MITIGATION MONITORING AND REPORTING PROGRAM

INTRODUCTION

CEQA and the State CEQA Guidelines (PRC Section 21081.6 and State CEQA Guidelines Sections 15091[d] and 15097) require public agencies "to adopt a reporting and monitoring program for changes to the project which it has adopted or made a condition of project approval to mitigate or avoid significant effects on the environment." A mitigation monitoring and reporting program (MMRP) is required for the Cannabis Program Update because the EIR identifies potential significant adverse impacts related to the project implementation, and mitigation measures have been identified and adopted to reduce those impacts. Adoption of the MMRP would occur along with approval of the amendments to the Sonoma County General Plan and amendments to Sonoma County Code for the Sonoma County Comprehensive Cannabis Program Update:

PURPOSE OF MITIGATION MONITORING AND REPORTING PROGRAM

This MMRP has been prepared to ensure that all adopted mitigation measures have been incorporated into the Cannabis Program Update and would be implemented during construction and operation of individual projects. The attached table has been prepared to assist the responsible parties in implementing the mitigation measures. The table identifies the impact, mitigation measures (as amended through the Final EIR), monitoring responsibility, mitigation timing, and provides space to confirm implementation of the mitigation measures. The numbering of mitigation measures follows the numbering sequence found in the EIR. Mitigation measures that are referenced more than once in the DEIR are not duplicated in the MMRP table.

The following adopted mitigation measures were incorporated into County Code:

- Mitigation Measure 3.1-1 (ZPC, DRH, UPC):[1] Implement Additional Measures to Protect Scenic Resources
- Mitigation Measure 3.3-4a: Implement Additional Measures to Minimize Odors from Cultivation and Handling of Harvested Cannabis
- Mitigation Measure 3.3-4b: Implement Additional Measures to Minimize Odors from Cannabis Smoking
- Mitigation Measure 3.4-2c (ZPC): Limit Removal of Trees to Outside of the Nesting Bird Season
- Mitigation Measure 3.4-6a (ZPC): Utilize Wildlife-Friendly Building and Fencing Designs
- Mitigation Measure 3.10-2b (ZPC): Implement Groundwater Monitoring
- Mitigation Measure 3.12-4a: Outdoor Amplified Live Music Requires a Use Permit at Storefront Retailers
- Mitigation Measure 3.15-1a (ZPC): Protection of Tribal Cultural Resources for Permitted Uses
- Mitigation Measure 3.16-1 (All Cannabis Uses): Municipal Water Supply Verification for New Cannabis Uses
- Mitigation Measure 3.17-1a (UPC, DRH, and ZPC): Limitation of Use Types in Very High Fire Hazard Severity Zones

REPORTING

The County shall document and describe the compliance of the activity with the adopted mitigation measures either within the attached table or a separate monitoring documentation as part of processing applications under the proposed ordinance.

[1] ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis.

MITIGATION MONITORING AND REPORTING PROGRAM TABLE

The categories identified in the attached MMRP table are described below.

- Mitigation Measure – This column provides the verbatim text of the adopted mitigation measure
- Implementation Responsibility – This column identifies the party responsible for implementing the mitigation measure.
- Timing – This column identifies the time frame in which the mitigation will be implemented.
- Verification – This column is to be dated and signed by the person (either project manager or his/her designee) responsible for verifying compliance with the requirements of the mitigation measure.
- Throughout the table, "Prior to operation" means post-approval, but before operation begins. Verification of compliance would occur through one or more of the following:
- For measures that apply only to a specific mitigation action (e.g., installing odor control equipment, which requires a building permit), a specific post-approval checkpoint is identified (e.g., prior to building permit final);
- For discretionary permits (UPC and DRH), all mitigation measures are incorporated into project conditions of approval, and those conditions must be verified prior to operation.
- A Use Permit Certificate is issued by the County following completion of all pre-operational conditions for a UPC.
- Formal signoff and authorization to operate is also provided by the County for DRH after completion of all pre-operational conditions.
- Pre-operational conditions can be verified at different stages, depending on the condition. For example, pre-disturbance surveys would be required prior to initial ground-disturbance and/or vegetation removal; building plans would be reviewed for compliance with light and glare standards prior to issuance of building permit(s) (and sometimes a second time prior to building permit final); installation of odor control filtration equipment would be reviewed on building plans prior to building permit issuance and given final signoff after building construction, prior to building permit final.

Mitigation Monitoring and Reporting Program

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
Aesthetics				
Impact 3.1-1: Have a Substantial Adverse Effect on a Scenic Vista or Viewshed **Impact 3.1-2: Damage Scenic Resources Including, but Not Limited to, Trees, Rock Outcroppings, and Historical Buildings within a State Scenic Highway or County-Designated Scenic Roadway** **Impact 3.1-3: Substantially Degrade the Existing Visual Character or Quality**	**Mitigation Measure 3.1-1 (ZPC, DRH, UPC): Implement Additional Measures to Protect Scenic Resources** The following mitigation measures would be included as new standards in proposed Section 26-18-115(C): ▶ If a hoop house is visible from a public vantage point, any covering must be non-reflective. ▶ Weed block materials shall be made of non-reflective and non-plastic materials. ▶ Installation of solid fencing, such as wood, masonry, and chain link covered with privacy cloth, is prohibited within County-designated scenic landscapes, scenic corridors, and community separators.	County to verify compliance County to verify compliance	Verify fencing and hoop house design and location compliance during the permit process and prior to approval of ZPC, UPC, DRH. Verify hoop house covering and weed block material compliance prior to operation for UPC or DRH, and during annual inspections for ZPC, UPC & DRH.	

Impact 3.1-4: Create a New Source of Substantial Light or Glare that Would Adversely Affect Day or Nighttime Views	**Mitigation Measure 3.1-4a (ZPC, UPC, DRH): Implement Mitigation Measure 3.1-1**
	
	Mitigation Measure 3.1-4b: (ZPC, UPC, DRH): Implement New Light and Glare Requirements
	The following mitigation measures would be imposed through the zoning permit, use permit, and design review with hearing processes:
	▶ A lighting plan must be submitted for new cannabis uses that are subject to a use permit or design review with hearing. The lighting plan must demonstrate compliance with the following standards.
	▶ Lighting Standards
	  ▪ All exterior lighting shall be "Dark-sky" compliant and fully shielded to avoid nighttime light pollution per guidance provided by the International Dark Sky Association (www.darksky.org).
	  ▪ Lighting shall be fully shielded to prevent nighttime light pollution.
	  ▪ Lighting shall be downward facing, located at the lowest possible point to the ground to prevent spill over onto adjacent properties,
		See above.
		
		Applicant to submit lighting plan
		
		County to verify compliance
			See above.
			
			Lighting plan required at time of application for UPC, DRH.
			
			Verify compliance with lighting and glare standards prior to issuance of grading or building permits for ZPC, UPC or DRH).	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	glare, nighttime light pollution and unnecessary glow in the night sky. ▪ Light fixtures shall not be located at the periphery of the property and shall not reflect off structures. Security lighting shall be put on motion sensors. ▪ Uplights are not permitted; flood lights are permitted only for temporary use in fields during harvest. ▪ Signs that emit light are prohibited and lights used to illuminate signs shall be shielded to prevent light spill beyond the sign and not exceed a total light output of 1000 lumens. ▪ Light fixtures emitting over 1000 lumens are prohibited except where needed for agriculture, commercial fishing, and first responders. ▪ Total illuminance created by artificial lighting, shall not exceed 1.0 lux at the property line. Color temperature of exterior light sources shall be 3000 Kelvin or lower. ▶ Glare Standards. ▪ All glass used on building exteriors must have a visible light reflectance of no more than 15%. ▪ Glass with a visible light reflectance greater than 10% must incorporate glare mitigation strategies, including but not limited to exterior shading devices or non-reflective coatings. ▪ Certification from the glass manufacturer verifying compliance with reflectance limits must be provided with the building permit application. ▪ Reflectance data and specifications for all exterior glass must be included in the permit documentation.			
Air Quality				
Impact 3.3-2: Generate Short-Term Construction-Related Emissions of ROG, NO_X, PM_{10}, and $PM_{2.5}$	**Mitigation Measure 3.3-2 (DRH and UPC): Implement the Bay Area Air Quality Management District's Basic Construction Mitigation Measures** The following mitigation measures would be implemented through the design review with hearing (DRH) or use permit for cannabis (UPC) process for individual projects.	County to verify compliance	Verify compliance prior to issuance of grading or building permits for UPC, DRH.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	Prior to the issuance of grading or building permits, Sonoma County shall ensure that BAAQMD's basic construction mitigation measures from Table 5-2 of the BAAQMD 2022 CEQA Guidelines (or subsequent updates) are noted on the construction documents. These basic construction mitigation measures include the following: 1) All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. 2) All haul trucks transporting soil, sand, or other loose material off-site shall be covered. 3) All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. 4) All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph). 5) All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. 6) All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph. 7) All trucks and equipment, including their tires, shall be washed off prior to leaving the site. 8) Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a 6- to 12-inch layer of compacted layer of wood chips, mulch, or gravel. 9) 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 County staff.	Construction Coordinator	Complaint responses and resolution ongoing during construction	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
Impact 3.3-4: Expose a Substantial Number of People to Odors Considered Objectionable	**Mitigation Measure 3.3-4a: Implement Additional Measures to Minimize Odors from Cultivation and Handling of Harvested Cannabis** Proposed Sections 26-18-115(C), 26-20-080, 26-20-025(C) shall be amended to include the following provision: • A structure containing cannabis must be equipped with a filtration and ventilation system to control odors, humidity, and mold, except for structures containing only prepackaged cannabis products. The air filtration system shall be sufficient to prevent internal odors from being emitted externally and must rely on activated carbon filtration, negative ion generation, ozone generation, or other odor control mechanisms demonstrated to achieve the same odor reductions so that odors are not detectable outside the structure.	County to verify compliance	Verify compliance prior to building permit final for ZPC, UPC & DRH.	
Impact 3.3-4: Expose a Substantial Number of People to Odors Considered Objectionable	**Mitigation Measure 3.3-4b: Implement Additional Measures to Minimize Odors from Cannabis Smoking** Proposed Sections 26-18-270, 26-22-120, and 26-26-025 shall be amended as follows: ▶ Designated outdoor smoking areas must be located at the furthest distance possible from offsite receptors. If a designated outdoor smoking area is within 600 feet from a property line, the site must employ odor control technology proven to reduce or control smoke and associated odors (e.g. vacuum ventilation or water misters). If smoking occurs indoors, the structure shall be equipped with an air filtration system sufficient to prevent internal odors from being emitted externally and shall rely on activated carbon filtration, negative ion generation, ozone generation, or other odor control mechanisms demonstrated to achieve the same odor reductions so that odors are not detectable outside the structure. Any facility where cannabis smoking occurs must also comply with the Sonoma County Health Ordinance related to employee protections.	County to verify compliance	Verify compliance prior to building permit final for UPC & DRH or prior to permit issuance for periodic special events (ZPE).	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
Biological Resources				
Impact 3.4-1: Result in Disturbance to or Loss of Special-Status Plant Species and Habitat	**Mitigation Measure 3.4-1a (DRH or UPC): Conduct Biotic Resource Assessment Consisting of Pre-Application Biological Surveys and Project-Level Analysis** Sonoma County shall require the following mitigation measures for cannabis project applications subject to a use permit or design review hearing. ▶ A biotic resource assessment must be prepared to determine the presence of biological resources within a project site. The biotic resource assessment will include a biological survey and project-level analysis, which shall be conducted by a qualified biologist. The survey area shall include the proposed disturbance area for the proposed cannabis premises and supporting improvements outside of the premises, including areas of anticipated construction, grading, other ground disturbance, or vegetation removal as well as staging areas, areas of anticipated light or noise impacts, ingress and egress routes, and utility routes. The survey area shall be large enough to encompass areas subject to both direct and indirect impacts. The qualified biologist shall assess the habitat suitability of the proposed disturbance area for all special-status plants, special-status wildlife, and sensitive habitats identified as having potential to occur in the County. This shall include an analysis of the late successional forest habitat present within the Program Area, if applicable (see "Late Successional Forest" under Section 3.4.2 above) to determine if there is old-growth habitat present within the proposed disturbance area (see Mature and Old-Growth Forests: Definition, Identification, and Initial Inventory on Lands Managed by the Forest Service and Bureau of Land Management, Appendix 1, Pacific Southwest Region [Region 5] [USFS 2023] to determine what qualifies as old-growth). The qualified biologist shall also assess the habitat suitability of the proposed disturbance area for all invasive species, as well as record locations of invasive species if they are observed during the survey. The biotic resource assessment must include sufficient evidence to support a conclusion as to whether special-status species and sensitive habitats are present or are likely to occur in the proposed	Applicant to submit Biotic Resource Assessment County to verify compliance	Biotic Resource Assessment required at time of application submittal Verify compliance during the permit process and prior to UPC or DRH approval.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	disturbance area. At a minimum, the biotic resource assessment report shall include: ▪ date, time, and weather conditions during the survey; ▪ a description and explanation of whether the site conditions are considered typical or atypical; ▪ a map depicting the proposed disturbance area and the unique, rare, and special-status species, sensitive habitats, or sensitive natural communities found; ▪ a vegetation map of the proposed disturbance area using the National Vegetation Classification System (e.g., *A Manual of California Vegetation*) and an associated table, including acreage of vegetation types that could be adversely affected by project implementation by also checking the Vital Lands Initiative priority arefor vegetation communities (Sonoma County Ag + Open Space 2024); ▪ a special-status species table generated from review of the CNDDB, the California Native Plant Society Inventory of Rare and Endangered Plants, lists maintained by USFWS, and the most recent, best-available range information for special-status species; ▪ a list of wildlife movement corridors present in the project area as well as footprint (i.e., area) of corridors, checking at least the following sources: Sonoma County General Plan (Habitat Connectivity Corridors), Sonoma County Ag + Open Space Vital Lands Initiative, and the Conservation Lands Network; ▪ a description of survey methods and any protocols utilized during the survey; ▪ a list of common and special-status species and habitats observed in the proposed disturbance area; and ▪ a list of critical times of the year (e.g., migration season, nesting bird season) where nighttime lighting mitigation measure would apply. ▶ Following completion of the biotic resource assessment report, the qualified biologist shall submit the report to Sonoma County Planning Department for review. If no special status species, sensitive			

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	habitat, wetlands, or other waters are identified on an individual project site, no further mitigation is required. ▶ If special-status species, sensitive habitats, or wetlands or other waters are present or have the potential to be present, the qualified biologist developing the biotic resource assessment report shall include a discussion of potential direct and indirect impacts (temporary and permanent) on these resources, including identifying the project activities that would lead to impacts, and the appropriate biological resource protection measures identified in Mitigation Measures 3.4-1b, 3.4-1c, 3.4-2a through 3.4-2q, 3.4-4, 3.4-5, 3.4-6a through 3.4-6d, 3.4-6c, 3.4-8 shall be implemented.			
Impact 3.4-1: Result in Disturbance to or Loss of Special-Status Plant Species and Habitat	**Mitigation Measure 3.4-1b (DRH or UPC): Conduct Special-Status Plant Surveys and Implement Avoidance Measures and Mitigation** If the biotic resources assessment (see Mitigation Measure 3.4-1a) identifies the presence or potential presence of special-status plant species on the proposed cannabis site (including cannabis premises and supporting improvements outside of the premises), Sonoma County shall require the following standards through the design review approval process for new construction in industrial and commercial zones and for new cannabis uses requiring a use permit in agricultural and resources zones: ▶ Within one year prior to the start of project-related ground disturbing activities and during the blooming period for the special-status plant species with potential to occur on the site, a qualified botanist shall conduct protocol-level surveys for special-status plants in all proposed disturbance areas, including temporary features, following survey methods from the CDFW *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW 2018a). ▶ If special-status plants are not identified, the botanist shall document the findings in a report to the applicant, County, and CDFW, and no further mitigation shall be required. ▶ If special-status plant species are found, the qualified botanist shall consult with CDFW to designate a no-disturbance buffer or redesign of the cannabis site that shall be reflected in application materials to the County. If special-status plants cannot be avoided, then the	Applicant to submit pre-disturbance survey(s) and notification to County County to verify survey(s), additional requirements (if any), and final report compliance County to verify compliance or whether compliance is not feasible due to federal status of species listing	Survey(s) and notification to County required prior to initial ground-disturbing activities or issuance of grading or building permits (whichever is first) for UPC or DRH. Verify compliance prior to initial ground-disturbing activities or issuance of grading or building permits (whichever is first) for UPC or DRH.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	applicant shall consult with CDFW to determine if an incidental take permit should be obtained (i.e., for special-status species listed under CESA) or if compensatory mitigation would be required. Impacts on special-status plant species will be mitigated such that there would be no net loss of occupied habitat or individuals. Mitigation measures shall include, at a minimum, preserving and enhancing existing populations, establishing populations through seed collection or transplantation from the site that is to be affected, and restoring or creating habitat in sufficient quantities to achieve no net loss of occupied habitat or individuals. Habitat and individual plants lost shall be mitigated at a minimum 2:1 ratio, considering acreage, as well as function and value, and in compliance with Sonoma County General Plan Policy OSRC-7b-1-d (though this only applies in designated Biotic Habitat Areas, which are only approximately 3.2 percent of the Program Area). As outlined in that policy, acreage required for adequate mitigation and replacement habitat shall be at least two times the acreage affected unless a lower level is acceptable to the applicable state agencies, with the amount depending on the habitat affected and the applicable mitigation priority value. Success criteria for preserved and compensatory populations shall include the following conditions: ▪ The extent of occupied area and plant density (number of plants per unit area) in compensatory populations shall be equal to or greater than the affected occupied habitat. ▪ Compensatory and preserved populations shall be self-producing. Populations shall be considered self-producing when: • Plants reestablish annually for a minimum of 5 years with no human intervention, such as supplemental seeding; and • Reestablished and preserved habitats contain an occupied area and flower density comparable to existing occupied habitat areas in similar habitat types in the project vicinity. • If off-site mitigation includes dedication of conservation easements, purchase of mitigation credits, or other off-site conservation measures, the details of these measures shall be included in the mitigation plan, including information on responsible parties for long-term management, conservation			

