the northeast of the project parcel.

Significance Level: No Impact

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Comment:
There are no known hazardous materials sites on the project site or within 5,000 feet, based on a review of the following databases (commonly known as the Cortese List) on March 23, 2023.

1. The State Water Resources Control Board Geotracker database,[13]
2. The California Department of Toxic Substances Control EnviroStor database (formerly known as Calsites),[14] and
3. The CalRecycle Solid Waste Information System (SWIS)[15].

Significance Level: No Impact

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

Comment:
The site is not within the Airport Referral Area as designated by the Sonoma County Comprehensive Airport Land Use Plan, or within two miles of the Petaluma Municipal Airport, or other Public Use Airport.

Significance Level: No Impact

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Comment:
The project would not impair implementation of, or physically interfere with, the County's adopted emergency operations plan. There is no separate emergency evacuation plan for the County. The project would not change existing circulation patterns, would not generate substantial new traffic, and would not affect emergency response routes. Refer to Section 17 - Transportation, for further discussion of emergency access and project traffic.

Significance Level: No Impact

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Comment:

[13] State Water Resources Control Board. "Geotracker Database," https://geotracker.waterboards.ca.gov/, accessed March 23, 2023.
[14] Department of toxic Substances Control. "Envirostor Database", https://www.envirostor.dtsc.ca.gov/public/, accessed March 23, 2023.
[15] Cal Recycle. "Waste Information System (SWIS) Facility/Site Search," https://www2.calrecycle.ca.gov/SolidWaste/Site/Search, accessed March 23, 2023.

According to the Wildland Fire Hazard Area Map (Figure PS-1g)[16] in the Sonoma County General Plan, the project site is located in the lowest Fire Hazard Severity Zone designated as Moderate and is not within a Wildland Urban Interface. Moderate Zones are generally located in grasslands and valleys, away from significant forested or chaparral wildland vegetation, as is the case with the project site. Both State Fire Safe Regulations (14 CCR 1270.00 et seq.) and County Code require projects located in High and Very High Fire Severity Zones to have a detailed vegetation management plan developed and reviewed by the Sonoma County Fire Prevention Division before a building permit can be issued. This requirement does not apply to projects located in a Moderate Zone. However, all construction projects must comply with County Code Fire Safe Standards (Chapter 13), including but not limited to, installing fire sprinklers in buildings, providing emergency vehicle access, and maintaining a dedicated fire-fighting water supply on-site, and vegetation management.[17] The proposed project is not located in a High or Very High Wildland Fire Hazard Area and would comply with all Fire Safe Standards. Therefore, the project would not be likely to expose people or structures to a significant risk of loss, injury or death involving wildland fires.

Significance Level: Less than Significant Impact

10. HYDROLOGY AND WATER QUALITY:

Would the project:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Comment:
The project includes new construction on a previously graded and flat area within existing within an existing graveled area.

The project site located adjacent to a County designated Riparian Corridor, an unnamed tributary of Americano Creek, with a 50-foot development setback to protect the riparian corridor. The project is located across Bloomfield Road over 100-feet away from the Riparian Corridor exceeding the setback. No outdoor cultivation is proposed, and the site was previously graded in order to control storm water runoff. The project is subject to additional regulations intended to protect surface and groundwater quality, as described below.

On October 17, 2017, the State Water Resources Control Board adopted the Cannabis Cultivation Policy (Cannabis Policy) and the Statewide Cannabis General Order WQ 2017-0023-DWQ (Cannabis General Order) for General Waste Discharge Requirements and Waiver of Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities. The Cannabis Policy and Cannabis General Order include requirements to reduce impacts of waste discharges and

[16] Sonoma County General Plan 2020, Public Safety Element Figure PS-1g. https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/Archive/Department%20Information/Cannabis%20Program/_Documents/General-Plan-Map_PS1g.pdf, accessed March 23, 2023.
[17] Permit Sonoma Fore Prevention and Hazardous Materials Hazardous Vegetation Inspection & Abatement webpage. https://permitsonoma.org/divisions/firepreventionandhazmat/servicesandfees/vegetationmanagementservices, accessed March 23, 2023.

surface water diversions associated with cannabis cultivation. The Order requires submittal of a Site Management Plan describing BMPs to protect water quality, and may also require a Site Erosion and Sediment Control Plan, Disturbed Area Stabilization Plan, and/or Nitrogen Management Plan, depending on size and site characteristics of the operation. All outdoor commercial cultivation operations that disturb an area equal to or greater than 2,000 square feet of soil are required to enroll. Most commercial indoor cannabis cultivation operations are conditionally exempt but must enroll in the program to obtain documentation of their conditionally exempt status. Compliance with the Cannabis General Order is a standard condition of approval for all cannabis permits.

The Sonoma County Department of Agriculture/ Weights & Measures has prescribed cannabis cultivation Best Management Practices related to pesticide and fertilizer storage and use, riparian protection, water use and storage, waste management, erosion control/grading and drainage, and items related to indoor cultivation. Annual inspections are required to confirm compliance with these standards.

Project construction and grading would be minimal but would still need to meet all applicable County grading and drainage requirements (County Code Chapter 11--Construction Grading and Drainage Ordinance). Required inspections by Permit Sonoma staff would ensure that water quality standards and erosion control measures would be maintained according to the approved project plans and applicable policy regulations.

Application of these standard County requirements, State wastewater discharge requirements, and County conditions of approval would reduce project stormwater runoff and water quality impacts to a less than significant level.

Significance Level: Less than Significant Impact

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Comment:
The site is located within a Class 2 - Major natural recharge groundwater availability area, and within a very low priority groundwater basin, as designated by the Sustainable Groundwater Management Act. A Hydrogeologic Report was prepared to address potential groundwater impacts under CEQA.[18]

The hydrogeologic report identified the cumulative amount of development and uses allowed in the area and assessed the impact of the proposed project's groundwater use on overdraft conditions, land subsidence, surface water resources, and neighboring wells.

Table 4. Onsite Water Use:

Cultivation Water Use		
	Mixed Light Cultivation:	344,560 gallons/year
	Indoor Cultivation:	143,374 gallons/year

[18] Hurvitz Environmental Services, Inc., "Hydrogeologic Assessment Report, 4707 Bloomfield Rd, Petaluma, CA", dated January 26, 2022.

