



COUNTY OF LAKE
 COMMUNITY DEVELOPMENT DEPARTMENT
 Planning Division
 Courthouse - 255 N. Forbes Street
 Lakeport, California 95453
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July 23, 2025
 Revised July 27, 2025

CALIFORNIA ENVIRONMENTAL QUALITY ACT ENVIRONMENTAL CHECKLIST FORM INITIAL STUDY (IS 23-19)

- | | |
|----------------------------------|--|
| 1. Project Title: | Wellness Ranch 3 / Wellness Ranch, LLC (Luis Martinez) |
| 2. Permit Numbers: | Major Use Permit PL-25-59 (UP 23-08)
Subsequent Initial Study (IS 23-19) |
| 3. Lead Agency Name and Address: | County of Lake Community Development Department
255 North Forbes Street
Lakeport, CA 95453 |
| 4. Contact Person: | Mary Claybon, Senior Planner |
| 5. Project Location(s): | 6751 Ridge Road, Lakeport, CA
(APN 007-045-16) |
| 6. Project Name & Address: | Wellness Ranch 3
10522 Poinsettia Lane
Santa Fe Springs, CA 90670 |
| 7. General Plan Designation: | Rural Lands |
| 8. Zoning: | "RL-B5-WW" Rural Lands, Special Lot Size/Density
(min. 5 acres), Waterway Combining District |
| 9. Supervisor District: | District 4 |
| 10. Flood Zone: | "D"; Areas in which flood hazards are undetermined,
but possible |
| 11. Slope: | Varied; cultivation sites are less than 20% |
| 12. Fire Hazard Severity Zone: | SRA; High Fire Risk |
| 13. Earthquake Fault Zone: | None |
| 14. Dam Failure Inundation Area: | Not located within Dam Failure Inundation Area |
| 15. Parcel Size: | ±106.47 Acres |
| 16. Previous Land Use Permits: | MUP 19-15 (10,000 sf outdoor canopy area)
MUP 22-11 (additional 10,000 sf outdoor canopy area,
and 2,400 sf indoor canopy) |

17. Description of Project:

The Wellness Ranch cannabis cultivation operation is located on a 106.5-acre parcel (APN: 007-045-16) at 6751 Ridge Road, Lakeport. The County has previously issued two Minor Use Permits (MUP 19-15 and MUP 22-11) for cannabis cultivation operations. This application represents an amendment to use permit for Wellness Ranch for an expansion of cannabis canopy with facilities, and combination of the two previously issued permits. The site has been approved for the following (as of April of 2024):

- Cultivation site 1 – existing 10,000 square foot fenced/gated outdoor garden
- Cultivation site 2 – existing 10,000 square foot fenced/gated outdoor garden
- Cultivation site 3 – existing 2,400 square foot indoor garden within barn
- Residence - one existing single-family dwelling
- Various existing farm storage, processing, and service facilities, including four existing wells and water storage tanks, a hoop house for immature plants, three 40' drying containers, one 40' storage container, one 8'x12' Pesticide/fertilizer storage shed, an ADA accessible toilet, security cameras/equipment, on site vehicle circulation and parking areas, trash storage bins, green waste composting/soil storage areas.

A Major Use Permit application PL-25-59 (UP 23-08) for the purpose of expanding the cannabis cultivation area/facilities and combining the existing, approved sites under one major use permit was submitted in October of 2023 (updated in April and October of 2024 and March of 2025). The proposed Wellness Ranch 3 cannabis cultivation project is depicted on updated site plans prepared by Gregory Engineering, Inc.(March 2025) in Figure 1.

The applicant has modified the project scope to reduce the proposed outdoor canopy by an acre and increase the request for proposed indoor canopy from 2,400 square feet (sf) to 8,820 sf. Below is the summary of existing cultivation sites and newly proposed cultivation activities:

1) Total Outdoor Canopy, upon approval of PL-25-59 (UP 23-08):

- a. 10,000 sf at Site 1 (approved); no changes proposed
- b. 97,120 sf at Site 2 (10,000 sf approved); 87,120 sf expansion proposed

2) Total Indoor Canopy, upon approval of PL-25-59 (UP 23-08):

- a. Within the existing 2,400 sf barn, the canopy is proposed in two tiers consisting of 4,320 sf canopy within a 4,800 sf cultivation area; with 2,400 sf indoor canopy previously approved
- b. Within the proposed 2,500 sf barn, the canopy is proposed in two tiers consisting of 4,500 sf

TABLE 1, TOTAL APPROVED AND PROPOSED CULTIVATION

Garden	Approved	Proposed	Total
Cultivation Site 1, outdoor	10,000 sf	0 sf	10,000 sf
Cultivation Site 2, outdoor	10,000 sf	87,120 sf	97,120 sf
Cultivation Site 3, existing barn indoor	2,400 sf	1,920 sf	4,320 sf

Cultivation Site 4, proposed barn indoor	0 sf	4,500 sf		4,500 sf
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At buildout, the Wellness Ranch 3 project includes 107,120 sf outdoor canopy (20,000 sf approved and 87,120 sf proposed) and 8,820 sf of indoor canopy (2,400 sf approved and 6,420 sf proposed). All outdoor cultivation will be conducted in fabric bags and/or in tilled/amended native soil and the indoor cultivation will be on two tier racks, in containers, utilizing only artificial lighting.

Ground water from four existing wells will be pumped into twelve (12) 5,000-gallon water tanks above Cultivation site 2, one (1) 5,000-gallon water tank at the house and four (4) 2,500-gallon water tanks at Cultivation site 1. Drip irrigation systems will be used to water plants. A fertilizer mixing tank will be set up at each garden site to deliver liquid fertilizer such as compost tea to the plants. Cannabis drying and storage/processing will take place on site within storage containers that will be replaced with a comparable sized processing building in the second stage of development with construction of the facility estimated at year three of operations.

Access to the property is provided from Ridge Road via two 13'-15' wide existing driveways, with one serving the house, the indoor cultivation facilities, and Cultivation site 1. The other driveway serves the cultivation site 2 facilities. The driveways have a road base/gravel surface and turnouts in compliance with Public Resource Code (PRC) 4290/4291 regulations.

Proposed Stage I facilities include:

- Expansion of Garden 2
- 2,500 sf barn for indoor cultivation
- Eleven 5,000-gal water tanks
- Two 8'x12' Pesticide/fertilizer storage sheds
- A small solar-powered electrical system to power low voltage items such as security cameras, and water pumps for drawing groundwater and mixing liquid fertilizers into the irrigation systems
- Three additional 40' long shipping containers added to the existing four shipping containers, for a total of seven shipping containers for temporary cannabis processing accordance with Lake County Ordinance 3135; not to exceed three years of use

Proposed Stage II facilities include:

- Construction of 25' tall pre-engineered 2,500 sf ADA compliant processing facility to replace the seven shipping containers. This new processing building will be equipped with roof mount solar
- One additional steel, fiberglass, or concrete tank dedicated to fire suppression in alignment with PRC 4290/4291 regulations.

Construction Timeframe

No grading and no major construction-related activities are needed for Stage I of development which includes installation of perimeter fencing around the new outdoor cultivation area. According to the Property Management Plan, a few persons working for a few days will be needed for site preparation and perimeter fence installation, and such low numbers of man-hours would not generate significant vehicle emissions. During Stage II of development, between two to three months of construction time is anticipated to build the proposed 2,500 sf processing facility.

Construction Equipment

The following equipment is expected to be used to construct the project facilities:

- Excavator (tracks)
- Backhoe or skid loader (tires)
- Pickup trucks (tires)
- Water truck (tires)

The following are existing (pre-construction) control measures within the project site:

- Vegetated drainage swales and the use of fiber rolls (straw wattles)
- Sufficient buffer distances between cultivation areas and drainages
- Armoring of driveways and roads with gravel, road base, or asphalt
- Side ditches and pipe culverts under roads
- Preservation of existing vegetation

Other project details:

- Outdoor cultivation will be conducted in fabric bags and/or tilled native soil with amendments
- Indoor cultivation will be in pots/containers under artificial lighting
- Drip irrigation system with water supplied via four existing groundwater wells
- Water storage within in twelve 5,000-gallon, four 2,500-gallon, and four existing 2,500-gallon water tanks at the project site
- Waterproof storage shed/Conex container or similar for storage of chemicals and hand tools
- Electricity will be supplied by PG&E service and small photovoltaic solar array for low voltage equipment
- Parking and portable restrooms equipped with hand washing stations will be provided
- Trash enclosures will be provided on-site for refuse
- Generators will be utilized during emergencies and power outages only
- Processing of on-site grown cannabis will occur within the temporary processing shipping containers in alignment with Lake County Board of Supervisors Ordinance No. 3135 for a duration of up to three years. The construction of the permanent processing facility will begin with Stage II of development. The processing building will be a comparable size and in the same location as the shipping containers.

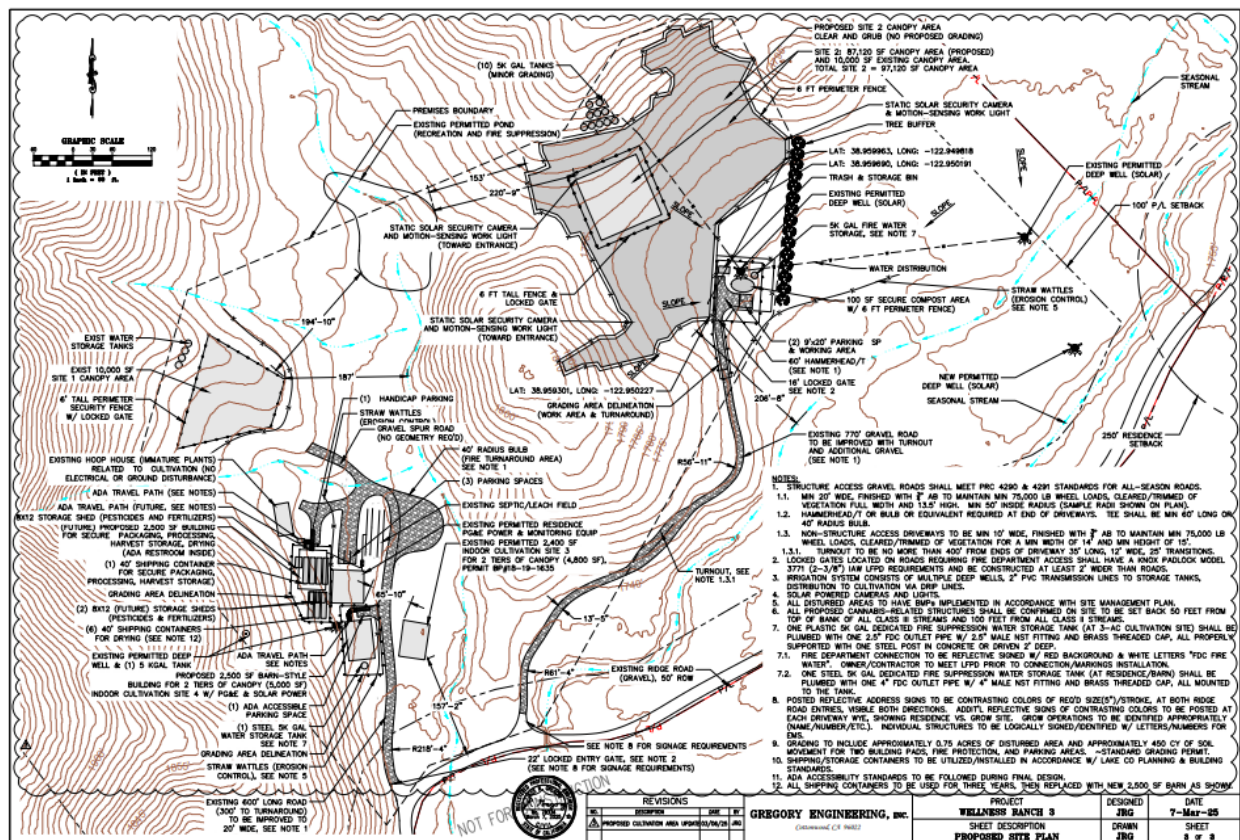
Vehicle Trips During Construction

Construction duration for Stage II of development is anticipated for three months, Monday through Saturday. Up to three employees are proposed. The County estimates that six daily trips (two arriving, two departing) will result from three employees for a total of approximately 432 total employee trips, in addition to up to 14 delivery trips during construction, for a total of 446 trips during construction.

Operational Details

The proposed project is anticipated to operate from 8:00 a.m. to 7:00 p.m., Monday through Sunday with flexibility to operate under traditional agricultural hours specific to planting and harvesting activities. The estimated maximum number of employees during peak planting and harvest season is four employees. Vehicle trips per day are expected to be up to eight trips. The County anticipates that up to two deliveries per week on average will occur during operations. The applicant is proposing four parking spaces including one (1) ADA parking space (the project site is flat at the cultivation site and has ample room for additional non-designated parking).

FIGURE 1 –SITE PLAN



Source: Gregory Engineering March 2025

Water Analysis

A Hydrology Report and Drought Management Plan was prepared by Northpoint Consulting Group, Inc. in April of 2024 for the project. The Hydrology Report includes the approximate amount of water available for the project's proposed total use. The identified water source, the recharge rate, impacts of water use to surrounding area, and a Drought Management Plan (DMP) indicating how the applicant proposes to reduce water use during a declared drought emergency are contained within the report. A Water Demand Technical Memorandum was prepared by NorthPoint Consulting Group, LLC dated March 5, 2025 in addition to the report. The purpose of this Memorandum is to provide an update to the hydrological analysis for the change in scope for the canopy areas. Demand is estimated utilizing the same methodology.

Water Source

The Hydrology Report (Report) evaluated four existing wells. The wells range in depth from 160 ft to 300 ft and have a combined yield of about 38 gpm (61.3 acre-feet/year or AFY). Well #1 will be used to source water for the existing residence, nearby 10,000 sf outdoor cannabis canopy and 5,000 sf indoor canopy. This area is identified in the Report as Area 1. Production tests were conducted on wells 2, 3 and 4. Wells 2, 3, and 4 will be used to source water for the existing 10,000 sf outdoor canopy and expansion of the outdoor canopy. This area is identified in the Report as Area 2.

FIGURE 2 – WELLS ESTIMATED YIELDS AND RECHARGE RATES

Table 1. Summary of project well information (WCRs in Appendix B).

Well #	Year Drilled	Depth (ft)	Yield (gpm)		Yield (AFY)	
			WCR	Pump Test	WCR	Pump Test
1	2018	300	10	n/a	16.1	n/a
2	2021	280	8	6	12.9	9.7
3	2023	300	12	8	19.4	12.9
4	2023	160	17	14	27.4	22.6

Table 2. Summary well production test results (Results in Appendix C).

Well	Static Water Level (ft bgs)		Test		Recovery	
	WCR	Pump Test	Duration (hrs)	Water Level at End of Test (ft bgs)	# hrs After End of Test	Water Level (ft bgs)
1	100	n/a	--	--	--	--
2	0	0	5	191	1.5	121.2
3	40	7.6	3.6	70	0.4	22.9
4	20	11.9	2.3	35.1	0.2	21.1

Source: Northpoint Consulting, April 2024

Projected Water Demand

Records of water use (provided by the applicant) were recorded during the 2021, 2022, and 2023 cultivation seasons. These records were used to estimate the water demand for the proposed cultivation activities.

During 2021, a total of 122,215 gallons of water was used over 129 days. The canopy during 2021 was 10,000 sf, equating to approximately 0.095 gallons per day (gpd) per sf of canopy.

During 2022, a total of 103,190 gallons of water were used over 147 days. The canopy during 2022 was 10,000 sf, equating to approximately 0.07 gpd per sf of canopy. Less water was used in 2022 due to improved irrigation and water conservation measures, as well as late season rainfall.

During 2023, a total of 75,150 gallons of water were used over 147 days. The cultivation canopy during 2023 was 10,000 sf, equating to approximately 0.05 gpd per sf of canopy. The lower demand in 2023 was attributed to favorable weather conditions, improved irrigation methods, and addressing plant disease. The maximum daily demand was recorded as 2,500 gallons (0.25 gpd per sf of canopy).

Actual demand at Wellness Ranch, averaged over the three years of record, averages to 0.072 gpd/ sf or 3,137 gpd per acre of canopy. The estimated demand is an average over the cultivation period which is lower during seedling/vegetative states and higher during the flowering period. Using the 2022 monthly demand distribution to estimate the distribution of demand for the outdoor cultivation, and assuming indoor demand remains constant year-round, the total monthly demand is summarized in Table 3. The total revised projected annual demand, including residential demand, is approximately 1,498,572 gallons or 4.6 acre-feet, which is an overall reduction of water demand of 370,161 gallons (~1.1 acre-feet). According to the EPA (<https://www.epa.gov/watersense/our-water>), the average residential demand is 300 gpd. The total project water demand including the on-site residence is estimated to be approximately 5.73 acre-feet annually.

FIGURE 3 – WATER DEMAND

Revised Project Water Demand

Table 1. Estimated annual residential and irrigation demand in Area 1 – Well #1 Source.

Source	# days	Annual Demand (gallons)	Annual Demand (acre-feet)	Change from April 2024 Report
Residence	365	109,500	0.34	No Change
10,000 sf Outdoor	150	108,030	0.33	No Change
8,820 sf Indoor	365	231,854	0.71	Increase
Total		449,384	1.38	+100,417 gallons (0.31 acre-feet)

Table 2. Estimated annual irrigation demand in Area 2 – Well #2, #3, and #4 Source.

Source	# days	Annual Demand (gallons)	Annual Demand (acre-feet)	Change from April 2024 Report
97,120 SF (2.23 Acre) Outdoor	150	1,049,188	3.22	Decrease by 470,578 gallons (1.44 acre-feet)

Table 3. Estimated projected monthly water use (1,000 gallons).

