

PUBLIC REVIEW DRAFT
INITIAL STUDY/
MITIGATED NEGATIVE DECLARATION

FOR THE
HAYFORK CANNABIS MANUFACTURING PROJECT
3001 Morgan Hill Road, Hayfork, CA

April 24, 2019

Prepared for:

TRINITY COUNTY
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LIST OF ACRONYMS AND ABBREVIATIONS USED IN THIS DOCUMENT

AB	Assembly Bill
BAAQMD	Bay Area Air Quality Management District
BCC	Bureau of Cannabis Control
CalEEMod	California Emissions Estimator Model
CalFire	California Department of Forestry and Fire Protection
CalRecycle	California Department of Resources Recycling and Recovery
CBD	cannabidiol
CDFA	California Department of Food and Agriculture
CDPH	California Department of Public Health
CEQA	California Environmental Quality Act
CNEL	Community Noise Equivalent Level
CO _{2e}	carbon dioxide equivalent
CUPA	Certified Unified Program Agency
dB	decibel
dBA	decibel, A-weighted
DTSC	Department of Toxic Substances Control
FEMA	Federal Emergency Management Agency
GHG	greenhouse gas
IS/MND	Initial Study/Mitigated Negative Declaration
L _{dn}	Day-Night Average Level
L _{eq}	equivalent continuous sound level
LOS	Level of Service
MAUCRSA	Medicinal and Adult-Use Cannabis Regulation and Safety Act
MCRSA	Medical Cannabis Regulation and Safety Act
NCUAQMD	North Coast Unified Air Quality Management District
PEIR	Program Environmental Impact Report
PM ₁₀	particulate matter 10 micrometers or less in diameter
PM _{2.5}	particulate matter 2.5 micrometers or less in diameter
PUD	(Trinity) Public Utilities District
RWQCB	Regional Water Quality Control Board
RTP	Regional Transportation Plan
SB	Senate Bill
SUD	Specific Unit Development
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board

DETERMINATION

Determination (To be completed by the Lead Agency):

On the basis of the initial evaluation:

- ☐ I find that the proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.
- ☒ I find that, although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared.
- ☐ I find that the proposed project **MAY** have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.
- ☐ I find that the proposed project **MAY** have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment because all potentially significant effects (a) have been analyzed adequately in an earlier **EIR** or **NEGATIVE DECLARATION** pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier **EIR** or **NEGATIVE DECLARATION**, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Copies of the Initial Study and related materials and documentation may be obtained at the Trinity County Planning, 61 Airport Road, Weaverville, CA 96093. Contact Leslie Hubbard, Deputy Director of Planning, (530) 623-1351 ext. 3.



Leslie Hubbard, Deputy Director of Planning
Trinity County Planning Department

4/23/19

Date

1.0 INTRODUCTION

1.1 Project Brief

This document is an Initial Study/Mitigated Negative Declaration (IS/MND) for the Hayfork Cannabis Manufacturing Project (project). The project is at 3001 Morgan Hill Road in the community of Hayfork, Trinity County, California (Figures 1-1 through 1-5). The IS/MND has been prepared in compliance with the requirements of the California Environmental Quality Act (CEQA). For the purposes of this CEQA analysis, Trinity County (County) is the Lead Agency for the project.

The project proposes to establish a cannabis manufacturing operation that would extract cannabinal from legally grown and harvested cannabis plants using a hydrocarbon extraction process. The extract would be sold wholesale to other manufacturers who would use it in the manufacture of retail cannabis products. The proposed operation may also produce some retail products, as discussed in Section 2.0. The proposed manufacturing operation would occur within a new specially-equipped steel container designed to minimize safety risks. The container would be located within a new, larger steel building which would be used for packaging and product storage. The manufacturing operation would require a Type 7 license from the State of California (State) and a Conditional Use Permit from the County. The proposed manufacturing use is not allowed under the existing zoning for the project site (A10, Agriculture District), so the project would also require a rezoning of the site to Specific Unit Development (SUD).

“Distribution” of cannabis and cannabis products is integral to the proposed project. Distribution involves a variety of manufacturing-related activities including purchase of raw material, lateral sales and retail sales. Distribution activities involve transportation of raw material to the manufacturing facility and of wholesale and retail cannabis products to other licensed cannabis facilities. Distribution activities require a Type 11 license from the State and also require a Conditional Use Permit from the County. The transportation effects of the project are addressed in the Transportation section of Chapter 3.0 Environmental Impacts and Mitigation Measures.

The project includes establishing a commercial cannabis nursery that would be located in four of the existing greenhouses on the site. Together, the greenhouses would accommodate 4,608 square feet of cannabis canopy. The nursery would require a Type 4 license from the State and a Conditional Use Permit from the County.

Although not currently allowed at this site according to County Code, the applicant intends to expand the existing cannabis cultivation operation from its current canopy of 10,000 square feet, which is being accommodated in a new single 12,600 square foot greenhouse, to 43,560-square feet (one acre) of canopy as future changes in County Code allow. Initially, one Type 2b license would be pursued for this expansion, followed by application for three additional Type 2b licenses if the County cannabis ordinances are modified to allow-for additional licenses on the same site. All new cannabis cultivation would occur in

outdoor planting beds that would accommodate 30,000 square feet of cannabis canopy in addition to the existing permitted canopy; the outdoor beds would later be replaced by greenhouses accommodating the same canopy area. The new 12,600 square foot greenhouse, which accommodates 10,000 square feet in canopy area, is being constructed to replace a permitted duplex greenhouse that was damaged by Winter 2018-2019 snowfall. A warehouse approximately 3,600 square feet in floor area would be constructed adjacent to the proposed greenhouse and would provide storage space for cultivation and harvesting activities, product storage and restrooms for employees. In addition to the State licenses, the expanded cultivation operation would require Conditional Use Permits from the County. An assessment of the consistency of portions of the existing cannabis cultivation activities on the project site, including consideration of environmental impacts as set forth in the CalCannabis Cultivation Licensing Program Environmental Impact Report (PEIR), was conducted by Natural Investigations Company in January 2018. The assessment is Appendix A of this IS/MND and is cited throughout this document.

1.2 Purpose of Initial Study

CEQA requires that public agencies document and consider the potential environmental effects of the agency's actions that meet CEQA's definition of a "project." Briefly summarized, a "project" is an action that has the potential to result in direct or indirect physical changes in the environment. A project includes the agency's direct activities as well as activities that involve public agency approvals or funding. Guidelines for an agency's implementation of CEQA are found in the "CEQA Guidelines" (Title 14, Chapter 3 of the California Code of Regulations).

Provided that a project is not exempt from CEQA, the first step in the agency's consideration of its potential environmental effects is the preparation of an Initial Study. The purpose of an Initial Study is to determine whether the project would involve "significant" environmental effects, as defined by CEQA, and to describe feasible mitigation measures that would avoid significant effects or reduce them to a level that is less than significant. If the Initial Study does not identify significant effects, then the agency prepares a Negative Declaration. If the Initial Study notes significant effects but also identifies mitigation measures that would reduce these significant effects to a level that is less than significant, then the agency prepares a Mitigated Negative Declaration. If a project would involve significant effects that cannot be readily mitigated, then the agency must prepare an Environmental Impact Report. The agency may also decide to proceed directly with the preparation of an Environmental Impact Report without an Initial Study.

The proposed project is a "project" as defined by CEQA and is not exempt from CEQA consideration. The County has determined that the project may potentially have significant environmental effects and therefore would require preparation of an Initial Study. This Initial Study describes the proposed project and its environmental setting, discusses the potential environmental effects of the project, and identifies feasible mitigation measures that would eliminate any potentially significant environmental effects of the project or reduce them to a level that would be less than significant. The Initial Study considers the project's potential for significant environmental effects in the following subject areas:

- Aesthetics
- Agricultural Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation/Traffic
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire
- Mandatory Findings of Significance (including Cumulative Impacts)

This Initial Study concludes that the project would have potentially significant environmental effects, all of which would be avoided or reduced to a level that would be less than significant with recommended mitigation measures. The project applicant has accepted all the recommended mitigation measures. As a result, the County has prepared a Mitigated Negative Declaration and has issued a Notice of Intent to adopt the IS/MND for the project. The time available for public comment on the IS/MND is shown on the Notice of Intent.

1.3 Project Background

State Regulatory Framework

Until 1996, the cultivation, use, and sale of cannabis (also known as marijuana) for any purpose was illegal in the State of California. In 1996, California voters approved Proposition 215, which allowed seriously ill Californians the right to obtain and use cannabis for medical purposes when recommended by a physician. In 2015, the State Legislature enacted the Medical Cannabis Regulation and Safety Act (MCRSA), which mandated a comprehensive State licensure and regulatory framework for cultivation, manufacturing, distribution, transportation, testing, and dispensing of medical cannabis on a commercial basis.

As the State was drafting regulations in compliance with MCRSA, California voters in 2016 approved Proposition 64, which legalized the use and possession of non-medicinal cannabis products within California by adults age 21 years and older. In June 2017, the State Legislature passed a budget trailer bill, Senate Bill (SB) 94, that repealed MCRSA and integrated its medicinal licensing requirements with Proposition 64 to create the Medicinal and Adult-Use Cannabis Regulation and Safety Act (MAUCRSA). MAUCRSA provides the regulatory structure for commercial cannabis activities in California.

MAUCRSA designates applicable responsibilities for oversight of cannabis commerce in California to several State agencies. The Bureau of Cannabis Control (BCC) is the lead agency in regulating commercial cannabis licenses for retailers, distributors, testing labs, and microbusinesses involved with medical and adult-use cannabis. CalCannabis

Cultivation Licensing, a division of the California Department of Food and Agriculture (CDFA), licenses and regulates commercial cannabis cultivators and manages the State's "track-and-trace" system that tracks cannabis and its products from cultivation to sale. The Manufactured Cannabis Safety Branch of the California Department of Public Health (CDPH) is responsible for regulation of commercial cannabis manufacturing. In accordance with MAUCRSA, all three agencies have adopted emergency regulations related to their respective responsibilities, and all three have drafted permanent regulations that are currently undergoing the State rulemaking process.

It is important to note that, although California allows medicinal and adult use, cannabis remains classified as a Schedule 1 controlled substance under the federal Controlled Substances Act of 1970. Individuals engaging in cultivation and other cannabis-related activities risk prosecution under federal law.

Local Conditions

Trinity County occupies an area of about 2.053 million acres (3,208 square miles) in northwestern California. Of the total acreage, about 75% is owned and managed by federal agencies such as the U.S. Forest Service, the Bureau of Reclamation, and the Bureau of Land Management. The remaining lands are mostly privately-owned properties under the land use authority of the County. Lands in private ownership are located mainly along the primary waterways and in adjacent valleys (Trinity County 2017a).

Trinity County has a history as a cannabis-producing region. The County's geographic and climatic conditions, low population density, and availability of resource lands previously utilized for forestry and grazing have attracted an influx of individuals for the purpose of participating in cannabis activity (Trinity County 2017b). Since 2016, the County has issued approximately 425 cultivation licenses. Currently, there are approximately 250 active licensed sites and another 100 in the licensing process. It is estimated that more than 3,500 un-permitted cultivation operations exist on private land in the County, and 10-20 illegal trespass grows on public lands. The Hayfork Valley is one area of the County where cannabis cultivation is concentrated (Trinity County 2018a).

Trinity County has enacted several ordinances that apply to various aspects of commercial cannabis:

Ordinance No. 315-823 created regulations on commercial cannabis cultivation, including the designation of several zoning districts as appropriate locations for licensed cultivation without encumbrances. The total amount of land within these designated zoning districts is approximately 187,782 acres, with another 11,989 acres encumbered by ordinance provisions (Trinity County 2017a). The license types for cannabis cultivation, described in the CDFA regulations, that are allowed by the County at this time are the following:

- "Specialty Cottage Outdoor" – for outdoor cultivation up to 25 mature plants.
- "Specialty Cottage Indoor" – for indoor cultivation with 500 square feet or less of total canopy.

- “Specialty Cottage Mixed-Light Tier 1 and 2” – for cultivation using mixed light (i.e., sunlight and artificial light) with 2,500 square feet or less of total canopy. “Tier 1” means the use of artificial light at a rate of six watts or less per square foot, and “Tier 2” means the use of artificial light at a rate greater than six watts but no greater than 25 watts per square foot.
- “Specialty Outdoor” – for outdoor cultivation less than or equal to 5,000 square feet of total canopy, or up to 50 mature plants on noncontiguous plots.
- “Specialty Mixed-Light Tier 1 and 2” – for cultivation using mixed light between 2,501 and 5,000 square feet of total canopy.
- “Small Outdoor” – for outdoor cultivation between 5,001 and 10,000 square feet of total canopy.
- “Small Mixed-Light Tier 1 and 2” – for cultivation using mixed light between 5,001 and 10,000 square feet of total canopy.
- “Medium Outdoor” – for outdoor cultivation between 10,001 square feet and one acre in total canopy.

Subsequent amendments to this ordinance include Ordinance No. 315-829, which sets conditions for license transfers and limits the number of Type 3 licenses to be issued in the County; Ordinance No. 315-830, which sets additional license application requirements; Ordinance No. 315-841, which requires a State license for “self-transport” to be obtained within 90 days of a County license; and Ordinance No. 315-843, which consolidates requirements set forth in the original ordinance and amendments.

Ordinance No. 315-826 allows for wholesale cannabis nurseries and resale of auxiliary nursery products. It sets forth locational and other requirements for nurseries, and it applies conditions to be attached to use permits. All cannabis nurseries require a Type 4 State license, as described in the BCC regulations. This ordinance was amended by Ordinance No. 315-827, which expands on the requirements and conditions of the original ordinance; and Ordinance No. 315-833, which further clarified the zones in which nurseries may be permitted.

Ordinance No. 315-828 regulates cannabis distribution. “Distribution,” as defined in the ordinance, means the procurement, sale, and transport of cannabis and cannabis products between entities that are properly licensed. Locational and other regulations for distribution facilities are specified. Distribution activities require a Type 11 State license, as described in the BCC regulations. This ordinance was amended by Ordinance No. 315-834, which changed the allowable zoning districts for distribution facilities and locations for Transportation Only licenses.

Ordinance No. 315-838, enacted on August 7, 2018, sets conditions for commercial cannabis manufacturing in the County. The license types for cannabis manufacturing, described in the CDPH regulations, that are allowed by the County at this time are the following:

- Type 6 – extractions using non-volatile solvents or mechanical methods.
- Type 7 – extractions using volatile substances.
- Type N – infusions, including using pre-extracted oils to create edibles, beverages, capsules, water cartridges, tinctures, or topicals.
- Type P – packaging and labeling only.

This ordinance was subsequently amended by Ordinance No. 315-842, which expanded on the regulations and conditions specified in the original ordinance.

Other County ordinances that address cannabis issues include Ordinance No. 315-835, which regulates non-storefront cannabis retailers; and Ordinance No. 315-837, which regulates “microbusinesses” (i.e., businesses that cultivate cannabis on an area less than 10,000 square feet). Neither of these ordinances apply to the proposed project.

Existing Site Conditions

The project applicant conducts an existing cannabis cultivation operation, licensed by the State and permitted by the County, on the proposed project site. Cannabis is cultivated exclusively in five secured greenhouses, each 1,152 square feet in size. There also was one duplex greenhouse, approximately 9,360 square feet in size, where cultivation occurred, but this greenhouse was damaged during Winter 2018-2019 and subsequently demolished. Two Conex boxes, steel intermodal shipping containers located on both sides of an existing garage, are used for product drying. The garage building (24 feet by 40 feet) and a shed are used for nutrient and material storage. Cannabis plant residues are chipped/ground and composted in a vermicomposting facility housed in the 30x120 foot building adjacent to the 12,600 square foot greenhouse that is being constructed. Water is provided by an on-site groundwater well, and five water tanks, each with a capacity of 300 gallons, are located on the site. The site also has a 1,000-gallon propane tank, two tanks each with a capacity of 1,100 gallons, and one tank with a capacity of 2,500 gallons.

Other features of the site include a pond in the northern portion of the project site. The pond is used to collect rainwater. Near the pond to the southwest is one of the greenhouses used for cannabis cultivation. Also near the pond are a storage shed with a floor area of 14 feet by 24 feet, and a geodesic dome with a diameter of 24 feet. Neither structure is used in existing on-site cannabis operations. The existing pond is not used in connection with existing or proposed cannabis uses. Refer to Figure 2-1 in Chapter 2.0, Project Description, for location of existing facilities.

1.4 Environmental Evaluation Checklist Terminology

The project’s potential environmental effects are evaluated in the Environmental Evaluation Checklist presented in Chapter 3.0 of this IS/MND. The checklist includes a list of environmental considerations against which the project is evaluated. For each question, the City determines whether the project would involve 1) a Potentially Significant

Impact, 2) a Less Than Significant Impact with Mitigation Incorporated, 3) a Less Than Significant Impact, or 4) No Impact.

A Potentially Significant Impact occurs when there is substantial evidence that the project would involve a substantial adverse change to the physical environment, i.e., the environmental effect may be significant, and mitigation measures have not been defined that would reduce the impact to a level that would be less than significant. If there is a Potentially Significant Impact entry in the Initial Study, then an EIR is required.

An environmental effect that is Less Than Significant with Mitigation Incorporated is a Potentially Significant Impact that can be avoided or reduced to a level that is less than significant with the application of defined mitigation measures.

A Less Than Significant Impact occurs when the project would involve an environmental impact, but the impact would not cause a substantial adverse change to the physical environment that would require mitigation.

A determination of No Impact is self-explanatory.

This IS/MND identifies several potentially significant environmental effects related to the project. Some effects are mitigated by implementation of existing provisions of law and standards of practice related to environmental protection. Such provisions are considered in the environmental impact analysis, and the degree to which they would reduce potential environmental effects is discussed. Additional mitigation measures are specifically identified when necessary to avoid potential environmental effects or to reduce them to a level that is less than significant.

1.5 Summary of Environmental Effects and Mitigation Measures

Table 1-1, which follows Figures 1-1 through 1-5, summarizes the results of the Environmental Evaluation Checklist and associated narrative discussion in Chapter 3.0 of this IS/MND. The potential environmental impacts of the proposed project are listed in the left-most column of this table. The level of significance of each impact is indicated in the second column. Mitigation measures proposed to avoid or minimize the impacts are shown in the third column, and the significance of the impact after mitigation measures are applied is shown in the fourth column.

As previously noted, all potentially significant environmental effects identified in the IS/MND would be avoided or reduced to a level that would be less than significant with recommended mitigation measures. For all other issues, the project would have no impact or would have impacts that are less than significant.

1.6 Project Environmental Studies

As part of the preparation of this Initial Study, the following study, which is included in Appendix A of this IS/MND, was utilized to develop baseline information and project-

related impact discussions. This study is available for inspection at the Trinity County Planning Department, 61 Airport Road Weaverville, California 96093, during normal business hours (8:00 AM to 5:00 PM Monday through Friday).

- Natural Investigations Company. CDFA CalCannabis Cultivation Licensing PEIR Tiering Checklist for the Cannabis Cultivation Operation at 3001 Morgan Hill Road, Hayfork, CA. January 17, 2018.

Information contained in the cultural resources documentation related to the specific location of prehistoric and historic sites is confidential and exempt from the Freedom of Information Act (FOIA) and the California Public Records Act (CPRA); therefore, this information is not included in Appendix A. Professionally qualified individuals, as determined by the California Office of Historic Preservation, may contact the Trinity County Planning Department directly in order to inquire about its availability.

1.7 Review Process

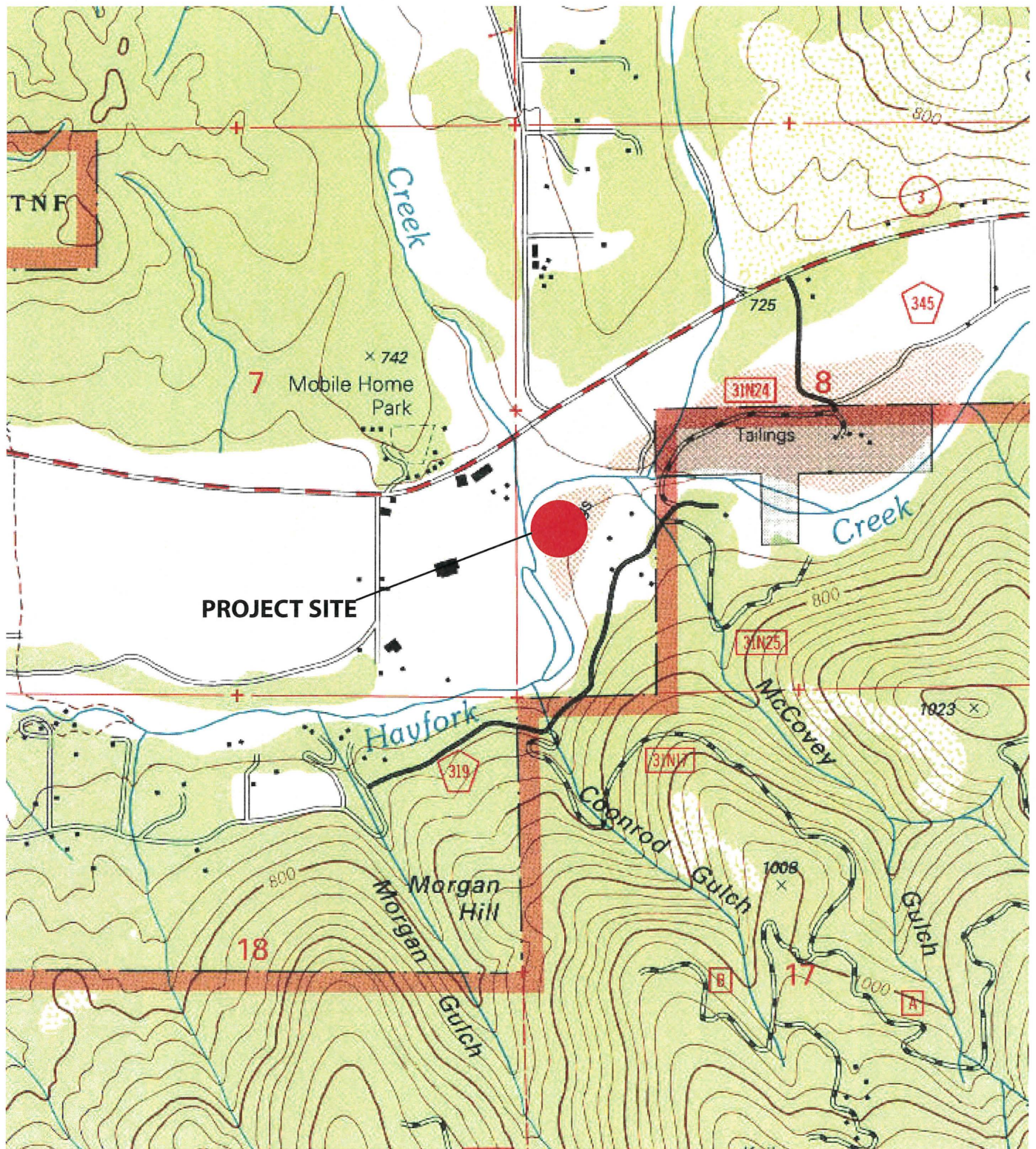
This Initial Study is being circulated for public and agency review as required by CEQA. Because State agencies will act as responsible or trustee agencies, the County will circulate the Initial Study to the State Clearinghouse of the Governor's Office of Planning and Research for distribution and a 30-day review period. During the review period, written comments may be submitted to:

TRINITY COUNTY
Department of Planning
61 Airport Road
Weaverville, CA 96093

Ruth Hanover, Administrative Coordinator
ruhanover@trinitycounty.org
(530) 623-1351 ext. 4

and

Leslie Hubbard, Deputy Director of Planning
lhubbard@trinitycounty.org
(530) 623-1351 ext. 3



SOURCE: Hayfork Quadrangle, California, Trinity County, 1998

Provided by:

PARCELQUEST

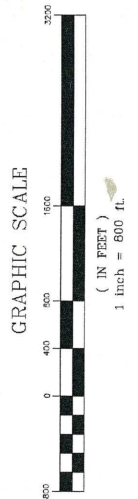
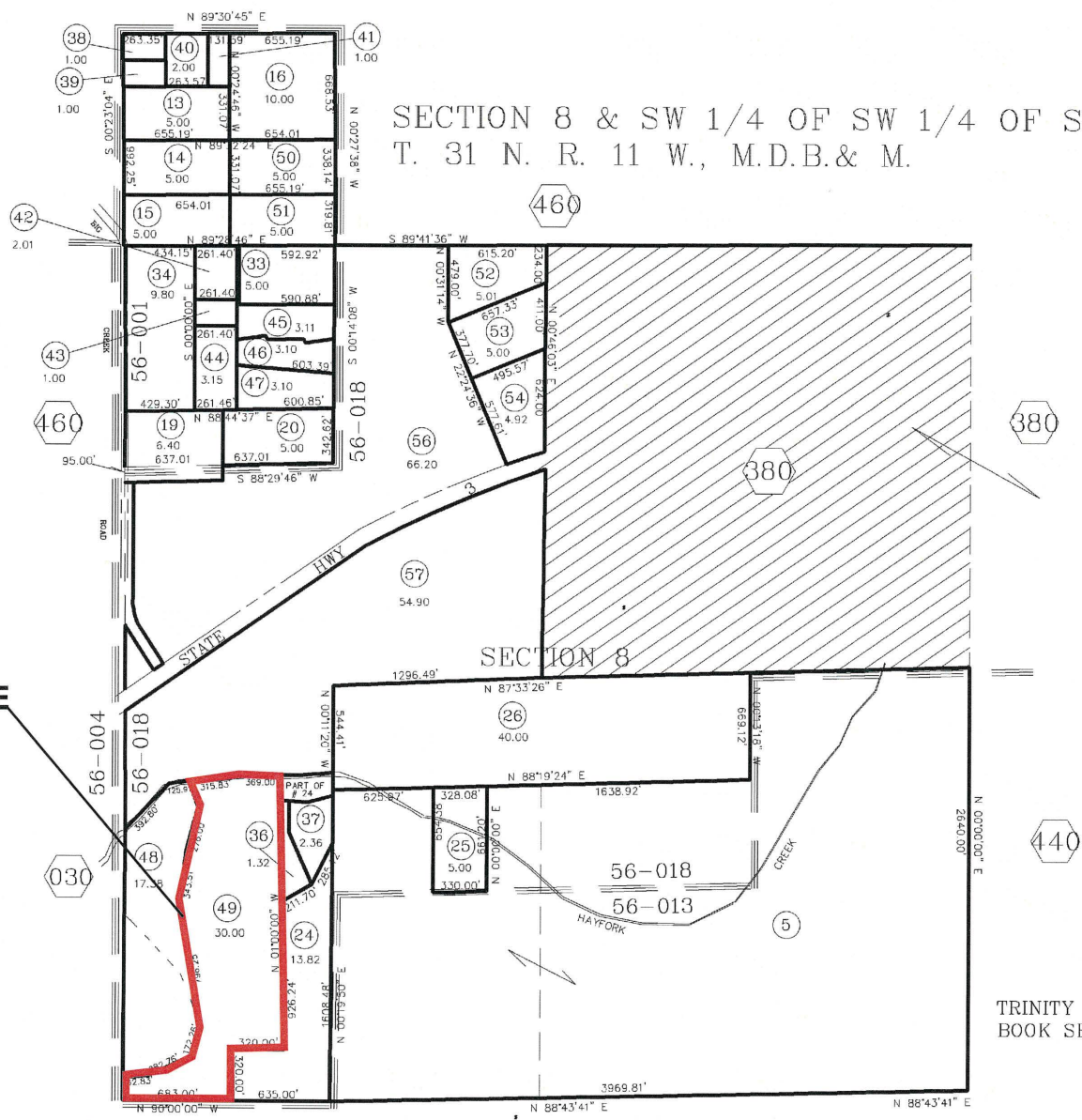
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56-001
 56-013
 56-018

SECTION 8 & SW 1/4 OF SW 1/4 OF SECTION 5
 T. 31 N. R. 11 W., M.D.B. & M.

- MAPS OF RECORD:
- 7/155
 - 8/100
 - 8/179
 - 10/182
 - 12/5
 - 12/38
 - 12/102

PROJECT SITE



ALTHOUGH BASED IN WHOLE OR IN PART ON
 RECORDED INFORMATION, THIS MAP IS NOT A
 RECORD OF SURVEY AND ITS USE IS
 FOR ASSESSMENT PURPOSES ONLY.

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APRIL 4, 2007
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Figure 1-4
 ASSESSOR PARCEL MAP

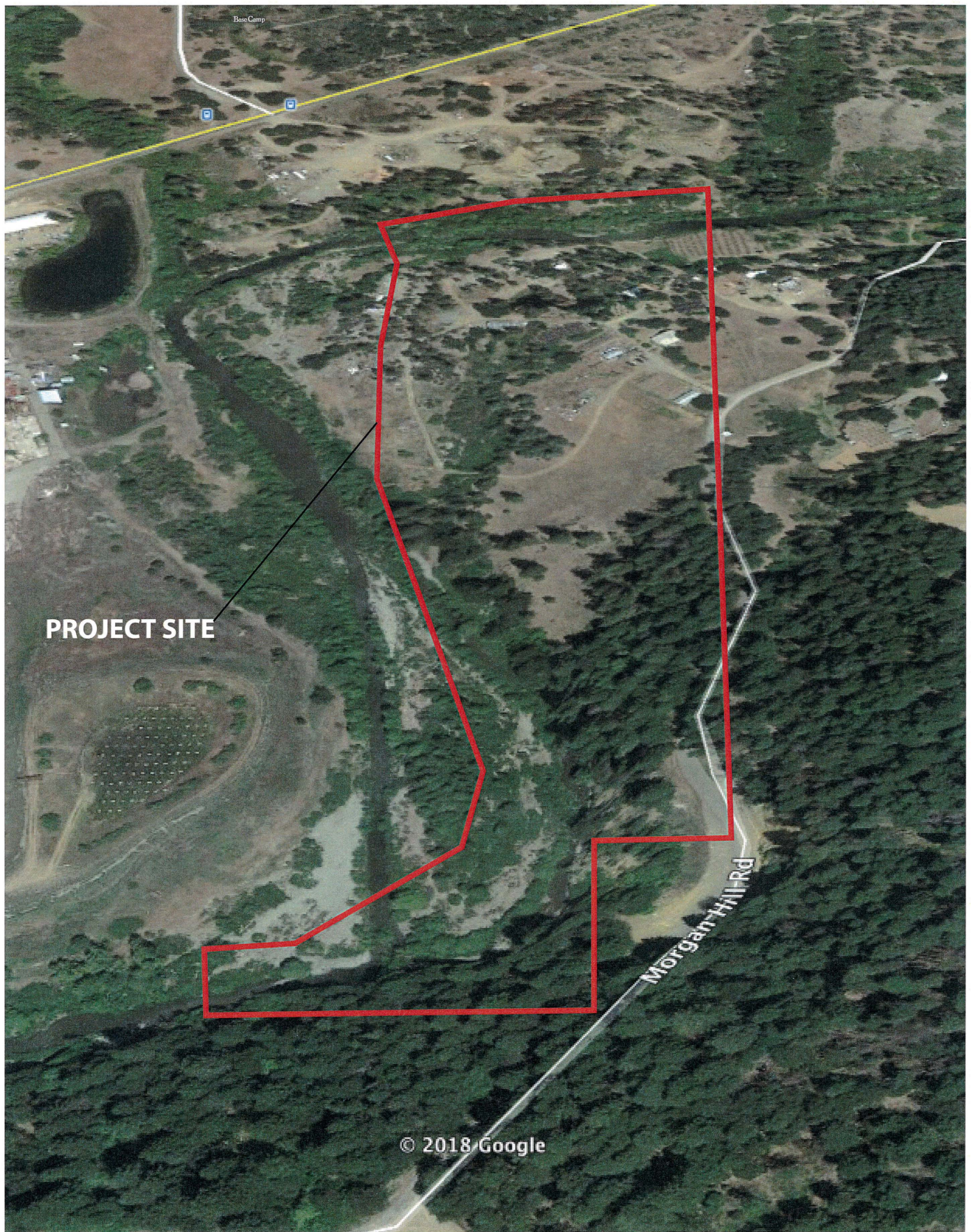


TABLE 1-1
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Potential Impact	Significance Before Mitigation Measures	Mitigation Measures	Significance After Mitigation Measures
3.1 AESTHETICS			
a) Scenic Vistas	NI	None required.	-
b) Scenic Routes and Resources	NI	None required.	-
c) Visual Character and Quality	LS	None required.	-
d) Light and Glare	LS	None required.	-
3.2 AGRICULTURE AND FORESTRY RESOURCES			
a) Agricultural Land Conversion	NI	None required.	-
b) Agricultural Zoning and Williamson Act	LS	None required.	-
c) Forest Land Zoning	NI	None required.	-
d) Forest Land Conversion	NI	None required.	-
e) Indirect Conversion of Farmland and Forest Land	NI	None required.	-
3.3 AIR QUALITY			
a) Air Quality Plan Consistency	NI	None required.	-
b) Cumulative Emissions	NI	None required.	-
c) Exposure of Sensitive Receptors	LS	None required.	-
d) Odors	LS	None required.	-

TABLE 1-1
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Potential Impact	Significance Before Mitigation Measures	Mitigation Measures	Significance After Mitigation Measures
3.4 BIOLOGICAL RESOURCES			
a) Special-Status Species	NI	None required.	-
b) Riparian and Other Sensitive Habitats	NI	None required.	-
c) Wetlands and Waters of the U.S.	NI	None required.	-
d) Fish and Wildlife Movement	PS	BIO-1: If tree removal is proposed during the general avian nesting season (February 1 through August 31), then a pre-construction survey for nesting birds shall be conducted by a qualified biologist within 14 days of proposed construction. If active nests are found, then removal of the tree with the nest shall be delayed until the young have fledged. No further mitigation shall be implemented if no active bird nests are found, and no mitigation need be implemented if tree removal occurs outside the nesting season.	LS
e) Local Biological Requirements	LS	None required.	-
f) Conflict with Habitat Conservation Plans	NI	None required.	-
3.5 CULTURAL RESOURCES			
a) Historical Resources	NI	None required.	-
b) Archaeological Resources	PS	CULT-1: If any subsurface cultural or paleontological resources are encountered during project construction, all activities shall be halted within 50 feet of the discovery until a qualified archaeologist or paleontologist, as appropriate, can examine these materials, determine their significance and, if significant, recommend mitigation measures that would reduce potential effects to a level that is less than significant. Such measures could include 1)	LS

TABLE 1-1
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Potential Impact	Significance Before Mitigation Measures	Mitigation Measures	Significance After Mitigation Measures
		preservation in place or 2) excavation, recovery and curation by qualified professionals. The project applicant shall be responsible for retaining qualified professionals, implementing recommended mitigation measures, and documenting mitigation efforts in a written report, consistent with the requirements of the CEQA Guidelines.	
c) Human Burials	LS	None required.	-
3.6 ENERGY			
a, b) Project Energy Consumption and Consistency with Energy Plans	LS	None required.	-
3.7 GEOLOGY AND SOILS			
a-i) Fault Rupture Hazards	NI	None required.	-
a-ii) Seismic Ground Shaking	LS	None required.	-
a-iii) Other Seismic Hazards	LS	None required.	-
a-iv) Landslides	LS	None required.	-
b) Soil Erosion	PS	GEO-1. A grading, drainage, and erosion control plan shall be submitted to and approved by the County Planning Department prior to the start of construction activities. In the event that construction would involve more than an acre of disturbance, the project will require compliance with the State's General Construction Permit for storm water. The plan shall be prepared by a qualified Storm Water Pollution Prevention Plan Developer and shall incorporate standard erosion control practices and Best Management Practices. The project applicant shall file a	LS

TABLE 1-1
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Potential Impact	Significance Before Mitigation Measures	Mitigation Measures	Significance After Mitigation Measures
		Notice of Intent with the North Coast Regional Water Quality Control Board (RWQCB).	
c) Unstable Soils	NI	None required.	-
d) Expansive Soils	LS	None required.	-
e) Adequacy of Soils for Wastewater Disposal	LS	None required.	-
f) Paleontological Resources and Unique Geologic Features	PS	Mitigation Measure CULT-1.	LS
3.8 GREENHOUSE GAS EMISSIONS			
a) Project GHG Emissions	LS	None required.	-
b) Consistency with GHG Reduction Plans	LS	None required.	-
3.9 HAZARDS AND HAZARDOUS MATERIALS			
a) Hazardous Material Transport, Use and Storage	LS	None required.	-
b) Release of Hazardous Materials by Upset or Accident	LS	None required.	-
c) Hazardous Materials Releases near Schools	NI	None required.	-
d) Hazardous Materials Sites	LS	None required.	-
e) Emergency Response and Evacuation	NI	None required.	-
f) Wildland Fire Hazards	LS	None required.	-

TABLE 1-1
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Potential Impact	Significance Before Mitigation Measures	Mitigation Measures	Significance After Mitigation Measures
3.10 HYDROLOGY AND WATER QUALITY			
a) Violation of Water Quality Standards	PS	Mitigation Measure GEO-1.	LS
b) Groundwater Supplies and Recharge	LS	None required.	-
c-i, ii) Drainage Patterns	LS	None required.	-
c-iii) Runoff	LS	None required.	-
c-iv) Flood Flows	NI	None required.	-
d) Release of Pollutants in Flood Zone	LS	None required.	-
e) Conflict with Water Quality or Sustainable Groundwater Plans	LS	None required.	-
3.11 LAND USE AND PLANNING			
a) Division of Established Communities	NI	None required.	-
b) Conflict with Applicable Plans, Policies and Regulations Avoiding or Mitigating Environmental Effects	LS	None required.	-
3.12 MINERAL RESOURCES			
a, b) Loss of Mineral Resource Availability	NI	None required.	-
3.13 NOISE			
a) Exposure to Noise Exceeding Local Standards	LS	None required.	-
b) Groundborne Vibrations	LS	None required.	-

TABLE 1-1
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Potential Impact	Significance Before Mitigation Measures	Mitigation Measures	Significance After Mitigation Measures
c) Exposure to Airport/Airstrip Noise	NI	None required.	-
3.14 POPULATION AND HOUSING			
a) Population Growth Inducement	LS	None required.	-
b, c) Displacement of Housing and People	NI	None required.	-
3.15 PUBLIC SERVICES			
a-i) Fire Protection	LS	None required.	-
a-ii) Police Protection	LS	None required.	-
a-iii) Schools	NI	None required.	-
a-iv) Parks	NI	None required.	-
a-v) Other Public Facilities	NI	None required.	-
3.16 RECREATION			
a, b) Recreational Facilities	NI	None required.	-
3.17 TRANSPORTATION/TRAFFIC			
a) Conflict with Transportation Plans, Ordinances and Policies	LS	None required.	-
b) Conflict with CEQA Guidelines Section 15064.3(b)	LS	None required.	-
c) Traffic Hazards	LS	None required.	-
d) Emergency Access	NI	None required.	-

TABLE 1-1
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Potential Impact	Significance Before Mitigation Measures	Mitigation Measures	Significance After Mitigation Measures
3.18 TRIBAL CULTURAL RESOURCES			
a-i, ii) Tribal Cultural Resources	PS	Mitigation Measure CULT-1.	LS
3.19 UTILITIES AND SERVICE SYSTEMS			
a) Construction or Relocation of Infrastructure	LS	None required.	-
b) Water Supply	LS	None required.	-
c) Wastewater Systems	NI	None required.	-
d, e) Solid Waste Services	LS	None required.	-
3.20 WILDFIRE			
a) Emergency Response and Emergency Evacuation Plans	NI	None required.	-
b) Exposure of Project Occupants to Pollutants	LS	None required.	-
c) Installation and Maintenance of Infrastructure	LS	None required.	-
d) Risks from Runoff, Post-Fire Slope Instability, or Drainage Changes	LS	None required.	-
3.21 MANDATORY FINDINGS OF SIGNIFICANCE			
a) Findings on Biological and Cultural Resources	PS	Mitigation measures in Sections 3.4 and 3.5.	LS
b) Findings on Individually Limited but Cumulatively Considerable Impacts	LS	None required.	-

TABLE 1-1
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Potential Impact	Significance Before Mitigation Measures	Mitigation Measures	Significance After Mitigation Measures
c) Findings on Adverse Effects on Human Beings	NI	None required.	-

2.0 PROJECT DESCRIPTION

2.1 Project Location

The project site is on 3001 Morgan Hill Road east of the community of Hayfork, Trinity County, California (see Figures 1-1 through 1-5). It is on a 40-acre parcel described as Assessor's Parcel Number 017-430-49. The project site is shown on the U.S. Geological Survey's Hayfork, California, 7.5-minute quadrangle map within Section 8, Township 31 North, Range 11 West, Mt. Diablo Base and Meridian. The latitude of the project site is approximately 40° 33' 01" North, and the longitude is approximately 123° 08' 27" West.

