INITIAL STUDY and PROPOSED MITIGATED NEGATIVE DECLARATION

Green Beach Ventures LLC Conditional Use Permit Application

Hayfork, California

APN 017-010-80-00

Lead Agency:

Trinity County
Department of Planning
61 Airport Road
Weaverville, CA 96093

Technical Assistance by:

821 Main Street
P.O. Box 172
Weaverville, CA 96093

April 2021

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1.1 Introduction and Regulatory Guidance

This document is an Initial Study that summarizes the technical studies prepared for the proposed Green Beach Ventures, LLC, Conditional Use Permit (CUP) and provides justification for a Mitigated Negative Declaration (MND). This document has been prepared in accordance with the current California Environmental Quality Act (CEQA), Public Resources Code Section 21000 et seq., and the State CEQA Guidelines. The purpose of this document is to evaluate the potential environmental impacts of the proposed True North Family Farms, LLC Commercial Cannabis Conditional Use Permit project (hereafter referred to as the "Project" or "proposed project"). Mitigation measures have been proposed to avoid or minimize any significant impacts that were identified.

1.2 Lead Agency

The Lead Agency is the public agency with primary responsibility for implementing a proposed project. Accordingly, the Trinity County Planning Department (County) is the CEQA Lead Agency.

1.3 Purpose of the Initial Study

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

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

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

This Initial Study is a public information document that describes the proposed project, existing environmental setting at the Project site, and potential environmental impacts of construction and operation of the proposed project. It is intended to inform the public and decision-makers of the proposed project's potential

environmental impacts and to document the lead agency's compliance with CEQA and the State CEQA Guidelines.

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

1.4 Regulatory Background Related to Cannabis

State Regulatory Framework

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

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

MAUCRSA designates applicable responsibilities for oversight of cannabis commerce in California to several State agencies. The Bureau of Cannabis Control (BCC) is the lead agency in regulating commercial cannabis licenses for retailers, distributors, testing labs, and microbusinesses involved with medical and adult-use cannabis. CalCannabis Cultivation Licensing, a division of the California Department of Food and Agriculture (CDFA), licenses and regulates commercial cannabis cultivators and manages the State's "track-and-trace" system that tracks cannabis and its products from cultivation to sale. The Manufactured Cannabis Safety Branch of the California Department of Public Health (CDPH) is responsible for regulation of commercial cannabis manufacturing. In accordance with MAUCRSA, all three agencies have adopted emergency regulations related to their respective responsibilities, and all three have drafted permanent regulations that are currently undergoing the State rulemaking process.

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

Local Regulatory Framework

Trinity County occupies an area of about 2.053 million acres (3,208 square miles) in northwestern California. Of the total acreage, about 75% is owned and managed by federal agencies such as the U.S. Forest Service (USFS), the Bureau of Reclamation (BOR), and the Bureau of Land Management (BLM). The remaining lands

are mostly privately-owned properties under the land use authority of the County. Lands in private ownership are located mainly along the primary waterways and in adjacent valleys (Trinity County 2017).

Trinity County has a history as a cannabis-producing region. The County's geographic and climatic conditions, low population density, and availability of resource lands previously utilized for forestry and grazing have attracted an influx of individuals for the purpose of participating in cannabis activity (Trinity County Project Initial Study 2017). Since 2016, the County has issued approximately 425 cultivation licenses. As of 2018, there were approximately 310 active licensed sites and another 25 in the licensing process. It is estimated by Trinity County that more than 3,500 unpermitted cultivation operations exist on private land in the County, and 10-20 illegal trespass grows on public lands.

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

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

1.5 Incorporation by Reference

In accordance with Section 15150 of the State CEQA Guidelines to reduce the size of the report, the following documents are hereby incorporated by reference into this Initial Study and are available for public review at the Trinity County Planning Department. A brief synopsis of the scope and content of each of these documents is provided below.

Trinity County General Plan

The Trinity County General Plan (General Plan) is a long-range planning guide for growth and development for the County. The General Plan serves two basic purposes: 1) to identify the goals for the future physical, social, and economic development of the County; and 2) to describe and identify policies and actions adopted to attain those goals. The General Plan is a comprehensive document that addresses seven (7) mandatory elements/ issues in accordance with State law. These elements include Land Use, Housing, Circulation, Conservation, Open Space, Noise, and Public Safety. Other issues that affect the County, including Public Facilities and Services, Recreation, and Economic Development are addressed on a local level in the Douglas City, Hayfork, Junction City, Lewiston, and Weaverville Community Plans. The County's General Plan was utilized throughout this Initial Study as the fundamental planning document governing development on the proposed project site. Background information and policy information from the General Plan is cited in several sections of this Initial Study.

Hayfork Community Plan

The Hayfork Community Plan is the planning guideline for the future development of the area which establishes a framework for both private and public projects within the area to maintain the area's high quality of life. The plan was adopted in 1996 and addresses approximately 41.6 square miles (26,628 acres). The plan addresses nine (9) key issues including Population and Housing, Transportation, Public Services and Facilities, Parks and Recreation Facilities, Natural Resources, Hazards, Economic Development, and Land Use and Community Design. The plan was designed to implement the County General Plan while updating the General Plan relative to the community goals and objectives.

Trinity County Zoning Ordinance

The Trinity County Ordinance No. 315 established a Zoning Plan in an effort to promote and protect public health. The Zoning Plan serves three (3) basic purposes: 1) to assist in providing a definite plan of development for the County, and to guide, control and regulate the future growth of the County, in accordance with said plan; 2) to protect the character and the social and economic stability of agricultural, residential, commercial, industrial, and other areas, within the County and to assure the orderly and beneficial development of such areas; and 3) to minimize harm to public safety resulting from the location of buildings, and the uses thereof, and of land adjacent to highways which are a part of the Circulation Element of the General Plan, or which are important thoroughfares, in such manner as to cause interference with existing or prospective traffic movement on said highways. The Zoning Plan specified and established designations, locations and boundaries of zoning districts. The districts explicitly established permitted uses including building types, building heights, lot dimensions, yard dimensions, lot setbacks, lot coverage, allowable uses, density, and allowable accessory buildings and uses.

Trinity County Cannabis Cultivation Ordinance No. 315-823

Under the Ordinance No. 315, enacted on October 3, 2017, Trinity County enacted several ordinances that apply to various aspects of commercial cannabis cultivation. Initially Ordinance No. 315-823, subsequently amended, created regulations on commercial cannabis cultivation, including the designation of several zoning districts as appropriate locations for licensed cultivation without encumbrances. The Ordinance also identified exclusionary standards to indicate restrictions that would cause an application to not be approved.

Trinity County Cannabis Cultivation Ordinance No. 315-829

Under Ordinance No. 315-829, enacted on February 6, 2018, Trinity County amended Section 28 of the Zoning Ordinance No. 315 pertaining to commercial cannabis cultivation.

Trinity County Cannabis Cultivation Ordinance No. 315-830

Under Ordinance No. 315-830, enacted on March 6, 2018, Trinity County amended Section 28 of the Zoning Ordinance No. 315 pertaining to commercial cannabis cultivation. The amendment clarified allowable cultivation types and allowable simultaneous commercial cannabis activities.

Trinity County Cannabis Cultivation Ordinance No. 315-841

Under Ordinance No. 315-841, enacted on September 19, 2018, Trinity County amended Section 43 of the Zoning Ordinance No. 315 pertaining to commercial cannabis cultivation. The amendment clarified that a cultivator may "self-transport" their product without being required to obtain a County distribution permit.

Trinity County Cannabis Cultivation Ordinance No. 315-843

The Cannabis Ordinance No. 315-843, enacted on March 20, 2019, amended Section 43 of the Zoning Ordinance No. 315 pertaining to commercial cannabis cultivation. The amendment removed the requirement for an applicant to prove residency in the county for a minimum of one year as well as the limit of one application per person/ entity or legal parcel.

1.76 Review Process

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

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

Kimberly Hunter, Director of Building & Planning
khunter@trinitycounty.org
(530) 623-1351 ext. 2

2.1 Project Location and Setting

Regional Setting

The Project area lies within Trinity County, California in the Klamath Mountain Province. This region is at the junction of the uplifted Coast Ranges, the volcanic Cascades, and the ancient volcanic roots of the Sierra Nevada. The Trinity Basin is characterized by cold, wet winters and dry summers. The Trinity watershed drains into the Klamath River, which empties into the Pacific Ocean west of Trinity County. Several plant communities are present in the region, including Klamath mixed conifer, foothill pine (gray pine), mixed chaparral, montane hardwood, montane riparian, and riverine flora. In general, the growing season ranges from March 1 to October 31, but may be as short as mid-June through early September in some areas. Most herbaceous growth occurs during a relatively short period in late spring, ceasing as soil moisture depletes in early summer.

Local Setting

The proposed project is located approximately 5.61 air miles northeast of the community of Hayfork and 8.96 air miles southwest of Junction City up on a promontory above where Duncan Creek enters Carr Creek valley – a tributary of Hayfork Creek, which drains to the South Fork Trinity River at a confluence approximately 18.7 air miles to the northwest at the community of Hyampom. Historical onsite activities included some minor, selective timber harvest and agriculture. The subject parcel is bounded on all sides by similar agricultural and light commercial and industrial uses.

Project Location

The proposed Green Beach Ventures, LLC Conditional Use Permit Project ("Project", "proposed project") is located within Trinity County, northeast of central Hayfork. The Project site is located at 324 Frog Pond Lane, Hayfork, California. The 10.94-acre site is situated on rise above Duncan Creek valley, identified as Assessor Parcel Number (APN) 017-010-80. Primary site access is provided via the private, unimproved Frog Pond Lane from the public Summit Creek Road. The site is also identified on the Hayfork Summit USGS 7.5' quadrangle map, Section 2, Township 31 North, Range 11 West, Mount Diablo Base Meridian (MDBM). The location of the proposed project is shown on **Figure 2.0-1** with a site plan shown on **Figure 2.0-2**. The parcels immediately surrounding the Project are designated by the County's General Plan as Agricultural (A).

Existing Conditions

The land encompassing the Project area is located on a currently semi-developed disturbed hilltop which in the past has seen some minor selective logging and agricultural activities. The parcel falls under the Agricultural (A) General Plan designation and is zoned Agricultural 20-Acre minimum (A20). The site is surrounded by parcels are all of the same zoning and General Plan designations. The Project site is located well above and outside any designated floodplain. The parcel is surrounded by Agricultural-zoned properties in all directions, with neighboring properties consisting variously of cannabis cultivation farms, non-irrigated pastureland and other agriculture in the valley bottoms. The nearest neighboring residence to the parcel is 197 feet to the northeast.

The site currently has an existing residential dwelling and several outbuildings that serve as storage facilities and various other purposes (see **Figure 2-0.3**). Water is currently provided by two constructed and permitted onsite Power is provided by the Trinity Public Utilities District (TPUD).

2.2 Proposed Uses

The purpose of this Project is to develop the property to accommodate five licensed operations: (1) Adult-Use-Small Mixed-Light Tier 1 commercial license for the cultivation of up to 10,000 ft^2 of canopy; (2) a non-storefront retail business; (3) a nursery operation; (4) a distribution business; and (5) a Type 6 (non-volatile) manufacturing operation..

Related Zoning and Uses

The subject property has been zoned by the County as Agricultural 20-Acre minimum (A20), which allows for all agricultural uses, including crop and tree farming, livestock farming, dairies, animal husbandry, aviaries, and a single-family dwelling without the need for a Conditional Use Permit. The County Zoning Ordinance does allow for agricultural processing plants with a permit, and for all the other proposed project components the applicant is applying for a Conditional Use Permit, which is the purpose of this document in evaluating the potential environmental impacts of the proposed project.

Proposed Project Components

There are seven (7) proposed components of this Project, as described below:

1. The property is currently licensed to cultivate up to 10,000 square feet of mixed-light cannabis canopy. The current garden is located on the southwest portion of the property. Small tunnel-style primitive hoop houses are used to cultivate with light deprivation and the plants are accessed from the sides of these structures, not from within. Green Beach Ventures LLC (GBV, LLC) plans on transitioning to permanent, permitted greenhouses for their mature plant canopy. GBV houses its immature plants onsite. Moving forward, the immature plants will be housed within one (1) planned 3,500 ft^2 engineered and County-approved greenhouse. There is an area dedicated to composting of organic cannabis waste located to the northeast of the garden. A portion of a 24'x94' shop/garage is currently used for drying and processing the plants once harvested. In the future, the plants will be processed in three (3) separate shipping containers. Two (2) 10'x40' shipping containers will be used for drying and two (2) 10'x40' shipping containers will be used for processing.

2. The California Bureau of Cannabis Control (BCC), with Trinity County concurrence, has issued GBV, LLC a non-storefront retail license (C9-0000345-LIC). The initial premises will be located in a room in the shop/garage. In the future, this premises will be located in a 10'x20' shipping container.

3. The nursery will be housed in in one (1) 35'x100' year-round greenhouse.

4. The BCC has issued GBV, LLC a State self-distribution license. The proposed distribution facility will consist of one (1) 10'x40' shipping container.

5. GBV, LLC is proposing a Type 6 (non-volatile) manufacturing operation, which will be located in a 10'x20' shipping container.

6. A permitted dwelling is in the process of being built on the property. There is a permitted garage, septic system, and two (2) ponds onsite.

7. A rainwater catchment system will be designed and developed to harvest water from the building roofs. This water will be stored in tanks until a pond is developed in the northeast portion of the property.

Required Site Improvements (Construction Activities)

The proposed development activities will be infrastructure development in the southwestern section and a rainwater catchment pond in the northeast section of the property. To house the proposed licenses types, GBV will need to have ten (10) shipping containers delivered to the property for which GBV has already submitted a permit application for approval by the County as of August 2020. All containers will have permitted electricity. The manufacturing container will also have permitted plumbing. A new septic system will be installed to accommodate waste from this facility. There will be one (1) 10'x20' shipping container that will be dedicated solely for onsite miscellaneous storage.

Electrical lines will be extended underground to the new shipping containers and greenhouses.

Due to the site's gentle topography, grading and heavy equipment use in the infrastructure development zone will be minimal and will not require a Trinity County grading permit; however, an excavator will be used to construct the pond. Heavy equipment will be operated by a licensed contractor and construction will occur during the dry season (April 15 to October 15).