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Area 1	29	26	29	28	29	45	58	55	52	40	28	29	449
Area 2	0	0	0	0	4	169	281	255	234	107	0	0	1,049
Total	29	26	29	28	33	215	338	310	287	147	28	29	1,499

Source: Northpoint Consulting, March 2025

Aquifer Data

The Memorandum does not estimate the aquifer storage capacity but does estimate the annual recharge rate during drought- and non-drought years. The Memorandum concludes that the recharge ranges from the 106.5-acre property is between 7.4 and 59 acre-feet during a drought year, and between 33.5 and 221.2 acre-feet during a non-drought year. Using a recharge value of 7.4 AFY to represent a drought year and 33.5

AFY to represent an average year, over the 106.4-acre parcel area, there is sufficient recharge to meet the project's irrigation demand, even during drought years.

The Report then evaluates the demand from other wells in the vicinity and concludes that this project will not adversely affect the neighboring wells that compete for the same underground water source as seen in Figure 4 below.

FIGURE 4 – ESTIMATED RADIUS OF INFLUENCE



Source: Northpoint Consulting, April 2024

On-Site Water Storage

The project proposes to use the existing groundwater well #1 to fill one 5,000-gallon water tank near the residence and four 2,500-gallon tanks near the western, 10,000 sf outdoor Cultivation site, for a total of 15,000 gallons of water storage for Area 1.

The project proposes to use wells #2, 3 and 4 to fill up eleven 5,000-gallon water tanks to be used for irrigation and one 5,000-gallon tank to be used for fire suppression, for a total 55,000 gallons of water storage for irrigation in Area 2.

Drought Management/Conservation Measures

To plan and prepare for drought conditions, the project will follow recommendations for monitoring, planning, and preparedness provided by the National Integrated Drought Information System. In addition to the above ongoing conservation measures, water metering, and reporting, during times of drought emergencies or water scarcity, the project

may implement the following additional measures, as needed or appropriate to the site, to reduce water use and ensure both success and decreased impacts to surrounding areas:

- Install additional water storage and/or implement a rainwater catchment system
- Install moisture meters to monitor how much water is in the soil at the root level and reduce watering to only what is needed to avoid excess
- Cover the soil and driplines with removable plastic covers or similar to reduce evaporation
- Irrigate only in the early morning hours or before sunset
- Cover plants with shaded meshes during peak summer heat to reduce plant water needs; and/or
- Use a growing medium that retains water in a way to conserve water and aid plant growth. Organic soil ingredients like peat moss, coco coir, compost and other substances like perlite and vermiculite retain water and provide a good environment for cannabis to grow.

In the event the well(s) cannot supply the water needed for the project, the following measures may be taken:

- Reduce the amount of cultivation and/or length of cultivation season
 - The amount of cultivation would be determined based on available water
 - Early crop harvest, if water becomes limited
- Install additional storage and/or implement a rainwater catchment system
- For indoor operations, recycle recaptured water from air conditioning and dehumidification units; and/or
- If possible, develop an alternative, legal, water source that meets the requirements of Lake County Codes and Ordinances in alignment with the California Regional Water Quality Control Board

Energy Usage

According to the Wellness Ranch 3 Energy Report, the total energy demand of a cannabis operation depends on the type of cultivation, location of the project, and the types of equipment required. Outdoor cultivation involves minimal equipment and has relatively low energy demands, while indoor cultivation involves more equipment that tends to have higher energy demands. Energy used in indoor grow operations include high-intensity lighting. The applicant uses and will continue to use on-grid power supplemented with solar photovoltaic facilities.

The site presently has a 200-amp service serving the on-site dwelling. The proposed Wellness Ranch indoor cultivation facilities will involve two barns. The indoor cultivation facilities will use a combination of power supplied by PG&E and on site solar-powered electrical systems. The proposed 2,500 sf barn-style building will likely require one additional 200-amp service that would use on-grid power. An alternative energy source such as a small solar-powered electrical system will be installed to power low voltage items such as security cameras, and water pumps for drawing groundwater and mixing liquid fertilizers into the irrigation systems at the outdoor cultivation gardens.

The Lake County Zoning Ordinance requires energy monitoring within the annual performance report, primarily for indoor or mixed light cultivation. Energy consumption would be monitored and metered with data stored. Energy consumption would be metered using Electric Meters (KWh Meters) for alternating current and DC meters that measure power in

ampere-hours. The meters are included in the controllers / inverters that are part of the solar power system

Solid Waste Management

Annual non-hazardous solid waste generated by project operations is estimated to be about 500 to 1,000 pounds per year. At least one solid waste bin will be located at each cultivation site and at any processing facility. Waste bins will consist of trash cans (20 or 35 gallon) with lids or roll-off dumpsters with lids. The locations of waste bins / containers are shown in the Maps section. These solid waste containers should not be used to dispose of Cannabis green waste.

Recyclables will be segregated from solid waste and stored in bins. At weekly intervals, staff should transfer them by truck in trash cans, with tight lids or plastic garbage bags and tarped loads and deposit them in an appropriate recycling facility. Recyclables such as scrap metal, glass, metal and plastic containers, can be conveniently unloaded at a recycling drop-off center (a Lake County Integrated Waste Management facility or private facility). Cardboard and newspaper may be recycled or mixed in with other composting materials.

Waste will be transported to an appropriate licensed facility by cultivation operation staff using personal vehicles or be hauled by a private waste-hauling contractor, such as Waste Management, Inc., or C & S Waste Solutions. The licensed waste-hauler that is used at this facility is Lake County Waste Solutions. The Lake County Integrated Waste Management facilities include the following:

- Eastlake Landfill, 16015 Davis Ave, Clearlake
- Lake County Waste Solutions Transfer Station and Recycling Center, 230 Soda Bay Road, Lakeport
- South Lake Refuse and Recycling Center, 16015 Davis Street, Clearlake
- Quackenbush Mountain Resource Recovery and Compost Facility, 16520 Davis Street, Clearlake

Wastewater Management

The site uses the existing septic system serving the house and portable ADA-compliant restrooms for the cannabis workers for Stage I of development. For Stage II, a new septic system is required for the processing facility with ADA compliant restroom facilities based on Lake County Environmental Health requirements.

Grading and Earthwork

According to Sheet 3 of the Site Plans prepared by Gregory Engineering, Inc., earthwork for the building pads, access improvements and parking areas is approximated to include 450 CY of soil within a 0.75 acre area. In accordance with Chapter 30, *Grading Ordinance*, of the Lake County Municipal Code, the project is anticipated to trigger the need for a Standard Grading Permit. Final Grading, and Stormwater and Erosion Plans will be submitted as a part of the Grading Permit.

Stormwater Management

A Stormwater Management Plan has been prepared by Gregory Engineering. The Plan identifies the method of stormwater containment in the cultivation area (straw wattles), which are typical for this type of cultivation activity. The cultivation area is set back more than 100 feet from all water courses on site. Setbacks from any surface water channel or above-ground

water storage facility is 100 feet or more as is required by Article 27.13(at) of the Lake County Code.

Best Management Practices (BMPs) from the Stormwater Management Plan will be deployed in a sequence to follow the progress of site preparation / tilling / cultivation. As the locations of soil disturbance change, erosion and sedimentation controls should be adjusted accordingly to control storm water runoff at the downgrade perimeter and drain inlets. BMPs from the Stormwater Management Plan that will be implemented include the following:

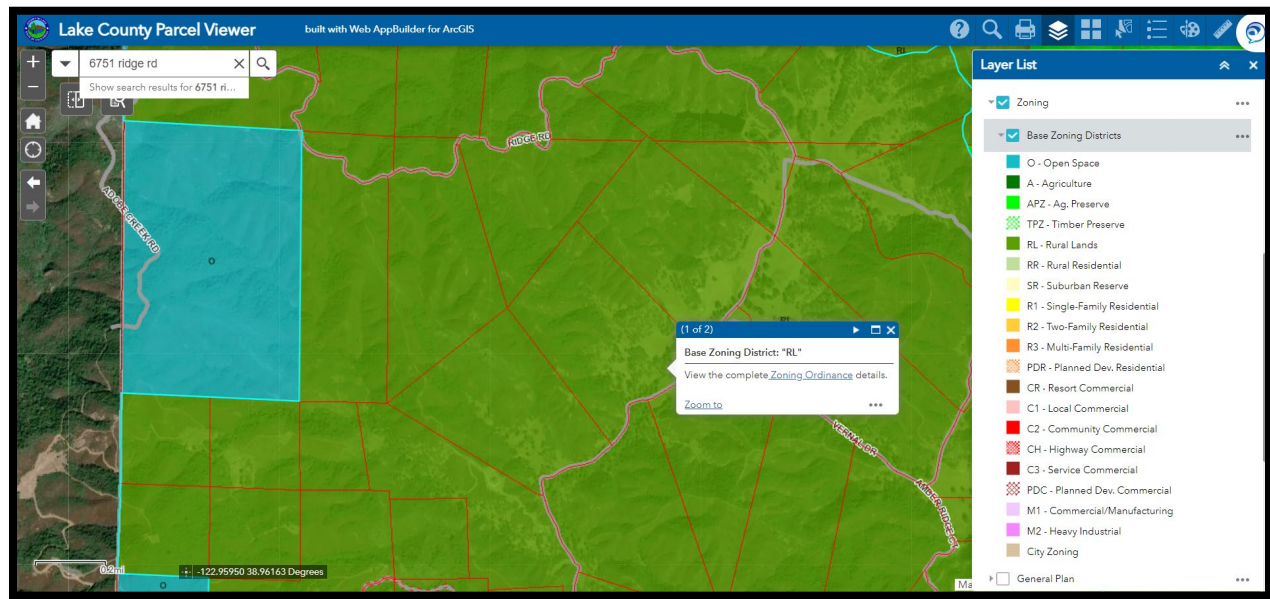
The site manager should monitor weather using National Weather Service reports (<https://www.weather.gov/>) to track conditions and alert crews to the onset of rainfall events. Disturbed soil areas should be stabilized with temporary erosion control or with permanent erosion control as soon as possible after grading or construction is complete. Disturbed areas will be stabilized with temporary or permanent erosion control before rain events. Disturbed areas that are substantially complete will be stabilized with permanent erosion control (soil stabilization) and vegetation (if within seeding window for seed establishment). Prior to forecasted storm events, temporary erosion control BMPs should be deployed and inspected. The project schedule should sequence earth-moving activities with the installation of both erosion control and sediment control measures. The schedule will be arranged as much as practicable to leave existing vegetation undisturbed until immediately prior to grading. Sufficient quantities of temporary sediment control materials will be maintained on-site throughout the duration of the project, to allow implementation of temporary sediment controls in the event of predicted rain, and for rapid response to failures or emergencies. This includes implementation requirements for active areas and non-active areas before the onset of rain.

In accordance with Chapter 30, Grading Ordinance, of the Lake County Municipal Code, the project is anticipated to trigger the need for a standard Grading Permit. Final Grading and Stormwater and Erosion Plans will be submitted as part of the grading permit.

18. Surrounding Land Uses and Setting:

- North, East, South and West: All properties surrounding the project property are zoned "RL" Rural Lands and are all roughly 100 or more acres in size and are undeveloped or sparsely populated. There are existing single family residences on isolated, rural parcels located to the northeast and southwest of the project area.

FIGURE 5 – VICINITY AND ZONING MAP OF SITE AND SURROUNDING LOTS



Source: Lake County GIS Mapping, 2023

19. Other public agencies whose approval is required (e.g., Permits, financing approval, or participation agreement).

The extent of this environmental review falls within the scope of the Lead Agency, the Lake County Community Development Department, and its review for compliance with the Lake County General Plan, the Kelseyville Area Plan, the Lake County Zoning Ordinance, and the Lake County Municipal Code. Other organizations in the review process for permitting purposes, financial approval, or participation agreement can include but are not limited to:

- Lake County Department of Environmental Health
- Lake County Air Quality Management District
- Lake County Department of Public Works
- Lake County Department of Public Services
- Lake County Agricultural Commissioner
- Lake County Sheriff's Office
- Lakeport Fire Protection District
- Department of Motor Vehicles
- Central Valley Regional Water Quality Control Board
- California Water Resources Control Board
- California Department of Food and Agriculture
- California Department of Pesticide Regulations
- California Department of Public Health
- California Department of Cannabis Control
- California Department of Consumer Affairs
- California Department of Fish & Wildlife (CDFW)
- California Department of Forestry & Fire Protection (CALFIRE)
- California Department of Transportation (Caltrans)

20. Have California Native American Tribes traditionally and culturally affiliated with the Project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is

there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and Project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process, per Public Resources Code §21080.3.2. Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3 (c) contains provisions specific to confidentiality.

A Cultural Resources Assessment with intensive pedestrian surveys of the Project site was prepared by Natural Investigations, Inc., and dated March 2020. No items of significance were identified under CEQA. Based on the findings of this assessment, there is no indication that the Project will impact any historical resources as defined under CEQA Section 15064.5, unique archaeological resources as defined under CEQA Section 21083.2(g), or tribal cultural resources as defined under Public Resources Code Section 21074. However, mitigation measures are proposed in the event of an unanticipated discovery. An inquiry to the California Historical Resources Information System (CHRIS) was sent on June 7, 2024, for the Project Property. CHRIS recommended the lead agency contact the local Native American tribe(s) regarding traditional, cultural, and religious heritage values.

Notification of the project and offering consultation under AB-52 was sent to Big Valley Rancheria, Cortina Rancheria, Elem Colony, Hopland Band of Pomo Indians, Koi Nation, Mishewal-Wappo, Middletown Rancheria, Redwood Valley Rancheria, Robinson Rancheria, Scotts Valley Band of Pomo Indians, Habematolel Pomo of Upper Lake Tribe, and Yocha Dehe Wintun Nation on December 1, 2023, and June 7, 2024, by the County of Lake. Of the notified Tribes, the Habematolel Pomo of Upper Lake Tribe and Yocha Dehe Wintun Nation both responded to the notice and deferred to Big Valley Band of Pomo Indians. The Community Development Department has not received an AB 52 Tribal Consultation request for this Project.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this Project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- | | | |
|---|---|--|
| ☒ Aesthetics | ☐ Greenhouse Gas Emissions | ☐ Public Services |
| ☐ Agriculture & Forestry Resources | ☒ Hazards & Hazardous Materials | ☐ Recreation |
| ☒ Air Quality | ☒ Hydrology / Water Quality | ☐ Transportation |
| ☒ Biological Resources | ☐ Land Use / Planning | ☒ Tribal Cultural Resources |
| ☒ Cultural Resources | ☐ Mineral Resources | ☐ Utilities / Service Systems |
| ☐ Energy | ☒ Noise | ☒ Wildfire |
| ☒ Geology / Soils | ☐ Population / Housing | ☒ Mandatory Findings of Significance |

DETERMINATION: (To be completed by the lead Agency)
On the basis of this 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.

Initial Study Prepared By:
Mary Claybon, Senior Planner

Mary Claybon
SIGNATURE

Date: July 23, 2025

Mireya G. Turner, Director
Community Development Department

SECTION 1

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 particular physical impact may occur, and 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 Section XVII, "Earlier Analyses," 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. Section 15063(c) (3) (D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis 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 Measures 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) This 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

I. AESTHETICS

Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
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Except as provided in Public Resource Code Section 21099, would the project:

- | | | | | |
|--|--------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| 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) 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) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? | ☐ | ☒ | ☐ | ☐ |

Discussion:

- a) The project site is accessed by Ridge Road an unmaintained county road. The Lake County General Plan (2008) identifies views of Mount Konocti, Clear Lake, and open, undeveloped lands along state highways and major local corridors as local scenic vistas. The Kelseyville Area Plan sites scenic resources including appropriate visual screening and roadway setbacks required for industrial and service commercial uses. The use of drought resistant and locally indigenous vegetation shall be promoted.

The project parcel is not in a locally designated scenic corridor. There are no scenic vistas on or adjacent to the subject site. The project site is located in a rural area surrounded by hilly topography with oak woodland and brush vegetation that serve as a natural screen. The cultivation areas are on a relatively flat portion of the site, on the lower slopes and at the bottom of the valley. Due to the rural nature of the site, and because it is visually protected by the natural topography and surrounding vegetation, the cultivation activities would not be highly visible from public roads. The project will need to have screening fencing around the perimeter of the cultivation area for security purposes. There is an additional vegetation screening (tree buffer) proposed east of garden 2 to provide screening between the cultivation area and the neighboring parcel. This additional tree planting will buffer the view from the neighboring parcel, and minimize light, glare, and potential air quality issues. The proposed structures and water tanks may be visible from neighboring properties and vehicles driving along the road, but the proposed activities and structures are agricultural in nature and are consistent with the existing use of the property.

Less than Significant Impact

- b) No unique scenic rock outcroppings or historic buildings exist on the Project Site. The site is also not located within a locally-designated scenic corridor or a state scenic highway. No tree removal is proposed for the project as development will occur on relatively flat portions of the site. There is no proposed construction activities that would include damages to rock outcroppings. In addition, the site is not located on or visible from a scenic highway.

No Impact

- c) The site is in a rural, unincorporated area of Lake County southwest of Lakeport and is situated in a manner that makes it difficult to be seen from Ridge Road due to vegetation and terrain. The project is consistent with the property Zoning and General Plan land use designations in the area. As further described above, the Proposed Project would not substantially degrade the existing visual character and/or quality of public views.

FIGURE 6 –ARIAL VIEW OF 6751 RIDGE RD.