2.2 Project Details

The proposed project has three main components – a cannabis manufacturing operation, expansion of existing cannabis cultivation, and a cannabis nursery that would be located on the project site (Figure 2-1). Purchase of materials from growers, sale of cannabinol to cannabis product manufacturers and delivery of any retail cannabis products produced onsite would involve cannabis distribution as defined in Ordinance No. 315-828. The project would require State licensing and County Conditional Use Permits for each of these activities. Chapter 1.0, Introduction, contains a summary of the proposed project and the required approvals, which are discussed in more detail below.

Cannabis Manufacturing Operation

The project proposes the establishment of a manufacturing operation for the extraction of cannabis oil. The operation would receive legally grown and harvested cannabis plants and trim the plants to obtain the leaves and flowers. "Legally grown and harvested" means cannabis that is harvested from State-licensed cultivation operations compliant with State regulations. It is anticipated that 1,000 to 2,000 pounds of mixed flowers and trim per week would be used. Some of the source plants would come from an existing cultivation facility on the project site, which is planned for expansion (see below). Other plants would be provided by sources in Trinity County, to be supplemented potentially by sources in Humboldt County and northern Mendocino County. Under County ordinance, manufacturing operations must purchase at least 75 percent of their plants from Trinity County sources.

This plant material would be subject to a hydrocarbon extraction process that generally involves processing the cannabis plant material with hydrocarbons, which for this project would primarily be butane, but also including ethanol; both of these volatile materials combine with the cannabis oils, which have high concentrations of the active cannabis ingredients. The combination is heated to evaporate the butane and ethanol, which are then recovered and recycled through the process.

The extract oil, which contains a high concentration of cannabinoids and terpenes, would be collected and sold to other licensed entities for production of cannabis-infused products. Another product would be “live resin,” an extract that is manufactured from fresh, flash-frozen cannabis flowers. The project applicant proposes to drive out to licensed farms contracting for services provided under the manufacturing license to flash-freeze the flowers, using proprietary equipment, then transporting the frozen flowers back to the manufacturing facility in a refrigerated transport truck that complies with all BCC guidelines for transport vehicles. For the extraction process, ethanol would be used.

The project applicant has indicated that the manufacturing operation would primarily sell the extract wholesale to other manufacturers who would make retail products, although it is possible that the Hayfork operation may also produce certain retail products such as vape pens.

The project proposes to conduct its manufacturing operation in a single new steel building to be constructed on the former location of the duplex greenhouse in the center of the project site (see Figure 2-1). The building, approximately 30 feet by 112 feet in floor area (3,360 square feet), would enclose the proposed manufacturing laboratory described in more detail below. The remainder of the building would be used for packaging and product storage. This building would include a walk-in freezer and a kitchen to prepare non-cannabis products for sale. It also would have a break room and restrooms for employees, along with lockers. It is anticipated that this building would be a steel-frame structure with an approximate ceiling height of 14 feet and a mezzanine.

The proposed manufacturing laboratory would consist of a converted steel shipping container, approximately 8 feet by 40 feet in size, that would be retrofitted as a Class 1 Division 1 extraction laboratory, in which workstations can be set up and a controlled environment established. This laboratory would have spark-proof exhaust fans and gas detection units for safety. Figure 2-2 shows an example of such a facility, which is similar to the facility proposed in the project.

The project proposes to install an odor control dispersion system to neutralize and disperse odors that may be generated by the greenhouses. The dispersion system is a high-pressure atomizing odor control system, which would take water provided by the site, blend the incoming water with biodegradable water-based neutralizer and disperse the resulting solution through a hydraulic hose that has high-pressure atomizing nozzles focused on the air flow that is being exhausted through the exhaust fans located on the greenhouse(s). The function of this system is to neutralize cannabis odors before they become fugitive. Components of this system, aside from the nozzles, include a 110/115-volt plug, a high-pressure water pump, an electric motor, a 50-micron bag filter, a pressure switch, a programmable timer, and a control box.

The manufacturing facility would have a designated loading area, set up in accordance with BCC regulations related to transport and distribution. Access to and from the various cannabis-related uses on the project site would be available via an existing gravel driveway off Morgan Hill Road. The driveway has a gate to control access. Existing on-site gravel roads would be used to access the proposed manufacturing building, which would have a

parking area to the northwest. Two existing trees would be removed to accommodate the new access road and parking area.

Proposed manufacturing facilities would have electricity and water service. Electrical service would be provided by Trinity Public Utilities District (PUD) through a three-phase system via existing overhead power lines located at Morgan Hill Road. A 2015 MQPower 45-kVa generator with Isuzu 4JJBT engine would be installed as a backup power generator for the entire facility in case of emergency power outages. Water would be provided by an existing on-site groundwater well.

A new septic system would collect wastewater generated from the manufacturing building and direct it to a septic tank/leach field system southeast of the manufacturing building. The septic tank capacity would be 1,200 gallons. The leach trench would be 300 feet long and 36 inches wide, and the minimum distance between leach lines would be 10 feet. An application for this system has been approved by the Trinity County Environmental Health Division. As permitted, the system would be constructed in accordance with the 2012 State Water Resources Control Board (SWRCB) Resolution No. 2012-0032 adopting the Water Quality Control Policy for Siting, Design, Operation, and Maintenance of Onsite Wastewater Treatment Systems. The County permit was approved on March 18, 2019; a copy is shown in Appendix B.

Butane would be delivered by Airgas on an as-needed basis. The butane and ethanol proposed for use would be stored in a locked control room that can be accessed only by personnel with authorized radio-frequency identification badges. Extra stock of these materials would be stored outside the building in a locked cage with bollards protecting the cage from accidental vehicle contact. Refrigerant for the freezer would be provided by the manufacturer in sealed containers.

Waste generated by cannabis manufacturing operations would consist of organic material that would be composted on site. The project would use a composting reactor that relies on worms to digest waste material and produce the compost. The unit is capable of consuming up to 150 pounds of waste per day and is modular and expandable to accommodate additional waste if necessary. The composting reactor would be located within the proposed warehouse, located next to the proposed cultivation greenhouse and described later in this chapter.

Warehouse

A warehouse, approximately 30 feet by 120 feet in floor dimension for a total floor area of 3,600 square feet, would be constructed adjacent to and southeast of the new greenhouse. The warehouse would be used for storage for equipment and materials related to greenhouse activities, as well as contain a drying room for cannabis. A 150-square foot area of the warehouse, approximately 10 feet by 15 feet in floor area, would be set aside for the composting area, as noted above.

Restrooms would be installed for cultivation employees. Wastewater from these restrooms and cultivation operations would be collected and processed by a second septic tank/leach field system, to be installed southwest of the warehouse and greenhouse. This septic system

would have the same features and capacities as the septic system adjacent to the manufacturing building. As with the other system, an application for this system was approved by the Trinity County Environmental Health Division on March 18, 2019; a copy is shown in Appendix B.

Hazardous Materials Use and Storage

Existing cannabis grow operations on the project site involve the use of diesel fuel for farm equipment and propane for heating greenhouses and accessory buildings. Up to 500 gallons of diesel fuel is stored in an existing twin-wall tank with a 110% containment baffle. Up to 1,000 gallons of propane is stored in an outdoor cylinder equipped with pressure relief valving, overfill protection valves, and secondary pressure relief. Propane used for heating greenhouses and accessory buildings.

The proposed project would use butane for the proposed cannabis manufacturing processes. Butane storage would occur in a controlled area inside the manufacturing building accessible only to authorized lab staff with RFID cards. Butane storage would include one 100-pound gas containment cylinder in the lab and up to five additional cylinders, each containing 100 pounds of butane stored outdoors within a secure fenced area. Cylinders would be equipped with pressure relief valves, an overflow protection device and secondary pressure relief valve.

Ethanol also would be used in the cannabis manufacturing process. Ethanol is shipped in intermediary bulk containers (totes) that hold approximately 275 gallons. Manufacturing operations would involve the use of one tote (275 gallons) in the lab. An additional 275-gallon totes would be stored in the secure fenced area outdoors. The outdoor storage area would be a concrete pad enclosed with cyclone fencing and RFID locks. This fenced area would be surrounded by bollards to prevent vehicle impact.

Both butane and ethanol containers would be stored on anti-static mats, and all employees would use anti-static mats prior to entering the lab work area. The storage area would be equipped with a volatile gas sensor wired to a general alarm area in case of storage tank failure.

Expanded Cannabis Cultivation

The project applicant also proposes future cannabis cultivation of up to one acre of canopy that will be developed on the project site as County and State regulations allow. The applicant is currently licensed as a "Small" cultivation site (allowing up to 10,000 square feet of canopy) and will continue to cultivate in compliance with a Small license type as allowed by the County Code. Site expansion in the future will include cultivating up to one acre of cultivation canopy using a combination of indoor and outdoor grow spaces as future Code allows. In the interest of full disclosure, the potential environmental effects of future cannabis cultivation as described are considered in this document.

Future outdoor cultivation would use prepared native soil as the growing medium. The cultivation area would have its soil ripped down to the hardpan. Soil amendments, based on soil testing, would be spread, then the field would be disked. A rototiller/bed shaper would form the cultivation beds. Weed control fabric and drip lines for irrigation would be

installed. The cultivation area would require the removal of five existing trees at its southern end.

A cable system would allow for tarps to be pulled over the beds in the evening hours and subsequently uncover them in daylight hours. Each bed would have a row of LED lights that would operate during the time the tarps cover the plants to extend the period the plants would be exposed to light. The goal is to be able to have plants flower twice in a season.

Pest control would occur through the release of beneficial insects and through rotational sprays of various essential oils and peroxyacetic acid. These activities do not require special licenses, nor would they be subject to any type of regulation. As with the proposed manufacturing operation, water would be provided by an existing on-site well. Soil moisture and water usage would be monitored by a third party.

In the future, the project applicant has indicated that this cultivation area will be converted to greenhouses as financing allows. Details on this conversion are not available at this time. If greenhouses are installed, then this installation may require additional CEQA review.

Cannabis Seed Nursery

The project applicant proposes to establish a cannabis seed nursery on the project site. The intent of the nursery is to maintain an existing cannabis seed business operated by the project applicant; no plants are intended to be grown for sale or delivery to individuals or to other licensed growers. Under State law, cannabis seed companies are required to have a nursery license.

The nursery operation would occur in four existing greenhouses on the project site, each 1,152 square feet in size, a total of 4,608 square feet. These greenhouses would be converted to nurseries as a part of the project; the nurseries would be devoted to the testing and production of seeds, as well as the preservation of the varieties needed to proceed with various breeding programs. As with the cultivation greenhouse, the nursery would have an odor control dispersion system to neutralize and dissipate odors. Water would be provided by four existing 300-gallon water tanks, one for each of the nursery structures.

Cannabis Distribution

The proposed manufacturing operation would involve purchase of cannabis materials from other farms as well as the transportation and storage of manufacturing raw material and manufacturing products. These activities are collectively known as “distribution” and require State licensing and a Conditional Use Permit from the County. For this project, “distribution” does not include direct retail sales to the public, nor does it include transportation of cannabis to the project site by other cultivators. Distribution does include delivery of manufactured cannabis products to licensed wholesale and retail cannabis businesses off-site as well as pickup of harvested cannabis from licensed growers.

Distributor licensees may store cannabis and cannabis products, subject to MAUCRSA and BCC regulations. Per these regulations, all storage facilities will be monitored via 24-hour video surveillance and will employ security measures congruent with BCC/CDFR specifications. Distributors are the only commercial cannabis license type that may

transport cannabis and cannabis products between licensees, except for testing samples, which will be transported by a testing laboratory employee. The project site will contain a secure and enclosed area, with 24-hour video surveillance, for the storage of transportation vehicles while awaiting transportation manifests as well as for overnight security for third-party transportation vehicles, in accordance with BCC and CDFA regulations.

Other Project Features

The project would include installation of additional security cameras equipped with motion sensors and proximity sensors for vehicles. Existing security equipment at the site includes a 30-camera surveillance system with 90-day backup and remote access enabled for BCC and CDFA access. Additional security systems and equipment will need to be added as operations expand. Additional overnight security would be provided by a staff watchman. Infrared LED cameras would be placed to monitor the cultivation area, along with motion sensor alarms. Existing fencing is in place around a portion of the project site; new fencing is not proposed.

Refuse would be stored on a concrete slab and under roof cover or in a portable/locked dumpster. Refuse shall be hauled weekly to an approved waste facility. As is done currently, compost would be stored on site.

It is expected that the project would employ a maximum of 22 regular workers. The manufacturing facility would employ four workers per shift for two daily overlapping shifts. Cultivation operations would employ six workers per shift for two daily overlapping shifts. Distribution activities would employ two workers per eight-hour day. Project activities may also require the hiring of up to 18 temporary workers from a licensed staffing agency during times of more intense work, such as harvest.

2.3 Permits and Approvals

The manufacturing facility would require a Conditional Use Permit from Trinity County. It is the intent of the project applicant to pursue a Type 7 license, which permits the use of volatile substances in manufacturing operations, from the CDPH. The Type 7 license is inclusive of activities permitted with a Type 6 license. An application to CDPH must demonstrate that the project has obtained County approval before the application is processed. The proposed manufacturing activities and safety provisions have been reviewed and approved by the County Fire Marshall.

Since Type 7 cannabis manufacturing facilities are not allowed under the existing zoning of the project site (A10, Agriculture), the project also would require a rezoning of the site. Cannabis manufacturing activities requiring a Type 6 license would be allowable under the existing zoning. According to the County cannabis manufacturing ordinance, manufacturing operations as proposed by the project are allowed only in the Heavy Commercial (C3), Industrial (I), and Specific Unit Development (SUD) zones. It is expected that a SUD zoning would be requested for the project. The SUD zone provides for developments that, because of a mixture of building types, land uses, or lot sizes, do not fit within the parameters of standard zoning regulations. Any use or combination of

uses which are arranged and designed in such a manner as to result in development which is internally compatible and compatible with surrounding uses is permitted, as long as a Use Permit from the County is obtained. The Trinity County zoning ordinance requires that new uses in SUD zones site obtain a separate Planning Commission Use Permit. As a result, new uses on the rezoned site would require these in addition to other approvals required from the County.

Section 24 of the Trinity County Zoning Ordinance outlines the requirements of the SUD zoning district, including conformance to a land use plan and development guidelines that are reviewed and approved by the County. The plan and guidelines are designed to accommodate the proposed use and avoid land use conflicts. The proposed project includes an application for the rezoning of the project site to SUD. The SUD application includes the proposed site plan shown in Figure 2-1, as well as specific guidelines for development of the site. The guidelines define allowable uses for the project site as those ordinarily permitted in the Agriculture zone, as well as cannabis manufacturing and nursery uses in accordance with the site plan and subject to the requirements of Trinity County Ordinances 315-327 and 315-838.

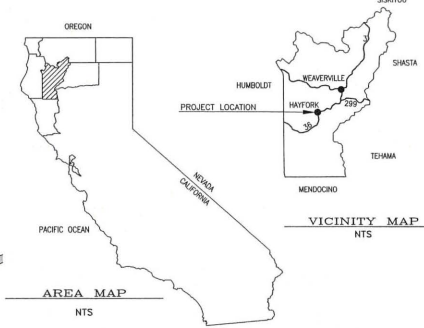
Any future site expansion allowed by changes in County Code would require cultivation licenses from the CDFA and a Conditional Use Permit from the County. It is anticipated that a request will be made for one Type 2b (Small Mixed-Light Tier 1 and Tier 2) license for the greenhouse, and a request for three additional Type 2b licenses will be submitted in the future should County regulations allow.

For the proposed nursery, a BCC Type 4 State license would be required, along with a Conditional Use Permit from the County. For State licenses, these project features must show that they have obtained County approvals. A BCC Type 11 license is required for distribution of the manufacturing and nursery products, along with a Conditional Use Permit from the County.

Septic systems have obtained approval from the County Environmental Health Division, as well as a well permit if the existing on-site well cannot adequately provide the necessary water for project operations. Approval from the California Department of Toxic Substances Control (DTSC), in its role as the Certified Unified Program Agency (CUPA) for Trinity County, is required for the use and storage of hazardous materials. A Hazardous Material Business Plan also must be submitted to DTSC as the County CUPA.

PROPERTY & PREMISE DIAGRAM

APN: 017-430-49
DAN DAVOUDIAN
3001 MORGAN HILL ROAD
HAYFORK, CA 96041



WATER TOTALS	
(E) 2,500 GAL WATER TANK - 1	2,500 GAL
(E) 1,100 GAL WATER TANK - 2	2,200 GAL
(E) 300 GAL WATER TANK - 5	1,500 GAL
TOTAL WATER STORAGE	6,200 GAL

CULTIVATION TOTALS	
(P) CULTIVATION AREA (TYPE 2b)	30,000 SF
(E) GREENHOUSE 1 (TAL18-0004941)	1,152 SF
(E) GREENHOUSE 2 (TAL18-0004941)	12,600 SF
SUBTOTAL AREA	43,752 SF
(P) NURSERY	4,608 SF
SUBTOTAL NURSERY AREA	4,608 SF
TOTAL AREA	48,360 SF

SECURITY NOTES
SECURITY CAMERAS WILL BE EQUIP WITH MOTION SENSORS AND PROXIMITY SENSORS FOR VEHICLES. OVER NIGHT SECURITY WILL BE PROVIDED BY A STAFFED WATCHMAN.

IMPROVEMENT NOTES
REFUSE SHALL BE STORED ON A CONCRETE SLAB AND UNDER ROOF COVER OR IN A PORTABLE/LOCKABLE DUMPSTER. REFUSE MUST BE HAULLED TO AN APPROVED WASTE FACILITY WEEKLY.
COMPOST SHALL BE STORED AND COMPOSTED ONSITE. CANNABIS WASTE CANNOT EXCEED 50% OF THE GENERATED ORGANIC MATERIAL.

SRA REQUIREMENTS
PROVIDE ADEQUATE WATER STORAGE AND DELIVERY AS OUTLINED BY SRA ORDINANCE AND CALFIRE REQUIREMENTS
PROVIDE ADEQUATE TURN AROUND AND PULLOUTS AS OUTLINED BY SRA ORDINANCE REQUIREMENTS AND CALFIRE REQUIREMENTS

GENERAL NOTES
WATER: SPRING/ WELL
WASTEWATER: ONSITE
POWER: TRINITY PUD
PHONE: TRINITY
CREEKS/STREAMS: HAYFORK CREEK
GRADING: PREVIOUSLY COMPLETED FOR BUILDING PADS AND ACCESS ROADWAYS
SURVEY: TVCE DID NOT CONDUCT A PROPERTY SURVEY. DIMENSIONS ARE FROM TRINITY CO. GIS

CONTRACTOR ALERT!
CONTRACTOR MUST CONTACT USA DIG AT 800-227-2600 AT LEAST 72 HOURS BEFORE ANY EARTHWORK OR ACTIVITIES THAT MAY IMPACT EXISTING UNDERGROUND UTILITIES.
EXISTING UTILITY ALIGNMENTS BOTH HORIZONTALLY AND VERTICALLY MUST BE VERIFIED BY THE CONTRACTOR PRIOR TO ANY CONSTRUCTION ACTIVITIES.

TVCE
10000 N. MAIN ST. SUITE 100
HAYFORK, CA 96041
TEL: (530) 625-3011
FAX: (530) 625-3011

DATE: 10/27/21
DRAWN BY: J. MCKNIGHT
CHECKED BY: J. MCKNIGHT
APPROVED BY: J. MCKNIGHT

SCALE: AS SHOWN
PROJECT NO: 858
DRAWING NO: 1 OF 1

TRINITY VALLEY CONSULTING ENGINEERS, INC.

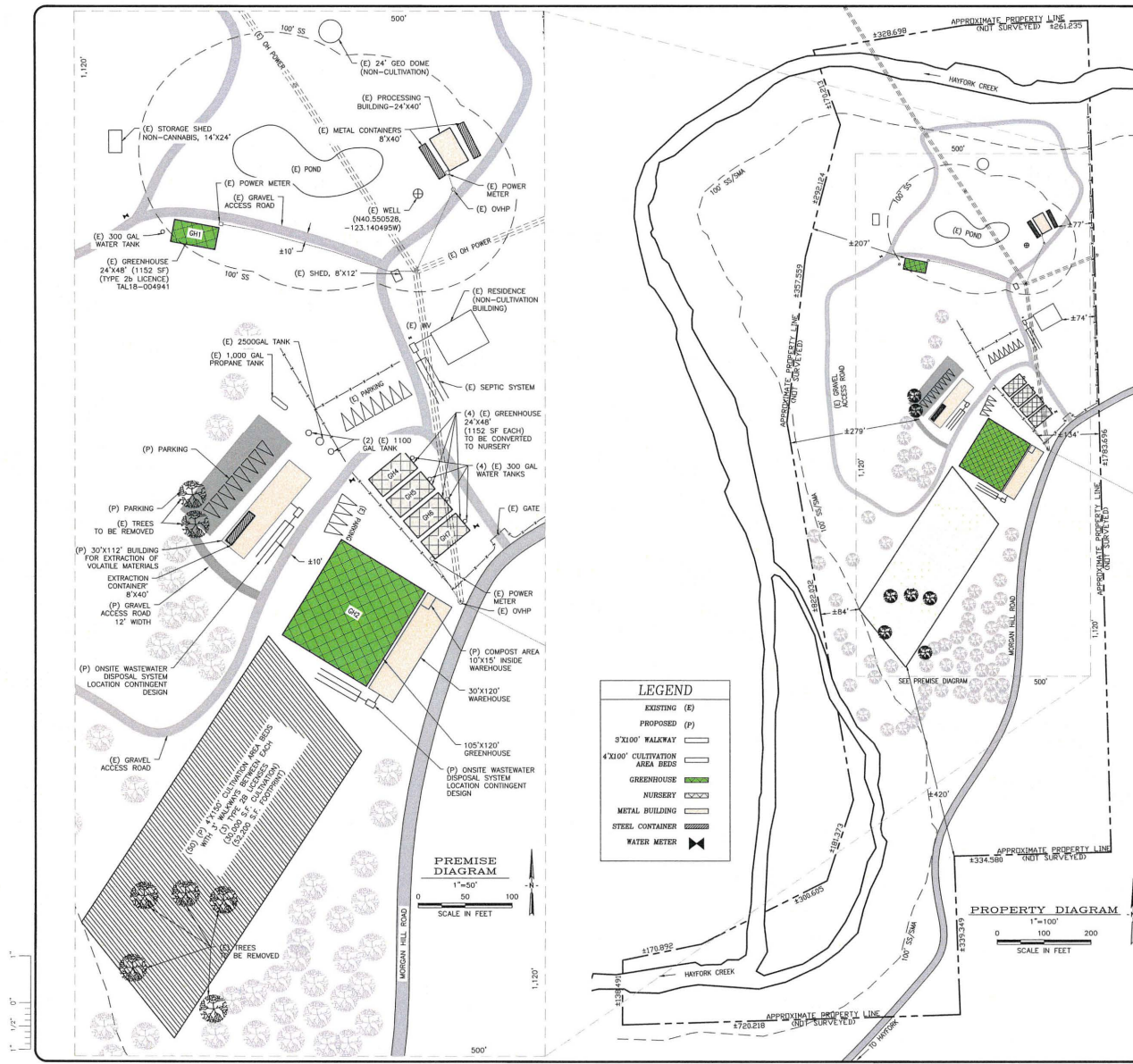
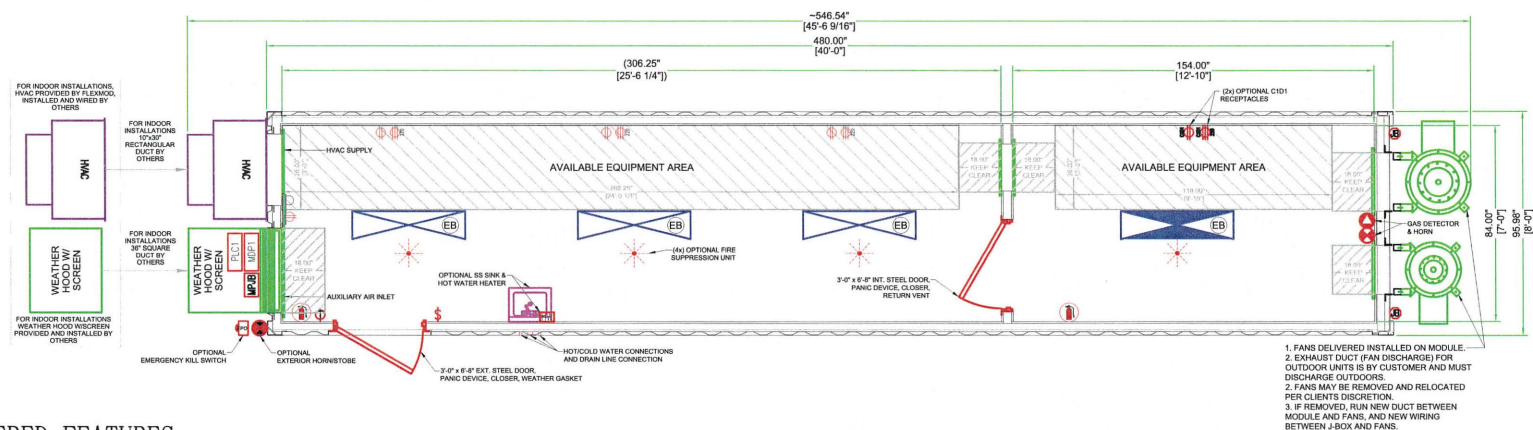


Figure 2-1
SITE PLAN



Product Line: FLEXLAB Type: COMBO Description: Volatile Gas Extraction Laboratory Model Number: FL840CB



ENGINEERED FEATURES

STANDARD EQUIPMENT

DESCRIPTION	QUANTITY
PRIMARY EXHAUST FAN	1
AUXILIARY EXHAUST FAN	1
HVAC UNIT	1
AUXILIARY AIR INLET w/ WEATHER HOOD*	1
MULTI CABLE TRANSIT (MCT)**	1
110v 30A DUPLEX RECEPTACLE	4
208/220v 30A DUPLEX RECEPTACLE	3
3-0x6-8 EXT. STEEL DOOR, PANIC DEVICE, CLOSER, WEATHER SEAL	1
3-0x6-8 INT. STEEL DOOR, PANIC DEVICE, CLOSER, RETURN VENT	1
WALL MOUNTED THERMOSTAT	1
48\" C1D1 PENDANT LED LIGHT WITH EMERGENCY BALLAST	3
48\" C1D1 PENDANT LED LIGHT WITH EMERGENCY BALLAST	1
C1D1 FLAMMABLE GAS DETECTOR	1
C1D1 ALARM HORN	1
MAIN DISTRIBUTION PANEL WITH DISCONNECT	1
PLC - SYSTEM CONTROLLER	1
EXTERIOR ELECTRICAL SERVICE CONNECTION	1
ABC DRY CHEMICAL FIRE EXTINGUISHER	2
WALL MOUNTED EYEWASH STATION	1

*If your unit will be located indoors and ducted to the exterior, the weather hood must be supplied by your ducting installer.

**Space has been left open in the MCT above the electrical panel for site wiring of fire or security systems and/or sprinkler piping.

OPTIONAL EQUIPMENT

DESCRIPTION	QUANTITY
C1D1 110v 30A RECEPTACLE*	1
C1D1 208/220v 30A RECEPTACLE*	1
CEILING MOUNTED DRY CHEMICAL FIRE SUPPRESSION CANISTER	4
SS HAND SINK & ASSOCIATED PLUMBING CONNECTIONS	1
POINT-OF-USE HOT WATER HEATER	1
EXTERIOR ALARM/STROBE	1
EXTERIOR EMERGENCY KILL SWITCH (MUSHROOM, PUSH)	1
MULTI CABLE TRANSIT (MCT)**	∞

*The sum of 110v + 208/220v receptacle drops will equal the given quantity, but additional receptacles may be added in a \"pass thru\" configuration.

**Space has been left open in the MCT above the electrical panel for site wiring of fire or security systems and/or sprinkler piping.

ELECTRICAL REQUIREMENTS

MINIMUM SERVICE REQUIREMENT	200 AMPS @ 208/120V 60Hz 3 ϕ
ESTIMATED FULL LOAD SERVICE DRAW*	157 AMPS @ 208/120V 60Hz 3 ϕ

*This number is an estimate based on the highest consumption equipment typically used inside the unit.

PHYSICAL SPECIFICATIONS

OVERALL WIDTH	8'
OVERALL LENGTH	~45'-6.5"
FOOTPRINT WIDTH	8'
FOOTPRINT LENGTH	40'
WEIGHT	16,518 lbs.

GENERAL NOTES:

1. EXTERIOR TO BE FULLY PAINTED, WHITE.
2. INTERIOR WALL SURFACES TO BE FRP, WHITE.
3. INTERIOR FLOOR TO BE SHEET VINYL, BLACK.



100 FILMORE ST.,
5th FLOOR
DENVER, CO 80206
TEL# (720) 356-0115
(800) 869-9798
FAX# (866) 205-2808
info@flexmod.com

PAGE: 1 OF 1

REVISION: Δ

FL840CB



Figure 2-2
MANUFACTURING CONTAINER

3.0 ENVIRONMENTAL EVALUATION CHECKLIST

The following environmental evaluation considers the potential environmental effects of County approval of the proposed the proposed Conditional Use Permits for cannabis manufacturing, distribution, nursery and cultivation activities on the project site. Because manufacturing uses are not allowed under the existing zoning, the project includes proposed rezoning of the site to allow the County to consider approval of the proposed cannabis-related uses. The project as a whole is described in Chapter 2.0, Project Description.

A rezoning action ordinarily would involve a change the range of allowable land uses on a project site, including land uses that are allowed “by right” and that may not require additional CEQA review. The environmental effects of potential future land uses would ordinarily need to be addressed under CEQA before the rezoning could be approved. However, with the proposed project; the proposed SUD zoning would limit potential development of the project site to only those uses shown on the site plan and discussed in the SUD guidelines. Therefore, the following environmental evaluation of the project focuses on the specific elements of the project described in Chapter 2.0.

3.1 AESTHETICS

Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?				√
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				√
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			√	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			√	

NARRATIVE DISCUSSION

Environmental Setting

The existing features of the project site consist of a single-family residence near the center of the parcel, a garage and two Conex containers north of the residence, a geodesic dome and shed on the northern portion of the parcel, and five greenhouses. The southern portion of the project site predominantly contains woodland. Hayfork Creek, the most prominent visual feature in the area, forms the approximate north and west boundaries of the project site.

The project site is within a predominantly rural residential area east of the town of Hayfork. It is surrounded by rural residences on large parcels and U.S. Forest Service land. Properties to the north and west of Hayfork Creek include a former lumber mill and a gravel mine. Where views are unobstructed by steep terrain or vegetation, views of canyons and mountain tops may be seen.

The project site and most of the existing improvements are visible from Morgan Hill Road, but only from the lightly-traveled segment that adjoins the proposed cultivation area. The project site is located south of Hayfork Creek and is separated from SR 3 by aging industrial buildings and site improvements. The existing industrial buildings and vegetation between the project site and the highway prevent any substantial view of existing improvements on the site from the highway.

Environmental Impacts and Mitigation Measures

a) Scenic Vistas.

Scenic vistas are defined as expansive views of highly-valued landscapes from publicly accessible viewpoints. Expansive views of the Hayfork Valley are available from SR 3, but project site is generally not visible from the highway, which is the main public roadway in Hayfork. Portions of the existing greenhouses can be discerned, but they are mostly screened by intervening trees and the former mill landscape in the foreground. The proposed project does not involve the construction of buildings that would obscure views, and there are no specific scenic vistas identified in the vicinity. The project would have no impact on scenic vistas.

b) Scenic Routes and Resources.

There are no officially-designated State Scenic Highways in Trinity County. The nearest Wild and Scenic River is the Trinity River, 10 miles to the northeast. The project site contains a forested area in its southern portion; however, the project would not affect that portion of the parcel. The project would have no impact on scenic routes or resources.

c) Visual Character and Quality.

The project site is in an area that is a mix of rural residences and U.S. Forest Service land. Properties to the north and west of the project site include a former lumber mill and a gravel mine. The site itself contains greenhouses and other structures, along with

forested land in the southern portion. The project proposes the installation of additional structures and an outdoor cultivation area. The cultivation area and new access road and parking area would require the removal of seven trees. However, the proposed new manufacturing facilities would be hidden from local view by the existing greenhouses. Other proposed improvements, including expanded cultivation area, would be consistent with the existing visual character of the project site and vicinity. The number of trees removed would be minimal compared with the canopy on the project site. Overall, the on-site visual character would not substantially change.

Under the conditions of a cultivation license, a project applicant may be required to erect a security and concealment fence, 6 to 8 feet tall, that will obscure the view of the cultivation area. This would screen views of proposed cultivation operations from other properties. However, the County no longer requires fencing for cultivation areas; determinations on fencing will be made on a case-by-case basis. It is expected that the proposed security measures for the cultivation area will be deemed adequate, and no additional fencing would be required. As noted above, the project site is not readily visible from State Route 3 and contains no distinctive scenic resources. Project impacts related to visual character and quality would be less than significant.

d) Light and Glare.

Artificial lighting would be used as part of the expanded cultivation. Without screening, the lighting could be visible from nearby properties. However, the LED lights in the cultivation area will be used only when tarps cover the plant beds. This would be consistent with the County cultivation ordinance, which requires all lighting associated with a cultivation operation to be downcast, shielded, and/or screened to keep light emanating off-site or into the sky. In addition, CDFA regulations and the County cultivation ordinance require mixed-light license types of all tiers and sizes to ensure that lights used for cultivation are shielded from sunset to sunrise to avoid nighttime glare and visibility from neighboring properties.

Lighting for the manufacturing buildings would be interior only, so this lighting would not be visible. For the nursery, the County nursery ordinance requires that glare from nursery facilities and resale locations shall not emanate onto neighboring properties. Compliance with the applicable ordinances would ensure that project impacts related to light and glare would be less than significant.

3.2 AGRICULTURE AND FORESTRY RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-				√

agricultural use?

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

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

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

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

		√	
			√
			√
			√

NARRATIVE DISCUSSION

Environmental Setting

Agriculture has had a significant role historically in the Hayfork Valley. Ranching, mostly cattle, has been the main agricultural activity. Produce farming has been limited primarily to small-scale operations and vegetable gardening associated with residences (Trinity County 1996). Timber also has had a significant role in the Hayfork economy, but that role has decreased in recent years (see Section 3.5, Cultural Resources).

Cannabis cultivation occurs on the project site and on many properties in the Hayfork area, including the two properties to the east (Natural Investigations Company 2018). Cannabis is defined as an agricultural product by the State of California. The Hayfork Community Plan has designated the project site Agriculture, and the zoning for the project site is A10 – Agriculture, 10-acre minimum.

Environmental Impacts and Mitigation Measures

a) Agricultural Land Conversion.

The Important Farmland Maps, prepared by the California Department of Conservation as part of the Farmland Mapping and Monitoring Program, designate the viability of lands for farmland use, based on the physical and chemical properties of the soils. Classifications include Prime Farmland, Unique Farmland, and Farmland of Statewide Importance, along with other agricultural and non-agricultural classifications. No Important Farmland Maps of Trinity County have been prepared by the State. The project proposes expansion of activities defined as agricultural. The project would have no impact related to Farmland conversion.

b) Agricultural Zoning and Williamson Act.

As noted, the project site is zoned for agricultural use. However, agricultural activities other than cannabis cultivation do not occur on the project site. The project proposes to expand cannabis cultivation, but it would not preclude agricultural use of the remainder of the project site. Agriculture should be defined as a permitted use in the SUD permit. As noted, cannabis is defined as an agricultural product by the State of California.

The project proposes to change the zoning on the project site to SUD. The SUD zone provides for developments that, because of a mixture of building types, land uses, or lot sizes, do not fit within the parameters of standard zoning regulations. Any use or combination of uses which are arranged and designed in such a manner as to result in development which is internally compatible and compatible with surrounding uses is permitted as long as a Planning Commission Use Permit is obtained. The proposed project uses would be consistent with existing on-site activities recognized as agricultural by the State, as they would process cannabis. It should be noted that under the existing A10 zone, agricultural processing plants are allowed with a use permit.

The project site is not enrolled in a Williamson Act contract. Project impacts related to agricultural zoning and the Williamson Act would be less than significant.

c) Forest Land Zoning.

The County designates land for forestry use with the Timberland Production zone. The project site is not zoned Timberland Production and therefore is not designated for forestry uses. The project would have no impact on forest land zoning.

d) Forest Land Conversion.

The project site has a forested area in its southern portion that could potentially support timber production. However, no project facilities are proposed in this portion, and no land would be converted from forestry uses. As noted in c) above, the project site is not zoned for forestry uses. The project would have no impact on forest land conversion.

e) Indirect Conversion of Farmland and Forest Land.

It is not expected that the project would indirectly encourage the conversion of Farmland to non-agricultural uses. As noted above, cannabis cultivation occurs on and near the project site, and cannabis is recognized as an agricultural product by the State. Also, no Farmland has been designated in the area by the California Department of Conservation. The project is not expected to indirectly convert nearby forest land to non-timber uses, as it would not install infrastructure that may indirectly encourage such conversion. The project would have no impact related to indirect conversion of Farmland or forest land.