Propagation:	24,517 gallons/year
Employees:	27,375 gallons/year
Total Cultivation Water Use	**539,826 gallons/year or ~1.66 acre-feet/year**
Rainwater Capture:	275,101 gallons/year
Recycled Water (captured from onsite uses):	65,700 gallons/year
Total Offsets	**340,801 gallons/year or ~1.05 acre-feet/year**
Total NET Cultivation Groundwater Use	**199,025 gallons/year or ~0.61 acre-feet/year**
Other Groundwater Use	
Horses:	8,541 acre-feet/year
Landscaping:	205,286 gallons/year
Total Other Groundwater Use	**213,827 gallons/year or ~0.66 acre-feet**

So, total groundwater use onsite can now be calculated as follows:

199,025 gallons/year (groundwater used for cannabis) + 213,827 gallons/year (groundwater used for horses, landscaping) =
412,852 gallons/year or 1.27 acre-feet/year = Total Groundwater Use Onsite

Water Use Impact Analysis
The hydrogeologic assessment evaluated potential cumulative impacts based on the known geologic, hydrologic, and groundwater characteristics in the area. Given the generally large parcel size in the area the cumulative impact area (CIA) for the study was a 925-acre polygon with the project site in the approximate center. The CIA encompassed 37 separate properties, ranging in size from 1.57-acres to 480-acres. Most are engaged in commercial agriculture (grazing); thirty-two (32) are developed with at least one primary residence, five (5) are pasture only with no residence.

The total aquifer storage value in the area was calculated at 11,933 acre-feet with an annual recharge rate of 247 acre-feet, and 123.5 acre-feet during drought years. The total CIA annual onsite water demand, excluding the project, was estimated to be 54.25 acre-feet (21.9% of non-drought year recharge, and 43.9% of drought year recharge), and estimated potential future demand to be 72.68 acre-feet (29.4% of non-drought year recharge, and 58.8% of drought year recharge), which are both less than 1 percent of the total calculated aquifer storage capacity in the cumulative impact area. The estimated annual water demand for the cannabis project is 1.66 acre-feet (including employees), however almost two-thirds (1.05 acre-feet/year) of the annual cannabis irrigation water demand will come from the applicants proposed onsite rainwater capture and recycled water systems, leaving the total groundwater demand at 0.61 acre-feet. Recycled water will come from a series of dehumidifiers placed in the indoor and mixed light cultivation structures that will capture water from the air to be re-used for irrigation purposes. The study concluded that total annual water demand proposed for the site including cannabis, landscaping, gardens, and livestock use (approximately 2.3 acre-feet per year without estimated offsets; 1.27 acre-feet/year with water re-use and rainwater capture offsets) is sustainable based on current and future development within the CIA.

In addition, the study found that ground water demand proposed for the Site is not significant with

respect to the potential future conditions (approx. 0.8%) in the Cumulative Impact Area. Therefore, the report concluded that pumping and groundwater extraction from the Site for the proposed cannabis project is not likely to create an overdraft condition at this time and would be sustainable for the foreseeable future. The study determined that pumping and groundwater extraction at the proposed Project Irrigation Well will not significantly impact neighboring wells or stream flow conditions in nearby creeks.

Conditions of approval require well monitoring and limit groundwater use in accordance with the proposal to employ rainwater capture and water reuse. Although the hydrogeologic study determined that no significant impact to groundwater resources would result from on-site water use of 2.3 acre-feet per year, to further reduce potential groundwater impacts, total well water use for the project, inclusive of employee uses and irrigation of cannabis, will be limited to 1.0 acre-feet per year by condition of approval. This condition of approval allows flexibility for years when the project maximum amount of rainwater capture or recycled water re-use cannot be obtained (340,801 gallons or 1.05 acre-feet), but also requires that at least 215,000 gallons (0.66 acre-feet) be obtained, or that irrigation, and corresponding canopy amount, be reduced to protect and conserve water resources. Based on the hydrogeologic study and as enforced through conditions of approval, the project will have a less than significant groundwater impact.

Significance Level: Less than Significant Impact

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site?

Comment:
Construction activities associated with the proposed project are not anticipated to alter the existing drainage pattern of the site or area in a way that would result in downstream erosion and/or sedimentation. The project is located on previously disturbed land formerly utilized as a rock quarry and is within an existing graveled area. Additionally, all construction activities are required to adhere to Sonoma County Code Sections 11-14-040 and 26-88254 requiring that best management practices be incorporated in project activity to further control surface water runoff. Runoff and stormwater control requirements for cannabis cultivation prohibit draining of runoff to the storm drain system, waterways, or adjacent lands. Prior to beginning grading or construction, the operator is required to prepare a storm water management plan and an erosion and sediment control plan for County review and approval, including best management practices for erosion control during and after construction and permanent drainage and erosion control measures pursuant to Chapter 11 of the County Code. All cultivation operators are required to comply with the best management practices for cannabis cultivation issued by the Agricultural Commissioner for management of wastes, water, erosion control and management of fertilizers and fires, Section 26-88-254(f)(20).

Compliance with SWRCB Cannabis General Order WQ 2019-0001-DWQ (Cannabis General Order) for General Waste Discharge Requirements and Waiver of Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities, effective as of April 16, 2019, requires submittal of a Site Management Plan describing best management practices (BMPs) to protect water quality and may also require a site erosion and sediment control plan, disturbed area

stabilization plan, and/or nitrogen management plan, depending on size and site characteristics of the operation.

Significance Level: Less than Significant Impact

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Comment:
The project is located on previously disturbed land formerly utilized as a rock quarry, which is composed of crushed rock. The site does not contain any onsite watercourses. Additionally, during project construction, silt fencing and straw waddles would be installed around all construction areas, and straw would be spread on all disturbed surfaces, which would reduce any potential runoff during construction.

Existing site elevations and topography would remain largely unchanged after project construction, and overall drainage patterns would remain essentially the same. New development would occur only within the former quarry footprint. The project would collect and store rainwater from the roof of the new greenhouse/indoor cultivation building, and would construct a bioswale to capture overland runoff within the fenced area around the building. New hardscape would be installed for the paved driveway; other access roads would be improved gravel or dirt. The project would be subject to a grading permit, which requires that all new runoff from new impervious surfaces be contained and treated onsite. Because overall drainage patterns would not change, the project would not result in substantial new surface runoff or flooding on- or off-site, either during construction or post-construction and the flooding impact would be less than significant.