The pond will be constructed with less than a 1.5:1 slope, which will be compacted to a firm and unyielding surface. The pond will be lined with a clay liner. An emergency spillway and wildlife escape ramp will be included in the pond design. A grading permit will be obtained prior to construction of the pond.

Description of Project Operations

GBV is a family-run business. As the licenses are obtained, they expect to hire an additional two (2) to four (4) full-time employees, making the staff a total of eight (8). Additionally, it is anticipated that an additional four (4) seasonal employees will be hired May through October. Non-family employees will not live onsite.

Power is supplied by the Trinity Public Utility District (TPUD). There are two (2) three-phase power poles on the property and as previously stated the applicant is currently scheduling additional 400 amp/three phase power service. The applicant also plans to incorporate solar panels on the roofs of the barn and home.

This is not a hazardous materials site; there have been no legacy waste discharge issues identified onsite.

Petroleum products stored onsite in a 10'x12' dedicated shed are diesel and gasoline to fuel landscaping equipment and do not exceed three 15-gallon containers at any one time.

There is no hazardous waste generated at this site, nor would any be generated by proposed project operations. The only hazardous materials that are stored onsite are two gallons of 99% isopropyl ("rubbing") alcohol and two gallons of industrial-grade hydrogen peroxide. These are kept in the processing area, and are disposed of at the Hayfork Transfer Station solid waste facility.

Distribution

The distribution facility will have full climate control. Product will be stored in totes on shelves. The planned capacity is 1,500 to 2,000 pounds.

Nursery

The nursery facility will consist of one (1) 35'x100' engineered and County-approved year-round greenhouse for all immature plants, clones, and other non-mature-canopy agriculture purposes. There will also be one (1) 10'x40' shipping container dedicated for cultivation research and development purposes. Fertilizer would be stored in a 10'x12' shed onsite, and not exceed ten 50-pound bags at one time. The following tables describe the types of fertilizers, soil amendments, and pesticides used onsite.

Product	How Product is Used	Yards per 10,000 ft² of Canopy
Sphagnum Peat Moss	Soil Cover and Soil Retention	79.0
Malibu Compost-Bu's Blend	Compost	15.8
Mushroom Compost	Compost	15.8
Worm Castings	Compost	15.8
Ancient Forest Humic	Compost	15.8
Chicken Manure Compost	Compost	15.8
Small Black Lava Rock form Build-A-Soil	Soil Aeration	26.3
Rice Hulls	Soil Aeration	26.3
Pumice	Soil Aeration	26.3
Bio-Char	Soil Amenity	15.8
Azomite	Soil Amenity	2.3
Gypsum	Soil Amenity	2.3
Oyster Shell	Soil Amenity	2.3
Alfalfa Meal	Soil Amenity	0.66
Kelp Meal	Soil Amenity	2.3
Crab Meal	Soil Amenity	2.3
Fish Bone Meal	Soil Amenity	2.3

Seabird Guano	Soil Amenity	2.3
Fish Bio Live	Soil Amenity	0.66
Mycos	Soil Amenity	0.99
Malted Barley	Soil Amenity	1.32
Gro-Kashi	Soil Amenity	0.99
Neem – Granja Cake	Pest Control	2.30
Red Wigglers (Worms)	Bioturbation	20,000 ct.

Product	Amount	Active Ingredient	Considerations
Green Clean	2 Gallons	Soybean Oil (39%) and Sodium Lauryl Sulfate (19%) along with citric acid and isopropyl alcohol	for russet mites, spider mites, mealybugs, powdery mildew
Doctor Zymes Eliminator	1 Gallon	citric acid and other biologically stimulating ingredients	fungicide/miticide

Manufacturing

The manufacturing facility will consist of one (1) 10'x40' shipping container. GBV plans to manufacture bath bombs, lotions, balms, and edibles.

There are 12 security cameras situated throughout the entire property. All storage sheds and shipping containers have deadbolts, padlocks, and double-locking mechanisms.

Site Access

The property is accessed via Summit Creek Road and Frog Pond Lane. Frog Pond Lane has a native surface. It is a shared private road and is in need of maintenance. The interior access road has a rocked surface. There are approximately 400 feet (4,800 ft^2) of road on the property. The road is 12 feet wide and it has a 4% grade.

Water Availability

The water source for the farm is a surface diversion from an unnamed stream that fills two (2) permitted ponds. The ponds hold an estimated 370,000 gallons, cumulatively. There is a Small Irrigation Use Registration (SIUR) which allows them to store water for cannabis use. The SIUR Registration Number is H100243. Approximately 150,000 gallons are used annually for cannabis cultivation.

Water Diversion Statements have been filed for this property since 2015. The Statement Numbers are S024799 and S024800. The total estimated water use for both domestic and cultivation purposes is 250,000 gallons, annually.

Water conservation methods will include drip irrigation, keeping the plants small, covering the greenhouse with shade cloth, and using irrigation timers.

It is anticipated that annual water needs for additional license types are as follows:

- Nursery – 50,000 gallons
- Manufacturing – 25,000 gallons
- Distribution – 5,000 gallons

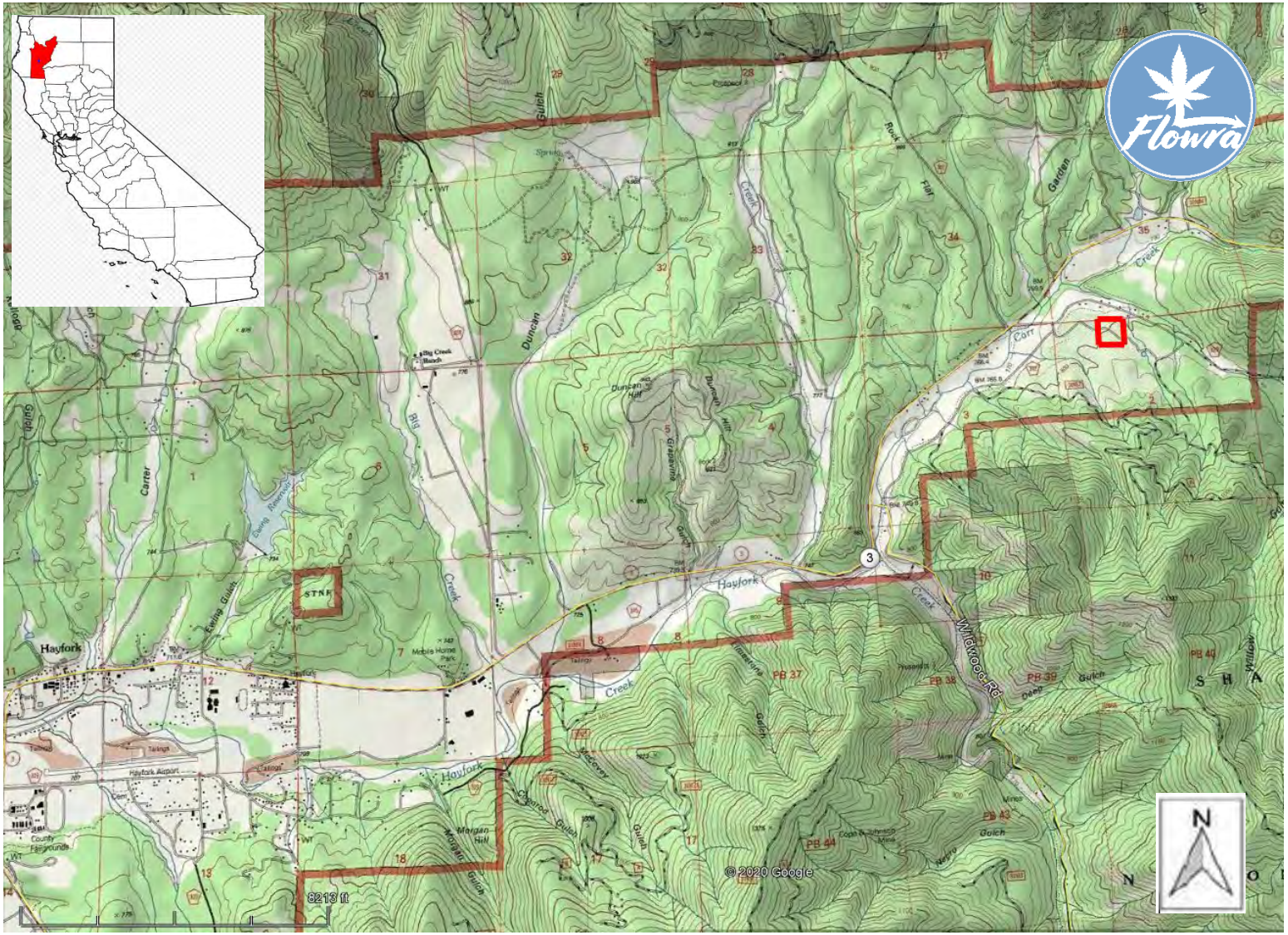
Engineered plans will be developed for a rainwater catchment pond in the northwest portion of the property. The pond slopes will be groomed to less than 1.5:1 slope and compacted to a firm and unyielding surface. Pond depth shall not exceed ten (10) feet. A wildlife ramp will be installed at no steeper than 20%. The overflow will have a rock armored spillway, to control overtopping and subsequent discharges into waters of the state. An impervious liner such as clay will be installed on the pond bottom. A grading permit will be required prior to digging the new off-stream pond.

If rainwater catchment is set up on the dwelling and the barn, it should yield approximately 75,000 gallons of water.

Domestic Wastewater Discharge

There is a permitted septic system onsite. A new septic system will be installed to accommodate waste from the manufacturing facility, which will have its own separate and permitted plumbing system.

Figure 1. Regional Location



Project Parcel

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Figure 2. Project Area Topography