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	easement holders, long-term management requirements, success criteria such as those listed above, and other details, as appropriate to target the preservation of long-term viable populations. ▪ Any mitigation plan for impacts on special-status plants must be reviewed and approved by Sonoma County and CDFW. ▶ If special-status plants covered by the Santa Rosa Plain Conservation Strategy (Burke's goldfield, Sonoma sunshine, Sebastopol meadowfoam, and many-flowered navarretia) are found and the proposed disturbance area is located in the Conservation Strategy plan area, direct and indirect impacts on these plants shall be completely avoided through implementation of no-disturbance buffers or redesign of the project. If the plants cannot be completely avoided, the application shall be denied until such a time that cannabis uses are legalized under federal law and federal incidental take permitting through participation in the Conservation Strategy may be pursued. If the plants cannot be completely avoided and cannabis uses are legalized under federal law, applicants will pursue federal incidental take permitting through participation in the Conservation Strategy.			
Impact 3.4-1:	**Mitigation Measure 3.4-1c (DRH or UPC): Implement Measures to Avoid Introduction or Spread of Invasive Plant and Wildlife Species** If the biotic resources assessment (see Mitigation Measure 3.4-1a) determines that special-status plants are present or potentially present on the proposed cannabis site (including cannabis premises and supporting improvements outside of the premises), Sonoma County shall require the following standards through the design review approval process for new construction in industrial and commercial zones and for new cannabis uses requiring a use permit in agricultural and resources zones: ▶ The application shall include identification of invasive plant species that occur on the site and where they are located. After identifying what type of invasive species could be or are present on the project site, the application shall identify specific measures to be employed for the removal of invasive species and on-site management practices.	Applicant to submit invasive species management plan County to verify plan compliance	Plan required at time of application for UPC or DRH. Verify plan compliance during the permit process and prior to UPC or DRH approval.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	▶ Invasive plant species (defined in the EIR, see Section 3.4.2 Environmental Setting, "Invasive Species") shall be removed from the site to the extent feasible, using measures appropriate to the species. For example, species that cannot easily reroot, resprout, or disperse seeds may be left on site in a debris pile. Species that resprout readily (e.g., English ivy) or disperse seeds (e.g., pampas grass) should be hauled off-site and disposed of appropriately at a landfill site. A qualified botanist shall determine the appropriate percent cover of invasive species to remove for the site and what type of restoration plantings shall be appropriate for the site. ▶ The site shall be monitored by a qualified botanist annually for 3 years or until the following success criteria are met, whichever is longer: ▪ Cover of existing invasive plants has either decreased or remained unchanged, there are no new infestations of invasive plants that existed on the site before project implementation, and there are no new invasive plant species that were not present onsite before project implementation. ▶ Heavy equipment and other machinery shall be inspected for the presence of invasive species before on-site use, and shall be cleaned before entering the site, to reduce the risk of introducing invasive plant species. ▶ No nonnative fish species shall be introduced into ponds on project sites. This measure does not apply to any activities conducted pursuant to the California Health and Safety Code, including mosquito control activities conducted by local vector control agencies. ▶ If storage ponds would be constructed, the applicant shall hire a qualified biologist to prepare an aquatic invasive species management plan, which shall include details regarding monitoring for aquatic invasive species, including bullfrogs, and appropriate measures for preventing establishment of these species and controlling invasive species populations. The aquatic invasive species management plan shall be reviewed and approved by Sonoma County prior to construction of stock ponds.	Applicant to submit monitoring reports County to verify monitoring compliance	Monitoring imposed through conditions of approval and required for 3 years after end of construction or start of operation (if no construction) or until success criteria are met. Verify monitoring compliance until success criteria are met.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
Impact 3.4-2: Result in Disturbance to or Loss of Special-Status Wildlife Species and Habitat	**Mitigation Measure 3.4-1a (DRH or UPC): Conduct Biotic Resource Assessment Consisting of Pre-Application Biological Surveys and Project-Level Analysis**	See above.	See above.	
Impact 3.4-2 (continued)	**Mitigation Measure 3.4-2a (DRH or UPC): Conduct Pre-disturbance Surveys for Special-Status Amphibians and Implement Avoidance Measures** If the biotic resources assessment (see Mitigation Measure 3.4-1a) determines that special-status amphibians are present or potentially present on the proposed cannabis site (including cannabis premises and supporting improvements outside of the premises), Sonoma County shall require the following standards through the design review approval process for new construction in industrial and commercial zones and for new cannabis uses requiring a use permit in agricultural and resources zones: ▶ For California tiger salamander or California red-legged frogs: ▪ If California tiger salamanders or California red-legged frogs are detected during the initial biological survey (see Mitigation Measure 3.4-1a) or are determined to be likely to occur (i.e., aquatic or upland habitats potentially suitable for the species are present), then it shall be assumed that all cannabis-related activities, other than crop-swap, that involve construction, other project activities utilizing large machinery (by which special-status amphibians can be crushed), vegetation removal, or other ground disturbance, in all zoning districts in the Program could result in take of this species, and the application shall be denied until such a time that cannabis uses are legalized under federal law and protocol-level surveys by USFWS-approved biologists with ESA Section 10(a)(1)(A) permits may be conducted and federal incidental take permitting may be pursued. Furthermore, a buffer of 1.3 miles shall be established around existing known California tiger salamander breeding occurrences (e.g., Santa Rosa Plain Conservation Strategy Mapping, CNDDB), and cannabis uses shall also be prohibited within the buffer. ▪ If California tiger salamander or California red-legged frog are delisted from ESA and one of these delisted species are detected during the initial biological resources assessment survey (see	County to verify compliance or whether compliance is not feasible due to federal status of species listing Applicant to submit pre-disturbance survey(s) and notification to County (other species) County to verify pre-disturbance survey compliance (other species) County to verify use of plastic	Verify compliance during the permit process and prior to UPC or DRH approval. Survey(s) and notification to County required prior to initial ground-disturbing activities or issuance of grading or building permits (whichever is first) for UPC or DRH. Verify compliance prior to initial ground-disturbing activities or issuance of grading or building permits (whichever is first) for UPC or DRH. During project operation, verify compliance with plastic use and maintenance requirements during annual inspections.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	Mitigation Measure 3.4-1a) or are determined to be likely to occur (i.e., aquatic or upland habitats potentially suitable for the species are present on the site), protocol-level surveys shall be conducted by a qualified biologist. For California tiger salamander, *Interim Guidance on Site Assessment and Field Surveys for Determining Presence or a Negative Finding of the California Tiger Salamander* (USFWS and CDFG 2003) shall be used, and for California red-legged frog *Revised Guidance on Site Assessments and Field Surveys for the California Red-legged Frog* (USFWS 2005). If either of these species were identified in protocol-level surveys, work on the site shall not commence until the applicant has consulted with CDFW to determine whether mitigation measures, such as project design modifications, relocation of the site, or relocation of individual animals, shall be necessary and appropriate so that injury to or mortality of special-status amphibians shall be avoided. ▶ For California giant salamander, foothill yellow-legged frog, Pacific tailed frog, red-bellied newt, or other amphibians considered special-status detected during the initial biotic resource assessment survey (see Mitigation Measure 3.4-1a) application: ▪ If California giant salamanders, foothill yellow-legged frogs, Pacific tailed frogs, red-bellied newts, or any other amphibians considered special-status species are detected during the initial biotic resource assessment survey (see Mitigation Measure 3.4-1a) or are determined to be likely to occur based on the presence of habitat suitable for these species, the following measures shall apply: • A qualified biologist familiar with the life cycle of California giant salamander, foothill yellow-legged frog, Pacific tailed frog, and red-bellied newt shall conduct pre-disturbance surveys of proposed new disturbance areas within 48 hours before new disturbance activities. Pre-disturbance surveys for special-status amphibian species shall be conducted throughout the proposed development area, and a minimum 400-foot buffer around the proposed disturbance area. Surveys shall consist of "walk and turn" surveys of areas beneath surface objects (e.g., rocks, leaf litter, moss mats,			

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	coarse woody debris) for salamanders and visual searches for frogs. Appropriate surveys will be conducted for the applicable life stages (i.e., eggs, larvae, adults) depending on the timing of the survey. • If special-status amphibians are not detected during the pre-disturbance survey, then further mitigation is not required. • If California giant salamanders, foothill yellow-legged frogs, Pacific tailed frogs, or red-bellied newts are detected, injury to or mortality of special-status amphibians shall be avoided by modifying project design, relocating the site, or relocating individual animals (with an applicable CDFW scientific collecting permit and CDFW approval). A no-disturbance buffer shall be established around the location where the detection occurred, and around habitat suitable for the species detected, the size of which shall be determined by the qualified biologist such that injury and mortality of individuals, including individuals dispersing in upland habitats, would be avoided. No work shall occur in the no-disturbance buffer for the duration of disturbance activities. If the applicant determines that project implementation outside of the no-disturbance buffer is infeasible (i.e., most project objectives cannot be met), then the applicant may consult with CDFW to determine whether additional mitigation measures, such as compensatory mitigation would be necessary to minimize impacts on these species and allow development in the no-disturbance buffer. ▶ Polyethylene plastic used for agricultural shade or crop structures for cannabis cultivation shall be properly fastened, maintained in good condition, and regularly inspected for degradation from weather to prevent introduction of plastic into the natural environment, including waterways. ▶ Polyethylene plastic sheeting may not be placed directly on the ground.			

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
Impact 3.4-2 (continued)	**Mitigation Measure 3.4-2b (DRH or UPC): Conduct Pre-Disturbance Surveys for Northwestern Pond Turtle and Implement Avoidance Measures** If the biotic resources assessment (see Mitigation Measure 3.4-1a) determines that northwestern pond turtle is present or potentially present on the proposed cannabis site (including cannabis premises and supporting improvements outside of the premises), Sonoma County shall require the following standards through the design review approval process for new construction in industrial and commercial zones and for new cannabis uses requiring a use permit in agricultural and resources zones:	Applicant to submit pre-disturbance survey(s) and notification to County	Survey(s) and notification to County required prior to initial ground-disturbing activities or issuance of grading or building permits (whichever is first) for UPC or DRH.	
	▶ If northwestern pond turtles are detected during the initial biotic resource assessment survey (see Mitigation Measure 3.4-1a) or are determined to be likely to occur based on the presence of habitat suitable for this species, the following measures shall apply:	County to verify survey(s), additional requirements (if any), and final report compliance	Verify compliance prior to initial ground-disturbing activities or issuance of grading or building permits (whichever is first) for UPC or DRH.	
	▶ A qualified biologist familiar with the life history of northwestern pond turtle shall conduct pre-disturbance surveys of proposed new disturbance areas within 1,640 feet of any aquatic habitat within 24 hours before disturbance activities. ▪ If northwestern pond turtles are not detected during the pre-disturbance survey, then no further mitigation is required. ▪ If northwestern pond turtles are detected during the pre-disturbance survey, injury to or mortality of turtles shall be avoided by modifying project design, relocating the site, or relocating individual animals (with an applicable CDFW scientific collecting permit and CDFW approval). A no-disturbance buffer shall be established around the location where the detection occurred and around habitat suitable for northwestern pond turtle the size of which shall be determined by the qualified biologist such that injury and mortality of individuals, including individuals dispersing in upland habitats, would be avoided. No work shall occur in the no-disturbance buffer for the duration of disturbance activities. If the applicant determines that project implementation outside of the no-disturbance buffer is infeasible (i.e., most project objectives cannot be met), then the applicant may consult with CDFW to determine whether additional mitigation measures, such as	County to verify use of plastic	During project operation, verify compliance with plastic use and maintenance requirements during annual inspections.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	compensatory mitigation would be necessary to minimize impacts on northwestern pond turtles species and allow disturbance in the no-disturbance buffer. • If relocation of northwestern pond turtles is determined to be necessary and is approved by CDFW, turtles shall be relocated to similar nearby habitat free of predators (e.g., raccoons, coyotes, raptors, bullfrogs, nonnative turtles, other northwestern pond turtles) as determined by the qualified biologist. If northwestern pond turtles are relocated, a report shall be submitted electronically to CDFW within 15 days of the relocation. The report shall include the location, date, time, and duration of collection and release; the number of individuals relocated; and identification of the qualified biologist. ▶ If northwestern pond turtle, which is currently a candidate for listing under ESA, is listed as threatened (or endangered) in the future, take of individuals associated with cannabis activities shall be prohibited. If take cannot be avoided, the application shall be denied. ▶ Polyethylene plastic used for agricultural shade or crop structures shall be properly fastened, maintained in good condition, and regularly inspected for degradation from weather to prevent introduction of plastic into the natural environment, including waterways. ▶ Polyethylene plastic sheeting may not be placed directly on the ground.			
Impact 3.4-2 (continued)	**Mitigation Measure 3.4-2c (ZPC): Limit Removal of Trees to Outside of the Nesting Bird Season** Add the following standard to Section 26-18-115 (C)(4)(h): If trees will be removed from an orchard to support a crop swap, it must occur outside of the nesting bird season (September 1 through January 31).	County to verify compliance	Verify compliance during the permit process and prior to ZPC approval.	
Impact 3.4-2 (continued)	**Mitigation Measure 3.4-2d (DRH or UPC): Conduct Pre-Disturbance Nesting Raptor Surveys and Establish Protective Buffers** If the biotic resources assessment (see Mitigation Measure 3.4-1a) determines that nesting raptors (excluding burrowing owl and northern spotted owl) are present or potentially present on or adjacent to the	Applicant to submit pre-disturbance survey(s) and	Survey(s) and notification to County required prior to initial	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	proposed cannabis site (including cannabis premises and supporting improvements outside of the premises), Sonoma County shall require the following standards through the design review approval process for new construction in industrial and commercial zones and for new cannabis uses requiring a use permit in agricultural and resources zones: ▶ To minimize the potential for loss of nesting raptors, disturbance activities shall occur only during the nonbreeding season (September 1 through January 31) and outside the soil disturbance avoidance timeframe outlined in the *Best Management Practices Cannabis Cultivation* (Sonoma County Department of Agriculture n.d.-a), which all cannabis cultivation operations are required to follow. As such, all disturbance activities related to cannabis cultivation shall only occur from September 1 through October 31. In addition, disturbance activities for non-cultivation uses, as well as tree removal for cultivation uses that does not involve soil disturbance shall only occur during the nonbreeding season (September 1 through January 31). ▶ If removal of trees (without soil disturbance) cannot occur during the nonbreeding season (September 1 through January 31) or if ground-disturbing activities including removal of trees involving soil disturbance cannot occur between September 1 through October 31, the following will apply: ▪ Before removal of any trees or ground-disturbing activities between February 1 and August 31, a qualified biologist shall conduct pre-disturbance surveys for nesting raptors and shall identify active nests within a certain distance of the disturbance area, depending on the species that are known or have potential to be present. For northern harrier and short-eared owl, surveys shall occur at a minimum of 500 feet of the proposed disturbance area. For Swainson's hawk and white-tailed kite, surveys shall occur at a minimum of 0.25 miles of the proposed disturbance area. Additionally, for American peregrine falcon, bald eagle, and golden eagle, surveys shall occur at a minimum of 0.5 miles of the proposed disturbance area. The surveys shall be conducted between February 1 and August 31. Inaccessible areas (e.g., private property) within the 0.25-mile or 0.5-mile survey buffers shall be surveyed using binoculars or a spotting scope.	notification to County if vegetation removal occurs during nesting season (February 1 through August 31) or soil disturbance occurs during outdoor cultivation soil disturbance avoidance timeframe (November 1 through April 15) County to verify compliance County to verify use of plastic	ground-disturbing activities, tree removal, issuance of grading or building permits (whichever is first) for UPC or DRH. Verify compliance prior to initial ground-disturbing activities, tree removal, or issuance of grading or building permits (whichever is first) for UPC or DRH. During project operation, verify compliance with plastic use and maintenance requirements during annual inspections.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	▶ If no active nests are found, the qualified biologist shall submit a report documenting the survey methods and results to the applicant and CDFW, and no further mitigation shall be required. ▶ If active nests are found, impacts on nesting raptors, including direct removal and disturbance (e.g., noise, presence of construction crews) shall be avoided by establishing appropriate buffers around active nest sites identified during pre-disturbance raptor surveys. ▪ For northern harrier and short-eared owl, avoidance buffers will be established a minimum of 500 feet from the proposed disturbance area, including tree removal. For Swainson's hawk and white-tailed kite, avoidance buffers will be established a minimum of 0.25 miles of the proposed disturbance area, including tree removal. For American peregrine falcon, bald eagle, and golden eagle, avoidance buffers will be established a minimum of 0.5 miles from the proposed disturbance area, including tree removal. ▪ Buffer size may be adjusted if the qualified biologist and the applicant, in consultation with CDFW, determine that such an adjustment would not be likely to adversely affect the nest. Factors to be considered for determining buffer size shall include the presence of natural buffers provided by vegetation or topography, nest height, locations of foraging territory, and baseline levels of noise and human activity. ▪ The buffer areas shall be protected with construction fencing, and no activity shall occur within the buffer areas until the qualified biologist has determined, in coordination with CDFW, that the young have fledged, the nest is no longer active, or reducing the buffer would not likely result in nest abandonment. ▪ Monitoring of the nest by a qualified biologist during disturbance (e.g., ground disturbance, vegetation removal [including tree removal], installation of cannabis cultivation sites, installation of temporary event facilities, cannabis events) shall be required if the activity has potential to adversely affect the nest. ▶ Removal of bald and golden eagle nests is prohibited regardless of the occupancy status under the federal Bald and Golden Eagle Protection Act. If bald or golden eagle nests are found during pre-disturbance surveys, then the nest tree shall not be removed.			