Significance Level: Less than Significant Impact

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Comment:
Permit Sonoma Grading and Stormwater Section staff reviewed the project referral on February 24, 2021 and provided conditions of approval to ensure project compliance with the County Construction Grading and Drainage Ordinance (Zoning Code Chapter 11) and the Storm Water Quality Ordinance (Zoning Code Chapter 11A). The project would require a grading permit, which would not be issued until all recommended feasible stormwater treatment options have been incorporated into project design in compliance with all applicable standards of the County Code which would ensure that runoff water would not exceed drainage capacity or substantially add to polluted runoff.

Significance Level: Less than Significant Impact

iv. Impede or redirect flood flows?

Comment:
There are no blue line streams on the project site and the parcel is not in the 100-year flood zone or

Special Flood Hazard Area (SFHA)[19] (i.e., the area that would be inundated by the flood event has a one percent chance of being equaled or exceeded in any given year). Refer to responses 10.c.ii and 10.c.iii above for discussion of hydrological impacts.

Significance Level: Less than Significant Impact

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Comment:
According to Sonoma General Plan Figure PS-1f[20], the project site is not located in an area that would be subject to flooding as a result of levee or dam failure. The project site is not located in a tsunami or seiche zone.

Significance Level: No Impact

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Comment:
Though the County does not have a comprehensive water quality control plan, it achieves water quality control through enforcement of relevant requirements written into the General Plan and County Code. The project would be required to comply with all applicable water quality control requirements, including those related to cannabis cultivation, construction activities, wastewater discharge, and stormwater runoff.

The project site is not located in a priority groundwater basin as defined under the Sustainable Groundwater Management Act (SGMA). The nearest SGMA basin is the Santa Rosa Valley-Santa Rosa Plain Medium Priority Groundwater Basin, nearest boundary of which is located proximately 3 miles east of the project site. Though the project would not be subject to a sustainable groundwater plan, compliance with the County requirements discussed above in this section would protect against groundwater depletion or use of groundwater in an unsustainable manner.

The project would not conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan.

Significance Level: Less than Significant Impact

11. LAND USE AND PLANNING:

Would the Project:

[19] Sonoma County. General Plan 2020 Public Safety Element. "Flood Hazard Areas Fig. PS-1e," https://permitsonoma.org/longrangeplans/adoptedlong-rangeplans/generalplan/organizationandoverview/publicsafety/publicsafetymaps/publicsafetyfloodhazardareas, accessed March 29, 2023.

[20] Sonoma County. General Plan 2020 Safety Element. "Dam Failure Inundation Hazard Areas, Figure PS-1f," https://permitsonoma.org/longrangeplans/adoptedlong-rangeplans/generalplan/organizationandoverview/publicsafety/publicsafetymaps/publicsafetydamfailureinundationhazardareas, accessed March 29, 2023.

a) Physically divide an established community?

Comment:
The project would not physically divide the community. It does not involve the construction of a large physical structure (such as a major transportation facility) or removal of a primary access route (such as a road or bridge) that could impair mobility within an established community or between a community and outlying areas. All improvements associated with the buildout of the project would be constructed within the boundaries of the project site. The project does not include or propose expansion beyond the parcel boundaries nor does the project include changes to the existing roadway layout.

Significance Level: No Impact

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Comment:
The project would not conflict with any applicable land use plan adopted for the purpose of avoiding or mitigating environmental effects, including the Sonoma County General Plan and Zoning Ordinance, or the Petaluma Dairy Belt Area Plan. The General Plan Land Use and zoning designation on the parcel is Land Intensive Agriculture. The Petaluma Dairy Belt Area Plan land use designation for the parcel is also Land Extensive Agriculture. This land use designation is intended to enhance and protect lands capable of and generally used for animal husbandry and the production of food, fiber, and plant materials in areas where soil and climate conditions typically result in relatively low production per acre of land. Agricultural Resource policies focus on establishing and maintaining parcel sizes that are conducive to continued agricultural production and restricting non-agricultural uses to those that are compatible with agriculture.

The proposed project would also be generally consistent with goals, policies, and objectives in the Sonoma County General Plan 2020 related to avoiding or mitigating an environmental effect, including:

- Protection against intensive development of lands constrained by natural hazards and proliferation of growth in areas where there are inadequate public services and infrastructure (General Plan Land Use Element 2.7- Natural Resource Land Use Policy): The project site is not constrained by steep slopes, biotic or scenic areas, poor soils or water, geologic hazards, or fire and flood-prone areas. Development on the site is limited to less than 2 acres of the 113-acre parcel and no new public services or infrastructure are needed to serve the project.

- The project is designed in harmony with the natural and scenic qualities of the local area (Policy LU-12g), as the project would be setback at least 100-feet from the property line, screened by proposed landscaping, and structures will be agricultural and nature and subject to design review.

- Preservation of biotic and scenic resources (General Plan Goal LU-10, Objective LU-10.1, Goal OSRC-2, Objective OSRC-2.1, Objective OSRC-2.2, Objective OSRC-2.3, Policy OSC-2d,

Goal OSCR-3, Policy OSRC-3a, Policy OSRC-3b, Policy OSRC-3c, Goal OSRC-6, Objective OSRC-6.1, and Policy OSRC-6a): The project would be consistent with regulations pertaining to avoiding biotic resources and would also be consistent with regulations designed to maintain the scenic qualities of the area. (See Section 1, Aesthetics, for further discussion).

- Wastewater (General Plan Policy LU0-8a): The project would comply with regional waste discharge requirements and County regulations to minimize stormwater, surface water, and groundwater pollution.

- Maintaining very low residential densities (General Plan Objective LU-12.6): The project does not propose to increase residential density or construct new residences.

- Nighttime lighting and preservation of nighttime skies and visual character of rural areas (General Plan Goal OSRC-4, Objective OSRC-4.1, Objective OSRC-4.2, Policy OSRC-4a, Policy OSRC-4b, and Policy OSRC-4c): The project would use minimal, motion-activated exterior lights and all night lighting from mixed light greenhouse will be contained withing the structures, which would comply with County requirements related to location, shielding, and light levels.

- Renewable Energy (General Plan Policy LU-11b, Goal OSRC-14, and Objective OSRC-14.2): The project would use 100 percent renewable. This is consistent with the County's goals to conserve energy and improve efficiency.

- Protection of Water Resources (General Plan Goal LU-8, Objective LU-8.1, Goal, Policy LU-8a): The project would be consistent with regulations pertaining to protecting Sonoma County’s water resources and would be consistent with regulations designed to avoid long-term declines in available groundwater resources or water quality.

- Noise (General Plan Goal NE-1): Project construction and operations, including cannabis cultivation and processing, would not exceed the general plan noise standards Table NE-2 (See Section 12, Noise, for further discussion).