Source: Google Earth 2024

Less Than Significant Impact

- d) The project has little potential to create additional light or glare. The existing 2,500 sf barn and the proposed 2,500 sf barn will be used for indoor cultivation. Exterior security lighting fixtures will be downcast and shielded. The outdoor cultivation areas will have security lighting, however the light fixtures to be used are downcast and comply with the outdoor lighting recommendations found in consistent with the Dark Sky Initiative darksky.org. The following mitigation measures will be implemented to reduce the impacts to less than significant:

Less Than Significant Impact with Mitigation measures AES-1 through AES-3 incorporated:

AES-1: All outdoor lighting shall be directed downward onto the Project site and not onto adjacent properties. All lighting equipment shall comply with the recommendations of www.darksky.org.

AES-2: All indoor lighting shall be fully contained within structures or otherwise shielded to fully contain any light or glare.

AES-3: Security lighting shall be motion activated and all outdoor lighting shall be shielded and downcast or otherwise positioned in a manner that will not shine light or allow light glare to exceed the boundaries of the lot of record upon which they are placed.

II. AGRICULTURE AND FORESTRY RESOURCES

Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
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Would the project:

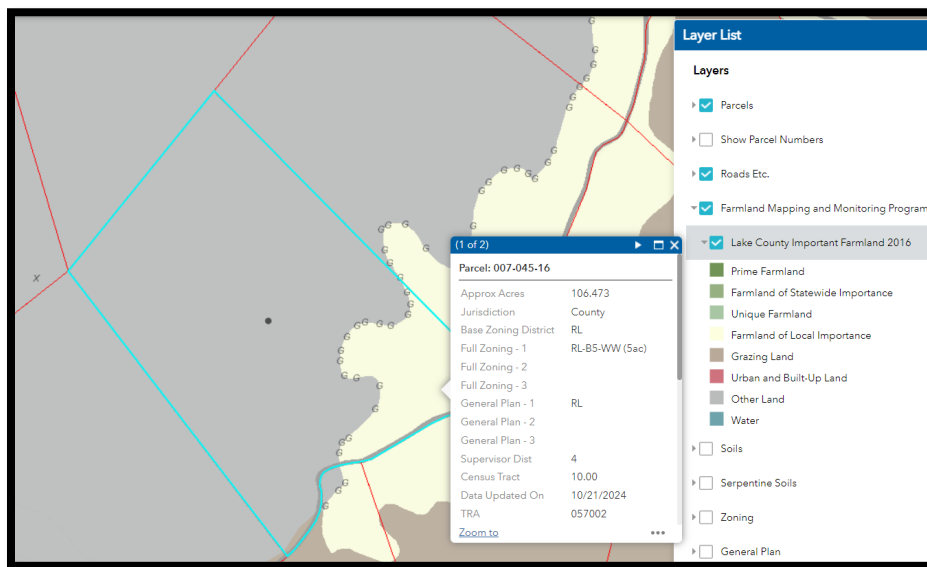
- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping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

Discussion:

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

- a) According to the County of Lake Farmland Mapping and Monitoring Program GIS mapping the proposed cultivation site is mapped as Other Land and is not regarded as being a significant source of mapped farmland of state or local importance or unique farmland. There is a portion of the site that is within the mapped Farmland of Local Importance however this area is not proposed for development. The site is not within a mapped Farmland Protection Zone.

FIGURE 7–CALIFORNIA FMMP DATA FOR LAKE COUNTY



Source: Lake County GIS portal

Less Than Significant Impact

- b) The site is not under a Williamson Act contract, nor are any of the neighboring properties. This project will have no effect on any Williamson Act properties.

No Impact

- c) The project site is zoned “RL” Rural Lands, and is not zoned for forestland or timberland, nor has it been used historically for timber production.

No Impact

- d) The project site does not contain land designated as forest lands and has not been used historically for timber production, and no tree removal is needed for this project, which will occupy a cleared area on site. Because no timber harvesting is proposed or needed, the proposed project has no potential to result in the loss of forest land or the conversion of forest land to non-forest use.

No Impact

- e) The project would not adversely affect neighboring lots or the subject parcel in a manner that would inhibit or prevent agricultural uses on site or on surrounding lots.

Less Than Significant Impact

III. AIR QUALITY

Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
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Would the project:

- | | | | | |
|--|--------------------------|-------------------------------------|-------------------------------------|--------------------------|
| a) Conflict with or obstruct implementation of the applicable air quality plan? | ☐ | ☐ | ☒ | ☐ |
| b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under and 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 or dust) adversely affecting a substantial number of people? | ☐ | ☒ | ☐ | ☐ |

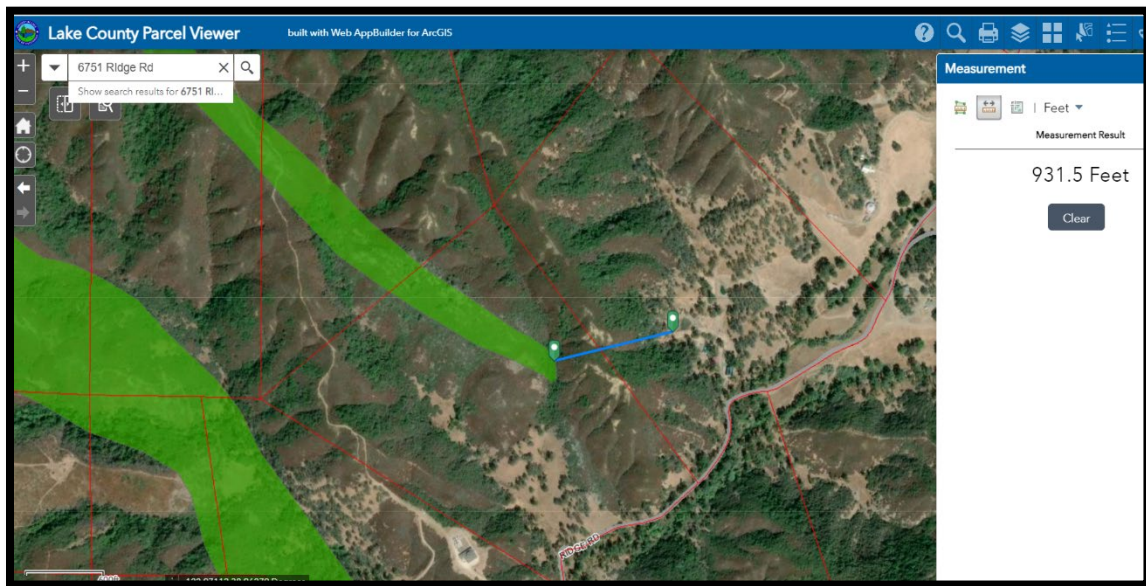
Discussion:

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.

- a) The project site is located within the Lake County Air Basin, which is under the jurisdiction of the Lake County Air Quality Management District (LCAQMD). The LCAQMD applies air pollution regulations to all major stationary pollution sources and monitors air quality. The Lake County Air Basin is in attainment with both state and federal air quality standards.

According to the USDA Soil Survey and the ultramafic, ultrabasic, serpentine rock and soils map of Lake County, serpentine soils have not been found within the project property. There is some mapped serpentine soil located on an adjacent lot, however the cultivation area is located over 930 feet from the pocket of serpentine soil on the adjacent parcel.

FIGURE 8 –CLOSEST MAPPED SERPENTINE SOILS ON ADJACENT PARCEL



Source: Lake County GIS Parcel

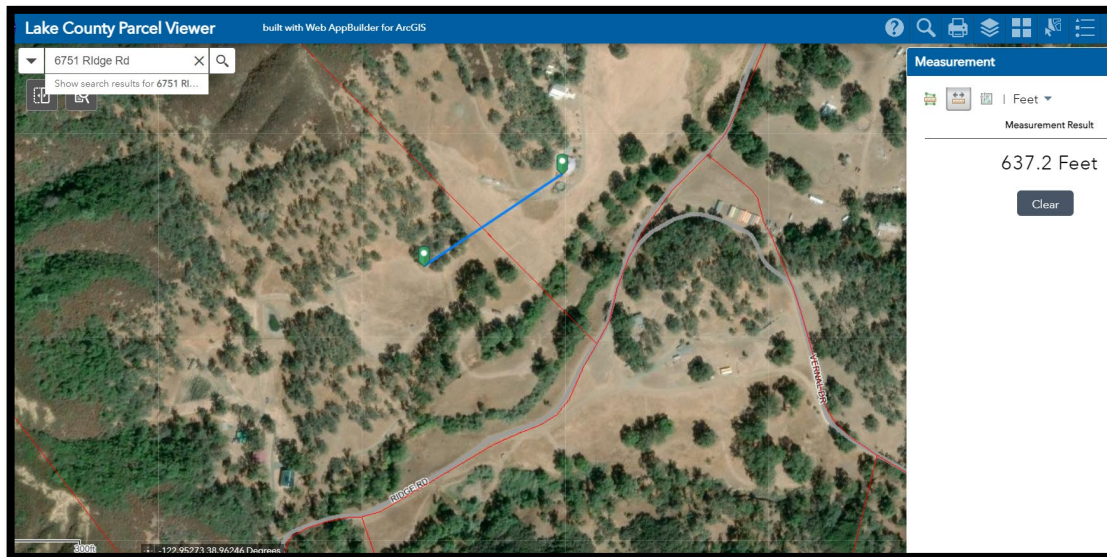
Due to the fact that the Lake County Air Basin is in attainment of both state and federal air quality standards, LCAQMD has not adopted an Air Quality Management Plan, but rather uses its Rules and Regulations to address air quality standards.

According to the Lake County Zoning Ordinance section on Commercial Cannabis Cultivation (§27.13), Air Quality must be addressed in the Property Management Plan. The intent of addressing this is to ensure that "all cannabis permittees shall not degrade the County's air quality as determined by the Lake County Air Quality Management District" and that "permittees shall identify any equipment or activity that may cause, or potentially cause the issuance of air contaminants including odor and shall identify measures to be taken to reduce, control or eliminate the issuance of air contaminants, including odors". This includes obtaining an Authority to Construct permit pursuant to LCAQMD Rules and Regulations.

The proposed project has the potential to result in short and long-term air quality impacts from construction and operations. Construction impacts, which are limited to grading, tilling the ground, building construction, and preparing soils for planting, would be temporary in nature and would occur over about a three (3) to six (6) month period. A grading permit will be obtained for approximately 450 cubic yards of earthwork for ground preparation of cultivation areas and building pad preparation. Ongoing field management is considered an operational, not construction, activity. The Project would not conflict with an applicable air quality plan.

Operational impacts would include dust and fumes from some vehicular traffic, including small delivery vehicles that would be contributors during operations. Odors from the outdoor cultivation activity are likely to be released, particularly during flowering season. Carbon air filtration systems are proposed to be installed inside the barns, which will help to minimize odors from escaping from the barns into the atmosphere. The outdoor cultivation areas are more difficult to mitigate odors. Such impacts are mitigated through the development and standards (setbacks, zoning, fencing, etc.) contained within Article 27. In this instance, the nearest off-site dwelling is located over 600 feet, exceeding the required 200-foot setback noted in Article 27.

FIGURE 9 –OUTDOOR CANOPY PROXIMITY TO CLOSEST OFFSITE DWELLING



Source: Lake County GIS portal

Less than Significant Impact

- b) The Project area is in the Lake County Air Basin, which is designated as in attainment for state and federal air quality standards for criteria pollutants (CO, SO₂, NO_x, O₃, PM₁₀, PM_{2.5}, VOC, ROG, Pb). Any Project with daily emissions that exceed any of the thresholds of significance for these criteria pollutants should be considered as having an individually and cumulatively significant impact on both a direct and cumulative basis.

An air quality impact assessment was performed for this project by Natural Investigations Co. (2019). Construction emissions and operational emissions were calculated using the California Emissions Estimator Model (CalEEMod)®, Version 2016.3.2 (California Air Pollution Control Officers Association, 2017). According to the Property Management Plan, the proposed expansion does not change any of the results significantly (Graening and Associates, 2023). As indicated by the Project's Air Quality Management Plan, near-term construction activities and long-term operational activities would not exceed any of the thresholds of significance for criteria pollutants. As stated in "a" above, Lake County has adopted Bay Area Air Quality Management District (BAAQMD) thresholds of significance as a basis for determining the significance of air quality and greenhouse gas impacts.

Less than Significant Impact

- c) Sensitive receptors (i.e., children, senior citizens, and acutely or chronically ill people) are more susceptible to the effects of air pollution than the general population. Land uses that are considered sensitive receptors typically include schools, playgrounds, childcare centers, hospitals, convalescent homes, and retirement homes. There are no schools, parks, childcare centers, convalescent homes, or retirement homes located within one mile of the project site. The nearest off-site dwelling is located over 600 feet from the outdoor canopy and proposed facilities. This is greater than the required 200-foot setback for offsite residences from commercial cannabis cultivation as described in Article 27.13 of the Lake County Zoning Ordinance.

Pesticide application will be used during the growing season and as described in the Property Management Plan, will be applied carefully to individual plants. The outdoor cultivation area will be surrounded by a fence. The project does not propose demolition or renovation of older structures that could potentially contain asbestos, and no serpentine soils have been detected or mapped onsite.

Soil disturbance activities related to the project include grading to upgrade interior driveways to meet PRC sections 4290 and 4291 commercial driveway standards; preparing areas as parking lots or importing soil for outdoor cultivation (usually fabric pots); and preparation for erecting structures and water tanks. A grading permit will be obtained for approximately 450 cubic yards of earthwork for ground preparation of cultivation areas and building pad preparation. Additionally, the following mitigation measures will be implemented which would reduce the impacts to less than significant:

AQ-1: Prior to obtaining the necessary permits and/or approvals for any phase, applicant shall contact the Lake County Air Quality Management District (LCAQMD) and obtain an Authority to Construct (A/C) permit for all operations and for any diesel-powered equipment and/or other equipment with potential for air emissions.

AQ-2: All mobile diesel equipment used must be in compliance with state registration requirements. Portable and stationary diesel-powered equipment must meet all federal, state, and local requirements, including the requirements of the State Air Toxic Control Measures for compression ignition engines. Additionally, all engines must notify LCAQMD prior to beginning construction activities and prior to any diesel engine use.

AQ-3: The applicant shall maintain records of all hazardous or toxic materials used, including a Material Safety Data Sheet (MSDS) for all volatile organic compounds utilized, including cleaning materials. Said information shall be made available upon request and/or the ability to provide the LCAQMD such information in order to complete an updated Air Toxic emission Inventory.

AQ-4: All vegetation removed during site development shall be chipped and spread for ground cover and/or erosion control. The burning of vegetation, construction debris, including waste material is prohibited.

AQ-5: The applicant shall have the primary access and parking areas surfaced with chip seal, asphalt, or an equivalent all weather surfacing to reduce fugitive dust generation. The use of white rock as a road base or surface material for travel routes and/or parking areas is prohibited.

AQ-6: All areas subject to infrequent use of driveways, overflow parking, etc., shall be surfaced with gravel, chip seal, asphalt, or an equivalent all weather surfacing. Applicant shall regularly use and/or maintain graveled area to reduce fugitive dust generations.

AQ-7: All buildings containing mature cannabis plants shall be equipped with carbon or similar air filtration systems prior to cultivation.

Less than Significant Impact with Mitigation Measures AQ-1 through AQ-7 incorporated.

- d) The proposed project has the potential to cause objectionable odors, particularly during the harvest season. The applicant has prepared an Odor Monitoring and Mitigation Program within the Property Management Plan (Plan). The applicant is required to install carbon filtration systems inside the barn and in any other building that will contain cannabis plants. With the nearest off-site dwelling being located over 600 feet from the outdoor canopy area, and exceeding the 200-foot setback, given the sparse population of the area, a substantial number of people will not be adversely affected by potential air quality issues.

The proposed cultivation would generate minimal amounts of carbon dioxide from operation of small gasoline engines (tillers, weed eaters, lawn mowers, etc.) and from vehicular traffic associated with staff commuting, deliveries and pickups. This was discussed in greater detail under "a" above.

Less than Significant Impact with Mitigation Measures AQ-1 and AQ-7 incorporated.

IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
c) Have a substantial adverse effect on state or federally protected wetlands (including, not limited to, marsh, vernal pool, coastal wetlands, 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 Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? | ☐ | ☐ | ☒ | ☐ |

Discussion:

- a) Two Biological Resources Reports and a Technical Memorandum collectively referred to herein as the “Biological Assessments” were prepared for this project. The first report by Huffman-Broadway Group, Inc was prepared June 4, 2019, with a site survey date of April 17, 2019. The second Report was prepared by Graening & Associates, LLC and dated March 5, 2020. The field survey was conducted February 10, 2020; this report was updated on October 13, 2023, to include the proposed expansion areas. A Technical Memorandum for this project was drafted by Graening & Associates, LLC on July 25, 2024, and provides clarification regarding the Project’s potential impact to wetlands.

The Biological Assessments concluded that there was potential to impact some nearby smaller ephemeral stream beds, and that Best Management Practices would reduce the risk to these seasonal channels significantly. The 2023 Biological Report recommended a minimum 50’ setback to these seasonal water channels, however Article 27.13(at) of the Lake County Zoning Ordinance requires a 100’ setback to top-of-bank of any water course, seasonal or otherwise exceeding the recommended setback by the biologist. As noted in the Technical Memorandum, due to the Project’s avoidance of these features, a formal wetland delineation is not required.

The Biological Assessments concluded that listed plant species, while possible to be on site, were not observed during the field survey including within the proposed cultivation activities areas.

The Biological Assessments concluded that no impacts to listed or threatened flora or fauna would occur as the result of cannabis activities on site; and that with implementation of BMPs and 100 foot setbacks, that no impacts to riparian habitat would occur, and that no wetlands would be disturbed by the cannabis proposal.