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	▶ Polyethylene plastic used for agricultural shade or crop structures shall be properly fastened, maintained in good condition, and regularly inspected for degradation from weather to prevent introduction of plastic into the natural environment, including waterways. ▶ Polyethylene plastic sheeting shall not be placed directly on the ground.			
Impact 3.4-2 (continued)	**Mitigation Measure 3.4-2e (DRH or UPC): Conduct Take-Avoidance Survey for Burrowing Owl, Implement Avoidance Measures, and Compensate for Loss of Occupied Burrows or Nests** If the biotic resources assessment (see Mitigation Measure 3.4-1a) determines that burrowing owl is present or potentially present on or adjacent to the proposed cannabis site (including cannabis premises and supporting improvements outside of the premises), Sonoma County shall require the following standards through the design review approval process for new construction in industrial and commercial zones and for new cannabis uses requiring a use permit in agricultural and resources zones:	Applicant to submit pre-disturbance survey(s) and notification to County	Survey(s) and notification to County required prior to initial ground-disturbing activities, issuance of grading or building permits (whichever is first) for UPC or DRH.	
	▶ A qualified biologist shall conduct a pre-disturbance survey for burrowing owls in areas of habitat suitable for the species (e.g., grasslands, agricultural areas; as determined during the biotic resources assessment [Mitigation Measure 3.4-1a]) on and within a minimum of 1,640 feet of the cannabis site using survey methods described in Appendix D of the *Staff Report on Burrowing Owl Mitigation* (hereinafter, Staff Report; CDFG 2012), or any subsequent updated guidance. A minimum of four surveys shall be conducted to determine whether burrowing owls occupy the site. If feasible, at least one survey should be conducted between February 15 and April 15 and the remaining surveys should be conducted between April 15 and July 15, at least three weeks apart. Because burrowing owls may recolonize a site after only a few days, one of the surveys, or an additional survey, shall be conducted no less than 14 days before initiating ground disturbance activities to verify that take of burrowing owl would not occur. Inaccessible areas (e.g., private property) within the 1,640-foot survey buffer shall be surveyed using binoculars or a spotting scope.	County to verify surveys, additional requirements (if any), and final report compliance County to verify use of plastic	Verify compliance prior to initial ground-disturbing activities, or issuance of grading or building permits (whichever is first) for UPC or DRH. During project operation, verify compliance with plastic use and maintenance requirements during annual inspections.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	▶ If no burrowing owls, including occupied burrowing owl burrows, are found, the qualified biologist shall submit a burrowing owl report documenting the survey methods and results to the applicant, Sonoma County, and CDFW, and no further mitigation shall be required. ▶ If an active burrow is found during the surveys, the project applicant shall establish and maintain a buffer around the occupied burrow and any identified satellite burrows (i.e., non-nesting burrows that burrowing owls use to escape predators or move young into after hatching) to prevent take of the burrowing owls. ▪ During the non-breeding season (September 1 through January 31), the minimum buffer distance shall be 164 feet (50 m). During the breeding season (February 1 through August 31), the minimum buffer distance shall be increased to 1,640 feet (500 meters). ▪ The buffer may be adjusted if, in consultation with CDFW, a qualified biologist determines that an alternative buffer will not result in take of burrowing owl adults, young, or eggs because of particular site features (e.g., topography, natural line-of-sight barriers), level of project disturbance, or other considerations. If the buffer is reduced, a qualified biologist shall monitor the behavior of the burrowing owls during all project activities within 1,640 feet of the burrow. If the owls are disturbed or agitated (e.g., vocalizations, bill snaps, fluffing feathers to increase body size appearance, drooping wings and rotating them forward, crouching and weaving back and forth) by the project activities, the biologist shall have the authority to halt the activities and re-establish a buffer consistent with the first bullet until the agitated behavior ceases and normal behavior resumes. ▪ The buffer shall remain in place around the occupied burrow and associated satellite burrows until a qualified biologist has determined through noninvasive methods that the burrows are no longer occupied by burrowing owl. A previously occupied burrow will be considered unoccupied if surveys demonstrate that no owls have used the burrow for seven consecutive days. ▪ Locations of burrowing owls detected during surveys shall be reported to the CNDDB.			

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	▶ If implementation of a buffer to prevent take of burrowing owl is not feasible, the project applicant shall consult with CDFW and obtain an Incidental Take Permit (ITP) prior to commencing project related ground-disturbing activities. The impacts of taking burrowing owl shall be minimized and fully mitigated. Alternatively, ground disturbance can be delayed until a qualified biologist has determined through noninvasive methods that the burrows are no longer occupied by burrowing owl. A previously occupied burrow will be considered unoccupied if surveys demonstrate that no owls have used the burrow for seven consecutive days. ▶ If take of burrowing owl is likely to occur, the project applicant shall compensate for the loss of burrowing owl by establishing permanent protection and perpetual management on land that provides burrowing owl habitat. Habitat management lands for burrowing owl may be established by conservation easement or fee title or credits may be purchased from a CDFW-approved conservation or mitigation bank. The compensatory mitigation shall satisfy permit conditions and all other permit conditions shall be implemented. ▶ Polyethylene plastic used for agricultural shade or crop structures shall be properly fastened, maintained in good condition, and regularly inspected for degradation from weather to prevent introduction of plastic into the natural environment, including waterways. ▶ Polyethylene plastic sheeting may not be placed directly on the ground.			
Impact 3.4-2 (continued)	**Mitigation Measure 3.4-2f (DRH or UPC): Conduct Northern Spotted Owl Pre-Disturbance Habitat Suitability Surveys and Determine Presence or Absence of the Species** If the biotic resources assessment (see Mitigation Measure 3.4-1a) determines that northern spotted owl is present or potentially present on or adjacent to the proposed new cannabis site (including cannabis premises and supporting improvements outside of the premises), Sonoma County shall require the following standards through the design review approval process for new construction in industrial and commercial zones and for new cannabis uses requiring a use permit in agricultural and resources zones:	County to verify no old growth tree removal	Verify compliance prior to tree removal or issuance of grading or building permits (whichever is first) for UPC or DRH.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	▶ To avoid the potential for loss of northern spotted owls and their nests, or loss or fragmentation of occupied habitat or habitat suitable for northern spotted owl, removal of old-growth habitat shall be prohibited, as outlined in Mitigation Measure 3.4-4.	Applicant to submit pre-disturbance survey(s)	Survey(s) required at time of application for UPC or DRH.	
	▶ If the area of proposed new disturbance activities is within or adjacent to habitat suitable for northern spotted owl, as determined during implementation of Mitigation Measure 3.4-1a, and a qualified biologist determines it is within a minimum of 1.3 miles (average species home range) of a known occurrence of northern spotted owl, the following measures shall be followed:	County to verify survey(s), additional requirements (if any), and final report compliance	Verify compliance during the permit process and prior to UPC or DRH approval.	
	▪ Before permit application submittal, a qualified biologist familiar with the species and protocol, shall conduct pre-disturbance surveys for nests within a minimum 1.3-mile radius (i.e., buffer) around the site as described in *Protocol for Surveying Proposed Management Activities That May Impact Northern Spotted Owls* (USFWS 2012) and the 2019 revision to *Northern Spotted Owl Take Avoidance Analysis and Guidance for Private Lands in California* (USFWS 2019). Surveys shall take place between March 1 and August 31. At least six complete surveys per year over the course of 2 years must be completed to determine presence or absence of northern spotted owl. Three surveys must be completed by June 30 and must be conducted at least 7 days apart. Two additional surveys may be required after the first six if residency cannot be determined after a positive response.	County to verify use of plastic	During project operation, verify compliance with plastic use and maintenance requirements during annual inspections.	
	▪ Following 2 years of required surveys (and any additional surveys required if northern spotted owl residency cannot be determined following a positive response), if northern spotted owls are determined to be absent at a minimum of 1.3 miles from the site, then further mitigation is not required.			
	▪ If northern spotted owls are determined to be present within a minimum of 1.3 miles of the site, then it is presumed that habitat removal; loud, continuous noises; or visual stimuli could cause disturbance and harm to northern spotted owls and could result in take of northern spotted owls and the application shall be denied.			

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	▶ Polyethylene plastic used for agricultural shade or crop structures shall be properly fastened, maintained in good condition, and regularly inspected for degradation from weather to prevent introduction of plastic into the natural environment, including waterways. ▶ Polyethylene plastic sheeting shall not be placed directly on the ground.			
Impact 3.4-2 (continued)	**Mitigation Measure 3.4-2g (DRH or UPC): Conduct Pre-Disturbance Special-Status Nesting Bird Surveys and Establish Protective Buffers** If the biotic resources assessment (see Mitigation Measure 3.4-1a) determines that bank swallow, black swift, California black rail, California Ridgway's rail, grasshopper sparrow, purple martin, saltmarsh common yellowthroat, San Pablo song sparrow, tricolored blackbird, western snowy plover, western yellow-billed cuckoo, yellow rail, yellow warbler, and yellow-headed blackbird, or other bird nests are present or potentially present on or adjacent to the proposed cannabis site (including cannabis premises and supporting improvements outside of the premises), Sonoma County shall require the following standards through the design review approval process for new construction in industrial and commercial zones and for new cannabis uses requiring a use permit in agricultural and resources zones: ▶ To minimize the potential for disturbance to or loss of bank swallow, black swift, California black rail, California Ridgway's rail, grasshopper sparrow, purple martin, saltmarsh common yellowthroat, San Pablo song sparrow, tricolored blackbird, western snowy plover, western yellow-billed cuckoo, yellow rail, yellow warbler, and yellow-headed blackbird, and other bird nests, vegetation removal activities shall occur only during the nonbreeding (September 1 through January 31) season and outside soil disturbance avoidance timeframe outlined in the *Best Management Practices Cannabis Cultivation* (Sonoma County Department of Agriculture n.d.-a). As such, disturbance activities related to cannabis cultivation shall only occur from September 1 through October 31. In addition, disturbance activities for non-cultivation uses, as well as tree removal for cultivation uses that does not involve soil disturbance, disturbance activities shall occur only during the nonbreeding season (September 1 through January 31.	Applicant to submit pre-disturbance survey(s) and notification to County if vegetation removal occurs during nesting season (February 1 through August 31) or soil disturbance occurs during outdoor cultivation soil disturbance avoidance timeframe (November 1 through April 15) County to verify survey(s), additional requirements (if any), and final report compliance County to verify compliance or whether compliance is not feasible due to federal status ((i.e., California Ridgway's rail, western snowy plover,	Survey(s) and notification to County required prior to initial ground-disturbing activities, vegetation removal, issuance of grading or building permits (whichever is first) for UPC or DRH. Verify compliance prior to initial ground-disturbing activities, vegetation removal, issuance of grading or building permits (whichever is first) for UPC or DRH.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	▶ If seasonal avoidance is not possible (see bullet directly above), a pre-disturbance survey shall be conducted by a qualified biologist familiar with these species and survey protocols (where protocols are available) before removal of any vegetation or any ground disturbance. The surveys shall be conducted no more than 7 days before disturbance commences or as required by established protocols. The survey radius within which the qualified biologist will search for nests will include the proposed disturbance area and a 0.5-mile area surrounding the disturbance area (to account for the largest required no-disturbance buffer of 0.5 miles for western yellow-billed cuckoo). Inaccessible areas (e.g., adjacent private property) will not be surveyed directly, but the biologist may use binoculars or a spotting scope to survey these areas. Pre-disturbance surveys shall follow survey methods outlined in survey protocols where such protocols have been established, including *General Survey Methods for Covered Species* (for California black rail), USFWS *California Clapper Rail Survey Protocol* (for California Ridgway's rail), *Yellow-Billed Cuckoo Survey Protocols* (SWRCB n.d.; USFWS 2015; Halterman et al. 2016), and any other appropriate, current protocol published by CDFW or USFWS. ▪ If no active nests are found during pre-disturbance surveys, no further action under this measure (i.e., Mitigation Measure 3.4-2g) shall be required. ▪ If active nests associated with species listed under ESA (i.e., California Ridgway's rail, western snowy plover, western yellow-billed cuckoo) are found during pre-disturbance surveys, the applicant must avoid impacts by implementing no-disturbance buffers or redesigning the project until such time as federal permits, authorizations, and procedures/protocols can be applied. No-disturbance buffers for these species shall be at least 1,000 feet for western snowy plover and California Ridgway's rail, and at least 0.5 miles for western snowy plover. ▪ If active nests of species not listed under ESA are located during the pre-disturbance surveys, a no-disturbance buffer shall be established around active nests. The no-disturbance buffer shall be a minimum of 100 feet from the nest to avoid disturbance, depending on the species identified, until the nest is no longer	western yellow-billed cuckoo) County to verify use of plastic	During project operation, verify compliance with plastic use and maintenance requirements during annual inspections.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	active. No-disturbance buffers surrounding bank swallow and tricolored blackbird colonies or California black rail nests shall be a minimum of 500 feet. For species listed under CESA (i.e., bank swallow, California black rail, tricolored blackbird), occupied habitat shall be retained regardless of the activity status of the nest or colony. If avoidance of this habitat after the colony or nest is no longer active, is determined to be infeasible (e.g., most project objectives cannot be met) the applicant shall consult with CDFW to determine whether incidental take permitting and/or compensatory mitigation would be required to reduce impacts on these species. ▶ Polyethylene plastic used for agricultural shade or crop structures shall be properly fastened, maintained in good condition, and regularly inspected for degradation from weather to prevent introduction of plastic into the natural environment, including waterways. ▶ Polyethylene plastic sheeting shall not be placed directly on the ground.			
Impact 3.4-2 (continued)	**Mitigation Measure 3.4-2h (DRH or UPC): Conduct Marbled Murrelet Pre-Disturbance Habitat Suitability Surveys and Determine Presence or Absence of the Species** If the biotic resources assessment (see Mitigation Measure 3.4-1a) determines that marbled murrelet is present or potentially present on or adjacent to the proposed cannabis site (including cannabis premises and supporting improvements outside of the premises), Sonoma County shall require the following standards through the design review approval process for new construction in industrial and commercial zones and for new cannabis uses requiring a use permit in agricultural and resources zones: ▶ Within habitat suitable for marbled murrelet: To avoid loss of marbled murrelet and their nests, or loss or fragmentation of occupied habitat or habitat suitable for marbled murrelet, removal of old-growth habitat is prohibited, as outlined in Mitigation Measure 3.4-4. ▶ Adjacent to habitat suitable for marbled murrelet: If the area of proposed new disturbance activities is adjacent to habitat suitable for	County to verify no old growth tree removal Applicant to submit pre-disturbance survey(s) if tree removal or ground disturbance occurs during nesting season (April 15 through August 5)	Verify compliance prior to tree removal or issuance of grading or building permits (whichever is first) for UPC or DRH. Survey(s) and notification to County required prior to initial ground-disturbing activities, vegetation removal, issuance of grading or building permits (whichever is first) for UPC or DRH.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	marbled murrelet (e.g., coniferous forest), as determined by a qualified biologist, the following measures shall be followed: ▪ Removal of any trees or ground-disturbing activities from August 6 through April 14 would not require pre-disturbance surveys for marbled murrelet. Conversely, if seasonal avoidance is not possible, before removal of any trees or ground-disturbing activities from April 15 through August 5 that occurs adjacent to habitat suitable for marbled murrelet, a qualified biologist familiar with the life history of the marbled murrelet shall conduct pre-disturbance surveys for nests within a 0.25-mile radius (i.e., buffer) around the site, as described in *Methods for Surveying Marbled Murrelets in Forests: A Revised Protocol for Land Management and Research* (Mack et al. 2003). ▪ If marbled murrelets are determined to be absent at a minimum of 0.25 miles from the site, then further mitigation is not required. ▪ If marbled murrelets are determined to be present on the site or within 0.25 miles of the site, a 0.25-mile buffer (or a larger buffer, as recommended by CDFW) shall be established around occupied nest sites. No project activity may occur within the 0.25-mile buffer area or other recommended buffer by CDFW until the end of the marbled murrelet breeding season (August 6). The nest tree and any adjacent trees that provide screening or canopy cover to the nest shall be retained regardless of the diameter of the tree. ▶ Polyethylene plastic used for agricultural shade or crop structures shall be properly fastened, maintained in good condition, and regularly inspected for degradation from weather to prevent introduction of plastic into the natural environment, including waterways. ▶ Polyethylene plastic sheeting shall not be placed directly on the ground.	County to verify survey(s), additional requirements (if any), and final report compliance County to verify use of plastic	Verify compliance prior to initial ground-disturbing activities, vegetation removal, issuance of grading or building permits (whichever is first) for UPC or DRH. During project operation, verify compliance with plastic use and maintenance requirements during annual inspections.	
Impact 3.4-2 (continued)	**Mitigation Measure 3.4-2i (DRH or UPC): Conduct Crotch's Bumble Bee Pre-Disturbance Habitat Suitability Surveys and Pre-Disturbance Surveys** If the biotic resources assessment (see Mitigation Measure 3.4-1a) determines that Crotch's bumble bee is present or potentially present on the proposed cannabis site (including cannabis premises and	Applicant to submit habitat suitability study	Study required prior to UPC or DRH approval.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	supporting improvements outside of the premises), Sonoma County shall require the following standards through the design review approval process for new construction in industrial and commercial zones and for new cannabis uses requiring a use permit in agricultural and resources zones:	County to verify study compliance	County to verify study and final report compliance during the permit process and prior to UPC or DRH approval.	
	▶ Before implementation of ground-disturbing activities, a qualified biologist shall conduct a habitat suitability study for Crotch's bumble bee following the guidance in the *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species* (CDFW 2023), which requires collection of specific information to determine habitat suitability for this species which may be in excess of the information collected during implementation of the biotic resources assessment described in Mitigation Measure 3.4-1a (e.g., depending on the time of year the biotic resources assessment was conducted). Results of the Crotch's bumble bee habitat suitability study shall be submitted to the applicant, Sonoma County, and CDFW before initiating ground-disturbing activities. If the area of proposed new disturbance activities contains habitat suitable for Crotch's bumble bee (e.g., nesting habitat, foraging habitat), the following measures shall be followed.	Applicant to submit pre-disturbance survey(s) and notification to County if initial ground disturbing activities occur during the colony active period (April 1 through August 31)	Survey(s) and notification to County required prior to initial ground-disturbing activities, issuance of grading or building permits (whichever is first) for UPC or DRH.	
	▪ To avoid impacts on Crotch's bumble bee, cannabis-related disturbance activities shall not occur in habitats suitable for this species from April through August (i.e., colony active period) if feasible.	County to verify survey(s), additional requirements (if any), and final report compliance	Verify compliance prior to initial ground-disturbing activities, or issuance of grading or building permits (whichever is first) for UPC or DRH.	
	▪ If not feasible to avoid ground-disturbance activities from April through August, pre-disturbance surveys for Crotch's bumble bees shall be conducted following the guidance in the *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species* (CDFW, 2023).	County to verify use of plastic	During project operation, verify compliance with plastic use and maintenance requirements during annual inspections.	
	• If Crotch's bumble bees are not detected during the pre-disturbance survey, no additional mitigation is required.			
	• If Crotch's bumble bees are detected during the pre-disturbance survey, appropriate avoidance measures shall be implemented:			
	o Protective buffers shall be implemented around active nesting colonies until these sites are no longer active as			