Within the Land Extensive Agriculture land use and zoning designation, commercial cannabis operations including centralized processing and cultivation (up to one acre of cultivation area) operations are allowed land uses with a use permit. The proposed project would be consistent with the County Code for the LEA zoning designation as well as the Development Criteria and Operating Standards from the Code intended to avoid and minimize potential environmental impacts (Section 26-88-250 through 254).

The primary use of any parcel within one of the three agricultural land use categories (LIA, LEA, DA) must involve agricultural production and related processing, support services, and visitor serving uses. Allowed non-agricultural land uses must be conducive to continued agricultural production. The parcel maintains a horse training facility, an organic vegetable farming operation, bee keeping, and sheep grazing, which will continue on the project parcel. A condition of approval will require that onsite agricultural uses (or other comparable agricultural use) be continued as long as the permit is active.

No conflicts with other general plan or area plan policies related to scenic, cultural, or biotic

resource protection, noise, or transportation have been identified. No conflicts with the Development Criteria or Operating Standards have been identified and no exceptions or reductions to standards would be necessary. Therefore, the project would not conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Significance Level: Less than Significant Impact

12. MINERAL RESOURCES:

Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Comment:
Although the project site was used as a rock quarry in the past, it is not located within a designated mineral resource deposit area.[21] Sonoma County has adopted an Aggregate Resources Management Plan that identifies aggregate resources of statewide or regional significance (areas classified as MRZ-2 by the State Geologist).

The project site does not contain any active mines or known mineral resources that would require preservation and/or be impacted by the project.

Significance Level: No Impact

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

Comment:
The project site is not zoned MR (Mineral Resources) and is not located within a locally-important mineral resource recovery site. No locally-important mineral resources are known to occur at the site.

Significance Level: No Impact

13. NOISE:

Would the project result in:

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Comment:

[21] Sonoma County. "Aggregate Resources Management Plan," Available at: https://permitsonoma.org/longrangeplans/adoptedlong-rangeplans/aggregateresourcemanagement, accessed March 29, 2023.

Noise may be defined as loud, unpleasant, or unwanted sounds. The frequency (pitch), amplitude (intensity or loudness), and duration of noise all contribute to the effect on a listener or receptor, and whether the receptor perceives the noise as objectionable, disturbing, or annoying. The decibel scale (dB) is a unit of measurement that indicates the relative amplitude of a sound. Sound levels in dB are calculated on a logarithmic basis. An increase of 10 dB represents a tenfold increase in acoustic energy, while 20 dBs is 100 times more intense, 30 dBs is 1,000 more intense, and so on. In general, there is a relationship between the subjective noisiness, or loudness of a sound, and its amplitude, or intensity, with each 10 dB increase in sound level perceived as approximately a doubling of loudness. There are several methods of characterizing sound. The most common method is the "A-weighted sound level," or dBA. This scale gives greater weight to the frequencies of sound to which the human ear is typically most sensitive. Thus, most environmental measurements are reported in dBA, meaning decibels on the A-scale.

The energy contained in a sound pressure wave dissipates and is absorbed by the surrounding environment as the sound wave spreads out and travels away from the noise generating source. Theoretically, the sound level of a point source attenuates, or decreases, by 6dB with each doubling of distance from a point, or stationary, source of a sound, and 3 dB for each doubling of distance from a mobile source of the sound. Sound levels are also affected by certain environmental factors, such as ground cover (asphalt vs. grass or trees), atmospheric absorption, and attenuation by barriers. When more than one-point source contributes to the sound pressure level at a receiver point, the overall sound level is determined by combining the contributions of each source. Decibels, however, are logarithmic units and cannot be directly added or subtracted together. Under the dB scale, a doubling of sound energy corresponds to a 3 dB increase in noise levels. For example, if one noise source produces a sound power level of 70 dB, two of the same sources would not produce 140 dB – rather, they would combine to produce 73dB.

County noise standards for non-transportation operational noise (as indicated in Table NE-2 of the General Plan) establish a maximum allowable exterior noise exposure of 50 dBA in the daytime (7:00 AM to 10:00 PM) and 45 dBA in the nighttime (10:00 PM to 7:00 AM), as measured using the L50 value (the value exceeded 50 percent of the time, or 30 minutes in any hour – i.e., the median noise level).

Table 5. Maximum Allowable Exterior Noise Exposures for Non-transportation Noise Sources (Table NE-2 from General Plan)

Hourly Noise Metric[1] (dBA)	Daytime (7 a.m. to 10 p.m.)	Nighttime (10 p.m. to 7 a.m.)
L50 (30 minutes in any hour)	50	45
L25 (15 minutes in any hour)	55	50
L08 (5 minutes in any hour)	60	55
L02 (1 minute in any hour)	65	60
[1]The sound level exceeding n% of the time in any hour. For example, the L50 is the value exceeded 50% of the time or 30 minutes in any hour; this is the median noise level.		

Potential sources of noise associated with cannabis operations can include emergency generators, HVAC equipment such as fans circulation, ventilation, exhaust, etc., blowers and heaters, and alarms (on equipment such as forklifts). County Code Section 26-88-254(g)(6) includes the following standard pertaining to cannabis: "Cultivation operations shall not exceed the General Plan Noise Standards table NE-2, measured in accordance with the Sonoma County Noise Guidelines." In addition, the Code includes a provision that "the use of generators as a primary source of power

shall be prohibited."

Traffic. Transportation noise would be generated by employee vehicles (19 total employees) as well as deliveries to the project site. Most employees would work during daytime hours and deliveries would occur between the hours of 8:00 am to 5:00 pm. Bloomfield Road is a Minor Collector Road as designated by Sonoma Public Infrastructure with an average daily traffic volume of 547 vehicles per day.[22] The function of collector roads is to gather traffic from Local Roads and funnel them to the Arterial Network. Generally, Minor Collector routes are shorter in length, have higher connecting driveway densities, have lower speed limits, are spaced at lower intervals, have lower annual average traffic volumes, and may have fewer travel lanes than their Major Collector counterparts.

The parcels in the immediate vicinity of the project parcel are generally large, ranging in size from approximately 30 to 200 acres. Directly across the road from the project parcel, there is one smaller parcel that is about 1.5 acres in size. These parcels are primarily used for agricultural operations. Some are developed with primary residences in addition to accessory structures such as barns and other outbuildings. There are four residences within an approximately 1,000-foot radius of the project site. Given the low number of vehicle trips and the project site's location off of Bloomfield Road, transportation noise would not be likely to result in a significant contribution to the existing ambient traffic noise level in the area.