None of the animal species discussed in the Biological Assessments have the potential to inhabit the cultivation site or the immediate vicinity, so the project would not substantially reduce the number or restrict the range of a rare, endangered or threatened species of fauna. Therefore, no impacts to special status species of plant or animal would occur due to implementation of the project. No tree removal is proposed, however one mitigation measure provided within the biological assessment is intended for proposed activities of grading and vegetation clearing to be performed, and the following mitigation measure (BIO-1) is required:

BIO-1: Nesting Bird Survey. If grading or vegetation clearing is performed in the oak woodland habitat, riparian habitat or chaparral habitat, a pre-construction special-status species survey shall be performed by a qualified biologist. Trees and vegetation shall 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 shall 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 (usually February 15 through September 1), or until after a qualified biologist has determined the young have fledged and are independent of the nest site.

Less than Significant Impact with mitigation incorporated

- b) According to the Lake County General Plan Chapter 9.1 Biological Resources, The County should ensure the protection of environmentally sensitive wildlife and plant life, including those species designated as rare, threatened, and/or endangered by State and/or Federal government," and upon review of the biological report on the parcel, it was determined that no substantial adverse effect will result from the project.

There are no water course crossings on the project parcel. Two existing culverts on Ridge Road will not be utilized by the project. The Biological Assessments did not identify any riparian habitats within the cultivation areas however; the site does contain numerous ephemeral drainages of minor habitat value that originate in the hills and pass through lower elevation areas to feed larger drainage systems. The Report recommends that all ephemeral drainages found in the vicinity of the cultivation area be protected with a 20-foot setback and installation of erosion control devices placed along the edge of the fence surrounding the cultivation area. However, per Article 27 of the Lake County Zoning Ordinance, the minimum setbacks for cultivation activities is 100 feet from the top of the bank. The project design is consistent with the greater setback as imposed by the Lake County Zoning Ordinance. The Property Management Plan submitted indicates that no disturbance of riparian areas or tree removal are proposed as part of this project.

Erosion control measures to control erosion and sedimentation during construction and operation have been identified in the Property Management Plan and in the site plans. Erosion control measures include the placement of straw wattles, vegetated swales, and buffer strips.

Less Than Significant Impact with BIO-1 incorporated

- c) According to the Report and the Update, there are no wetlands and vernal pools or other isolated wetlands within 100 feet of the project area (proposed for development). There are several water resources within the remaining portion of the parcel: Class II and III watercourses, a pond, and a wetland. Potential adverse impacts to water resources could occur during construction by modification or destruction of stream banks or riparian vegetation, the filling of wetlands, or by increased erosion and sedimentation in receiving water bodies due to soil disturbance. However, the cultivation areas have been designed with 100-foot setbacks from watercourses and situated in flat areas. No watercourse crossings are proposed. Because of these avoidance measures, no direct impacts to water resources will occur.

Less Than Significant Impact

- d) The Report and the Update state that no specific wildlife corridors exist within or near the project area. Although no mapped wildlife corridors (such as the California Essential Habitat Connectivity Area layer in the CNDDDB) exist within or near the cultivation area, the open space and the stream corridors in the cultivation area facilitate animal movement and migrations, primarily those of the black-tailed deer. The proposed Project would not have a significant impact on this movement because it would not create any unpassable barriers and the majority of the parcel will still be available for corridor and migration routes. Of the 106 acres on the parcel, about 105 acres would remain available for natural habitat and wildlife corridors.

Although no mapped wildlife corridors (such as the California Essential Habitat Connectivity Area layer in CNDDDB) exist within or near the Project Areas, the open space and the stream corridors in the property facilitate animal movement and migrations. While the property may be used by wildlife for movement or migration, the Project would not have a significant impact on this movement because it would not block movement and the majority of the open space in the property would still be available. Implementation of the proposed project would necessitate erection of security fences around the cultivation areas. These fences do not allow animal movement and may act as a local barrier to wildlife movement. However, the fenced cultivation areas are surrounded by open space, allowing wildlife to move around these fenced areas. Thus, implementation of the proposed project is a less than significant impact upon wildlife movement. Implementation of the project will not 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.

Less than Significant Impact

- e) In Section 27.13 Conditions for Commercial Cannabis Cultivation, of Article 27 of the County of Lake Zoning Ordinance, tree removal is listed under Prohibited Activities, whereas “(the) removal of any commercial tree species as defined by the California Code of Regulations section 895.1, Commercial Species for the Coast Forest District and Northern Forest District, and the removal of any true oak species (*Quercus* species) or Tan Oak (*Notholithocarpus* species) for the purpose of developing a cannabis cultivation site should be avoided and minimized.”

Chapter 30, *Grading Ordinance*, of the Lake County Municipal Code regulates grading, erosion, stormwater runoff, vegetation and tree removal, protection of water courses, etc. Specifically related to tree removal, the Grading Ordinance (Section 30-14.1.2) states, “When vegetation is to be removed, the location of mature trees, defined as greater than five (5) inches diameter at breast height (DBH), that are to be removed and retained shall be clearly indicated. Vegetation to be preserved shall be clearly flagged or fenced off before any clearing or land disturbance begins.” The project is subject to these regulations and will obtain a Grading Permit for the proposed work (also refer to Mitigation Measures GEO-1 through GEO-4).

The County of Lake General Plan Policy OSC-1.13 states the County shall support the conservation and management of oak woodland communities and their habitats, and Resolution Number 95-211 was adopted as a Management Policy for Oak Woodlands in Lake County, whereas the County of Lake aims to monitor oak woodland resources, pursue education of the public, federal, state and local agencies on the importance of oak woodlands, promote incentive programs that foster the maintenance and improvement of oak woodlands, and, through federal, state, and local agency land management programs, foster oak woodlands on their respective lands within the county.

Implementation of the project does not conflict with any county or municipal policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. No trees are proposed for removal; ~~however, in the event tree removal is needed, a replacement ratio of 3:1 will be implemented, as specified in Mitigation Measure BIO-2.~~

~~BIO-2: Vegetation clearing and tree removal shall be in accordance with the County's Grading Ordinance (Chapter 30 of the Lake County Municipal Code). Should there be removal of healthy, mature native oaks, a 3:1 replacement ratio shall be implemented. oak species for a 3:1 replacement ratio. A preconstruction survey is required.~~

Less than Significant Impact Measures BIO-1, ~~BIO-2,~~ and GEO-1 through GEO-4 incorporated

- f) There is no adopted Habitat Conservation Plan, Natural Community Conservation Plan or other approved local, regional, or state habitat conservation plan applicable to the project site and no impacts are anticipated.

Less Than Significant Impact

V. CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archeological resource pursuant to §15064.5?	☐	☒	☐	☐

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

Discussion:

a) A Cultural Resources Assessment with intensive pedestrian surveys of the Project site was prepared by Natural Investigations, Inc., and dated March 2020. These surveys included the original project footprint and expansion areas. Two prehistoric isolates were discovered during the survey; however, they do not meet the criteria for significance under CEQA. Regardless, the Archaeologist recorded these findings with the State of California. Based on the findings of this assessment, there is no indication that the Project will impact any historical resources as defined under CEQA Section 15064.5, unique archaeological resources as defined under CEQA Section 21083.2(g), or Tribal Cultural Resources as defined under Public Resources Code Section 21074. For these reasons, no further cultural resources work was recommended. An inquiry to the California Historical Resources Information System (CHRIS) was sent on February 4, 2020, and June 7, 2024, for the Project Property. CHRIS recommended the lead agency contact the local Native American tribe(s) regarding traditional, cultural, and religious heritage values.

Notification of the project and offering consultation under AB-52 was sent to Big Valley Rancheria, Cortina Rancheria, Elem Colony, Hopland Band of Pomo Indians, Koi Nation, Mishewal-Wappo, Middletown Rancheria, Redwood Valley Rancheria, Robinson Rancheria, Scotts Valley Band of Pomo Indians, Habematolel Pomo of Upper Lake Tribe, and Yocha Dehe Wintun Nation on December 1, 2023, and June 7, 2024, by the County of Lake. Of the notified Tribes, the Habematolel Pomo of Upper Lake Tribe and Yocha Dehe Wintun Nation both responded to the notice and deferred to Big Valley Band of Pomo Indians. The Community Development Department has not received an AB 52 Tribal Consultation request for this Project.

It is possible, but unlikely, that significant artifacts or human remains could be discovered during Project construction. If, however, significant artifacts or human remains of any type are encountered it is recommended that the project sponsor contact the culturally affiliated tribe and a qualified archaeologist to assess the remains. The Sheriff's Department must also be contacted if any human remains are encountered. This is required by the Grading Ordinance section 30.8, Cultural Resources, and Public Resource Code. This is reiterated within the previously approved commercial cannabis use permits MUP 19-15 and MUP 22-11 conditions of approval. The following mitigation measures will be implemented which would reduce the impacts to less than significant:

CUL-1: All employees shall be trained in recognizing potentially significant archaeological, paleontological, or cultural materials artifacts that may be discovered during ground disturbance. Prior to ground disturbing activities, the Permittee shall submit a Cultural Resources Plan, identifying methods of sensitivity training for site workers, procedures in the event of an accidental discovery, and documentation and reporting procedures. Prior to ground disturbing activities, the Permittee shall submit verification that all site workers have reviewed the Cultural Resources Plan and received sensitivity training.

Should any archaeological, paleontological, or cultural materials be discovered during site development, all activity shall be halted in the vicinity of within 100 feet of the find(s). , the Permittee shall notify the culturally affiliated Tribe(s), and a professional archaeologist certified by the Registry of Professional Archeologists (RPA) shall be notified and qualified archaeologist shall to evaluate the find(s) and recommend mitigation procedures, if necessary. The findings and mitigation measures shall be reviewed and subject to the approval of the Lake County Community Development Director prior to commencing work.

CUL-2: Should any human remains be encountered, the Permittee shall halt all work within 100 feet, notify the Sheriff's Department, the culturally affiliated Tribe(s), and a qualified archaeologist for proper internment and Tribal rituals per Public Resources Code Section 5097.98 and Health and Safety Code 7050.5.

Less than Significant Impact with Mitigation Measures CUL-1 and CUL-2 through incorporated.

- a) A California Historical Resources Information System (CHRIS) records search was completed by the Northwest Information Center (NWIC) to determine if the Project would affect archaeological resources. The record search found that there are no mapped historically significant sites on the project property.

The County has added two mitigation measures to protect any culturally-sensitive items that might be inadvertently discovered during site preparation and operations which are added as mitigation measures (CUL-1 through CUL-3) above.

Less than Significant Impact with Mitigation Measures CUL-1 through ~~CUL-3~~ and CUL-3-2 incorporated.

- b) The project site does not contain a cemetery and there are no known cemeteries are located within the immediate site vicinity. In the event that human remains are discovered on the project site, the project would be required to comply with the applicable provisions of Health and Safety Code §7050.5, Public Resources Code §5097 et. seq. and CEQA Guidelines §15064.5(e). California Health and Safety Code §7050.5 states that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin. Pursuant to California Public Resources Code §5097.98(b), remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made by the Coroner.

If the Coroner determines the remains to be Native American, the California Native American Heritage Commission must be contacted and the Native American Heritage Commission must then immediately notify the "most likely descendant(s)" of receiving notification of the discovery. The most likely descendant(s) shall then make recommendations within 48 hours and engage in consultations concerning the treatment of the remains as provided in Public Resources Code §5097.98. Mandatory compliance with these requirements would ensure that potential impacts associated with the accidental discovery of human remains would be less than significant.

Less than Significant Impact with Mitigation Measures CUL-1 and CUL-3-2 incorporated.

VI. ENERGY

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

Discussion:

- a) Onsite electricity will be supplied by an existing Pacific Gas and Electric Company (PG&E) service and small solar photovoltaic systems. The applicant has provided an Energy Report dated April 2024 for the power needs for the project. According to this report the project will not result in an excessive or significant energy demand and inefficient energy use during long-term operations, although there could be an increased in Greenhouse Gas Emissions. The onsite residence is served by a 200-amp service and the existing shop building has a 200 amp service; the new 2,500 sf building may need an additional 200 amp service. There are no known grid capacity issues at this location. A back-up generator is proposed for emergency use only.

Less than Significant Impact

- b) According to the California Department of Cannabis Control's Title 4 Division 19 §15010 on compliance with the CEQA, all cannabis applications must describe their project's anticipated operational energy needs, identify the source of energy supplied for the project and the anticipated amount of energy per day, and explain whether the project will require an increase in energy demand and the need for additional energy resources. The applicant has submitted a Property Management Plan that details the project's anticipated operational energy requirements and has identified the existing service provided by Pacific Gas and Electric Company (PG&E). PG&E has provided an agency comment stating there is no foreseen issues at this location. Additionally, an Energy Report dated April 2024 has been provided, which assesses the electrical needs of the project. The project proposes an electrical upgrade to the existing connection as described above.

Less than Significant Impact

VII. GEOLOGY AND SOILS

Potentially Significant Impact	Less Than Significant With Mitigation Measures	Less Than Significant Impact	No Impact
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Would the project:

- a) Directly or indirectly cause potentially 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?

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

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

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

☐	☒	☐	☐
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- 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 waste water?

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

☐	☒	☐	☐
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Discussion:

- a) The Project site is located in a seismically active area of California and is expected to experience moderate to severe ground shaking during the lifetime of the project. That risk is not considered substantially different than that of other similar properties and projects in California.

Earthquake Faults (i)

According to the USGS Earthquake Faults map available on the Lake County GIS Portal, there are no earthquake faults in the vicinity of the subject site. Because there are no known faults located on the project site, there is little potential for the project site to rupture during a seismic event. Thus, no rupture of a known earthquake fault is anticipated, and the proposed project would not expose people or structures to an adverse effects related rupture of a known earthquake fault.

Seismic Ground Shaking (ii) and Seismic-Related Ground Failure, including liquefaction (iii)

Lake County contains numerous known active faults. Future seismic events in the Northern California region can be expected to produce seismic ground shaking at the site. No new structures are proposed on this project site.

Landslides (iv)

The project cultivation sites are generally level without significant slopes, although the remaining portions of the property are significantly sloped. There are some risks of landslides on the parcel, however the proposed project's cultivation site is located on a flat area along the top of the ridgeline. According to the Landslide Hazard Identification Map prepared by the California Department of Conservation's Division of Mines and Geology, the area is considered generally stable. As such, the project's cultivation site is considered moderately susceptible to landslides and will not likely expose people or structures to substantial adverse effects involving landslides, including losses, injuries or death.

Less Than Significant Impact

- b) The cultivation areas were designed to be located primarily on areas previously cleared of vegetation. Preliminary engineered grading information is provided on the updated site plans for the project. Expansion of the cultivation operations will require some grading; and a grading permit will be obtained for approximately 450 cubic yards of earthwork for ground preparation of cultivation areas, building pad preparation, and construction of interior roadways meeting Public Resource Code Sections 4290 and 4291 requiring roadways to be twenty feet wide with hammerhead turnaround. An Erosion and Sediment Control Plan has been prepared and being implemented at the site for approved operations. Preliminary grading is noted on the site plan dated September 2024 along with Erosions and Sediment Control Plans. The project involves moderate grading for the indoor cultivation barn and processing facility pad preparation as well as soil tilling/discing for cultivation preparation and interior roadways as described above. According to the Property Management Plan this would not involve any adverse effects on the potential for erosion or the loss of topsoil. The proposed structures require the applicant to apply for and obtain a building permit from the Lake County Community Development Department prior to construction of the structures. A Grading Permit will also be required.

The project is enrolled with the SWRCB for Tier 2, Low Risk coverage under Order No. WQ 2019-001-DWQ (Cannabis Cultivation General Order). The Cannabis Cultivation General Order implements Cannabis Policy requirements with the purpose of ensuring that the diversion of water and discharge of waste associated with cannabis cultivation does not have a negative impact on water quality, aquatic habitat, riparian habitat, wetlands, or springs. The General Order requires the preparation of a Site Management Plan (SMP), a Nitrogen Management Plan (NMP), and the submittal of annual technical and monitoring reports demonstrating compliance. The purpose of the SMP is to identify

BPTC measures that the site intends to follow for erosion control purposes and to prevent stormwater pollution. The purpose of the NMP is to identify how nitrogen is stored, used, and applied to crops in a way that is protective to water quality. The SMP and NMP are required prior to commencing cultivation activities. These Plans have been prepared and were submitted with the Major Use Permit application materials. As part of the Applicant's enrollment, they are required to complete Annual Monitoring and Reporting to the State Water Board, which requires that winterization BPTC measures for erosion and sediment control are in place prior to the winter period. The following mitigation measures will be implemented which would reduce the impacts to less than significant:

GEO-1: All grading, including excavation, filling, vegetation clearing, or other disturbance of the soil related activities, shall be in accordance with the County's Grading Ordinance (Chapter 30 of the Lake County Municipal Code). Grading shall not occur between October 15 and April 15 unless authorized by the Community Development Department Director, as specified in the Grading Ordinance.

GEO-2: The permit holder shall monitor the site during the rainy season (October 15 – May 15), including post-installation, application of BMPs, erosion control maintenance, and other improvements as needed.

GEO-3: A Grading Permit shall be required as part of this project. The project design shall incorporate Best Management Practices (BMPs) to the maximum extent practicable to prevent or reduce the discharge of all construction or post-construction pollutants into the County storm drainage system. BMPs typically include scheduling of activities, erosion and sediment control, operation and maintenance procedures, and other measures in accordance with Chapters 29 and 30 of the Lake County Code.

GEO- 4: All work shall incorporate erosion control measures consistent with the State Water Resources Control Board Order No. WQ 2019-001-DWQ.