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	determined by a qualified biologist. A qualified biologist, in consultation with CDFW, will determine the appropriate buffer size to protect nesting colonies; however, buffers shall be at least 50 feet. o If impacts on Crotch's bumble bee cannot be avoided, compliance with CESA and consultation with CDFW is required and the applicant shall acquire an incidental take permit (ITP) from CDFW. The applicant shall implement all avoidance measures included in the ITP such that take would be fully mitigated. Polyethylene plastic used for agricultural shade or crop structures shall be properly fastened, maintained in good condition, and regularly inspected for degradation from weather to prevent introduction of plastic into the natural environment, including waterways. ▶ Polyethylene plastic sheeting shall not be placed directly on the ground.			
Impact 3.4-2 (continued)	**Mitigation Measure 3.4-2j (DRH or UPC): Avoid Overwintering Monarch Habitat and Conduct Pre-Disturbance Monarch Survey** If the biotic resources assessment (see Mitigation Measure 3.4-1a) determines that monarch is present or potentially present on the proposed cannabis site (including cannabis premises and supporting improvements outside of the premises), Sonoma County shall require the following standards through the design review approval process for new construction in industrial and commercial zones and for new cannabis uses requiring a use permit in agricultural and resources zones: ▶ Monarch Overwintering Sites Identified: ■ To avoid impacts on monarch butterfly, new disturbance activities that remove any vegetation shall not occur in previously identified overwintering sites identified by Xerces (2024) and within a 100-foot buffer surrounding the overwintering site. ■ If, during implementation of Mitigation Measure 3.4-1, a previously undetected monarch overwintering site is found by a qualified biologist, new disturbance related to the Program	County to verify no disturbance to overwintering sites Applicant to submit pre-disturbance survey(s) and notification to County if initial ground disturbing activities or tree removal occur during overwintering period (October 1 through March 31)	Verify compliance during the permit process and prior to UPC or DRH approval. Survey(s) and notification to County required prior to initial ground-disturbing activities, tree removal, issuance of grading or building permits (whichever is first) for UPC or DRH.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	Update shall be prohibited in the overwintering site and within a 100-foot buffer surrounding the overwintering site. ▶ Habitat Potentially Suitable for Overwintering Sites Present on Project Site: ■ If, during implementation of Mitigation Measure 3.4-1a (biotic resources assessment), a qualified biologist determines that habitat suitable for overwintering monarchs is present in a new disturbance area, a qualified biologist familiar with monarchs and monarch overwintering habitat will conduct pre-disturbance surveys for monarch colonies in these areas between October 1 and March 31 and will identify any colonies found within the treatment area. Any identified colonies shall be avoided as described above. If no overwintering colonies are found, further mitigation to protect overwintering monarchs will not be required. ▶ Habitat Potentially Suitable for Monarch (Other Than Overwintering Sites) Present on Project Site: ■ If all disturbance activities are completed outside of the period when milkweed plants could host monarch eggs or caterpillars (i.e., all disturbance activities completed between October through February), surveys for milkweed plants, monarch eggs, and caterpillars would not be required. If disturbance activities cannot be completed between October and February, then during the period of March through September (i.e., when milkweed plants could host monarch eggs or caterpillars), and within no more than 14 days before implementing project activities, a qualified biologist shall conduct pre-disturbance surveys for milkweed plants and inspect these plants for monarch eggs, larvae (i.e., caterpillars), and pupae. Ground disturbance involving outdoor cultivation activities may not occur November 1 through April 15 per *Best Management Practices Cannabis Cultivation* (Sonoma County Department of Agriculture n.d.-a). If monarch eggs, caterpillars, or pupae are found, the host plants shall be avoided until metamorphosis is completed and adult butterflies emerge and leave the host plant. If no eggs or caterpillars are detected, no additional protection measures are necessary.	County to verify survey(s), additional requirements (if any), and final report compliance Applicant to submit pre-disturbance survey(s) and notification to County for milkweed plants, monarch eggs, larvae, and caterpillars, if initial ground disturbing activities occur during March 1 through September 30. County to verify survey(s), additional requirements (if any), and final report compliance County to verify compliance or whether compliance is not feasible due to federal status (monarch) County to verify use of plastic	Verify compliance prior to initial ground-disturbing activities, tree removal, or issuance of grading or building permits (whichever is first) for UPC or DRH. Survey(s) and notification to County required prior to initial ground-disturbing activities, issuance of grading or building permits (whichever is first) for UPC or DRH. Verify compliance prior to initial ground-disturbing activities, or issuance of grading or building permits (whichever is first) for UPC or DRH. During project operation, verify compliance with plastic use and maintenance requirements during annual inspections.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	▶ If monarch butterfly is listed, a survey protocol and federal permit requirements for surveyors may be established, in which case, USFWS would not permit these surveys for the project until such a time that cannabis uses are legalized under federal law and federal incidental take permitting may be pursued. In this case, if habitat suitable for monarch is determined to be present on a site during the initial biological survey (see Mitigation Measure 3.4-1a), before commencing any new disturbance activities, a qualified biologist shall conduct an additional habitat suitability study (in addition to the pre-disturbance surveys) to determine whether: (1) the project site is within the range of this species and (2) the project site contains the microhabitat features suitable for this species (e.g., vegetation and habitat type, host plant availability, food plant availability). Surveys to determine host plant and food plant availability shall be conducted during the typical bloom period for this species to increase the chances of detecting the plants, if present. ▪ If habitat suitable for monarch (if the species is listed under ESA at the time of the survey) is present in a new disturbance area, the habitat will be considered occupied, and because this species may be listed under ESA, the applicant must avoid impacts by implementing no-disturbance buffers or redesigning the project until such time as federal permits, authorizations, and procedures/protocols can be applied. If the project cannot be redesigned to avoid all habitat suitable for this species and potential edge effects, then the application shall be denied. ▶ Polyethylene plastic used for agricultural shade or crop structures shall be properly fastened, maintained in good condition, and regularly inspected for degradation from weather to prevent introduction of plastic into the natural environment, including waterways. ▶ Polyethylene plastic sheeting shall not be placed directly on the ground.			
Impact 3.4-2 (continued)	**Mitigation Measure 3.4-2k (DRH or UPC): Avoid Loss of Other Special-Status Butterfly Species and Host Plants** If the biotic resources assessment (see Mitigation Measure 3.4-1a) determines that Behren's silverspot butterfly, Callippe silverspot	Applicant to submit habitat suitability study if	Study required prior to UPC or DRH approval.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	butterfly, or Myrtle's silverspot butterfly are present or potentially present on the proposed cannabis site (including cannabis premises and supporting improvements outside of the premises), Sonoma County shall require the following standards through the design review approval process for new construction in industrial and commercial zones and for new cannabis uses requiring a use permit in agricultural and resources zones: ▶ To avoid impacts on Behren's silverspot butterfly, Callippe silverspot butterfly, or Myrtle's silverspot butterfly, depending on the species, new disturbance related to cannabis activities shall not occur in coastal prairie habitat, coastal scrub habitat, or coastal dune/hill habitat, respectively. If these habitats can be avoided, no further mitigation is required. If avoidance of these habitats is not feasible, further mitigation would be required. ▪ Surveys for federally listed butterfly species, including Behren's Silverspot Butterfly Minimum Qualifications Guidelines to be Permitted for Presence/Absence Surveys for Adult Butterflies (USFWS 2024d), require surveyors to have recovery permits for these species pursuant to Section10(a)(1)(A) of ESA. Because of the current federal legal status of cannabis activities, USFWS would not permit these surveys for the project. Therefore, if habitat suitable for federally listed butterflies is determined to be present on a site during the initial biological survey (see Mitigation Measure 3.4-1a), before commencing any new disturbance activities, a qualified biologist shall conduct an additional habitat suitability study to determine whether: (1) the project site is within the limited range of any federally listed butterfly species and (2) the project site contains the microhabitat features suitable for these species (e.g., vegetation and habitat type, host plant availability, food plant availability). Surveys to determine host plant and food plant availability shall be conducted during the typical bloom period for these species to increase the chances of detecting the plants, if present. ▪ If habitat for federally listed butterflies is determined not to be present in a new disturbance area by the qualified biologist, a special-status butterfly report (in addition to the biotic resources	coastal prairie habitat, coastal scrub habitat, or coastal dune/hill habitat cannot be avoided County to verify study, additional requirements (if any), and final report compliance County to verify compliance or whether compliance is not feasible due to federal status (ESA listed butterflies) County to verify use of plastic	Verifycompliance during the permit process and prior to UPC or DRH approval. During project operation, verify compliance with plastic use and maintenance requirements during annual inspections.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	assessment [see Mitigation Measure 3.4-1a]) shall be prepared by the qualified biologist and submitted to the County for approval. ▪ If habitat suitable for Behren's silverspot butterfly, Callippe silverspot butterfly, or Myrtle's silverspot butterfly is present in a new disturbance area, the habitat will be considered occupied, and because these species are listed under ESA, the applicant must avoid impacts by implementing no-disturbance buffers or redesigning the project until such time as federal permits, authorizations, and procedures/protocols can be applied. If the project cannot be redesigned to avoid all habitat suitable for these species and potential edge effects, then the application shall be denied. ▶ Polyethylene plastic used for agricultural shade or crop structures shall be properly fastened, maintained in good condition, and regularly inspected for degradation from weather to prevent introduction of plastic into the natural environment, including waterways. ▶ Polyethylene plastic sheeting shall not be placed directly on the ground.			
Impact 3.4-2 (continued)	**Mitigation Measure 3.4-2l (DRH or UPC): Conduct Pre-Disturbance American Badger Survey and Establish Protective Buffers** If the biotic resources assessment (see Mitigation Measure 3.4-1a) determines that American badger is present or potentially present on the proposed cannabis site (including cannabis premises and supporting improvements outside of the premises), Sonoma County shall require the following standards through the design review approval process for new construction in industrial and commercial zones and for new cannabis uses requiring a use permit in agricultural and resources zones: ▶ Before the commencement of new disturbance activities, a qualified wildlife biologist shall conduct surveys of the grassland or disturbance on the site to identify any American badger burrows/dens. These surveys shall be conducted no more than 30 days before the start of disturbance activities. ▶ If no occupied American badger burrows are found, further mitigation is not required.	Applicant to submit pre-disturbance survey(s) and notification to County County to verify survey(s), additional requirements (if any), and final report compliance	Survey(s) and notification to County required prior to initial ground-disturbing activities, issuance of grading or building permits (whichever is first) for UPC or DRH. Verify compliance prior to initial ground-disturbing activities or issuance of grading or building permits (whichever is first) for UPC or DRH.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	▶ If occupied American badger burrows are found, impacts on active badger burrows shall be avoided through an exclusion zone around all active dens, the size and shape of which shall be established by a qualified biologist, in consultation with CDFW (but at least 100 feet). Within the exclusion zone, all project activities shall be prohibited until denning activities are complete or the den is abandoned. The qualified biologist shall monitor each den once per week to track the status of the den and to determine when it is no longer occupied. ▶ Polyethylene plastic used for agricultural shade or crop structures shall be properly fastened, maintained in good condition, and regularly inspected for degradation from weather to prevent introduction of plastic into the natural environment, including waterways. ▶ Polyethylene plastic sheeting shall not be placed directly on the ground.	County to verify use of plastic	During project operation, verify compliance with plastic use and maintenance requirements during annual inspections.	
Impact 3.4-2 (continued)	**Mitigation Measure 3.4-2m (DRH or UPC): Conduct Pre-Disturbance Surveys for Ringtail and Implement Avoidance Measures** If the biotic resources assessment (see Mitigation Measure 3.4-1a) determines that ringtail is present or potentially present on the proposed cannabis site (including cannabis premises and supporting improvements outside of the premises), Sonoma County shall require the following standards through the design review approval process for new construction in industrial and commercial zones and for new cannabis uses requiring a use permit in agricultural and resources zones: ▶ If all new disturbance (e.g., tree or shrub removal) is completed outside of the ringtail maternity season (i.e., all disturbance is conducted between July 1 and April 14), then surveys for ringtails would not be required. ▶ Before commencement of new disturbance (e.g., tree or shrub removal) occurring during the ringtail maternity season (April 15 through June 30), a qualified wildlife biologist shall conduct pre-disturbance surveys no more than 30 days before the start of disturbance activities of all habitat suitable for ringtail on the site and shall record sightings of individual ringtails, as well as potential dens. No soil disturbance shall occur November 1 through April 15, consistent with *Best Management Practices Cannabis Cultivation*	Applicant to submit pre-disturbance survey(s) and notification to County if initial ground disturbing activities or vegetation removal occur during maternity season (April 15 through June 30) County to verify survey(s), additional requirements (if any), and final report compliance	Survey(s) and notification to County required prior to initial ground-disturbing activities, vegetation removal, issuance of grading or building permits (whichever is first) for UPC or DRH. Verify compliance prior to initial ground-disturbing activities, vegetation removal, or issuance of grading or building permits (whichever is first) for UPC or DRH.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	(Sonoma County Department of Agriculture n.d.-a). No action is needed if disturbance occurs outside of the time periods described herein. ▶ If no individuals or potential or occupied dens are found, further mitigation is not required. ▶ If ringtails are detected or if potential dens of this species are located, an appropriate method shall be used by the qualified wildlife biologist to confirm whether a ringtail is occupying the den. This may involve use of remote field cameras, track plates, or hair snares. Other devices, such as a fiber optic scope, may be used to determine occupancy. If no ringtail occupies the potential den, the entrance shall be temporarily blocked—after it has been fully inspected—so that no other animals occupy the area during ground disturbance, vegetation removal, or installation of cannabis site. The blockage shall be removed after new disturbance activities, including vegetation removal, grading, and construction have been completed. ▶ If a den is found to be occupied by a ringtail, a no-disturbance buffer shall be placed around the occupied den location. The no-disturbance buffer shall include the den tree (or other structure) plus a buffer the size of which shall be determined by the biologist in coordination with CDFW to prevent disturbance and abandonment (but at least 250 feet). Disturbance activities in the no-disturbance buffer shall be avoided until the den is unoccupied as determined by a qualified wildlife biologist in coordination with CDFW. ▶ Polyethylene plastic used for agricultural shade or crop structures shall be properly fastened, maintained in good condition, and regularly inspected for degradation from weather to prevent introduction of plastic into the natural environment, including waterways. ▶ Polyethylene plastic sheeting shall not be placed directly on the ground.	County to verify use of plastic	During project operation, verify compliance with plastic use and maintenance requirements during annual inspections.	
Impact 3.4-2 (continued)	**Mitigation Measure 3.4-2n (DRH or UPC): Conduct Pre-Disturbance Special-Status Bat Surveys and Establish Protective Buffers** If the biotic resources assessment (see Mitigation Measure 3.4-1a) determines that pallid bat, Townsend's big-eared bat, or western red bat			