Short-Term (Temporary) Noise. Construction noise would be temporary and short term as the impact would cease upon completion of construction. While residents could experience temporary noise from construction equipment and transport of construction materials, construction would be conducted within the allowable hours of 8:00 am and 5:00 pm. Extreme noise generating construction methods, such as impact pile driving, are not proposed. The nearest offsite residence is approximately 330-feet west of the proposed project site, there are two residences approximately 1,200-feet north, and one approximately 1,200-feet to the southwest all across Bloomfield Road. Due to the temporary short term nature of construction noise and distance to nearby receptors no significant impacts are anticipated for short term temporary noise.

Long-Term (Operational) Noise. Project operations would not require any heavy equipment or machinery. A permanently installed generator would be utilized only when there are power outages. The primary noise source that would be audible outside the proposed structures would be from fans required for ventilation. All HVAC equipment and the emergency generator would be located in the rear of all proposed structures, as delineated in the site plan (Figure 3) and contained within an acoustic enclosure either provided by the manufacturer or solid walls constructed of brick, masonry, or other robust materials. Further sound attenuation would be achieved via the landscaping in front of the proposed operation along the property line. The nearest offsite residence would be located over 400-feet across the road from the proposed location of exterior HVAC equipment and the emergency generator. Mitigation Measure Noise 1 requiring acoustical enclosures for HVAC equipment and Emergency Generators will reduce noise impacts to sensitive receptors to a less than significant level.

Significance Level: Less than Significant Impact with mitigation incorporated.

[22] Sonoma County Interactive GIS Map Website: Sonoma County GIS Mapping Portal URL: https://sonomacounty.maps.arcgis.com/apps/webappviewer/index.html?id=82e364c2c425408e8bedb308afe5da22 Accessed: February 21, 2023.

Mitigation:

Mitigation Measure NOISE-1 HVAC and Emergency Generator Sound Enclosures: HVAC and Generator noise emissions shall be less than 70 decibels as measured at any point 25 feet from the unit(s) when operating (this typically can be obtained with a Level II acoustic enclosure from the equipment manufacturer). The applicant shall submit sound level specification sheet(s) for HVAC and generator equipment and for any accompanying acoustic enclosures, if applicable, to demonstrate compliance with this noise limit. A separate structure (e.g., a sound wall) may also be constructed to meet this standard; if construction of a separate structure is proposed, the applicant shall also submit documentation prepared by a qualified noise consultant that the structure will attenuate the noise level in compliance with this noise limit.

Mitigation Monitoring NOISE-1 HVAC and Emergency Generator Sound Enclosures: Permit Sonoma staff shall verify that all required acoustic enclosures or sound walls are in place prior to issuance of a Use Permit Certificate to Operate the use. Verification shall include photographic documentation and/or a site visit, at the discretion of Permit Sonoma staff.

b) Generation of excessive groundborne vibration or noise levels?

Comment:

The project would include construction activities that may generate minor ground borne vibration and noise from conventional construction equipment, but no intensive vibratory noise would occur, such as pile-driving or jackhammering. All construction noise would be short-term, temporary, and limited to daytime hours. There are no other activities or uses associated with the project that would expose persons to or generate excessive ground borne vibration or ground borne noise levels.

Significance Level: Less than Significant Impact

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Comment:

The site is not within an Airport Referral Area as designated by the Sonoma County Comprehensive Airport Land Use Plan. The closest public use airports Sonoma County Airport, which is greater than 10 miles northeast of the project site.

Significance Level: No Impact

14. POPULATION AND HOUSING:

Would the project:

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Comment:

The proposed project does not include the construction of new housing, nor would it generate significant new demand for housing in the area (a maximum of 19 employees, including full-time and part-time staff, is proposed). This increase in employment opportunities is not anticipated to result in an indirect increase in population as it is anticipated that employees would be existing residents of the area. Therefore, the project would not induce substantial population growth in the area.

Significance Level: Less than Significant Impact

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Comment:
No existing people or housing would be displaced by the project and no replacement housing is proposed to be constructed.

Significance Level: No Impact

15. PUBLIC SERVICES:

Would the project:

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service rations, response times or other performance objectives for any of the public services:

Comment:
Construction of the project would not involve substantial adverse physical impacts associated with provision of public facilities or services. The proposed project does not propose new housing, nor would it generate significant new demand for housing in the area (a maximum of 19 employees are proposed). This small increase in employment opportunities is not anticipated to result in an indirect increase in population requiring construction of new or altered government facilities. Therefore, the project would not necessitate or facilitate construction of new public facilities.

Significance Level: No Impact

i. Fire protection?

Comment:
The project is located within the State Responsibility Area (SRA), under CalFire jurisdiction. The parcel is located in the Gold Ridge Fire Protection District. The nearest fire station to the site is the Bloomfield Volunteer Fire Department which is 3 minutes (1.9 miles) from the project site.

Sonoma County Fire Prevention reviewed the project description and plans on February 15, 2021, and required that the project include fire protection methods such as alarm systems, extinguishers, vegetation management, hazardous materials management, and management of flammable or

combustible liquids and gases. These are standard conditions of approval required by the County Code. Because none of the conditions or requirements requires the construction of new or expanded fire protection or emergency medical facilities, project impacts on fire protection and emergency medical services would be less than significant.

Significance Level: Less than Significant Impact

ii. Police?

Comment:
The Sonoma County Sheriff would continue to serve this area. There would be no increased need for police protection resulting from the project.

The proposed project does not include the development of housing. The project would generate up to 19 jobs as part of the operation. The project would not include the construction of a substantial number of homes or businesses or an amount of infrastructure and therefore would not induce substantial population growth. Existing police protection facilities would be adequate to serve the proposed project.

Significance Level: Less than Significant Impact

iii. Schools?

Comment:
Development fees to offset potential impacts on public services, including school impact mitigation fees, are required by Sonoma County Code and state law for new subdivisions and residential developments. The project does not include residential development and no new schools are reasonably foreseeable as a result. The project would not contribute to an increase in the need for expanded or additional schools.

Significance Level: No Impact

iv. Parks?

Comment:
The proposed project does not include the development of residential uses and thus would not result in the need for new or expanded park facilities.

Significance Level: No Impact

v. Other public facilities?

Comment:
The project would not be served by public sewer or water facilities. Expansion or construction of additional types of public facilities is not anticipated as a result of this project.