Less Than Significant Impact with Mitigation Measures GEO-1 through GEO-4 incorporated.

- c) The primary geologic unit on the project site is Type 247 – Wolfcreek Loam. This map unit is deep and well-drained characterized by slow permeability, slow surface runoff, and low risk of landslides. The secondary geological unity on the project site is Type 249 Xerofluvents-Riverwash complex. This map unit is very deep excessively drained characterized by rapid permeability, very slow surface runoff, and a slight risk of erosion.

The applicant has submitted a Property Management Plan (Plan) addressing Stormwater and Erosion Control in anticipation of the incorporation of Best Management Practices as being a requirement. The Plan has mitigation measures that will decrease the likelihood of the loss of topsoil due to erosion.

Less Than Significant Impact with Mitigation Measures GEO-1 through GEO-4 incorporated.

- d) The Uniform Building Code is a set of rules that specify standards for structures. All structures that are proposed that would require a building permit, and the soil subtypes are generally stable. The applicant has submitted a Property Management Plan including a section on Stormwater and Erosion Control.

The Uniform Building Code is a set of rules that specify standards for structures. All new construction requiring a building permit, including the proposed processing facility and barn, would be subject to the Uniform Building Code and California Building Code for foundation design to meet the requirements associated with expansive soils, if they are found to exist within a site-specific study. Prior to operation, all buildings, accessible compliant parking areas, routes of travel, building access, and/or bathrooms shall meet all California Building Code Requirements. All structure(s) used for commercial cultivation shall meet accessibility and CALFIRE standard. The following mitigation measures will be implemented which would reduce the impacts to less than significant:

Less Than Significant Impact with Mitigation Measures GEO-1 through GEO-4 incorporated.

- e) The proposed project will be served by an Americans with Disability Act compliant restroom facility located within the proposed processing facility. A new septic system is required for this project. The primary geologic unit on the project site is Type 247 – Wolfcreek Loam. This map unit is deep and well-drained characterized by slow permeability, slow surface runoff, and low risk of landslides. The secondary geological unit on the project site is Type 249 Xerofluvents-Riverwash complex. This map unit is very deep excessively drained characterized by rapid permeability, very slow surface runoff, and a slight risk of erosion.

Less Than Significant Impact

- f) The project site does not contain any known unique geologic feature or paleontological resources, and the Cultural Resources Assessment performed by Natural Investigations, Inc., yielded negative results of finds of CEQA significance. Disturbance of sensitive prehistoric resources is not anticipated. The following mitigation measures will be implemented which would reduce the impacts to less than significant:

GEO-5: If paleontological resources are encountered during implementation of the Project, ground disturbing activities will be temporarily redirected from the vicinity of the find. A qualified paleontologist shall be retained by the developer to make an evaluation of the find. If a significant paleontological resource(s) is discovered on the property, the qualified paleontologist / archaeologist shall develop a plan of mitigation which shall include salvage excavation and removal of the find, removal of sediment from around the specimen (in the laboratory), research to identify and categorize the find, curation in the find a local qualified repository, and preparation of a report summarizing the find.

Less than Significant Impact with Mitigation Measure GEO-5 incorporated.

VIII. GREENHOUSE GAS EMISSIONS

Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
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Would the project:

- 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?

☐	☐	☒	☐
☐	☐	☒	☐

Discussion:

- a) The proposed project at buildout will include a total of 107,120 sf of outdoor canopy (20,000 sf approved and 87,120 sf new) and 8,820 sf of indoor canopy (2,400 sf approved and 6,420 sf new). The project site is located within the Lake County Air Basin, which is under the jurisdiction of the Lake County Air Quality Management District (LCAQMD). The LCAQMD applies air pollution regulations to all major stationary pollution sources and monitors countywide air quality.

The cultivation site is located about nine miles from downtown Kelseyville, the nearest population base and the likely residency of employees. Up to four employees are likely during peak harvest times, with three employees working during construction; site preparation and during non-peak harvest times. Assuming each employee drives 18 miles to and from work, a total of 54 vehicle miles per day would result during normal operations, and a total of 72 miles would result during peak times. A total of two weekly deliveries would result from non-employees, adding an additional 4 trips per week for a conservative estimate of approximately 76 vehicle miles per day. CO₂ emissions are quantifiable. According to the EPA, a vehicle produces on average 404 grams of CO₂ emissions per vehicle mile traveled for a total of 7,904 grams of CO₂ emissions per vehicle mile traveled.

Within Section XVII, Transportation, the OPR Technical Advisory identifies several criteria that may be used to identify certain types of projects that are unlikely to have a significant VMT impact and can be "screened" from further analysis. One of these screening criteria pertains to small projects, which OPR defines as those generating fewer than 110 new vehicle trips per day on average.

OPR specifies that VMT should be based on a typical weekday and averaged over the course of the year to take into consideration seasonal fluctuations. Up to three full-time employees are proposed with an estimation of six trips proposed per day. Up to four employees are proposed during peak planting and harvest season with up to eight trips proposed per day.

Vehicle Trips During Construction

Construction duration for Stage II of development is anticipated for three months, Monday through Saturday. Up to three employees are proposed at construction. The County estimates that six daily trips (two arriving, two departing) will result from three employees

during construction for a total of approximately 432 total employee trips in addition to up to 14 delivery trips during construction for a total of 446 trips during construction.

The proposed project is anticipated to operate from 8:00 a.m. to 7:00 p.m., Monday through Sunday with flexibility to operate under traditional agricultural hours specific to planting and harvesting activities. The estimated maximum number of employees during peak planting and harvest season is four employees. Vehicle trips per day are expected to be up to eight trips. The County anticipates that up to two deliveries per week on average will occur during operations and following site construction for each stage. The applicant is proposing four parking spaces including one (1) ADA parking space (the project site is flat at the cultivation site and has ample room for additional non-designated parking).

The state of California has adopted various administrative initiatives and legislation relating to climate change, much of which set aggressive goals for GHG emissions reductions statewide. Although lead agencies must evaluate climate change and GHG emissions of projects subject to CEQA, the CEQA Guidelines do not require or suggest specific methodologies for performing an assessment or specific thresholds of significance and do not specify GHG reduction mitigation measures. No state agency has developed binding regulations for analyzing GHG emissions, determining their significance, or mitigating significant effects in CEQA documents. Thus, lead agencies exercise their discretion in determining how to analyze GHGs. Because there are no adopted GHG thresholds applicable to the Project, and the proposed development is considered “small scale”, meaning that it does not include new large buildings or components requiring significant construction that would result in increased GHGs, the below qualitative analysis is appropriate.

The Lake County Air Basin is in attainment for all air pollutants with a high air quality level, and therefore the LCAQMD has not adopted thresholds of significance for Greenhouse Gas (GHG) emissions. In the interim, emissions estimates have been calculated using the California Emissions Estimator Model (CalEEMod) and compared with thresholds defined by the Bay Area Air Quality Management District (BAAQMD). The recommended maximum threshold used by Lake County is 1,100 metric tons per project. This project would not exceed the significance threshold for CO₂ emissions. As stated in the Air Quality section of this documents, the project amount of CO₂ emissions is negligible during construction and would have no emissions during operations.

Less than Significant Impact

- b) For purposes of this analysis, the Project was evaluated against the following applicable plans, policies, and regulations:

- The Lake County General Plan
- The Lake County Air Quality Management District
- AB 32 Climate Change Scoping Plan
- AB 1346 Air Pollution: Small Off-Road Equipment

Policy HS-3.6 of the Lake County General Plan on Regional Agency Review of Development Proposals states that the “County shall solicit and consider comments from local and regional agencies on proposed projects that may affect regional air quality. The

County shall continue to submit development proposals to the Lake County Air Quality Management District for review and comment, in compliance with the California Environmental Quality Act (CEQA) prior to consideration by the County.” The proposed Project was sent out for review from the LCAQMD and the only concern was restricting the use of an onsite generator to emergency situations only.

The Lake County Air Basin is in attainment for all air pollutants with a high air quality level, and therefore the LCAQMD has not adopted an Air Quality Management Plan, but rather uses its rules and regulations for the purpose of reducing the emissions of greenhouse gases. The proposed Project does not conflict with any existing LCAQMD rules or regulations and would therefore have no impact at this time.

The 2017 AB Climate Change Scoping Plan recognizes that local government efforts to reduce emissions within their jurisdiction are critical to achieving the State’s long term GHG goals, which includes a primary target of no more than six (6) metric tons CO₂ per capita by 2030 and no more than two (2) metric tons CO₂ per capita by 2050. As described in the Property Management Plan, the Project will have two (2) individuals working on site (owners/operators) during normal operational hours, and with an expected 10 metric tons of overall operational CO₂ per year.

On October 9, 2021, AB 1346 Air Pollution: Small Off-Road Equipment (SORE) was passed, which will require the state board, by July 1, 2022, consistent with federal law, to adopt cost-effective and technologically feasible regulations to prohibit engine exhaust and evaporative emissions from new small off-road engines, as defined by the state board. The bill would require the state board to identify and, to the extent feasible, make available funding for commercial rebates or similar incentive funding as part of any updates to existing applicable funding program guidelines to local air pollution control districts and air quality management districts to implement to support the transition to zero-emission small off-road equipment operations, and the applicant should be aware of and expected to make a transition away from SOREs by the required future date.

Less than Significant Impact

IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
Would the project:				
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 reasonable 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) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? | ☐ | ☐ | ☐ | ☒ |
| f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | ☐ | ☐ | ☒ | ☐ |
| g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? | ☐ | ☒ | ☐ | ☐ |

- a) Materials associated with the proposed cultivation of commercial cannabis, such as gasoline, pesticides, fertilizers, alcohol, hydrogen peroxide and the equipment emissions may be considered hazardous if unintentionally released and could create a significant hazard to the public or the environment if done so without intent and mitigation. According to the Property Management Plan (plan) for the proposed project, only natural fertilizers and pesticides will be used. The plan indicates that all potentially harmful chemicals would be stored and locked in a secured building on site and measures will be taken to avoid any accidental release and environmental exposure to hazardous materials.

The project will comply with Section 41.7 of the Lake County Zoning Ordinance that specifies that all uses involving the use or storage of combustible, explosive, caustic, or otherwise hazardous materials shall comply with all applicable local, state, and federal safety standards and shall be provided with adequate safety devices against the hazard of fire and explosion, and adequate firefighting and fire suppression equipment.

The Lake County Division of Environmental Health, which acts as the Certified Unified Program Agency (CUPA) for Hazardous Materials Management, has been consulted about the project and the project is required to address Hazardous Material Management in the Property Management Plan, which has been reviewed by the Lead Agency to ensure the contents are current and adequate. In addition, the Project will require measures for employee training to determine if they meet the requirements outlined in the Plan and measures for the review of hazardous waste disposal records to ensure proper disposal methods and the amount of wastes generated by the facility.

The Property Management Plan also notes the following BMPs related to hazardous materials:

- Bulk fertilizers will be incorporated into the soil shortly after delivery and will not typically be stockpiled or stored on site. Should bulk fertilizers need to be stockpiled, they will be placed on a protective surface, covered with tarps, and secured with ropes and weights, or stored within the shipping containers on site. Dry and liquid fertilizers will be stored within stormproof sheds inside the cultivation compound.
- Cannabis waste will be chipped and spread on site, composted as needed, or hauled to Quackenbush Mountain Resource, a waste composting facility for vegetative materials. The burning of cannabis waste is prohibited in Lake County and will not take place as part of Project operations.
- All other pesticides and fertilizers will be stored within one of the shipping containers, in their original containers with labels intact, and in accordance with the product labeling. Agricultural chemicals and petroleum products will be stored in secondary containment, within separate storage structures alongside compatible chemicals. The pesticide, fertilizer, chemical, and petroleum product storage buildings will have impermeable floors. The storage building will be located over 100 feet from any watercourses. There are two watercourses that are in vicinity of the cultivation area. Both are mapped and located beyond 100 feet of the cultivation area.

Any petroleum products brought to the site, such as gasoline or diesel to fuel construction equipment, will be stored and covered in containers deemed appropriate by the Certified Unified Program Agency. All pesticides and fertilizers products will be stored a minimum of 100 feet from all potentially sensitive areas and watercourses. A spill containment and cleanup kit will be kept on site in the unlikely event of a spill. All employees would be trained to properly use all cultivation equipment, including pesticides. Proposed site activities would not generate any additional hazardous waste. All equipment shall be maintained and operated in a manner that minimizes any spill or leak of hazardous materials. Hazardous materials and contaminated soil shall be stored, transported, and disposed of in accordance with applicable local, state, and federal regulations.

As long as the Project is in operation, the Certified Uniform Program Agency and Lead Agency will conduct regular and/or annual inspections and monitor activities to ensure that the routine transport, use, and disposal of hazardous materials will not pose a significant impact. The following mitigation measures will be implemented which would reduce the impacts to less than significant:

HAZ-1: All equipment shall be maintained and operated to minimize spillage or leakage of hazardous materials. All equipment shall be refueled in locations more than 100 feet from surface water bodies. Servicing of equipment shall occur on an impermeable surface. In the event of a spill or leak, the contaminated soil shall be stored, transported, and disposed of consistent with applicable local, state, and federal regulations.

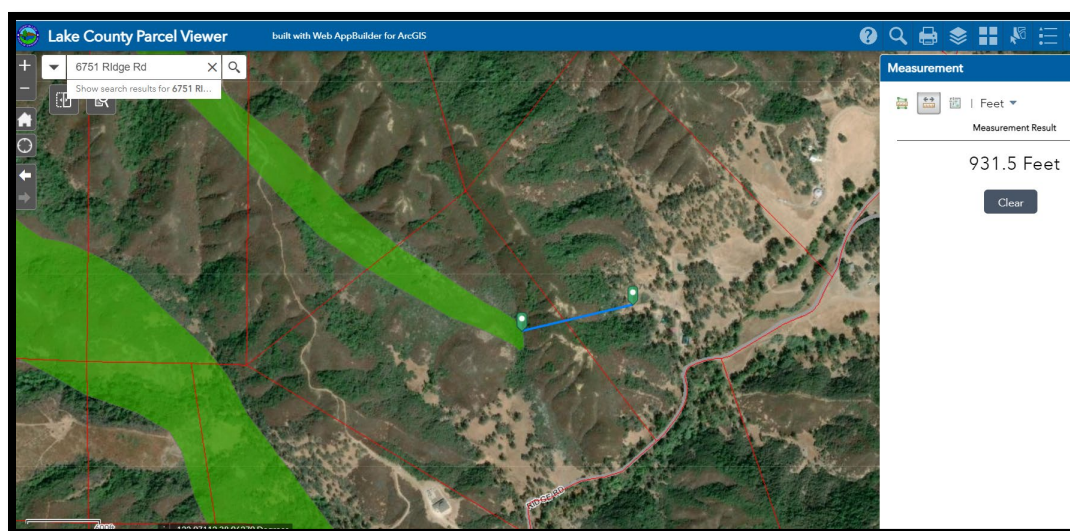
HAZ-2: With the storage of hazardous materials equal to or greater than fifty-five (55) gallons of a liquid, 500 pounds of a solid, or 200 cubic feet of compressed gas, a Hazardous Materials Inventory Disclosure Statement and Business Plan shall be submitted and maintained in compliance with requirements of Lake County Environmental Health Division. Industrial waste shall not be disposed of on site without review or permit from Lake County Environmental Health Division or the California Regional Water Quality Control Board. The permit holder shall comply with petroleum fuel storage tank regulations if fuel is to be stored on site.

Less Than Significant Impact with Mitigation Measures HAZ-1 and HAZ-2 incorporated.

- b) The Project involves the use of organic fertilizers and pesticides which shall be stored in a secure, stormproof structure. Flood risk at the Project site is minimal and according to Lake County GIS Portal data and the Project is not located in or near an identified earthquake fault zone. Fire hazard risks on the Project site is very high; the applicant has indicated that four (4) 2,500-gallon water tanks and twelve (12) 5,000-gallon water tank shall be placed near the cultivation areas, and that one (1) 5,000 gallon water tank is exclusively for fire suppression.

Construction duration for Stage I of development is anticipated for a duration of between two to three months to construct 2,500 sf barn for indoor cultivation and install perimeter fencing around the three-acre cultivation area. During Stage II of development between two to three months of construction time is anticipated to build the proposed 2,500 sf processing facility. All equipment staging shall occur on previously disturbed areas on the site. The project site does not contain any identified areas of serpentine soils or ultramafic rock, and risk of asbestos exposure during construction is minimal. According to the USDA Soil Survey and the ultramafic, ultrabasic, serpentine rock and soils map of Lake County, serpentine soils have not been found within the project property. There is some mapped serpentine soil located on an adjacent lot; however, the cultivation area is located over 930 feet from the pocket of serpentine soil on the adjacent parcel.

FIGURE 10 –CLOSEST MAPPED SERPENTINE SOILS ON ADJACENT PARCEL



Source: Lake County GIS Parcel

A spill kit would be kept on site in the unlikely event of a spill of hazardous materials. All equipment shall be maintained and operated in a manner that minimizes any spill or leak of hazardous materials. Hazardous materials and contaminated soil shall be stored, transported, and disposed of consistent with applicable local, state, and federal regulations. The following mitigation measures shall be implemented which would reduce the impacts to less than significant:

HAZ-3: Prior to operation, the applicant shall schedule an inspection with the Lake County Code Enforcement Division within the Community Development Department to verify adherence to all requirements of Chapter 13 of the Lake County Code, including but not limited to adherence with the Hazardous Vegetation requirements.

HAZ-4: Prior to operation, all employees shall have access to restrooms and hand-wash stations. The restrooms and hand wash stations shall meet all accessibility requirements.