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	are present or potentially present on the proposed cannabis site (including cannabis premises and supporting improvements outside of the premises), Sonoma County shall require the following standards through the design review approval process for new construction in industrial and commercial zones and for new cannabis uses requiring a use permit in agricultural and resources zones:	Applicant to submit pre-disturbance survey(s) and notification to County	Survey(s) and notification to County required prior to initial ground-disturbing activities, tree removal, issuance of grading or building permits (whichever is first) for UPC or DRH.	
	▶ Within 30 days of commencing any disturbance related to cannabis activities, a qualified biologist shall conduct surveys for roosting bats. If evidence of bat use is observed, the species and number of bats using the roost shall be determined. Bat detectors may be used to supplement survey efforts. If no evidence of bat roosts is found, then no further mitigation is required.	County to verify survey(s), additional requirements (if any), and final report compliance	Verify compliance prior to initial ground-disturbing activities, tree removal, or issuance of grading or building permits (whichever is first) for UPC or DRH.	
	▶ If pallid bats, Townsend's big-eared bats, or western red bats are detected during the surveys, a program addressing mitigation for the specific occurrence (including at a minimum, compensation, exclusion methods, and roost removal procedures) shall be submitted to CDFW by the qualified biologist subject to the review and approval of CDFW. Implementation of the mitigation plan shall be a condition of project approval. The mitigation plan shall establish a buffer area around the roost during hibernation or while females in maternity colonies are nursing young that is large enough to prevent disturbance to the colonies (typically at least 250 feet).	County to verify use of plastic	During project operation, verify compliance with plastic use and maintenance requirements during annual inspections.	
	▶ Polyethylene plastic used for agricultural shade or crop structures shall be properly fastened, maintained in good condition, and regularly inspected for degradation from weather to prevent introduction of plastic into the natural environment, including waterways.			
	▶ Polyethylene plastic sheeting shall not be placed directly on the ground.			
Impact 3.4-2 (continued)	**Mitigation Measure 3.4-2o (DRH or UPC): Conduct Pre-Disturbance Sonoma Tree Vole Surveys and Implement Avoidance Measures** If the biotic resources assessment (see Mitigation Measure 3.4-1a) determines that Sonoma tree vole is present or potentially present on the proposed cannabis site (including cannabis premises and supporting improvements outside of the premises), Sonoma County shall require the following standards through the design review approval process for	County to verify no old growth tree removal	Verify compliance prior to tree removal or issuance of grading or building permits (whichever is first) for UPC or DRH.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	new construction in industrial and commercial zones and for new cannabis uses requiring a use permit in agricultural and resources zones: ▶ To minimize the potential for loss of or disturbance to Sonoma tree vole habitat and nests, removal of old-growth habitat shall be prohibited, as outlined in Mitigation Measure 3.4-4 below. ▶ Before commencing any tree- or other vegetation-removal activities or ground disturbance, and no more than 7 days before disturbance activities commence, a qualified biologist shall conduct pre-disturbance surveys for Sonoma tree vole nests (e.g., searching for nests in in trees on the site and confirming that nests belong to voles rather than squirrels or birds). If no evidence of Sonoma tree vole nests is found, then no further mitigation for the species is required. ▶ If occupied trees or nests are identified within a minimum of 100 feet of the site, the qualified biologist shall determine whether project disturbance activities shall adversely affect the voles, based on factors such as noise level of disturbance activities or line of sight between the tree and the disturbance source. If it is determined that disturbance activities would not affect the voles, then disturbance can proceed without protective measures. ▶ If the biologist determines that disturbance activities would likely disturb Sonoma tree vole nests, a buffer shall be established, the size of which shall be determined by the qualified biologist such that disturbance of the nest would not occur (typically at least 100 feet). No disturbance activities shall occur within the buffer until the nest is determined to be inactive by a qualified biologist. ▶ Polyethylene plastic used for agricultural shade or crop structures shall be properly fastened, maintained in good condition, and regularly inspected for degradation from weather to prevent introduction of plastic into the natural environment, including waterways. ▶ Polyethylene plastic sheeting shall not be placed directly on the ground.	Applicant to submit pre-disturbance survey(s) and notification to County County to verify survey(s), additional requirements (if any), and final report compliance County to verify use of plastic	Survey(s) and notification to County required prior to initial ground-disturbing activities, tree removal, issuance of grading or building permits (whichever is first) for UPC or DRH. Verify compliance prior to initial ground-disturbing activities, tree removal, or issuance of grading or building permits (whichever is first) for UPC or DRH. During project operation, verify compliance with plastic use and maintenance requirements during annual inspections.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
Impact 3.4-2 (continued)	**Mitigation Measure 3.4-2p (ZPC, UPC, DHR): Implement Mitigation Measure 3.1-4b** ▶ Mitigation Measure 3.1-4b: (ZPC, UPC, DRH): Implement New Light and Glare Requirements	See above.	See above.	
Impact 3.4-2 (continued)	**Mitigation Measure 3.4-2q (DRH or UPC): Implement Operational Noise Reduction Measures for Northern Spotted Owl and Marbled Murrelet** If the biotic resources assessment (see Mitigation Measure 3.4-1a) determines that northern spotted owl or marbled murrelet habitat occurs within 0.25 mile of a proposed cannabis premises, the applicant shall demonstrate compliance (e.g., prepare a noise analysis) with the following standards for all operational noise-generating activities through the design review approval process for new construction in industrial and commercial zones and for new cannabis uses requiring a use permit in agricultural and resources zones. The noise analysis will evaluate potential noise impacts from both regular operations and cannabis events and will include details regarding when noise monitoring would be required as well as the timing and frequency of noise monitoring to ensure an operation meets the following standards. ▶ Project-generated sound must not exceed ambient nesting conditions (determined by a qualified biologist) by 20–25 A-weighted decibels (dBA). ▶ Project-generated sound, when added to existing ambient conditions, must not exceed 90 dBA.	Applicant to submit noise analysis County to verify compliance with noise thresholds and final report compliance	Study required prior to initial ground-disturbing activities, tree removal, issuance of grading or building permits (whichever is first) for UPC or DRH. Verify compliance prior to initial ground-disturbing activities, tree removal, or issuance of grading or building permits (whichever is first) for UPC or DRH.	
Impact 3.4-4: Result in Disturbance to or Loss of Sensitive Natural Communities, Riparian Habitat, Old-Growth Habitat, or Other Sensitive Habitats	**Mitigation Measure 3.4-1a (DRH or UPC): Conduct Biotic Resource Assessment Consisting of Pre-Application Biological Surveys and Project-Level Analysis**	See above.	See above.	
Impact 3.4-4 (continued)	**Mitigation Measure 3.4-1c (DRH or UPC): Implement Measures to Avoid Introduction or Spread of Invasive Plant and Wildlife Species**	See above.	See above.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
Impact 3.4-4 (continued)	**Mitigation Measure 3.4-4 (DRH or UPC): Identify, Avoid, and Protect Sensitive Natural Communities, Riparian Habitat, Old-Growth Habitat, or Other Sensitive Habitats or Provide Compensation** If the biotic resources assessment (see Mitigation Measure 3.4-1a) determines that sensitive natural communities, riparian habitat, old-growth habitat, or other sensitive habitats are present or potentially present on the proposed cannabis site (including cannabis premises and supporting improvements outside of the premises), Sonoma County shall require the following standards through the design review approval process for new construction in industrial and commercial zones and for new cannabis uses requiring a use permit in agricultural and resources zones: ▶ The qualified biologist shall perform a protocol-level survey following the CDFW *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (current version dated March 20, 2018) of the site before the start of new disturbance related to cannabis activities. Sensitive natural communities shall be identified using the best means possible, including keying them out using the most current edition of A Manual of California Vegetation (including updated natural communities data at http://vegetation.cnps.org/) or referring to relevant reports (e.g., reports found on the VegCAMP website). ▶ All sensitive habitat areas identified in the biotic resources assessment under Mitigation Measure 3.4-1a shall be flagged or fenced with brightly visible construction flagging and/or fencing under the direction of the qualified biologist before disturbance activities begin, along with the appropriate buffer size. The buffer size shall be determined by the qualified biologist (such that the sensitive habitat is protected from direct and indirect impacts). In addition, no vegetation removal shall occur in these areas. Foot traffic by project personnel shall also be prohibited in these areas to prevent the introduction of invasive or weedy species. Periodic inspections during disturbance activities shall be conducted by the monitoring biologist to maintain the integrity of exclusion fencing/flagging during ground-disturbing activities. ▶ If the biotic resource assessment report prepared under Mitigation Measure 3.4-1a documents that site disturbance would affect the	Applicant to submit protocol-level survey(s) for sensitive natural communities County to verify survey(s), additional requirements or plans (if any), and final report compliance	Survey(s) required prior to UPC or DRH approval. Verify survey compliance during the permit process and prior to UPC or DRH approval. Verify exclusion fencing/flagging prior to initial ground-disturbing activities, tree removal, or issuance of grading or building permits (whichever is first) for UPC or DRH.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	bed, bank, channel, or associated riparian habitat subject to CDFW jurisdiction under Fish and Game Code Section 1602, a Streambed Alteration Notification shall be submitted to CDFW, pursuant to section 1600 et seq. of the Fish and Game Code. If proposed activities are determined to be subject to CDFW jurisdiction, the applicant shall abide by the conditions of any executed agreement before any ground disturbance. ▶ Old-growth habitat identified shall be avoided. Applications proposing to alter old-growth habitat shall be denied. "Old-growth habitat alteration" is defined as any human caused tree removal, change in canopy cover, removal of understory vegetation, or impact to the root systems of a tree within old-growth habitat that occurs as a result of disturbance activities, direct or indirect. ▶ In consultation with the County and CDFW, applicants shall compensate for permanent loss of riparian habitat at a minimum of a 2:1 ratio through contributions to a CDFW-approved wetland mitigation bank or through the development and implementation of a Compensatory Stream and Riparian Mitigation and Monitoring Plan for creating or restoring in-kind habitat in the surrounding area. If mitigation credits are not available, stream and riparian habitat compensation shall include establishment of riparian vegetation on currently unvegetated bank portions of streams affected by the project and enhancement of riparian habitat through removal of nonnative species, where appropriate, and planting of additional native riparian plants to increase the cover, continuity, and width of the riparian corridor along streams in the site and surrounding areas. ▶ The Compensatory Stream and Riparian Mitigation and Monitoring Plan shall identify: ■ compensatory mitigation sites and criteria for selecting these mitigation sites; ■ in-kind reference habitats for comparison with compensatory riparian habitats (using performance and success criteria) to document success; ■ monitoring protocol, including schedule and annual sensitive habitat report requirements (compensatory habitat shall be monitored for a minimum of 5 years from completion of			