Significance Level: No Impact

16. RECREATION:

Would the project:

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Comment:
The proposed project would not involve activities that would cause or accelerate substantial physical deterioration of parks or recreational facilities. The proposed project does not include any residential use and as such would not lead to an increase in the use of existing neighborhood or regional parks or other recreational facilities.

Significance Level: No Impact

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Comment:
The proposed project does not involve or require the construction of recreational facilities. The proposed project does not involve the construction of new housing, which is the typical type of development that requires expansion of recreational facilities. No impact would occur.

Significance Level: No Impact

17. TRANSPORTATION:

Would the project:

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Comment:

The maximum number of employee generated daily trips is 57 (if all 19 employees were to travel to the site in a day); delivery/vendor truck trips are estimated at 217 truck trips per year (approximately four truck trips per week or less than one trip per day). Therefore, the total average daily trips estimated for the project would conservatively round up to 58, well below the OPR threshold of 110 trips per day.

Access to the project site would be from Bloomfield Road, which is a County-Maintained Road classified as a Minor Collector, nearby connecting roads include Valley Ford Road which is a Major Collector, and Burnside Road which is a Local Road according to the County Maintained Road System Map.[23] According to the most recent traffic volume data Average Daily Traffic volume is calculated to be 547 vehicles per day on Bloomfield Road, 4,606 vehicles per day on Valley Ford

[23] Sonoma County. 2020. General Plan Road Inventory, "County Maintained Road Postmile System Map." County-Maintained Road System (arcgis.com), accessed February 21, 2023.

Road, and 337 vehicles on Burnside Road.[24] Given the minimal number of average daily trips that would be generated by the project and the existing volumes of vehicles on local roadways, the project would have a less than significant impact on the traffic circulation system.

The area is not served by public transit. The closest public transit stop is served by Sonoma County Transit at the intersection of Highway 116, Hessel, and Blank Road, approximately 4.5 miles from the project site. The project is also located in a rural area with no designated bikeways, sidewalks, or other bicycle or pedestrian facilities. Therefore, the project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities.

Significance Level: Less than Significant Impact

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Comment:
Traffic impacts under CEQA have traditionally been assessed based on increases in intersection delays measured by Level of Service (LOS). However, with the passage of SB 743, transportation impacts under CEQA are now assessed based on the vehicle miles traveled (VMT) generated by a project (effective July 1, 2020).

Sonoma County has not yet adopted a VMT standard, nor has the County adopted a policy or threshold of significance regarding VMT. The Governor's Office of Planning and Research (OPR) has issued a "Technical Advisory on Evaluating Transportation Impacts in CEQA" (2018) to determine if the project's VMT may or may not cause a significant transportation impact. The screening threshold for small projects indicates projects that generate or attract fewer than 110 trips per day would result in a less than significant transportation impact.

The Cannabis Trip Generation form completed by the applicant on February 16, 2021, stated the project could generate a maximum of 58 trips per day (assuming all 19 employees were working onsite at the same time and if one of the four weekly delivery trips also happened on that day), which is below the threshold, indicating a less than significant impact.

Significance Level: Less than Significant Impact

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Comment:
The project would not increase hazards because it would not change the existing alignment of the roadway.

Significance Level: No Impact

d) Result in inadequate emergency access?

[24] Sonoma County Department of Transportation & Public Works. 2020. County Roads Functional Classification Map. Accessed Functional Classification (arcgis.com), accessed February 21, 2023.

Comment:
Emergency vehicle access would be provided directly via Bloomfield Road, which is a County-maintained two-lane roadway at least 20-feet wide. The project site will contain two locked, gated entrances, which will be designed to be at least 2-feet wider than the lane serving the gate and the gate will be located at least 30-feet from the roadway to allow an emergency vehicle to stop without obstructing traffic. Both entrances will be equipped with Knox Boxes to allow emergency responders full access whenever needed. The project site will contain a fire truck turnaround central to the project site. Additionally, project plans would require review by the Sonoma County Fire Prevention Division during the building permit process to ensure compliance with emergency access issues.

The project site is accessible via existing gates off of Bloomfield Road. Employee parking would be provided near the front of the parcel and in front of the proposed indoor cultivation and processing structures, less than 50-feet from the entrances to the site. State Fire Safe Regulations (14 CCR 1270.00 et seq.) provide road standards to ensure concurrent civilian evacuation and access for emergency wildfire equipment. Access to the site via Bloomfield Road complies with State Fire Safe Regulations, including improvements required in conditions of approval. The driveways from each gated entrance will be at least 20-feet wide and are relatively flat throughout, a fire safe turnround will be constructed central to the operation. Conditions of approval require that the project be designed to meet State Fire Safe Regulations.

Due to the low number of employees, Fire Safe Regulations-compliant emergency access via Bloomfield Road, and internal access design, there would be adequate emergency access to the project and the impact would be less than significant.

Significance Level: Less than Significant Impact

18. TRIBAL CULTURAL RESOURCES:

Would the project:

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code section5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Comment:

California Native American tribes were notified according to Public Resources Code section

21080.3.1 on February 2, 2021. The request for consultation period ended on March 4, 2021, with no Native American tribes requesting consultation for the project. No Tribe requested further information and no Tribe requested formal consultation.

The entire project site was operated as a quarry and decommissioned prior to 1980 resulting in removal of all native soils. Due to the fact that there are no remaining native soils no impacts are anticipated. Although no impacts are anticipated the County standard "Accidental Discovery" Condition of Approval applies to previously undiscovered TCR's or unique archaeological resources that may be accidentally encountered during project implementation.

Significance Level: Less than Significant Impact

19. UTILITIES AND SERVICE SYSTEMS:

Would the project:

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electrical power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Comment:
Domestic wastewater disposal would be provided via a new onsite septic system and potable water would be provided by an existing private well. A rainwater harvesting system and greywater system would also be constructed to supplement irrigation. The project would require connecting new structures to the electrical grid. Operation of the proposed project would increase energy usage relative to existing conditions in Sonoma County. The project is designed to reduce its energy consumption as much as possible by utilizing high-efficiency LED lighting for both artificial cultivation lighting and standard building lighting, as well as the installation of high-efficiency insulation for all indoor structures. The project will not utilize natural gas and there are no natural gas facilities in the area.