HAZ-5: The proper storage of equipment, removal of litter and waste, and cutting of weeds or grass shall not constitute an attractant, breeding place, or harborage for pests.

HAZ-6: All food scraps, wrappers, food containers, cans, bottles, and other trash from the project area should be deposited in trash containers with an adequate lid or cover to contain trash. All food waste should be placed in a securely covered bin and removed from the site weekly to avoid attracting animals.

HAZ-7: The applicant shall maintain records of all hazardous or toxic materials used, including a Material Safety Data Sheet (MSDS) for all volatile organic compounds utilized, including cleaning materials. Said information shall be made available upon request and/or the ability to provide the Lake County Air Quality Management District with such information to complete an updated Air Toxic Emission Inventory.

Less than Significant Impact with HAZ-1 through HAZ-7 incorporated.

- c) The site is located within the Lakeport Unified School District. The district compound contains an elementary, middle, high school, and alternative education schools. The compound is located approximately 7.7 miles from parcel line to parcel line.

No Impact

- d) The California Environmental Protection Agency (CALEPA) has the responsibility for compiling information about sites that may contain hazardous materials, such as hazardous waste facilities, solid waste facilities where hazardous materials have been reported, leaking underground storage tanks and other sites where hazardous materials have been detected. Hazardous materials include all flammable, reactive, corrosive, or toxic substances that pose potential harm to the public or environment.

The following databases compiled pursuant to Government Code §65962.5 were checked for known hazardous materials contamination within ¼-mile of the project site:

- The SWRCB GeoTracker database
- The Department of Toxic Substances Control EnviroStor database

- The SWRCB list of solid waste disposal sites with waste constituents above hazardous waste levels outside the waste management unit.

The project site is not listed in any of these databases as a site containing hazardous materials as described above.

No Impact

- e) The Project site is located approximately three miles from the nearest airport, Lampson Field, which has not adopted an Airport Land Use Compatibility Plan. In accordance with regional Airport Land Use Compatibility Plans, the site would not be located within an area of influence for the airport. The project is not located within the “AA” Airport Approach Combining District. Therefore, there will be no hazard for people working in the project area from Lampson Field.

No Impact

- f) Access to the project site is from Ridge Road, an unmaintained county road. Ridge Road runs directly in front of the project parcel and would be used as an emergency evacuation route if necessary. The road is a gravel road and varies in width. The road is capable of supporting a 75,000-pound emergency vehicle and interior driveway upgrades are required as a part of the project (see discussion below). A steel, fiberglass, or concrete 5,000 gallon water tank currently serves the site. An additional steel, fiberglass, or concrete 5,000 gallon water tank is required. The security gate is to be equipped with a knoxbox for emergency access/entry by first responders.

Less than Significant Impact

- g) The project site is on an area of high fire risk. CALFIRE’s requirement for defensible space in high fire risk areas requires the removal of brush and vegetation that would reduce fire risk 100 feet around the existing buildings on site. The interior driveway already meets Public Resource Code (PRC) 4290 and 4291 standards. Additional interior roadway improvements are required for development of the proposed processing facility and additional barn for indoor cultivation. The project is also required to have water storage calculated by National Fire Protection Agency National Fire Protection Association (NFPA) standards for dedicated water tanks for fire suppression.

The applicant would adhere to all federal, state, and local fire requirements and regulations for setbacks and defensible space required for any new buildings that require a building permit. All proposed construction will comply with current State of California Building Code construction standards. To construct the proposed structures, the applicant will be required to obtain a building permit with Lake County to demonstrate conformance with local and state building codes and fire safety requirements. Additionally, Mitigation Measures WDF-1 through WDF-4 would be implemented (See Section XX, Wildfire, of this Initial Study for more information).

X. HYDROLOGY AND WATER QUALITY

Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
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Would the project:

- | | | | | |
|---|--------------------------|-------------------------------------|-------------------------------------|--------------------------|
| 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 that would: | | | | |
| i) Result in substantial erosion or siltation on-site 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; or | | | | |
| iv) Impede or redirect flood flows? | | | | |
| d) In any 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? | ☐ | ☒ | ☐ | ☐ |

Discussion:

- a) The Lake County Zoning Ordinance requires that all cultivation operations be located at least 100-feet away from all waterbodies (i.e. spring, top of bank of any creek or seasonal stream, edge of lake, wetland or vernal pool). This property has no vehicle stream crossings inside the property boundaries. There are 2 stream crossings on Ridge Road; both are pipe culverts. Ridge Road is maintained by the ~~County~~ **property owners in the area**. According to the proposed Project's *Property Management Plan – Waste Management Plan*, the cultivation operation is enrolled in the State Water Resources Control Board's Order WQ 2019-0001-DWQ *General Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities* (General Order). Compliance with this Order will ensure that cultivation operations will not significantly impact water resources by using a combination of BPTC measures, buffer zones, sediment and erosion controls, inspections and reporting, and regulatory oversight. Additionally, cultivators who enroll in the State Water Board's Waste Discharge Requirements for Cannabis Cultivation Order WQ 2019-001-DWQ must comply with the Minimum Riparian Setbacks. Cannabis cultivators must comply with setbacks for all land disturbances, cannabis cultivation activities, and facilities (e.g., material or vehicle storage, diesel powered pump locations, water storage areas, and chemical toilet placement). A Stormwater and Erosion Control Plan is being implemented as part of the Property Management Plan. A grading permit in accordance with Chapter 30 of the Lake County Municipal Code will be obtained for approximately 450

cubic yards of earthwork for ground preparation of cultivation areas, interior roadway improvements, and building pad preparation.

Potential adverse impacts to water resources could occur during construction by modification or destruction of stream banks or riparian vegetation, the filling of wetlands, or by increased erosion and sedimentation in receiving water bodies due to soil disturbance. Project implementation will not directly impact any channels or wetlands. Soil disturbance from project implementation could increase erosion and sedimentation. Regulations at both the County and State levels require the creation and implementation of an erosion control and stormwater management plan. The applicant has provided a Property Management Plan addressing Stormwater and erosion control measures. Interior roadway improvements consisting of 20 feet wide roadways are proposed.

As described above, the design of the project's cultivation sites meets the required setbacks from waterbodies and is situated in the flattest practical areas to reduce the potential for water pollution and erosion.

Less Than Significant Impact with Mitigation Measures GEO-1 through GEO-4 incorporated.

- b) Due to the former drought conditions, on July 27, 2021, the Lake County Board of Supervisors passed an Urgency Ordinance (Ordinance 3106) requiring land use applicants to provide enhanced water analysis during a declared drought emergency. Ordinance 3106 requires that all project that require a CEQA analysis of water use include the following items in a Hydrology Report prepared by a licensed professional experienced in water resources:
- Approximate amount of water available for the project's identified water source,
 - Approximate recharge rate for the project's identified water source, and
 - Cumulative impact of water use to surrounding areas due to the project

While the drought conditions have significantly changed and there is no longer a declared drought emergency, the Community Development Department will continue to require Hydrological Assessments (Hydrology Reports) for all land use permits in accordance to the Lake County Zoning Ordinance.

Water Analysis

A Hydrology Report and Drought Management Plan was prepared by Northpoint Consulting in April 2024 for the expansion project. A technical memo was prepared in March of 2025 updating the hydrology report based on the revised project design and the resulting reduction in water demand. The Hydrology Report and updated technical memorandum includes approximate amount of water available for the project's identified water source, approximate recharge rate for the project's identified water source, cumulative impact of water use to surrounding areas due to the project, and a Drought Management Plan (DMP) depicting how the applicant proposes to reduce water use during a declared drought emergency.

The Hydrology Report (Report) evaluated four existing wells. The wells range in depth from 160 ft to 300 ft and have a combined yield of about 38 gpm (61.3 acre-feet/year or AFY). Well #1 will be used to source water for the existing residence, nearby 10,000 sf outdoor cannabis canopy and the indoor canopy. This area is identified in the Report as Area 1. Production tests were conducted on wells #2, 3 and 4. Wells #2, #3, and #4 will

be used to source water for the existing 10,000 sf outdoor canopy and expansion of the outdoor canopy.

The Report does not estimate the aquifer storage capacity but does estimate the annual recharge rate during drought- and non-drought years. The Memorandum concludes that the recharge ranges from the 106.5-acre property is between 7.4 and 59 acre-feet during a drought year, and between 33.5 and 221.2 acre-feet during a non-drought year. Using a recharge value of 7.4 AFY to represent a drought year and 33.5 AFY to represent an average year, over the 106.4-acre parcel area, there is sufficient recharge to meet the project's irrigation demand, even during drought years.

The Hydrology Technical Memorandum concluded that this project was sustainable without impacting competing wells in the vicinity.

HYD-1: A Water Monitoring Program, including seasonal static water level monitoring and water level monitoring during extraction, shall be followed as described in the Hydrology Report prepared by NorthPoint Consulting Group, Inc., in April of 2023. The applicant shall maintain a record of all data collected and shall provide a report of the data collected to the County annually and/or upon made upon request.

Less Than Significant Impact with mitigation measure HYD-1 incorporated

- c) According to Lake County Ordinance Section 27.13 (at) 3, the Property Management Plan must have a section on Storm Water Management based on the requirements of the California Regional Water Quality Control Board Central Valley Region or the California Regional Water Quality Control Board North Coast Region, with the intent to protect the water quality of the surface water and the stormwater management systems managed by Lake County and to evaluate the impact on downstream property owners. All cultivation activities shall comply with the California State Water Board, the Central Valley Regional Water Quality Control Board, and the North Coast Region Water Quality Control Board orders, regulations, and procedures as appropriate.

The cultivation operation is enrolled in the State Water Resources Control Board's Order *WQ 2019-0001-DWQ General Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities* (General Order). Compliance with this Order will ensure that cultivation operations will not significantly impact water resources by using a combination of Best Management Practices, buffer zones, sediment and erosion controls, inspections and reporting, and regulatory oversight. A Stormwater and Erosion Control Plan is also being implemented as part of the Property Management Plan.

According to the Stormwater and Erosion Control Plan, the cultivation operations are not expected to alter the hydrology of the parcels significantly, and an engineered Erosion Control Plan has been submitted. Establishment of the cultivation operations will require some grading for the construction of new buildings and roadway improvements. Construction of the Processing Facility and 2,500 square foot barn for indoor cultivation operations will require building permits and be required to adhere to the California Building Code standards for commercial facilities. A grading permit will be obtained for approximately 450 cubic yards of earthwork for ground preparation of cultivation areas and building pad preparation. In addition to significantly exceeding all setback requirements, vegetative buffers exist between the cultivation area and the nearest water resource. These vegetated areas will be preserved.

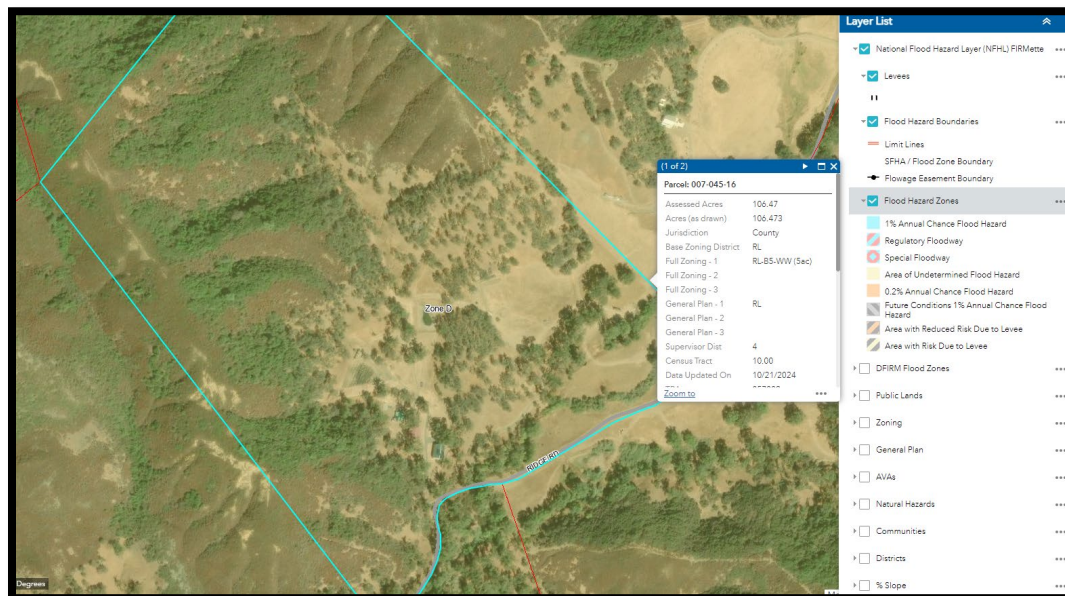
Best Practical Treatment or Control (BPTC) measures will be deployed in a sequence to follow the progress of site preparation, tilling, and cultivation. As the locations of soil disturbance change, erosion and sedimentation controls would be adjusted accordingly to control stormwater runoff at the downgrade perimeter and drain inlets. BPTCs to be implemented include monitoring weather to track conditions and alert crews to the onset of rainfall events, stabilizing disturbed soils with temporary erosion control or with permanent erosion control as soon as possible after grading or construction is completed, and establishing temporary or permanent erosion control measures prior to rain events. The BMPs include the placement of straw, mulch, seeding, straw wattles, silt fencing, and planting of native vegetation on all disturbed areas to prevent erosion.

Due to the natural conditions of the Project site and with these erosion best practices, the project will not result in substantial erosion or siltation on-site or off-site; will not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or offsite; will not 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; and will not impede or redirect flood flows.

Less than Significant Impact with migration measure GEO-1 through GEO 4 incorporated

- d) The Project site is not located in an area of potential inundation by seiche or tsunami. The project site is located in Flood Zone D (undetermined) – not in a special flood hazard area. The type 247 soil on the cultivation site portion of the parcels is not overly susceptible to erosion, and soils at the project site are relatively flat and stable, with a minimal potential to induce mudflows.

FIGURE 11 –FLOOD ZONE D



Source: Lake County GIS portal

Less than Significant Impact

- e) Due to the former drought conditions, on July 27, 2021, the Lake County Board of Supervisors passed an Urgency Ordinance (Ordinance 3106) requiring land use applicants to provide enhanced water analysis during a declared drought emergency. Ordinance 3106 requires that all project that require a CEQA analysis of water use include the following items in a Hydrology Report prepared by a licensed professional experienced in water resources:
- Approximate amount of water available for the project's identified water source,
 - Approximate recharge rate for the project's identified water source, and
 - Cumulative impact of water use to surrounding areas due to the project

While the drought conditions have significantly changed and there is no longer a declared drought emergency, the Community Development Department will continue to require Hydrological Assessments (Hydrology Reports) for all land use permits in accordance to the Lake County Zoning Ordinance.

The project has provided a Drought Management Plan (DMP) as part of the requirements of Lake County Ordinance 3106, passed by the Board of Supervisors on July 27, 2021. The DMP illustrates how the applicant proposes to further reduce water use during a declared drought emergency and ensures both the success and decreased impacts to surrounding areas. The project also proposes water metering and conservation measures as part of the standard operating procedures, and these measures will be followed whether or not the region is in a drought emergency.

As part of the project's standard operational procedures, the project proposes implementing ongoing water monitoring and conservation measures that would reduce the overall use of water. These measures are included in the Water Use Management Plan (Section 15.2) as required by Article 27, Section 27.13 (at) 3 of the Lake County Zoning Ordinance. On-going water conservation measures include:

- No surface water diversion
- The selection of plant varieties that are suitable for the climate of the region
- The use of driplines and drip emitters rather than spray irrigation
- Covering drip lines with straw mulch or similar materials to reduce evaporation
- Using water application rates modified from data obtained from soil moisture meters and weather monitoring
- Utilizing shutoff valves on hoses and water pipes
- Daily visual inspections of irrigation systems
- Immediate repair of leaking or malfunctioning equipment
- Water-use metering and budgeting

A water budget will be created every year and water use efficiency from the previous year will be analyzed.

In addition to water use metering, water level monitoring is also required by Lake County Zoning Ordinance Article 27 Section 27.13 (at) 3, specifically that wells must have a meter to measure the amount of water pumped as well as a water level monitor. Well water level monitoring and reporting will be performed as follows:

Seasonal Static Water Level Monitoring

The purpose of seasonal monitoring of the water level in a well is to provide information regarding long-term groundwater elevation trends. The water level in each well will be measured and recorded once in the Spring (March or April), before cultivation activities begin, and once in the fall (October) after cultivation is complete, as the California Statewide Groundwater Monitoring Program (CASGEM) monitors semi-annually, around April 15 and October 15 of each year. Records shall be kept, and elevations reported to the County as part of the project's annual reporting requirements. Reporting shall include a hydrograph plot of all seasonal water level measurements, for all project wells, beginning with the initial measurements. Seasonal water level trends will aid in the evaluation of the recharge rate of the well. If the water level in a well measured during the Spring remains relatively constant from year to year, then the water source is likely recharging each year.

Water Level Monitoring During Extraction

The purpose of monitoring the water level in a well during extraction is to evaluate the performance of the well and determine the effect of the pumping rate on the water source during each cultivation season. This information will be used to determine the capacity and yield of the Project's wells and to aid the cultivators in determining pump rates and the need for water storage. The frequency of water level monitoring will depend on the source, the source's capacity, and the pumping rate. It is recommended that initially the water level be monitored twice per week or more, and that the frequency be adjusted as needed depending on the impact that the pumping rate has on the well water level. Records will be kept and elevations reported to the County as part of the project's annual performance reporting requirements. Reporting will include a hydrograph plot of the water level measurements for all project wells during the cultivation season and compared to prior seasons.