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	mitigation, or human intervention [including recontouring and grading], or until the success criteria identified in the approved mitigation plan have been met, whichever is longer); ▪ ecological performance standards, based on the best available science and including specifications for native riparian plant densities, species composition, amount of dead woody vegetation gaps and bare ground, and survivorship; at a minimum, compensatory mitigation planting sites must achieve 80-percent survival of planted riparian trees and shrubs by the end of the 5-year maintenance and monitoring period, or dead and dying trees shall be replaced and monitoring continued until 80-percent survivorship is achieved; ▪ corrective measures if performance standards are not met; ▪ responsible parties for monitoring and preparing sensitive habitat reports; and ▪ responsible parties for receiving and reviewing sensitive habitat reports and for verifying success or prescribing implementation or corrective actions.			
Impact 3.4-5: Result in Disturbance to or Loss of State or Federally Protected Wetlands and Other Waters	**Mitigation Measure 3.4-1a (DRH or UPC): Conduct Biotic Resource Assessment Consisting of Pre-Application Biological Surveys and Project-Level Analysis**	See above.	See above.	
Impact 3.4-5 (continued)	**Mitigation Measure 3.4-1c (DRH or UPC): Implement Measures to Avoid Introduction or Spread of Invasive Plant and Wildlife Species**	See above.	See above.	
Impact 3.4-5 (continued)	**Mitigation Measure 3.4-5 (DRH or UPC): Identify State or Federally Protected Wetlands and Other Waters and Avoid These Features** If the biotic resources assessment (see Mitigation Measure 3.4-1a) determines that state and federally protected wetlands or other waters are present or potentially present on the project site, Sonoma County shall require the following standards through the design review approval process for new construction in industrial and commercial zones and for new cannabis uses requiring a use permit in agricultural and resources zones: ▶ The application shall include a summary of sensitive resources, including wetlands, streams, and rivers, that were identified during	Applicant to submit wetland delineation, if required County to verify study, additional requirements (if	Study required and prior to UPC or DRH approval. Verify study, additional requirements (if any), and final report compliance during the	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	the biotic resource assessment survey conducted under Mitigation Measure 3.4-1a. State and federally protected wetlands or other waters are of special concern to resource agencies and are afforded specific consideration, based on Section 404 and Section 401 of the CWA, the Porter-Cologne Water Quality Control Act, and other applicable regulations. ▶ If the biotic resource assessment report documents that state or federally protected wetlands or other waters are present, a delineation of these resources shall be prepared by a qualified biologist. The delineation shall be submitted to the County and the RWQCB. If, based on the delineation, it is determined that fill of any state or federally protected wetlands would result from implementation of the project, then the applicant shall modify the proposed project to avoid these resources by providing a buffer of at least 100 feet around these features. Depending on site features, a buffer of greater than 100 feet may be required. Buffer size shall be determined in consultation with CDFW and RWQCB. ▶ If the project cannot be redesigned to avoid all federally protected wetlands and other waters, then the application shall be denied.	any), and final report compliance County to verify compliance or whether compliance is not feasible due to federal status (federally protected wetlands)	permit process and prior to UPC or DRH approval.	
Impact 3.4-6: Interfere with Resident or Migratory Wildlife Corridors or Native Wildlife Nursery Sites	**Mitigation Measure 3.4-1a (DRH or UPC): Conduct Biotic Resource Assessment Consisting of Pre-Application Biological Surveys and Project-Level Analysis**	See above.	See above	
Impact 3.4-6 (continued)	**Mitigation Measure 3.4-4 (DRH or UPC): Identify, Avoid, and Protect Sensitive Natural Communities, Riparian Habitat, and Old-Growth Habitat, or Other Sensitive Habitats or Provide Compensation**	See above.	See above	
Impact 3.4-6 (continued)	**Mitigation Measure 3.4-5 (DRH or UPC): Identify State or Federally Protected Wetlands and Other Waters and Avoid These Features**	See above.	See above	
Impact 3.4-6 (continued)	**Mitigation Measure 3.4-6a (ZPC): Utilize Wildlife-Friendly Building and Fencing Designs** Add the following standard to Section 26-18-115 (C)(4)(h): Wildlife-friendly fencing designs shall be incorporated into projects located within a Habitat Connectivity Corridor mapped by the Sonoma County General Plan or a priority wildlife habitat or movement area	County to verify fencing compliance with standards	Verify compliance during the permit process and prior to ZPC approval.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	mapped by the Sonoma County Ag + Open Space Vital Lands Initiative, or Conservation Lands Network. This design shall be based on the following standards: ▶ To avoid impacts on wildlife, monofilament plastic netting, which is commonly used as trellising on cannabis plants, shall be taken down immediately after plants are harvested and disposed of properly. ▪ Fencing associated with the Program update including processing and ancillary activities will utilize wildlife-friendly fencing designed to minimize the risk of entanglement, entrapment, or impalement of wildlife. The fencing design shall meet the minimum following standards: • Minimize the chance of wildlife entanglement by not using barbed wire, loose or broken wires, or any material that could impale, snag, or entrap a leaping animal (e.g., wrought iron fencing with spikes). • Allow wildlife to jump over easily without injury. Typically, fences should be no more than 40 inches high on flat ground to allow adult deer to jump over. If fencing is required to be greater than 40 inches high for security or logistical purposes, then the fencing shall be high enough to deter wildlife from attempting to jump over (i.e., greater than 8 feet tall). • Hollow posts and pipes shall be capped, and metal fence stakes used in the project shall be plugged with bolts or other plugging materials. • Allow smaller wildlife to pass under easily without injury or entrapment by ensuring that fencing material is not installed directly touching the earth.	County to verify use of plastic	During project operation, verify compliance with plastic use and maintenance requirements during annual inspections.	
Impact 3.4-6 (continued)	**Mitigation Measure 3.4-6b (DRH and UPC): Review Mapping and Analyze Landscape Impacts for Approval** If the biotic resources assessment (see Mitigation Measure 3.4-1a) determines that the proposed project site is located within a Habitat Connectivity Corridor mapped by the Sonoma County General Plan or a priority wildlife habitat or movement area mapped by the Sonoma County Ag + Open Space Vital Lands Initiative, or Conservation Lands Network, Sonoma County shall require the following standards through	County to review compliance	Verify compliance during the permit process and prior to UPC or DRH approval.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	the design review approval process for new construction in industrial and commercial zones and for new cannabis uses requiring a use permit in agricultural and resources zones: ▶ If significant effects related to interference with wildlife corridors are identified as part of the biotic resources assessment required by Mitigation Measures 3.4-1a, and consultation with CDFW has been conducted, additional mitigation will be required for project approval. At a minimum, additional mitigation may include the following measures such that CDFW would be satisfied that impacts on wildlife movement would be less than significant: ▪ Redesigning the project to allow the corridor to continue to function, ▪ Building design or lighting measures, ▪ On-site habitat restoration, or ▪ Compensatory mitigation.			
Impact 3.4-6 (continued)	**Mitigation Measure 3.4-6c (DRH or UPC): Utilize Wildlife-Friendly Building and Fencing Designs** If the biotic resources assessment (see Mitigation Measure 3.4-1a) determines that wildlife habitat and movement occurs or potentially occurs on the proposed cannabis site (including cannabis premises and supporting improvements outside of the premises), Sonoma County shall require the following standards through the design review approval process for new construction in industrial and commercial zones and for new cannabis uses requiring a use permit in agricultural and resources zones: ▶ To avoid impacts on wildlife, monofilament plastic netting, which is commonly used as trellising on cannabis plants, shall be taken down immediately after plants are harvested and disposed of properly. ▶ Buildings and other permanent structures in the Program Area that would be constructed under the Program update, including for processing and ancillary activities shall be designed to minimize impacts on wildlife, including disruption to wildlife movement, bird strikes, and wildlife entanglement. ▶ Building design shall utilize guidelines regarding building height, materials, external lighting, and landscaping provided in the	County to verify building and fencing compliance with standards County to verify use of plastic	Verify compliance during the permit process and prior to UPC or DRH approval. During project operation, verify compliance with plastic use and maintenance requirements during annual inspections.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	American Bird Conservancy's Bird-Friendly Building Design (American Bird Conservancy 2015). The County shall require review of the conceptual design plans by a qualified biologist to determine whether the plans are sufficient to reduce the likelihood of bird strikes or recommend additional measures. ▶ Fencing associated with the Program update, including for cultivation sites or around buildings for processing and ancillary activities will utilize wildlife-friendly fencing designed to minimize the risk of entanglement, entrapment, or impalement of wildlife. The County shall require the review of fencing design by a qualified biologist prior to installation. The fencing design shall meet, but not be limited, to the following standards: ▶ Minimize the chance of wildlife entanglement by not using barbed wire, loose or broken wires, or any material that could impale, snag, or entrap a leaping animal (e.g., wrought iron fencing with spikes). ▶ Allow wildlife to jump over easily without injury. Typically, fences should be no more than 40 inches high on flat ground to allow adult deer to jump over. The determination of appropriate fence height will consider slope because steep slopes are more difficult for wildlife to pass. If fencing is required to be greater than 40 inches high for security or logistical purposes, then the fencing shall be high enough to deter wildlife from attempting to jump over (i.e., greater than 8 feet tall). ▶ Hollow posts and pipes shall be capped, and metal fence stakes used in the project shall be plugged with bolts or other plugging materials. ▶ Allow smaller wildlife to pass under easily without injury or entrapment by ensuring that fencing material is not installed directly touching the earth.			
Impact 3.4-6 (continued)	**Mitigation Measure 3.4-6d (DRH or UPC): Retain Wildlife Nursery Habitat and Implement Buffers to Avoid Wildlife Nursey Sites** If the biotic resources assessment (see Mitigation Measure 3.4-1a) determines that wildlife nursery habitat is present or potentially present on the proposed cannabis site (including cannabis premises and supporting improvements outside of the premises), Sonoma County shall require the following standards through the design review approval process for	Applicant to submit pre-disturbance survey(s) and notification to County	Survey(s) and notification to County required prior to initial ground-disturbing activities or issuance of grading or building	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	new construction in industrial and commercial zones and for new cannabis uses requiring a use permit in agricultural and resources zones: ▶ A qualified biologist shall conduct a pre-disturbance survey no more than 14 days prior to disturbance activities to identify the important habitat features of the wildlife nursery and, prior to commencement of disturbance activities (e.g., ground disturbance, vegetation removal, staging), shall mark these features for avoidance and retention during project construction and operation to maintain the function of the nursery habitat. ▶ A no-disturbance buffer shall be established around the nursery site if disturbance activities are required while the nursery site is active/occupied. The appropriate size and shape of the buffer shall be determined by a qualified biologist based on potential effects of project-related habitat disturbance, noise, visual disturbance, and other factors but shall typically be a minimum of 100 feet. No project activity shall commence within the buffer area until a qualified biologist confirms that the nursery site is no longer active/occupied. Monitoring of the effectiveness of the no-disturbance buffer around the nursery site by a qualified biologist during disturbance activities may be required. If disturbance activities cause agitated behavior of the individual(s), as observed during monitoring, the buffer distance shall be increased or disturbance activities modified until the agitated behavior stops. The qualified biologist shall have the authority to stop any disturbance activities that could result in potential adverse effects on wildlife nursery sites.	County to verify survey(s), additional survey requirements (if any), and final report compliance	permits (whichever is first) for UPC or DRH. Verify compliance prior to initial ground-disturbing activities, or issuance of grading or building permits (whichever is first) for UPC or DRH.	
Impact 3.4-8: Conflict with Provisions of an Adopted Habitat Conservation Plan, Natural Community Conservation Plan, or Other Approved Local, Regional, or State Habitat Conservation Plan	**Mitigation Measure 3.4-1a (DRH or UPC): Conduct Biotic Resource Assessment Consisting of Pre-Application Surveys and Project-Level Analysis**	See above.	See above.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
Impact 3.4-8 (continued)	**Mitigation Measure 3.4-1b (DRH or UPC): Conduct Special-Status Plant Surveys and Implement Avoidance Measures and Mitigation**	See above.	See above.	
Impact 3.4-8 (continued)	**Mitigation Measure 3.4-2a (DRH or UPC): Conduct Pre-Disturbance Surveys for Special-Status Amphibians and Implement Avoidance Measures**	See above.	See above.	
Impact 3.4-8 (continued)	**Mitigation Measure 3.4-8 (DRH or UPC): Limit New Disturbance Activities in the Santa Rosa Plain Conservation Strategy Plan Area** If the biotic resources assessment (see Mitigation Measure 3.4-1a) determines that California tiger salamander or Conservation Strategy special-status plants are present, potentially present on the proposed cannabis site (including cannabis premises and supporting improvements outside of the premises), or the project site is within the Conservation Strategy plan boundary, the following shall apply: ▶ If a new disturbance area is within the Santa Rosa Plain Conservation Strategy plan area and is specifically located within 1.3 miles of known California tiger salamander breeding or in an area with potential for California tiger salamander presence, as defined in the Conservation Strategy, the project shall be redesigned such that all new disturbance activities which include construction, installation of temporary event facilities such as tents or other activities that could involve trampling, grading, vegetation removal, and other ground disturbance activities, would occur outside of these designations. If the project cannot be redesigned to avoid these designations (e.g., the applicant's parcels are completely within the designations), then the application will be denied, and cannabis activities will not be permitted on the site. These prohibitions shall apply until such a time that cannabis uses are legalized under federal law and federal incidental take permitting through participation in the Conservation Strategy may be pursued.	County to verify compliance	Verify compliance during the permit process and prior to ZPC, UPC or DRH approval.	
Cultural Resources				
Impact 3.5-1: Cause a Substantial Adverse Change in the Significance of a Historical Resource	**Mitigation Measure 3.5-1 (UPC and DRH): Implement Additional Measures to Protect Historical Resources** Sonoma County shall require the following mitigation measures for cannabis project applications subject to a use permit or design review hearing.	Applicant to submit study	Study required and prior to UPC or DRH approval.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	▶ For all historic-age (over 45-years in age) buildings and structures, projects involving interior alterations, the addition of rooftop solar, or routine maintenance work, do not need evaluation of eligibility by an architectural historian. ▶ Applicants shall identify and evaluate all historic-age (over 45-years in age) buildings and structures that are proposed to be removed or proposed to have modifications as part of cannabis operations. This must include search results from the NWIC, preparation of an historic structure report and evaluation of resources to determine their eligibility for recognition under state, federal, or County Local Official Register of Historic Resources criteria. The evaluation shall be prepared by an architectural historian or historical architect who meets the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation's professional qualification standards. The evaluation shall comply with CEQA Guidelines Section 15064.5(b) and, if federal funding or permits are required, with Section 106 of the National Historic Preservation Act (NHPA) of 1966 (16 U.S.C., Section 470 et seq.). ▶ If resources eligible for inclusion in the NRHP, CRHR, or local Official Register of Historic Resources are identified, an assessment of impacts on these resources shall be included in the report, as well as detailed measures to avoid impacts. If avoidance of a significant architectural/built-environment resource is not feasible, additional mitigation options include, but are not limited to, specific design plans for historic districts or plans for alteration or adaptive reuse of a historical resource that follows the Secretary of the Interior's *Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitation, Restoring, and Reconstructing Historic Buildings*.	County to verify study, additional requirements (if any), and final report compliance	Verify during the permit process and prior to UPC or DRH approval.	
Impact 3.5-2: Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources	**Mitigation Measure 3.5-2a – (UPC and DRH) Cultural Resource Pre-Approval Evaluation** Sonoma County shall require the following mitigation measures for cannabis project applications subject to a use permit or design review hearing. ▶ The applicant must retain an archaeologist who meets the Secretary of the Interior's professional standards in archaeology to conduct a	Applicant to submit study County to verify study, additional requirements (if	Study required and prior to UPC or DRH approval.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	site-specific survey of the area and prepare a cultural resource survey report. The survey methodology (e.g., pedestrian survey, subsurface investigation) depends on whether the area has a low, moderate, or high sensitivity for resources, which is based on whether the records search and/or Native American consultation identifies archaeological resources near or within the treatment area. The cultural resource survey report must also include a search of the Sacred Lands Inventory that is maintained by the Native American Heritage Commission. The cultural resource survey report must comply with the applicable state or local agency procedures and include recommendations that must be implemented prior to and/or during construction to avoid or reduce impacts on archaeological resources, to the extent that the resource's physical constituents are preserved or their destruction is offset by the recovery of scientifically consequential information. The report must include whether archeological monitoring is required to ensure impacts to resources are avoided. ▶ The County shall send a referral to the Northwest Information Center to perform a records search of potential archeological or cultural resources contained in the California Historical Resources Information System (CHRIS).	any), and final report compliance	Verify during the permit process and prior to UPC or DRH approval.	
Impact 3.5-2 (continued)	**Mitigation Measure 3.5-2b – (UPC and DRH) Archeological Site Avoidance** Cannabis project applications shall be designed to avoid impacts to archaeological sites identified by Mitigation Measure 3.5-2a. A barrier (temporary fencing) and flagging shall be placed between the work location and any resources within 60 feet of a work location to minimize the potential for inadvertent impacts. The applicant must retain a qualified archeological monitor if the cultural resources survey report indicates that one is required to avoid impacts to archeological sites.	County to verify compliance of exclusion fencing/flagging and archeological monitor, if required	Verify compliance prior to initial ground-disturbing activities, or issuance of grading or building permits (whichever is first) for UPC or DRH.	
Impact 3.5-2 (continued)	**Mitigation Measure 3.5-2c (ZPC): Implement Mitigation Measure 3.15-1a** ▶ Mitigation Measure 3.15-1a (ZPC): Protection of Tribal Cultural Resources for Permitted Uses	See below.	See below.	
Impact 3.5-3: Disturb Human Remains	**Mitigation Measure 3.5-2a (UPC and DRH): Cultural Resource Pre-Approval Evaluation**	See above.	See above.	
Impact 3.5-3 (continued)	**Measure 3.5-3a (UPC and DRH): Implement Mitigation Measure 3.15-1c**			

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	▶ Measure 3.15-1c (UPC and DRH): Tribal Cultural Resources Pre-Approval Consultation	See below.	See below.	
Impact 3.5-3 (continued)	**Mitigation Measure 3.5-3b (UPC and DRH): Implement Mitigation Measure 3.15-1e** ▶ Measure 3.15-1e. (UPC and DRH) Avoidance of Human Remains	See below.	See below.	
Energy				
Impact 3.6-2: Conflict with or Obstruct a State or Local Plan for Renewable Energy or Energy Efficiency	**Mitigation Measure 3.6-2 (DRH and UPC): Implement Energy Conservation and Renewable Energy Measures** The following mitigation measures would be implemented through the design review with hearing or use permit for cannabis process for individual projects. ▶ Implement Tier 2 requirements of the most current CALGreen Code's EV-charging standards. ▶ On-site natural gas or propane use shall be avoided, with the exception of an emergency generator during emergencies. ▶ If natural gas or propane use cannot be feasibly avoided by a new cannabis cultivation or supply chain use's project design due to infrastructure limitations for rural project sites, other relevant project design characteristics may be implemented. A combination of the following measures shall be applied to individual cannabis cultivation and supply chain use sites to the degree that the additional British thermal units from natural gas combustion are completely offset as demonstrated in an energy or greenhouse gas report to be submitted to the County for review: ▪ a requirement to exceed the mandatory requirements of the most recent version of Part 6 of the Title 24 California Building Code (California Energy Code), ▪ a requirement to use low-flow appliances, ▪ a requirement to use Energy Star appliances, ▪ a requirement to procure all electricity from the Sonoma Clean Power Authority Evergreen Program, and	County to verify compliance	Verify compliance prior to issuance of grading or building permits and prior to building permit final for UPC or DRH.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	▪ a requirement to implement zero net energy buildings through the incorporation of on-site renewable energy features (i.e., solar photovoltaic or wind systems).			
Geology, Soils, and Mineral Resources				
Impact 3.7-4: Directly or Indirectly Destroy a Unique Paleontological Resource or Site	**Mitigation Measure 3.7-1 (DRH and UPC): Protection of paleontological resources.** The following mitigation measures would be implemented through the design review with hearing or use permit for cannabis process for individual projects. Where paleontological resources are discovered during grading and drainage, all work shall be halted in the vicinity of the find, the director shall be notified, and the following shall occur and be approved by the County before work may resume. The permittee shall retain a Qualified Professional Paleontologist to prepare a project-specific Paleontological Resource Mitigation and Monitoring Program (PRMMP). A qualified professional paleontologist is an individual with an M.S. or Ph.D. in paleontology or geology who is experienced with paleontological procedures and techniques, who is knowledgeable in the geology of California, and who has worked as a paleontological mitigation project supervisor for a least two years. Monitoring shall be conducted by a qualified paleontological monitor with experience in collection and salvage of paleontological resources. The PRMMP procedures and protocols shall include: 1. Location and type of ground disturbance requiring paleontological monitoring based on the location and depth of ground disturbing activity in the context of the paleontological potential and potential impacts outlined in this section. 2. Timing and duration of paleontological monitoring. 3. Procedures for work stoppage and collection of scientifically significant fossils; including identifiable specimens of vertebrate fossils, uncommon invertebrate, plant, and trace fossils. This must include the authority to temporarily direct, divert or halt construction activity to ensure that larger fossils can be removed in a safe and timely manner.	Applicant to submit Paleontological Resource Mitigation and Monitoring Program, if resources are discovered County to verify stop work, compliance with Paleontological Resource Mitigation and Monitoring Program, additional requirements (if any), and final report compliance	During grading or construction activities, prior to operation for UPC or DRH. Verify compliance during grading or construction activities, and prior to approving recommencement of grading or construction activities for UPC or DRH.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	4. The type and extent of data that should be collected with recovered fossils, such as field notes, photos, data, and maps. 5. Procedures for preparation and curation of fossils. Significant fossils shall be identified to the lowest possible taxonomic level, prepared to a curation-ready condition, and curated in a scientific institution with a permanent paleontological. 6. Minimum qualifications for qualified paleontologists and paleontological monitors. 7. Conditions under which modifications to the monitoring schedule could be implemented, such as when sediments are likely too young, or conditions are such that fossil preservation would have been unlikely, or that fossils present have little potential scientific value. Upon completion of grading and drainage work (and curation of fossils if necessary) the Qualified Professional Paleontologist shall prepare a final report outlining the results of the PRMMP. The report shall include discussion of the location, duration, and methods of the monitoring, stratigraphic sections, any recovered fossils, and the scientific significance of those fossils, and where fossils were curated. The report shall be submitted to the County prior to occupancy permits. If the monitoring efforts produced fossils, then a copy of the report shall also be submitted to the designated museum repository.			
Greenhouse Gas Emissions and Climate Change				
Impact 3.8-1: Conflict with an Applicable Plan, Policy, or Regulation Adopted for the Purpose of Reducing the Emissions of Greenhouse Gases	**Mitigation Measures 3.8-1: Implement Mitigation Measures 3.6-2 and 3.14-2.** ▶ Mitigation Measure 3.6-2 (DRH and UPC): Implement Energy Conservation and Renewable Energy Measures ▶ Mitigation Measure 3.14-2 (UPC and DRH): Conduct VMT Analysis and Identify Mitigation for VMT	See above and below.	See above and below.	
Impact 3.8-1 (continued)	**Mitigation Measures 3.8-2: Require Renewable Electrical Energy for Cultivation.** Sonoma County shall require the following mitigation measure for all cannabis cultivation projects.	County to verify compliance	Verify compliance prior to building permit final.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	The following requirement shall be included as a new performance standard for cannabis cultivation in Section 26-18-115(C)(1): ▶ Electrical power used for a cultivation site must be provided by on-grid power with 100% renewable source or on-site renewable energy generation, or a combination of the two.			
Hazards and Hazardous Materials				
Impact 3.9-3: Be Located on a Site Included on a List of Hazardous Material Sites Compiled Pursuant to Government Code Section 65962.5, Which Would Create a Significant Hazard to the Public or Environment or Create a Significant Hazard to the Public or Environment through Reasonably Foreseeable Upset and/or Accident Conditions Involving Release of Hazardous Materials	**Mitigation Measure 3.9-3 (DRH and UPC): Implement Soils Investigation Requirements** Sonoma County shall require the following mitigation measures for cannabis project applications subject to a use permit or design review with hearing. ▶ If a site is identified on the Cortese List, a Phase I Environmental Site Assessment (ESA) must be prepared. For all other sites, in the event that previously unidentified potentially hazardous materials are discovered at any time during ground disturbance, all work shall be halted in the vicinity and a Phase I ESA must be prepared. ▶ The required Phase I ESA must be prepared in accordance with the American Society for Testing and Materials' E-1527-05 standard. For work requiring any demolition, the Phase I ESA shall make recommendations for any hazardous building materials survey work that shall be done. All recommendations included in a Phase I ESA prepared for a site shall be implemented to protect public health. If a Phase I ESA indicates the presence or likely presence of contamination, the applicant shall prepare a Phase II ESA, and recommendations of the Phase II ESA shall be fully implemented before ground disturbance, which will be made a requirement for approval of the project.	Applicant to submit Phase I Environmental Site Assessment, if required County to verify assessment, additional requirements (if any), and final report compliance	Assessment required prior to UPC or DRH approval. Verify compliance during the permit process and prior to UPC or DRH approval.	
Hydrology and Water Quality				
Impact 3.10-2: Decrease of Groundwater Supplies or Interfere Substantially with Groundwater Recharge Such That the Project May Impede Sustainable	**Mitigation Measure 3.10-2a (DRH and UPC): Implement Additional Measures to Protect Groundwater Resources** Sonoma County shall require the following mitigation measures for cannabis project applications subject to a use permit or design review with hearing.	Applicant to submit groundwater study	Study required prior to UPC or DRH approval.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
Groundwater Management of the Basin	▶ For projects that demonstrate no increase in groundwater production at a site, no further documentation of water supply is required. Monitoring measures listed below would continue to apply ▪ If the project well is within 500 feet of a stream where water use, streamflow records, and other available information indicate streamflow is reduced below natural unimpaired levels, and reduced flows impact aquatic habitat, as determined by the County professional engineer or geologist. Zero net increase in groundwater use shall be established both annually and during the dry season from May 1 – October 31. ▶ For water supply wells located within Class 3 or 4 groundwater availability areas, no cannabis permit shall be granted without meeting the following standards. ▪ Proof of sufficient yield demonstrated through an 8-hour dry season well yield test with sustained yield of 5 gallons per minute per 1 AFY of irrigation demand, plus sufficient yield for other existing uses. ▪ A hydrogeologic report that meets the requirements set forth under Policy and Procedure 8-1-14 shall be prepared that contains supporting data and analysis to demonstrate that the onsite groundwater supply is adequate to meet the proposed uses and cumulative projected land uses in the area on a sustained basis, and that the operation will not: (1) result in or exacerbate an overdraft condition in basin or aquifer; (2) result in reduction of critical flow in nearby streams; or (3) result in well interference at offsite wells. ▶ For water supply wells located within medium- and high-priority groundwater basins, a groundwater report must be prepared in compliance with requirements set forth under Policy and Procedure 8-1-14. The report must demonstrate the following standards for issuance of a cannabis permit: ▪ consistency with applicable sustainable groundwater management programs, and ▪ that the project does not decrease the likelihood of achieving sustainability in the underlying basin. ▶ For water supply wells located within upper portions of critical habitat watersheds identified in the 2015 SWRCB's Emergency Information	County to verify study, additional requirements (if any), and final report compliance, and to establish maximum level of groundwater use Applicant to conduct groundwater monitoring and reporting to the County County to verify compliance with groundwater use limits, and impose adaptive management measures if use limits are exceeded	Verify compliance during the permit process and prior to UPC or DRH approval. Monitoring required monthly or as specified in conditions of approval and reporting required annually during operation Verify monitoring data annually upon receipt of monitoring reports	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	Order, and within the "Groundwater Sustainability Priority Areas" adopted by the Sonoma Valley GSA, or as further updated, a cannabis permit may only be granted if the report demonstrates that the cannabis use meets net zero groundwater standards consistent with Policy and Procedure 8-2-2. For critical habitat watersheds, zero net increase in groundwater use shall be established both annually and seasonally during the dry season from May 1 – October 31. ▶ For all discretionary projects reliant on water supply wells for irrigation that are increasing net groundwater use, a hydrogeologic report will be prepared in accordance with Policy and Procedure 8-1-14 if : ▪ The project well is within 500 feet of a stream where water use, streamflow records, and other available information indicate streamflow is reduced below natural unimpaired levels, and reduced flows impact aquatic habitat, as determined by the County professional engineer or geologist. The hydrogeologic report must establish no reduction of critical flow in nearby streams. ▪ The project well is within 500 feet of a production well on a nearby parcel and available information indicates that pumping of the project well could impact production of the nearby wells due to drawdown of water levels due to pumping and/or contribution to a condition of overdraft in the local aquifer, as determined by the County professional engineer or geologist. The hydrogeologic report must establish no well interference at offsite wells. ▶ A maximum level of groundwater use shall be established for each cannabis permit. Groundwater level and total quantity of water pumped shall be recorded monthly, or more frequently as specified in conditions of approval, and reported annually. Groundwater metering, groundwater level monitoring, reporting, maintenance, and meter calibration shall be conducted in accordance with Policy and Procedure 8-1-3. If monitoring data collected in compliance with Policy and Procedure 8-1-3 indicates groundwater use in excess of the maximum allowed for a permit, the facility operators, in conjunction with the County, shall develop and implement adaptive management measures to reduce groundwater extraction to comply with permitted levels. Adaptive management measures may include forbearance (i.e., prohibition of groundwater extraction from the months of April 1 to October 31, consistent with SWRCB Cannabis			