The proposed project would not require or result in construction of new public roads, sidewalks, or storm water drainage facilities. A rainwater harvesting system would be installed to capture up to 275,101 gallons of water annually from the roofs of all proposed structures. Grading and Stormwater Section staff reviewed the project referral and provided conditions of approval to comply with the County Construction Grading and Drainage Ordinance (Zoning Code Chapter 11) and the Storm Water Quality Ordinance (Zoning Code Chapter 11A). The project would require a grading permit, which would not be issued until all recommended feasible stormwater treatment options have been incorporated in compliance with all applicable standards of the County Code.

Significance Level: Less than Significant Impact

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Comment:
As discussed throughout Section 10 Hydrology and Water Quality, the project would use water from existing onsite wells in addition to a rainwater catchment and greywater system for project operations. The project is located within a Class 2 Groundwater Area. A County-required

hydrogeologic report determined that the existing well would provide enough water to sufficiently serve the project and that the project is unlikely to cause a decline in groundwater elevations or deplete groundwater resources over time. Domestic water uses from the existing on-site well would be negligible.

The quantity of groundwater to be used for the Project and within the Cumulative Impact Area compared to the quantity of available groundwater based on average rainfall conditions indicates that pumping for the Project is unlikely to result in significant declines in groundwater resources over time. Based on further analysis provided in the Hydrogeologic Assessment, even under drought conditions, project operations would constitute less than two percent of the water demand within the designated Cumulative Impact Area in a typical drought year.

Significance Level: Less than Significant Impact

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Comment:
The project site would be served by a new septic system installed and serviced by a licensed septic system contractor. The project would be required to obtain permits for a process wastewater disposal system and a separate domestic sewage disposal system. The system would require design by a registered civil engineer or registered environmental health specialist. Soils analysis, percolation, and wet weather testing may be required to ensure the sewage system is properly sited and the sewage system would meet peak flow discharge from all sources granted in the use permit. Further, the project is required to apply for annual wastewater discharge requirements with the North Coast Water Quality Control Board. The proposed project would not be served by public wastewater and would not impact the capacity of public facilities.

Significance Level: No Impact

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Comment:
Sonoma County has a solid waste management program in place that provides solid waste collection and disposal services for the entire County. The program can accommodate the permitted collection and disposal of the solid waste that would result from the proposed project.

Additionally, the project would be required to comply with the following operating standard for commercial cannabis cultivation facilities contained in County Zoning Code Section 26-88-254(g)(8):

A waste management plan addressing the storing, handling, and disposing of all waste by-products of the cultivation and processing activities in compliance with the best management practices issued by the agricultural commissioner shall be submitted for review and approval by the agency having jurisdiction. The plan shall characterize the volumes and types of waste generated, and the operational measures that are proposed to manage and dispose, or reuse the wastes in compliance with best management practices and county standards. All garbage and refuse on the site shall be accumulated or stored in non-absorbent, water-tight, vector resistant,

durable, easily cleanable, galvanized metal or heavy plastic containers with tight fitting lids. No refuse container shall be filled beyond the capacity to completely close the lid. All garbage and refuse on the site shall not be accumulated or stored for more than seven (7) calendar days, and shall be properly disposed of before the end of the seventh day in a manner prescribed by the solid waste local enforcement agency. All waste, including but not limited to refuse, garbage, green waste and recyclables, must be disposed of in accordance with local and state codes, laws and regulations. All waste generated from cannabis operations must be properly stored and secured to prevent access from the public.

The project proposes evaluating and re-using materials that might ordinarily be disposed of or recycled (e.g. cardboard, metals, etcetera) to reduce solid waste. The project is conditioned so that the applicant must provide a cannabis solid waste management plan detailing the disposal of cannabis waste for destruction, as well as a standard solid waste program covering all other types of waste. All cannabis waste shall be ground, chipped or shredded as necessary and mixed with suitable materials and composted until it is no longer recognizable as cannabis by sight or smell. Waste containing cannabis must be made unusable and unrecognizable prior to leaving the licensed premises by grinding and incorporating the cannabis waste with non-consumable, solid wastes listed below, such that the resulting mixture is at least 50 percent non-cannabis waste: a. Paper waste; b. Cardboard waste; c. Food waste; or other compostable oil waste; and other wastes approved by the County that would render the cannabis waste unusable and unrecognizable.

The conditions described herein support and are consistent with California Department of Cannabis Control (DCC) Sections 8102(s), 8305 & 8306 regarding Utility and Service Systems.

Significance Level: Less than Significant Impact

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Comment:
No applicable federal solid waste regulations would apply to the project. At the State level, the Integrated Waste Management Act mandates a reduction of waste being disposed and establishes an integrated framework for program implementation, solid waste planning, and solid waste facility and landfill compliance. Sonoma County has access to adequate permitted landfill capacity and reduction, reuse, and recycling programs to serve the proposed project. Construction and operational waste generated as a result of the project would require management and disposal in accordance with local and state regulations. The project would not conflict with or impede implementation of such programs.

Significance Level: Less than Significant Impact

20. WILDFIRE:

According to the Sonoma GIS tool, the proposed project and surrounding area is located in a State Responsibility Area, with a Fire Hazard Severity Zone (FHSZ) designated as Moderate[25]. As noted in

[25] Sonoma County. 2020. Permit Sonoma GIS, Cannabis Site Evaluation.

the General Plan Public Safety Element (p. PS-14): *the Moderate Fire Hazard Severity Zone includes: a) wildland areas of low fire frequency supporting modest fire behavior; and b) developed/urbanized areas with a very high density of non-burnable surfaces and low vegetation cover that is highly fragmented and low in flammability.*

If located in or near state responsibility areas or lands classified as very high fire severity zones, would the project:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

Comment:
The project would not impair implementation of an adopted emergency response plan. There is no adopted emergency evacuation plan for the County, and the project would not change existing circulation patterns or effect emergency response routes. Project development plans would be required to be reviewed by a Fire Prevention Fire Inspector during the building permit process to ensure adequate emergency access is provided to the site.

Significance Level: Less than Significant Impact

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Comment:
Wildfire risk is dependent upon existing environmental conditions, including but not limited to the amount of vegetation present, topography, and climate. The site is located in western Sonoma County composed of gently sloping hills and flat areas. Vegetation consists predominantly of pastureland grasses and scattered riparian vegetation near water courses. There is no significant forested or chaparral wildland vegetation, which carries wildfire, in the vicinity. Climate in the area is characterized as Mediterranean, with cool wet winters and hot dry summers.