Measuring a water level in a well can be difficult and the level of difficulty will depend on site-specific conditions. As part of the well monitoring program, the well owner or operator will work with a well expert to determine the appropriate methodology and equipment to measure the water level, as well as who will conduct the recording and monitoring of the well level data. The methodology of the well monitoring program will be described and provided in the project's annual report.

In addition to monitoring and reporting, an analysis of the water level monitoring data will be provided and included in the project's annual report, demonstrating whether or not use of the project wells is causing significant drawdown and/or impacts to the surrounding area and what measures can be taken to reduce their impacts. If there are impacts, a revised Water Management Plan will be prepared and submitted to the County for review and approval, which demonstrates how the project will mitigate the impacts in the future.

Drought Emergency Water Conservation Measures

In addition to the above on-going water monitoring and conservation measures, during times of drought emergencies or water scarcity the project may implement the following additional measures as needed or appropriate to the site in order to reduce water use and ensure both the success and decreased impacts to surrounding areas:

- Cover the soil and drip-lines with removable plastic covers or similar to reduce evaporation
- Irrigate only in the early morning hours or ~~before~~ **after** sunset

- Cover plants with shaded meshes during peak summer heat to reduce plant water needs
- Use a growing medium that retains water in a way to conserve water and aid plant growth. Organic soil ingredients like peat moss, coco coir, compost and other substances like ~~perlite~~ and vermiculite retain water and provide a good environment for cannabis to grow
- Install additional water storage

In the event the wells cannot supply the water needed for the project, the following measures may be taken:

- Reduce the amount of cultivation and/or length of cultivation season. The amount of cultivation would be determined based on available water. Early crop harvest, if water becomes limited
- Install additional storage and/or implement a rainwater catchment system; and/or
- If possible, develop an alternative, legal, water source that meets the requirements of Lake County Codes and Ordinances.

The following mitigation measure will be implemented which would reduce the impacts to less than significant:

HYD-2: The applicant shall adhere to the measures described in the Drought Management Plan during periods of a declared drought emergency.

Less Than Significant Impact with mitigation measures GEO-1 through GEO-4 and HYD-1 through HYD-2 incorporated.

XI. LAND USE PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
Would the project:				
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?	☐	☐	☒	☐

Discussion:

- a) The project site consists of 106 acres of minimally developed land in the Kelseyville Planning Area. The closest community growth boundary accessible by road is Lakeport, which is approximately 4 miles northeast of the subject site. The area is characterized by large parcels, mostly over 100 acres each, of rural, marginally developed and undeveloped land. The project does not include construction of new roads or linear features that would result in the division of an established community.

No Impact

- b) The General Plan Land Use designation and Zoning District designation currently assigned to the Project site is Rural Land ("RL"). The Lake County Zoning Ordinance allows for commercial outdoor cannabis cultivation in the "RL" land use zone with a major use permit. No Scenic Combining Districts are designated onsite. There are no specific policies related to commercial cannabis cultivation within the General Plan or Kelseyville Area Plan.

Less than Significant Impact

XII. MINERAL RESOURCES

Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
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Would the project:

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

Discussion:

- a) The Lake County Aggregate Resource Management Plan does not identify the portion of the Project parcel planned for cultivation as having an important source of aggregate resources. According to the California Department of Conservation, Mineral Land Classification, there are no known mineral resources on the project site.

No Impact

- b) According to the California Geological Survey's Aggregate Availability Map, the Project site is not within the vicinity of a site being used for aggregate production. In addition, the site was not delineated on the County of Lake's General Plan, the Kelseyville Area Plan nor the Lake County Aggregate Resource Management Plan as a mineral resource site. Therefore, the project has no potential to result in the loss of availability of a local mineral resource recovery site.

No Impact

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
Would the project:				
a) Result in the 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) Result in the generation of excessive ground-borne vibration or ground-borne noise levels?	☐	☐	☒	☐
c) Result in the generation of excessive ground-borne vibration or ground-borne noise levels?	☐	☐	☐	☒

Discussion:

- a) Noise related to outdoor cannabis cultivation typically occurs either during construction, or as the result of machinery related to post construction equipment such as well pumps or emergency backup generators during power outages. Energy will be supplied by grid power and supplemented by roof mount solar on the processing building.

In regard to the Lake County General Plan Chapter 8 - Noise, the closest off-site residence is over 600 feet from the site. Noise is not expected to exceed the 55 dBA during daytime hours (7:00 a.m. – 10:00 p.m.) or 45 dBA during night hours (10:00 p.m. – 7:00 a.m.) when measured at the property line. For Stage II of development, construction activities are anticipated to last approximately two months. Construction hours and days are limited to Monday through Friday, 7:00 a.m. to 6:00 p.m., and Saturday from noon to 5:00 p.m. which is considered temporary in nature and is consistent with the noise level established in the General Plan, Chapter 8. As such, the project would not result in a significant increase in ambient noise levels. Operational noise is consistent with general agricultural operations.

The following mitigation measures will be implemented to ensure noise-related impacts are reduced to less than significant:

NOI-1: All construction activities including engine warm-up shall be limited Monday through Friday, between the hours of 7:00 a.m. and 7:00 p.m., and Saturdays from 12:00 noon to 5:00 p.m. to minimize noise impacts on nearby residents. Back-up beepers shall be adjusted to the lowest allowable levels. This mitigation does not apply to night work.

NOI-2: Maximum non-construction related sounds levels shall not exceed levels of 55 dBA between the hours of 7:00 a.m. to 10:00 p.m. and 45 dBA between the hours of 10:00 p.m. to 7:00 a.m. within residential areas as specified within Zoning Ordinance Section 21-41.11 (Table 11.1) at the property lines.

Less than Significant Impact with Mitigation Measures NOI-1 and NOI-2 incorporated.

- b) Under existing conditions, there are no known sources of ground-borne vibration or noise that affect the project site such as railroad lines or truck routes. Therefore, the Project would not create any exposure to substantial ground-borne vibration or noise.

The project would not generate ground-borne vibration or noise, except potentially during the construction stage from the use of heavy construction equipment. There will be grading required for the building pads, however earth movement is not expected to generate ground-borne vibration or noise levels. According to California Department of Transportation's Transportation and Construction-Induced Vibration Guidance Manual, ground-borne vibration from heavy construction equipment does not create vibration amplitudes that could cause structural damage, when measured at a distance of 10 feet. The nearest existing off-site structures are located 600 feet from the nearest point of construction activities and would not be exposed to substantial ground-borne vibration due to the operation of heavy construction equipment on the Project site.

Furthermore, the project is not expected to employ any pile driving, rock blasting, or rock crushing equipment during construction activities, which are the primary sources of ground-borne noise and vibration during construction. As such, impacts from ground-borne vibration and noise during near-term construction would be less than significant.

Less Than Significant Impact

- c) The project site is located approximately three miles from Lampson Field, administered by the Lake County Airport Land Use Commission, which has not adopted an Airport Land Use Compatibility Plan. The site is not located in the "AA" Airport Approach Combining District. Therefore, no impact is anticipated.

No Impact

XIV. POPULATION AND HOUSING

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

Discussion:

- a) The project is not anticipated to induce significant population growth to the area. The increased employment will be up to two full-time employees to be hired locally with up to four employees at planting and harvest peak season.

No Impact

- b) The project will not displace any existing housing, thus no impact is expected.

No Impact

XV. PUBLIC SERVICES

Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
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Would the project:

- a) 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:

☐	☐	☒	☐
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- 1) Fire Protection?
- 2) Police Protection?
- 3) Schools?
- 4) Parks?
- 5) Other Public Facilities?

Discussion:

Public services include fire protection provided by the Lakeport County Fire District and CalFire, water supply provided from existing private wells, sewage disposal as provided through the existing septic tank and leach field area, and police protection as provided by the Lake County Sheriff's Department. These public and private services will continue to be available to the subject site and will be adequate to serve the proposed cannabis cultivation facilities as further described below. As such, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered government facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objects for any of the public services.

1) Fire Protection

The Lakeport Fire Protection District and CALFIRE provide fire protection services to the proposed project area. Development of the proposed project would impact fire protection services by increasing the demand on existing County Fire District resources. Comments and input from the Lakeport Fire Protection District regarding site improvements and enhanced emergency services have been addressed and incorporated into the updated site plans dated September 2024 and March 2025. To offset the increased demand for fire protection services, the proposed project includes minimum of fire safety and support fire suppression activities and installations, including compliance with State and local fire codes, and shall maintain minimum private water supply reserves for emergency fire use. With these measures in place, the project would have a less than significant impact on fire protection.

2) Police Protection

The Project site falls under the jurisdiction of the Lake County Sheriff's Department. Article 27 of the Lake County Zoning Ordinance lays out specific guidelines for security measures for commercial cannabis cultivation to prevent access of the site by unauthorized personnel and protect the physical safety of employees. This includes 1) establishing a physical barrier to secure the perimeter access and all points of entry; 2) installing a security alarm system to notify and record incident(s) where physical barriers have been breached; 3) establishing an identification and sign-in/sign-out procedure for authorized personnel, suppliers, and/or visitors; 4) maintaining the premises such that visibility and security monitoring of the premises is possible; and 5) establishing procedures for the investigation of suspicious activities. Accidents or crime emergency incidents during operation are expected to be infrequent and minor in nature, and with these measures the impact is expected to be less than significant.

3) Schools

The proposed project is not expected to increase the population in the local area and would not place greater demand on the existing public school system by generating additional students. No impacts are expected.

4) Parks

The proposed project will not increase the use of existing public park facilities and would not require the modification of existing parks or modification of new park facilities offsite. No impacts are expected.

5) Other Public Facilities

As the staff will be hired locally, no increase in impacts is expected.

Less than Significant Impact

XVI. RECREATION

Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
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Would the project:

- a) 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?

☐	☐	☐	☒
☐	☐	☐	☒

Discussion:

- a) The staff will be hired locally, there will be no increase in the use of existing neighborhood and regional parks or other recreational facilities that would be the direct result of this project, and no impacts are expected.

No Impact

- b) The proposed project does not include any recreational facilities and will not require the construction or expansion of existing recreational facilities, and no impacts are expected.

No Impact

XVII. TRANSPORTATION

Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
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Would the project:

- a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?
- b) For a land use project, would the project conflict with or be inconsistent with CEQA guidelines section 15064.3, subdivision (b)(1)?
- c) For a transportation project, would the project conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(2)?
- d) Substantially increase hazards due to geometric design features (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

☐	☐	☒	☐
☐	☐	☒	☐
☐	☐	☐	☒
☐	☐	☒	☐

e) Result in inadequate emergency access?

☐☐☒☐

1, 3, 4, 5,
9, 20, 22,
27, 28, 35

Discussion:

The subject site is located on the northwest side of Ridge Road which is identified in the Lake County General Plan as a local road. Chapter 6 of the Lake County General Plan – the Transportation and Circulation Element indicates that local roads feed into minor collectors and community travel routes and collectors of traffic from local roads providing access to higher density residential areas, local commercial facilities, neighborhood parks and schools.

The subject site is provided with two road-based driveway access points from Ridge Road into existing parking areas. Roadway signing and speed limit signs have been posted on Ridge Road in accordance with County standards. Highland Springs Road, a County owned and designated arterial road, extends west of the Highland Springs reservoir to the Mendocino County line. Highland Springs Road is also known as the Old Hopland Toll Road and has been in existence for over a century. Highland Springs Road is public right-of-way owned and maintained by the County of Lake Public Works Department. Highland Springs Road extends through several large parcels of land that are owned by the County of Lake.

a) Roadway Analysis

The project is located on Ridge Road, an unmaintained county road. Vehicles traveling to the site will use Highland Springs Road to Ridge Road to access the project site. There are two locked gates leading to the site that will need to have Knox-boxes installed to enable emergency vehicles to enter the site.

Ridge Road was evaluated for Public Resource Code (PRC) compliance and was found to be compliant with the addition of several turn-arounds for emergency vehicle use, and installation of a 22' wide gate. The interior driveway has 6" of gravel base that is needed to support a 75,000 pound emergency vehicle, typically a long engine or truck hauling a bulldozer. As proposed, the interior driveway meets California PRC 4290 and 4291 road standards for fire equipment access for current facilities. Interior roadway improvements are required for the development of the new facilities.

The proposed project does not conflict with any existing program plan, ordinance or policy addressing roadway circulation, including the Lake County General Plan Chapter 6 – Transportation and Circulation, and a less than significant impact on road maintenance is expected.

Transit Analysis

The Lake County Transit Authority Route 1 – North Shore, Clearlake to Lakeport, runs along California State Highway 29, with several transit stops in Lakeport, approximately four miles from the cultivation site. This distance would make the use of public transit unlikely.

Bicycle Lane and Pedestrian Path Analysis

The proposed Project does not conflict with any existing program plan, ordinance or policy addressing bicycle and/or pedestrian issues, including Chapter 6 of the General Plan. Ridge Road, and to a lesser extent Highland Springs Road are not intended for pedestrian or bicycle use due to width and lack of defined shoulders.

Less than Significant Impact

- b) State CEQA Guidelines Section 15064.3, Subdivision (b) states that for land use projects, transportation impacts are to be measured by evaluating the proposed Project's vehicle miles traveled (VMT), as follows:

"Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact."

To date, the County has not yet formally adopted its transportation significance thresholds or its transportation impact analysis procedures. As a result, the project-related VMT impacts were assessed based on guidelines described by the California Office of Planning and Research (OPR) in the publication *Transportation Impacts (SB 743) CEQA Guidelines Update and Technical Advisory*, 2018.

The OPR Technical Advisory identifies several criteria that may be used to identify certain types of projects that are unlikely to have a significant VMT impact and can be "screened" from further analysis. One of these screening criteria pertains to small projects, which OPR defines as those generating fewer than 110 new vehicle trips per day on average.

OPR specifies that VMT should be based on a typical weekday and averaged over the course of the year to take into consideration seasonal fluctuations. Up to three full-time employees are proposed with an increase of six trips proposed per day. Up to four employees are proposed during peak planting and harvest season with an increase of eight trips proposed per day.

Construction duration is anticipated for three months, Monday through Saturday. Up to three employees are proposed at construction. The County estimates that six daily trips (two arriving, two departing) will result from three employees during construction for a total of approximately 432 total employee trips in addition to up to 14 delivery trips during construction for a total of 446 trips during construction.

The proposed Project would not generate or attract more than the threshold of 110 trips per day, and therefore it is not expected for the Project to have a potentially significant level of VMT. Impacts related to CEQA Guidelines section 15064.3, subdivision (b) would be less than significant.

Less than Significant Impact

- c) The Project is not a transportation project. The proposed use will not conflict with and/or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)(2).

No Impact

- d) The Project site's interior driveway meets California PRC 4290 and 4291 road standards for fire equipment access for current facilities. Interior roadway improvements are required for the Stage II of development to the new facilities. The project does not result in the introduction of any obstacles, nor does it involve incompatible uses that could increase traffic hazards. Up to two full-time employees are proposed with an increase of four trips proposed per day. Up to four employees are proposed during peak planting and harvest season.

Less than significant impact

- e) The proposed project would not alter the physical configuration of the existing roadway network serving the area and will have no effect on access to local streets or adjacent uses (including access for emergency vehicles). Internal gates and roadways will meet CALFIRE requirements for vehicle access according to PRC 4290 and 4291, including adequate width requirements, overhead clearances, on-site turn-arounds, and sufficient base materials use. Furthermore, as noted above under impact discussion (a), increased project-related operational traffic would be minimal. The proposed project would not inhibit the ability of local roadways to accommodate emergency response and evacuation activities. The proposed project would not interfere with the City's adopted emergency response plan.

Less than Significant Impact

XVIII. TRIBAL CULTURAL RESOURCES

Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
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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:

- a) 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)?
- b) 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, the lead agency shall consider the significance of the resource to a California Native American tribe?

☐	☒	☐	☐
☐	☒	☐	☐

Discussion:

- a) A Cultural Resources Assessment with intensive pedestrian surveys of the Project site was prepared by Natural Investigations, Inc., and dated March 2020. No items of significance were identified. Based on the findings of this assessment, there is no indication that the Project will impact any historical resources as defined under CEQA Section 15064.5, unique archaeological resources as defined under CEQA Section 21083.2(g), or tribal cultural resources as defined under Public Resources Code Section 21074. For these reasons, no further cultural resources work was recommended. An inquiry to the California Historical Resources Information System (CHRIS) was sent on June 7, 2024, for the Project Property. CHRIS recommended the lead agency contact the local Native American tribe(s) regarding traditional, cultural, and religious heritage values.

Notification of the project and offering consultation under AB-52 was sent to Big Valley Rancheria, Cortina Rancheria, Elem Colony, Hopland Band of Pomo Indians, Koi Nation, Mishewal-Wappo, Middletown Rancheria, Redwood Valley Rancheria, Robinson Rancheria, Scotts Valley Band of Pomo Indians, Habematolel Pomo of Upper Lake Tribe, and Yocha Dehe Wintun Nation on December 1, 2023, and June 7, 2024, by the County of Lake. Of the notified Tribes, the Habematolel Pomo of Upper Lake Tribe and Yocha Dehe Wintun Nation both responded to the notice and deferred to Big Valley Band of Pomo Indians. The Community Development Department has not received an AB 52 Tribal Consultation request for this Project.

It is possible, but unlikely, that significant artifacts or human remains could be discovered during Project construction. If, however, significant artifacts or human remains of any type are encountered it is recommended that the project sponsor contact the culturally affiliated tribe and a qualified archaeologist to assess the situation. The Sheriff's Department must also be contacted if any human remains are encountered. This is required by previously approved commercial cannabis use permits MUP 19-15 and MUP 22-11 conditions of approval. The following mitigation measures will be implemented which would reduce the impacts to less than significant:

Less than Significant Impact with mitigation measures CUL-1 through CUL-3, TCR-1 and TCR-2 implemented.