3.3 AIR QUALITY

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

- a) Conflict with or obstruct implementation of the applicable Air Quality Attainment Plan?
- b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?
- c) Expose sensitive receptors to substantial pollutant concentrations?
- d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Potentially Significant Impact Less Than Significant with Mitigation Incorporated Less Than Significant Impact No Impact

			√
			√
		√	
		√	

NARRATIVE DISCUSSION

Environmental Setting

Air Quality Background

The project site is within the North Coast Air Basin, which encompasses four counties (Del Norte, Humboldt, Mendocino, and Trinity) and part of a fifth (Sonoma). Under their respective Clean Air Acts, both the State of California and the federal government have established ambient air quality standards for six criteria air pollutants: ozone, particulate matter, carbon monoxide, nitrogen dioxide, sulfur dioxide, and lead. Under its Clean Air Act, California has established standards for four additional pollutants. Table 3-1 shows the current attainment status of the North Coast Air Basin relative to the federal and State ambient air quality standards for criteria pollutants. Except for State particulate matter, the Air Basin is in attainment of, or unclassified for, all federal and State ambient air quality standards. The nonattainment status for State PM₁₀ standards applies only to Humboldt County.

In addition to the criteria pollutants, the California Air Resources Board has also identified other air pollutants as toxic air contaminants - pollutants that are carcinogenic (i.e., cause cancer) or that may cause other adverse short-term or long-term health effects. Diesel particulate matter, considered a carcinogen, is the most common toxic air contaminant, as it is a product of combustion in diesel engines. Others are typically associated with industrial activities and therefore are less common.

TABLE 3-1
NORTH COAST AIR BASIN ATTAINMENT STATUS

Criteria Pollutant	Designation/Classification	
	Federal Primary Standards	State Standards
Ozone - One hour	No federal standards	Attainment
Ozone - Eight hour	Unclassified/Attainment	No state standards
PM ₁₀	Unclassified	Nonattainment*/Attainment
PM _{2.5}	Unclassified	Attainment
Carbon Monoxide (CO)	Unclassified	Unclassified
Nitrogen Dioxide (NO _x)	Unclassified/Attainment	Attainment
Sulfur Dioxide (SO _x)	Unclassified	Attainment
Lead	Unclassified/Attainment	Attainment
Hydrogen Sulfide	No federal standards	Unclassified
Sulfates	No federal standards	Unclassified
Visibility Reducing Particles	No federal standards	Unclassified
Vinyl Chloride	No federal standards	Unclassified

* Humboldt County only.

Source: California Air Resources Board, <https://www.arb.ca.gov/design/adm/adm.htm>.

The North Coast Unified Air Quality Management District (NCUAQMD) has jurisdiction over most air quality matters in Del Norte, Humboldt, and Trinity Counties. The NCUAQMD is tasked with implementing programs required by both the federal and California Clean Air Acts, as well as attainment and maintenance plans, through adopted rules and regulations. A PM₁₀ attainment plan has been drafted, but this plan has not yet been formally adopted.

The NCUAQMD has not established significance thresholds explicitly for CEQA impacts. For new stationary sources of pollutants, the NCUAQMD applies Rule 110 – New Source Review and Prevention of Significant Deterioration. Rule 110 establishes significance thresholds for air pollutant beyond which Best Available Control Technology needs to be applied. Table 3-2 shows the Rule 110 significance thresholds.

TABLE 3-2
NCUAQMD RULE 110 SIGNIFICANCE THRESHOLDS

Pollutant	Significance Thresholds	
	Daily (pounds per day)	Annual (tons per year)
Carbon monoxide	500.0	100.0
Fluorides	15.0	3.0
Hydrogen sulfide	50.0	10.0
Lead	3.2	0.6
Nitrogen oxides	50.0	40.0
Particulate matter (PM10)	80.0	15.0
Particulate matter (PM2.5)	50.0	10.0
Reactive organic compounds	50.0	40.0
Reduces sulfur compounds	50.0	10.0
Sulfur oxides	80.0	40.0
Sulfuric acid mist	35.0	7.0
Total reduced sulfur compounds	50.0	10.0

Source: NCUAQMD

Environmental Impacts and Mitigation Measures

a) Air Quality Plan Consistency.

Project construction activities such as the construction of greenhouses and the installation of the manufacturing structures may generate dust. These activities are considered minor and would not create dust emissions that would require specialized abatement practices, particularly since there are no nearby sensitive receptors (see d) below). Vehicle use during project operations would be limited to light duty vehicles and delivery truck traffic. Dust emissions would be generated on the gravel driveway to the project site, but such emissions would be minor. Vehicle traffic associated with the project is not expected to generate dust emissions that would cause a substantial increase in PM₁₀ within Trinity County or the North Coast Air Basin.

As noted, the NCUAQMD has not established significance thresholds explicitly for CEQA impacts. For this analysis, the Rule 110 thresholds will provide a basis for evaluating the significance of air quality impacts. Project emissions are estimated using the California Emissions Estimator Model (CalEEMod), a computer modeling program accepted for use by most California air districts, including the NCUAQMD. CalEEMod does not have factors that explicitly define potential emissions from a cannabis manufacturing activity, so emissions factors for general light industrial uses were used. CalEEMod also does not estimate emissions from primarily agricultural activities, as they generally do not generate substantial amount of air pollutants. Table 3-3 shows a summary of the results. Full results are available in Appendix C of this IS/MND.

TABLE 3-3
PROJECT AIR POLLUTANT EMISSIONS

	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Construction Emissions (total tons)	0.04	0.03	0.03	<0.01	<0.01	<0.01
<i>Above Rule 110 Threshold?</i>	No	No	No	No	No	No
Operational Emissions (tons/year)	0.03	0.10	0.21	<0.01	0.02	<0.01
<i>Above Rule 110 Threshold?</i>	No	No	No	No	No	No

Source: CalEEMod Version 2016.3.1.

The results of the CalEEMod run indicate that the project emissions would clearly not exceed any of the Rule 110 annual thresholds and would in fact be incidental.

A potential source of air pollutant emissions is the backup generator. The generator would be operated only during times of power interruption, which are expected to be infrequent, and possibly once per month to ensure it remains in working condition. The generator complies with California Air Resources Board emission standards, which strictly limit the amount of NO_x and particulate matter emissions from stationary diesel engines. Generator emissions are not expected to exceed Rule 110 annual thresholds.

The NCUAQMD has not adopted any air quality attainment plans. Trinity County is in attainment of, or unclassified for, all State and federal ambient air quality standards, so no attainment plans apply to the County. The project would have no impact related to air quality plans. Project impacts related to air quality standards would be less than significant.

b) Cumulative Emissions.

As described above, Trinity County is in attainment of, or unclassified for, all State and federal ambient air quality standards. As noted in b) above, the project would not generate emissions that would contribute to an existing nonattainment status in the County or lead to a projected nonattainment status. The project would have no cumulative impact on air quality.

c) Exposure of Sensitive Receptors.

The nearest sensitive receptors to the project site are a day care center, a residential subdivision, and a high school approximately one mile to the west (Natural Investigations Company 2018). Given the distance of these sensitive receptors, they would not be exposed to any pollutant emissions generated by project construction or operations, which are considered minor. There are residences closer than one mile, but these are scattered and small in number. As described in Section 3.8, Hazards and Hazardous Materials, the County cannabis manufacturing ordinance states that extractions must be in a “closed loop” system, in which the solvent used in the extraction process is not exposed to the outside atmosphere. Thus, solvent is not expected to be released in the atmosphere. Project impacts related to sensitive receptors would be less than significant.

d) Odors.

Cannabis cultivation can potentially generate objectionable odors, primarily with indoor cultivation and nursery operations. County Ordinance No. 315-823, Section 1, subsection(s) 13 and 14 note potential concerns regarding odors.

In greenhouse and nursery operations, odors may be contained and filtered. As described in Chapter 2.0, Project Description, the project proposes to install odor control dispersion systems for the greenhouses and nursery. These systems are expected to reduce odors substantially. No significant odor impacts that would affect a substantial number of people are anticipated from the project because of the limited population in the area, setback from public roads, and the use of odor control equipment. CDPH regulations on cannabis manufacturing require waste disposal in a manner that minimizes odor development. Also, as noted in c) above, land uses that may be especially sensitive to odors are scattered and unlikely to be exposed to substantial odors. Project impacts related to odors would be less than significant.

3.4 BIOLOGICAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Adversely impact, either directly or through habitat modifications, any endangered, rare, or threatened species, as listed in Title 14 of the California Code of Regulations (Sections 670.2 or 670.5) or in Title 50, Code of Federal Regulations (Sections 17.11 or 17.12)?				√
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?				√
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				√
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?		√		
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			√	

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

			✓
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NARRATIVE DISCUSSION

Environmental Setting

The project site lies at the toe of a mountain slope on a river terrace, with topography ranging from moderately steep north-facing slopes to flat floodplains. Hayfork Creek flows along the north and west edges of the project site. Five distinct vegetation communities have been identified on and in the vicinity of the project site (Natural Investigations Company 2018):

- The southern portion of the project site contains mixed conifer forest. This area is mostly undisturbed, other than by Morgan Hill Road and a gravel driveway, and has substantial tree canopy.
- Riparian vegetation is found along Hayfork Creek. The creek has relatively sparse riparian vegetation, as the banks are subject to flooding and erosion. Nevertheless, native alder, blackberry, and introduced flowering plants of the *Scandix* genus have been found along the creek (Trinity County 1983).
- Pine woodland is in some of the northern portion of the project site.
- Grassland is found along the boundary of the pine woodland and the mixed conifer forest near the center of the parcel.
- The area where most of the existing cannabis activity is located is designated ruderal/developed. “Ruderal” denotes plant species that are first to colonize lands disturbed by human activity.

The project site itself includes river terraces and intervening slopes. Vegetation density on the site ranges from relatively dense mixed conifer and understory shrub vegetation on the slopes and relatively open stands of pine trees, shrubs and sparse ground cover on the relatively-level terrace surfaces. Most of the proposed development areas do not have tree cover; however, as shown on Figure 2-1, a total of seven relatively small pine trees are located within the project footprint. These trees range in size from 7.6 to 14.6 inches in diameter.

Environmental Impacts and Mitigation Measures

a) Special-Status Species.

The project site is not within any designated critical habitat for listed species. A site survey conducted by Natural Investigations Company did not observe any special-status animal or plant species (Natural Investigations Company 2018). The California

Department of Fish and Wildlife's rare species database, the California Natural Diversity Database, was queried on December 12, 2017. No special status habitats were mapped on the project site or contiguous parcels. Because the project operational areas would be in places that were previously disturbed or lack sensitive habitats, no impacts to special-status plant species would likely occur from project implementation.

Two special-status wildlife species were mapped in the vicinity – Pacific fisher and foothill yellow-legged frog. The Pacific fisher, a member of the weasel family listed as threatened under the California Endangered Species Act, prefers large areas of dense mature coniferous or mixed forest and are solitary animals. The foothill yellow-legged frog, a candidate threatened species under the California Endangered Species Act, occurs in streams flowing through a variety of vegetation types, favoring channels with at least some shading cast by riparian vegetation. However, no natural habitat was disturbed in establishment of the cultivation operation, and the project does not propose to disturb areas where these species could be found. No impacts to special-status species were identified from project implementation.

b) Riparian and Other Sensitive Habitats.

The proposed project would involve the removal of a total of seven pine trees ranging in size from seven to 14 inches in diameter. These trees are not part of a special-status or otherwise sensitive habitat type and represent a small fraction of the existing tree cover in the immediate project vicinity. Removal of these trees would not involve a significant biological impact.

As noted, riparian vegetation is found along Hayfork Creek. The project would not encroach upon this riparian area. The cultivation operation has established a minimum buffer distance of at least 300 feet to the nearest waterbodies. The proposed project would not encroach upon this buffer, thereby preserving the riparian area from disturbance. No other sensitive habitats were identified. The project would have no impact on riparian and other sensitive habitats.

c) Wetlands and Waters of the U.S.

Waters of the U.S., including wetlands, are broadly defined under 33 Code of Federal Regulations 328 to include navigable waterways, their tributaries, and adjacent wetlands. Jurisdictional wetlands and Waters of the U.S. include, but are not limited to, perennial and intermittent creeks and drainages, lakes, seeps, and springs; emergent marshes; riparian wetlands; and seasonal wetlands.

Natural Investigations Company queried the U.S. Fish and Wildlife Service's wetland database, the National Wetland Inventory, on January 3, 2018. The nearest potential Waters of the U.S. are Hayfork Creek and its riverine wetlands. The CDFW reviewed a notification by the project applicant about the project. In a response letter, CDFW stated that the project would not substantially affect a fish or wildlife resource, and therefore would not require a Lake and Streambed Alteration Agreement (CDFW 2018). As noted in b) above, the cultivation operation has established a minimum buffer distance of at least 300 feet to the nearest waterbodies. The proposed project would not encroach upon

this buffer; therefore, the project would have no impact on wetlands and Waters of the U.S.

d) Fish and Wildlife Movement.

According to a map by the California Department of Fish and Wildlife, the project site is within the winter range of mule deer. The project would be concentrated on the already-developed northern portion of the 40-acre parcel, while the southern portion would remain mostly undeveloped and available to wildlife. As such, the project would not substantially interfere with movement of wildlife, including deer.

Steelhead trout and Chinook salmon occur in Hayfork Creek. The project would not alter Hayfork Creek; moreover, fish habitat within the creek would be protected by the no-disturbance buffer (see b) above).

Proposed tree removal could potentially disturb birds nesting in these trees. Several federal and State laws have been established to protect birds (e.g., the Migratory Bird Treaty Act; California Fish and Game Code Sections 3503, 3503.5, and 3513), with which licensees would be required to comply. Compliance with these regulatory requirements would reduce the potential for impacts on nesting birds (Natural Investigations Company 2018). Mitigation described below would implement these requirements, reducing impacts on migratory birds.

With implementation of the mitigation measure, the project would not interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, nor would it impede the use of native wildlife nursery sites. Project impacts would be less than significant with mitigation.

Level of Significance: Potentially significant

Mitigation Measures:

BIO-1: If tree removal is proposed during the general avian nesting season (February 1 through August 31), then a pre-construction survey for nesting birds shall be conducted by a qualified biologist within 14 days of proposed construction. If active nests are found, then removal of the tree with the nest shall be delayed until the young have fledged. No further mitigation shall be implemented if no active bird nests are found, and no mitigation need be implemented if tree removal occurs outside the nesting season.

Significance After Mitigation: Less than significant

e) Local Biological Requirements.

Trinity County has provisions in its County Code applicable to the protection of biological resources. For example, Chapter 8.24 regulates the application of herbicides in part to protect game animals. Chapter 8.28 prohibits the muddying of streams to protect water resources. The enactment of the County cannabis ordinances was done, in part, to

encourage legal cultivation and manufacturing that has less of an adverse environmental impact than illegal cultivations. An applicant for a license must comply with all local ordinances and regulations, including those intended to protect biological resources. With compliance, the project would not conflict with local policies or ordinances protecting biological resources. Project impacts would be less than significant.

f) Conflict with Habitat Conservation Plans.

The project site is not in the coverage area of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other conservation plan. Because of this, the project would have no conflicts with applicable habitat conservation plans; therefore, it would have no impact.

3.5 CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?				√
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?		√		
c) Disturb any human remains, including those interred outside of formal cemeteries?			√	

NARRATIVE DISCUSSION

Environmental Setting

At the time of first Euro-American contact, the Hayfork Valley was occupied by the Wintu tribe. The Wintu lived in bark houses in villages of up to 150 people. The people depended heavily upon the salmon and steelhead resources for subsistence, with deer, elk, and antelope also having an important role in their diet. Acorns were a major staple, supplemented by hazelnuts, berries, manzanita, and a variety of bulbs, seeds, and greens. Trade occurred among Wintu villages, with clamshell disk beads being the main item of exchange. Salt and obsidian were the major exports of the Wintu to the tribes in the mountains to the west (Trinity County 1984).

Jedediah Smith is considered the first person of European descent to enter the Hayfork Valley in 1828. By the 1850s, scores of miners arrived in the Hayfork Valley as they did elsewhere in Trinity County. The valley became the major source of agricultural products in the county. As the turn of the 20th century approached, Hayfork transitioned from an agricultural and mining economy to a timber economy. In the 1930s, the number of small mills in and around the Hayfork Valley grew to 14. After World War II, large mills

replaced the smaller mills. Timber sales from federal lands rapidly dropped after 1990, leading to greater reliance on private timberlands (Trinity County 1996).

Environmental Impacts and Mitigation Measures

a) Historical Resources.

According to research by Natural Investigations Company, the existing buildings on the project site are of modern construction. These structures are not at or nearing historic age, defined as being at least 50 years old (Natural Investigations Company 2018). The project would have no impact on historical resources.

b) Archaeological Resources.

The project site has been disturbed by residential development and cultivation activities, which makes it unlikely that any intact archaeological resources would be uncovered. However, it is conceivable that ground disturbance associated with project construction could unearth archaeological materials of significance. The establishment of procedures to address the occurrence of archaeological discoveries would reduce potential impacts to a level that would be less than significant. These procedures are set forth in the following mitigation measure, which was also set forth for the original Use Permit for cultivation activities. Implementation of this mitigation measure would ensure that impacts on uncovered archaeological resources would be less than significant.

Level of Significance: Potentially significant

Mitigation Measures:

CULT-1. If any subsurface cultural or paleontological resources are encountered during project construction, all activities shall be halted within 50 feet of the discovery until a qualified archaeologist or paleontologist, as appropriate, can examine these materials, determine their significance and, if significant, recommend mitigation measures that would reduce potential effects to a level that is less than significant. Such measures could include 1) preservation in place or 2) excavation, recovery and curation by qualified professionals. The project applicant shall be responsible for retaining qualified professionals, implementing recommended mitigation measures, and documenting mitigation efforts in a written report, consistent with the requirements of the CEQA Guidelines.

Significance After Mitigation: Less than significant

c) Human Burials.

Past disturbance of the project site makes it unlikely that any human burials, particularly Native American burials, would be uncovered. Even so, it is conceivable that ground disturbance associated with the project could uncover a previously unknown burial.

CEQA Guidelines Section 15064.5(e) describes the procedure to be followed when human remains are uncovered in a location outside a dedicated cemetery. All work in the vicinity of the find shall be halted and the County Coroner shall be notified to determine if an investigation of the death is required. If the County Coroner determines that the remains are Native American in origin, then the County Coroner must contact the Native American Heritage Commission within 24 hours. The Native American Heritage Commission shall identify the most likely descendants of the deceased Native American, and the most likely descendants may make recommendations on the disposition of the remains and any associated grave goods with appropriate dignity. If a most likely descendant cannot be identified, the descendant fails to make a recommendation, or the landowner rejects the recommendations of the most likely descendant, then the landowner shall rebury the remains and associated grave goods with appropriate dignity on the property in a location not subject to further disturbance.

Compliance with CEQA Guidelines Section 15064.5(e) would ensure that any human remains and associated grave goods encountered during project construction would be treated with appropriate dignity. Project impacts on human remains would be less than significant.

3.6 ENERGY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?			√	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			√	

NARRATIVE DISCUSSION

Environmental Setting

According to the latest information from the U.S. Energy Information Administration (EIA), California consumed 7,830 trillion British thermal units (BTUs) of energy in 2016. Only Texas consumed more energy. However, consumption per capita in California was 197 million BTUs, which was 49th among all states and the District of Columbia. Transportation accounted for approximately 39.8% of the energy consumed in California, followed by industrial with 23.7%, commercial with 18.9%, and residential with 17.7% (EIA 2017). Electricity is a major energy source for residences and businesses in California. In 2016, electricity consumption in California totaled approximately 285,701 gigawatt-hours (GWh) (CEC 2018a). Natural gas is another major

energy source. In 2016, natural gas consumption in California totaled approximately 12,750 million therms (CEC 2018a).

Electrical service to the project site is provided by the Trinity PUD, which serves all of Trinity County except the Big Bar/Big Flat and Hyampom areas. The source of all the PUD's electricity is hydroelectric energy from Trinity Dam (Trinity PUD 2018). A transmission line runs along State Route 3, and the Hayfork Substation is slightly more than one mile west of the project site. The use of electricity by cannabis production varies according to cultivation methods and extent of activities associated with production. According to one study, electricity demands for cannabis production equate to 2,283 kilowatt-hours per kilogram (kWh/kg) yield for lighting, 1,848 kWh/kg for ventilation and dehumidification, 1,284 kWh/kg for air conditioning, 304 kWh/kg for space heating, 173 kWh/kg for water handling, and 90 kWh/kg for drying (Mills 2012).

California has implemented numerous energy efficiency and conservation programs that have resulted in substantial energy savings. The State has adopted comprehensive energy efficiency standards as part of its Building Standards Code, California Codes of Regulations, Title 24. In 2009, the California Building Standards Commission adopted a voluntary Green Building Standards Code, also known as CALGreen, which became mandatory in 2011. CALGreen sets forth mandatory measures, applicable to new residential and nonresidential structures as well as additions and alterations, on water efficiency and conservation, building material conservation, interior environmental quality, and energy efficiency. California has adopted a Renewables Portfolio Standard, which requires electricity retailers in the state to generate 33% of electricity they sell from renewable energy sources (i.e., solar, wind, geothermal, hydroelectric from small generators, etc.) by the end of 2020. In 2018, SB 100 was signed into law, which increases the electricity generation requirement from renewable sources to 60% by 2030 and requires all the state's electricity to come from carbon-free resources by 2045.

Environmental Impacts and Mitigation Measures

a, b) Project Energy Consumption and Consistency with Energy Plans.

The main sources of energy consumption would be construction activities and project operations. Project construction would involve fuel consumption and use of other non-renewable resources. Construction equipment used for such improvements typically runs on diesel fuel or gasoline. The same fuels typically are used for vehicles that transport equipment and workers to and from a construction site. However, construction-related fuel consumption would be finite, short-term and consistent with construction activities of a similar character. This energy use would not be considered wasteful, inefficient or unnecessary.

Electricity may be used for equipment operation during construction activities. It is expected that more electrical construction equipment would be used in the future, as it would generate fewer air pollutant and GHG emissions. This electrical consumption would be consistent with construction activities of a similar character; therefore, the use of electricity in construction activities would not be considered wasteful, inefficient or unnecessary, especially since fossil fuel consumption would be reduced. Moreover, under

California's Renewables Portfolio Standard, a greater share of electricity would be provided from renewable energy sources over time, so less fossil fuel consumption to generate electricity would occur.

The project would be required to comply with the building energy efficiency standards of California Code of Regulations Title 24, Part 6, also known as the California Energy Code, adopted by the County at the time of project approval. Compliance with these standards would reduce energy consumption associated with project operations, although reductions from compliance cannot be readily quantified.

Overall, project construction and operations would not consume energy resources in a manner considered wasteful, inefficient, or unnecessary. Project impacts related to energy consumption are considered less than significant. All project components would be consistent with the energy efficiency goals of Title 24. Project impacts would be less than significant.

3.7 GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				√
ii) Strong seismic ground shaking?			√	
iii) Seismic-related ground failure, including liquefaction?			√	
iv) Landslides?			√	
b) Result in substantial soil erosion or the loss of topsoil?		√		
c) Be located on strata or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				√
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial direct or indirect risks to life or property?			√	

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

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

		√	
	√		

NARRATIVE DISCUSSION

Environmental Setting

Trinity County lies within the Klamath Mountain Province, which is at the junction of the uplifted Coast Ranges, the volcanic Cascade Range, and the ancient volcanic roots of the Sierra Nevada. The project site lies in a river terrace at the toe of a mountain slope, with topography ranging from moderately steep north-facing slopes to flat floodplains. There are three soil types on the project site (USDA NRCS 1998):

- Atter-Dumps, Dredge Tailings – Xerofluvents Complex. Found mainly at the center of the project site, this soil type is on alluvial fans, stream terraces, and floodplains that have been altered by dredging operations. Atter soils are deep and somewhat well-drained with rapid permeability. Runoff is slow, and the water erosion hazard is slight. Dredge tailings have similar characteristics to Atter soils except that runoff is medium. Xerofluvents are well-drained soils with medium or rapid permeability. Runoff is slow or medium, and the water erosion hazard is slight or moderate.
- Holkat-Hooskimbim Complex, 50 to 75 percent slopes. Found in the southeast corner of the project site. Holkat soils are moderately deep, well-drained soils with moderate permeability. Runoff is very rapid, and the water erosion hazard is severe. Hooskimbim soils are deep, well-drained soils with moderate permeability. Runoff is rapid, and the water erosion hazard is severe.
- Xerofluvents-Riverwash Complex, 0 to 5 percent slopes – Found in the area near Hayfork Creek, this soil type is on floodplains and stream terraces. Xerofluent characteristics are described under the first soil type listed above. Riverwash consists of nearly barren, unstabilized, stratified sandy, silty, clayey, stony, cobbly, or gravelly alluvium.

Trinity County has historically experienced very low levels of seismicity and has a relatively low seismic risk compared to the rest of California. The greatest potential for earthquake-related damage to occur arises from large earthquakes located elsewhere, particularly from Humboldt County (Trinity County 1996). Landslides are considered a potential geological hazard in the County, particularly in areas with steep slopes, periodic rains, and vegetation loss (Trinity County 2014).

Environmental Impacts and Mitigation Measures

a-i) Fault Rupture Hazards.

The project site is not on or near a known earthquake fault, according to the criteria of Alquist-Priolo Special Studies Zones Act or as delineated on a seismic hazard zone map prepared under the Seismic Hazards Mapping Act. The nearest earthquake fault is the Grogan fault, approximately 20 miles to the west (Natural Investigations Company 2018). The project would have no impact related to fault rupture hazards.

a-ii) Seismic Ground Shaking.

The Hayfork Community Plan states that a large earthquake (magnitude 7.0 or higher) in Humboldt County would result in strong ground shaking in Hayfork. Most small, wood-frame structures would hold up well under moderate ground shaking, but older structures could experience extensive damage due to inadequate foundation systems and other structural supports. Water lines could rupture, and temporary power losses are likely (Trinity County 1996).

The project site has existing structures and a water system. These structures are unlikely to experience significant damage from ground shaking that would likely result from a large earthquake in Humboldt County. New structures proposed by the project would be similar in construction to existing structures, and new structures must comply with applicable provisions of the County Building Code, which includes seismic safety provisions. Project impacts related to ground shaking would be less than significant.

a-iii) Other Seismic Hazards.

The project site is not expected to experience other seismic hazards outside of ground shaking. Liquefaction typically occurs with sandy soils near water sources. The soil on the project site is primarily a gravelly loam, which is less conducive to liquefaction. Project impacts related to other seismic hazards would be less than significant.

a-iv) Landslides.

The Hayfork area is relatively stable and has had little landslide activity compared to other areas in the County. Recorded landslides have occurred at the extreme edges of the Hayfork Community Plan area (Trinity County 1996). No landslides have been recorded at or near the project site. The area where project construction would occur is relatively level. The southern portion of the project site, where no construction is proposed, has elevated slopes, but trees and other vegetation cover this area, which reduces the likelihood of landslides. Project impacts related to landslides would be less than significant.

b) Soil Erosion.

As noted, the Holkat-Hooskimbim Complex has a high potential for water erosion. Project construction is anticipated to occur mainly on this soil type. Construction activities could disturb these soils, making them more susceptible to water erosion. The

initial elements of the project would involve small amounts of construction disturbance, limited to the proposed manufacturing area and associated road and parking improvements. These areas are not expected to exceed one acre in area. Construction of proposed greenhouses may require disturbance of more than an acre, which could trigger additional water quality protection requirements.

Mitigation Measure GEO-1 would require a grading, drainage, and erosion control plan be prepared and implemented to reduce soil erosion. If construction activities would disturb more than an acre of land area, the applicant would also need to comply with the State's Construction General Permit for storm water. If required, compliance would require preparation of a Storm Water Pollution Prevention Plan (SWPPP) by a Qualified SWPPP Developer; the SWPPP would include implementation of Best Management Practices to avoid or minimize adverse water quality impacts from erosion and sedimentation. Best Management Practices fall within the categories of Temporary Soil Stabilization, Temporary Sediment Control, Wind Erosion Control, Tracking Control, Non-Storm Water Management, and Waste Management and Materials Pollution Control.

With implementation of this mitigation measure, project impacts related to erosion would be reduced to a level that would be less than significant.

Level of Significance: Potentially significant

Mitigation Measures:

GEO-1. A grading, drainage, and erosion control plan shall be submitted to and approved by the County Planning Department prior to the start of construction activities. In the event that construction would involve more than an acre of disturbance, the project will require compliance with the State's General Construction Permit for storm water. The plan shall be prepared by a qualified Storm Water Pollution Prevention Plan Developer and shall incorporate standard erosion control practices and Best Management Practices. The project applicant shall file a Notice of Intent with the North Coast Regional Water Quality Control Board (RWQCB).

Significance After Mitigation: Less than significant

c) Unstable Soils.

Dioritic soils are found east and west of Hayfork. These soils, which have the same characteristics as decomposed granitic soils, are unstable and highly erodible (Trinity County 1996). The project site is not in an area of dioritic soils or an area identified as having unstable soils. The project would have no impact related to unstable soils.

d) Expansive Soils.

According to the Soil Survey of Trinity County (NRCS 1998), the shrink-swell potential of all three soil types on the project site is low. Given this and the requirement of project

construction to comply with the adopted County Building Code, project impacts related to expansive soils would be less than significant.

e) Adequacy of Soils for Wastewater Disposal.

The Soil Survey of Trinity County (NRCS 1998) indicates that all three soil types on the project site have severe constraints related to sanitary facilities. Specifically, the Holkat-Hooskimbim Complex, the soil on which the project would be constructed, has severe constraints due to slopes and depth to rock.

Permit applications for two septic systems were approved by the County Environmental Health Division. Approval of the permit applications was based on soils percolation data submitted by the applicant indicating a percolation rate of 120 minutes per inch into the rocky clay loam soil of the disposal site. The application indicated that all required separation distances between the proposed systems and surface water resources would be met. The applications identified a potential sewage loading of up to 40 employees at one time, equal to the maximum number of proposed employees. Based on the permit approvals by the County Environmental Health Division, the soils on the project site are considered adequate to support the use of the proposed septic systems. Project impacts related to wastewater disposal would be less than significant.

f) Paleontological Resources and Unique Geologic Features.

Past disturbance of the project site makes it unlikely that any intact paleontological resources would be uncovered. However, it is conceivable that ground disturbance associated with the project could unearth paleontological materials of significance. The establishment of procedures to address the occurrence of paleontological discoveries would reduce any potential impacts to a less than significant level. These procedures are set forth in Mitigation Measure CULT-1, which would ensure that impacts on uncovered paleontological resources would be less than significant.

Level of Significance: Potentially significant

Mitigation Measures: Mitigation Measure CULT-1.

Significance After Mitigation: Less than significant

3.8 GREENHOUSE GAS EMISSIONS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			√	

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

		√	
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NARRATIVE DISCUSSION

Environmental Setting

Background

Greenhouse gases (GHGs) are gases that absorb and emit radiation within the thermal infrared range, trapping heat in the earth's atmosphere. GHGs are both naturally occurring and are emitted by human activity. GHGs include carbon dioxide, the most abundant GHG, as well as methane, nitrous oxide, and other gases. GHG emissions in California in 2016 were estimated at 429.33 million metric tons carbon dioxide equivalent (CO₂e). Transportation was the largest contributor to GHG emissions in California, with approximately 41% of total emissions. Other significant sources include industrial activities and electric power generation (ARB 2018). Increased atmospheric concentrations of GHGs are considered a primary contributor to global climate change, which is a subject of concern for the State of California. Potential impacts of global climate change in California include reduced snowpack, increased wildfire hazards, greater number of hot days with associated decreases in air quality, and potential decreases in agricultural production (Climate Action Team 2010).

Unlike the criteria air pollutants described in Section 3.3, Air Quality, GHGs have no "attainment" standards established by the federal or State government. In fact, GHGs are not generally thought of as traditional air pollutants because their impacts are global in nature, while air pollutants mainly affect the general region of their release to the atmosphere. Nevertheless, the U.S. Environmental Protection Agency has found that GHG emissions endanger both the public health and public welfare under Section 202(a) of the Clean Air Act due to their impacts associated with climate change (EPA 2009).

Regulatory Framework

The State of California has implemented GHG emission reduction strategies through Assembly Bill (AB) 32, the Global Warming Solutions Act of 2006, which requires total statewide GHG emissions to reach 1990 levels by 2020, or an approximately 29% reduction from 2004 levels. In compliance with AB 32, the State adopted the Climate Change Scoping Plan in 2008 and updated it in 2014. Primary strategies addressed in the original Scoping Plan included new industrial and emission control technologies; alternative energy generation technologies; advanced energy conservation in lighting, heating, cooling and ventilation; fuels with reduced carbon content; hybrid and electric vehicles; and methods for improving vehicle mileage (ARB 2008). The 2014 update highlights California's progress toward meeting the 2020 GHG emission reduction goal of the original Scoping Plan, and it establishes a broad framework for continued emission reductions beyond 2020, on the path to 80% below 1990 levels by 2050 (ARB 2014). In

2016, total GHG emissions in California were approximately two million metric tons CO₂e below the 2020 target (ARB 2018).

In 2016, Senate Bill (SB) 32 was enacted. SB 32 extends the GHG reduction objectives of AB 32 by mandating statewide reductions in GHG emissions to levels that are 40% below 1990 levels by the year 2030. The State has adopted an updated Scoping Plan that sets forth strategies for achieving the SB 32 target. The updated Scoping Plan continues many of the programs that were part of the previous Scoping Plans, including the cap-and-trade program, low-carbon fuel standards, renewable energy, and methane reduction strategies. It also addresses for the first time GHG emissions from the natural and working lands of California, including the agriculture and forestry sectors (ARB 2017). Recently, the State Legislature extended the cap-and-trade program from its original expiration date in 2020 to 2030.

In 2011, the NCUAQMD adopted Rule 111 (Federal Permitting Requirements for Sources of Greenhouse Gases) into its rules, to establish both a threshold above which federal New Source Review and Title V permitting applies and federally enforceable limits on potential to emit GHGs for stationary sources. These are considered requirements for stationary sources, so NCUAQMD states that they should not be used as a significance threshold. Neither the NCUAQMD nor Trinity County has adopted a GHG reduction plan, also known as a Climate Action Plan. However, in the recently updated Safety Element to its General Plan, the County has set a goal of successful mitigation of GHG emissions associated with implementation of the County General Plan. Policies to implement this goal include development of a Climate Action Plan (Trinity County 2014).

Environmental Impacts and Mitigation Measures

a) Project GHG Emissions.

Neither the NCUAQMD nor Trinity County has established CEQA significance thresholds for evaluating the impacts of a project's GHG emissions. Under this circumstance, the NCUAQMD recommends the use of thresholds and guidance provided by other air districts in the State, such as the Bay Area Air Quality Management District (BAAQMD). The BAAQMD has developed project screening criteria to provide lead agencies and project applicants with a conservative indication of whether a project could result in potentially significant impacts related to greenhouse gas emissions. Projects below the applicable screening criteria would not exceed the 1,100 metric tons CO₂e per year GHG threshold established by the BAAQMD for land use projects other than permitted stationary sources.

The GHG analysis assumes that the project would develop approximately 3,360-square foot of floor area for the manufacturing facility, which would make its most significant GHG contributions from refrigeration units for the storage of cannabis, and 3,600 square feet of warehouse storage space. The analysis also assumed that an additional 41,950 square feet of greenhouse space would be developed to accommodate 33,560 square feet of future cannabis cultivation (33,560 X 1.25). For construction impacts, the BAAQMD screening project size is 259,000 square feet for manufacturing uses. For operational

impacts, the BAAQMD screening project size is 89,000 square feet for manufacturing uses (BAAQMD 2017). Since the proposed project is well below these screening criteria, emissions from construction and operation of the project are considered less than significant.

As noted above, electricity consumption is a major source of indirect GHG emissions. The Trinity PUD provides only hydroelectric energy. Since hydroelectric energy does not generate GHG emissions, project energy usage would not result in indirect GHG emissions from electrical generation. In addition, lighting for an indoor operation can cost from \$800 to \$1,000 per pound of yield, while outdoor cultivation costs from \$150 to \$300 per pound (Evergreen Economics 2016). It is expected that mixed-light cultivation would use less energy for lighting than fully-enclosed indoor cultivation. Project emissions, already considered less than significant, would be further reduced.

b) Consistency with GHG Reduction Plans.

As noted in a) above, the proposed project could generate both direct and indirect GHG emissions. Neither the NCUAQMD nor the County currently have adopted plans for reducing GHG emissions, but the County General Plan has GHG policies.

The project is subject to a myriad of state regulations applicable to project design, construction, and operation that would reduce GHG emissions, increase energy efficiency, and provide compliance with the Climate Change Scoping Plan (ARB 2017). The State of California has the most comprehensive GHG regulatory requirements in the United States, with laws and regulations requiring reductions that affect project emissions. Legal mandates to reduce GHG emissions from vehicles, for example, would reduce project-related vehicular emissions. Other mandates that would reduce GHG emissions include reducing per capita water consumption and imposing waste management standards to reduce methane and other GHGs from solid wastes.

In addition to the existing State regulatory requirements, the proposed cannabis manufacturing facility in the vicinity of Hayfork would provide a closer location for nearby agricultural operations to bring their cannabis material for processing, thereby reducing vehicle miles traveled by farm owners and their employees who otherwise might travel greater distances for such service. The reduced miles traveled, in turn, would reduce vehicle GHG emissions.

Based on the information provided above, plus the use of hydroelectric power only that was noted in a) above, the project would be consistent with GHG reduction plans of the State and with County General Plan policies on mitigation of GHG emissions. Project impacts related to consistency with GHG emission reduction plans would be less than significant.

3.9 HAZARDS AND HAZARDOUS MATERIALS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?		√		
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?		√		
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				√
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?		√		
e) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				√
f) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?		√		

NARRATIVE DISCUSSION

Environmental Setting

Natural Investigations Company queried two hazardous material site databases in January 2018: the EnviroStor database, maintained by the DTSC; and the GeoTracker database, maintained by the SWRCB. Neither database had a record of any hazardous material cases associated with the project site. The nearest recorded site is the former Sierra Pacific lumber mill, across Hayfork Creek to the west of the project site (Natural Investigations Company 2018).

The threat of catastrophic fire is probably the most significant hazard in the Hayfork area (Trinity County 1996). According to the California Department of Forestry and Fire Protection (CalFire), 105 wildfires occurred in Trinity County between 1999 and 2009, with approximately 433,835 acres burned. The 2008 season alone affected 265,000 acres, generating 17 weeks of severe smoke impacts and causing the loss of 10 lives (Trinity County 2014). The 2007 Wallow Fire, seven miles southwest of Hayfork, burned 1,440

acres (CalFire 2018). More recently, in 2018, the Carr Fire burned a portion of eastern Trinity County.