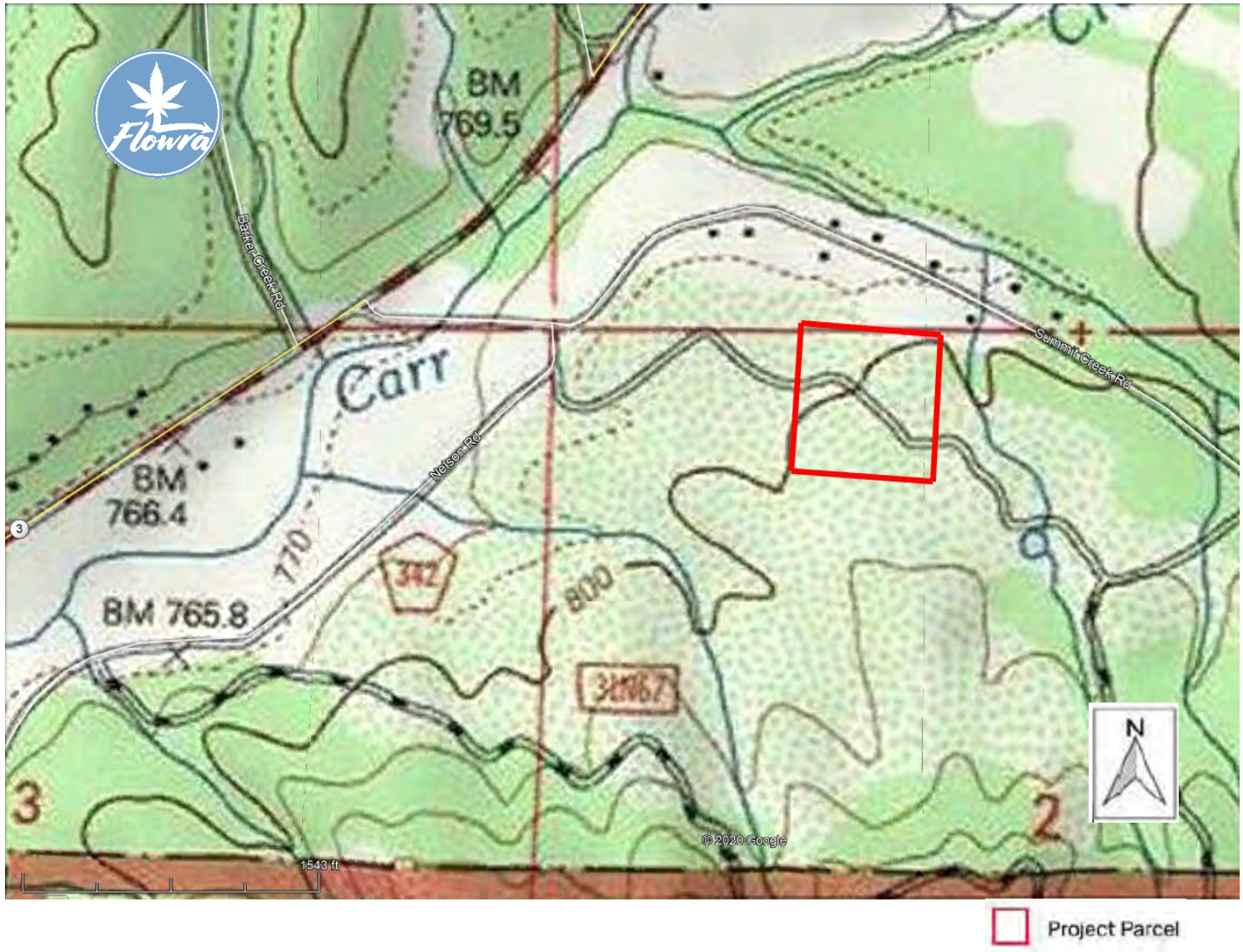

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Figure 3. Property Diagram

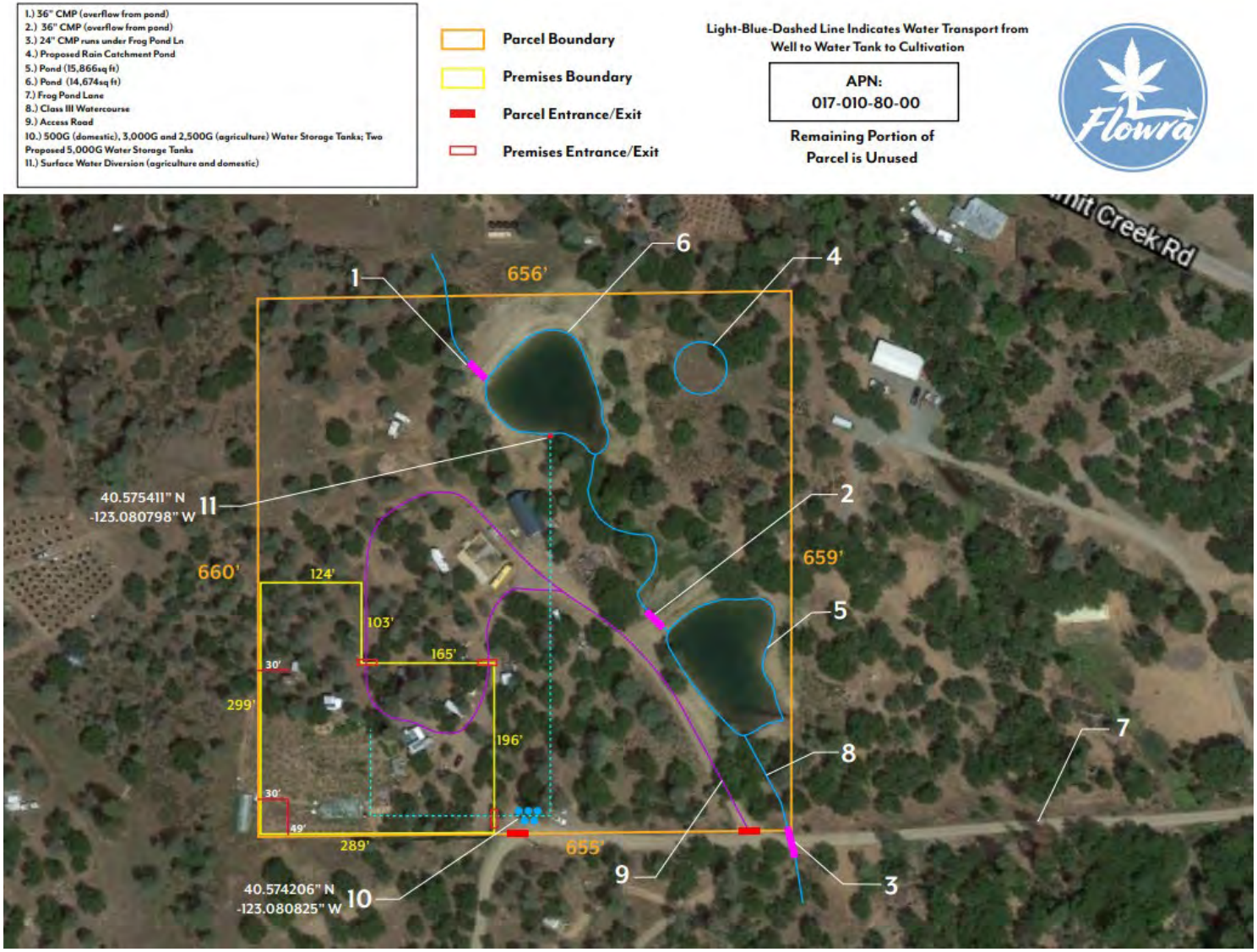

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Figure 4. Project Diagram

1.	**Project Title:**	Green Beach Ventures LLC Conditional Use Permit Application
2.	**Lead Agency Name and Address:**	Trinity County Department of Planning, 61 Airport Road, Weaverville, CA 96093
3.	**Contact Person and Phone Number:**	Kimberly Hunter, Director of Building & Planning, (530) 623-1351 ext. 2
4.	**Project Location:**	The Project is located at 324 Frog Pond Lane in Hayfork, California on Trinity County Assessor Parcel Number (APN) 017-010-80, approximately 10.95 acres in size. Refer to Figure 1 (Project Location) and Figures 2-3 for specific information on the Project location and activities.
5.	**Project Sponsor's Name and Address:**	Michael Herron, Green Beach Ventures, LLC, 324 Frog Pond Lane, Hayfork, CA 96041
6.	**General Plan Designation:**	Agricultural (A)
7.	**Zoning:**	Agricultural 20 Acre min (A20)

8. **Description of Project:**

The applicant is applying for Conditional Use Permit to develop the property to accommodate five licensed operations: (1) Adult-Use-Small Mixed-Light Tier 1 commercial license for the cultivation of up to 10,000 ft^2 of canopy; (2) a non-storefront retail business; (3) a nursery operation; (4) a distribution business; and (5) a Type 6 (non-volatile) manufacturing operation.

9. **Surrounding Land Uses and Setting:**

The parcel is surrounded by Agricultural-zoned properties in all directions, with neighboring properties consisting variously of cannabis cultivation farms, non-irrigated pastureland and other agriculture in the valley bottoms. The nearest neighboring residence is 197 feet to the northeast.

10. **Other Public Agencies Whose Approval is Required:**

Green Beach Ventures LLC ("GBV") is currently licensed with California Department of Food and Agriculture (CDFA/CalCannabis) (CCL19-0000752, exp.4/8/2021) and the Trinity County Planning Department (CCL- 317, exp. 5/29/2021) to cultivate up to 10,000 ft^2 of cannabis canopy. GBV has been issued a provisional non-storefront retail license (C9-0000345-LIC, exp. 3/23/2021) by the California Bureau of Cannabis Control (BCC), with Trinity County concurrence, and a provisional self-transportation license (C13-0000139-LIC, exp. 11/17/2021)– neither of which requires a Conditional Use Permit (CUP). This CUP application is for the nursery, distribution, and manufacturing licenses. The BCC has also issued GBV a provisional State self-distribution license (C13-20-0000099-REN). Other required permits that have been applied for and/or been issued include but are not limited to State Water Resources Control Board Notice of Applicability (WDID: 1_53CC403556), and CDFW Lake and Stream Bed Notification No. 1600-2015-0265-R1.

11. **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.?

Tribal consultation pursuant to AB 52 was initiated on May 12, 2019 with the Nor-Rel-Muk, Hupa, Redding Rancheria, Round Valley, and Wintu Tribes. Only one response was received from the Tribal Chairperson for the Nor-Rel-Muk tribe, indicating their tribe would like to be involved. No responses were received from the other entities requesting initiation of consultation under the provisions of AB 52.

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

Determination

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.

Signature	April 26, 2021 Date
Kim Hunter Printed Name	Trinity County Planning Department For

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 if 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 offsite as well as onsite, 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, 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 Environmental Impact Report (EIR) is required.
4. "Negative Declaration: Less than Significant with Mitigation Incorporated" applies when the incorporation of mitigation measures has reduced an effect from a "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 if, pursuant to 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 earlier analyses are available for review.
   b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c. Mitigation Measures. For effects that are "Less than Significant with Mitigation Incorporated," describe the mitigation measures that 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, when 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 a less-than-significant level.

I. Aesthetics	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Except as provided in Public Resources 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 along a scenic highway?	☐	☐	☐	☒
c. In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	☐	☐	☐	☒

Setting:

The Project site is surrounded by similar private properties with comparable land uses, including many already having various large industrial structures such as shops, garages and warehouses, immobilized recreational vehicles and trailers, outbuildings and scattered debris. The Project parcel itself –and notably the proposed Project area on the parcel – is situated topographically higher in altitude than all but one of the neighboring/adjacent parcels such that the Project site from is not directly visible to offsite viewers. The Project site is not adjacent to any historic sites, therefore the Project is unable to adversely affect a scenic resource (Trinity County GIS). The existing built environment in the vicinity of the proposed project includes both public and privately maintained access roads, scattered residential buildings, and a variety of associated rural structures. The proposed project site has the same general features as surrounding parcels, including an existing cannabis cultivation area and a variety of above and below ground utility services. The nearest residence (offsite) is located approximately 686 feet (0.13 mile) northeast of the Project area.

The County has not designated specific scenic vistas in the immediate Project area as a part of the General Plan and there are no designated State or federal scenic highways or scenic highway corridors in the vicinity of the Project (California Department of Transportation, California Scenic Highway Mapping System).

Discussion of Impacts:

a) *No Impact.* Scenic vistas are defined as expansive views of highly-valued landscapes from publicly accessible viewpoints. Scenic vistas include views of natural features such as topography, water courses, outcrops, and natural vegetation, as well as man-made scenic structures. There are very limited views of the site from the only public road near the Project (Summit Creek Road), and the

development is consistent with current uses. There are no designated scenic vistas in the Project vicinity; therefore, there would be no impact. Based on these factors, there will be no impact to visual resources from the development of the Project.

b) *No Impact.* The Project is not located along a state scenic highway.

c) *Less Than Significant Impact.* The visual character or quality of the area will be directly impacted following the removal of five Oregon oaks (*Quercus garryana*) with diameters at breast height (DBH) ranging from 11.4" to 16.9" and subsequent installation of 10 shipping containers (seven at 10'x40' and three at 10'x20'); however, careful consideration of the proposed placement of the shipping containers has allowed for retention of all oak trees with a 16" DBH or greater and/or those with noteworthy habitat value such as possessing a secondary cavity/basal hollow providing nesting or denning potential. Twelve such specimens in the proposed shipping container areas are to remain. Therefore, impacts to the visual character of the surrounding area or impacts to public views are considered less than significant.

d) *No Impact.* Light pollution occurs when nighttime views of the stars and sky are diminished by an over-abundance of light coming from the ground. Light pollution is a potential impact from the operation of any light source at night. Proper light shields, lighting design, and landscaping are commonly used to reduce light pollution generated from lighting by blocking the conveyance of light upwards. The result is that the lights are not visible from above; therefore, ambient light is not added to the nighttime sky. In addition, light reflecting off surfaces during daylight hours has the potential to create a source of glare in the vicinity of the proposed project.

The proposed project site currently has minimal uses that include minor amounts of nighttime light sources (residence, security lighting). These sources of light are limited and while they are generally seen from a distance as a small light source, do not generate large amounts of light either on or offsite; similarly, the generally developed nature of the surrounding area already has significant electric lighting. Introduction of new lighting from the proposed project will be employed within the shipping containers themselves and not outside and would not be considered a new source of substantial light or glare affecting either daytime or nighttime views in the area. The County Cannabis Cultivation ordinance (Ordinance No. 315-823 and amendments) requires that the light generated by the proposed project would be required to be both (1) downcast, shielded and/or screened to keep light from emanating offsite or into the sky, and (2) light uses for operations require that lighting in greenhouses is shielded so that little to no light escapes, and light shall not escape at a level that is visible from neighboring properties between sunset and sunrise. The proposed greenhouse will utilize blackout tarps for greenhouse light attenuation.

After evaluation of the proposed project, and the potential for impacts due to new lighting sources, the implementation of the standard requirements of the County's General Plan and Cannabis Cultivation Ordinance provide a uniform standard for reduction and minimization of light trespass. With adherence to applicable General Plan policies and provisions of the Cannabis Cultivation Ordinance impacts related to light pollution and glare impacts would be less than significant.

Mitigation Measures: No mitigation measures are required. Impacts would be less than significant.

Findings: In the course of the above evaluation, impacts associated with *Aesthetics* resources were found to be less than significant because of the inability of a project of this scope to create such impacts or the absence of project characteristics producing effects of this type.

References:

Caltrans (California Department of Transportation). 2020. "California Scenic Highway Mapping System." http://www.dot.ca.gov/hq/LandArch/scenic_highways/. Accessed: October 27, 2020.

———. "Article 2.5 of Chapter 2 of Division 1 of the California Streets & Highways Code". Sacramento: California Office of Legislative Counsel. http://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=SHC&division=1.&title=&part=&chapter=2.&article=2.5. Retrieved October 27, 2020.

———. "Officially Designated State Scenic Highways and Historic Parkways". Sacramento: California Department of Transportation. https://dot.ca.gov/-/media/dot-media/programs/design/documents/desig-and-eligible-aug2019_a11y.xlsx Retrieved October 27, 2020.

National Scenic Byways Program. 2020. https://www.fhwa.dot.gov/byways/states/CA. Accessed: October 27, 2019.

Trinity County. *General Plan Open Space and Conservation Element.*

———. *Cannabis Ordinance No. 315-823.* Enacted October 3, 2017.

II. Agriculture and Forestry Resources	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
In determining whether impacts on 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 on 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 the Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use or conflict with 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 that, 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?	☐	☐	☐	☒

Setting:

AGRICULTURAL RESOURCES

According to the California Department of Conservation, Farmland Mapping and Monitoring Program (FMMP), the Project site and surrounding areas are designated as *Urban and Built-up Land.* This designation is not considered an agricultural resource. Further, there are no Williamson Act contracted lands in the vicinity of the Project site.

FORESTRY RESOURCES

Forest lands are defined under Public Resources Code (PRC) Section 12220(g) as "land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. Timberland is defined under Public Resources Code Section 4526 as "land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce timber and other forest products, including Christmas trees. Commercial species shall be determined by the board on a district basis.

The Project site is not located in forest lands or timberland.

Discussion of Impacts:

a) *No Impact*. The proposed project site possesses soils that are considered "not prime" for agricultural production according to the California Department of Conservation. The County has zoned the area as Agricultural 20 Acre min (A20) which allows agricultural production. The site is not identified on the Department of Conservation's Important Farmland Series Mapping and Monitoring Program. Based on the above, development impacts related to the conversion of prime, unique, or important farmland would not occur. There is no impact.

b) *No Impact*. The proposed project site is currently zoned for agricultural uses but not under a Williamson Act contract. Therefore, Project implementation would not result in conflicts with existing agricultural zoning. No impacts would occur.

c) *No Impact*. The Project would not involve any other changes to the environment that would conflict with zoning for timber production. The site is not zoned TPZ. The current A20 zoning at the Project site does allow for crop and tree farming as a permitted use.

d) *No Impact.* The site is not located in forest lands.

e) *No Impact.* Implementation of the proposed project would not result in a conversion of farmland to non-farmland. Therefore, no impacts would occur in this regard.

Mitigation Measures: No mitigation measures are required as there is no impact.

Findings: In the course of the above evaluations, there will be no impacts associated with *Agricultural Resources* because of the inability of a project of this scope to create such impacts or the absence of project characteristics producing effects of this type.