According to the Wildland Fire Hazard Area Map (Figure PS-1g) in the Sonoma County General Plan, the project site is located in the State Responsibility Area and within a Fire Hazard Severity Zone designated as Moderate, and is not within a Wildland Urban Interface. Projects located in High and Very High Fire Severity Zones are required by state and county code to have a detailed vegetation management plan developed and reviewed by the Sonoma County Fire Prevention Division before a building permit can be issued. This requirement does not apply to projects such as this one located in a Moderate Zone. However, all construction projects must comply with County Fire Code (Chapter 13) and Fire Safe Regulations, including but not limited to, installing fire sprinklers in buildings, providing emergency vehicle access, and maintaining a dedicated fire-fighting water supply on-site. Construction and operation at the site must conform with adopted State standards as determined and implemented by CALFIRE and Sonoma County Fire officials intended to reduce the risk of wildfire to less than significant.

There are no existing residences on the project parcel. No more than 19 employees would be on site at any given time. Therefore, the project would have a less than significant impact regarding exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of

https://sonomacounty.maps.arcgis.com/apps/webappviewer/index.html?id=0b784d90045941798d780f288b6f7003, Accessed February 23, 2023.

a wildfire.

Significance Level: Less than Significant Impact

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Comment:
According to the Sonoma GIS tool the proposed project is located in a State Responsibility Area, with a Fire Hazard Severity Zone (FHSZ) designated as Moderate. Operation of the proposed project would require maintenance of associated infrastructure; however, it would not exacerbate fire risk or result in temporary or ongoing impacts on the environment. Ongoing vegetation maintenance of the property to reduce wildfire risk would occur throughout the year. As discussed in Sections 10.a and 20.b, the project includes a Fire Prevention Plan that includes reduction of fuel loads, turnaround space, vegetation management, and fire break maintenance. Due to these requirements, the installation or maintenance of associated infrastructure would not exacerbate fire risk or result in temporary or ongoing impacts on the environment.

Significance Level: Less than Significant Impact

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes?

Comment:
The project site is not located in an area at high risk for flooding, such as a 100-year flood hazard area. Additionally, drainage patterns at the project site would remain essentially the same as under existing conditions.

The project site is located on gently sloping ground surfaces and is not located within a deep seated landslide area, or on a mapped landslide complex or debris flow source area. It is unlikely that a landslide would occur on-site as a result of runoff, post-fire slope instability, or drainage changes. Therefore, it is not anticipated that the project would expose people or structures to significant risks including flooding or landslides as a result of runoff, post fire instability, or drainage changes

Significance Level: Less than Significant Impact

21. MANDATORY FINDINGS OF SIGNIFICANCE:

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Potential project impacts on special status plant and fish/wildlife species and habitats are addressed in Section 4. With the implementation of the required mitigation measures BIO-1 through BIO-3, impacts to the habitat of a fish or wildlife species would be less than significant.

The project site is located within a former rock quarry decommissioned prior to 1980, then used as a staging area for farm equipment and vehicles, additionally the site was graded in 2019 in order to manage stormwater runoff. As discussed in Section 5, the NWIC stated the proposed project area has a low possibility of containing unrecorded archaeological sites, and therefore did not recommend a study. No requests for consultation were received from any Native American Tribes in response to the AB52 referral. The project is not expected to impact or eliminate important examples of major periods of California history or prehistory and no mitigations were proposed.

Significance Level: Less than Significant Impact

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Section 15355 of the CEQA Guidelines state: *Cumulative impacts refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts*. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. A search was undertaken to identify reasonably foreseeable projects in the vicinity of the proposed project area that might have over-lapping or cumulative impacts.

As discussed in Section VI. of the Initial Study, Other Related Projects, there are two other proposed cannabis operations within a two-mile radius of the project site, neither project is approved or currently operating. One project is located 1-mile to the southeast on Roblar Road, UPC17-0079, and proposes 43,560 square feet of outdoor cannabis cultivation and onsite processing in an existing barn. The second project is located 1.5-miles southwest off of Mill Street, UPC23-0001, and proposes 10,000 square feet of mixed light cultivation and 33,560 square feet of outdoor cultivation. There was previously a 10,000 square foot outdoor cannabis operation east of the project site permitted by the Sonoma County Department of Agriculture Weights and Measurements that expired in June 2022, and is currently registered to cultivate hemp.

The proposed project located off Mill Street may be accessed via Bloomfield Road or Valley Ford Road. That project currently proposes less than 10 employees (including full and part time staff) and estimates a maximum of 15 daily trips during peak activity periods (e.g., harvest) which would contribute an estimated 5 trips during peak morning and evening commute hours. Given the minimal number of peak hour trips that would be generated by both projects and the existing volumes of vehicles on local roadways, the projects would have a less than significant impact on level of service standards.

Project-related construction activities are relatively benign and would result in limited, minimal, and short-term impacts. Further, the relatively large average parcel size in the surrounding area reduces potential for cumulative aesthetic impacts related to additional construction or commercial activity that could occur in the area. Such future uses would be separated enough to diminish the visual impact of the overall viewshed from any particular location. Additionally, each operation is located over 1-mile from one another, and is either not visible from a scenic resource, or meets the required setback from a scenic resource.

As discussed in Section 10, Hydrology and Water Quality, the groundwater impacts considered demand and use within a cumulative impact area (CIA) within a 925-acre polygon with the project site in the approximate center. Groundwater from onsite wells in combination with a rainwater catchment and greywater recycling system will supply water for the project. The total cumulative impact area annual onsite water demand, excluding the project, was estimated to be 54.25 acre-feet (21.9% of non-drought year recharge, and 43.9% of drought year recharge), and potential future demand to be 72.68 acre-feet (29.4% of non-drought year recharge, and 58.8% of drought year recharge), which are both less than 1 percent of the total calculated aquifer storage capacity in the cumulative impact area. The study concluded that total annual water demand proposed for the site including cannabis, landscaping, gardens, and livestock use (~2 acre-feet/year) is sustainable based on current and future development and is not likely to create an overdraft condition at this time and would be sustainable for the foreseeable future, indicating that combined project contributions would not result in a cumulatively considerable impact.

The project would contribute to cumulative impacts related to air quality, biological resources, and greenhouse gas, and noise, but County standards, BMPs, and mitigations would ensure that the project's cumulative contributions would not be considerable.

Significance Level: Less than Significant

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Cannabis operations have the potential to cause substantial adverse impacts on human beings, both directly and indirectly. However, all potential impacts and adverse effects on human beings (resulting from air quality/odors, hazards, traffic) were analyzed and would be less than significant.

Significance Level: Less than Significant

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