Environmental Impacts and Mitigation Measures

a) Hazardous Materials Transportation, Use and Disposal.

Cannabis cultivation operations, including nursery operations if they are established, would involve the use of pesticides, fertilizers, and other agricultural chemicals, along with diesel fuel for the backup generator. Pesticides that would be used include pyrethins and “Suffoil-X,” both approved for use on cannabis by the State. The specific fertilizers and chemicals that would be used in cultivation are proprietary technical information that cannot be publicly released. The proposed manufacturing facility would use materials considered hazardous, including butane and ethanol. Routine transport, handling, use, and disposal of these types of materials could expose people to hazards if adequate precautions are not taken.

Under the CalCannabis Licensing Program by CDFA, cultivators would be required to store, use, and dispose of hazardous materials in accordance with a broad range of applicable laws and regulations. The project applicant has indicated the products to be used for cultivation are compliant with all CDFA rules and regulations. Diesel fuel is stored on-site in an existing 500-gallon tank. Diesel would be used for vehicle fueling as well as for the backup electrical generator, which has a 100-gallon on-board capacity.

The proposed project would use butane for the proposed cannabis manufacturing processes. Butane storage would occur in a controlled area inside the manufacturing building accessible only to authorized lab staff with RFID cards. Butane storage would include one gas containment cylinders in the lab containing 100 pounds of butane. An additional five cylinders would be stored in a secure outdoor area. Cylinders would be equipped with pressure relief valves, an overflow protection device and secondary pressure relief valve.

Ethanol also would be used in the cannabis manufacturing process. Ethanol is shipped in intermediary bulk containers (totes) that hold approximately 275 gallons. Manufacturing operations would involve the use of one tote (275 gallons), which would be located inside the controlled area of the manufacturing building accessible only to authorized staff with RFID cards. An additional two totes would be located in the secure outdoor storage area.

Both butane and ethanol containers would be stored on anti-static mats, and all employees would use anti-static mats prior to entering the lab work area. The storage area would be equipped with a volatile gas sensor wired to a general alarm area in case of storage tank failure. The storage area would include an outdoor concrete pad enclosed with cyclone fencing and equipped with RFID locks. The storage area would be surrounded by bollards to prevent vehicle impact.

Depending on the size of the cultivation facility and nature of activities, licensees may be required to prepare a Hazardous Material Business Plan. Additionally, licensees would be required to comply with federal and State Occupational Safety and Health Administration

requirements, such as maintaining Safety Data Sheets for each chemical they use and providing personal protective equipment, as necessary, to protect the health of workers. The County cultivation ordinance requires substances toxic to children, pets, or wildlife to be stored in a secure and locked structure or device. All use of pesticide products shall comply with State pesticide laws and regulations, enforced by the County Agricultural Commissioner's Office, the County Environmental Health Division, and the California Department of Pesticide Regulation.

As noted in Chapter 2.0, Project Description, the County manufacturing ordinance requires application to the CUPA, which for Trinity County is the DTSC. The CUPA administers a program that consolidates the administration, permit, inspection, and enforcement activities of the environmental and emergency management programs such as the Hazardous Material Business Plans and the Hazardous Material Management Plan and Hazardous Material Inventory Statements, among other programs.

Project site activities that would transport, use, or store hazardous materials would be required to do so in compliance with applicable local, State, and federal hazardous material regulations. Compliance with these regulations, along with the requirements of CDFA and the CUPA, would reduce impacts regarding the transport, use, and storage of hazardous materials to a level that would be less than significant.

b) Release of Hazardous Materials by Upset or Accident.

The presence of hazardous materials that would be used by the project would create the potential for on-site releases of these materials. Employees and other persons could be exposed to hazardous material releases through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. The main concern would be employee exposure; the size of the project site would make it unlikely that any releases of hazardous materials would extend beyond site boundaries.

The manufacturing operation proposes to use a hydrocarbon extraction process that involves butane and ethanol, which are flammable substances. For Type 7 license facilities, the County ordinance states that extractions must be in a "closed loop" system as defined and prescribed by the State of California. A "closed loop" system is one in which the solvent used in the extraction is not exposed to the outside atmosphere. The "loop" portion refers to the recovery and reuse aspect of the system. The solvent will start inside one vessel, and then move through another containing botanical material, after which it will return into the original vessel, hence creating a "loop." Solvents, such as butane and ethanol, would be less likely to be released into the air, and the possibility of explosion would be reduced. Employees and other persons would not be exposed to these substances.

As noted in Chapter 2.0, Project Description, the butane and ethanol would be stored in gas containment cylinders and totes as discussed above. Extra stock of these materials would be stored outside the building in a locked cage with bollards protecting the cage from accidental vehicle contact. This would reduce the likelihood of an accidental release of these substances into the local environment.

For manufacturing activities, CDPH licensing requires a hazard analysis that includes identification of chemical and other hazards. The licensee also shall identify and implement written preventive controls to provide assurance that any hazards requiring a preventative control will be significantly minimized or prevented such that the manufactured cannabis product is not adulterated or misbranded. Also, the County cannabis manufacturing ordinance requires that any employees operating potentially hazardous equipment shall be trained on the proper use of the equipment and on the proper hazard response protocols in the event of equipment failure.

As noted in a) above, the ordinance requires application to the CUPA (i.e., the DTSC), which is responsible for the administration of programs such as the California Accidental Release Prevention Program, Area Plans for Hazardous Materials Emergencies, and the Hazardous Material Business Plans. The CUPA includes inspection and enforcement provisions to ensure that requirements set forth in the applicable programs are observed.

Also, project site activities that would transport, use, or store hazardous materials would be required to do so in compliance with applicable local, State, and federal regulations. These regulations are designed to ensure that these materials are properly stored and transported, thereby reducing the likelihood of accidental release. Compliance with these regulations, along with the requirements of CDFA and the CUPA, would reduce project impacts related to potential release of hazardous materials to a level that would be less than significant.

c) Release of Hazardous Materials near Schools.

The nearest school to the project site is Hayfork High School, which is approximately 1.3 miles to the west. Should any release of a hazardous material occur on the project site, the material is not expected to reach the high school, given this distance. The project would have no impact on schools related to hazardous material releases.

d) Hazardous Materials Sites.

As noted, neither the GeoTracker nor the EnviroStor databases have any records of contamination associated with the project site. A site survey revealed no evidence of buried storage tanks or soil contamination. There was no indication that the parcel has previously been used for an industrial purpose. Project impacts related to hazardous material sites would be less than significant.

e) Emergency Response and Evacuation.

The project proposes no changes to Morgan Hill Road, which would be the main road for emergency vehicle access and for evacuations. No obstructions or other alterations that could hinder access would be installed. The project would follow provisions of the Fire Safe Ordinance that pertain to access for emergency vehicles (see below). The project would have no impact on emergency response and evacuations.

f) Wildland Fire Hazards.

The project proposes the installation of structures in an area designated as a High Fire Severity Zone by CalFire. As such, the structure and employees working therein are potentially subject to a wildfire hazard. The presence of woodland near the planned development site increases this potential hazard.

The County has enacted a Fire Safe Ordinance (Trinity County Code Chapter 8.30) to establish minimum wildfire protection standards in conjunction with building, construction and development in Trinity County. Provisions of this ordinance include standards for defensible space and access roads and driveways, and provision of emergency water supply. Compliance with the Fire Safe Ordinance would reduce the risk of wildfire damage to the proposed structures to a level that would be less than significant.

3.10 HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?		√		
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			√	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) Result in substantial erosion or siltation on- or off-site?			√	
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?			√	
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?			√	
iv) Impede or redirect flood flows?				√
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				√
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			√	

NARRATIVE DISCUSSION

Environmental Setting

Surface and Groundwater Hydrology

The project site is part of the Trinity River Hydrologic Unit, which covers approximately 2,970 square miles and is part of the larger Klamath River Basin (North Coast RWQCB 2018). The project site contains one surface water feature – an existing man-made pond that fills with rainwater. Hayfork Creek, a perennial stream, flows along the north and west edges of the project site, eventually discharging into the South Fork of the Trinity River. The main source of water for Hayfork Creek is rainfall, which occurs primarily between the months of October and April. Some significant contributions from snowmelt occur during the late winter and spring. Hayfork Creek receives flows from several tributaries, including Big Creek, which discharges into Hayfork Creek near the project site. Peak flows on Hayfork Creek occur during the winter, while the lowest flows occur during the months of August and September (Trinity County 1984).

The project site is within the Hayfork Valley Groundwater Basin. The Hayfork Valley Groundwater Basin is an irregularly shaped basin trending east-west along Hayfork Creek. Domestic wells in the basin vary in depth from 24 to 304 feet (DWR 2004). The groundwater aquifer underlying the project site consists of coarse river alluvium reworked by dredge mining. The depth to groundwater at a site adjacent to and west of the project site varies from more than 20 feet near State Route 3 to between 10 and 12 feet closer to Hayfork Creek. The aquifer is recharged by a combination of precipitation and off-site groundwater flows; Hayfork Creek and nearby Big Creek may also contribute to recharge (Trinity County 1984).

An existing groundwater well on the project site was installed in 2011. The well report filed with the County that year indicated that drilling went down 185 feet from ground surface before encountering water. It estimated the well yield at 100 gallons per minute; a one-hour pump test reported no drawdown. The producing strata is a gravel layer located more than 160 feet below the ground surface. The California Department of Fish and Wildlife has found that the well yield is independent of Hayfork Creek surface flows.

The Hayfork Community Plan states that the underground water supply of the Hayfork Creek Drainage, which includes the project site, is severely limited. Most wells in the Hayfork watershed are shallow wells that are linked to surface water supplies, and many of these wells dry up or suffer reduced flows during summer months and/or drought conditions. Some deep wells exist, but water from these wells is often limited to household use (Trinity County 1996). However, information in the Department of Water Resources Bulletin 118 states that the estimated storage capacity of the Hayfork Valley Groundwater Basin is 1,500 acre-feet (DWR 2004).

In 2014, the California Legislature passed the Sustainable Groundwater Management Act, the purpose of which is to give local agencies greater authority to manage groundwater supplies. The legislation requires the formation of local groundwater sustainability agencies (GSAs) that must assess conditions in their local water basins and

adopt locally-based management plans. Local groundwater sustainability agencies for High and Medium priority basins are to be formed by June 30, 2017. Under the Sustainable Groundwater Management Act, groundwater sustainability plans for critically overdrafted basins must be adopted by January 31, 2020, while groundwater basins designated as High or Medium priority must adopt plans by January 31, 2022. The Hayfork Valley Basin was identified as a groundwater basin with a Very Low priority; thus, no GSA or groundwater sustainability plan is required.

Water Quality

The Water Quality Control Plan for the North Coast Region (Basin Plan), updated July 2018, contains the regulations adopted by the North Coast RWQCB to control the discharge of waste and other controllable factors affecting the quality of waters of the state within the boundaries of the North Coast Region. In the past, Hayfork has been identified as a community with serious water quality problems (Trinity County 1996), but there is no indication of such problems in the current Basin Plan. Hayfork Creek is not on a list of impaired water bodies maintained as required under the federal Clean Water Act Section 303(d). The creek does have objectives established in the Basin Plan for conductance, pH, hardness, and boron (North Coast RWQCB 2018).

Cannabis cultivation is subject to North Coast RWQCB Order No. 2015-0023, Waiver of Waste Discharge Requirements and General Water Quality Certification for Discharges of Waste Resulting from Cannabis Cultivation and Associated Activities or Operations with Similar Environmental Effects in the North Coast Region. The order sets standard conditions for all cannabis cultivators for site maintenance, erosion control, riparian and wetland protection and management, water storage and usage, irrigation runoff, and pesticides/herbicides among other issues. For operations classified as Tier 2, additional requirements include preparation of a Water Resource Protection Plan that contains a detailed list of specific management practices designed to meet the standard conditions for all operations, a list of chemicals stored on site and information about their use, water sources and amount used monthly, and a monitoring element.

The SWRCB recently adopted Order WQ 2017-0023-DWQ, General Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities. This order sets general requirements and prohibitions, including the implementation of all applicable best practicable treatment or control measures. It also specifies requirements for water diversions and waste discharges that are similar to the standards specified in the North Coast RWQCB Order described above. The SWRCB Order is intended to replace the North Coast RWQCB Order on July 1, 2019; however, cultivation operations enrolled under the North Coast RWQCB Order as of October 17, 2017 may continue to operate their facilities with that order's setback requirements, unless the RWQCB's Executive Officer determines that these requirements are not protective of water quality.

Water quality is also addressed in the County's Water Quality Control Ordinance (Trinity County Code Chapter 8.60). The ordinance prohibits the use, application, discharge, or disposal of any polluting substance or any other controllable water quality activities if it results in a detectable discharge of polluting substances into the waters of the State located in or flowing through the County. Additionally, the cannabis ordinances adopted

by the County identifies specific requirements for water use and quality, including compliance with SB 94, RWQCB Order No. 2015-0023, and the State's Construction General Permit (2009-0009-DWQ) for construction projects.

Environmental Impacts and Mitigation Measures

a) Violation of Water Quality Standards.

The proposed project would be served by two on-site septic systems that were approved by the County Environmental Health Division in accordance with State Water Quality Control Board standards for on-site sewage disposal. As noted in Section 3.7, Geology and Soils, both systems complied with required minimum setbacks from surface water resources. The cultivation area would use an instrumented drip irrigation system designed to deliver water to cannabis plants based on need, based on soil moisture monitoring. Cannabis plant irrigation is expected to result in limited, if any, wastewater discharge.

The project would be required to comply with the water quality orders of the North Coast RWQCB and SWRCB as noted in Chapter 2.0, Project Description. In addition, Mitigation Measure GEO-1 would require compliance with the applicable requirements of the Construction General Permit, which would include preparation of a SWPPP that would reduce potential erosion and subsequent sedimentation of streams for projects involving more than an acre of disturbance. Also, SB 94 has provisions regarding surface water use with which the project must comply, as specified in the County cultivation ordinance. Project impacts related to water quality standards would be less than significant.

With the implementation of RWQCB Order No. 2015-0023, or SWRCB Order WQ 2017-0023-DWQ if applicable, and the standard conditions applied to the project through Conditions of Approval provided by the various County cannabis ordinances, as well as implementation of the Construction General Permit conditions, the proposed project would have impacts on water quality that would be less than significant.

The latitude and longitude identified on the elevation certificate submitted to the County put the location of the approved septic systems about 15 feet above the base flood elevation. The coordinates on the elevation certificate were taken at the location proposed for greenhouses that have since been built. The coordinates are within a few feet of proposed septic installation. The County has confirmed that the proposed locations of septic installation are well above the base flood elevation; the base elevation certificate is available in Appendix D. As such, the project septic systems should not have an adverse impact on the water quality of nearby Hayfork Creek. Project impacts on water quality would be less than significant.

Level of Significance: Potentially significant

Mitigation Measures: Implementation of Mitigation Measure GEO-1.

Significance After Mitigation: Less than significant

b) Groundwater Supplies and Recharge.

The project proposes to use groundwater from an existing on-site well to supply water for the operations. Total current water consumption from this well is about 2,000 gallons per week, of which 300 gallons is for domestic use and 1,700 gallons per week is for cannabis irrigation (Natural Investigations Company 2018). Well yield required to support this usage would amount to approximately 0.2 gallons per minute.

The applicant estimates total water demands for the proposed cannabis operations as shown below. The right-hand column indicates the required well yield support the estimated usage.

Irrigation	132,579 gallons per month
Evaporative Cooling (May-September)	42,000 gallons per month
Type 7 Processing	1,200 gallons per month
Employee Usage	13,500 gallons per month
General Maintenance	5,000 gallons per month
TOTAL	194,279 gallons per month, 4.5 gallons per minute

As these estimates are relatively conservative, actual consumption could be less depending on the arrangement of the operation and the irrigation system used. The estimated water usage by the project is a small percentage of the estimated storage capacity of the groundwater basin. Additionally, as part of the cannabis cultivation license process administered by the County, applicants are required to provide evidence of sufficient water supply (e.g., documentation of water rights/diversion, proof of permitted well and well report documenting gallons per-minute and recovery rate). Estimated project use would amount to approximately 4.5% of the estimated well yield in a month.

The project proposes additional structures that would increase the impervious surface on the project site, thereby reducing potential groundwater recharge area. However, the project site consists of a 40-acre parcel, the majority of which would remain undeveloped. Project development is not expected to significantly affect existing percolation that occurs. Project impacts related to groundwater would be less than significant.

c-i, ii) Drainage Patterns.

The project proposes the addition of a cannabis manufacturing facility, along with a cultivation area and a nursery. The presence of these facilities may slightly alter drainage patterns on the project site, but not to an extent that it would increase erosion or off-site flooding. As discussed in e) below, any additional runoff can be accommodated on site. Project impacts on drainage patterns would be less than significant.

c-iii) Runoff.

In general, runoff on the project site either enters the man-made pond or Hayfork Creek, or percolates into the ground. As noted, the area of impervious surface on the project site would increase. Additional impervious surface would generate additional runoff. However, the additional impervious surface would be small compared with the total acreage on the project site. The incremental runoff generated by the additional impervious surface can be accommodated by the existing pond or would percolate in the undeveloped portion of the site. Runoff is not expected to reach Hayfork Creek in an amount that would cause flooding concerns. Project impacts related to runoff would be less than significant.

c-iv) Flood Flows.

Much of the area along Hayfork Creek is within a 100-year floodplain as designated by the Federal Emergency Management Agency (FEMA). Much of the project site along Hayfork Creek is within Zone A, which delineates the 100-year floodplain. Much of the project site beyond Zone A is within Zone X, which indicates an area subject to a 500-year flood (FEMA 2010). Many of the proposed project structures are within the 100-year floodplain as outlined in the approved FEMA map. However, as noted, the project was determined by the County to be above the base flood elevation. As a result, the project would not impede or redirect flood flows in a manner that would threaten adjacent land uses. The project would have no impact related to flood flows.

d) Release of Pollutants in Flood Zone.

As noted, project facilities would be above the base flood elevation. Also, project facilities would be set back from Hayfork Creek. There are no levees in the Hayfork area. California Government Code Section 65302(g) requires local governments to assess the potential impacts a dam failure might have on their jurisdiction. In Hayfork, the only dam that requires such review is at Ewing Reservoir north of Hayfork. The project site is outside the potential inundation area of Ewing Reservoir (Trinity County 1996). The project site is neither near a large body of water nor on the coast, so it would not be subject to any seiche or tsunami hazards. Given that the project site is unlikely to be inundated, the project is unlikely to release any pollutants from flooding. Project impacts would be less than significant.

e) Conflict with Water Quality or Sustainable Groundwater Plans.

The project would be required to comply with the water quality orders of the North Coast RWQCB and SWRCB. Compliance with these orders would ensure that the project would not conflict with the objectives of the Basin Plan. As noted, the Hayfork Valley Basin was identified as a groundwater basin with a Very Low priority; thus, no GSA or groundwater sustainability plan is required. Project impacts related to water plans would be less than significant.

3.11 LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?				√
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			√	

NARRATIVE DISCUSSION

Environmental Setting

The project site is near the community of Hayfork in southern Trinity County. As described in Section 3.5, Cultural Resources, the Hayfork economy mainly centered around lumber and mining, but both activities have declined. As noted in Chapter 1.0, Introduction, the Hayfork Valley has become one of the areas in the County where cannabis operations have concentrated. Most uses surrounding the project site are rural residential and agricultural. The parcel on which the project site is located is moderately forested in its southern portion, and heavily forested land is south of the parcel. The project site is adjacent to and east of the now-closed Sierra Pacific lumber mill, across Hayfork Creek.

The Trinity County General Plan provides guidance for development within Trinity County and its communities. The project site is within the boundaries of the Hayfork Community Plan, which provides a framework to guide development in the Hayfork area. The Hayfork Community Plan is part of the County General Plan; as such, it is consistent with County land use designations and zoning. As noted in Section 3.2, Agriculture and Forestry Resources, the Community Plan designation for the site is Agriculture, and the project site is zoned A10 – Agriculture, 10-acre minimum.

Environmental Impacts and Mitigation Measures

a) Division of Established Communities.

The project site is in a rural area east of Hayfork. Proposed project activities would occur on a large parcel. The project would have no impact related to division of an established community.

b) Conflict with Applicable Plans, Policies and Regulations Avoiding or Mitigating Environmental Effects.

Unpermitted and/or illegal cannabis cultivation has been reported to conflict with applicable land use plans, policies, or regulations designed to avoid or mitigate

environmental effects. In response, the County has adopted several ordinances related to cannabis activities, including cultivation and manufacture of products. The State licensing programs require that cannabis activities be conducted in accordance with State and local laws and regulations, including local land use plans and zoning ordinances.

The proposed project activities would be on a parcel where cannabis cultivation is already allowed, although any expansion of cultivation will require a variance until permitted by County Code. The project site has a registered cultivation operation under Trinity County Ordinance No. 315-823. The project would establish a cannabis manufacturing operation in accordance with Ordinance No. 315-838, which contains provisions designed to limit environmental effects. The proposed project would involve activities consistent with existing agricultural operations, which are consistent with surrounding land uses and activities. Cannabis cultivation occurs on many properties in the Hayfork area, including two properties to the east. Current activities conform with the County's regulations for the cultivation of medical/recreational cannabis, which under its license requires that cannabis not be cultivated or otherwise placed within 30 feet of any property line.

As discussed in Section 3.2, Agriculture and Forestry Resources, the project proposes a change in zoning from its existing Agriculture to Specific Unit Development (SUD). The change is to accommodate the proposed manufacturing facility. The proposed manufacturing operation would include the processing of harvested cannabis into cannabis oil extract. As such, the operation would be consistent with the cannabis cultivation activities in the area. Also, as previously noted, cannabis cultivation is considered an agricultural activity by the State, and the proposed manufacturing facility would be consistent with the existing cultivation activity on the project site. As explained in Section 3.2, while the zoning would change from its existing Agriculture designation, the project would not hinder potential future agricultural use of the site. The project would not conflict with applicable land use plans, policies, or regulations designed to avoid or mitigate environmental effects. Project impacts would be less than significant.

3.12 MINERAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				√
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				√

NARRATIVE DISCUSSION

Environmental Setting

Historically, mining has played a major role in the economy of Trinity County, including Hayfork, but this activity has declined. The Trinity County General Plan indicates the existence of gold, limestone, and chromite deposits near Hayfork (Trinity County 1973). Mining activity in the Hayfork area as of 1996 consisted of limited gold and some sand and gravel operations. Mining claims had been established on U.S. Forest Service lands along several stream channels. Sand and gravel operations were located mainly along Hayfork Creek (Trinity County 1996). No such operations currently occur on the segment of Hayfork Creek adjacent to the project site.

Both the Open Space and Conservation Elements of the County General Plan identify mineral resource deposits in the County. The Conservation Element contains a recommendation of conserving lands that provide valuable mineral deposits for potential future use.

As mandated by the Surface Mining and Reclamation Act, the California Geological Survey has classified mineral resource development potential of lands in counties into an appropriate Mineral Resource Zone, in accordance with the California Mineral Land Classification System. Local agencies are required to use this information when developing land use plans and when making land use decisions.

Environmental Impacts and Mitigation Measures

a, b) Loss of Mineral Resource Availability.

No mineral resources have been identified on the project site, and there are no active mineral resource operations on or near the site. No Mineral Resource Zones have been designated on or near the project site. The project would have no impact on availability of mineral resources.

3.13 NOISE

Would the project result in:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			√	
b) Generation of excessive groundborne vibration or groundborne noise levels?			√	

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

			✓
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NARRATIVE DISCUSSION

Environmental Setting

Noise is typically defined as airborne sound that is loud, unpleasant, unexpected, or undesired. Effects of noise on people include subjective effects of annoyance, nuisance, and dissatisfaction, to interference with activities such as speech, sleep, and learning. To provide a manageable way to measure sound, the decibel (dB) scale was devised. The perceived loudness of sounds is dependent upon many factors, including sound pressure level and frequency content. However, within the usual range of environmental noise levels, perception of loudness is relatively predictable, and can be approximated by the A-weighting network. There is a strong correlation between A-weighted sound levels (expressed as dBA) and the way the human ear perceives noise.

Community noise is commonly described in terms of the "ambient" noise level, which is defined as the all-encompassing noise level associated with a given noise environment. A common statistical tool to measure the ambient noise level is the average, or equivalent, sound level (L_{eq}), which corresponds to a steady-state, A-weighted sound level containing the same total energy as a time-varying signal over a given time period (usually one hour). The L_{eq} shows very good correlation with community response to noise and it is the basis for other noise descriptors such as the as the Day-Night Average Level (L_{dn}) and the Community Noise Equivalent Level (CNEL). The L_{dn} represents an average sound exposure over a 24-hour period, with noise occurring during the nighttime (10:00 p.m.-7:00 a.m.) weighted an additional 10 dB to account for the greater noise sensitivity to noise at night. The CNEL is the same as the L_{dn} , with an additional +5 dB weighting of noise during the evening hours (7:00 p.m.-10:00 p.m.). Ambient noise levels in the more developed areas of Hayfork were measured on average from 45.6 to 47.8 dB L_{dn} (Trinity County 2003).

The existing noise environment at the project site is dominated by the sound of flowing water in Hayfork Creek. Other noise sources are occasional road traffic, air traffic, wind, and birds (Natural Investigations Company 2018). Talrocca Industries, located on the former Sierra Pacific mill site adjacent to the project site, was considered a potentially significant noise source; however, noise levels generated by this facility were considered minor and would not extend beyond the property line (Trinity County 2003).

The Noise Element of the Trinity County General Plan establishes standards for maximum allowable exposure of noise-sensitive land uses to noise from stationary sources. "Noise-sensitive land uses," as defined by the County, include residential development, schools, churches, libraries, and hospitals and nursing homes among others. Table 3-4 shows the maximum allowable noise exposure, as determined at outdoor

activity areas or at the property line of the receiving land use. For transportation noise sources, the Noise Element sets a maximum allowable exposure of 60 dB L_{dn} for outdoor activity areas in residential land uses, and 45 dB L_{dn} for residential interior spaces (Trinity County 2003).

TABLE 3-4
MAXIMUM ALLOWABLE NOISE EXPOSURE –
STATIONARY NOISE SOURCES

Noise Level Descriptor	Daytime (7 a.m. - 7 p.m.)	Evening (7 p.m. – 10 p.m.)	Nighttime (10 p.m. - 7 a.m.)
Hourly Equivalent sound level (L_{eq}), dB	55	50	45
Maximum sound level (L_{max}), dB	75	70	65

Source: Trinity County 2003.

The County does not have a general noise ordinance. However, County Ordinance No. 315-823 sets noise standards for the commercial cultivation of cannabis. Cultivation activities shall not exceed the noise level standards as set forth in the County General Plan: 55 dBA from 7:00 a.m.-7:00 p.m. and 50 dBA from 7:00 p.m.-7:00 a.m., as measured at the property line. Generators associated with a commercial operation are not to be used between 10:00 p.m. and 7:00 a.m.

Environmental Impacts and Mitigation Measures

a) Exposure to Noise Exceeding Local Standards.

As noted in Section 3.3, Air Quality, the nearest sensitive receptors to the project site are scattered residences, a daycare, a residential subdivision, and Hayfork High School approximately 1.3 miles to the west. The proposed project does not require the prolonged use of mobile generators and does not involve any permanent noisy machinery in outdoor areas. Cultivation within greenhouses will require the use of fans for cooling and supplemental lighting. Small engines such as rototillers and tractors will not be utilized for this operation.

The CalCannabis Licensing Program PEIR concluded that cannabis cultivation activities under the program would not generate a substantial number of vehicle trips, so noise from commuting personnel is not a significant noise source (CDFA 2017). This has been confirmed by use of a noise model based on the Federal Highway Administration Highway Traffic Noise Prediction Model (RD-77-108). Assuming a total traffic volume of 200, double the number expected to be generated by the project (see Section 3.17, Transportation), noise from traffic on Morgan Hill Road with the project would be 45.5 dB L_{dn} at 50 feet from the right-of-way. Since most residences along Morgan Hill Road appear to be located more than 50 feet from the roadway, based on observations and measurements made on Google Earth, the project is not expected to generate traffic noise

at levels that would exceed the standards set in the Noise Element of the County General Plan.

Cultivation activities would be required to comply with the noise provisions of the County cannabis cultivation ordinance, as noted above. While the cannabis manufacturing ordinance does not explicitly set a noise standard for manufacturing facilities, the proposed facility would be subject to the County's noise standards for stationary sources. These noise standards, plus the limited use of noise-generating equipment, would result in impact on sensitive receptors that are less than significant.

Project construction activities would generate a temporary increase in noise levels. As indicated in Table 3-5, activities involved in construction would generate maximum noise levels ranging from 76 to 90 dBA L_{max} at 50 feet. For this project, construction equipment expected to be used include backhoes, dozers, excavators, and dump trucks.

TABLE 3-5
CONSTRUCTION EQUIPMENT NOISE LEVELS

Type of Equipment	Maximum Level, dBA at 50 feet
Auger Drill Rig	84
Backhoe	78
Compactor	83
Compressor (air)	78
Concrete Saw	90
Dozer	82
Dump Truck	76
Excavator	81
Generator	81
Jackhammer	89
Paver	77
Pneumatic Tools	85

Source: FHWA 2006.

The noise level at a given distance from a source can be estimated using the Inverse Square Law of Noise Propagation. Essentially, this law states that noise decreases by 6 dBA with every doubling of distance from a source (Harris 1991). Thus, the noise level 50 feet from a source decreases by 6 dBA at 100 feet, and by 6 dBA again at a distance of 200 feet. The main construction work would be at the proposed site of the manufacturing facility, which would occur at a distance of approximately 550 feet from the nearest apparent residence. The noisiest construction equipment that would likely be used – the dozer – generates 82 dBA at 50 feet. At that distance, noise from the dozer as experienced at the residence would be less than 64 dBA, below the maximum sound level

allowed from stationary sources. Construction noise would be temporary and would cease once work is completed. Project impacts related to temporary noise increases would be less than significant.

b) Groundborne Vibration.

Groundborne vibration is not a common environmental problem. Some common sources are trains, buses on rough roads, and construction activities such as blasting, pile-driving and operating heavy earth-moving equipment. Construction vibration impacts include human annoyance and building structural damage. Human annoyance occurs when construction vibration rises significantly above the threshold of perception.

Construction impacts on the project site would be temporary and would cease when work is completed. It is not anticipated that heavy construction equipment would be used. Also, the work would occur within a large parcel, so it is unlikely that any vibrations would travel beyond property lines to any sensitive land uses, particularly since identified sensitive receptors are one mile away. Project impacts related to groundborne vibrations would be less than significant.

c) Exposure to Airport/Airstrip Noise.

The nearest airstrip or airport to the project site is Hayfork Airport, approximately 1.5 miles to the west of the Project Area. The Trinity County Airport Land Use Compatibility Plan indicates that the project site is outside land use compatibility zones established around Hayfork Airport, and it is not within any designated overflight paths. The Airport Land Use Compatibility Plan has designated noise contours around Hayfork Airport. The outermost contour is 60 dB CNEL (Trinity County 2009). The project site is well beyond this contour. There are no private airstrips in the vicinity. The project would have no impact related to airport or airstrip noise.

3.14 POPULATION AND HOUSING

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			√	
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				√

NARRATIVE DISCUSSION

Environmental Setting

As of January 1, 2018, the population of Trinity County was estimated at 13,635 (California Department of Finance 2018). The population of Hayfork, as determined by the 2010 U.S. Census, was 2,368 (U.S. Census Bureau 2010). Trinity County had an estimated 8,892 housing units as of January 1, 2018. Single-family detached units accounted for approximately 66.6% of total housing units in the County, with mobile homes accounting for 25.1% (California Department of Finance 2018). As of 2010, there were 1,213 housing units in Hayfork (U.S. Census Bureau 2010).

Environmental Impacts and Mitigation Measures

a) Population Growth Inducement.

The project proposes a cannabis manufacturing facility on an existing cultivation site. Cultivation activities currently employs one to two persons. Assuming a proportional increase, the expanded cultivation would result in a total of three to six employees. According to the project applicant, the manufacturing operation would employ a maximum of 12 people. For the nursery, an additional four employees are assumed, based on an estimate for a proposed cultivation/nursery operation in Hayfork. The estimated number of employees for the proposed project would be 22 at maximum.

While the project is expected to generate additional employment, most employees would likely be drawn from existing residents in the Hayfork area or in Trinity County. The project would not create new roads, water lines, wastewater lines or other infrastructure. Instead, it would make use of the existing infrastructure, including an on-site well. Because of this, the project is not expected to directly induce substantial population growth or encourage further development in the area. Project impacts on population growth would be less than significant.

b) Displacement of Housing and People.

There is an existing residence on the project site, but it would not be removed. The project would not displace housing or people. The project would have no impact related to displacement.

3.15 PUBLIC SERVICES

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

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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i) Fire protection?

ii) Police protection?

iii) Schools?

iv) Parks?

v) Other public facilities?

		√	
		√	
			√
			√
			√

NARRATIVE DISCUSSION

Environmental Setting

Fire protection services in the Hayfork area are provided by the Hayfork Fire Department, a volunteer fire department whose service area covers approximately 84 square miles. The Fire Department operates from its station on Hyampom Road. Fire protection services in the Hayfork area are also provided by Cal Fire and the U.S. Forest Service. These two agencies, along with the Hayfork Fire Department, participate in a mutual aid response program.

Police protection services are provided by the Trinity County Sheriff's Department, based in Weaverville. A substation of the Sheriff's Department is in Hayfork. The California Highway Patrol provides services focused on traffic safety.

The project site is within the boundaries of the Mountain Valley Unified School District, formed in 1987. The District includes Hayfork Elementary School and Hyampom Elementary School in the community of Hyampom, both serving kindergarten to 8th grade students. High school students in the District attend Hayfork High School.

Parks in the Hayfork area are provided and maintained by the Greater Hayfork Valley Park and Recreation District. Section 3.15, Recreation, provides more information on parks and recreational facilities in the Hayfork area. Other public facilities include a branch of the Trinity County Library on Hyampom Road.

Environmental Impacts and Mitigation Measures

a-i) Fire Protection.

Cultivation activities have the potential to generate calls for fire protection service, such as the storage and use of flammable materials and the use of power equipment. This potential fire risk would not be substantially different from that posed by other agricultural operations that use similar equipment and practices. Electrical service installations in greenhouses are permitted and inspected by the County, which would reduce potential fire risk from faulty electrical equipment.

Manufacturing facilities also present a potential demand for fire protection services. The County manufacturing ordinance requires all Type 7 license building structures to have operational automatic fire sprinklers, which would reduce the risk of a fire spreading from these structures. The County ordinance also requires that manufacturing facilities allow County officials onto the site for inspections, which would ensure compliance with the sprinkler provision.

As has been noted, water on the project site is provided by a well. There are no water lines with fire hydrants in the area. However, an existing on-site pond that collects rainwater would provide a potential water supply for firefighting, assuming it is full. The pond would be accessible by existing gravel roads to firefighting vehicles. Also, the project site is adjacent to Hayfork Creek, which would provide another water source that firefighters could use.

The project was reviewed by the Hayfork Volunteer Fire Department. The Fire Department noted that the manufacturing facility would have a California Wildland Fire-compliant fire suppression system on the exterior, to be serviced by an additional 5,000-gallon dedicated water tank. It also noted that the facility had four dry chemical extinguishers and an adequate amount of hand extinguishers, and that there would be adequate fire truck turnaround once the trees are removed and the road is improved (Spiersch pers. comm.).

In summary, the project is not expected to generate a demand such that new or expanded fire protection facilities that could have a potential environmental impact would be required. Project impacts on fire protection services would be less than significant.

a-ii) Police Protection.

CDPH licensing requirements include preparation of a security plan that describes measures to prevent access to manufacturing premises by unauthorized persons. County ordinances require commercial cannabis cultivators to secure all buildings where cannabis is cultivated or stored to prevent unauthorized entry, and for cannabis manufacturing operations to prepare a security plan that is adequate to restrict access to only those meant to enter and to deter trespass and theft of cannabis or cannabis products. Implementation of the CDPH licensing and County ordinance requirements would likely decrease demand of the proposed manufacturing facilities on police protection resources.

The CalCannabis Licensing Program PEIR concluded that, while some crime associated with licensed cannabis cultivation activities is likely to continue, no information has been found that indicates that the program would increase law enforcement needs overall compared to baseline conditions. If anything, demand may decrease due to a larger number of lawful cultivators and their coordination and cooperation with law enforcement authorities (CDFA 2017). The proposed project would likely have the same impact on law enforcement services.

The project is not expected to generate a demand for police services such that new or expanded police facilities that could have a potential environmental impact would be required. Project impacts on police protection services would be less than significant.

a-iii) Schools.

As described in Section 3.13, Population and Housing, the project is not expected to induce population growth, which is a main factor in demand for school facilities. The project is not expected to generate additional demand for school services or facilities. The project would have no impact on schools.

a-iv) Parks.

The project is not expected to generate additional demand for park services or facilities. The project would have no impact on parks.

a-v) Other Public Facilities.

The project is not expected to generate significant additional demand for other public services or facilities, such as libraries. The project would have no impact on other public services.

3.16 RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				√
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				√

NARRATIVE DISCUSSION

Environmental Setting

As noted in Section 3.14, Public Services, parks in the Hayfork area are provided and maintained by the Greater Hayfork Valley Park and Recreation District. The main recreational facility managed by the District is Hayfork Park, near the center of Hayfork. Hayfork Park has a community swimming pool, tennis courts, baseball/softball fields, barbecue/picnic areas, and a playground.

The Trinity County Fairgrounds, a County-owned facility at the intersection of State Route 3 and Morgan Hill Road, hosts the annual Trinity County Fair and other events, and it offers recreational vehicle and tent campgrounds. Ewing Reservoir, managed by Trinity County Waterworks, offers fishing and facilities for picnicking and hiking. The nearby Shasta-Trinity National Forest lands, managed by the U.S. Forest Service, offer opportunities for camping and picnicking.

Environmental Impacts and Mitigation Measures

a, b) Recreational Facilities.

As described in Section 3.13, Population and Housing, the project is not expected to induce population growth, which is a main factor in demand for recreational facilities. The project is not expected to generate additional demand for recreational services or facilities. The project would have no impact on recreational services.

3.17 TRANSPORTATION

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with an applicable program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			√	
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?			√	
c) Substantially increase hazards to a geometric design feature (e g., sharp curves or dangerous intersections) or incompatible uses (e g, farm equipment)?			√	
d) Result in inadequate emergency access?				√

NARRATIVE DISCUSSION

Environmental Setting

Transportation Facilities

The Hayfork community is served by a road system consisting mainly of local roads and streets. State Route 3 is the main regional highway in the Hayfork area, connecting the community to State Route 299 and Weaverville to the north and to State Route 36 to the south. Hyampom Road connects Hayfork to the community of Hyampom in western Trinity County.