- b) The California Historical Resources Information System records search showed the presence of one tribal cultural resources on the project site. The Assessment however generally resulted in negative findings following an on-site survey in and around the cultivation area portions of the site. The lead agency has determined that, in its discretion and supported by substantial evidence, no resources pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1 will be affected by the proposed project because the sensitive site is located outside the cultivation area boundary. The following mitigation measures will be implemented which would reduce the impacts to less than significant:

TCR-1: All on-site personnel of the project shall receive Tribal Cultural Resource Sensitivity Training prior to initiation of ground disturbance activities on the project. The training must be according to the standards of the NAHC or the culturally affiliated Tribe(s). Training shall address the potential for exposing subsurface resources and procedures if a potential resource is identified. The training shall also provide a process for notification of discoveries to culturally affiliated Tribes, protection, treatment, care and handling of tribal cultural resources discovered

or disturbed during ground disturbance activities of the Project. Confirmation of training shall be sent to the Community Development Department prior to commencement of cultivation activities.

TCR-2: If previously unidentified Tribal Cultural Resources are encountered during the project altering the materials and their stratigraphic context shall be avoided, and work shall halt immediately. Project personnel shall not collect, move, or disturb cultural resources. A representative from a locally affiliated Tribe(s) shall be contacted to evaluate the resource and prepare a Tribal Cultural Resources plan to allow for identification and further evaluation in determining the Tribal Cultural Resource significance and appropriate treatment or disposition.

Less than Significant Impact with mitigation measures CUL-1 and CUL-3, 2, TRC-1 and TCR-2 implemented.

XIX. UTILITIES

	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water 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 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?	☐	☐	☒	☐

Discussion:

- a) The proposed project will be served by four existing onsite irrigation wells and is proposing on-grid power for an electrical upgrade consisting of a total of 600 amps (400 amps are existing). The Property has electricity provided by PG&E. The proposed project is primarily full sun/outdoor cultivation operations. For each cultivation operation, a small solar-powered electrical system may be installed to power low voltage items such as security cameras, and water pumps for drawing groundwater and mixing liquid fertilizers into the irrigation systems. All buildings for indoor cultivation must comply with the Building Energy Efficiency Standards according to Title 24, Part 6 of California Code of Regulation. Energy compliance documentation is typically required at the building permit application phase. There is an existing ADA compliant portable toilet and handwashing station that will be used on the project site. Stage II of development include the construction of a processing facility equipped with an ADA restroom facility. A septic tank will be installed at this location in compliance with Lake County environmental Health requirements and standards.

The Project will not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental impacts.

Less than Significant Impact

- b) The subject parcel is served by three existing wells as described in the Hydrology Study and submitted with the Use Permit application, and the cultivation operation is enrolled as a Tier II / Low Risk cultivation operation in the State Water Resources Control Board's *Order WQ 2017-0023-DWQ General Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities* (General Order). Compliance with this Order will ensure that cultivation operations will not significantly impact water resources by using a combination of BPTC measures for water conservation, including shut-off valves on water tanks, drip irrigation, continued maintenance of equipment, in addition to buffer zones, sediment and erosion controls, inspections and reporting, and regulatory oversight.

Less than Significant Impact with Mitigation Measures HYD-1 through HYD-4 implemented.

- c) The project will rely on the use of portable toilets and hand washing station for cultivation operations during Stage I of development. Stage II of development includes construction of the processing facility equipped with ADA restroom facilities that may require a new or expanded septic system installation. There is an existing septic system on site that was installed during the new home construction in 2019. The Project was referred to the Lake County Division of Environmental Health on November 30, 2023, and June 7, 2024. On January 3, 2024, a comment was received includes the requirements for a new septic tank permit prior to installation.

Less than Significant Impact

- d) The existing landfill has sufficient capacity to accommodate the project's solid waste disposal needs. Estimated annual solid waste will be between 500 and 1000 pounds.

Waste will be transported to a licensed facility by cultivation operation staff using personal vehicles or be hauled by a private waste-hauling contractor, such as Waste Management, Inc., or C & S Waste Solutions. The licensed waste-hauler that is used at this facility is Lake County Waste Solutions. The Lake County Integrated Waste Management facilities include the following:

- Eastlake Landfill, 16015 Davis Ave, Clearlake
- Lake County Waste Solutions Transfer Station and Recycling Center, 230 Soda Bay Road, Lakeport
- South Lake Refuse and Recycling Center, 16015 Davis Street, Clearlake
- Quackenbush Mountain Resource Recovery and Compost Facility, 16520 Davis Street, Clearlake

Eastlake Landfill, South Lake Refuse Center, and Quackenbush Mountain Resource Recovery and Compost Facility are located within reasonable proximity of the Project site. As of 2019, the Eastlake Landfill had 659,200 cubic yards available for solid waste, with an additional 481,000 cubic yards approved in 2020.

The project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure.

Less than Significant Impact

- e) The project will be in compliance with federal, state, and local management and reduction statutes and regulations related to solid waste.

Less than Significant Impact

XX. 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 Measures	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Would the project, 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?	☐	☒	☐	☐

Discussion:

- a) The project will not further impair an adopted emergency response plan or evacuation plan. The applicant will adhere to all regulation of California Code Regulations Title 14, Division 1.5, Chapter 7, Subchapter 2, and Article 1 through 5 shall apply to this project; and all regulations of California Building Code, Chapter 7A, Section 701A, 701A.3.2.A.

In April 2020, Lake County Planning and Building Division staff conducted a PRC 4290 and 4291 site inspection and determined that the site could be accessed by emergency vehicles, and that the on-site driveway met PRC 4290 and 4291 standards with the addition of a wider gate and several on-site vehicle turn-arounds for emergency vehicle use. As proposed, the interior driveway meets California PRC 4290 and 4291 road standards for fire equipment access for current facilities. Interior roadway improvements are required for the development of the new facilities.

Comments and input from the Lakeport County Fire Protection District regarding site improvements and enhanced emergency services have been addressed and are as noted on the updated site plans dated September 2024 and March 2025.

Less than Significant Impact

- b) The Project site is within a high risk fire hazard zone, and the overall parcel boundary is considerably sloped, despite the project site being relatively flat. The cultivation area does not further exacerbate the risk of wildfire, however certain mitigation measures are necessary in the event of a wildfire on or near the site. The project site has improved fire access and maintaining the roadway in a manner that it meets PRC 4290 compliance regulations. The applicant is already using a steel, fiberglass, or concrete 5,000 gallon water tank dedicated to fire suppression in addition to the additional proposed 5,000 gallon steel, fiberglass, or concrete tank. The following mitigation measures will be implemented which would reduce the impacts to less than significant

WDF-1: Prior to cultivation, the applicant shall schedule a site visit with the Building Official or designee to verify that the roads, gates, and sites are PRC 4290 compliant.

WDF-2: The applicant shall maintain 100' of defensible space around all buildings associated with the cannabis project for the life of the project. Tree removal is not required; however, trees shall be limbed up to a height of 8 feet to prevent ladder combustion in the event of a wildfire.

Less than Significant Impact with mitigation measures WDF-1 and WDF-2 incorporated.

- c) The proposed Project, as described in the application documents and confirmed through site visits to the property, would not exacerbate fire risk through the installation of maintenance of associated infrastructure. The proposed project will require maintenance to meet and/or maintain roadway and driveway standards. An existing steel 5,000 gallon fire suppression water tank is present at the cultivation site. The proposed Project, as described in the application documents and confirmed through site visits to the property, would not exacerbate fire risk through the installation and maintenance of associated infrastructure. The proposed Project will require maintenance to meet and/or maintain roadway and driveway standards. The following mitigation measures will be implemented which would reduce the impacts to less than significant:

WDF-3: Construction activities shall not take place during a red flag warning (per the local fire department and/or national weather service) and wind, temperature and relative humidity will be monitored in order to minimize the risk of wildfire. Scraping shall not occur on windy days that could increase the risk of wildfire spread should the equipment create a spark

WDF-4: Any vegetation removal or manipulation shall take place in the early morning hours before relative humidity drops below 30 percent.

Less than Significant Impact with mitigation measures WDF-1 through WDF-4 incorporated.

- d) There is little chance of increased risks associated with post-fire slope runoff, instability, or drainage changes based on the lack of site changes that would occur by the Project parcel.

The erosion mitigation measures and BMPs to be implemented will provide further stability on and around the Project site, and with no neighboring people or structures within range of downstream flooding or landslides, the impact will be less than significant.

Less than Significant Impact with Mitigation Measures GEO-1 through GEO-4 incorporated.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Measures	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 will cause substantial adverse effects on human beings, either directly or indirectly? ☐ ☒ ☐ ☐

Discussion:

- a) According to the biological and cultural studies conducted, the Wellness Ranch cannabis cultivation project does not 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 when mitigation measures are implemented.

All setbacks for watercourses will exceed local, state, and federal regulations to prevent significant impacts on water quality. With the implementation of mitigation measures described in the biological assessment and the Best Management Practices and other mitigation measures described throughout this initial study, the potential impact on important biological resources will be reduced to less than significant.

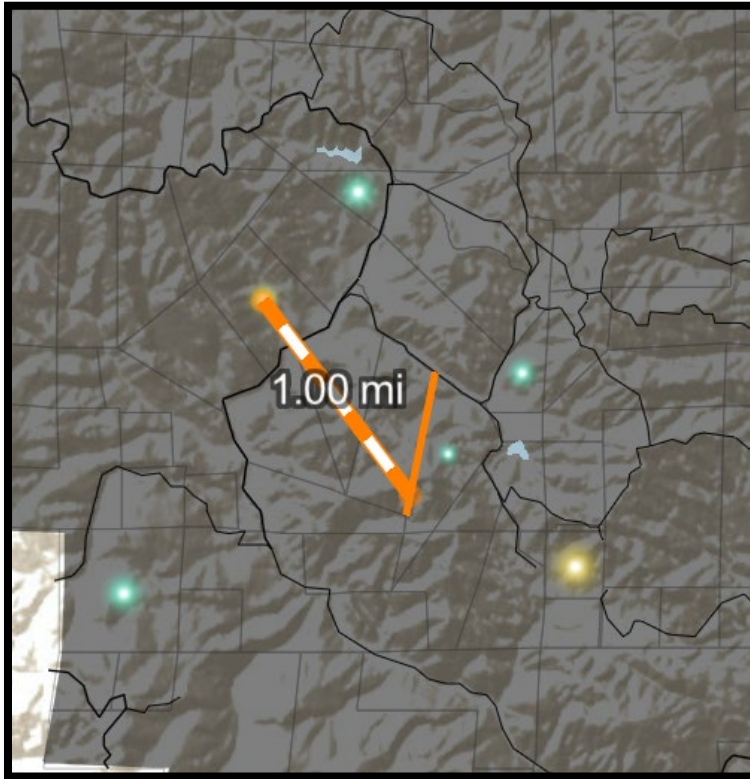
Less than significant with AES-1 through AES-3; AQ-1 through AQ-7; BIO-1 through BIO-2; CUL-1 through CUL-3; GEO-1 through GEO-7; HAZ-1 through HAZ-7; HYD-1 through HYD-2; NOI-1 through NOI-2; TCR-1 through TCR-2; WDF-1 through WDF-4 incorporated.

- b) Potentially significant impacts have been identified in relation to this project and include Air Quality, Cultural Resources, Noise, Tribal Cultural Resources and Wildfire. These impacts in combination with the impacts of other past, present, and reasonably foreseeable future projects could cumulatively contribute to significant effects on the environment.

Within one mile of the proposed project, there are zero pending and four approved projects; two approved permits exist at this location. Within three miles of the proposed project, there are zero pending and six approved projects; two approved permits exist at this location.

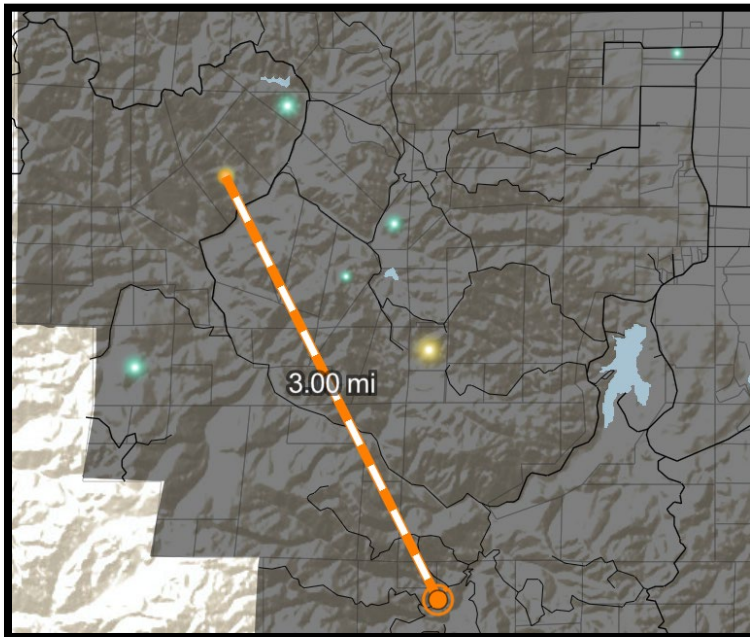
Cumulative Impacts associated with the project would be Less than significant with implementation of Mitigation Measures AES-1 through AES-3; AQ-1 through AQ-7; BIO-1 ~~through BIO-2~~; CUL-1 through CUL-3; GEO-1 through GEO-7; HAZ-1 through HAZ-7; HYD-1 through HYD-2; NOI-1 through NOI-2; TCR-1 through TCR-2; and WDF-1 through WDF-4 incorporated.

FIGURE 12– CUMULATIVE IMPACTS 1-MILE RADIUS



Source: Lake County GIS

FIGURE 13– CUMULATIVE IMPACTS 3-MILE RADIUS



Source: Lake County GIS

- c) The proposed project has potential to result in adverse indirect or direct effects on human beings. Aesthetics, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hazardous Material, Hydrology, Noise, Tribal Cultural Resources, and Wildfire have the potential to impact human beings. Implementation of and compliance with mitigation measures identified in each section as conditions of approval would not result in substantial adverse indirect or direct effects on human beings and impacts would be considered less than significant.

Less than significant with AES-1 through AES-3; AQ-1 through AQ-7; BIO-1 ~~through BIO-2;~~ CUL-1 ~~through~~ ~~and~~ CUL-3~~2~~; GEO-1 through GEO-7~~5~~; HAZ-1 through HAZ-7; HYD-1 through HYD-2; NOI-1 through NOI-2; TCR-1 through TCR-2; WDF-1 through WDF-4 incorporated.

Source List

1. Lake County General Plan
2. Lake County GIS Database
3. Lake County Zoning Ordinance
4. Kelseyville Area Plan
5. Wellness Ranch 3 Cannabis Cultivation Application – Major Use Permit.
6. U.S.G.S. Topographic Maps
7. U.S.D.A. Lake County Soil Survey
8. Lake County Important Farmland Map, California Department of Conservation Farmland Mapping and Monitoring Program
9. Department of Transportation's Scenic Highway Mapping Program, (<https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>)
10. Lake County GIS Serpentine Soil Mapping
11. California Natural Diversity Database (<https://wildlife.ca.gov/Data/CNDDDB>)
12. U.S. Fish and Wildlife Service National Wetlands Inventory
13. Biological Resources Assessment for Wellness Ranch II, prepared by Natural Investigations Inc., dated March 5, 2020, and updated October 13, 2023.
14. Cultural Resources Assessment, prepared by Natural Investigations Inc., dated March 2020.
15. California Historical Resource Information Systems (CHRIS); Northwest Information Center, Sonoma State University; Rohnert Park, CA.
16. Water Resources Division, Lake County Department of Public Works Wetlands Mapping.
17. U.S.G.S. Geologic Map and Structure Sections of the Clear Lake Volcanic, Northern California, Miscellaneous Investigation Series, 1995
18. Official Alquist-Priolo Earthquake Fault Zone maps for Lake County
19. Landslide Hazards in the Eastern Clear Lake Area, Lake County, California, Landslide Hazard Identification Map No. 16, California Department of Conservation, Division of Mines and Geology, DMG Open –File Report 89-27, 1990
20. Lake County Emergency Management Plan
21. Lake County Hazardous Waste Management Plan, adopted 1989
22. Lake County Airport Land Use Compatibility Plan, adopted 1992
23. California Department of Forestry and Fire Protection - Fire Hazard Mapping
24. National Pollution Discharge Elimination System (NPDES)
25. FEMA Flood Hazard Maps
26. Lake County Aggregate Resource Management Plan

27. Lake County Bicycle Plan
28. Lake County Transit for Bus Routes
29. Lake County Environmental Health Division
30. Lake County Grading Ordinance
31. Lake County Natural Hazard database
32. Lake County Countywide Integrated Waste Management Plan and Siting Element, 1996
33. Lake County Water Resources
34. Lake County Waste Management Department
35. California Department of Transportation (Caltrans)
36. Lake County Air Quality Management District website
37. Lakeport Fire Protection District
38. Site Visit – August 2019, 2022, 2023
39. United States Department of Agriculture – Natural Resources Conservation Service Web Soil Survey
40. Hazardous Waste and Substances Sites List,
41. State Water Resources Control Board (SWRCB) Cannabis Policy and General Order
42. Lake County Groundwater Management Plan, March 31st, 2006.
43. Lake County Rules and Regulations (LCF) for On-Site Sewage Disposal
44. Lake County Municipal Code: Sanitary Disposal of Sewage (Chapter 9: Health and Sanitation, Article III)