References:

DOC (California Department of Conservation). 2010a. Division of Land Resource Protection, Farmland Mapping and Monitoring Program. https://www.conservation.ca.gov/dlrp/fmmp/Pages/Index.aspx.

Trinity County. *General Plan Open Space and Conservation Element.*

III. Air Quality	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
When available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment for an applicable federal or state ambient air quality standard?	☐	☐	☐	☒
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☒	☐	☐

Setting:

The Project is located in Trinity County, which is a part of the North Coast Air Basin (NCAB). The NCAB extends for 250 miles from Sonoma County in the south to the Oregon border. The climate of NCAB is influenced by two major topographic units: the Klamath Mountains and the Coast Range provinces. The climate is moderate with the predominant weather factor being moist air masses from the ocean. Average annual rainfall in the area is approximately 50 to 60 inches with the majority falling between October and April. Predominate wind direction is typically from the northwest during summer months and from the southwest during winter storm events.

Project activities are subject to the authority of the North Coast Unified Air Quality Management District (NCUAQMD) and the California Air Resources Board (CARB). The NCUAQMD is listed as "attainment" or "unclassified" for all the federal and state ambient air quality in Trinity County. The only exception is for 24-hour particulate (PM10) standards in Humboldt County (which is not a part of the Project area). Due to the large size of the NCUAQMD, it is well understood that particulate matter can travel from other areas into Humboldt County (such as from Trinity County) and affect air quality. In the NCUAQMD, particulate matter has been determined to be primarily from vehicles, with the largest source of fugitive emissions from vehicular traffic on unpaved roads.

In determining whether a project has significant air quality impacts on the environment, agencies often apply their local air district's thresholds of significance to project in the review process. The District has not formally adopted specific significance thresholds, but rather utilizes the Best Available Control Technology (BACT) emissions rates for stationary sources as defined and listed in the NCUAQMD Rule and Regulations, Rule 110 – New Source Review (NSR) and Prevention of Significant Deterioration (PSD), Section 5.1 – BACT (pages 8-9) (NCUAQMD, 2018).

Sensitive receptors (e.g. children, senior citizens, and acutely or chronically ill people) are more susceptible to the effect of air pollution than the general population. Land uses that are considered sensitive receptors typically include residences, schools, parks, childcare centers, hospitals, convalescent homes, and retirement homes. The nearest sensitive receptors to the Project site are tenants of a single-family residence on an adjacent parcel (approximately 686 feet/0.13 mile northeast of the Project site).

Discussion of Impacts:

a, b) Since Trinity County is in attainment or unclassified for all federal and state air quality standards, the Project is not subject to an air quality plan. The NCUAQMD prepared a Draft Particulate Matter Attainment Plan in May 1995, which is only applicable to portions of the District which are nonattainment for PM10 (e.g., Humboldt County). There would be no impact resulting from Project activities in this regard.

Construction activities proposed by the Project may create minor amounts of dust from extending existing onsite electrical lines to the proposed shipping containers and greenhouses, installation of a new septic system for the manufacturing container, and construction the catchment pond, but these activities are considered minor activities and would not create dust emissions that would require specialized abatement practices. There would also be a short-term increase of vehicle exhaust during the delivery of the shipping containers to the Project site, and exhaust from chainsaws during the removal of the five Oregon oak trees. These sources would be the only contribution to Project-related changes to existing ambient air quality and will only onsite be for a short and temporary duration. Vehicle use during operation of the Project would be limited to light duty vehicles, and dust emissions would be minor and insignificant. Vehicle traffic associated with the Project is not expected to generate dust emissions that would cause a substantial increase in PM10 within the surrounding area, Trinity County or the NCUAQMD. As such, the Project will not violate any air quality standard, contribute substantially to an existing or projected air quality violation, or result in a cumulative increase of any criteria pollutant for which the region is in non-attainment.

The Project does not propose to use generators for power, as the site has power provided by the Trinity Public Utilities District (TPUD). Should generators be used at a future time (e.g. as a backup energy source should the TPUD service go down), those uses would be required to be in compliance with the California Air Resources Board (CARB) requirements for the Portable Equipment Registration Program (PERP), should the generators qualify for coverage by this permitting program, or as may be required by the NCUAQMD. Based on the analysis above, there were no impacts identified.

c) Due to the nature and size of the Project, construction and operational activities are not expected to generate air quality pollutants that would cause a significant impact, and the development of the Project will not expose sensitive receptors or a large number of people to substantial pollutant concentrations.

Pesticide applications are normally required to be administered a minimum of 300 feet from sensitive receptors (e.g. residences) in the case of dry pesticides and 200 feet in the case of wet pesticides. Generally, pesticide application should occur at low wind velocities (less than 10 mph). As shown on Figure 4 (Project Diagram) and based on a review of aerial photography, application of

pesticides in the greenhouses would occur approximately 686 feet from the closest sensitive receptors: a residential building to the northeast on an adjacent downhill parcel. The requirement to maintain appropriate setbacks from nearby residences and limit spraying activities at low wind velocities is a standard County development condition related to cannabis operations. Specifically, the following condition of approval will be a part of the CUP:

> *Condition of Approval.* The spray application of pesticides (e.g. neem oil, sulfur or other materials) shall occur no closer than 500 feet to an adjacent residence. Spraying shall not occur at wind speeds greater than 10 miles per hour (CCR, Title 3, Division 6, 6960(b)(3)). The operator shall measure the wind speed prior to and during spraying activities to ensure wind speeds are below 10 mph. Spraying activities shall cease if wind speeds are measured at greater than 10 mph.

Based on the analysis above and proposed operating restrictions, development and operation of the Project would have a less than significant impact.

d) The Project is surrounded by similar private properties with comparable land uses, including many already having various large industrial structures such as shops, garages and warehouses, immobilized recreational vehicles and trailers, outbuildings and scattered debris. The Project parcel itself—and notably the proposed Project area on the parcel—is situated topographically higher in altitude than all but one of the neighboring/adjacent parcels such that the Project site is not directly visible to offsite viewers. The proposed project site has the same general features as surrounding parcels, including an existing cannabis cultivation area and a variety of above and below ground utility services.

Odors that would be generated by the proposed cannabis facility would primarily occur from the cultivation activities. Odors from flowering cannabis plants can be strong within the immediate vicinity of cultivation sites. With the distance of the operation from the nearest offsite sensitive receptor, a single-family home approximately 686 feet (to the northeast), while well outside the 350-foot County Cannabis Ordinance setback requirement from a neighboring habitable dwelling, the effect of strong odors from flowering cannabis plants can be objectionable to some people, which could be considered a significant impact from Project operations.

The Applicant has prepared an Odor Control Plan, found at Attachment A to this document, and upon implementation will serve to reduce any potential impacts from proposed project operations related to objectionable odors to a less-than-significant level. Pursuant to Section 17.43G.040.E of County Ordinance No. 315-849 (Amended Cannabis Program Ordinance), an Odor Control Plan is not required for lands zoned Agricultural, which is how the Project site is currently zoned. Implementation of the Applicant's proposed Odor Control Plan is included as a mitigation strategy should a substantial number of people be adversely affected by odors generated by Project operations.

Mitigation Measure AQ-1: Implementation of the Project's Odor Control Plan, as needed, will reduce potential impacts related to objectionable odors to a less-than-significant level.

Findings: In the course of the above evaluation, it is determined that due to Project design, size, location, proposed operating restrictions, and implementation of Mitigation Measure AQ-1 as needed, the Project will have a less than significant impact to *Air Quality*.

References:

California Air Resources Board. 2013. "Ambient Air Quality Standards." http://www.arb.ca.gov/research/aaqs/aaqs2.pdf.

———. 2017. *Area Designation Maps/State and National.* https://www.arb.ca.gov/permits/permits.htm. Accessed: October 19, 2020.

———. 2020. "Top 4 Measurements and Days Above the Standard." http://www.arb.ca.gov/adam/. Accessed: November 7, 2020.

California Department of Pesticide Regulation. *California Code of Regulations, Title 3, Food and Agriculture, Division 6. Pesticides and Pest Control Operations. Chapter 4. Environmental Protection, Subchapter 5. Surface Water, Article 1, Pesticide Contamination Prevention. Section 6960.* https://www.cdpr.ca.gov/docs/legbills/calcode/040501.htm. Accessed: November 7, 2020.

North Coast Unified Air Quality Management District. 2018. http://ncuaqmd.org/index.php?page=rules.regulations. Accessed: October 19, 2020.

Trinity County. *Cannabis Ordinance No. 315-823.* Enacted October 3, 2017.

———. *Cannabis Ordinance No. 315-829.* Enacted February 6, 2018

———. *Cannabis Ordinance No. 315-830.* Enacted March 6, 2018.

———. *Cannabis Ordinance No. 315-841.* Enacted September 19, 2018.

———. *Cannabis Ordinance No. 315-843.* Enacted March 20, 2019.

IV. Biological Resources	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	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, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Setting:

The Project is situated on lands that have been previously disturbed by selective timber harvest and agricultural activities, and is currently used for a single-family residence and cannabis production, as well as appurtenant structures and related uses.

Discussion of Impacts:

a) A Biological Assessment was prepared for the Project by the applicant's consultant, Down River Consulting (see Attachment B, Biological Assessment and Addendum). The biological assessment included an evaluation of onsite wildlife habitats and the potential presence of Threatened, Endangered, or Sensitive (TES) plant and animal species as well as exotic and/or invasive species. The evaluation found that the site has been historically disturbed by past logging and agricultural

activities and existing plant communities and wildlife habitats consist primarily of native and non-native and invasive plant species.

Literature searches and data analysis of the nine-quadrangle area surrounding the Project site documented occurrences of 11 special status bird species, 8 mammal species of special concern, 3 amphibians of special concern, 4 special status fish species, two invertebrates of special concern, and three special plant species.

Of the 31 species identified, there is very low likelihood that any would be impacted by development of the Project as they are either not present on the site or the habitat areas are not considered part of the Project site (Down River Consulting, 2019). The farm manager will shield all greenhouse lights and install only downcast red LED exterior lighting to mitigate the lighting impacts per existing regulatory requirements of the Trinity County Cannabis Ordinance and CDFA regulations, which will prevent lighting spillover into any sensitive habitat areas in the vicinity of the Project area.

Fisher dens have been documented in close proximity to this project. Fishers and birds of prey could potentially hunt the abundant prey populations available on this property. Fisher mortality has been associated with anticoagulant rodenticides in the Klamath Ranges and the North Coast of California. Any impact that would result in a loss of viability of the previously mentioned predator populations would be considered significant; therefore, Mitigation Measure Bio-5, outlined below, has been developed and will be implemented as part of Project operations that will reduce this potential impact to a less-than-significant level.

There is the aggressively invasive exotic yellow starthistle (*Centaurea solstitialis*) present in the open areas adjacent to the ponds. Many other noxious weed species are present in the cultivation area (see Attachment B, Biological Assessment for a complete list of plants found in the project areas). Proliferation of untreated noxious weeds causes wildlife habitat degradation and has been found to result in enormous agricultural losses. These impacts are considered significant, and Mitigation Measures Bio-1 and Bio-2, outlined below, have been developed and will be implemented as part of Project construction and ongoing operations that will reduce these potential impacts to a less-than-significant level.

b) The Project does not propose any development or impacts to onsite riparian habitat or any sensitive natural community. Riparian habitat occurs in association with the two onsite ponds. No impacts will occur in this regard.

c) The two onsite ponds are artificially formed jurisdictional wetlands and would not be affected by Project construction and buildout; the ponds are permitted structures and registered diversions allowing for irrigation purposes. Since these features will be disturbed by the proposed project, no impacts to federally protected wetlands would occur.

d) Due to the relatively small scale of the proposed project, the movement of any native resident or migratory wildlife species or established native resident or migratory wildlife corridors is not anticipated to be significant. The Project does not propose to alter any streams or rivers or otherwise impact fish movements. Also, the Project site has been previously developed, farmed and otherwise developed with historical activities prior to the Project proposal. These historic activities may have previously altered deer migration or local travel patterns, but this impact is considered the baseline

condition and is not considered an impact for this Project. Fencing that may be required around the cannabis operations represents a small portion of the overall historically impacted area and is not seen as a significant impediment to deer migration or the migration of other mammals.

Conversion and construction activities may cause destruction of nests or abandonment of young. Harm to bird nests or eggs would be considered a significant impact; therefore, Mitigation Measure Bio-4, outlined below, has been developed and will be implemented as part of Project construction and ongoing operations that will reduce these potential impacts to a less-than-significant level.

e) The County General Plan, Conservation Element, discusses the need for the protection and conservation of natural resources including biological resources within the county. While the plan outlines various goals and objectives, there has been no policy developed related to specific biological resources or tree preservation or management that would specifically apply to the Project and the lands where the Project is located. Site development may result in a net loss of 40,000 ft^2 of moderately degraded oak woodland habitat: the Project proposes to remove five Oregon oak (*Quercus garryana*) individuals less than 16" DBH in order to install some of the proposed shipping containers onsite. Though the Project has been designed to avoid impacts to not only the greatest number of existing trees but also the largest and most significant in terms of size and potential wildlife habitat value, loss of Oregon oak woodland would be considered significant. As a result, Mitigation Measure Bio-3, outlined below, has been developed and will be implemented as part of Project construction and ongoing operations that will reduce these potential impacts to a less-than-significant level.

f) No habitat conservation plans, or other similar plans have been adopted for the Project site or Project area. No impact would occur in this regard.

Mitigation Measures: The following mitigation measures have been developed to reduce potential impacts related onsite biological resources to less than significant levels:

Mitigation Measure Bio-1. Any heavy equipment used to develop the property should be thoroughly washed and inspected for weeds before arrival in order to prevent the introduction of new weed species.

Mitigation Measures Bio-2. Monthly monitoring and treatment of yellow starthistle in the Project development area should be conducted throughout the growing season, together with rapid (treatment) response for new weed populations and modification of an integrated pest management plan, which addresses the biological considerations of the target species.

Mitigation Measure Bio-3. Two Oregon oak seedlings shall be planted within the riparian setback around the ponds for every oak tree that is cut during Project development. Seedlings shall be watered once monthly from May through October, for the first three years after planting. Vitality of said plantings shall be monitored once annually. Replanting will occur if the viable population of seedlings drops below 85%. Additionally, vigor monitoring of the planted oaks shall occur once annually, for a period of five years. Data collected for each plant will include date, height, and vigor (good, moderate, poor, or dead). Replacement plantings will occur annually if the planting survival rate falls below 85% of the total original planting numbers.