The project site is accessed by a private, gravel driveway off Morgan Hill Road. Morgan Hill Road is a two-lane, paved road that extends from State Route 3 south of the Hayfork Airport to a dead-end east of the project site. Traffic on the segment of Morgan Hill Road near the project site is generally limited to residences in the vicinity. The nearest cross-street is Forest Road 31N17, which heads south off Morgan Hill Road just before the project site. The roads closest to the project site, Josh Lane and Genest Street, are used only for local access to residences and agricultural operations (Natural Investigations Company 2018). The Regional Transportation Plan (RTP) for Trinity County classifies Morgan Hill Road as a “minor collector,” which is a road that provide greater access to more localized destinations for regional traffic but is generally more rural with less traffic than a major collector (Trinity County 2017c). There are no data on average daily traffic volumes on Morgan Hill Road.

Trinity Transit provides bus service in the County. One bus route provides service between Hayfork and Weaverville, and connections are available from Weaverville to other communities, including Redding and Eureka. The RTP indicates that a Class III bike route is designated on Morgan Hill Road from State Route 3 to Oak Street, and a Class II bike lane is on Morgan Hill Road from Oak Street to Kyler Avenue (Trinity County 2017c).

As previously noted, Hayfork Airport is approximately 1.5 miles west of the project site. Hayfork Airport is a general aviation facility with a single runway approximately 4,115 feet in length. A tie-down area and two box hangars are available, but there are no fueling facilities; there is no Fixed Base Operator providing aeronautical services at the airport. The airport serves single-engine aircraft; no scheduled passenger service is provided at the airport (Wallace Environmental Consulting 2015).

Regulatory Framework

The Circulation Element of the Trinity County General Plan, adopted in 2002, sets goals, objectives, and policies related to transportation in the County. Policy 1.6.A of the Circulation Element states that the minimum acceptable Level of Service (LOS) standard for roadway and intersection operation in Trinity County is D. LOS is a measure of traffic flow on roadways and traffic delays at intersections using a scale from A to F, with A representing the best traffic flow or shortest intersection delays and F representing the worst traffic flow or longest intersection delays.

The Trinity County RTP is prepared by the Trinity County Transportation Commission. It serves as the planning blueprint to guide transportation investments in the County involving local, state, and federal funding over the next twenty years. The overall focus of the RTP is directed at developing a coordinated and balanced multi-modal regional transportation system that is financially constrained to the revenues anticipated over the life of the plan. The RTP is updated every five years (Trinity County 2017c).

Environmental Impacts and Mitigation Measures

a) Conflict with Transportation Plans, Ordinances, and Policies.

The project is expected to generate traffic from employees and delivery vehicles entering and leaving the project site. This traffic is expected to primarily use Morgan Hill Road, mainly from the Hayfork community to the project site driveway. As noted, the County General Plan states that the minimum acceptable LOS on County roadways is D. The RTP acknowledges this standard and indicates that County two-lane roadways would maintain LOS D up to a traffic volume of 7,000 (Trinity County 2017).

As discussed in Section 3.13, Population and Housing, the project is expected to generate some employment, estimated for this analysis at a potential maximum of 40. If a round trip is assumed for each employee, plus an extra half trip for trips associated with other business trips such as pickup of product and delivery of fuel and materials, then the project would generate a maximum of 100 daily vehicle trips. A CEQA document for a similar project estimated traffic based on a trip generation rate applicable to industrial activities as applied to a proposed distribution facility, with cultivation and nursery traffic assumed to be included as part of the trip generation rate. The trips generated were considerably less than are assumed for this project (Trinity County 2018b), so the actual trips generated by the proposed project may be less.

Morgan Hill Road can accommodate the additional daily vehicle trips estimated for the project without its LOS degrading to a level below D, as the total traffic volume with the project is not expected to exceed 7,000. Given the limited traffic that would be generated, the project would not affect the objectives and plans of the 2018 RTP. Employee traffic would generally be limited to starts and ends of shifts, while pickup and delivery traffic would be occasional. Project traffic would not obstruct or cause congestion such that it would interfere with the predominantly residential traffic on the segment of Morgan Hill Road adjacent to the project site. Project impacts related to transportation, plans, ordinances, and policies would be less than significant.

The project would not affect Trinity Transit bus routes or stops, since no buses travel on Morgan Hill Road. There are no bicycle routes or sidewalks along Morgan Hill Road. The project would have no impact related to non-vehicular transportation, including plans relevant to such transportation facilities.

b) Conflict with CEQA Guidelines Section 15064.3(b).

Recently, Section 15064.3 was added to the CEQA Guidelines. Section 15064.3 states that “vehicle miles traveled” (VMT) is the preferred method for evaluating transportation

impacts, rather than the commonly used LOS. The VMT metric measures the total miles traveled by vehicles as a result of a given project. VMT accounts for the total environmental impact of transportation associated with a project, including use of non-vehicle travel modes. Section 15064.3(b) sets forth the criteria for analyzing transportation impacts using the preferred VMT metric. Land use projects generally should be presumed to cause a less-than-significant transportation impact if they are within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor. Also, projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less-than-significant transportation impact.

The project site is not within one-half mile of an existing major transit stop or a stop along an existing high-quality transit corridor. The project is not expected to decrease VMT in the project area; in fact, it would add VMT. However, according to a Technical Advisory released by the Governor's Office of Planning and Research, the land use projects of interest in VMT analysis are residential, office, and retail (OPR 2018). Manufacturing and agricultural projects are not mentioned. Also, new and seasonal employees are presumed to be from the local Hayfork population and would not cause significant additional traffic in the area. Based on this, the project impacts related to VMT are considered less than significant.

c) Traffic Hazards.

The project would not alter Morgan Hill Road, the main road serving the project site. As noted above, traffic would increase minimally with implementation of the project, so it would not introduce any hazards related to increased traffic. All parking would occur on site, so no vehicles would be parked on Morgan Hill Road, potentially obstructing traffic. Project impacts on traffic hazards would be less than significant.

d) Emergency Access.

The project would not change existing emergency access to the project site, which would be by an existing gravel driveway. As noted in Section 3.8, Hazards and Hazardous Materials, the project would follow provisions of the Fire Safe Ordinance that pertain to access for emergency vehicles. The project would have no impact on emergency access.

3.18 TRIBAL CULTURAL RESOURCES

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

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or

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

	√		
	√		

NARRATIVE DISCUSSION

Environmental Setting

In 2015, the California Legislature enacted AB 52, which focuses on consultation with Native American tribes on land use issues potentially affecting the tribes. The intent of this consultation is to avoid or mitigate potential impacts on “tribal cultural resources,” which are defined as “sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe.” More specifically, Public Resources Code Section 21074 defines tribal cultural resources as:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are included or determined to be eligible for inclusion in the California Register of Historical Resources, or included in a local register of historical resources; or
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1 [i.e., eligible for inclusion in the California Register of Historical Resources].

Under AB 52, when a tribe requests consultation with a CEQA lead agency on projects within its traditionally and culturally affiliated geographical area, the lead agency must provide the tribe with notice of a proposed project within 14 days of a project application being deemed complete or when the lead agency decides to undertake the project if it is the agency’s own project. The tribe has up to 30 days to respond to the notice and request

consultation; if consultation is requested, then the local agency has up to 30 days to initiate consultation.

Ethnographically, as noted in Section 3.5, Cultural Resources, the project site is on lands that were traditionally occupied by the Wintu. Traditional territories of the Nongatl were located west, with Lassik and Nomlaki to the south, and Chimariko to the north (Natural Investigations Company 2018). Tribes and tribal organizations contacted on past projects in Trinity County have included the Wintu Tribe, Wintu Educational and Cultural Council, the Redding Rancheria, and the Nor-Rel-Muk Nation.

Environmental Impacts and Mitigation Measures

a-i, ii) Tribal Cultural Resources.

In accordance with AB 52, the County initiated consultation with local tribes on the project. The County did not receive comments or any requests for consultation within the required 30-day period, and to date has not received comments from culturally affiliated tribes or their representatives. Because no comments were received, it is assumed that the project would not affect tribal cultural resources. This confirms the previous cultural resource impact assessment of the project site (Natural Investigations Company 2018).

While not expected, it is possible that buried archaeological resources may be found that could be recognized as tribal cultural resources. As discussed in Section 3.5, Cultural Resources, implementation of Mitigation Measure CULT-1, along with compliance with CEQA Guidelines Section 15064.5(e) regarding human remains, would ensure proper disposition of uncovered cultural resources, including tribal resources. Implementation of these measures would reduce potential impacts on uncovered tribal cultural resources to a level that would be less than significant.

Level of Significance: Potentially significant

Mitigation Measures: Implementation of Mitigation Measures CULT-1.

Significance After Mitigation: Less than significant

3.19 UTILITIES AND SERVICE SYSTEMS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment facilities or storm drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			√	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?			√	
c) Result in a determination by the wastewater treatment provider which serves or may serve the project determined that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				√
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			√	
e) Comply with federal, state and local management and reduction statutes and regulations related to solid waste?			√	

NARRATIVE DISCUSSION

Environmental Setting

The project site currently uses an on-site septic system for wastewater disposal at an existing building that is not part of the existing cultivation operation. It also uses an on-site groundwater well for water. There are no stormwater facilities on the project site, other than an existing pond that collects rainwater.

Trinity County provides solid waste collection service to specific areas. The County operates a transfer station south of Hayfork for the collection of household and commercial waste, along with wood wastes, metal goods, and tires among other items. It also has a single-stream recycling facility. Cannabis waste generated by existing cultivation activity is composted on site.

As noted in Section 3.6, Energy, existing electrical lines maintained by Trinity PUD are available to the project site. There is no natural gas service provided to the project site. Telecommunication service is available to the project site.

Environmental Impacts and Mitigation Measures

a) Construction or Relocation of Infrastructure.

The two approved wastewater disposal systems would be placed on site in an already-developed area. The project would not connect to any existing wastewater collection system in the area. As indicated on a map available in Appendix E, the project site is not within the service area of Trinity County Water Works District #1.

The project would use an on-site well, so no substantial water infrastructure would be constructed. The project would not connect to any existing water distribution system in the area, including Trinity County Water Works District #1.

As noted in Section 3.10, Hydrology and Water Quality, the project site contains an existing pond that could accommodate additional runoff generated by additional impervious surface. The project does not require additional stormwater facilities, the construction of which could cause environmental impacts.

The project would connect to existing electrical lines in the area. No addition electrical lines need to be installed to serve the project site. The project would not use natural gas, so no gas lines would need to be installed. The project would rely on existing telecommunication facilities. Project impacts related to infrastructure would be less than significant.

b) Water Supply.

The project would use an on-site well. As discussed in Section 3.10, Hydrology and Water Quality, the project is not expected to have an adverse impact on groundwater supplies, as the well would provide adequate supply. The project would not connect to any existing water distribution system in the area. Project impacts related to water supply would be less than significant.

c) Wastewater Systems.

Potential impacts related to the proposed septic systems are discussed in Section 3.7, Geology and Soils. The project septic systems, permit applications for which have been approved by the County, would be required to comply with the provisions of North Coast RWQCB Order No. 2015-0023 and with County requirements regarding wastewater disposal. The County manufacturing ordinance requires that wastewater from Type 7 license facilities shall be disposed of into an adequate system, as prescribed by the County Environmental Health Division and pursuant to State regulation. The expanded cultivation would use an irrigation system that would generate minimal wastewater. The project would not be connected to any wastewater system, so the project would have no impact.

d, e) Solid Waste Services.

Cannabis manufacturing operations may generate solid waste from various materials and containers used, as well as household trash from workers and discarded equipment.

Additionally, cannabis manufacturing would typically generate green waste from trimming of unwanted leaves and plant parts. Plant residues will be ground up and composted on site. Other solid waste would be disposed of in covered containers and hauled by staff to a licensed landfill or transfer station.

Both CDFA and CDPH regulations require that the cultivator develop a cannabis waste disposal plan, which would require that the waste is disposed of at either a solid waste facility that has a permit to operate from the California Department of Resources Recycling and Recovery (CalRecycle), a composting materials handling facility that has a permit to operate from CalRecycle, or a designated composting area.

As noted, the project site has a composting area, and as described in Chapter 2.0, the project proposes to add a composting reactor that would be used for the disposal of compostable materials from project operations. The composting reactor is capable of processing up to 150 pounds of waste per day. As indicated in Chapter 2.0, the total amount of material to be processed would be 1,000-2,000 pounds per week. Assuming the maximum amount and that 50 percent of the material would be waste (1,000 pounds per week of waste), the reactor would be capable of processing the waste generated by the proposed manufacturing operation. The project applicant has indicated that the composting facility can be readily expanded to match the waste demand if necessary. Project impacts related to solid waste would be less than significant.

3.20 WILDFIRE

If located in or near state responsibility areas or lands classified as Very High Fire Hazard Severity Zones, would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?				√
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?			√	
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?			√	
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?			√	

NARRATIVE DISCUSSION

Environmental Setting

As discussed in Section 3.9, Hazards and Hazardous Materials, the threat of catastrophic fire is probably the most significant hazard in the Hayfork area. There were 105 wildfires in Trinity County between 1999 and 2009, with approximately 433,835 acres burned. The regional and landscape impacts of these fires include changes in vegetation patterns, loss of remaining old-growth forests in reserves, adverse impacts to air quality and its associated effects on public health, economic losses, and dangers to human life (Trinity County 2014).

Hot, dry summers reduce fuel moisture and increase the potential for fires. Wind affects fire behavior and the dispersal of smoke produced by fires. Along with the major seasonal Pacific westerlies, there are also two types of diurnal winds that occur in mountainous areas like Trinity County: land-to-sea breezes and mountain-to-valley winds (Trinity County 2014).

The California Department of Forestry and Fire Protection's Fire and Resource Assessment Program identifies fire threat based on a combination of two factors: 1) fire frequency, or the likelihood of a given area burning, and 2) potential fire behavior (hazard). These two factors are combined in determining the following Fire Hazard Severity Zones: Moderate, High, Very High, Extreme. The project site has been placed in a Very High Fire Hazard Severity Zone (Cal Fire 2007).

Environmental Impacts and Mitigation Measures

a) Emergency Response and Emergency Evacuation Plans.

As discussed in Section 3.9, the project proposes no changes to Morgan Hill Road, which would be the main road for emergency vehicle access and for evacuations. No obstructions or other alterations that could hinder access would be installed. The project would have no impact on emergency response and evacuations.

b) Exposure of Project Occupants to Pollutants.

As noted, the project has been designated by CalFire as being within a Very High Fire Hazard Severity Zone. It is possible that project employees could be exposed to pollutants generated by wildfires in the area. However, project employees would not be constantly exposed to these pollutants and can be evacuated from the site if necessary. The project by itself is not expected to exacerbate existing wildfire risks in the area, as it would not include any features that could exacerbate the probability of wildfire. Project impacts would be less than significant.

c) Installation and Maintenance of Infrastructure.

As discussed in b) above, the project by itself is not expected to exacerbate existing wildfire risks in the area, as it would not include any features that could exacerbate the probability of wildfire. The project proposes an expanded cannabis cultivation area, plus

it would remove a few trees to install the manufacturing facility. Both these project features are expected to minimally reduce wildfire risk on the project site. As noted in Section 3.15, Public Services, the Hayfork Volunteer Fire Department reviewed the project and found that it had adequate fire suppression features. Project impacts would be less than significant.

d) Risks from Runoff, Post-Fire Slope Instability, or Drainage Changes.

The project site is in an area that contains some steep, forested slopes. It is conceivable that some of these slopes may catch fire, afterwards leaving exposed slopes to rain that could cause landslides and flooding. As noted in Section 4.4, Biological Resources, the project site lies at the toe of a mountain slope on a river terrace, with topography ranging from moderately steep north-facing slopes to flat floodplains.

The project would not exacerbate existing risks associated with potential post-fire occurrences. As noted in b) above, employees can be evacuated if necessary. Also, as discussed above, the project has a fire suppression plan that would reduce potential risks. Project impacts related to these issues are considered less than significant.

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		√		
b) Does the project have impacts that are individually limited, but cumulatively considerable? "Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?			√	
c) Does the project have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly?				√

NARRATIVE DISCUSSION

a) Findings on Biological and Cultural Resources.

The project's potential biological resource and cultural resource impacts were described in Sections 3.4 and 3.5, respectively. Potentially significant environmental effects on biological and cultural resources were identified, but implementation of mitigation measures that would be incorporated within the project would reduce these effects to a level that would be less than significant. The mitigation measures are described in Sections 3.4 and 3.5 and are listed in Table 1-1.

b) Findings on Cumulatively Considerable Impacts.

According to CEQA Guidelines Section 15130(a)(1), a cumulative impact is created by the combination of a proposed project with other past, present, and probable future projects (or programs) causing related impacts. Cumulative impacts can result from individually minor, but collectively significant, projects taking place over a period of time (CEQA Guidelines Section 15355[b]). Proposed project activities involving cannabis cultivation, manufacturing, and nurseries may have impacts that are cumulatively considerable when considering cannabis activities, both legal and illegal, at the state and County levels.

The cumulative setting in the CFDA CalCannabis Cultivation Licensing PEIR considered several categories of activities outside the scope of the program that may combine with the effects of the program to create significant cumulative impacts, as follows (CDFA 2017):

- Development of sites for licensed cultivation activities. Site development activities may include, but are not limited to, developing a new cultivation site for the purpose of operating that site under the CDFA program; upgrading or otherwise modifying an existing cultivation site to bring that site into compliance with all applicable local, State, and federal regulations, permitting programs, and requirements; and/or modifying an existing site's design or facilities to support the cultivator's planned activities.
- Illegal, unpermitted, and/or unlicensed commercial cultivation and related activities. The PEIR anticipated that the number of unlicensed cultivators in the state supplying cannabis to the illegal export market would remain unchanged, but that many of the unlicensed cultivators producing cannabis for in-state consumption would become licensed.
- Non-commercial cannabis cultivation activities (i.e., for personal use). Under MAUCRSA, qualified patients and caregivers can cultivate up to 6 mature or 12 immature plants without a license. Adults over 21 may also cultivate 6 plants without a license.
- Commercial cannabis activities licensed by other State agencies (e.g., manufacturing, retailers).

- Cannabis consumption.
- Other activities, not related to cannabis, that may result in similar impacts. These include population growth, urbanization, land development, and commerce.

As described in Chapter 1.0, Introduction, Trinity County has issued approximately 425 cultivation licenses. Currently, there are approximately 250 active licensed sites and another 100 in the licensing process. It is estimated that more than 3,500 unpermitted cultivation operations exist on private land in the County, and 10-20 illegal trespass grows on public lands. There are no licensed manufacturing facilities and few licensed nurseries.

The CalCannabis PEIR stated that the cultivation licensing program has the potential to contribute to cumulative impacts related to the following resource topics: aesthetics; agriculture and forestry resources; air quality; biological resources; hazards, hazardous materials, and human health; hydrology and water quality; noise; public services; transportation and traffic; and utilities and service systems. Impacts relating to greenhouse gas (GHG) emissions are intrinsically a cumulative issue and were addressed in the program analysis. All other resource topics were dismissed from consideration in the analysis of cumulative impacts for one of the following reasons: significant cumulative impacts do not exist, the program would not have the potential to make a considerable contribution to any significant cumulative impacts, or insufficient information exists to reach a conclusion regarding these topics without significant speculation. For the proposed project, the listed issues above are considered in the cumulative impact analysis for the project. Cultural resources, geology and soils, land use, mineral resources, population and housing, recreation, and tribal cultural resources are not analyzed for the same reasons they were not analyzed in the CalCannabis PEIR. GHG emissions related to the project are intrinsically cumulative; as such, the project analysis in Section 3.7 of this IS/MND adequately describes cumulative impacts.

On a cumulative basis, the County cannabis ordinances, the requirements with which the project must comply, are expected bring a substantial number of existing cannabis cultivation operations into compliance with a wide variety of resource protection laws and regulations and/or relocate cannabis cultivation operations to environmentally superior locations (i.e., setback from riparian areas, avoiding steep slopes, etc.). While individual cannabis operations licensed by the County may have non-negligible impacts on the environment, the overall impact of the ordinances is expected to reduce rather than increase the environmental footprint of the cannabis industry in Trinity County.

The potential for the project to have cumulatively considerable impacts on each environmental topic are as follows:

Aesthetics. The CalCannabis PEIR notes that site development has the potential to have substantial temporary and/or permanent effects on existing scenic vistas, scenic resources, designated State scenic highways, and/or the existing visual character or quality of a particular site and its surroundings. Additionally, construction of new facilities and modifications to existing facilities could involve use of additional lighting that could create impacts on adjacent and nearby properties, residences, and/or motorists

traveling on nearby roadways (CDFA 2017). As described in Section 3.1, Aesthetics, the project is expected to have no significant impacts on scenic vistas, scenic resources, or visual landscapes, and potential lighting impacts would be mitigated. The project would not make a cumulative considerable contribution to aesthetic impacts.

Agriculture and Forestry Resources. According to the CalCannabis PEIR, while cannabis cultivation itself is an agricultural activity, site development for cultivation may involve the conversion of areas of farmland to nonagricultural uses, such as for ancillary structures not directly related to cultivation. Other forms of cannabis commerce, such as manufacturing, may require site development that converts farmland to nonagricultural uses (CDFA 2017). However, as discussed in Section 3.2, Agriculture and Forestry Resources, the project would not limit potential future agricultural uses of the site, even with the proposed zoning change. The project site has an existing licensed cannabis cultivation facility, which is considered an agricultural activity by the State, and proposes to expand cultivation activities, along with adding a manufacturing facility and nursery that would complement these activities. As such, the project would not make a cumulatively considerable contribution to agriculture impacts.

Air Quality. As described in Section 3.3, Air Quality, the project site is within the North Coast Air Basin, which is in attainment status for all criteria pollutants except for particulate matter in Humboldt County. Project emissions associated with the project would not change the existing attainment status for criteria pollutants. The project would not make a cumulatively considerable contribution to air quality impacts.

Biological Resources. Cannabis activities in the County, particularly legal and illegal cultivation, has affected biological resources and vegetation communities. As noted in Section 3.4, Biological Resources, the project would not be built within 300 feet of Hayfork Creek, so the project would not contribute to surface water impacts in the Hayfork Creek watershed. A limited number of trees would be removed; however, most of the project site would remain forested and open for wildlife migration. Project development would be limited to an already-developed area. The project would not make a cumulatively considerable contribution to biological resource impacts.

Hazards and Hazardous Materials. Common practices at unlicensed cannabis cultivation sites involve the use or generation of hazardous pollutants that may enter streams, other surface waters, and groundwater, and create a risk of exposure to these materials for people and wildlife (CFDA 2017). While the project would use hazardous materials, as described in Section 3.9, the use would comply with State licensing provisions and County ordinances as they relate to the use of hazardous materials in cultivation, manufacturing, and nursery operations, thereby limiting hazardous material releases to the local environment. The project would not make a cumulatively considerable contribution to hazards and hazardous material impacts.

Hydrology and Water Quality. Construction of unpermitted river and lake diversions for the irrigation of cannabis crops of unlicensed operations have reportedly resulted in reduced water flows and the dewatering of streams and rivers, contamination of watersheds, and alteration of watersheds and natural water courses (CDFA 2017). The County ordinances, as well as the existing North Coast RWQCB Order No. 2015-0023

and the recently adopted SWRCB Order WQ 2017-0023-DWQ, increase environmental protections and require a reduction in sediment and runoff from existing and future cannabis sites as compared to industry practices in the absence of regulation. Requirements to demonstrate adequate water supply, comply with a variety of state and local conservation regulations, setbacks from streams and sensitive uses, minimum parcel sizes, maximum cultivation sites, energy efficient requirements, and other restrictions will guide the cannabis industry over time to locate in less-sensitive areas and to operate in a manner which will have fewer environmental impacts. The project would not make a cumulatively considerable contribution to hydrology and water quality impacts.

Noise. The CalCannabis PEIR states that exposure to noise is a localized issue; cumulative impacts would be possible in instances where a receptor or group of receptors could be exposed to excessive noise from multiple sources (CDFA 2017). Project noise would be limited mainly to construction, which would cease when work is completed. As discussed in Section 3.13, Noise, the project would be subject to County noise standards. The project would not make a cumulatively considerable contribution to noise impacts.

Public Services. Unlicensed cultivation activities currently place substantial demands on law enforcement and, in some instances, fire protection services. In addition, site development and operation of new, expanded or otherwise modified facilities for licensed commercial cannabis businesses (cultivation and otherwise) have the potential to generate calls for service from fire and law enforcement (CDFA 2017). As described in Section 3.15, Public Services, the project proposes security measures to deter criminal activities. The CalCannabis PEIR concluded that demand for law enforcement services may decrease due to a larger number of lawful cultivators and their coordination and cooperation with law enforcement authorities (CDFA 2017). Also, as described in Section 3.15, the project would be required to comply with County ordinances containing provisions that would reduce potential demand for fire services. The project would not make a cumulatively considerable contribution to public service impacts.

Transportation. Development and operation of cannabis-related businesses, both licensed and unlicensed, could contribute to localized impacts on transportation and traffic, depending on the specific location, the amount of traffic generated by workers and/or customers, and other traffic-related effects such as temporary lane closures and material/equipment deliveries during construction activities (CDFA 2017). As described in Section 3.16, Transportation/Traffic, the project is not expected to degrade LOS on local roads to a level below County standards. The project would not make a cumulatively considerable contribution to transportation impacts.

Utilities and Service Systems. Construction and site development activities for new or expanded cannabis cultivation facilities could require additional water supplies as well as wastewater service. Ongoing unpermitted cannabis cultivation activities may divert water from streams without authorization, thereby adversely affecting utilities or water right holders who may obtain water from that source. Unlicensed indoor cultivation also often involves stealing electricity from utilities by tapping electrical lines and bypassing the electrical meter (CDFA 2017). The project would utilize an existing groundwater well and existing electricity connections for its operations, and it would install approved septic

systems for its proposed manufacturing and cultivation operations. The project would not make a cumulatively considerable contribution to utility impacts.

In summary, the project would be required to comply with several County ordinances designed to reduce the environmental impacts of cannabis operations. In addition, the project would be required to implement mitigation measures that would reduce the project's individual contribution to environmental effects. The project would have a cumulatively considerable effect on the environment that is less than significant.

c) Findings on Adverse Effects on Human Beings.

Potential adverse effects on human beings were discussed in Section 3.3, Air Quality (TACs); Section 3.7, Geology and Soils (seismic hazards); Section 3.9, Hazards and Hazardous Materials; Section 3.10, Hydrology and Water Quality (flooding); Section 3.17, Transportation/Traffic (traffic hazards); and Section 3.20, Wildfire. No significant adverse effects were identified in these sections. The project would have no potential adverse effects on human beings.

4.0 REFERENCES

4.1 DOCUMENT PREPARERS

This IS/MND was prepared by BaseCamp Environmental, Inc. for use by Trinity County. The following persons were involved in preparation of the IS/MND:

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4.3 PERSONS CONSULTED

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5.0 NOTES ON EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant with Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration [CEQA Guidelines Section 15063(c)(3)(D)]. In this case, a brief discussion should identify the following:
 - a) Earlier Analyses Used: Identify and state where they are available for review.
 - b) Impacts Adequately Addressed: Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

- c) Mitigation Measures: For effects that are “Less than Significant with Mitigation Incorporated,” describe the mitigation measures, which were incorporated or refined from the earlier document, and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) The checklist in CEQA Guidelines Appendix G is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a) the significance criteria or threshold, if any, used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significance.

APPENDIX A
NATURAL INVESTIGATIONS COMPANY
PEIR TIERING CHECKLIST



CDEA CALCANNABIS CULTIVATION LICENSING

PEIR TIERING CHECKLIST

**FOR THE CANNABIS CULTIVATION OPERATION AT
3001 MORGAN HILL ROAD, HAYFORK, CA**

JANUARY 17, 2018

APPLICANT:

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INTRODUCTION

As directed by the Medicinal and Adult Use Cannabis Regulation and Safety Act and the Adult Use of Marijuana Act, the California Department of Food and Agriculture (CDFA) has written proposed regulations to establish cannabis cultivation licensing and a track-and-trace system, collectively referred to as CalCannabis Cultivation Licensing. Section 8102: Application Requirements (b)(11) of CalCannabis Cultivation Licensing requires the following:

“Evidence that the local permit, license or other authorization to cultivate cannabis was issued in conformance with Division 13 of the Public Resources Code; California Environmental Quality Act (CEQA), including a copy of the Notice of Determination or Notice of Exemption, and either a copy of the CEQA document or reference to where it can be located electronically. If the local jurisdiction did not prepare a CEQA document, the applicant will be responsible for providing an environmental document in compliance with CEQA that can be certified by the Department in its role as lead agency.”

Because the local jurisdiction did not prepare a CEQA document for this cultivation operation (Scenario 3), a tiering checklist will be used as follows:

“In the scenario in which a local agency issues an approval for a cannabis cultivation project but no CEQA document is prepared, it may be because the local agency has found that the project is subject to a categorical exemption or the project is covered by the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment. CDFA may reject a lead agency’s exemption determination, but there should be a reasonable basis for doing so and for determining that the project does not fit within the exemption. CDFA may require the applicant to complete the Tiering Checklist to assist CDFA’s review. The Tiering Checklist should be used to document the extent to which the PEIR addresses the impacts of the applicant’s project. CDFA should assess the Tiering Checklist to determine whether all project impacts are adequately addressed. If CDFA determines that project impacts are not adequately addressed, CDFA may require the applicant to prepare the appropriate environmental document, but CDFA will subject the environmental document to CDFA’s own review and analysis.”

(Page J-4, Appendix J, Volume 2: Appendices. Final Program Environmental Impact Report. CalCannabis Cultivation Licensing, California Department of Food and Agriculture)

This Checklist is tiered off of the Program Environmental Impact Report (PEIR) prepared for the CalCannabis Cultivation Licensing program:

- California Department of Food and Agriculture. 2017. CalCannabis Cultivation Licensing Program Draft Program Environmental Impact Report. State Clearinghouse #2016082077. Prepared by Horizon Water and Environment, LLC, Oakland, California. 484 pp.

CDFA’s PEIR is incorporated by reference.

PROJECT DESCRIPTION

The Proposed Project is an existing Cannabis cultivation operation that is applying for licensing under the CalCannabis Cultivation Program. This cultivation operation is licensed by the County as "Type 2E small mixed light." It is located on a 40-acre parcel "Parcel" (APN 017-430-49) at 3001 Morgan Hill Road, in Hayfork, California. The Project Area is the sum of all the areas used for cultivation, including gardens, soil staging and material storage areas, ancillary buildings, irrigation system, and access roads. For this cultivation operation, the Project Area is situated near the center of the parcel in multiple subareas that together total approximately 3.5 acres in size. Cannabis is cultivated exclusively in secured greenhouses (see exhibits). The greenhouses consist of the following: five existing greenhouses, each 1,152 sq. ft. in size; and one duplex greenhouse (gutter-connect style) under construction, 8,600 sq. ft. in size. Two Conex boxes, located on both sides of the garage, are used for product drying. The garage (24 feet by 40 feet) and a shed will be used for nutrient and material storage. Cannabis plant residues will be chipped / grinded and composted in the vermicomposting facility near the eastern property line (see exhibits).

The cultivation operation will draw water from the residential water supply, which uses an existing, permitted groundwater well and electric pump. Plants are watered utilizing an automated drip irrigation system. Total water consumption from this well is about 2,000 gallons per week, of which 300 gallons is for domestic use and 1,700 gallons per week is used for cannabis irrigation. Security/concealment perimeter fencing consists of a 6-foot tall wood fence that has been installed along Morgan Hill road and along the west side of the greenhouses at the entrance to the parcel. Additional fencing will need to be constructed around the two gutter-connected greenhouses that were under construction in December 2017.

Prior to the establishment of this cultivation operation, land use was rural residential. The Project Area lies at the toe of a mountain slope in a river terrace, with topography ranging from moderately steep north-facing slopes to flat floodplains. There are no watercourses or wetlands in the Project Area. On the parcel, Hayfork Creek, a Class I Watercourse, flows along the north and west edges of the parcel. One other aquatic feature exists on the Parcel: a man-made pond that fills with rainwater. Wetlands are generally lacking on the parcel, but there are historical gravel dredging depressions that collect water occasionally.

The CalCannabis Licensing Program regulations do not address the construction, modification, or replacement of new and/or existing permanent structures or facilities associated with cannabis cultivation sites. Those issues are addressed through land use regulations and environmental review at a local level, and are analyzed in the Cumulative Impacts section of this checklist.

AESTHETICS

AESTHETICS	Consistent with the PEIR, Less Than Significant	Inconsistent with the PEIR, Not Potentially Significant	Inconsistent with the PEIR, Potentially Significant	No Similar Impact
<i>Would the proposed activity result in impacts that differ from the following impacts identified and discussed in the CalCannabis Cultivation Licensing PEIR (see PEIR Chapter 4.1)?</i>				
Impact AES-1: Result in a substantial adverse effect on a scenic vista, scenic resource, or State-designated scenic highway, and/or the existing visual character or quality of a site and its surroundings. (See PEIR pages 4.1-16 to 4.1-18)	X			
Impact AES-2: Create a new source of substantial light or glare as a result of outdoor security lighting. (See PEIR page 4.1-18)	X			
Impact AES-3: Create a new source of substantial light or glare as a result of indoor cultivation techniques. (See PEIR pages 4.1-18 to 4.1-19.)				X
Impact AES-4: Create a new source of substantial light or glare as a result of mixed-light cultivation. (See PEIR page 4.1-19.)	X			
<i>Would the proposed activity have other impacts not addressed above (refer to the checklist questions contained in Appendix G of the CEQA Guidelines)?</i>				
Impact:	X			

Consistency Analysis and Impact Analysis

Impact AES-1

The PEIR concluded that while cultivation equipment may be visible from portions of roadways, cultivation operations were not always distinguishable from noncannabis agricultural operations, and did not appear out of place within the existing landscape mosaic. In general, visual effects associated with existing cultivation activities did not result in substantial impacts on the visual character or quality of an area.

The PEIR also concluded that local land use requirements—even if they are not specific to cannabis cultivation—should ensure land use compatibility and, by extension, would address potential impacts on existing visual character and visual quality at a local level. CDFA also expects that local discretionary permitting processes for cannabis cultivation (to the extent that the local jurisdiction has established such a process) or for other aspects of site development, and related CEQA evaluations, would address, as appropriate, protection of locally and regionally important views and viewsheds from potential site-specific impacts on scenic highways, corridors, scenic vistas, and natural features.

The project site is located within a rural residential and agricultural area in the Klamath Ranges, east of the town of Hayfork. Where views are unobstructed by steep terrain or vegetation, views of canyons and mountain tops, may be seen. The existing features of the parcel consist of a single-family residence near the center of the parcel, a garage, shed and two conex containers north of the residence, a geodesic dome on the northern portion of the parcel, and seven greenhouses near the center of the parcel. The parcel is near the end of a paved road (Morgan Hill Road), and is surrounded by rural residences and U.S. Forest Service land. Cannabis cultivation occurs on the numerous properties in the area, including the two properties to the east. Properties to the north and west of Hayfork Creek include a former lumber mill and a gravel mine. No officially designated State Scenic Highways are located in Trinity County. The nearest Scenic Highway is State Route 151 near Shasta Lake, which is 40 miles east of the Project Area. The nearest Wild and Scenic River is the Trinity River, 10 miles northeast of the Project Area. The Proposed Project conforms with Trinity County's current regulations for the cultivation of medical/recreational

cannabis, which require that under a Type 2B license, cannabis not be cultivated or otherwise placed within 30 feet of any property line or within 350 feet of any off-site residence, within 1000-feet from a youth-oriented facility, 500 feet from a school bus stop and out of view from any public right of way.

The proposed cultivation operation does not involve the erection of buildings that would obscure views, and there are no specific scenic vistas in the vicinity. The proposed land use is agriculture, which is consistent with surrounding land uses. Artificial lighting is employed to supplement natural lighting as needed. The project does not propose any new development, construction or physical change to the environment that would directly or indirectly result in any impacts to aesthetic resources. The cannabis garden will not be visible from public roads, as the cultivator will erect a 6 to 8-foot tall security and concealment fence that will obscure the view of the garden. Morgan Hill Road is 50-feet from the nearest greenhouse. The siding on the greenhouses is translucent, and the crop growing within cannot be identified visually. The Proposed Project is consistent with the baseline conditions of the PEIR and will have a less than significant impact upon the visual character of the region.

Impact AES-2 and AES-4

The CalCannabis Licensing Program regulations include implementation of environmental protection measures (Sections 8313 and 8314; proposed regulations are provided in Appendix A) requiring that all outdoor lighting be downward facing and shielded to minimize the visual effects of the presence of lighting, and that lighting for mixed-light operations is shielded between sunset and sunrise to minimize nighttime glare. With these measures in place, visual impacts from the CalCannabis Licensing Program would be less than significant. The Proposed Project will comply with the CalCannabis Licensing Program environmental protection measures regarding lighting.

Mitigation

None required.

AGRICULTURE AND FORESTRY RESOURCES

AGRICULTURE AND FORESTRY RESOURCES	Consistent with the PEIR, Less Than Significant	Inconsistent with the PEIR, Not Potentially Significant	Inconsistent with the PEIR, Potentially Significant	No Similar Impact
<i>Would the proposed activity result in impacts that differ from the following impacts identified and discussed in the CalCannabis Cultivation Licensing PEIR (see PEIR Chapter 4.2)?</i>				
Impact AG-1: Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to nonagricultural use.	No significant impacts possible			
Impact AG-2: Convert farmland to cannabis cultivation from other crops.	No significant impacts possible			
Impact AG-3: Potential conflict with existing zoning for agricultural use or Williamson Act contract. (See PEIR page 4.2-23.)	X			
Impact AG-4: Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned for timberland production. (See PEIR page 4.4-24.)	X			
Impact AG-5: Cause loss of forestland or conversion of forestland to nonforest uses. (See PEIR page 4.2-24.)	X			
Impact AG-6: Involve other changes in the existing environment that, because of their location or nature, could result in conversion of farmland to nonagricultural use or conversion of forest land to nonforest use. (See PEIR pages 4.2-24 to 4.2-25.)	X			
<i>Would the proposed activity have other impacts not addressed above (refer to the checklist questions contained in Appendix G of the CEQA Guidelines)?</i>				
Impact:				

Consistency Analysis and Impact Analysis

Impact AG-3

Generally, cannabis cultivation would either be allowed within land under a Williamson Act contract, or would not be allowed in locations where it has been determined that cannabis cultivation is not permitted under a Williamson Act contract. All cultivators would be required to follow applicable local guidance in order to remain licensed by CDFA. For these reasons, potential conflicts with existing zoning for agricultural use or Williamson Act contracts would be less than significant.

The Proposed Project is Cannabis cultivation, which the State of California defines as an agricultural product. The parcel is zoned for agriculture (A10 – Agriculture 10-acre minimum) and is not enrolled in a Williamson Act contract. The proposed use is agriculture; the State of California defines cannabis as an agricultural product. The subject property is not identified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, but is designated as “Other Land”, on the maps prepared, pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. The Proposed Project is consistent with the parcel’s zoning, which includes a designation for agriculture. Proposed Project implementation will not result in any adverse impacts to lands zoned for agricultural or to Williamson Act contracts.