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	Policy under Order WQ 2023-0102-DWQ for surface water diversions), water conservation measures, reductions in on-site cannabis cultivation, alteration of the groundwater pumping schedule, or other measures determined appropriate. Adaptive management measures will remain in place as needed to maintain groundwater extraction within permitted levels.			
Impact 3.10-2 (continued)	**Mitigation Measure 3.10-2b (ZPC): Implement Groundwater Monitoring** Sonoma County shall require the following mitigation measures for cannabis project applications subject to zoning permit. The following requirements shall be included as new performance standards for new cannabis cultivation and crop swaps using groundwater in Section 26-18- 115(C)(4)(h): ▶ Net zero must be achieved both annually and during the dry season from May 1 – October 31. ▶ Groundwater Metering and Monitoring. An easement shall be recorded to provide Sonoma County personnel access to any on-site water well serving the proposed use and any required monitoring well to collect water meter readings and groundwater level measurements. Access shall be granted for this purpose Monday through Friday from 8:00 a.m. to 5:00 p.m. All easement language is subject to review and approval by Permit Sonoma and County Counsel prior to recordation. Groundwater level and total quantity of water pumped shall be recorded monthly and reported annually. Groundwater metering, groundwater level monitoring, reporting, maintenance, and meter calibration shall be conducted in accordance with Policy and Procedure 8-1-3. ▶ If groundwater extraction exceeds net zero production during the dry season (i.e., May 1 through October 31) or annually, the facility operators, in conjunction with the County, shall develop and implement adaptive management measures to reduce groundwater extraction to permitted levels. Adaptive management measures may include forbearance (e.g., prohibition of groundwater extraction from the months of April 1 to October 31, consistent with SWRCB Cannabis Policy under Order WQ 2023-0102-DWQ for surface water diversions), water conservation measures, reductions in on-site	Applicant to submit Net Zero study County to verify study, additional requirements (if any), and final report compliance Applicant to submit easement and install groundwater metering equipment County to record easement, verify metering equipment installation, and tank storage Applicant to conduct groundwater monitoring, reporting, maintenance, and meter calibration County to verify compliance with groundwater monitoring, reporting, maintenance, and meter calibration.	Study required prior to issuance of ZPC. Verify compliance during the permit process and prior to ZPC approval. Required prior to issuance of ZPC. Verify recordation, and compliance with metering installation and tank storage prior to issuance of ZPC Monitoring required monthly and reporting required annually during operation. Maintenance and meter calibration required in accordance with Policy and Procedure 8-1-3. Verify monitoring data annually upon receipt of monitoring reports	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	cannabis cultivation area, alteration of the groundwater pumping schedule, or other measures determined appropriate. ▶ A maximum of 100,000 gallons of new tank storage is allowed.			
Noise and Vibration				
Impact 3.12-1: Result in Excessive Short-Term Construction Noise Impacts	**Mitigation Measure 3.12-1a (DRH or UPC): Incorporate Noise Reduction Measures into Construction Specifications** Sonoma County shall require the following mitigation measures for cannabis project applications subject to issuance of a use permit or design review with hearing. To minimize noise levels during construction activities, the development of cannabis uses shall comply with the following measures during construction work. ▶ Noise-generating construction activities should be restricted to between the hours of 7:00 a.m. to 7:00 p.m. Monday through Saturday. No construction activities should occur on weekends or holidays. If work is necessary outside of these hours, the County should require the contractor to implement a construction noise monitoring program and, if feasible, provide additional mitigation as necessary (in the form of noise control blankets or other temporary noise barriers, etc.) for affected receptors. A sign(s) shall be posted on the site regarding allowable hours of construction. ▶ All construction equipment shall be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturer recommendations. Equipment shrouds shall be closed during equipment operation. ▶ Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment. Equipment shall be properly maintained and turned off when not in use. ▶ Unnecessary idling of internal combustion engines should be strictly prohibited. ▶ Locate stationary noise-generating equipment, such as air compressors or portable power generators, as far as possible from sensitive receptors as feasible. If they must be located near receptors,	County to verify compliance with noise measures	Verify measure is included on construction and/or building plans prior to issuance of grading or building permits.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	adequate muffling (with enclosures where feasible and appropriate) shall be used. Any enclosure openings or venting shall face away from sensitive receptors. ▶ Utilize "quiet" air compressors and other stationary noise sources where technology exists. ▶ Construction maintenance, storage and staging areas for construction equipment shall avoid proximity to residential areas to the maximum extent practicable. Stationary construction equipment, such as compressors, mixers, etc., shall be placed away from residential areas and/or provided with acoustical shielding. Quiet construction equipment shall be used when possible. ▶ Construction staging areas shall be established at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction. ▶ Control noise from construction workers' radios to a point where they are not audible at existing residences bordering the project site.			
	Mitigation Measure 3.12-1b (UPC or DRH): Prepare Noise Analysis for Ongoing Construction Projects Anticipated to Last One Year or More Sonoma County shall require the following mitigation measure for cannabis project applications subject to issuance of a use permit or design review with hearing. ▶ Sonoma County shall require the cannabis permit applicants to submit a noise analysis prepared in accordance with the County Guidelines for the Preparation of Noise Analysis. The noise analysis shall demonstrate compliance with the required County noise thresholds through the use of noise reduction measures (such as those identified in Mitigation Measure 3.12-1a) and will be subject to review by Permit Sonoma. This measure shall be incorporated into project-specific approvals.	Applicant to submit noise analysis County to verify analysis, additional requirements (if any), and final report compliance	Study required prior to UPC or DRH approval. Verify compliance during the permit process and prior to UPC or DRH approval.	
Impact 3.12-4: Cause Excessive Long-Term Operational Stationary Noise Levels	**Mitigation Measure 3.12-4a: Outdoor Amplified Live Music Requires a Use Permit at Storefront Retailers** The proposed Code Section 26-18-025 shall be modified to include the following standard.	County to verify code standard added to code	At program adoption	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	▶ Amplified live music at a storefront retailer is prohibited without a use permit.			
Impact 3.12-4 (continued)	**Mitigation Measure 3.12-4b (UPC): Noise Reduction Measures for Outdoor Amplified Live Music at Cannabis Events or at Storefront Retailers** The following mitigation measure would be implemented through the Use Permit process for individual projects.	Applicant to submit noise analysis	Study required prior to UPC approval.	
	▶ Applicants must demonstrate compliance with the County Noise Standards presented in General Plan Policy NE-1c and Table NE-2. If outdoor amplified live music is proposed, compliance with the County Noise Standards shall be demonstrated through a project-specific noise study prepared in accordance with the County Guidelines for the Preparation of Noise Analysis. Compliance with these requirements may be met through development design considerations such as;	County to verify analysis, additional requirements (if any), and final report compliance	Verify compliance during the permit process and prior to UPC approval.	
	▪ Locating performance areas away from noise sensitive land uses. ▪ Locating live music indoors. ▪ Positioning speaker at locations where noise barriers such as buildings can serve to reduce noise at off-site sensitive receptor locations. ▪ Prohibit amplified music or sound after 10:00 p.m.	Applicant to submit noise monitoring report(s)	Reports required during the first 3 cannabis events OR until 3 consecutive events have been demonstrated to meet standards, as described in mitigation measure for UPC	
	▪ During the sound testing of the amplified sound system prior to each event multiple sound level measurements shall be conducted along the property line of the most affected residential land uses. Volume settings shall be adjusted to ensure that the applicable county noise standards will not be exceeded at the residences during the event.	County to verify monitoring, additional requirements (if any), and final report compliance	Verify compliance during operation for UPC until success criteria are met	
	▶ Operators hosting cannabis events and storefront retailers will be required to conduct noise monitoring with a measuring device (e.g., electronic noise meter) during events and retailer activities as follows: ▪ Noise monitoring is required during the first 3 large-scale cannabis events. ▪ Noise monitoring is required during the first 3 small-scale cannabis events, except that if the use permit allows for small-			

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	scale cannabis events up to 50 people, at least 2 of the 3 monitoring dates must be events with 40 to 50 attendees. • If event noise exceeds General Plan Policy NE-1c and Table NE-2 noise standards at any monitored event, additional monitoring will be required until 3 consecutive events have been demonstrated to meet standards, after which additional monitoring will not be required unless a complaint is received. • If a noise complaint is received related to a cannabis event, noise monitoring will be required for the next 3 events, or until 3 consecutive events have been demonstrated to meet standards. ▪ Noise monitoring at storefront retailers is required for the first 3 activities involving outdoor amplified live music. If a noise complaint is received related to outdoor amplified live music, noise monitoring will be required for the next 3 events, or until 3 consecutive events have been demonstrated to meet standards. ▪ Non-compliance at greater than 3 consecutive cannabis events (large-scale or small-scale) or outdoor amplified live music activities at store front retailers, evidenced by monitoring data that exceeds standards or a failure to submit monitoring data within the required timeframe, will be subject to enforcement, which may include modification of conditions, redesign, suspension of events, or revocation of the use permit. Noise monitoring readings must be collected during periods of peak activity (e.g., during live music and peak attendance). A minimum of 2 readings is required per event. Monitoring reports must be submitted to the County within 7 days of each event requiring monitoring. Monitoring reports must include the noise measurements, time the measurements were taken, approximate number of attendees when the measurements were taken, peak attendance at the event, monitoring locations, and any other information requested by the County. Monitoring locations must be established by the Noise Analysis and be based on where noise from the event is most likely to cause an impact on nearby sensitive receptors.			

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
Impact 3.12-4 (continued)	**Mitigation Measure 3.12-4c (DRH): Implement Noise Reduction Measures to Reduce Operational Noise Impacts in Industrial and Commercial Districts** The following mitigation measures would be implemented through the design review with hearing (DRH) for individual projects. ▶ Demonstrate compliance with the County Noise Standards presented in Policy NE-1c (TABLE NE-2). Compliance with these requirements may be met through development design considerations such as those listed below. ▪ Selection of HVAC with low decibel rating. ▪ Locate HVAC units within equipment rooms or enclosures that incorporate noise reduction features, such as acoustical louvers. Equipment enclosures shall be oriented so that major openings (i.e., intake louvers, exhaust) are directed away from nearby noise-sensitive receptors. ▪ Set back all HVAC units as much as possible from off-site noise-sensitive receptors, including residential land uses. ▪ Position HVAC units on the opposite side of an on-site buildings from off-site sensitive receptors so that the buildings serve as an intervening noise barrier.	Applicant to submit noise reduction details County to verify noise reduction details, additional requirements (if any), and final report and building permit compliance	Plan required prior to approval for DRH. Verify plan during the permit process and prior to DRH approval. Verify building permit compliance with noise reduction plan prior to issuance of building permit(s) for DRH.	
Transportation				
Impact 3.14-2: Conflict or Be Inconsistent with CEQA Guidelines Section 15064.3(b) Regarding Vehicle Miles Traveled	**Mitigation Measure 3.14-2 (UPC, DRH): Conduct VMT Analysis and Identify Mitigation for VMT** Sonoma County shall require the following mitigation measures for cannabis project applications subject to a use permit or design review with hearing: Cannabis cultivation and supply chain sites that are located outside of VMT efficient areas, as identified in Table 3.14-3, shall conduct a project-level VMT analysis and identify VMT impacts associated with the cannabis facility. Consistent with this guidance, projects that include accessory uses would be analyzed independently. Where appropriate, VMT shall be evaluated using VMT screening maps based on the outputs from the most recent update of the Sonoma County Travel Demand Model or a dedicated model run.	Applicant to submit VMT analysis County to verify VMT analysis, additional requirements (if any), and final VMT analysis compliance	Study required prior to approval for UPC or DRH. Verify compliance during the permit process and prior to UPC or DRH approval.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	Please see Table 3.14-3 on page 3.14-17 of this Draft EIR. Because some projects may not be screened out based on these criteria, the process described below shall be applied to assess potential VMT impacts at the project level:			
Impact 3.14-2 (continued)	<u>Step 1 - Map-Based Low VMT Screening</u> The SCTA travel demand model analyzes geographic areas throughout the county known as transportation analysis zones (TAZs) and the VMT per employee is calculated for each TAZ. As shown in Figure 3.14-1, the VMT per employee is at least 15 percent below the county-wide average for a large portion of Sonoma County. Since incoming development is presumed to be associated with similar commuting patterns as existing conditions in the TAZ, individual cannabis projects proposed for sites in TAZs that have a VMT per employee at least 15 percent below the regional average are presumed to have a less-than-significant VMT impact. This screening criteria shall only be applied to projects that do not include cannabis events, as the SCTA model does not include data for events, or other types of visitor-focused uses. For employee-based projects not located in a TAZ with a VMT per employee at least 15 percent below the regional average, the analysis shall proceed to Step 2. <u>Step 2 - Proximity to Transit</u> In accordance with the screening criteria recommended by OPR, projects located within one-half mile of an existing major transit stop or an existing stop along a high-quality transit corridor shall be presumed to have a less than significant VMT impact, unless they meet at least one of the following: ▶ Have a Floor Area Ratio (FAR) of less than 0.75 ▶ Includes more parking for use by customers or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking) ▶ Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization) As in the case of map-based screening, projects that include cannabis events are not presumed to have a less than significant VMT impact and			