Mitigation Measures Bio-4. Nest and den surveys shall be completed within seven (7) days prior to construction or disturbance by a qualified biologist, as defined in §722.3.A of the California Code of Regulations, if the activities occur between February 1st and August 31st. In the event that a nest or den is

detected, a protective buffer shall be established by the biologist to avoid deleterious impacts to the animal or offspring, such as nest abandonment.

Mitigation Measures Bio-5. To mitigate for unintended harm to fishers, the farm shall use preventative and non-chemical strategies to control rodents. The rodent prevention strategy will focus on reducing the rodent carrying capacity of the site by removing food access and items/features that could provide habitat to rodents. The farm manager will erect owl boxes if needed. In the event that an infestation is detected, traps and EradiBait, a non-anti-coagulant powder corn cob, will be used to extirpate the pests.

Findings: With the implementation of the mitigation measures identified the Project will have a less than significant impact to *Biological Resources*.

References:

Down River Consulting. Biological Assessment, Green Beach Ventures LLC/Frog Pond Legacy, LLC, 324 Frog Pond Lane, Hayfork, CA 96041. May 2019. Addendum: November 25, 2020.

California Department of Pesticide Regulation. *Legal Pest Management Practices for Cannabis Growers in California.* December 2017. https://www.cdpr.ca.gov/docs/county/cacltrs/penfltrs/penf2015/2015atch/attach1502.pdf. Accessed: November 11, 2020.

———. *Cannabis Pesticides that Cannot be Used.* September 2018. https://www.cdpr.ca.gov/docs/cannabis/cannot_use_pesticide.pdf. Accessed: November 11, 2020.

Trinity County. *General Plan Open Space and Conservation Element.*

USFWS. 2019. National Wetland Inventory. https://www.fws.gov/wetlands/data/Mapper.html. Accessed: November 12, 2020.

V. Cultural Resources	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant § 15064.5?	☐	☒	☐	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☒	☐	☐
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

Setting:

The Project site has a documented history of being developed for resource extraction (minor logging) and has had minor cannabis cultivation. Other non-historical cultural uses may have occurred at the Project site and in the surrounding vicinity. The Applicant provided a cultural resource study conducted by Nick Angeloff for Archaeological Research and Supply Company that evaluated the proposed project site.

Discussion of Impacts:

a) An onsite cultural resources survey was conducted by Nick Angeloff for Archaeological Research and Supply Company (provided at Attachment C). The survey did not identify any prehistoric or historic archaeological sites during the reconnaissance survey. There are no National Register of Historic Places (NRHP) or California Register of Historic Resources (CRHR) sites located at the Project, or within close proximity of the site, that would call for the retention of the historical structure or listing. Therefore, no impacts to historical resources would occur with implementation of the proposed project.

b) A cultural resources review completed for the Project did not find any archaeological site that could be impacted by the proposed project; however, there is a possibility that cultural resources, including buried archaeological materials, could exist in the area and may be uncovered during Project development. Therefore, if any resources are found during the construction of the proposed project, they will be mitigated through implementation of Mitigation Measure CR-1. Adherence to protocols established by Mitigation Measure CR-1 would serve to avoid impacts that would result in a substantial adverse change in the significance of an archaeological resource as defined in CEQA §15064.5. Impacts would be less than significant with mitigation incorporated.

c) There are no known burial sites on or immediately adjacent to the proposed project site. If human remains are unearthed during future development of the site, the provisions of California Health and Safety Code Section 7050.5 shall apply. Under this Section, no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition, pursuant to California Public Resources Code Section 5097.98 and Mitigation Measure CR-2. Impacts are considered less than significant with mitigation incorporated.

Mitigation Measures: The following mitigation measures have been developed to reduce potential impacts related to undocumented cultural resources and unknown human burials to less than significant levels:

Mitigation Measure CR-1. If cultural resources, such as chipped or ground stone, or bone are discovered during ground-disturbance activities, work shall be stopped within 50 feet of the discovery, as required by the California Environmental Quality Act (CEQA; January 1999 Revised Guidelines, Title 14 California Code of Regulations [CCR] 15064.5 (f)). Work near the archaeological finds shall not resume until a professional archaeologist, who meets the Secretary of the Interior's Standards and Guidelines, has evaluated the material and offered recommendations for further action.

Mitigation Measures CR-2. If In the event that previously unidentified evidence of human burial or human remains are discovered during Project construction, work will stop at the discovery location, within 20 meters (66 feet), and any nearby area reasonably suspected to overlie human remains (Public Resources Code, Section 7050.5)., The Trinity County Coroner must be informed and consulted, per State law. If the coroner determines the remains to be Native American, he or she shall contact the Native American Heritage Commission within 24 hours. The Native American Heritage Commission shall identify the person or persons it believes to be the most likely descendent. The most likely descendent will be given an opportunity to make recommendations for means of treatment of the human remains and any associated grave goods. when the commission is unable to identify a descendant or the descendants identified fail to make a recommendation, or the landowner or his or her authorized representative rejects the recommendation of the descendants and the mediation provided for in subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall reinter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance. Work in the area shall not continue until the human remains are dealt with according to the recommendations of the County Coroner, Native American Heritage Commission and/or the most likely descendent have been implemented.

Findings: With the implementation of the mitigation measures identified the Project will have a less than significant impact to *Cultural Resources*.

References:

Archaeological Research and Supply Company. *A Cultural Resources Investigation of the Herron Property, Hayfork, Trinity County, CA.* May 2019.

VI. Energy	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Setting:

Construction related energy consumption is considered finite, or short-term, and is considered consistent with construction activities of similar land uses. All construction activities would either rely on the consumption of oil in the form of gasoline and diesel fuel or utilize the three-phase electrical service from Trinity Public utility District (TPUD) that is to be brought the subject property. The construction activities temporarily increase in energy use would not result in a significant increase in peak or base demands or require additional capacity from the local energy supplier.

There are no local plans for renewable energy or energy efficiency. California passed AB 32 which requires local governments to take an active role in addressing climate change and reducing greenhouse gas (GHG) emissions using methods such as energy efficiency in new development. The Project would be required to comply with the building energy efficiency standards of California Code of Regulations Title 24, Part 6, also known as the California Energy Code. California's Title 24 is the adopted Energy code for Trinity County, as well as the rest of the State of California. The proposed project will comply with these regulations and would inherently reduce energy consumption.

Nine (9) of the shipping containers will utilize standard market-available energy efficient (e.g., compact fluorescent or halogen) light bulbs (total of 25 distributed throughout) and none are to be used for the cultivation operation. One (1) of the shipping containers will employ eight (8) LED Grow Lights (600 watts each) for the R&D area.

Upon Project completion, renewable energy from TPUD is available and planned to be utilized as the primary source of energy, which aligns with state plans for energy from renewable sources.

Discussion of Impacts:

a) Upon completion of Project construction, all Project operations will utilize the energy provided by TPUD. There are no generators or other large machinery proposed for use either during construction or during operation. Additionally, the applicant intends to install solar panels on the roofs of the barn and home, which will reduce consumption of energy from the grid and reliance upon consumption of offsite sources in of energy in general. Due to the nature of Project impacts are considered less than significant.

b) There are no local plans for renewable energy or energy efficiency. California passed AB 32 which requires local governments to take an active role in addressing climate change and reducing greenhouse gas (GHG) emissions using methods such as energy efficiency in new development. As noted above, the proposed project would not result in a substantial increase in energy consumption beyond existing conditions. The applicant also plans to incorporate solar panels on the roofs of the barn and home, which will be a direct application of renewable energy onsite. Therefore, the proposed project would not conflict or obstruct plans related to renewable energy or energy efficiency, and impacts are less than significant.

Mitigation Measures: No mitigation measures are required. Impacts would be less than significant.

Findings: Based upon the review of the information above the implementation of the Project will have a less than significant impact with respect to *Energy*.

References:

Trinity County. *Trinity County General Plan.*

VII. Geology and Soils	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1. 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.	☐	☐	☐	☒
2. Strong seismic ground shaking?	☐	☐	☒	☐
3. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
4. Landslides?	☐	☐	☒	☐
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
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 an on- or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems in areas where sewers are not available for the disposal of wastewater?	☐	☐	☒	☐
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

Setting:

The Project is situated in the Western Paleozoic and Triassic Belt of the Klamath Mountains province, on the Weaverville Formation, and is composed of sandstone and conglomerate from the Oligocene to Miocene epochs. Upland, to the south of the property, accreted formations from the Eastern Hayfork terrane, composed of argillite and chert from the Devonian to Jurassic periods, dominate. The property is bounded by two faults, one is located approximately less than 3,000 feet to the south, and another major thrust fault is

located less than a mile away to the southwest. The thrust fault separates the Western Hayfork terrane from the Eastern Hayfork terrane, near Hayfork Creek. These faults are not active.

Soils at this site are well-drained and consist of interbedded lenses of loam, gravelly clay loam, gravelly sandy clay loam, and clay loam. These soils are classified as moderately erosive with a K-value of 0.37 and have a hydrological class rating of C. Soils here are the resultant alluvium derived from igneous, metamorphic, and sedimentary rocks.

Discussion of Impacts:

a) The Project may expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault:

There are no active faults mapped in the Project vicinity. The California Geological Survey (CGS, 2018) has the responsibility for mapping active earthquake faults in California, through legislation referred to as the Alquist-Priolo Earthquake Fault Zoning Act. There are no Alquist-Priolo earthquake fault zones identified in close proximity to the Project site. There is no supplemental geologic data to suggest unmapped active faults in the region. Based on this existing information, there will be no impact to the Project components from impacts related to surface fault rupture.

ii) Strong seismic ground shaking:

Although there are known earthquake faults in the Project vicinity these are not considered active. The entire northern California region is subject to the potential for moderate to strong seismic shaking due to distant seismic sources. Seismic shaking can be generated on faults many miles from the Project vicinity. Seismic shaking potential is considered minimal and the hazard is not higher or lower at the Project site than throughout the region. Standard design and construction practices meeting current California Building Code (where applicable) will provide adequate protection for buildings, pipelines and other facilities anticipated for the Project. The implementation of these standard building practices will allow the Project to have less than significant impacts.

iii) Seismic-related ground failure, including liquefaction:

Although located in a seismically active region (northern California), the Project site is not likely to be subject to seismic shaking of adequate strength or duration to generate secondary seismic effects. Likely seismic sources are too far from the Project site to generate sufficient long-duration strong shaking. Construction standards that meet the current California Building Codes (as applicable) will provide adequate protections and ensure less than significant impacts.

iv) Landslides:

The subject parcel is located on low, moderately-hilly terrain, surrounded by gradually steeper slopes and mountainous terrain; the proposed project site itself is of a very gentle grade. There

are no documented landslide hazard areas identified within the immediate vicinity of the site that would have an impact on the proposed project. Impacts would be less than significant.

b) The Project soil classifications consist mainly of well-drained and consist of interbedded lenses of loam, gravelly clay loam, gravelly sandy clay loam, and clay loam. These soils are classified as moderately erosive with a K-value of 0.37 and have a hydrological class rating of C. The site's gentle topography (1%-2% slope maximum for most of the parcel, and the entirety of the Project area) necessitates very little grading to develop the Project, and therefore substantial erosion and sediment transport offsite would not pose a significant impact. Impacts would be less than significant.

c) See discussion VII.a, above.

d) There are no documented expansive soils located at the Project site. No impacts would occur in this regard.

e) An existing permitted septic system is installed on the Project site which meets the requirements of Trinity County Environmental Health Department. Impacts are less than significant.

f) No paleontological resources or unique geologic features have been identified on the proposed Project site, and the potential for their occurrence is considered minimal; there will be no impact.

Mitigation Measures: No mitigation measures are required. Impacts would be less than significant.

Findings: Based upon the review of the information above, the implementation of the Project will have a less than significant impact with respect to *Geology and Soils.*

References:

California Geological Survey. 2018. *Fault-Rupture Hazard Zones in California, Special Publication 42, Interim Revision 2018*. Sacramento, California.

Johnson, T.D., and Belitz, Kenneth. 2014. *California Groundwater Units: U.S. Geological Survey Data Series 796, 34 p.* https://dx.doi.org/10.3133/ds796. ISSN 2327–638X.

National Resource Conservation Service. *WebSoil Survey.* https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx. Accessed: October 30, 2020.

USGS. U.S. *Quaternary Faults.* *https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=5a6038b3a1684561a9b0aadf88412fcf*. Accessed: October 30, 2020.

VIII. Greenhouse Gas Emissions	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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?	☐	☐	☒	☐

Setting:

Greenhouse gases (GHGs) are gases in the atmosphere that absorb and emit radiation. The greenhouse effect traps heat in the troposphere through a three-fold process, summarized as follows: short wave radiation emitted by the sun is absorbed by the Earth; the Earth emits a portion of this energy in the form of long wave radiation; and GHGs in the upper atmosphere absorb this long wave radiation and emit this long wave radiation into space and toward the Earth. This "trapping" of the long wave (thermal) radiation emitted back toward the Earth is the underlying process of the greenhouse effect. The main GHGs in the Earth's atmosphere are water vapor, carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), ozone (O3), hydrofluorocarbons (HCFs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF6).

California has passed Assembly Bill 32, mandating a reduction in greenhouse gas (GHG) emissions and Senate Bill 97, evaluating and addressing GHG under CEQA. On April 13, 2009, Governor's Office of Planning and Research (OPR) submitted to the Secretary for Natural Resources its proposed amendments to the state CEQA Guidelines for GHG emission, as required by Senate Bill 97 {Chapter 185, 2007} and they became effective March 18, 2010. As a result of these revisions to the CEQA Guidelines, lead agencies are obligated to determine whether a project's GHG emissions significantly affect the environment and to impose feasible mitigation to eliminate or substantially lessen any such significant effects. At this time, neither the NCUAQMD nor Trinity County has established thresholds of significance for evaluating a project's GHG emissions. In addition, neither a Climate Action Plan nor GHG Reduction Plan has been developed for Trinity County.