Impacts AG-4, AG-5, and Impact AG-6

Under the CalCannabis Licensing Program, applicants would be required to comply with local requirements including zoning districts designated for forest land and timberland. While site development is outside of the scope of the CalCannabis Licensing Program, applicants and owners of nonfederal timberland would be required to apply for either a Timberland Conversion Permit from CAL FIRE for the conversion of timberland greater than 3 acres to develop a site for cannabis cultivation uses, or an

exemption for the conversion of timberland less than 3 acres. The parcel has some commercial timber resources. No tree removal is necessary for implementation of the Proposed Project. The Proposed Project is consistent with the baseline conditions of the PEIR and will have a less than significant impact upon forestry resources.

Mitigation

None required.

AIR QUALITY

AIR QUALITY	Consistent with the PEIR, Less Than Significant	Inconsistent with the PEIR, Not Potentially Significant	Inconsistent with the PEIR, Potentially Significant	No Similar Impact
<i>Would the proposed activity result in impacts that differ from the following impacts identified and discussed in the CalCannabis Cultivation Licensing PEIR (see PEIR Chapter 4.3)?</i>				
Impact AQ-1: Conflict with or obstruct implementation of an applicable air quality plan, and/or violate any air quality standard or contribute substantially to an existing or projected air quality violation. (See PEIR pages 4.3-29 to 4.3-32.)	X			
Impact AQ-2: Expose sensitive receptors to substantial pollutant concentrations as a result of cannabis cultivation. (See PEIR pages 4.3-32 to 4.3-33.)	X			
Impact AQ-3: Create objectionable odors affecting a substantial number of people as a result of cannabis cultivation. (See PEIR page 4.3-33 to 4.3-34.)	X			
<i>Would the proposed activity have other impacts not addressed above (refer to the checklist questions contained in Appendix G of the CEQA Guidelines)?</i>				
Impact:				

Consistency Analysis and Impact Analysis

Impact AQ-1

Under both baseline conditions and the CalCannabis Licensing Program, cannabis cultivation may include the operation of gasoline- or diesel-fueled equipment (e.g., generators, irrigation pumps, loaders, ventilation fans, and potentially gasoline-fueled landscaping equipment) and truck or vehicle trips to and/or from the site by vendors and workers, which would result in direct criteria air pollutant emissions from fuel combustion.

The CalCannabis Licensing Program would implement environmental protection measures found in Sections 8313 and 8315 of the proposed regulations. Section 8313 would prohibit the use of gas- or diesel-powered generators except as a backup energy source in the event of a power outage or emergency

CDFA (2017) summarizes the impacts from small cannabis cultivation operations as follows:

“Despite the potential air quality emission-generating sources described above that are associated with cannabis cultivation activities, it is not anticipated that the Proposed Program would conflict with or obstruct implementation of air quality plans for the numerous reasons outlined below. First, the cannabis cultivation activities under the Proposed Program would not be anticipated to generate a substantial number of vehicle trips (see Section 4.12, Transportation and Traffic) that would affect air quality. In addition, outdoor and mixed-light cultivation activities would generally occur on such small acreages that these activities would often not require intensive use of heavy equipment.” (page 4.3-30)

Cultivation operations may generate fugitive dust emissions through ground-disturbing activities such as ground tilling, uncovered soil or compost piles, and vehicle or truck trips on unpaved roads. Fugitive dust will be controlled by wetting the soil with a mobile water tank and hose, or by delaying ground disturbing activities until site conditions are not windy. Because the Proposed Project will not generate any significant amounts of pollutants, it will not impact regional air quality. Implementation of the Proposed Project will not conflict with or obstruct implementation of the North Coast Unified Air Quality Management District’s Rules and Regulations, will not violate any air quality standard or contribute

substantially to an existing or projected air quality violation, and will not result in a cumulatively considerable net increase of any criteria pollutant.

Impact AQ-2

The nearest sensitive receptors are a daycare, residential subdivision and high school about 1 mile to the west of the Project Area. Implementation of the Proposed Project will not impact sensitive receptors because no sensitive receptors are close enough to be affected.

Impact AQ-3

In cases where the perception of the odor as objectionable is widespread in a community, CDFA anticipates that the community has developed or will develop odor control requirements which match their local community expectations and standards, including and up to banning cultivation altogether. Cultivators in these locations would be required to comply with applicable local cannabis cultivation-, nuisance- or odor-related policies and regulations. For these reasons, cultivation under the CalCannabis Licensing Program would not be anticipated to emit odors that would be considered objectionable by a substantial number of people, especially when considered on a statewide basis.

Cannabis cultivation can generate objectionable odors, primarily with indoor cultivation operations. In greenhouse cultivation, odors may be contained and filtered. No significant odor impacts that would affect a substantial number of people are anticipated from the Proposed Project because of the limited population in the area, sufficient setback from public roads, the containment of odors within greenhouse walls, and the existence of cannabis gardens on the adjoining parcels.

Mitigation

None required.

BIOLOGICAL RESOURCES

BIOLOGICAL RESOURCES	Consistent with the PEIR, Less Than Significant	Inconsistent with the PEIR, Not Potentially Significant	Inconsistent with the PEIR, Potentially Significant	No Similar Impact
<i>Would the proposed activity result in impacts that differ from the following impacts identified and discussed in the CalCannabis Cultivation Licensing PEIR (see PEIR Chapter 4.4)?</i>				
Impact BIO-1: Cause adverse effects on aquatic and semi-aquatic special-status species. (See PEIR pages 4.4-17 to 4.4-21.)	X			
Impact BIO-2: Cause substantial adverse effects on special-status plant species. (See PEIR pages 4.4-21 to 4.4-22.)	X			
Impact BIO-3: Cause substantial adverse effects on wildlife due to increased light, including special-status terrestrial wildlife species. (See PEIR page 4.4-22.)	X			
Impact BIO-4: Cause substantial adverse effects on special-status terrestrial wildlife species due to increased noise and human presence. (See PEIR pages 4.4-22 to 4.4-23.)	X			
Impact BIO-5: Cause substantial adverse effects on riparian habitat, other sensitive natural communities, or federally protected wetlands. (See PEIR page 4.4-23 to 4.4-24.)	X			
Impact BIO-6: Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or wildlife corridor, or impede the use of native wildlife nursery sites. (See PEIR pages 4.4-24 to 4.4-25.)	X			
Impact BIO-7: Conflict with applicable habitat conservation plans or natural community conservation plans. (See PEIR page 4.4-25.)	X			
Impact BIO-8: Conflict with local policies or ordinances protecting biological resources. (See PEIR page 4.4-25.)	X			
Impact BIO-9: Cause substantial adverse effects on wildlife due to pesticide use (besides rodenticides). (See PEIR pages 4.4-25 to 4.4-26.)	X			
Impact BIO-10: Cause substantial adverse effects on wildlife due to rodenticide use. (See PEIR pages 4.4-26 to 4.4-30.)	X			
Impact BIO-11: Cause substantial adverse impact on nesting birds as a result of outdoor cultivation. (See PEIR page 4.4-30.)	X			
<i>Would the proposed activity have other impacts not addressed above (refer to the checklist questions contained in Appendix G of the CEQA Guidelines)?</i>				
Impact:				

Consistency Analysis and Impact Analysis

Impact BIO-1

Because licensed cannabis cultivation operations could occur in habitats and locations throughout the State, there is potential for various special-status species to occur in proximity to cultivation operations. The PEIR concludes that most potential adverse effects on special-status species would occur during development of facilities used for cultivation, which are considered in the Cumulative Impacts section of this Checklist. Therefore, this mechanism for impacts on biological resources is not considered further here.

Cultivation activities could affect aquatic and semi-aquatic special-status species through surface water withdrawals, erosion/sedimentation, and release of hazardous materials to water bodies (e.g., fuels, pesticides) during ongoing operations. The primary concerns related to adverse effects on aquatic and semi-aquatic special-status species arise from unpermitted/illegal cultivation, because these operations have been documented to frequently be out of compliance with applicable regulatory requirements.

The Project Area is not within any listed species' designated critical habitat. No special-status animal or plant species were observed during the site survey by Natural Investigations Company. The California Department of Fish and Wildlife's rare species database (California Natural Diversity Database) was queried on December 12, 2017. No special status habitats are mapped within the parcel or contiguous parcels. Two special-status species are mapped in the vicinity – Pacific fisher (*Pekania pennanti*) and foothill yellow-legged frog (*Rana boylei*). However, no natural habitat was disturbed in establishment of this operation. No impacts to special-status species were identified from project implementation.

Licensees must comply with Section 1602 of the Fish and Game Code, or receive written verification from CDFW that a streambed alteration agreement is not required, before their cultivation license from CDFA would become effective. The Proposed Project will not divert or withdraw surface water, so there will be no impacts from alterations of streamflow. The Project Area does not contain any channels or wetlands. Hayfork Creek is found along the northern and western margins of the Parcel. The U.S. Fish and Wildlife wetland database, the National Wetland Inventory, was queried on January 3, 2018. The nearest wetlands are riverine wetlands in Hayfork Creek, located along the northern and western edge of the Project Area. The Proposed Project has established a minimum buffer distance of at least 300 feet to the nearest waterbodies.

Potential adverse impacts to water resources could occur during operation of cultivation activities by discharge of sediment or other pollutants (fertilizers, human waste, etc.) into receiving waterbodies. However, small quantities of organic pesticides are the only chemicals utilized by this cultivation operation. Additionally, the project proponent is enrolling in the State Water Board's Waste Discharge Requirements for Cannabis Cultivation Order WQ 2017-00XX-DWQ. Ongoing compliance with this Order will ensure that cultivation operations will not significantly impact water resources by using a combination of Best Management Practices (BMPs), buffer zones, sediment and erosion controls, inspections and reporting, and regulatory oversight. Therefore, no mitigation is required.

The risk of release of hazardous materials to water bodies will be significantly reduced because cultivators would be required to comply with Sections 8313(e) and (f) of the proposed regulations, which require compliance with pesticide laws and regulations (including those related to herbicides) as enforced by CDPR, and for any herbicides exempt from registration requirements, licensees must comply with all herbicide label directions, store chemicals in a secure building or shed, contain any chemical leaks and immediately clean up any spills, apply the minimum amount of product necessary to control the target pest (in this case a plant), and prevent off-site drift. This should minimize the potential for hazardous materials or pesticides to pollute waterbodies or affect aquatic species.

Impact BIO-2

Special-status plants could be adversely affected by erosion and sedimentation, trampling, fertilizer runoff from cultivation activities, or misapplication or drift of herbicides used on cultivation sites. Because cultivation sites would have already been developed before beginning operation, it is unlikely that they would contain special-status plant species that could be trampled.

There are no special-status plant species in the Project Area. No special-status plant species were observed on the parcel during the site survey by Natural Investigations Company. Because the operational areas are situated on areas that are disturbed or lack sensitive habitats, no impacts to special-status plant species should occur from project implementation.

In addition, cultivators would be required to comply with Sections 8313(e) and (f) of the proposed regulations, which require compliance with pesticide laws and regulations (including those related to herbicides) as enforced by CDPR, and for any herbicides exempt from registration requirements,

licensees must comply with all herbicide label directions, store chemicals in a secure building or shed, contain any chemical leaks and immediately clean up any spills, apply the minimum amount of product necessary to control the target pest (in this case a plant), and prevent off-site drift. This should minimize the potential for chemicals to impact special-status plant species.

Impact BIO-3

All types of cultivation operations may result in increased nighttime light compared to baseline conditions. Increased nighttime light is known to have adverse effects on nocturnal wildlife species. The CalCannabis Licensing Program regulations contain environmental protection measures that would require security lighting at grow operations to be selectively placed and shielded to minimize the effects of the lighting (Section 8313[b]), and would require mixed-light operations to eliminate any nighttime light trespass (Section 8314). In addition, to the extent they are required, a Lake or Streambed Alteration Agreement and/or incidental take permit under CESA (as issued by CDFW) may include protective measures for such impacts. With these measures in place, impacts of increased nighttime light on wildlife from the CalCannabis Licensing Program would not be substantial and this impact would be less than significant.

Impact BIO-4

Cannabis cultivation operations would likely result in increased noise and human presence in some areas. Increased noise levels would reduce the distance and area over which acoustic signals could be perceived by animals. Adverse effects on wildlife from noise could include changes in foraging and antipredator behavior, reproductive success, population density, and community structure. Increased human presence, which is often coupled with increased noise, is also known to cause disturbance to wildlife.

For outdoor cultivation operations, the primary sources of noise could include irrigation pumps, diesel generators, various landscaping equipment, vendor/equipment/water trucks, and worker vehicles. The noise-generating equipment with the greatest potential to adversely affect wildlife would be chainsaws and mowers (for outdoor or mixed-light operations), trucks, and emergency generators. In general, the noise generated by cannabis cultivation activities would be consistent with other land uses in the vicinity; for instance, chainsaws and mowers are commonly used in rural environments. As such, many wildlife species are anticipated to be habituated to the noise generated by cultivation.

Impacts would generally occur from new cultivation operations which are analyzed in Cumulative Impacts section. Section 8313 of the CalCannabis Licensing Program prohibits the use of gas- or diesel-powered generators except as a backup energy source in the event of a power outage or emergency; this is expected to reduce baseline emissions from cultivators who are relying upon generators as a primary power source. The existing and proposed gardens will have limited use of noise-generating equipment, and will result in less than significant impact upon wildlife.

Impact BIO-5

Water diversion, runoff and sedimentation, and discharges of other contaminants could adversely affect riparian habitat and other sensitive natural communities, such as wetlands, adjacent to cultivation sites. As described in Impact BIO-1, existing regulations and new regulatory programs specific to cannabis cultivation would be protective of aquatic habitats, including riparian areas and wetlands, by imposing limits on water diversions and requiring measures to minimize discharges to these habitats.

The Project Area does not contain riparian habitat or any other sensitive natural community. Riparian habitats will be protected by establishing a no-disturbance buffer of at least 300 feet. Potential adverse

impacts to water resources could occur during operation of cultivation activities by discharge of sediment or other pollutants (fertilizers, human waste, etc.) into receiving waterbodies. However, small quantities of organic pesticides are the only chemicals utilized by this cultivation operation. Additionally, the project proponent is enrolling in the State Water Board's Waste Discharge Requirements for Cannabis Cultivation Order WQ 2017-00XX-DWQ. Ongoing compliance with this Order will ensure that cultivation operations will not significantly impact water resources by using a combination of Best Management Practices (BMPs), buffer zones, sediment and erosion controls, inspections and reporting, and regulatory oversight. Implementation of the proposed project would have no impact upon sensitive natural communities.

Impact BIO-6

CDFA (2017) decided that cannabis cultivation operations under the CalCannabis Licensing Program would be of limited size (no larger than 1 acre), and therefore would typically not be large enough to substantially interfere with movement of wildlife. Even if multiple cultivation sites were located near one another, they would be unlikely to substantially impede wildlife movement because there would be separation between the cultivation sites. Indeed, many local jurisdictions have adopted setbacks or limits on the percentage of a parcel that can be dedicated to cannabis cultivation, allowing wildlife to pass through or around the area (CDFA 2017). As described in PEIR Impact BIO-1, the water rights process administered by SWRCB would ensure bypass flows that would be protective of fish migration needs and instream habitat, such as low-velocity refugia for immature fish. Fish, including steelhead trout (*Oncorhynchus mykiss*) and Chinook salmon (*Oncorhynchus tshawytscha*) exist in Hayfork Creek, which borders the northern and western margins of the Project Area. Fish habitat within Hayfork Creek will be protected by establishing a no-disturbance buffer of at least 300 feet. Implementation of the project will not interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

Impact BIO-7

Because the CalCannabis Licensing Program would be implemented throughout the state, it is likely that some licensed cannabis cultivation facilities would be within an area covered by an HCP or natural community conservation plan (NCCP). However, in general, the greatest potential for conflicts with these plans would occur during development of new cultivation facilities, rather than during ongoing cultivation operations. Establishment of new facilities is discussed in the Cumulative Impacts section of this Checklist. The parcel is not in the coverage area of an adopted habitat conservation plan. The Proposed Project would have no conflicts with habitat conservation plans.

Impact BIO-8

An applicant for a license must comply with all local ordinances and regulations, including those intended to protect biological resources. An applicant may provide documentation of compliance with local requirements to facilitate the application process. The Applicant is licensed under the County Cannabis cultivation ordinance as Type 2E small mixed light. Thus, the Proposed Project will not conflict with local policies or ordinances protecting biological resources.

Impact BIO-9 and BIO-10

There is a potential for adverse effects on wildlife from the use of pesticides. Licensees must comply with pesticide laws and regulations as enforced by the Department of Pesticide Regulation. For all pesticides that comply with these laws and regulations, and are exempt from registration requirements,

licensees shall comply with pesticide application and storage protocols. The PEIR concluded that application of pesticides in compliance with these regulations and protocols would not result in substantial adverse effects on wildlife. In accordance with CDPR guidance, under the CalCannabis Licensing Program cannabis cultivation operations are only allowed to use the following repellants in and around cannabis cultivation sites to protect their crops from rodent herbivory: capsicum oleoresin (consistent with the label), putrescent whole egg solids, and garlic. Because these are repellants and not rodenticides, they have no potential for secondary poisoning of non-target species. Implementation of the Proposed Project would not result in substantial adverse effects on wildlife from pesticide use.

Impact BIO-11

Increased noise and human presence at outdoor cannabis cultivation sites could adversely affect wildlife, including nesting birds. In particular, chainsaw or truck traffic could result in adverse effects on birds, particularly during the nesting season. Several federal and State laws have been established to protect birds (e.g., MBTA; California Fish and Game Code Sections 3503, 3503.5, and 3513), with which licensees would be required to comply. Compliance with these regulatory requirements would reduce the potential for impacts on nesting birds.

Mitigation Measures

None required.

CULTURAL RESOURCES

CULTURAL RESOURCES	Consistent with the PEIR, Less Than Significant	Inconsistent with the PEIR, Not Potentially Significant	Inconsistent with the PEIR, Potentially Significant	No Similar Impact
<i>Would the proposed activity result in impacts that differ from the following impacts identified and discussed in the CalCannabis Cultivation Licensing PEIR (see PEIR Chapter 4.5)?</i>				
Impact CR-1: Cause substantial adverse impacts on historical resources, archaeological resources, and human remains. (See PEIR pages 4.5-9 to 4.5-11.)	X			
<i>Would the proposed activity have other impacts not addressed above (refer to the checklist questions contained in Appendix G of the CEQA Guidelines)?</i>				
Impact:				

Consistency Analysis and Impact Analysis

Impact CR-1

Ground disturbance and/or other site development activities for the purposes of cannabis cultivation have the potential to affect cultural resources. Site development falls outside of the scope of the CalCannabis Licensing Program, which is a licensing program for the cultivation activities themselves. Potential construction activities associated with site development would need to be performed in accordance with all applicable local, State, and federal regulatory systems, including but not limited to those related to cultural resources. Local agencies would have responsibility for ensuring that site development complies with applicable regulations, including CEQA, through review and issuance of local permit, license, or other authorization for cannabis cultivation site development activities. Site development activities are analyzed in the Cumulative Impacts section of this Checklist.

Existing cultivation activities themselves would generally have limited potential for adverse impacts on cultural resources. However, cultivation may involve excavation within soil that has not been disturbed previously. As such, while considered unlikely, excavation could encounter buried historic or archaeological resources or human remains. A mitigation measure—CR-1—was added that would ensure that any unexpected discoveries of cultural resources during cultivation do not result in significant impacts.

It is also considered unlikely that cultivation itself would result in modification or demolition of historic structures that could affect the characteristics that make the building eligible for listing in the CRHR; such impacts would be more likely to occur as part of site development and, as a result, would be evaluated by the local agency during its approval process for site development. In addition, the CalCannabis Licensing Program's environmental protection measures related to cultural resources, specifically the accidental discovery of human remains (Section 8313[c] of the proposed regulations), would require applicants to halt cultivation activities and implement Health and Safety Code Section 7050.5 if human remains were discovered.

The existing buildings on the parcel (house, shed, storage sheds), are of modern construction. These structures are not at or nearing historic age (50 years). The Project would have no impact upon historic structures.

Mitigation

Mitigation Measure CR-1: Suspend Cultivation Immediately if Cultural Resources Are Discovered, Evaluate All Identified Cultural Resources for CRHR Eligibility, and Implement Appropriate Mitigation Measures for Eligible Resources.

Not all cultural resources are visible on the ground surface. As a result, before initiation of ground-disturbing activities, the licensee shall arrange for cultivation employees to receive training about the kinds of archaeological materials that could be present at the cultivation site and the protocols to be followed should any such materials be uncovered during cultivation. Training shall be conducted by an archaeologist who meets the U.S. Secretary of the Interior's professional standards. Training shall be required during each phase of cultivation to educate new cultivation personnel.

If any cultural resources, including structural features, unusual amounts of bone or shell, flaked or ground stone artifacts, historic-era artifacts, human remains, or architectural remains, are encountered during cultivation activities, work shall be suspended immediately at the location of the find and within a radius of at least 50 feet and the appropriate jurisdiction will be contacted.

All cultural resources uncovered during cultivation within the site shall be evaluated for eligibility for inclusion in CRHR. Resource evaluations shall be conducted by individuals who meet the U.S. Secretary of the Interior's professional standards in archaeology, history, or architectural history, as appropriate. If any of the resources meet the eligibility criteria identified in PRC Section 5024.1 or State CEQA Guidelines Section 21083.2(g), mitigation measures will be developed and implemented in accordance with State CEQA Guidelines Section 15126.4(b) before cultivation resumes.

For any resources eligible for listing in the CRHR that would be significantly adversely affected by cultivation, additional mitigation measures shall be implemented. Mitigation measures for archaeological resources may include (but are not limited to) avoidance; incorporation of sites within parks, greenspace, or other open space; capping the site; deeding the site into a permanent conservation easement; or data recovery excavation. Mitigation measures for archaeological resources shall be developed in consultation with responsible agencies and, as appropriate, interested parties such as Native American tribes. Implementation of the approved mitigation is required before resuming any cultivation activities with the potential to affect identified eligible resources at the site.

ENERGY USE AND GREENHOUSE GAS (GHG) EMISSIONS

ENERGY USE AND GREENHOUSE GAS EMISSIONS	Consistent with the PEIR, Less Than Significant	Inconsistent with the PEIR, Not Potentially Significant	Inconsistent with the PEIR, Potentially Significant	No Similar Impact
<i>Would the proposed activity result in impacts that differ from the following impacts identified and discussed in the CalCannabis Cultivation Licensing PEIR (see PEIR Chapter 4.6)?</i>				
Impact GHG-1: Potential to conflict with an applicable plan, policy, or regulation adopted to reduce the emissions of GHGs, result in wasteful, inefficient, and unnecessary consumption of energy, or cause a substantial increase in energy demand and the need for additional energy resources.	X			
Impact GHG-2: Use off-road equipment and motor vehicles for outdoor cultivation activities, resulting in GHG emissions.	X			
<i>Would the proposed activity have other impacts not addressed above (refer to the checklist questions contained in Appendix G of the CEQA Guidelines)?</i>				
Impact:				

Consistency Analysis and Impact Analysis

Impact GHG-1 and GHG-2

Typically, a connection to a local electricity provider's electrical system/network is used as a primary energy source for equipment. Additional energy sources could include on-site solar panels and diesel or gasoline generators. Mixed-light and outdoor cannabis cultivation practices involve a lower energy demand than indoor cultivation. Cultivation operations could also utilize fuel-powered equipment that would contribute to GHG emissions. Additional sources of GHG emissions would include employee vehicle use and truck trips associated with the commuting of workers to and from cultivation sites. Outdoor cannabis cultivation, under both baseline conditions and the CalCannabis Licensing Program, would involve the use of fuel-powered equipment and motor vehicles that would generate GHG emissions and contribute to climate change impacts. Section 8313 of the CalCannabis Licensing Program prohibits the use of gas- or diesel-powered generators except as a backup energy source in the event of a power outage or emergency; this is expected to reduce baseline emissions from cultivators who are relying upon generators as a primary power source. Operation of the proposed cultivation operation would generate small amounts of carbon dioxide from operation of small engines, such as generators for backup electrical supply, and from vehicular traffic associated with staff commuting. The proposed cultivation operation would not consume excessive amounts of energy. CDFA (2017) concluded that cannabis cultivation activities under the CalCannabis Licensing Program would not generate a substantial number of vehicle trips and would not require intensive use of heavy equipment, and as such, would not degrade air quality or produce significant amounts of greenhouse gasses. Because the proposed cultivation operation will not impact regional air quality, the project will not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Mitigation

None required.

GEOLOGY AND SOILS

GEOLOGY AND SOILS	Consistent with the PEIR, Less Than Significant	Inconsistent with the PEIR, Not Potentially Significant	Inconsistent with the PEIR, Potentially Significant	No Similar Impact
<i>Would the proposed activity result in impacts that differ from the following impacts identified and discussed in the CalCannabis Cultivation Licensing PEIR (see PEIR Chapter 4.0.10)?</i>				
Would the proposed activity expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	X			
Strong seismic ground shaking?	X			
Seismic-related ground failure, including liquefaction?	X			
Landslides?	X			
Would the proposed activity be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	X			
Would the proposed activity be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	X			
Would the proposed activity have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	X			

Consistency Analysis and Impact Analysis

The CalCannabis Licensing Program would not include construction of structures that could be subject to earthquake-related hazards, unstable soils, expansive soils, or other geotechnical hazards, and it would not entail construction of septic or other wastewater disposal systems. Thus, the CalCannabis Licensing Program would not expose individuals to increased geological or seismic hazards, would not construct structures on unstable soils, and would not create wastewater systems in unsuitable soils. Therefore, the CalCannabis Licensing Program's effects on geologic resources would not have the potential to be significant, either at a program level or cumulatively. The extent to which the CalCannabis Licensing Program could disturb soils and cause erosion of topsoil is discussed in the Hydrology and Water Quality section.

The parcel is not on, or near, a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning. The nearest earthquake fault is the Grogan fault, approximately 20 miles west of the Project Area. New greenhouse construction will require permitting from the County, which would address any seismic building standards. The Proposed Project would not require the construction of new septic tanks. There is already a flush toilet and septic system currently present on the parcel. A portable toilet may be rented for staff at the cultivation area. Therefore, impacts related to geology and soils would be less than significant.

Mitigation

None required.

HAZARDS, HAZARDOUS MATERIALS, AND HUMAN HEALTH

HAZARDS, HAZARDOUS MATERIALS, AND HUMAN HEALTH	Consistent with the PEIR, Less Than Significant	Inconsistent with the PEIR, Not Potentially Significant	Inconsistent with the PEIR, Potentially Significant	No Similar Impact
<i>Would the proposed activity result in impacts that differ from the following impacts identified and discussed in the CalCannabis Cultivation Licensing PEIR (see PEIR Chapter 4.7)?</i>				
Impact HAZ-1: Release hazardous materials from routine transport, use, and disposal. (See PEIR pages 4.7-17 to 4.7-18.)	X			
Impact HAZ-2: Create a significant hazard through release of hazardous materials from upset or accident conditions. (See PEIR page 4.7-18.)	X			
Impact HAZ-3: Cause health risks from pesticide use. (See PEIR pages 4.7-18 to 4.7-19.)	X			
Impact HAZ-4: Emit hazardous emissions or materials within 0.25 mile of a school. (See PEIR pages 4.7-19 to 4.7-20.)				X
Impact HAZ-5: Locate project activities on a hazardous materials site. (See PEIR page 4.7-20.)				X
Impact HAZ-6: Locate project activities near an airport or private airstrip such as to increase hazards. (See PEIR page 4.7-21.)	X			
Impact HAZ-7: Expose people or structures to substantial risk of loss from wildfire. (See PEIR pages 4.7-21 to 4.7-22.)	X			
Impact HAZ-8: Create substantial hazards for firefighters and first responders from indoor cultivation. (See PEIR pages 4.7-22 to 4.7-23.)	X			
<i>Would the proposed activity have other impacts not addressed above (refer to the checklist questions contained in Appendix G of the CEQA Guidelines)?</i>				
Impact:				

Consistency Analysis and Impact Analysis

Impact HAZ-1 and HAZ-2

Cannabis cultivation operations (both under baseline conditions and the CalCannabis Licensing Program) may involve the use of hazardous materials, such as fuel for power equipment and backup generators, and pesticides. Routine transport, handling, use, and disposal of these types of materials could expose people to hazards if adequate precautions are not taken.

Under the CalCannabis Licensing Program, cultivators would be required to store, use, and dispose of hazardous materials in accordance with a broad range of applicable laws and regulations. Depending on the size of the cultivation facility and nature of activities, licensees may be required to prepare a hazardous material business plan. Additionally, licensees under the CalCannabis Licensing Program would be required to comply with OSHA and Cal/OSHA requirements, such as maintaining SDSs for each chemical they use and providing personal protective equipment, as necessary, to protect the health of workers.

Compliance with existing laws and regulations related to transport, use, and disposal of hazardous materials would avoid creating a substantial hazard to the public. In addition, the CalCannabis Licensing Program would require that applicants identify designated pesticide and other agricultural chemical storage areas as part of their cultivation plan (Sections 8301[a][4] and 8302[a][5]). The CalCannabis Licensing Program regulations also would implement environmental protection measures which would limit potential releases of hazardous materials.

During a typical growing season, this cultivation operation stores the following fertilizers and amendments: Approximately 10 gallons each of marine hydrolysate, kelp, molasses, ocean water extract,

calcium, magnesium, ammonia, iron, manganese, zinc, copper acetates, boric acid, ammonia hydroxide and phosphoric acid. Up to 1,000 pounds of dry organic fertilizer “Backyard Blend” from Soilscape Solutions may also be stored. These chemicals are stored in a storm-proof shed. No other chemicals are used in this operation. Pests are controlled with natural predators. Therefore, no pesticides are used in this operation. A Site Management Plan will be prepared for this cultivation project, and it will identify Best Management Practices for chemical use and storage that will be implemented. The Site Management Plan will have a monitoring program that could identify any accidental chemical release and respond with appropriate cleanup. Operation of the Proposed Project will have a less than significant impact on hazardous materials.

Impact HAZ -2

As discussed above, cannabis cultivation operations may involve the use of hazardous materials, such as fuel for power equipment and generators, and pesticides. Transport, storage, and use of these materials could endanger human health and the environment in the event that upset or accident conditions cause a release of the materials. Numerous existing laws and regulations are designed to prevent spills of hazardous materials and limit damage in the event that such materials are released. The CalCannabis Licensing Program would only authorize lawful cultivation activities that comply with existing laws regarding storage and use of hazardous materials. California Health and Safety Code provisions and the CalARP program would require any cannabis cultivation facility storing more than a threshold quantity of regulated substances to prepare an HMBP. These plans would include emergency response procedures to coordinate response in the event of a release and chemical accident prevention measures. With adherence to existing hazardous materials laws, the risk of accidental releases of hazardous materials from cultivation activities that could cause substantial hazards is considered low.

In addition, the CalCannabis Licensing Program’s environmental protection measures (Sections 8301[a][4], 8302[a][5], and 8313 of the proposed regulations, as provided in Appendix A) would minimize potential accidental releases of hazardous materials by requiring licensees to store chemicals in a secure building or shed, and to contain any chemical leaks and immediately clean up any spills. Therefore, the risk of accidental releases of hazardous materials from lawful cannabis cultivation operations would be lower than many other ongoing activities in the state, including existing unpermitted cannabis cultivation activities.

Impact HAZ-3

The requirements contained in the proposed regulations (Sections 8313[e] and [f]) require compliance with pesticide laws and regulations as enforced by CDPR. For all pesticides that are compliant with CDPR’s laws and regulations and are exempt from registration requirements, licensees will be required to comply with pesticide application and storage protocols. The proposed regulations limit both the types of pesticides that may be used, as well as direct the methods in which pesticides may be used. With these measures in place, in consideration of likely reductions in risk at many locations over baseline conditions, this impact would be less than significant. The Proposed Project will use only beneficial insects and other natural predators to control pests.

Impact HAZ-4

There is a low probability that cannabis cultivation would emit substantial hazardous emissions based on the nature of such cultivation activities. Given MC RSA and AUMA requirements that cannabis facilities be located a minimum of 600 feet from existing and proposed schools, and the various Proposed Program measures and other legal requirements described throughout this section which would minimize the intentional or accidental release of emissions, there is no reason to believe that impacts related to

emissions of hazardous materials near schools would be significant. To the extent that such impacts could occur, they would be considered based on site-specific information provided as part of the application process to determine if additional measures are needed to prevent or avoid significant impacts. The nearest school is Hayfork High School, and is located 1.3 miles from the Proposed Project. Operation of the Proposed Project will not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances.

Impact HAZ-5

The CalCannabis Licensing Program regulations (Section 8102[b][19]) would require that applicants have conducted a hazardous materials record search of the EnviroStor database for the proposed premises. If hazardous sites were encountered, the regulations require that applicants provide documentation of protocols implemented to protect employee health and safety.

The following hazardous materials databases were queried in January 2018:

- EnviroStor is an online search and Geographic Information System tool for identifying sites that have known contamination or sites for which there may be reasons to investigate further. The EnviroStor database includes the following site types: Federal Superfund sites (National Priority List); State Response, including Military Facilities and State Superfund; Voluntary Cleanup; and School sites.
- GeoTracker is a geographic information system maintained by the California State Water Resources Control Board (SWRCB) that provides online access to environmental data at the Internet address (URL) = <http://geotracker.waterboards.ca.gov/>.

The GeoTracker database and EnviroStor database reported no cases associated with the Parcel. The following contamination incidents were reported in the region:

- EnviroStor: The former Sierra Pacific lumber mill at Mill Avenue and Highway 3. This site is being studied to determine if property is contaminated.
- GeoTracker: The CDOT Hayfork Maintenance Station on Morgan Hill Road in Hayfork. GeoTracker indicates that a site investigation and corrective action were completed in 2006.
- GeoTracker: Talrocca Industries at 100 Mill Road. Contamination was detected from a leaking underground storage tank (gasoline) across Hayfork Creek from the Project Area. Cleanup was completed in 2014.(Note: This is the same location as the former Sierra Pacific site)

The site survey revealed no evidence of buried storage tanks or soil contamination. There was no indication that the parcel has previously been used for an industrial purpose.

Impact HAZ-6

Siting of cannabis cultivation operations in relation to airports or private airstrips would be determined through local land use permitting and environmental review. In general, cannabis cultivation operations would not include tall structures, substantial sources of glare or dust, or other characteristics that could interfere with air traffic. Therefore, this impact would be less than significant.

The nearest airstrip or airport is Hayfork Airport, which is approximately 1.5 miles to the west of the Project Area. The project site is not within an airport land use plan and is not in the vicinity of approach/departure flight path of a private airstrip.

Impact HAZ-7 and HAZ-8

Cannabis cultivation sites may be located in areas of high risk for wildfire. Cannabis cultivation also could increase risk of fire and/or introduce ignition sources or flammable materials to an area. While cannabis cultivation operations located in rural areas, areas designated as High Fire Hazard Severity Zones, or at the urban-wildland interface could expose workers and structures at the site to risk of loss from wildfire, this hazard would not be substantially worse than that for other types of land uses in the same areas, and would be reduced compared to cannabis cultivation occurring under baseline conditions. Existing laws, such as requirements for maintenance of defensible space around structures in SRA, and implementation of environmental protection measures specified in the CalCannabis Licensing Program regulations would be anticipated to reduce potential impacts. The combination of these existing regulations and protective measures would reduce fire risk from grow operations to a less-than-significant level.

Mitigation

No mitigation is needed.

HYDROLOGY AND WATER QUALITY

HYDROLOGY AND WATER QUALITY	Consistent with the PEIR, Less Than Significant	Inconsistent with the PEIR, Not Potentially Significant	Inconsistent with the PEIR, Potentially Significant	No Similar Impact
<i>Would the proposed activity result in impacts that differ from the following impacts identified and discussed in the CalCannabis Cultivation Licensing PEIR (see PEIR Chapter 4.8)?</i>				
Impact HWQ-1: Cause adverse effects on beneficial uses from surface water diversions for crop irrigation, or cause insufficiency of surface water supplies. (See PEIR pages 4.8-35 to 4.8-36.)	X			
Impact HWQ-2: Cause aquifer depletion from use of groundwater for crop irrigation and result in insufficiency of groundwater supplies. (See PEIR pages 4.8-36 to 4.8-38.)	X			
Impact HWQ-3: Cause discharges of sediment, nutrients, or other contaminants (excluding pesticides) from outdoor or mixed-light cultivation. (See PEIR pages 4.8-38 to 4.8-39.)	X			
Impact HWQ-4: Cause water quality impacts from pesticide use in outdoor or mixed-light cultivation. (See PEIR pages 4.8-39 to 4.8-40.)	X			
Impact HWQ-5: Cause discharges of sediment, nutrients, and other contaminants (excluding pesticides) from indoor cultivation operations. (See PEIR pages 4.8-40 to 4.8-41.)				X
Impact HWQ-6: Cause water quality impacts from pesticide use in indoor cultivation. (See PEIR page 4.8-41.)				X
<i>Would the proposed activity have other impacts not addressed above (refer to the checklist questions contained in Appendix G of the CEQA Guidelines)?</i>				
Impact:				

Consistency Analysis and Impact Analysis

Impact HWQ-1

The diversion of surface water for use in irrigating cannabis crops has the potential for several impacts on water quality or quantity. As part of the application process, Proposed Program applicants would be required to identify their operations' water supply source and provide supplemental information regarding the source (Sections 8102(b)(24) and 8109 of the Proposed Regulations). An applicant proposing to use a surface water diversion (or a diversion of underflow from a surface waterbody) would need to provide evidence that the diversion is authorized by the SWRCB. For an applicant planning to obtain surface water supplies from a water purveyor, the purveyor also would be required to have a valid water right and would be subject to the same requirements of SWRCB. The measures that would be required by the SWRCB to protect water quality, instream beneficial uses, and other legal users of water would avoid substantial impacts on water quality and water supplies from surface water diversions. Cultivation without a sufficient water supply would be infeasible and could not be licensed under the CalCannabis Licensing Program. Water use requirements for outdoor cannabis production are similar to water use requirements for other agricultural crops such as corn (CDFA 2017). The Proposed Project will not divert surface water. Therefore, this impact would be less than significant.

Impact HWQ-2

The CalCannabis Licensing Program regulations would require license applicants to provide information in the cultivation plan regarding the water source(s) to be used for cultivation. Water use requirements for outdoor cannabis production are generally in line with water use for other agricultural crops. Based on the relatively low quantities of water use (from 0.002 to 1.8 acre-feet per year), the likelihood that an individual cultivator or group of cultivators using groundwater from a defined alluvial aquifer would, by

themselves, cause substantial groundwater overdraft is considered unlikely. Cultivation activities under the CalCannabis Licensing Program would have low potential to substantially interfere with groundwater recharge, because the acreage restrictions established in the regulations would limit the amount of impervious surface that could be added as a result of any new cultivation operation. The Proposed Project will use a permitted groundwater well for the water supply, and the annual water consumption is estimated at 2,300 gallons per week, or approximately 0.4 acre-feet per year. This water consumption rate is consistent with the baseline conditions analyzed in the PEIR. The Proposed Project's impact upon groundwater supplies is less than significant.