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	therefore could not be screened using this criterion, and must start at Step 3. Step 3 – Project VMT Assessment (if screening is not applicable) For projects that do not screen from VMT analysis, including those that propose events, the individual cannabis project must be compared with the appropriate VMT significance threshold. For employment-based land uses, the OPR-recommended threshold is 15 percent below the regional average; for projects in Sonoma County, the countywide average is typically used as regional. Projects that cannot reduce their VMT to a level that is at least 15 percent below the county-wide average are considered to have a significant VMT impact. For individual cannabis projects resulting in a significant VMT impact, a Transportation Demand Management (TDM) Program shall be developed that commits the project to VMT reduction measures that match their specific operation and geographic location in the county. These measures may include, but are not limited to the following: ▶ Implementation of an employee rideshare program ▶ Subsidies to employees for public transit use ▶ Provision of on-site bicycle storage and maintenance facilities ▶ Shuttle service for employees and customers for all cannabis events ▶ Participation in future Sonoma County VMT reduction programs The TDM will quantify the effectiveness of VMT reduction measures and their ability to reduce project VMT 15 percent below the county-wide average or why attainment of 15 percent reduction is not feasible to the satisfaction of the County prior to the issuance of occupancy permits or other approvals allowing for operation of the cannabis site.			
Tribal Cultural Resources				
Impact 3.15-1: Change the Significance of a Tribal Cultural Resource	Mitigation Measure 3.15-1a (ZPC): Protection of Tribal Cultural Resources for Permitted Uses The following measures would be included as standards in Section 26-18-115(C)(4)(h): ▶ The applicant must attest that they do not know of or have reason to believe that an archaeological tribal cultural resource is present within the cannabis premises.	Applicant to submit attestation and Sacred Lands Inventory Search results for ZPC	Required at time of application submittal	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	▶ The applicant must provide search results from the Sacred Lands Inventory maintained by the Native American Heritage Commission. The application cannot be approved if the search returns a positive result demonstrating that the project will impact a known archeological or tribal cultural resource. ▶ A referral must be sent to the Northwest Information Center. The application cannot be approved if the project will impact a known archaeological resource identified by the Northwest Information Center. ▶ A referral must be sent to the local tribes. The application cannot be approved if the project will affect a known tribal cultural resource as identified by a local tribe. Documentation must be provided by a local tribe to support a finding that a tribal cultural resource is present. The County must maintain the confidentiality of supporting documentation in accordance with California Government Code Sections 7927.000 and 7927.005. ▶ If requested by a local tribe, the applicant must retain a tribal cultural monitor, at the applicant's own cost, during crop removal and initial ground disturbing replanting activities. The retention of a tribal cultural monitor must be demonstrated through the submittal of an executed monitoring agreement prior to permit approval.	County to verify attestation, Sacred Lands Inventory search results, and Northwest Information Center search results for ZPC Applicant to retain a tribal cultural monitoring, if requested by a Tribe County to verify monitoring agreement	Verify compliance during the permit process and prior to ZPC approval. Required prior to ZPC approval. Verify compliance during the permit process and prior to ZPC approval.	
Impact 3.15-1 (continued)	**Mitigation Measure 3.15-1b (UPC and DRH): Implement Mitigation Measure 3.5-2a** ▶ Mitigation Measure 3.5-2a – (UPC and DRH) Cultural Resource Pre-Approval Evaluation	See above.	See above.	
Impact 3.15-1 (continued)	**Mitigation Measure 3.15-1c. (UPC and DRH) Tribal Cultural Resources Pre-Approval Consultation** The County shall send a project referral to all tribes that are traditionally and culturally affiliated with the area. A cultural resources survey report generated under Mitigation Measure 3.5-2a may be released only to those tribes who have requested consultation. If requested by a tribe, the County shall engage in consultation to identify potential impacts to tribal cultural resources. The information provided by tribes through consultation with the applicant shall be maintained as confidential in	County to send referrals to tribes and engage in consultation if requested	During the permit process and prior to UPC or DRH approval.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	accordance with California Government Code Sections 7927.000 and 7927.005 and all other applicable laws.			
Impact 3.15-1 (continued)	**Mitigation Measure 3.15-1d. (UPC and DRH) Avoidance of Tribal Cultural Resources** ▶ Cannabis project applications shall be designed to avoid impacts to tribal cultural resources identified by Mitigation Measure 3.5-2a and Mitigation Measure 3.15-1c. ▶ A barrier (temporary fencing) and flagging shall be placed between the work location and any resources within 60 feet of a work location to minimize the potential for inadvertent impacts. ▶ If the site is identified as potentially sensitive for tribal cultural resources under Mitigation Measure 3.5-2a or Mitigation Measure 3.15-1c, the applicant shall retain a qualified archeologist to prepare a tribal cultural resource treatment plan that shall be implemented in the event an unanticipated resource that may be considered a tribal cultural resource is identified during ground disturbance. The plan shall include any necessary monitoring requirements and suspension of all earth-disturbing work in the vicinity of the find. Avoidance of the resource is the preferred approach and wherever feasible the project shall be redesigned, subject to review and approval by the County, in consultation with the local tribe or tribes. If avoidance is infeasible, the plan shall outline the appropriate treatment of the resource in coordination and as agreed to by the local tribe or tribes and, if applicable, a qualified archeologist. Examples of appropriate treatment for the tribal cultural resources include, but are not limited to, protecting the cultural character and integrity of the resource, protecting traditional use of the resource, protecting the confidentiality of the resource, repatriation at a mutually agreed upon location, or returning the resources to the tribe. The plan shall be reviewed by the County and the local tribe or tribes prior to approval to confirm compliance with this measure. Following an unanticipated discovery, the County must verify project redesign or appropriate treatment of the resource, in consultation with the local tribe or tribes, prior to authorizing recommencement of ground disturbance.	Applicant to submit tribal cultural resource treatment plan, if required Applicant to retain a tribal cultural monitor, if required by plan County to verify compliance with plan submission, acceptance by local tribe(s), and any additional requirements	Plan required prior to UPC or DRH approval. Monitoring agreement required prior to initial ground-disturbing activities, or issuance of grading or building permits (whichever is first) for UPC or DRH. Verify plan during the permit process and prior to UPC or DRH approval. Verify treatment measures are implemented, monitoring agreement is in place, and exclusion fencing/ flagging prior to initial ground-disturbing activities, or issuance of grading or building permits (whichever is first) for UPC or DRH.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	▶ If the site is identified as potentially sensitive for tribal cultural resources under Mitigation Measure 3.5-2a or Mitigation Measure 3.15-1c, the applicant shall retain a tribal monitor to observe all ground disturbance, including archeological excavation. Monitoring methods and requirements shall be outlined in the tribal cultural resource treatment plan to mitigate impacts to the identified resource.			
Impact 3.15-1 (continued)	**Mitigation Measure 3.15-1e. (UPC and DRH) Avoidance of Human Remains** Impacts to human remains must be avoided. For a site where human remains are expected to be present based on the results of studies or consultation conducted under Mitigation Measure 3.5-2a or Mitigation Measure 3.15-1c, the County shall consult with the local tribe(s) on whether to employ a canine forensics team. If appropriate, the County shall require the use of a canine forensics team to attempt to identify the location of human remains in a noninvasive way for purpose of avoidance. Any requirements for the use of a canine forensics team shall be documented in a tribal cultural resources treatment plan prepared under Mitigation Measure 3.15-1d. The tribal cultural resources treatment plan may require revision or an addendum to reflect additional recommendations or requirements if human remains are present.	County to verify compliance with plan submission, acceptance by local tribe(s), and any additional requirements	If the County requires the use of canine forensics team, the application shall include the results of this activity and will be documented in the tribal cultural treatment plan identified in Mitigation Measure 3.15-1d prior to any action on the application. Verify treatment measures are implemented prior to initial ground-disturbing activities, or issuance of grading or building permits (whichever is first) for UPC or DRH.	
Utilities and Service Systems				
Impact 3.16-1: Result in Insufficient Water Supplies	**Mitigation Measure 3.16-1 (All Cannabis Uses): Municipal Water Supply Verification for New Cannabis Uses** The proposed Code Sections for all cannabis uses shall be modified to include the following standard. ▶ Individual projects must demonstrate that water demand would be equivalent or less than current levels of a facility or if the entity providing water can demonstrate that water is available to serve the project in normal, dry, and multiple dry years.	Applicant to submit proof of water supply County to verify compliance	Required at time of application submittal for by right uses, ZPC, UPC and DRH Verify compliance prior to approval for ZPC, UPC or DRH.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
Wildfire				
Impact 3.17-1: Expose People or Structures, Either Directly or Indirectly, to a Significant Risk of Loss, Injury, or Death Involving Wildland Fires	**Mitigation Measure 3.17-1a (UPC, DRH, and ZPC): Limitation of Use Types in Very High Fire Hazard Severity Zones** The following requirements shall be included as new performance standards in the County Cannabis Code for all parcels supporting a cannabis use within the Very High FHSZs in SRA or VHFHSZ in LRA. ▶ Only outdoor cultivation and accessory processing are allowed. ▶ Accessory processing activities conducted within structures are limited to storage, drying, and curing of cannabis. ▶ Defensible space and building hardening are required, consistent with the requirements set forth under Mitigation Measures 3.17-1b and 3.17-1c. ▶ No new extension of electricity power lines is allowed.	County to verify code standard added to code County to verify compliance	At program adoption Verify compliance during the permit process and prior to ZPC, UPC or DRH approval.	
Impact 3.17-1 (continued)	**Mitigation Measure 3.17-1b (ZPC, UPC and DRH): Require All Structures to Meet Defensible Space** The following requirements shall be included as conditions of approval for issuance of a use permit or approval under the design review with hearing processes. All structures irrespective of occupancy type shall meet the defensible space standards outlined below: ▶ 0 to 5 feet from a structure: ▪ Only hardscape materials (e.g., gravel, pavers, concrete) ▪ No dead or dying plants, weeds, or debris on roof, gutter, deck, porch stairways, or under structure ▪ Remove all branches within 10 feet of any chimney or stovepipe outlet. ▪ No combustible outdoor furniture or planters within decks or attached patios ▪ No stockpiling of firewood or lumber ▪ No attached fencing, gates, or arbors constructed with combustible materials ▶ 5-30 feet from a structure:	County to verify compliance	Verify compliance prior to building permit final or prior to operation (whichever is first) for ZPC, UPC or DRH.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	▪ Remove all dead plants, grass, and weeds ▪ Remove all dead or dry leaves ▪ Trim trees regularly to keep branches a minimum of 10 feet from other trees ▶ 30-100 feet from a structure: ▪ Cut or mow annual grass down to a maximum height of four inches. ▪ Create horizontal space between shrubs and trees. ▪ Create vertical space between grass, shrubs and trees. ▪ Remove fallen leaves, needles, twigs, bark, cones, and small branches greater than a depth of three inches. ▪ Keep 10 feet of clearance around exposed wood piles, down to bare mineral soil, in all directions. ▪ Clear areas around outbuildings and propane tanks. Keep 10 feet of clearance to bare mineral soil and no flammable vegetation for an additional 10 feet around their exterior.			
Impact 3.17-1 (continued)	**Mitigation Measure 3.17-1c (UPC and DRH): Require All Structures to Be Constructed with Noncombustible Materials** The following requirements shall be included as conditions of approval for issuance of a use permit or approval under the design review with hearing processes for all cannabis uses within the unincorporated County, including both the SRA and LRA. ▶ The facility would be subject to an annual inspection by either the local fire district or the County Fire Division. ▶ Building materials, including siding, decks, doors, and trim, shall consist of noncombustible material, as listed on the State Fire Marshal's Building Materials Listing Program. ▶ Roofs shall be constructed with noncombustible or ignition resistant materials, and must meet Class A fire rating. ▶ Vents must prevent intrusion of embers and flame (i.e., ember-resistant vents). ▶ Windows shall be dual paned tempered glass and constructed with fire-resistant materials.	County to verify compliance	Verify compliance prior to building permit final or prior to operation (whichever is first) for UPC or DRH.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	▶ Parking areas shall be designated and consist of noncombustible materials (e.g., poured concrete or gravel). ▶ Vegetation shall not be permitted within 10 feet of power poles. ▶ Gutters and downspouts shall be noncombustible, and cleared of debris on a monthly basis. ▶ No solid wood fencing shall be constructed. ▶ A minimum of 30 feet between structures shall be maintained.			
Impact 3.17-1 (continued)	**Mitigation Measure 3.17-1d (UPC and DRH): Develop and Implement Site-Specific Fire Protection and Prevention Plan** Applicant must prepare a Fire Protection and Prevention Plan that includes site-specific and detailed plans to address increased wildfire risk at the cannabis site. The Fire Protection and Prevention Plan will be subject to review and approval by the County Fire Marshal and the fire district with jurisdiction over the cannabis site before issuance of a permit by the County. The County Fire Marshal shall use the Fire Protection and Prevention Plan to establish conditions of approval for the site that will be incorporated into requirements for issuance of a use permit or design review approval. The site-specific Fire Protection and Prevention Plan shall include the following minimum components. Additional requirements and inspections may be included in the plan at the discretion of the County Fire Marshal or local fire district. ▶ Verification that Mitigation Measures 3.17-1a, 3.17-1b, and 3.17-1c are feasible and incorporated into project plans. ▶ Verification that the cannabis site is located within a fire district with adequate capacity to serve the site in the event of unintended fire ignition. ▶ Identification of emergency response and evacuation routes. Unless the site is located along a State or federal Highway, a street identified by the County as an arterial or collector, or as otherwise directed by the County Fire Marshal, the adequacy of emergency response shall be determined based on modeling prepared by a traffic engineer that takes into account expected numbers of workers and total estimated amount of operational traffic, the capacity of roadways near the facility, reasonably foreseeable wildfire scenarios, evacuation	Applicant to submit plan County to verify draft plan compliance with minimum requirements, recommend additional requirements (if necessary), and approve final plan	Plan required prior to UPC or DRH approval. Verify compliance during the permit process and prior to UPC or DRH approval.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	time, and emergency response time. Minimum response objectives shall be evaluated and approved by the local fire district or the County. Unless otherwise established by the County or the local fire district, emergency response standards established by the National Fire Protection Association shall be used to determine if emergency response time of the associated fire district is adequate. ▶ Defined staff roles and responsibilities, including staff responsible for communicating with emergency service providers. Communication protocols must also be included to ensure that staff, customers, and vendors are informed of potential emergencies and needed actions due to an emergency, up to and including evacuation of the site. ▶ Verification that roadway conditions are consistent with all applicable requirements. ▶ Verification that all roads leading up to the individual site and buildings on the site are designated by names or numbers posted on signs clearly visible and legible from the roadway and at interchanges. ▶ Identification of emergency water supply that is available, accessible, and maintained in quantities and locations specified consistent with all applicable requirements. ▶ Verification that areawide fuel breaks are sufficient and in compliance all applicable requirements. ▶ Confirmation that roadways are in compliance with the State and local roadway standards. ▶ Identification of operational requirements, including the following: ▶ Mowing shall occur before 10 a.m. and never on a hot or windy day, or a red flag warning or a particularly dangerous situation event issued by the National Weather Service. ▶ String trimmers shall be used rather than lawnmowers for clearing vegetation wherever feasible. ▶ All dead or dying vegetation shall be removed during drought conditions when water use restrictions are in place.			
Impact 3.17-1 (continued)	**Mitigation Measure 3.17-1e (UPC and DRH): Implement Site-Specific Standards for Events**			

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
	Standards for cannabis events shall be established to meet the requirements of a specific site. These standards must be developed by the applicant, subject to review and approval by the County Fire Marshal and the local fire district. Requirements for events shall be incorporated into the conditions for approval of a use permit and include the following, at minimum. ▶ Standards for water application at the perimeter of the event. ▶ Designated smoking areas where incendiaries devices may be used. Such smoking areas must consist of noncombustible materials (e.g., poured concrete or gravel). ▶ Installation and maintenance of fire extinguishers. ▶ Access to adequate water supply for fire suppression (e.g., hoses, reservoirs, pumps or water tanks). ▶ Installation of sprinkler systems in strategic locations to address potential ignition sources. ▶ The pertinent emergency evacuation zone, map of the site that clearly shows nearby roadways, and shelter-in-place locations on the subject property shall be posted in a conspicuous location within the cannabis facility or event location.	Applicant to submit proposed standards for events County to verify compliance with minimum requirements, recommend additional requirements (if necessary), and approve final standards	Required prior to UPC or DRH approval. Verify compliance during the permit process and prior to UPC or DRH approval.	
Impact 3.17-2: Substantially Impair an Adopted Emergency Response Plan, Emergency Access, or Emergency Evacuation Plan in Areas in or Near SRAs or Land Classified as Very High Fire Hazard Severity Zones	**Mitigation Measure 3.17-1a: Require All Structures to Meet Defensible Space Parameter** **Mitigation Measure 3.17-1b: Require All Structures to Be Constructed with Noncombustible Materials** **Mitigation Measure 3.17-1c: Ensure Roadways Comply with Board of Forestry State Minimum Fire Safe Regulations** **Mitigation Measure 3.17-1d: Minimize Wildfire/Ignition Risk during Operations** **Mitigation Measure 3.17-1e: Minimize Ignition Risk during Events**	See above.	See above.	
Impact 3.17-4: Require the Installation or Maintenance of Associated Infrastructure (such as Roads, Fuel Breaks, Emergency Water Sources) That May Exacerbate Fire Risk or That May	**Mitigation Measure 3.17-1a: Require All Structures to Meet Defensible Space Parameter** **Mitigation Measure 3.17-1b: Require All Structures to Be Constructed with Noncombustible Materials**	See above.	See above.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis

Impact	Mitigation Measures	Implementation Responsibility	Time Frame / Monitoring Milestone	Verification
Result in Temporary or Ongoing Impacts to the Environment	Mitigation Measure 3.17-1c: Ensure Roadways Comply with Board of Forestry State Minimum Fire Safe Regulations Mitigation Measure 3.17-1d: Minimize Wildfire/Ignition Risk during Operations Mitigation Measure 3.17-1e: Minimize Ignition Risk during Events			
Impact 3.17-5: 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	Mitigation Measure 3.17-1a: Require All Structures to Meet Defensible Space Parameter Mitigation Measure 3.17-1b: Require All Structures to Be Constructed with Noncombustible Materials Mitigation Measure 3.17-1c: Ensure Roadways Comply with Board of Forestry State Minimum Fire Safe Regulations Mitigation Measure 3.17-1d: Minimize Wildfire/Ignition Risk during Operations Mitigation Measure 3.17-1e: Minimize Ignition Risk during Events	See above.	See above.	

Notes: ZPC: Zoning Permit for Cannabis; DRH: Design Review with Hearing; UPC: Use Permit for cannabis