Discussion of Impacts:

a) There are several unique challenges to analyzing greenhouse gas emissions and climate change largely because of the global nature of climate change. Most environmental analyses examine the "project-specific" impacts that a particular project is likely to generate. With regard to global warming, however, it is generally accepted that while the magnitude of global warming effects is substantial, the contribution of an individual project is so small that direct project-specific impacts are highly unlikely. In any regard, the applicant is planning to install solar panels on the roofs of the barn and home, which will serve as a means to offset the Project's minor contribution to greenhouse gases and further ensure that the Project's impacts upon greenhouse gas emissions will be less than significant.

The proposed project involves the construction and operation of several cannabis-related businesses. The proposed project could generate both direct and indirect GHG emissions. Direct GHG emissions include emissions from construction activities, area sources, and mobile (vehicle) sources. Typically, mobile sources make up the majority of direct emissions. Indirect GHG emissions are generated by incremental electricity consumption and waste generation. Electricity consumption is responsible for the majority of indirect emissions.

As noted above, neither the NCUAQMD nor Trinity County has established thresholds of significance for evaluating a project's GHG emissions. Since there are no applicable thresholds for projects in the Air District or Trinity County, the NCUAQMD recommends the use of thresholds and guidance provided by other air districts in the State such as the Bay Area Air Quality Management District (BAAQMD). The BAAQMD has developed project screening criteria to provide lead agencies and project applicants with a conservative indication of whether a project could result in potentially significant impacts related to greenhouse gas emissions. Projects below the applicable screening criteria would not exceed the 1,100 metric tons (MT) of CO2e/yr GHG threshold established by the BAAQMD for land use projects, which include commercial and industrial facilities. The operational size of the Project as proposed comprises a combined area of 19,400 square feet, and therefore well below the 121,000-square-foot screening threshold size for operational GHG emission levels from a General Light Industrial project.

The proposed project itself, in terms of operations, would not by its nature and design generate a significant amount of GHG emissions. Project operations will be powered by electricity provided through TPUD; the use of a generator or generators would only be for emergency backup power should there be an interruption of TPUD service. During construction, heavy equipment will be used to dig foundations for prefabricated buildings and, to a lesser degree, erect and install those structures; this phase of the Project and the use of such equipment will be finite, intermittent, and short-term. Based on the analysis above, implementation of the Project would have a less than significant impact.

b) The proposed project involves the construction and operation of several cannabis-related businesses. As a result, the proposed project could generate both direct and indirect GHG emissions. As noted above, there are no local plans that have been adopted for the purpose of reducing the emissions of greenhouse gases.

In 2006, the California Global Warming Solutions Act (Assembly Bill 32) definitively established the state's climate change policy and set GHG reduction targets (Health & Safety Code §38500 et sec.), including setting a target of reducing GHG emissions to 1990 levels by 2020. AB 32 requires local governments to take an active role in addressing climate change and reducing greenhouse gas (GHG) emissions. Recommendations to reduce residential GHG emissions include promoting energy efficiency in new development and improved coordination of land use and transportation planning on the city, county and subregional level, and other measures to reduce automobile use.

It is noted that the California Air Resources Board (CARB) announced in July 2018, that the State has already met the AB 32 goal of reducing emissions to 1990 levels by 2020 approximately four years early. As stated in the Executive Summary of the 2018 Edition of the California Greenhouse Gas Emissions Inventory: 2000-2016:

> *"The inventory for 2016 shows that California's GHG emissions continue to decrease, a trend observed since 2007. In 2016, emissions from routine GHG emitting activities statewide were 429 million metric tons of CO2 equivalent (MMTCO2e), 12 MMTCO2e lower than 2015 levels. This puts total emissions just below the 2020 target of 431 million metric tons. Emissions vary from year-to-year depending on the weather and other factors, but California will continue to implement its greenhouse gas reductions program to ensure the state remains on track to meet its climate targets in 2020 and beyond."*

The Project is subject to a myriad of state regulations applicable to project design, construction, and operation that would reduce GHG emissions, increase energy efficiency, and provide compliance with the California Air Resources Board (CARB) Climate Change Scoping Plan (CARB, 2017). The State of California has the most comprehensive GHG regulatory requirements in the United States, with laws and regulations requiring reductions that affect project emissions. Legal mandates to reduce GHG emissions from vehicles, for example, reduce project-related vehicular emissions. Legal mandates to reduce GHG emissions from the energy production sector that will serve the proposed project would also reduce project-related GHG emissions from electricity consumption. Legal mandates to reduce per capita water consumption and impose waste management standards to reduce methane and other GHGs from solid wastes are all examples of mandates that reduce GHGs.

The Project has been designed such that all proposed operations facilities other than the Nursery and cultivation site would be enclosed within self-contained shipping containers that are required to maintain positive control of the internal environment, and air exhaust from all buildings, including greenhouses used for the Nursery and cultivation area, will be vented through carbon filters to reduce the possibility of any and all incidental emissions that could result from operational activities. Based on the analysis above, development of the Project would have a less than significant impact.

Mitigation Measures: No mitigation measures are required. Impacts would be less than significant.

Findings: In the course of the above evaluation, impacts associated with *Greenhouse Gas Emissions* were found to be less than significant because of the limited size, nature, and location of the Project.

References:

Bay Area Air Quality Management District. *California Environmental Quality Act Air Quality Guidelines.* 2017.

California Air Resources Board. *2017 Climate Change Scoping Plan: The Strategy for achieving California's 2030 greenhouse gas reduction target.* January 20, 2017.

——— *8th Edition, California Greenhouse Gas Emissions Inventory: 2000-2016. California Greenhouse Gas Emissions for 2000 to 2016, Trends of Emissions and Other Indicators.* 2018.

Trinity County. *Cannabis Ordinance No. 315-823.* Enacted October 3, 2017.

———. *Cannabis Ordinance No. 315-829.* Enacted February 6, 2018.

———. *Cannabis Ordinance No. 315-830.* Enacted March 6, 2018.

———. *Cannabis Ordinance No. 315-841.* Enacted September 19, 2018.

———. *Cannabis Ordinance No. 315-843.* Enacted March 20, 2019.

———. *District History.* https://www.trinitypud.com/about/history.aspx. Accessed: October 30, 2020.

———. *Regional Transportation Plan.* October 2017.

IX. Hazards and Hazardous Materials	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	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 reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c. Emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d. Be located on a site that 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. Be located within an airport land use plan area or, where such a plan has not been adopted, be within two miles of a public airport or public use airport, and result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f. Be located within the vicinity of a private airstrip and result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
h. Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☒	☐

Setting:

Hazards are those physical safety factors that can cause injury or death, and while by themselves in isolation may not pose a significant safety hazard to the public, when combined with development of projects can exacerbate hazardous conditions. Hazardous materials are typically chemicals or processes that are used or generated by a project that could pose harm to people, working at the site or on adjacent areas. Many of these chemicals can cause hazardous conditions to occur should they be improperly disposed of or

accidentally spilled as part of Project development or operations. Hazardous materials are also those listed as hazardous pursuant to Government Code Section 65962.5.

Lists of hazardous materials are maintained by federal and state agencies and are available for public review. The US Environmental Protection Agency (USEPA) maintains a database of hazardous materials as well as radiological materials as part of its RCRAInfo database (USEPA, 2019). The State of California Department of Toxic Substances Control (DTSC) maintains a list of hazardous substances and contaminated sites as part of its Envirostor database (DTSC, 2019), as well as other hazardous and waste sites being overseen by the various State Water Resources Control Board which are inventoried in their Geotracker database (SWRCB, 2019). These databases are available to the public for review. No hazardous facilities or sites have been documented to be present at the Project site or in the adjacent area.

The CALFIRE Fire and Resource Assessment Program (FRAP), delineates the Project area as a part of a designated "Very High Fire Hazard Severity Zone" (VHFHSZ). The FRAP designates lands in three general classifications, "Moderate", "High" and "Very High" Fire Hazard Severity Zones. Fire suppression for the area is provided by a combination of first responders such as CALFIRE (designated as a State Responsibility Area), with additional firefighting support from nearby the US Forest Service (USFS) stations, and local volunteer fire companies.

Additionally, the Trinity County General Plan-Safety Element discusses wildland fires and outlines Wildland Urban Interface Zones Fuels Treatment Goals (Safety Plan, 2002) that describe fuel treatment activities around residential and other structures.

Discussion of Impacts:

a) Small quantities of potentially hazardous substances (e.g., petroleum, chemicals used to operate and maintain vehicles and equipment) would be used at the Project site, but none of these materials will be stored at the Project facilities in quantities to be considered a significant hazard. Fertilizers and soil amendments are used during cultivation operations and are purchased and transported to the site as needed, these will be stored within a shed adjacent to the residence. The nutrients used during the 2017-2018 growing season are listed in the Applicant's Site Management Plan SMP). Pest management consists of applications of commercially available Granja (neem oil) cake. The product is listed by the California Department of Pesticide Regulation (DPR) as "Legal to Use on Cannabis." The applicant states that these are routinely purchased and utilized onsite but are not stored in large quantity (see Section 2.0, Project Description). Application of fertilizers and pesticides are used on cultivation areas only. Applicant has stated that used fertilizer and chemical containers are disposed of according to manufacturer's requirements and taken to the Hayfork Transfer Station solid waste facility. Compliance with standard transport and handling procedures of the chemical manufacturers and standard conditions of approval through the various County cannabis ordinances and DPR requirements would ensure that impacts would be less than significant.

b) The proposed project could expose workers, the public, or the environment to hazardous materials through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Small quantities of potentially hazardous substances (e.g., petroleum and other chemicals used to operate and maintain equipment, fertilizers and pesticides) would be used at the proposed project site. Accidental releases of these substances could potentially contaminate soils and degrade the quality of surface water and groundwater, resulting in a public safety hazard. Compliance with standard safety procedures, hazardous materials handling

regulations, and pesticide application requirements would ensure that impacts would be less than significant.

c) The proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school (the nearest one is Hayfork High School, five miles away). No impacts would occur in this regard.

d) The proposed project is not located on a site which is included on a list of hazardous materials sites and would not create a significant hazard to the public or the environment. No impacts would occur in this regard.

e) The proposed project is not located within two miles of a public or private airport (Hayfork Airport is 5.5 miles away). No impacts would occur in this regard.

f) The proposed project is not located in the vicinity of a private airstrip. No impacts would occur in this regard.

g) There are no indications at this time that the proposed project would impair implementation of, or physically interfere, with an adopted emergency response plan or emergency evacuation plan. There would be no impact from this Project and there would be no impact to users of the Project site.

h) The vast majority of the site has been previously disturbed by onsite agricultural activities. Development of the Project will comply with State Fire Safe Standards for protection of life and property from wildfires through maintaining appropriate vegetation management around proposed cultivation structures, the availability and accessibility of onsite water storage (i.e., water storage tanks storing a total of 13,100 gallons), and other actions required for fire protection/suppression actions as may be determined by the County or CALFIRE. Through implementation of fire safe standards, the Project will not be at significant risk of damage from wildfire and the Project would not cause significant wildfire risk to the area from Project-related activities and be in compliance with the County General Plan Safety Element. Based on this evaluation the Project would contribute to a less than significant impact related to increased wildfire risk in the area.

Mitigation Measures: No mitigation measures are required. Impacts would be less than significant.

Findings: In the course of the above evaluation impacts associated with *Hazards and Hazardous Materials* were found to be less than significant because of the Project size, location and limited scope of potential impact.

References:

California Department of Toxics Substances Control (DTSC). 2020. *Envirostor Database.* https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=311+Industrial+Parkway%2C+Weaverville+CA. Accessed: October 30, 2020.

California Department of Pesticide Regulation. *Legal Pest Management Practices for Marijuana Growers in California.* 2015.

State of California Fire and Resource Assessment Program. *State Responsibility Areas.* 2012.

———. Fire Hazard Severity Zones. 2007.

State Water Resources Control Board. *Geotracker Database.* 2019.

Trinity County. General Plan Safety Element. Revised March 2002.

———. *General Plan Circulation Element.* Revised 2002.

———. *Cannabis Ordinance No. 315-823.* Enacted October 3, 2017.

———. *Cannabis Ordinance No. 315-829.* Enacted February 6, 2018

———. *Cannabis Ordinance No. 315-830.* Enacted March 6, 2018.

———. *Cannabis Ordinance No. 315-841.* Enacted September 19, 2018.

———. *Cannabis Ordinance No. 315-843.* Enacted March 20, 2019.

USEPA. 2020.. *RCRA Database.* https://rcrapublic.epa.gov/rcraonline/index.xhtml. Accessed: October 30, 2020.

X. Hydrology and Water Quality	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater 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 through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐
i. result in substantial erosion or siltation on- or offsite;	☐	☐	☒	☐
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
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 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?	☐	☐	☐	☒

Setting:

The Project is on private lands surrounded by similar development. The water source for the Project is a surface diversion from an unnamed stream that fills two (2) permitted ponds. The ponds hold an estimated 370,000 gallons, cumulatively. There is a Small Irrigation Use Registration (SIUR) which allows them to store water for cannabis use; the SIUR Registration Number is H100243. Approximately 150,000 gallons are used annually for cannabis cultivation. Water Diversion Statements have been filed for this property since 2015. The Statement Numbers are S024799 and S024800. The total estimated water use for both domestic and cultivation purposes is 250,000 gallons, annually.

Impacts to water quality associated with cannabis cultivation activities proposed by the Project were initially regulated by the North Coast Regional Water Quality Control Board (RWQCB) under Order No. 2015-0023

and were required to transition to regulations of the State Water Resources Control Board (SWRCB) Order No. WQ 2019-0001-DWQ (previously WQ 2017-0023-DWQ) by July, 2019 as applicable to cannabis production. The applicant transitioned to the SWRCB Cannabis Cultivation Policy in 2019 as required. Additionally, the Cannabis Ordinances developed by the County identify specific requirements for water use and quality, including compliance with Senate Bill 94 (SB 94) and any applicable NCRWQCB or SWRCB regulations in effect. The Project applicant has also completed a Site Management Plan (SMP) for the operations at the Project site, in compliance with the conditions outlined in Order 2015-0023 as required by the Cannabis Policy. The SMP includes activities mostly consisting of roadway maintenance and erosion prevention and sediment capture treatments.