Impact HWQ-3 and HWQ-4

Outdoor cultivation operations involve ground-disturbance during planting and soil preparation activities that could mobilize sediment, as well as exposed soils that could be mobilized during storm events, causing erosion to surface waterbodies. These activities could potentially result in exceedances of applicable water quality standards in receiving waterbodies; however, it is anticipated that many of these activities would not continue or would improve under the CalCannabis Licensing Program. CalCannabis Licensing Program regulations (Section 8305[b]) would require that licensees manage all hazardous waste in compliance with all applicable hazardous waste statutes and regulations. The Applicant is enrolling in the State Water Board's Waste Discharge Requirements for Cannabis Cultivation Order WQ 2017-00XX-DWQ. Ongoing compliance with this Order will ensure that cultivation operations will not significantly impact water resources by using a combination of Best Management Practices (BMPs), buffer zones, sediment and erosion controls, inspections and reporting, and regulatory oversight. The Proposed Project does not intend to discharge any waste. Therefore, no mitigation is required.

Impact HWQ-5 and HWQ-6

Pertains only to indoor cultivation. The Proposed Project is an outdoor cultivation operation.

Mitigation

None required.

LAND USE AND PLANNING

LAND USE AND PLANNING	Consistent with the PEIR, Less Than Significant	Inconsistent with the PEIR, Not Potentially Significant	Inconsistent with the PEIR, Potentially Significant	No Similar Impact
<i>Would the proposed activity result in impacts that differ from the following impacts identified and discussed in the CalCannabis Cultivation Licensing PEIR (see PEIR Chapter 4.9)?</i>				
Impact LU-1: Physically divide an established community. (See PEIR pages 4.9-4 to 4.9-5.)	X			
Impact LU-2: Conflict with applicable land use plans, policies, or regulations. (See PEIR page 4.9-5.)	X			

Consistency Analysis and Impact Analysis

Impact LU-1

Cannabis cultivation is not a land use type that would typically physically divide an established community (such as construction of a road or railway through an existing developed area). It is unlikely that a local jurisdiction would approve cultivation activities that physically divide its community. The ordinances adopted to date suggest that, to the contrary, the requirements of local jurisdictions would generally avoid such an outcome. Applicants under the CalCannabis Cultivation Licensing program would be required to comply with general plan policies, and any local ordinances as part of the approval process undertaken by the local agency and/or other responsible agencies. The Proposed Project will not physically divide an established community, because no new roads or large structures are planned.

Impact LU-2

Unpermitted and/or illegal cannabis cultivation has been reported to conflict with applicable land use plans, policies, or regulations, and many local jurisdictions have adopted or are developing ordinances related to cannabis cultivation. Requirements of the CalCannabis Licensing Program would help ensure that cannabis cultivation activities are conducted in accordance with State and local laws and regulations, including local land use plans, local coastal programs, and zoning ordinances. The parcel's General Plan designation is "Agriculture" and the parcel is zoned "A10 - Agriculture 10 acre minimum". The proposed project is a registered cultivation operation under the Trinity County Commercial Cannabis Cultivation Regulations (Ordinance No. 315-823). Thus, the Proposed Project will not conflict with any applicable land use plan, policy, or regulation.

Mitigation

None required.

MINERAL RESOURCES

MINERAL RESOURCES	Consistent with the PEIR, Less Than Significant	Inconsistent with the PEIR, Not Potentially Significant	Inconsistent with the PEIR, Potentially Significant	No Similar Impact
<i>Would the proposed activity result in impacts that differ from the following impacts identified and discussed in the CalCannabis Cultivation Licensing PEIR (see PEIR Chapter 4.0.10)?</i>				
Would the proposed activity result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	X			
Would the proposed activity result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	X			

Consistency Analysis and Impact Analysis

The CalCannabis Licensing Program would not include any activities that would have the potential to affect mineral production sites. The Surface Mining and Reclamation Act requires that local jurisdictions enact planning procedures to guide mineral conservation and extraction at particular sites and to incorporate mineral resource management policies into their general plans. On this basis, it is presumed that counties would, as needed and as applicable, encourage the conservation (i.e., protection from incompatible land uses) of areas designated as having substantial potential for mineral extraction and discourage development that would substantially preclude the future development of mining facilities in these areas. The potential for the extraction of substantial mineral resources from lands classified by the State as areas that contain mineral resources (Mineral Resource Zone [MRZ]-3) would be considered by counties at a local level when making land use decisions. For these reasons, no significant impacts are anticipated related to the availability or use of a known, valuable mineral resource, either at a program level or cumulatively. According to the Mineral Lands Classification data portal (California Geological Survey, 2017), the Project Area is not in a mineral classification area. The Project would have no impact upon mineral resources.

Mitigation

None required.

NOISE

NOISE	Consistent with the PEIR, Less Than Significant	Inconsistent with the PEIR, Not Potentially Significant	Inconsistent with the PEIR, Potentially Significant	No Similar Impact
<i>Would the proposed activity result in impacts that differ from the following impacts identified and discussed in the CalCannabis Cultivation Licensing PEIR (see PEIR Chapter 4.10)?</i>				
Impact NOI-1: Expose people or residences to excessive noise levels within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport. (See PEIR page 4.10-16.)	X			
Impact NOI-2: Use mechanical equipment for the cultivation of cannabis resulting in generation of excessive groundborne vibration or groundborne noise levels. (See PEIR pages 4.10-16 to 4.10-17.)	X			
Impact NOI-3: Use of mechanical equipment for the cultivation of cannabis resulting in a substantial permanent increase in ambient noise levels in the vicinity of a Proposed Program activity above levels existing without the Proposed Program. (See PEIR page 4.10-17.)	X			
Impact NOI-4: Use mechanical equipment for the cultivation of cannabis resulting in excessive noise for sensitive receptors, and/or resulting in a substantial temporary or periodic increase in ambient noise levels. (See PEIR pages 4.10-18 to 4.10-19.)	X			
<i>Would the proposed activity have other impacts not addressed above (refer to the checklist questions contained in Appendix G of the CEQA Guidelines)?</i>				
Impact:				

Consistency Analysis and Impact Analysis

Impact NOI-1

Although it is possible that some cannabis cultivation sites licensed under the CalCannabis Licensing Program may be located near existing airports or airstrips, these cultivation operations are not anticipated to expose nearby residents or workers to substantial additional noise levels beyond those already generated by the airport or airstrip. Specifically, noise-generating sources used for cultivation operations (generally temperature and climate control equipment) would not be significantly different than other climate control equipment used for other land uses. The project is located approximately 1.5 miles from a public use airport, and is not located within an airport land use plan area.

Impact NOI-2, NOI-3, and NOI-4

Residents in less-developed areas are the most sensitive noise receptors for these sources, as noise from adjacent cannabis cultivation activities may be the only significant human-caused noise sources affecting these properties. The degree to which sound reaches residents from adjacent areas depends on a number of factors, including the type and location of activity being conducted, distance to residence, intervening vegetation topography, the building materials of the home, and other factors. The likelihood of any sensitive buildings being located close enough to the cannabis cultivation activities to cause human annoyance or building damage would be small. In addition, licensees under the CalCannabis Licensing Program would be required to comply with all federal, State, and local policies, rules, and regulations, including vibration criteria.

For the Proposed Project, the existing noise environment is dominated by the sound of flowing water in Hayfork Creek. Other noise sources are occasional road traffic, air traffic from private airstrips, wind, and birds. The existing and proposed gardens are over 280 feet away from the nearest off-site residence.

The nearest sensitive receptors are a daycare and high school that are approximately 1 mile to the west, Project Area. The proposed project does not require the prolonged use of mobile generators and does not involve any permanent noisy machinery. Cultivation within greenhouses will require the use of fans for cooling and supplemental lighting. Small engines such as rototillers and tractors will not be utilized for this operation. CDFA (2017) concluded that cannabis cultivation activities under the CalCannabis Licensing Program would not generate a substantial number of vehicle trips, so noise from commuting personnel is not a significant noise source. These generous buffer distances, plus the limited use of noise-generating equipment, will result in less than significant impact upon sensitive receptors.

Mitigation

None required.

POPULATION AND HOUSING

POPULATION AND HOUSING	Consistent with the PEIR, Less Than Significant	Inconsistent with the PEIR, Not Potentially Significant	Inconsistent with the PEIR, Potentially Significant	No Similar Impact
<i>Would the proposed activity result in impacts that differ from the following impacts identified and discussed in the CalCannabis Cultivation Licensing PEIR (see PEIR Chapter 4.0.10)?</i>				
Would the proposed activity induce substantial population growth in an area, either directly or indirectly?	X			
Would the proposed activity displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	X			
Would the proposed activity displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	X			

Consistency Analysis and Impact Analysis

The CalCannabis Licensing Program is not anticipated to change the overall extent of cannabis cultivation in the state and, therefore, would not create a substantial number of new jobs that could induce population growth. The CalCannabis Licensing Program also does not include construction of new housing or displace existing housing, and would not result in construction of infrastructure or include other activities that could indirectly induce or remove an obstacle to population growth. Therefore, the CalCannabis Licensing Program would have no potential to cause adverse effects related to population growth or housing demand. No impact would occur on population and housing, either at a program level or cumulatively.

The Proposed Project will not create new residential development or roads, but instead make use of the existing infrastructure. Immigrant farm labor is not required because the cultivation operation is small scale. No residences will be removed and no people need to be relocated. There are no impacts to population or housing.

Mitigation

None required.

PUBLIC SERVICES

PUBLIC SERVICES	Consistent with the PEIR, Less Than Significant	Inconsistent with the PEIR, Not Potentially Significant	Inconsistent with the PEIR, Potentially Significant	No Similar Impact
<i>Would the proposed activity result in impacts that differ from the following impacts identified and discussed in the CalCannabis Cultivation Licensing PEIR (see PEIR Chapter 4.11)?</i>				
Impact PS-1: Cause a substantial adverse impact related to police protection services. (See PEIR pages 4.11-6 to 4.11-9.)	X			
Impact PS-2: Cause a substantial adverse impact related to schools. (See PEIR pages 4.11-9 to 4.11-10.)	X			
Impact PS-3: Cause a substantial adverse impact related to parks or other public services. (See PEIR page 4.11-10.)	X			
Impact PS-4: Cause a substantial adverse impact related to fire protection services from outdoor cultivation. (See PEIR pages 4.11-10 to 4.11-11.)	X			
Impact PS-5: Cause a substantial adverse impact related to fire protection services from indoor cultivation. (See PEIR pages 4.11-11 to 4.11-13.)				X
Impact PS-6: Cause a substantial adverse impact related to fire protection services from mixed-light cultivation. (See PEIR page 4.11-13.)	X			
<i>Would the proposed activity have other impacts not addressed above (refer to the checklist questions contained in Appendix G of the CEQA Guidelines)?</i>				
Impact:				

Consistency Analysis and Impact Analysis

Impact PS-1

The Proposed Program would require that applicants for cannabis cultivation licenses must comply with all regulations and ordinances of the local jurisdiction, including those related to commercial cannabis cultivation, as well as any other applicable regulations and ordinances. Some local jurisdictions already require commercial cannabis cultivators to implement security measures, such as video surveillance and alarm systems, to prevent unlawful diversion of cannabis and to deter crime. Implementation of the CalCannabis Licensing Program may decrease pressure on police protection resources. The PEIR concluded that while some crime associated with licensed cannabis cultivation activities is likely to continue, no information has been found that indicates that the CalCannabis Licensing Program would increase law enforcement needs overall compared to baseline conditions. If anything, demand may decrease due to a larger number of lawful cultivators and their coordination and cooperation with law enforcement authorities.

Impact PS-2

Under the CalCannabis Licensing Program, CDFA would not license cultivation sites within 600 feet of schools, reducing the potential for conflicts with school operations. In addition, planning efforts and permitting decisions by local government (related to commercial cannabis cultivation or otherwise) should help address any potential for siting conflicts or inconsistencies. The nearest school is approximately 1 mile to the west of the Project Area. There will be no impact upon schools from implementation of the Proposed Project.

Impact PS-3

The CalCannabis Licensing Program is not expected to cause direct adverse impacts to parks or other public facilities. There will be no impact upon parks or public facilities from implementation of the Proposed Project.

Impact PS-4 and PS-6

Outdoor cultivation activities would have the potential to generate calls for fire protection service. Outdoor cultivation could involve uses that would generate fire risk (e.g., storage and use of flammable materials, use of power equipment), but this risk would not be substantially different from that posed by other agricultural operations that use similar equipment and practices, and would not be substantial. Local jurisdictions would incorporate the need for adequate fire protection services into their planning efforts—related to cannabis cultivation or otherwise—such as through their general plans and/or impact development fee processes. The Proposed Project carries no greater risk for wildfire than row crop agricultural activities. Fire breaks exist in the form of roads. Electrical service installations in greenhouses are permitted and inspected by the County. There will be no significant impact upon fire protection services.

Mitigation

None required.

RECREATION

RECREATION	Consistent with the PEIR, Less Than Significant	Inconsistent with the PEIR, Not Potentially Significant	Inconsistent with the PEIR, Potentially Significant	No Similar Impact
<i>Would the proposed activity result in impacts that differ from the following impacts identified and discussed in the CalCannabis Cultivation Licensing PEIR (see PEIR Chapter 4.0.10)?</i>				
Would the proposed activity increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	X			
Does the proposed activity include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	X			

Consistency Analysis and Impact Analysis

Under the CalCannabis Licensing Program, cultivation would not be allowed on public lands that may be used for recreation. Although some licensed cultivation sites may be located near recreational areas, the CalCannabis Licensing Program would not include any actions (or cause population growth) that would affect the availability or use of recreation sites. As such, it would not have any potential to cause or accelerate physical deterioration of recreational facilities, or include or require construction or expansion of such facilities. No impact would occur on recreation, either at a program level or cumulatively. The park closest to the Project Area is Hayfork Park, which is over 2.5 miles to the west of the Project Area. The nearest school is 1 mile to the west. The Proposed Project would not involve parks or recreational facilities.

Mitigation

None required.

TRANSPORTATION AND TRAFFIC

TRANSPORTATION AND TRAFFIC	Consistent with the PEIR, Less Than Significant	Inconsistent with the PEIR, Not Potentially Significant	Inconsistent with the PEIR, Potentially Significant	No Similar Impact
<i>Would the proposed activity result in impacts that differ from the following impacts identified and discussed in the CalCannabis Cultivation Licensing PEIR (see PEIR Chapter 4.12)?</i>				
Impact TRA-1: Conflict with circulation plans, ordinances, or policies. (See PEIR pages 4.12-4 to 4.12-7.)	X			
Impact TRA-2: Conflict with congestion management programs. (See PEIR pages 4.12-7 to 4.12-8.)	X			
Impact TRA-3: Result in a change to air traffic patterns. (See PEIR page 4.12-8.)				X
Impact TRA-4: Increase hazards due to a design feature or incompatible uses. (See PEIR page 4.12-8.)	X			
Impact TRA-5: Result in effects on emergency access. (See PEIR page 4.12-8.)	X			
Impact TRA-6: Result in effects related to public transit, bicycle, or pedestrian facilities. (See PEIR pages 4.12-8 to 4.12-9.)	X			
<i>Would the proposed activity have other impacts not addressed above (refer to the checklist questions contained in Appendix G of the CEQA Guidelines)?</i>				
Impact:				

Consistency Analysis and Impact Analysis

Impact TRA-1, TRA-2, TRA-4, TRA-5, and TRA-6

Cannabis cultivation activities could generate vehicle trips from employees commuting to and from the site, movement or shipment of goods and equipment, and, for certain cultivation sites that also serve as retail locations, customers coming and going to the site to purchase products.

That said, in general, cannabis cultivation is not anticipated to generate substantial numbers of vehicle trips, as individual cultivation sites would be limited in size, and (as indicated by the reference operation discussed above) most sites would not contain a high density of employees or involve a large number of deliveries. Therefore, substantial conflicts with circulation plans, ordinances, or policies are not considered likely. While there could be impacts in particular locations, this is not anticipated to be a substantial issue considering the state as a whole. To the extent that local jurisdictions implement an approval process for cultivation, these agencies would consider and address these site-specific issues, such as ingress/egress, parking, and other requirements, in conformance with their own local traffic-related policies and with CEQA. Overall, this impact would be less than significant.

The Project Area is accessed by a private, gravel driveway off of Morgan Hill Road. Morgan Hill Road dead-ends approximately 0.25 miles east of the Project Area. Traffic on this segment of road is generally limited to the four residences at the end of the road. The nearest cross-street is Forest Road 31N17, which heads south off of Morgan Hill Road just before the Project Area. Most regional eastbound and westbound traffic utilizes Morgan Hill Road, west of the project area, and northbound and southbound traffic use Bridge Road and Highway 3. The roads closest to the Project Area, Josh Lane and Genest Street, are used only for local access to residences and agricultural operations. Morgan Hill Road is a two-lane paved rural road. The anticipated trip generation for the proposed project is based upon project staffing: 2 to 4 trips per day from 1 to 2 persons commuting per garden per day for cultivation operations, spanning 12 months. No additional vehicle trips are anticipated for this project. The proposed project does

not propose any new development, construction, or physical change to the environment that would directly or indirectly result in any impacts to transportation and traffic on the ground or in the air.

Mitigation

None required.

TRIBAL CULTURAL RESOURCES

TRIBAL CULTURAL RESOURCES	Consistent with the PEIR, Less Than Significant	Inconsistent with the PEIR, Not Potentially Significant	Inconsistent with the PEIR, Potentially Significant	No Similar Impact
<i>Would the proposed activity result in impacts that differ from the following impacts identified and discussed in the CalCannabis Cultivation Licensing PEIR (see PEIR Chapter 4.13)?</i>				
Impact TCR-1: Cause a substantial adverse impact on tribal cultural resources. (See PEIR pages 4.13-8 to 4.13-9.)	X			
<i>Would the proposed activity have other impacts not addressed above (refer to the checklist questions contained in Appendix G of the CEQA Guidelines)?</i>				
Impact:				

Consistency Analysis and Impact Analysis

Impact TCR-1

Cannabis cultivation operations could require the construction of new or upgraded facilities (i.e., expanded grow or storage space, roads, water systems, electrical connections) that could result in direct impacts on existing TCRs within the premises of the cultivation operations, particularly those that are archaeological in nature. However, site development activities such as construction of new or upgraded facilities are outside the scope of the CalCannabis Licensing Program and would instead be approved by the local jurisdiction. Therefore, impacts from development activities are not considered here; they are discussed in the Cumulative Impacts section of this Checklist.

In general, local governments would be responsible for conducting consultations with Native American tribes and evaluating impacts on (and, as applicable, developing mitigation for) TCRs through their local approval process, either for a site development process or for approval of a cannabis cultivation operation. However, because not all local governments will have an approval process for cannabis cultivation, CDFA will review individual license applications to determine whether tribes have already been consulted and impacts addressed by the local agency. If not, CDFA would implement Mitigation Measure TCR-1 (Consult with Native American Tribes and Prepare and Implement Treatment Plans for any TCRs Identified at the Site) to ensure compliance with State laws protecting TCRs. Through that process, any TCRs that could be affected by the cultivation operation would be identified through CDFA consultation with Native American tribes under PRC Sections 21080.3.1-21080.3.2, including any mitigation measures, as required in PRC Section 21082.3. Therefore, this impact would be less than significant with mitigation.

Ethnographically, the parcel is located in the lands traditionally occupied by the Wintu (Callaghan 1978; Kroeber 1925). Traditional territories of the Nongatl were located west, with Lassik and Nomlaki to the south, and Chimariko to the north. There are no known tribal cultural resources within the project site. The Project would have no impact related to documented tribal cultural resources.

While not expected, it is possible that buried archaeological resources may be found that could be recognized as tribal cultural resources. As discussed earlier, implementation of Mitigation Measures CR-1 (Suspend Cultivation Immediately if Cultural Resources Are Discovered, Evaluate All Identified Cultural Resources for CRHR Eligibility, and Implement Appropriate Mitigation Measures for Eligible Resources) would ensure that applicants comply with State laws relating to protection of cultural resources. Therefore, this impact would be less than significant with mitigation.

Mitigation

Mitigation Measure TCR-1: Consult with Native American Tribes and Prepare and Implement Treatment Plans for any TCRs Identified at the Site.

If tribes have not already been consulted for a particular cultivation license, CDFA shall conduct such consultation. This consultation will include coordination with local jurisdictions and/or the NAHC to identify tribes with a traditional and cultural affiliation to the site. CDFA will then send letters to relevant tribal representatives describing the proposed cultivation activity and inviting the tribe to engage in consultation and provide input on any potential TCRs that could be adversely affected.

If TCRs are identified through this process, CDFA shall consult and work with the tribes to develop feasible alternatives or mitigation measures that will avoid impacts or develop and implement treatment plans that will substantially lessen the impacts on identified TCRs, in accordance with PRC Sections 21083(b)(2) or 21084.3.

The Proposed Project is an existing cultivation operation with approximately 6,483 square feet of greenhouse space, which will be expanded with the two new gutter-connected greenhouses by 17,280 square feet for a total of 23,763 square feet of greenhouse space. A well currently serves the single-family residence and existing cannabis operation. This is a permitted well that produces approximately 100 gallons per minute. The proposed garden will be irrigated by water from the existing well, which will be pumped and stored in a 1,000 gallon tank. The water will be pumped into each greenhouse via PVC piping. Black poly tubing and emitters (drip irrigation) will be used to distribute the water to each planting station.

Aesthetics

Site development has the potential to have substantial temporary and/or permanent effects on existing scenic vistas, scenic resources, designated State scenic highways, and/or the existing visual character or quality of a particular site and its surroundings. Additionally, construction of new facilities and modifications to existing facilities could involve use of additional lighting that could create impacts on adjacent and nearby properties, residences, and/or motorists traveling on nearby roadways. However, the Proposed Project will not impact visual resources adversely. The cultivation operation is at least 280 feet away from other residences and 40 feet away from the nearest public road (Morgan Hill Road). Furthermore, neighboring parcels also engage in Cannabis cultivation, so the proposed land use is consistent with the current character of the surroundings. There will be no significant impacts from implementation of the Proposed Project.

Agriculture and Forestry Resources

Conversion of agricultural lands to nonagricultural uses is occurring throughout the state as a result of population growth, urbanization, and other land uses. While cannabis cultivation itself is an agricultural activity, site development for cultivation may involve the conversion of areas of farmland to nonagricultural uses, such as for ancillary structures not directly related to cultivation (e.g., residences). Other forms of cannabis commerce may require site development that converts farmland to nonagricultural uses. Implementation of the Proposed Project will not require the removal of trees or the conversion of land to nonagricultural uses. No new roads need to be constructed. There will be a less than significant impact.

Air Quality

Licensed cultivators (new and existing) would be prohibited from using generators as a main energy source, and indoor cultivators would be required to reduce their GHG emissions to a level that would be in alignment with statewide GHG reduction goals. Short-term construction emissions could include fugitive dust and other particulate matter, as well as exhaust emissions generated by earthmoving activities and operation of grading or tilling equipment during site preparation. Construction emissions are caused by onsite or offsite activities. Onsite emissions principally consist of exhaust emissions (NOX, CO, ROG, PM10, and PM2.5) from heavy-duty construction equipment, motor vehicle operation, and fugitive dust (mainly PM10) from disturbed soil. Offsite emissions are caused by motor vehicle exhaust from delivery vehicles as well as worker traffic, but they also include road dust (PM10). However, no major construction-related activities are needed for implementation of the proposed cultivation operation. Only a few persons working for a few days will be needed for site preparation, and such low numbers of man-hours and vehicle trips would not generate significant vehicle emissions.

Fugitive dust is addressed in the project's Site Management Plan, which identifies Best Management Practices for soil stockpiling and the control of fugitive dust. Fugitive dust will be controlled by wetting

the soil with a mobile water tank and hose, or by delaying ground disturbing activities until site conditions are not windy.

Biological Resources

Site development for licensed cannabis cultivation also has the potential for adverse impacts on biological resources, as do other types of development. As the state's population grows, pressure on biological systems is anticipated to increase, and overall impacts on biological resources are considered to be a significant cumulative impact in light of past, present, and reasonably foreseeable future activities. For site development related to cannabis cultivation, such activities would often be subject to local approval and related environmental review, which would help address and reduce potential impacts on biological resources. In addition, site development must comply with Section 1602 of the Fish and Game Code and must also comply with CESA, which requires incidental take authorization from CDFW prior to take of a species listed as threatened or endangered under this act.

Because the proposed cultivation area and its supporting facilities are situated on areas that are already disturbed and lack sensitive habitats, a less than significant impacts to special-status species and special status habitats will occur from project implementation. The Project Area will not directly affect receiving waterbodies. The operation areas are at least 300 feet away from the nearest waterbodies. The project proponent is enrolling in the State Water Board's Waste Discharge Requirements for Cannabis Cultivation Order WQ 2017-00XX-DWQ. Ongoing compliance with this Order will ensure that cultivation operations will not significantly impact water resources by using a combination of Best Management Practices (BMPs), buffer zones, sediment and erosion controls, inspections and reporting, and regulatory oversight.

The Study Area contains suitable nesting habitat for various bird species because of the presence of trees, poles, and dense brush. However, no nests or nesting activity was observed in the project area during the field survey. Trees must be inspected for the presence of active bird nests before tree felling or ground clearing. If active nests are present in the Project Area during construction of the project, CDFW should be consulted to develop measures to avoid "take" of active nests prior to the initiation of any construction activities. Avoidance measures may include establishment of a buffer zone using construction fencing or the postponement of vegetation removal until after the nesting season, or until after a qualified biologist has determined the young have fledged and are independent of the nest site.

By complying with existing regulatory programs, and by implementing avoidance measures, the Proposed Project will have a less than significant effect on biological resources.

Hazards, Hazardous Materials, and Human Health

Construction and site development for cannabis cultivation facilities could create hazards to the public and the environment from transport, storage, use, and disposal of hazardous materials (e.g., fuel, solvents). These activities could result in accidental spills or releases of hazardous materials, as well as exposure of workers to toxic constituents, without adequate precautions.

Cannabis cultivation under the CalCannabis Licensing Program would be required to comply with existing laws and regulations related to hazardous materials, such as federal Occupational Safety and Health Administration and California Department of Industrial Relations, Division of Occupational Safety and Health requirements related to worker exposure to toxic materials and, in some cases, Health and Safety Code requirements for preparation of a Hazardous Materials Business Plan. Construction of the Proposed Project will not require the use of hazardous materials.

Hydrology and Water Quality

The Proposed Project has sufficient setbacks such that any grading will not alter the existing drainage pattern or the course of a stream. Erosion control measures and best management practices have been identified in the Site Management Plan which will protect water quality. The project proponent is enrolling in the State Water Board's Waste Discharge Requirements for Cannabis Cultivation Order WQ 2017-00XX-DWQ. Ongoing compliance with this Order will ensure that cultivation operations will not significantly impact water resources by using a combination of Best Management Practices (BMPs), buffer zones, sediment and erosion controls, inspections and reporting, and regulatory oversight. Surface runoff is not expected to change significantly after project implementation because only a very small part of the parcel will contain impervious surfaces. The Proposed Project would not involve construction of housing or other structures that could be located in a floodplain or impede or redirect flood flows, or otherwise generate substantial hazards related to flooding. Other portions of the Parcel are in a flood zone. With the various Proposed Program measures and compliance with other regulatory requirements that protect hydrology and water quality, the Proposed Project would not significantly affect hydrology or water quality.

Noise

Construction of the Proposed Project would be of short duration (several days), so noise impacts would not be significant.

Public Services

Construction of the Proposed Project would not require any public services.

Transportation and Traffic

Construction of the Proposed Project would be of short duration (several days), so traffic impacts would not be significant.

Utilities and Service Systems

Construction of the Proposed Project would not require any new utilities.

Mitigation

None required.

CONCLUSIONS

The environmental factors checked below would be potentially affected by the proposed activity, involving at least one new or substantially more severe significant impact that was not covered in the certified CalCannabis Cultivation Licensing Program PEIR (State Clearinghouse #2016082077) as indicated by the checklists on the preceding pages.

- | | | |
|---|---|--|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture & Forestry Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy Use / Greenhouse Gas Emissions |
| <input type="checkbox"/> Geology / Soils | <input type="checkbox"/> Hazards / Hazardous Materials / Human Health | <input type="checkbox"/> Hydrology / Water Quality |
| <input type="checkbox"/> Land Use / Planning | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Noise |
| <input type="checkbox"/> Population / Housing | <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Transportation / Traffic | <input type="checkbox"/> Tribal Cultural Resources | <input type="checkbox"/> Utilities / Service Systems |
| <input type="checkbox"/> Cumulative Impacts | | |

This Tiering Checklist documents the extent to which the PEIR addresses the impacts of the applicant's project. The Proposed Project is consistent with the activities described and evaluated in the PEIR. The Proposed Project does not have the potential for any new impacts or more significant impacts than disclosed in the PEIR. Thus, no additional CEQA compliance steps are required.

DETERMINATION

(To be completed by the Lead Agency) On the basis of this initial evaluation:

- ☐ I find that the proposed activity falls within the scope of the PEIR and/or other CEQA documentation, and no further environmental documentation is needed.
- ☐ I find that the proposed activity is not entirely within the scope of the PEIR and/or other CEQA documentation, but could not have a significant effect on the environment, and an ADDENDUM will be prepared.
- ☐ I find that although the proposed activity could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed activity MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

(name and title)
California Department of Food and Agriculture

Date

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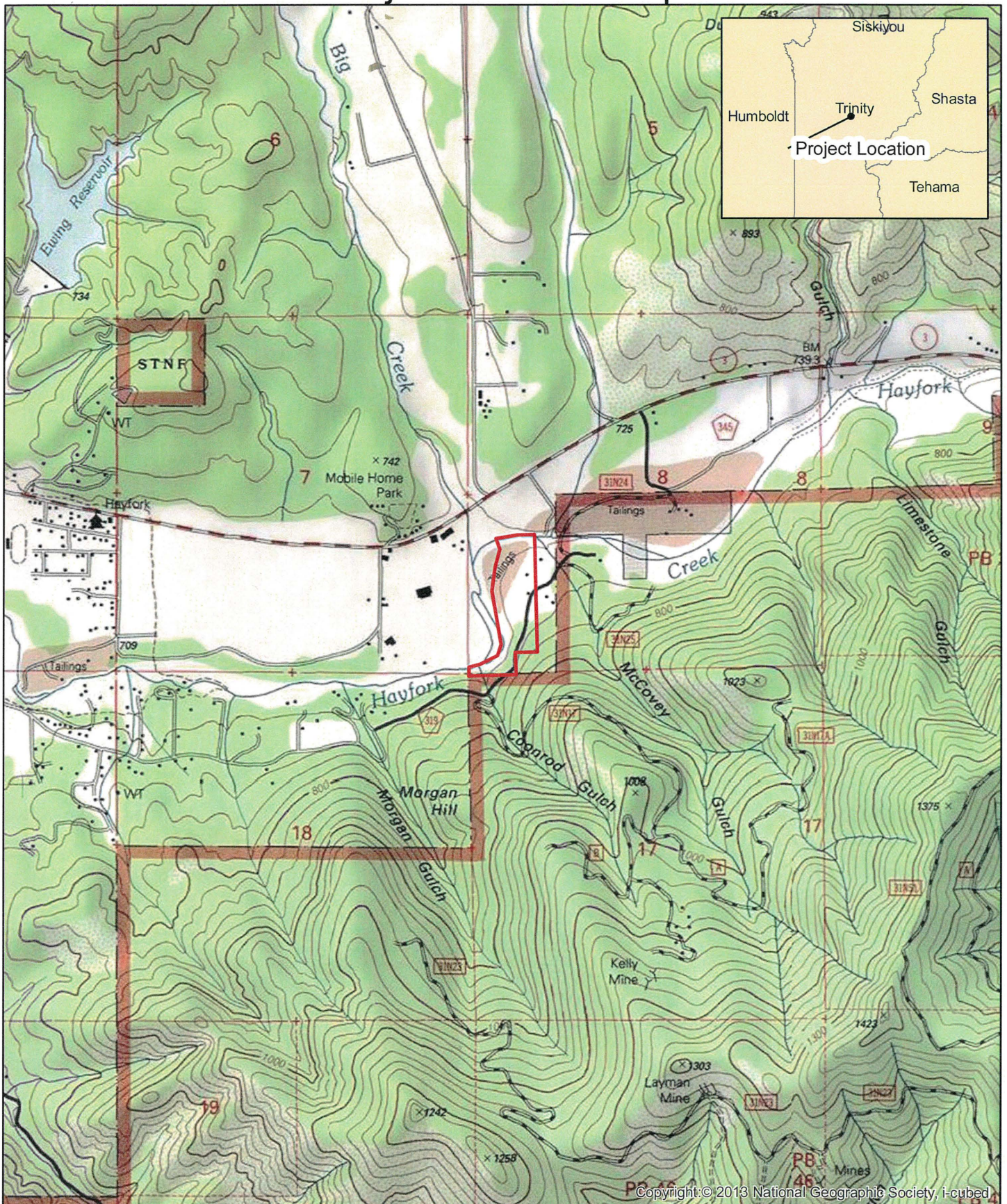
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EXHIBITS

Project Location Map



Project Location

0

0.5

1

Kilometers

0

0.5

1

Miles

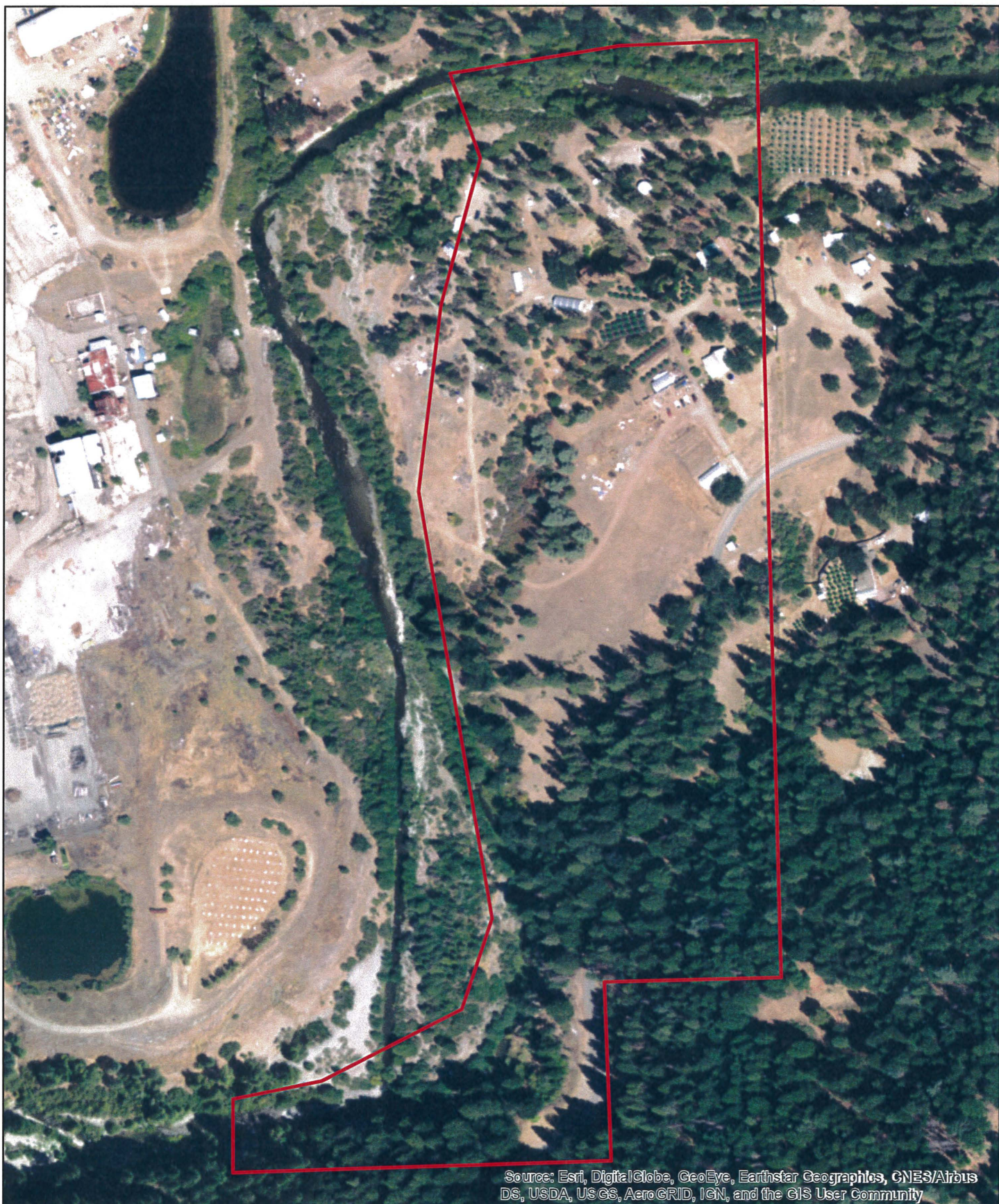


1:24,000

3001 Morgan Hill Rd
Figure 1 - Project Location



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Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



Project Location

0

75

150

Meters

0

350

700

Feet



1:3,000

3001 Morgan Hill Rd
Field Map



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INVESTIGATIONS
COMPANY

Map Date 12/12/2017

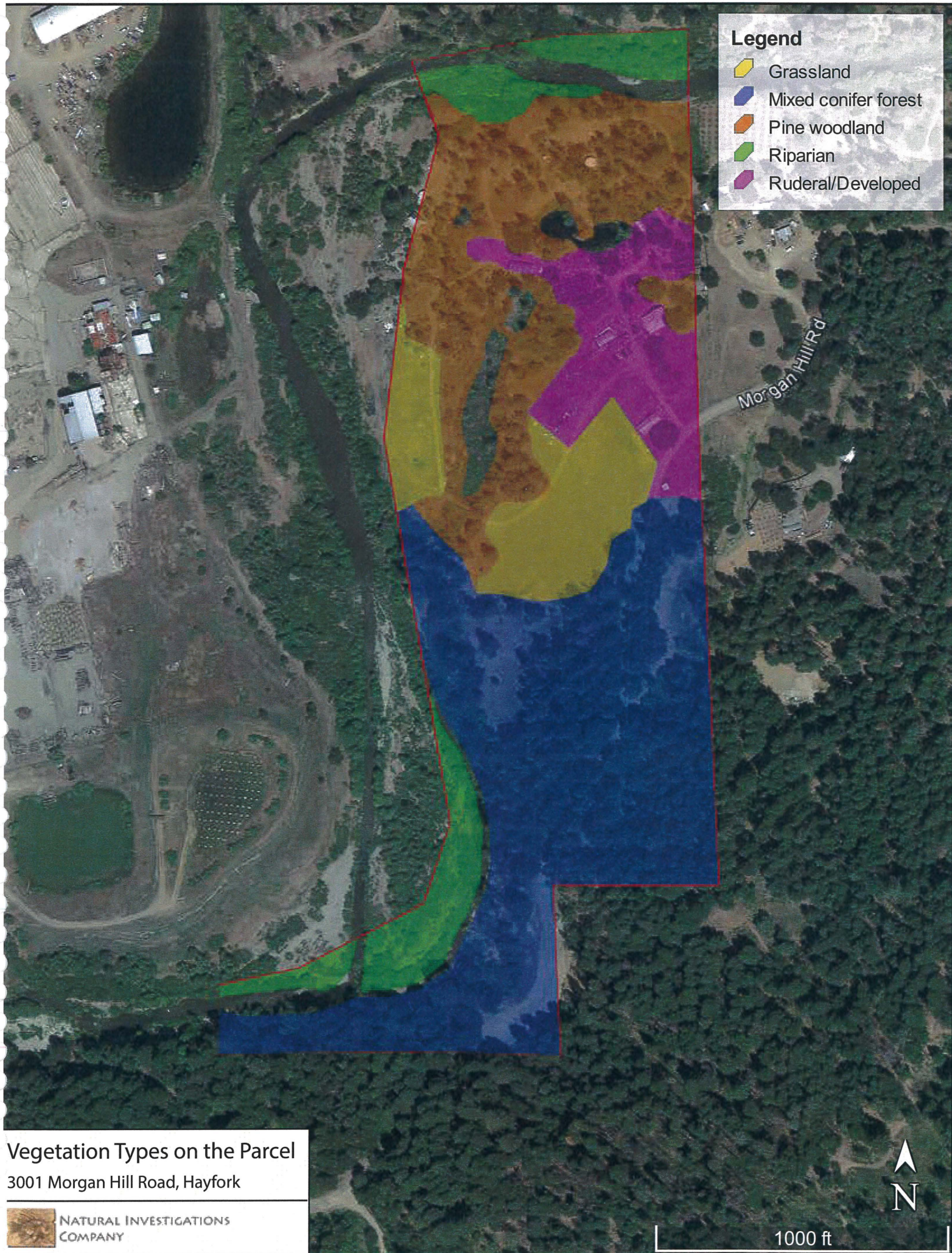
Hayfork 1998 Quadrangle: Township 31N, Range 11W, Section 8,17



Facility Layout Diagram
3001 Morgan Hill Road, Hayfork



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Vegetation Types on the Parcel

3001 Morgan Hill Road, Hayfork

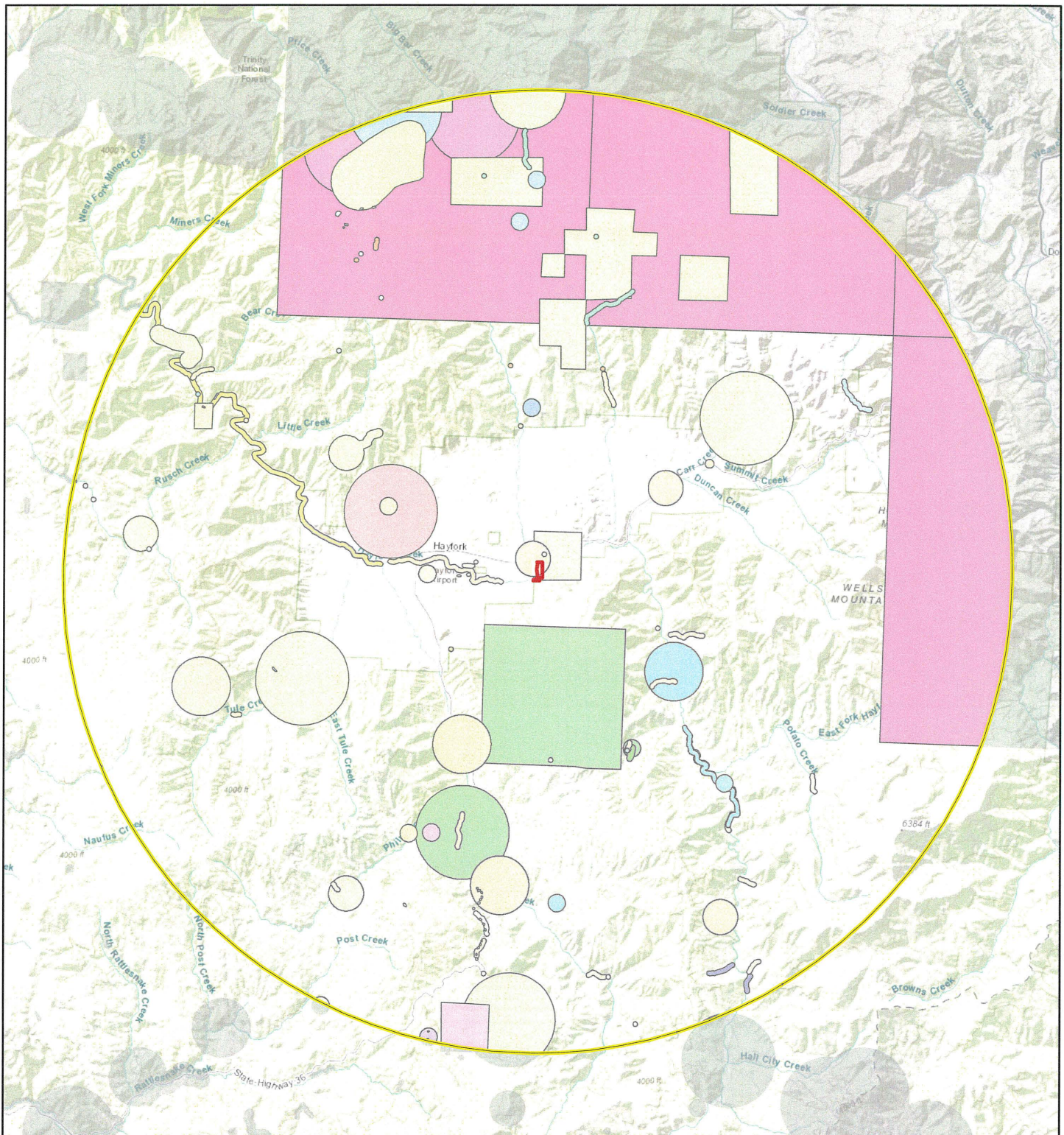


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COMPANY



1000 ft





Project Location 10 Mile Buffer

1:190,000 1 inch = 3 miles

0 3 6 Miles



Notes:

1. The locations of all features shown are approximate.
2. This drawing is for information purposes. It is intended to assist in showing features discussed in an attached document. Natural Investigations Company can not guarantee the accuracy and content of electronic files. The master file is stored by Natural Investigations Company and will serve as the official record of this communication.
3. It is unlawful to copy or reproduce all or any part thereof, whether for personal use or resale, without permission. Data Sources: California Department of Fish and Wildlife. 2017. RareFind 5.x, California Natural Diversity Data Base. Biogeographic Data Branch, Sacramento, California. (updated monthly by subscription service)

Special-Status Species Occurrences Map

3001 Morgan Hill Rd

Hayfork 1998 Quadrangle:
Township 31N, Range 11W, Section 8, 17



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Hayfork Cannabis - Trinity County, Annual

3.3 Site Preparation - 2019**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.0000e-005	4.0000e-005	3.6000e-004	0.0000	3.0000e-005	0.0000	3.0000e-005	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0352	0.0352	0.0000	0.0000	0.0353
Total	4.0000e-005	4.0000e-005	3.6000e-004	0.0000	3.0000e-005	0.0000	3.0000e-005	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0352	0.0352	0.0000	0.0000	0.0353

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					2.7000e-004	0.0000	2.7000e-004	3.0000e-005	0.0000	3.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.6000e-004	4.4600e-003	2.0700e-003	0.0000		1.8000e-004	1.8000e-004		1.7000e-004	1.7000e-004	0.0000	0.4378	0.4378	1.4000e-004	0.0000	0.4413
Total	3.6000e-004	4.4600e-003	2.0700e-003	0.0000	2.7000e-004	1.8000e-004	4.5000e-004	3.0000e-005	1.7000e-004	2.0000e-004	0.0000	0.4378	0.4378	1.4000e-004	0.0000	0.4413

Hayfork Cannabis - Trinity County, Annual

3.3 Site Preparation - 2019**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.0000e-005	4.0000e-005	3.6000e-004	0.0000	3.0000e-005	0.0000	3.0000e-005	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0352	0.0352	0.0000	0.0000	0.0353
Total	4.0000e-005	4.0000e-005	3.6000e-004	0.0000	3.0000e-005	0.0000	3.0000e-005	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0352	0.0352	0.0000	0.0000	0.0353

3.4 Grading - 2019**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					1.0200e-003	0.0000	1.0200e-003	4.4000e-004	0.0000	4.4000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	9.5000e-004	8.6000e-003	7.6900e-003	1.0000e-005		5.4000e-004	5.4000e-004		5.1000e-004	5.1000e-004	0.0000	1.0520	1.0520	2.0000e-004	0.0000	1.0570
Total	9.5000e-004	8.6000e-003	7.6900e-003	1.0000e-005	1.0200e-003	5.4000e-004	1.5600e-003	4.4000e-004	5.1000e-004	9.5000e-004	0.0000	1.0520	1.0520	2.0000e-004	0.0000	1.0570

Hayfork Cannabis - Trinity County, Annual

3.4 Grading - 2019**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.6000e-004	1.6000e-004	1.4500e-003	0.0000	1.2000e-004	0.0000	1.2000e-004	3.0000e-005	0.0000	3.0000e-005	0.0000	0.1409	0.1409	2.0000e-005	0.0000	0.1413
Total	1.6000e-004	1.6000e-004	1.4500e-003	0.0000	1.2000e-004	0.0000	1.2000e-004	3.0000e-005	0.0000	3.0000e-005	0.0000	0.1409	0.1409	2.0000e-005	0.0000	0.1413

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					1.0200e-003	0.0000	1.0200e-003	4.4000e-004	0.0000	4.4000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	9.5000e-004	8.6000e-003	7.6900e-003	1.0000e-005		5.4000e-004	5.4000e-004		5.1000e-004	5.1000e-004	0.0000	1.0520	1.0520	2.0000e-004	0.0000	1.0570
Total	9.5000e-004	8.6000e-003	7.6900e-003	1.0000e-005	1.0200e-003	5.4000e-004	1.5600e-003	4.4000e-004	5.1000e-004	9.5000e-004	0.0000	1.0520	1.0520	2.0000e-004	0.0000	1.0570

Hayfork Cannabis - Trinity County, Annual

3.4 Grading - 2019**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.6000e-004	1.6000e-004	1.4500e-003	0.0000	1.2000e-004	0.0000	1.2000e-004	3.0000e-005	0.0000	3.0000e-005	0.0000	0.1409	0.1409	2.0000e-005	0.0000	0.1413
Total	1.6000e-004	1.6000e-004	1.4500e-003	0.0000	1.2000e-004	0.0000	1.2000e-004	3.0000e-005	0.0000	3.0000e-005	0.0000	0.1409	0.1409	2.0000e-005	0.0000	0.1413

3.5 Building Construction - 2019**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	9.6000e-004	9.8200e-003	7.5400e-003	1.0000e-005		6.1000e-004	6.1000e-004		5.6000e-004	5.6000e-004	0.0000	1.0230	1.0230	3.2000e-004	0.0000	1.0311
Total	9.6000e-004	9.8200e-003	7.5400e-003	1.0000e-005		6.1000e-004	6.1000e-004		5.6000e-004	5.6000e-004	0.0000	1.0230	1.0230	3.2000e-004	0.0000	1.0311

Hayfork Cannabis - Trinity County, Annual

3.5 Building Construction - 2019**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	1.0000e-005	1.3000e-004	5.0000e-005	0.0000	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0256	0.0256	0.0000	0.0000	0.0257
Worker	2.0000e-005	2.0000e-005	1.5000e-004	0.0000	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0141	0.0141	0.0000	0.0000	0.0141
Total	3.0000e-005	1.5000e-004	2.0000e-004	0.0000	2.0000e-005	0.0000	2.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0397	0.0397	0.0000	0.0000	0.0398

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	9.6000e-004	9.8200e-003	7.5400e-003	1.0000e-005		6.1000e-004	6.1000e-004		5.6000e-004	5.6000e-004	0.0000	1.0230	1.0230	3.2000e-004	0.0000	1.0311
Total	9.6000e-004	9.8200e-003	7.5400e-003	1.0000e-005		6.1000e-004	6.1000e-004		5.6000e-004	5.6000e-004	0.0000	1.0230	1.0230	3.2000e-004	0.0000	1.0311

Hayfork Cannabis - Trinity County, Annual

3.5 Building Construction - 2019**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	1.0000e-005	1.3000e-004	5.0000e-005	0.0000	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0256	0.0256	0.0000	0.0000	0.0257
Worker	2.0000e-005	2.0000e-005	1.5000e-004	0.0000	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0141	0.0141	0.0000	0.0000	0.0141
Total	3.0000e-005	1.5000e-004	2.0000e-004	0.0000	2.0000e-005	0.0000	2.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0397	0.0397	0.0000	0.0000	0.0398

3.6 Paving - 2019**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	8.3000e-004	7.8400e-003	7.1500e-003	1.0000e-005		4.4000e-004	4.4000e-004		4.1000e-004	4.1000e-004	0.0000	0.9573	0.9573	2.7000e-004	0.0000	0.9641
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	8.3000e-004	7.8400e-003	7.1500e-003	1.0000e-005		4.4000e-004	4.4000e-004		4.1000e-004	4.1000e-004	0.0000	0.9573	0.9573	2.7000e-004	0.0000	0.9641

Hayfork Cannabis - Trinity County, Annual

3.6 Paving - 2019**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.9000e-004	2.8000e-004	2.6200e-003	0.0000	2.2000e-004	0.0000	2.2000e-004	6.0000e-005	0.0000	6.0000e-005	0.0000	0.2537	0.2537	3.0000e-005	0.0000	0.2544
Total	2.9000e-004	2.8000e-004	2.6200e-003	0.0000	2.2000e-004	0.0000	2.2000e-004	6.0000e-005	0.0000	6.0000e-005	0.0000	0.2537	0.2537	3.0000e-005	0.0000	0.2544

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	8.3000e-004	7.8400e-003	7.1500e-003	1.0000e-005		4.4000e-004	4.4000e-004		4.1000e-004	4.1000e-004	0.0000	0.9572	0.9572	2.7000e-004	0.0000	0.9641
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	8.3000e-004	7.8400e-003	7.1500e-003	1.0000e-005		4.4000e-004	4.4000e-004		4.1000e-004	4.1000e-004	0.0000	0.9572	0.9572	2.7000e-004	0.0000	0.9641

Hayfork Cannabis - Trinity County, Annual

3.6 Paving - 2019**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.9000e-004	2.8000e-004	2.6200e-003	0.0000	2.2000e-004	0.0000	2.2000e-004	6.0000e-005	0.0000	6.0000e-005	0.0000	0.2537	0.2537	3.0000e-005	0.0000	0.2544
Total	2.9000e-004	2.8000e-004	2.6200e-003	0.0000	2.2000e-004	0.0000	2.2000e-004	6.0000e-005	0.0000	6.0000e-005	0.0000	0.2537	0.2537	3.0000e-005	0.0000	0.2544

3.7 Architectural Coating - 2019**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.0371					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.3000e-004	9.2000e-004	9.2000e-004	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005	0.0000	0.1277	0.1277	1.0000e-005	0.0000	0.1279
Total	0.0372	9.2000e-004	9.2000e-004	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005	0.0000	0.1277	0.1277	1.0000e-005	0.0000	0.1279

Hayfork Cannabis - Trinity County, Annual

3.7 Architectural Coating - 2019**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.0371					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.3000e-004	9.2000e-004	9.2000e-004	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005	0.0000	0.1277	0.1277	1.0000e-005	0.0000	0.1279
Total	0.0372	9.2000e-004	9.2000e-004	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005	0.0000	0.1277	0.1277	1.0000e-005	0.0000	0.1279

Hayfork Cannabis - Trinity County, Annual

3.7 Architectural Coating - 2019**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

4.0 Operational Detail - Mobile**4.1 Mitigation Measures Mobile**

Hayfork Cannabis - Trinity County, Annual

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0164	0.1031	0.2097	4.5000e-004	0.0241	7.1000e-004	0.0248	6.5000e-003	6.7000e-004	7.1600e-003	0.0000	41.2147	41.2147	4.1000e-003	0.0000	41.3171
Unmitigated	0.0164	0.1031	0.2097	4.5000e-004	0.0241	7.1000e-004	0.0248	6.5000e-003	6.7000e-004	7.1600e-003	0.0000	41.2147	41.2147	4.1000e-003	0.0000	41.3171

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
General Light Industry	22.30	4.22	2.18	65,083	65,083
Total	22.30	4.22	2.18	65,083	65,083

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
General Light Industry	14.70	6.60	6.60	59.00	28.00	13.00	92	5	3

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
General Light Industry	0.451973	0.050647	0.189842	0.133998	0.047952	0.007097	0.008090	0.098523	0.001594	0.001657	0.005958	0.001048	0.001621

5.0 Energy Detail

Historical Energy Use: N

Hayfork Cannabis - Trinity County, Annual

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	3.9843	3.9843	1.8000e-004	4.0000e-005	3.9999
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	3.9843	3.9843	1.8000e-004	4.0000e-005	3.9999
NaturalGas Mitigated	6.0000e-005	5.5000e-004	4.6000e-004	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.5994	0.5994	1.0000e-005	1.0000e-005	0.6029
NaturalGas Unmitigated	6.0000e-005	5.5000e-004	4.6000e-004	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.5994	0.5994	1.0000e-005	1.0000e-005	0.6029

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
General Light Industry	11232	6.0000e-005	5.5000e-004	4.6000e-004	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.5994	0.5994	1.0000e-005	1.0000e-005	0.6029
Total		6.0000e-005	5.5000e-004	4.6000e-004	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.5994	0.5994	1.0000e-005	1.0000e-005	0.6029

Hayfork Cannabis - Trinity County, Annual

5.2 Energy by Land Use - NaturalGas**Mitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
General Light Industry	11232	6.0000e-005	5.5000e-004	4.6000e-004	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.5994	0.5994	1.0000e-005	1.0000e-005	0.6029
Total		6.0000e-005	5.5000e-004	4.6000e-004	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.5994	0.5994	1.0000e-005	1.0000e-005	0.6029

5.3 Energy by Land Use - Electricity**Unmitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
General Light Industry	13696	3.9843	1.8000e-004	4.0000e-005	3.9999
Total		3.9843	1.8000e-004	4.0000e-005	3.9999

Hayfork Cannabis - Trinity County, Annual

5.3 Energy by Land Use - Electricity**Mitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
General Light Industry	13696	3.9843	1.8000e-004	4.0000e-005	3.9999
Total		3.9843	1.8000e-004	4.0000e-005	3.9999

6.0 Area Detail**6.1 Mitigation Measures Area**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0162	0.0000	3.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	6.0000e-005	6.0000e-005	0.0000	0.0000	6.0000e-005
Unmitigated	0.0162	0.0000	3.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	6.0000e-005	6.0000e-005	0.0000	0.0000	6.0000e-005

Hayfork Cannabis - Trinity County, Annual

6.2 Area by SubCategory**Unmitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	3.7100e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0125					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0000	0.0000	3.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	6.0000e-005	6.0000e-005	0.0000	0.0000	6.0000e-005
Total	0.0162	0.0000	3.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	6.0000e-005	6.0000e-005	0.0000	0.0000	6.0000e-005

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	3.7100e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0125					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0000	0.0000	3.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	6.0000e-005	6.0000e-005	0.0000	0.0000	6.0000e-005
Total	0.0162	0.0000	3.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	6.0000e-005	6.0000e-005	0.0000	0.0000	6.0000e-005

7.0 Water Detail

Hayfork Cannabis - Trinity County, Annual

7.1 Mitigation Measures Water

Apply Water Conservation Strategy

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	1.1197	0.0193	4.6000e-004	1.7413
Unmitigated	1.3996	0.0242	5.8000e-004	2.1767

7.2 Water by Land Use**Unmitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
General Light Industry	0.74 / 0	1.3996	0.0242	5.8000e-004	2.1767
Total		1.3996	0.0242	5.8000e-004	2.1767

Hayfork Cannabis - Trinity County, Annual

7.2 Water by Land Use**Mitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
General Light Industry	0.592 / 0	1.1197	0.0193	4.6000e-004	1.7413
Total		1.1197	0.0193	4.6000e-004	1.7413

8.0 Waste Detail

8.1 Mitigation Measures Waste

Institute Recycling and Composting Services

Hayfork Cannabis - Trinity County, Annual

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	0.2015	0.0119	0.0000	0.4991
Unmitigated	0.8059	0.0476	0.0000	1.9965

8.2 Waste by Land Use**Unmitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
General Light Industry	3.97	0.8059	0.0476	0.0000	1.9965
Total		0.8059	0.0476	0.0000	1.9965

Hayfork Cannabis - Trinity County, Annual

8.2 Waste by Land Use**Mitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
General Light Industry	0.9925	0.2015	0.0119	0.0000	0.4991
Total		0.2015	0.0119	0.0000	0.4991

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
----------------	--------	-----------	-----------	-------------	-------------	-----------

10.0 Stationary Equipment**Fire Pumps and Emergency Generators**

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
----------------	--------	-----------	------------	-------------	-------------	-----------

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
----------------	--------	----------------	-----------------	---------------	-----------

User Defined Equipment

Equipment Type	Number
----------------	--------

11.0 Vegetation

Hayfork Cannabis - Trinity County, Annual

APPENDIX D
BASE FLOOD ELEVATION

APPENDIX B
ONSITE WASTEWATER DISPOSAL APPROVALS



Trinity County Division of Environmental Health
P.O. Box 476 • 61 Airport RD • Weaverville, CA 96093

(530) 623-1459

Fees: ☒ \$695.00 New **CASH**
☐ \$219.00 Repair
Permit # SP **2019-010**
Receipt # **EN2019-00109**
Date **2/28/2019**

☐ **Application for an Onsite Sewage Disposal System Permit:**

APN: **017-430-049**

Applicant's Name: **Daniel Davadian**

Mailing Address: **1483 Garden Brook**

City: **McKinleyville**

State: **CA** Zip: **95571**

Phone: **530 784 3062**

Physical Address: **3001 Morgan Hill Rd.**

City: **Hayfork**

Detailed Directions to site (required): **HWY 5 to OAL ST LEFT TURN**

RIGHT TURN MORGAN Hill 1.7 miles property on left

Lot Size: **30.00 ac** No. of Bedrooms: **3** No. Baths: **2** Water Source: **Well**

☒ **Proposed Septic Meets Minimum Setback Requirements:**

Well/Spring 100'

Stream/Creek high water mark 100'

Wetlands/lakes/vernal pools/ponds high water mark 200'

Unstable land mass 100'

Property lines/structures 5'

*Not allowed on slopes greater than 25%, in fill, or packed materials

☒ **Detailed site map attached** — **emailed PDF**

☒ **Perc Tests attached**

☒ **Contractor or Owner-Builder Form attached**

☐ **Permit has been checked for errors and is signed**

If conditions under which this permit was issued should change, including changes in surrounding parcels, making the placement or design of the system in violation of the local, state or federal regulations, this permit will become invalid. Any significant grading, cutting, or filling of soil, prior to final approval, may invalidate this permit. Insure equal distribution to each leach line. Install leach lines on the contour. This permit is good for 1 year from the approval date. If your permit expires it is your responsibility to get it renewed.

☒ **Signature:** (Property Owner or Licensed Contractor)

Contractor's Lic#

Date: **2-28-19**

Official Use Only

Effective: **02/28/2019** Expiration: **02/28/20**

Tank size required (minimum gallons): ☐ 750 gal. ☒ 1000 gal. ☒ 1200 gal. ☐ 1500 gal.

Soil/Percolation Data: **120 mPT, Rocky Clay loam**

Leach Trench: Total Length: **300'** Width: **36"** Depth: **10'** Minimum distance between lines:

Leach gravel over: **6" unless ex flow** Leach gravel under: **6" unless ex flow**

Approved chamber system (make/model): **E2 flow preferred — or**
4" perforated pipe w/ leach gravel 12" 6" in depth

APPROVED BY: DATE: **03/18/19**

FINAL INSPECTION BY:

DATE:

Notes/As-Built information:



Trinity County Division of Environmental Health
P.O. Box 476 • 61 Airport RD • Weaverville, CA 96093

(530) 623-1459

Fees: ☒ \$695.00 New **CASH**
☐ \$219.00 Repair
Permit # SP2019-011
Receipt # EN2019-00112
Date 03/06/2019

Application for an Onsite Sewage Disposal System Permit:

APN: 017-430-49

Applicant's Name: Daniel Davardian

Mailing Address: 1483 GARDEN Brook ST

City: McKinleyville State: CA Zip: 95519

Phone: 530-784-3962

Physical Address: 3001 MORRAN Hill Rd City: HAYFORK

Detailed Directions to site (required): HWY 35 to Hayfork, L turn on

OAK, L turn on to MORRAN Hill, proceed to end of Road, property on

Lot Size: 30-00 Ac. No. of Bedrooms: _____ No. Baths: _____ Water Source: Well

property on
left.

Proposed Septic Meets Minimum Setback Requirements:

Well/Spring	100'
Stream/Creek high water mark	100'
Wetlands/lakes/vernal pools/ponds high water mark	200'
Unstable land mass	100'
Property lines/structures	5'

40 employees
between 2
systems

*Not allowed on slopes greater than 25%, in fill, or packed materials

Detailed site map attached

Perc Tests attached

Contractor or Owner-Builder Form attached

Permit has been checked for errors and is signed

If conditions under which this permit was issued should change, including changes in surrounding parcels, making the placement or design of the system in violation of the local, state or federal regulations, this permit will become invalid. Any significant grading, cutting, or filling of soil, prior to final approval, may invalidate this permit. Insure equal distribution to each leach line. Install leach lines on the contour. This permit is good for 1 year from the approval date. If your permit expires it is your responsibility to get it renewed.

Signature: Dan Davardian

(Property Owner or Licensed Contractor)

Contractor's Lic# _____

Date: 3.6.2019

Official Use Only

Effective: 03/06/19 Expiration: 03/06/20

Tank size required (minimum gallons): ☐ 750 gal. ☐ 1000 gal. ☒ 1200 gal. ☐ 1500 gal.

Soil/Percolation Data: 120 mPT Rocky clay loam

Leach Trench: Total Length: 300' Width: 36" Depth: _____ Minimum distance between lines: _____

Leach gravel over: 6" rock 1/2" Leach gravel under: 6"

Approved chamber system (make/model): E2 flow preferred or

4" perforated pipe w/ 6" of gravel below/above

APPROVED BY: [Signature] DATE: 03/18/19

FINAL INSPECTION BY: _____

DATE: _____

Notes/As-Built information: _____

APPENDIX C

CALEEMOD RESULTS

Hayfork Cannabis - Trinity County, Annual

Hayfork Cannabis
Trinity County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Light Industry	3.20	1000sqft	0.07	3,200.00	0

1.2 Other Project Characteristics

Urbanization	Rural	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	88
Climate Zone	1			Operational Year	2020
Utility Company	Pacific Gas & Electric Company				
CO2 Intensity (lb/MW hr)	641.35	CH4 Intensity (lb/MW hr)	0.029	N2O Intensity (lb/MW hr)	0.006

1.3 User Entered Comments & Non-Default Data

- Project Characteristics -
- Land Use -
- Construction Phase - No demolition work. Installation of buildings.
- Grading - Limited grading.
- Construction Off-road Equipment Mitigation -
- Water Mitigation -
- Waste Mitigation -

Hayfork Cannabis - Trinity County, Annual

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	5.00	1.00
tblConstructionPhase	NumDays	100.00	2.00
tblConstructionPhase	NumDays	10.00	0.00
tblConstructionPhase	NumDays	5.00	2.00
tblConstructionPhase	PhaseEndDate	9/18/2019	4/10/2019
tblConstructionPhase	PhaseEndDate	9/4/2019	4/5/2019
tblConstructionPhase	PhaseEndDate	4/12/2019	3/31/2019
tblConstructionPhase	PhaseEndDate	4/17/2019	4/3/2019
tblConstructionPhase	PhaseEndDate	9/11/2019	4/9/2019
tblConstructionPhase	PhaseEndDate	4/15/2019	4/1/2019
tblConstructionPhase	PhaseStartDate	9/12/2019	4/10/2019
tblConstructionPhase	PhaseStartDate	4/18/2019	4/4/2019
tblConstructionPhase	PhaseStartDate	4/16/2019	4/2/2019
tblConstructionPhase	PhaseStartDate	9/5/2019	4/8/2019
tblConstructionPhase	PhaseStartDate	4/13/2019	4/1/2019
tblGrading	AcresOfGrading	0.00	0.50
tblProjectCharacteristics	UrbanizationLevel	Urban	Rural

2.0 Emissions Summary

Hayfork Cannabis - Trinity County, Annual

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2019	0.0408	0.0323	0.0300	5.0000e-005	1.6700e-003	1.8400e-003	3.5100e-003	5.7000e-004	1.7200e-003	2.2900e-003	0.0000	4.0672	4.0672	1.0000e-003	0.0000	4.0922
Maximum	0.0408	0.0323	0.0300	5.0000e-005	1.6700e-003	1.8400e-003	3.5100e-003	5.7000e-004	1.7200e-003	2.2900e-003	0.0000	4.0672	4.0672	1.0000e-003	0.0000	4.0922

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2019	0.0408	0.0323	0.0300	5.0000e-005	1.6700e-003	1.8400e-003	3.5100e-003	5.7000e-004	1.7200e-003	2.2900e-003	0.0000	4.0672	4.0672	1.0000e-003	0.0000	4.0922
Maximum	0.0408	0.0323	0.0300	5.0000e-005	1.6700e-003	1.8400e-003	3.5100e-003	5.7000e-004	1.7200e-003	2.2900e-003	0.0000	4.0672	4.0672	1.0000e-003	0.0000	4.0922

[illegible]

Hayfork Cannabis - Trinity County, Annual

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	4-1-2019	6-30-2019	0.0521	0.0521
		Highest	0.0521	0.0521

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.0162	0.0000	3.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	6.0000e-005	6.0000e-005	0.0000	0.0000	6.0000e-005
Energy	6.0000e-005	5.5000e-004	4.6000e-004	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	4.5837	4.5837	1.9000e-004	5.0000e-005	4.6029
Mobile	0.0164	0.1031	0.2097	4.5000e-004	0.0241	7.1000e-004	0.0248	6.5000e-003	6.7000e-004	7.1600e-003	0.0000	41.2147	41.2147	4.1000e-003	0.0000	41.3171
Waste						0.0000	0.0000		0.0000	0.0000	0.8059	0.0000	0.8059	0.0476	0.0000	1.9965
Water						0.0000	0.0000		0.0000	0.0000	0.2348	1.1649	1.3996	0.0242	5.8000e-004	2.1767
Total	0.0326	0.1036	0.2102	4.5000e-004	0.0241	7.5000e-004	0.0249	6.5000e-003	7.1000e-004	7.2000e-003	1.0406	46.9633	48.0039	0.0761	6.3000e-004	50.0933

Hayfork Cannabis - Trinity County, Annual

2.2 Overall Operational**Mitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.0162	0.0000	3.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	6.0000e-005	6.0000e-005	0.0000	0.0000	6.0000e-005
Energy	6.0000e-005	5.5000e-004	4.6000e-004	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	4.5837	4.5837	1.9000e-004	5.0000e-005	4.6029
Mobile	0.0164	0.1031	0.2097	4.5000e-004	0.0241	7.1000e-004	0.0248	6.5000e-003	6.7000e-004	7.1600e-003	0.0000	41.2147	41.2147	4.1000e-003	0.0000	41.3171
Waste						0.0000	0.0000		0.0000	0.0000	0.2015	0.0000	0.2015	0.0119	0.0000	0.4991
Water						0.0000	0.0000		0.0000	0.0000	0.1878	0.9319	1.1197	0.0193	4.6000e-004	1.7413
Total	0.0326	0.1036	0.2102	4.5000e-004	0.0241	7.5000e-004	0.0249	6.5000e-003	7.1000e-004	7.2000e-003	0.3893	46.7303	47.1196	0.0355	5.1000e-004	48.1605

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	62.59	0.50	1.84	53.31	19.05	3.86

3.0 Construction Detail**Construction Phase**

Hayfork Cannabis - Trinity County, Annual

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	4/1/2019	3/31/2019	5	0	
2	Site Preparation	Site Preparation	4/1/2019	4/1/2019	5	1	
3	Grading	Grading	4/2/2019	4/3/2019	5	2	
4	Building Construction	Building Construction	4/4/2019	4/5/2019	5	2	
5	Paving	Paving	4/8/2019	4/9/2019	5	2	
6	Architectural Coating	Architectural Coating	4/10/2019	4/10/2019	5	1	

Acres of Grading (Site Preparation Phase): 0.5

Acres of Grading (Grading Phase): 0.5

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 4,800; Non-Residential Outdoor: 1,600; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Hayfork Cannabis - Trinity County, Annual

3.2 Demolition - 2019

Unmitigated Construction Off-Site

[illegible]

Mitigated Construction On-Site

[illegible]

Hayfork Cannabis - Trinity County, Annual

3.2 Demolition - 2019**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

3.3 Site Preparation - 2019**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					2.7000e-004	0.0000	2.7000e-004	3.0000e-005	0.0000	3.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.6000e-004	4.4600e-003	2.0700e-003	0.0000		1.8000e-004	1.8000e-004		1.7000e-004	1.7000e-004	0.0000	0.4378	0.4378	1.4000e-004	0.0000	0.4413
Total	3.6000e-004	4.4600e-003	2.0700e-003	0.0000	2.7000e-004	1.8000e-004	4.5000e-004	3.0000e-005	1.7000e-004	2.0000e-004	0.0000	0.4378	0.4378	1.4000e-004	0.0000	0.4413

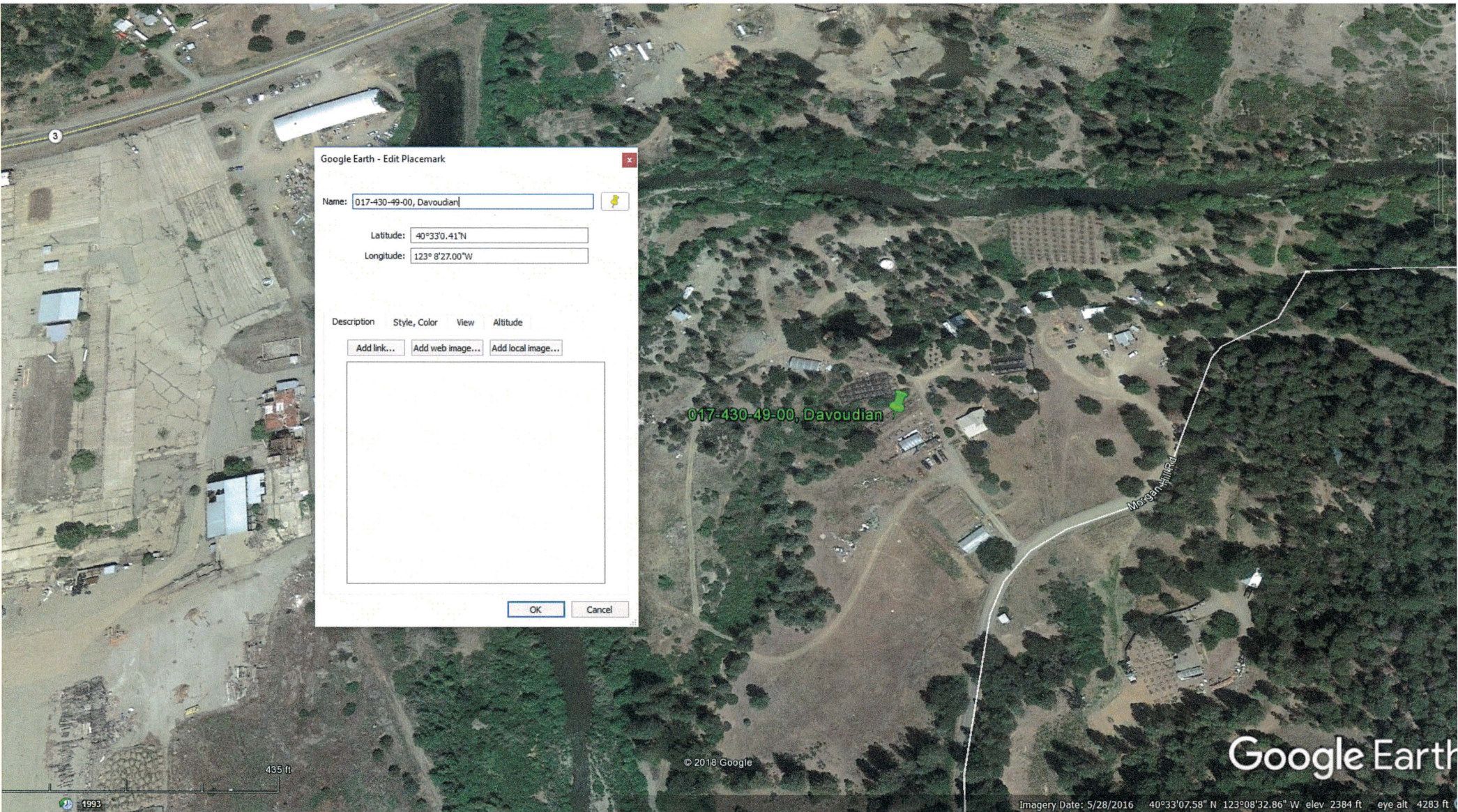
Subject: Davoudian septic in relation to floodplain
Date: Tuesday, March 12, 2019 at 3:24:46 PM Pacific Daylight Time
From: Leslie Hubbard
To: Bruce Grove, 'Charlie Simpson'
CC: Kristalynne Anderson, Bethany Prince
Attachments: Davoudian floodplain with coordinates.jpg

Hi Bruce and Charlie,

FYI: Attached, please find a Google Image showing that the lat and long identified on Davoudian's elevation certificate put the location about 15' above the BFE. The coordinates on the elevation certificate were taken at the location proposed for greenhouses that have since been built. Now, the coordinates are within a few feet of proposed septic installation. I'm cc'ing Kristy Anderson with Environmental Health to let her know that the proposed locations of septic installation are well above the Base Flood Elevation.

Leslie J. Hubbard

Deputy Director of Planning
Trinity County Planning Department
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Weaverville, CA 96093
Office: (530) 623-1351 ext 3
lhubbard@trinitycounty.org



Google Earth - Edit Placemark

Name:

Latitude:

Longitude:

Description Style, Color View Altitude

APPENDIX E
TRINITY COUNTY WATER WORKS
SERVICE AREA