Discussion of Impacts:

a) The proposed project is served by an existing onsite permitted septic system for the treatment of domestic wastewater. Additionally, the applicant has had an SMP completed for the site and the current operations. The plan documents that the applicant has been working on improvements outlined in the plan and there is a Streambed Alteration Agreement in place between the applicant and CDFW. As stated by the Regional Water Quality Control Board the applicant is required to comply with the requirements of the Regional Order No. R1-2015-0023 which requires dischargers to implement Appendix B, Best Management Practices for Discharges of Waste Resulting from Cannabis Cultivation and Associated Activities or Operations with Similar Environmental Effects. Based on the above, the Project will have a less than significant impact.

b) Water for the proposed Project is derived from a surface diversion from an unnamed stream that fills two (2) permitted ponds. The ponds hold an estimated 370,000 gallons, cumulatively. There is a Small Irrigation Use Registration (SIUR, Registration Number H100243) which allows them to store water for cannabis use. Approximately 150,000 gallons are used annually for cannabis cultivation. Engineered plans are being developed for a rainwater catchment pond in the northwest portion of the property. Pond depth would not exceed ten (10) feet. The overflow will have a rock armored spillway, to control overtopping and subsequent discharges into waters of the state. An impervious liner such as clay will be installed on the pond bottom. A grading permit will be required prior to digging the new off-stream pond. While there is no groundwater well on the property or used for the operations, the existing two on-stream ponds and the proposed off-stream catchment basin do represent the potential for reducing a degree of groundwater recharge from the site during the growing season. The overall effect upon the groundwater basin is and will remain less than significant, even in a cumulative sense, as the parcel is perched upon a promontory and most rainwater still runs off the site, downhill towards the Duncan Creek – Carr Creek drainages, and therefore the impact from the Project is less than significant.

c) While initial excavation of the proposed catchment basin could have potential to cause erosion or siltation on- or offsite, the excavation work will be completed during the region's clear dry season (May 15 through October 15), the bottom of the basin is to be lined with an impervious material rather than left with an earthen bottom, and the overflow spillway is to be rock-armored to prevent any downcutting or erosion/soil transport; therefore, in this regard the Project poses a less than significant impact resulting from:

    i. erosion or siltation on- or offsite;

ii. increase in the rate or amount of surface runoff in a manner, resulting in flooding on- or offsite;

iii. runoff water exceeding the capacity of existing or planned stormwater drainage systems or providing substantial additional sources of polluted runoff; or

iv. impeding or redirecting flood flows.

d) Flood zones are geographic areas that FEMA has defined according to varying levels of flood risk. These zones are depicted on a community's Flood Insurance Rate Map (FIRM). Each zone reflects the anticipated type of flooding in the area. As depicted on the FEMA Flood Zones maps for the area, the Project site is not in a floodway, 100-year flood zone, or the 500-year flood zone. Based upon this information and that the location of the Project site is outside of any flood zone, there is no risk of release of pollutants due to Project inundation. The threat of a tsunami wave is not applicable to inland areas; there is no potential for the generation of a seiche. There is no risk of inundation of the site, and as such no impact would occur. No impact would occur.

e) There is no water quality control plan or sustainable groundwater management plan in place for either the community of Hayfork or the area of the County in which the proposed project is situated. There will be no impact.

Mitigation Measures: No mitigation measures are required. Impacts would be less than significant.

Findings: In the course of the above evaluation impacts associated *Hydrology and Water Quality* were found to be less than significant.

References:

Federal Emergency Management Agency. 2010. *Flood Insurance Rate Map (FIRM), Map Number 06105C1041F, Revised July 20, 2016*.

State of California. *Regional Water Quality Control Board Order No. 2015-0023.*

———. *State Water Resources Control Board Order No. WQ 2017-0023-DWQ.* https://www.waterboards.ca.gov/water_issues/programs/cannabis/docs/finaladoptedcango101717.pdf

Trinity County. *Cannabis Ordinance No. 315-823.* Enacted October 3, 2017.

———. *Cannabis Ordinance No. 315-829*. Enacted February 6, 2018.

———. *Cannabis Ordinance No. 315-830.* Enacted March 6, 2018.

———. *Cannabis Ordinance No. 315-841.* Enacted September 19, 2018.

———. *Cannabis Ordinance No. 315-843.* Enacted March 20, 2019.

XI. Land Use and Planning	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	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?	☐	☐	☐	☒

Setting:

The Project site is located northeast of central Hayfork, up on a promontory above where Duncan Creek enters Carr Creek valley. The Project site is surrounded by County General Plan designated Agricultural (A) lands and Agricultural 20 Acre minimum (A20) lands with varying levels development. There are minimal commercial and public service developments in the community of Hayfork.

The Project site parcel has the same General Plan designation and zoning as the surrounding parcels – Agricultural (A) for Agricultural 20 Acre minimum (A20). Both the County General Plan and Zoning Districts did not specifically anticipate development of commercial cannabis when these land use plans and zoning districts were developed. In response to California State Law that allows commercial cannabis activities under permitted and controlled conditions, Trinity County developed County-specific ordinances to regulate commercial cannabis cultivation, testing, nurseries, manufacturing, distribution, microbusiness, events and sales within the County. Ordinances 315-823, 315-829, 315-830 and 315-841 regulate cultivation and are all specifically titled "An Ordinance of the Board of Supervisors of the County of Trinity Amending Zoning Ordinance No. 315 Creating Section 28: Commercial Cannabis Cultivation Regulations". All of these ordinances are referred to, collectively, in this section as the "Cannabis Ordinance." Ordinances 315-828 and 315-834 regulate distribution facilities, Ordinances 315-826 and 315-827 regulate nursery operations, and Ordinances 315-838 and 315-842 regulate Manufacturing activities. All of these stipulate that the respective operations and facilities "shall not be located within one thousand (1,000) feet of a youth-oriented facility, school, church, or residential treatment facility ... or within five hundred (500) feet of an authorized school bust stop. Variances are allowed upon review of the Planning Commission." As the subject parcel is not in proximity of any of these features/facilities, the Project as proposed is in compliance with those particular provisions of the Ordinances.

The Cannabis Ordinance, in combination with the provisions of the General Plan and requirements of the Zoning Districts are used to determine appropriate land uses of cannabis operations in Trinity County. An applicant can apply for a Use Permit for cannabis cultivation operations under the Cannabis Ordinance, including a variance to the provisions and requirements of the Cannabis Ordinance, with approval at the discretion of the County Planning Commission and Board of Supervisors.

The Project would not require a variance as the cultivation portion of the Project occurs beyond the 30-foot setback requirement from the property line and no sensitive receptors are expected to be affected by the

Project as the nearest sensitive receptor is a residence on an adjacent parcel 686 feet from the cultivation area, also well outside the 350-foot setback requirement for nearby residences.

Discussion of Impacts:

a) The Project does not have the potential to physically divide an established community; the Project does not propose to divide land or rezone the parcel. Access to the site is limited and the land surrounding the property on all sides has similar levels of development. No impact has been identified.

b) The County's General Plan serves as the overall guiding policy document for land use and development. The subject property is designated in the General Plan as Agricultural (A) land and is zoned for Agricultural 20 Acre minimum (A20). The surrounding properties all have the same zoning General Plan land use designation. As the proposed project consists of agricultural related activities onsite, the Project is considered consistent with the County A20 zoning. Additionally, the Project will not conflict with any conservation plans as there is no Habitat Conservation Plan or Natural Community Conservation Plan for the area. There would be no impact.

The Project as proposed complies with the Trinity County Ordinance 315-823, requiring a 350 feet setback from the property line for Type-2 (small, or up to 10,000 square feet of canopy) cannabis cultivation. Based on the proposed uses of the Project, the proposed project does not conflict with the land use designations for the Project site. Therefore, no impacts would occur in this regard.

Mitigation Measures: No mitigation measures are required. Impacts would be less than significant.

Findings: In the course of the above evaluation impacts associated with *Land Use and Planning* were found to be less than significant as the Project is compatible with the current land use designations.

References:

Trinity County. *Cannabis Ordinance No. 315-823.* Enacted October 3, 2017.

———. *Cannabis Ordinance No. 315-829.* Enacted February 6, 2018

———. *Cannabis Ordinance No. 315-830.* Enacted March 6, 2018.

———. *Cannabis Ordinance No. 315-841.* Enacted September 19, 2018.

———. *Cannabis Ordinance No. 315-843.* Enacted March 20, 2019.

XII. Mineral Resources	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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?	☐	☐	☐	☒

Setting:

Mineral production has historically been a significant part of the economy of the County but has waned in the last 75 years. Historically, the County has seen a wide array of mineral production, including asbestos, chromite, copper, sand and gravel, limestone and manganese to name a few. The proposed project site has historically been used for residential, agricultural and timber harvest purposes. The Project area has not been designated by the State or Trinity County as an area of significant mineral resources or an area of locally important minerals.

Discussion of Impacts:

a, b) A mineral resource is land on which known deposits of commercially viable mineral or aggregate deposits exist. The designation is applied to sites determined by the California Geological Survey as being a resource of regional significance and is intended to help maintain any quarrying operations and protect them from encroachment of incompatible uses. The Project would not 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 and would not result in the loss of availability of a locally-important mineral resource recovery site. The site has not been designated as an important mineral resource recovery site by a local general plan, specific plan, or other land use plan or by the State of California. No impact has been identified.

Mitigation Measures: No mitigation measures are required.

Findings: In the course of the above evaluation it was determined that there were no impacts associated with *Mineral Resources*.

References:

California Geological Survey. *Mineral Land Classifications.* 2018.

National Resource Conservation Service. WebSoil Survey. https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx. Accessed: October 30, 2020.

Trinity County. *General Plan Open Space and Conservation Element.*

XIII. Noise	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a. Expose persons to or generate noise levels in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies?	☐	☐	☒	☐
b. Expose persons to or generate excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Setting:

Noise impacts are those that exceed general plan or other local ordinances developed to provide reasonable control of noise to residences, parks, open spaces and other specific designated sites. Noise sources typically include roadways, freeways, schools, industrial and commercial operations and other facilities that can generate noise. The Trinity County General Plan Noise Element and the Cannabis Ordinances provide guidelines and direction for noise sources and attenuation requirements for various uses. Projects proposed for development within the County will have their development evaluated to determine potential conformance with the Noise Element and as necessary, specific conditions of approval will be placed on projects.

In the vicinity of the Project, noise generation sources are varied and consist of vehicle traffic along Summit Creek Road and State Route (SR) 3, and any maintenance and light industrial activities on surrounding parcels. The generally hilly terrain of the area allows noise to travel distance through the canyons, though surrounding vegetation will minimize impacts.

Residential developments, schools and hospitals are considered sensitive noise receptors as these are locations where people sleep or typically expect quiet conditions. Sensitive noise conditions are typically at night and measured as indoor levels in decibels (dB). The nearest sensitive receptor to the Project site is a residence (approximately 638 feet to the north of the property line).

Discussion of Impacts:

a) The nearest offsite sensitive receptor is a residence approximately 686 feet north of the proposed cultivation area. Project-generated noise may be heard at these residences, but normal cannabis operations are not considered a significant noise generation source because the daily activities are generally hand operations with minimal equipment use. The Project will not have any onsite generators, therefore there will be no noise associated with stationary generation devices. Minor

amounts of noise could be generated from an increase in general vehicle trips to and from the site, possibly on a daily basis, which would contrast with current existing conditions on the site and through the area; however, given that the Project site is surrounded by similar properties and comparable operations and would operate only during normal business hours, the Project as proposed would not generate a level of noise that would be considered excessive and will not violate any noise ordinance. Based on the limited scope of the construction, the proximity of the Project to similar types of development, and the distance to the nearest sensitive receptor, implementation of standard conditions of the various cannabis ordinances and review by County for compliance during operations will reduce impacts to less than significant.

b) Ground borne vibrations are usually associated with heavy vehicle traffic (including railroad traffic), and with heavy equipment operations. The proposed project does not include activities that would result in groundborne vibration, such as pile driving or heavy construction equipment. Therefore, there will be no impact.

c) The proposed project is not located within the vicinity of a private or public airport or airstrip. No impacts would occur in this regard.

Mitigation Measures: No mitigation measures are required. Impacts would be less than significant.

Findings: In the course of the above evaluation impacts associated with *Noise* were found to be less than significant.

References:

Environmental Protection Agency, *Noise Effects Handbook.* USEPA, Revised 1981. www.nonoise.org/library/handbook/handbook.htm

Trinity County. *Cannabis Ordinance No. 315-823.* Enacted October 3, 2017.

———. *Cannabis Ordinance No. 315-829.* Enacted February 6, 2018

———. *Cannabis Ordinance No. 315-830.* Enacted March 6, 2018.

———. *Cannabis Ordinance No. 315-841.* Enacted September 19, 2018.

———. *Cannabis Ordinance No. 315-843.* Enacted March 20, 2019.

———. *General Plan Noise Element.* 2003.

XIV. Population and Housing	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a. Induce substantial 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 a substantial number of people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Setting:

Trinity County has a population of approximately 13,786 persons based on the 2010 US Census Data. The median household income is $36,563 per year. Housing throughout the area is primarily individual rural residences on larger parcels of land.

Discussion of Impacts:

a) Implementation of the proposed project would result in the development and use of existing lands, with the installation of a number of new facilities. Two (2) year-round residents are on the site and no seasonal workers are proposed for this Project. Based on the information provided and evaluation of the area, there are no growth-inducing impacts associated with this Project.

b) The Project parcel is currently used for cannabis cultivation with associated structures (i.e. sheds, existing greenhouses). The proposed project would not displace any people or existing housing; the existing housing onsite would be retained for use by two of the permanent residents. No impact has been identified.

Mitigation Measures: No mitigation measures are required.

Findings: Based on the information reviewed for the *Population and Housing* resource, the Project will have no impact.

References:

US Census Bureau. American Fact Finder. https://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml. Accessed: November 2, 2020.

XV. Public Services	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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 following public services:				
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☐	☒
Other public facilities?	☐	☐	☒	☐

Setting:

The Project site is located northeast of central Hayfork, which has public services available to residential, commercial and industrial users. Fire protection is provided to the proposed project site by CALFIRE and the nearest volunteer fire department is the Hayfork Volunteer Fire Department which provides mutual aid services. Law enforcement to the area is provided by the Trinity County Sheriff's Department and the California Highway Patrol. The nearest medical facility is Hayfork Community health Clinic, with full services and capabilities available at Trinity Hospital in Weaverville – about 25.5 miles by road northeast of the proposed project. Hayfork Elementary School serves grades K-8, with Hayfork High School and Valley high School serving the upper grades.

Discussion of Impacts:

Based on available information as well as that provided by the applicant, and observations made on the Project site and in the vicinity, the following findings can be made:

Fire and Police Protection:

Fire and police protection services to the proposed project are currently provided by County, State and Federal agencies and private emergency responders. Development of the Project within the community is not expected to significantly increase the demand for these protection services. A security plan is required for this operation and must be approved by the County Board of Supervisors, as a standard condition of approval, after the Conditional Use Permit is issued. Based on these factors and standard conditions, impacts are considered less than significant.

Schools:

The Mountain Valley Unified School District provides primary and secondary education to students in the area. While the development of this Project could attract employees with families that may have school age children, and those students may contribute to the total student enrollment in these schools, the implementation of the proposed project is not expected to result in a significant increase in the number of school-age children as the two (2) permanent employees have no plans to use other or seasonal employees for the Project operations. Therefore, the potential impacts are considered less than significant.

Parks:

There are no developed parks in the vicinity of the Project site, and the proposed project will not increase the intensity of the land use, impacts to parks and recreational facilities in the Project area would remain at existing conditions; no new residential uses are proposed. The proposed project would not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, there is no impact.

Other public facilities:

As the proposed project does not substantially increase the numbers of people employed in the region and does not create or require new housing or related facilities, an increased demand on public facilities is unlikely to occur. There would be a less than significant impact to other public services related to this Project.

Mitigation Measures: No mitigation measures are required. Impacts would be less than significant.

Findings: Based on the evaluations above for *Public Services* the impacts associated with development of the Project were found to be less than significant.

References:

California Board of Forestry and Fire Protection. *State Responsibility Area Viewer.* https://osfm.fire.ca.gov/divisions/wildfire-prevention-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/. Accessed: November 11, 2020.

Mountain Valley Unified School District. https://www.mvusd.us/. Accessed: November 11, 2020.

Trinity County. *General Plan Safety Element.* Revised March 2002.

Trinity County Office of Education. www.tcoek12.org. Accessed: November 11, 2020.

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

Setting:

There are no developed recreation specific parks or facilities near the Project. The nearest developed site is the Hayfork High School that has play equipment and sports fields, with similar facilities at the other local school sites. Other dispersed recreation facilities are a community pool, campgrounds and wilderness areas.

Discussion of Impacts:

a) The proposed project does not propose to add significant new numbers of people that would require housing and ancillary recreation facilities, therefore the proposed project would not 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) The proposed project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Mitigation Measures: No mitigation measures are required.

Findings: In the course of the above evaluation it was determined that there were no impacts association with *Recreation*.

References:

Trinity County. *General Plan Open Space and Conservation.*

USDA Forest Service, Shasta-Trinity National Forest, Recreation. https://www.fs.usda.gov/recmain/stnf/recreation.

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

Setting:

The Project site is located on private property that has existing access which has a connection to SR-3, the main transportation artery connecting the region to other parts of the County as well as neighboring counties.

The Trinity County General Plan, Circulation Element was last updated in 2002 to address changes to state requirements for regional transportation planning and to address other changes to the Circulation element. The Circulation Element does not address vehicle miles traveled (VMT).

The Governor's Office of Planning and Research (OPR) has developed a screening threshold to determine when detailed analysis is needed due to the potential for a project to generate a potentially significant level of VMT. The threshold states that projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact (OPR, 2018). The proposed project is estimated to generate approximately 24 vehicle/truck trips per day during peak activity and 16 vehicle/truck trips per day during the slowest part of the year. As such, even during the peak activity at the site, the estimated project trips would be below the screening threshold recommended by OPR. For this reason, a detailed analysis of VMT impacts is not included in this Initial Study and it is determined that the project would result in less than significant transportation impacts during operation

Public transit services are provided by the County through Trinity Transit, which provides daily bus service between Weaverville and Redding, Weaverville and Lewiston and Weaverville and Hayfork. Other private transit carriers also operate in Trinity County to provide services to the elderly, disabled, school children and others.

Discussion of Impacts:

a, b) Project approval would allow for the development of various cannabis-related business operations on an existing agricultural site. As this Project does not propose the development of new roads or

easements there is no conflict with the current Circulation Element of the General Plan. The facility is expected to employ two employees, who are also already the permanent residents on the site; this will not cause a significant increase in traffic or require changes to any roadways, public transit, or pedestrian facilities.

Since the proposed project operations could potentially create an increase in general traffic coming to and from the site, possibly on a daily basis, which would contrast with current existing conditions on the site and through the area, this would represent a change in VMT; nevertheless, given that the Project operations as proposed are not unique to this area of greater Hayfork or Trinity County, the impacts are considered less than significant.

c) The proposed project has not proposed any new roads and does not propose or require any realignment of existing roads that might cause hazards to geometric design features or have incompatible uses. No significant hazards are anticipated with the development of this Project; the Project would have a less than significant impact.

d) Adequate existing access is provided to the site with State, County and onsite private roads. The Project does not change the existing access to the Project site; therefore, the ability for emergency vehicles and personnel to access the subject property will remain at existing condition levels upon completion of the proposed project. The Project will be required to comply with State and local Fire Safe Standards and applicable regulations for emergency vehicle access to the Project sites including implementation of requirements by the Trinity County Department of Transportation and as directed by CALFIRE for compliance with State Fire Safe Standards. No impacts are anticipated in this regard.

Mitigation Measures: No mitigation measures are required. Impacts would be less than significant.

Findings: In the course of the above evaluation, impacts associated with *Transportation and Traffic* were found to be less than significant.

References:

Governor's Office of Planning and Research (OPR). 2018. *Technical Advisory – On Evaluating Transportation Impacts in CEQA.*

Trinity County. *General Plan Circulation Element.* Revised 2002.

Trinity Transit. http://trinitytransit.org/. Accessed: November 2, 2020.

XVIII. Tribal Cultural Resources	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 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 § 5020.1(k), or	☐	☒	☐	☐
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 § 5024.1. In applying the criteria set forth in subdivision (s) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☐	☒	☐	☐

Setting:

As previously discussed in Cultural Resources section (Section V) of this document, there are no known prehistoric resources that exist on the subject parcel, or historic disturbances have cleared the area of any evidence of prehistoric use. Mitigation measures have been developed for the potential future location of cultural resources which are also identified in Section V of this document and are considered to be sufficient to protect unknown future tribal cultural resources that may be found at the Project site.

Discussion of Impacts:

Notification under AB 52 was delivered to interested Tribal entities on May 12, 2019. One response was received within the 30-day comment period requesting formal consultation under the provisions of AB 52. Tribal outreach occurred during the development of the Cultural Resources Investigation (Archaeological Research and Supply Company), and those efforts and results are discussed in Section V, Cultural Resources.

a) Based on the results of the consultation effort and the Cultural Resources Investigation report for the proposed project, there are no known historical resources that are listed, or eligible for listing, on the California Register of Historical Resources. Mitigation measures were developed for the potential future location of cultural resources and are identified in Section V of this document. Based on the lack of known resources, impacts are anticipated to be less than significant.

b) Trinity County (as lead agency) has determined that there are no resources present that are considered significant, and no additional mitigation or Project modifications are required. Mitigation

measures for cultural resources are provided in Section V, Cultural Resources section for development of this Project that are considered to be sufficient to protect unknown future cultural resources that may be found at the Project site.

Mitigation Measures: See Mitigation Measure CR-1 and Mitigation Measure CR-2 above in Section V, Cultural Resources, of this document.

Findings: In the course of the above evaluation impacts associated with *Tribal Cultural Resources* were found to be less than significant with mitigation incorporated. Mitigation measures for the protection of currently unknown but discovered resources are provided for in Section V, Cultural Resources.

References:

Archaeological Research and Supply Company. *A Cultural Resources Investigation of the Herron Property, Hayfork, Trinity County, CA.* May 2019.

XIX. Utilities and Service Systems	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	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 stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction 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, that 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?	☐	☐	☒	☐

Setting:

The proposed project has an existing and permitted onsite septic system that disposes of domestic wastewater and is proposing to install a second one to accommodate wastewater from the manufacturing operation. Power is provided to the site by the Trinity Public Utilities District (TPUD) and no additional power sources are proposed for this Project.

The Trinity County Solid Waste Department provides solid waste services at County landfills, with waste disposal by private waste haulers or individuals. Cannabis waste is not permitted at County landfills.

The source of water for the site is currently a surface diversion from an unnamed stream that fills two (2) permitted ponds. The ponds collectively hold an estimated 370,000 gallons, and the diversion is permitted through a water right and Small Irrigation Use Registration (SIUR) which allows them to store water for cannabis use. The SIUR Registration Number is H100243. Approximately 150,000 gallons are used annually for cannabis cultivation. Water Diversion Statements have been filed for this property since 2015. The Statement Numbers are S024799 and S024800. The total estimated water use for both domestic and cultivation purposes is 250,000 gallons, annually. Water for the proposed project would be served by the construction of a rainwater catchment basin. Until this system is developed and operational, the Applicant

proposes to design and install a rainwater catchment system to harvest water from the building roofs. This water will be stored in tanks until the catchment basin is developed in the northeast portion of the property.

Discussion of Impacts:

a) The proposed project has an existing onsite septic system that disposes of domestic wastewater. This system would continue to be utilized for the two permanent workers/residents at the site. The applicant is proposing to install a second one to accommodate wastewater from the manufacturing operation. The Applicant will follow standard County procedures for septic system development as provided for by the Trinity County Department of Environmental Health. It is the applicants' responsibility to continue to provide normal maintenance and repairs to the septic system. There is sufficient power provided by the TPUD to the site for the proposed project, and there are no stationary generators proposed for the Project. Based on the current anticipated uses at the site, impacts would be less than significant.

b) Water for the proposed project would be served by the construction of a rainwater catchment basin. Until this system is developed and operational, the Applicant proposes to design and install a rainwater catchment system to harvest water from the building roofs. This water will be stored in tanks until the catchment basin is developed in the northeast portion of the property. Based on the current anticipated uses at the site, impacts would be less than significant.

c) The proposed project is served by an onsite septic system that is owned by the applicant; there are no impacts to community/public wastewater systems, as there are none in the area. The applicant shall ensure that the existing septic system meets the requirements of Trinity County Environmental Health Department, within 60 days of issuance of the use permit.

d) Non-cannabis solid waste produced by the Project would be disposed of at existing solid waste facilities as other residential and commercial solid waste is currently handled in the County. Sending the solid waste stream to existing permitted facilities, either by existing contract haulers or self-disposal, will ensure that the Project does not violate any federal, State or local statutes related to solid waste. The Project will also develop onsite composting of organic debris from the cannabis cultivation operations, which will reduce the solid waste impact to the landfills. Based on the above, the impact to solid waste services will be less than significant.

e) The County regulates and operates programs that promote the proper disposal of toxic and hazardous materials from households, including those created by the Project. There are no current waste reduction plans or statues in place in the County. However, should they be implemented the proposed project would comply with local statutes and regulations related to solid waste. Less than significant impacts are anticipated in this regard.

Mitigation Measures: No mitigation measures are required. Impacts would be less than significant.

Findings: In the course of the above evaluation impacts associated with *Utilities and Service Systems* were found to be less than significant.

References:

Trinity County Solid Waste. https://www.trintycounty.org/Solid-Waste. Accessed: November 2, 2020.

XX. Wildfire	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of 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 or runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

Setting:

The proposed project is located in an area designated as being in the Very High Fire Hazard Severity Zone (VHFHSZ), as identified by the CALFIRE Fire and Resource Assessment Program (FRAP) Fire Hazard Severity Zones in State Responsibility Areas (SRA) (CALFIRE 2007). However, the majority of land in Trinity County has a designation of VHFHSZ (for both SRA and non-SRA lands) including the existing agricultural parcels in the area surrounding the Project. Fire hydrants in the County are limited to highly developed areas, and none are located in the area of the Project. However, the County General Plan has taken this fact into consideration as a part of the Trinity County General Plan Safety Element. In addition to the local General Plan, the State of California has developed Fire Safe Standards (Public Resource Code Sections 4290 and 4291) which dictate development in rural areas throughout the state, and require vegetation clearing, onsite water storage requirements and other building and development standards.

Discussion of Impacts:

a) Based on the Trinity County General Plan Safety Element, State Route 3 is considered a Major Evacuation Route. As the Project will not significantly impact traffic intensity on the roadway relative to existing conditions, or impair access to the roadway or surrounding properties, the Project is not expected to impair the emergency evacuation plan. Due to the location of the Project the impacts are considered to be less than significant.

b) The Project area has been previously developed and the proposed project does not propose significant changes to the Project site or surrounding property that would exacerbate wildfire risks. Due to the landform of the site occupants could be exposed to elevated concentrations of pollutants from a wildfire as the site sits in a narrow canyon. However, the development of the Project itself is not anticipated to contribute to any significant elevation in risks to occupants from uncontrolled spread of wildfire. Based on past land uses at the site and in the area that have cleared flammable vegetation, including conformance with State and County fire safe standards, the Project will result in impacts that are less than significant.

c) The Project area has been previously developed and the proposed project does not propose changes to the Project site or surrounding property that would exacerbate wildfire risks. Due to the landform of the site occupants would be exposed to elevated concentrations of pollutants from a wildfire as the site sits up high on a hill above the Duncan Creek and Carr Creek valleys. The site's forest canopy is very open and interspersed with open grassland, as well as having very wet areas of emergent wetland surround the two pond areas, and a stand-reducing fire event is not likely even in dry conditions. Additionally, the vegetation character is similar on all the surrounding parcels. The development of the Project itself is not anticipated to contribute to any significant elevation in risks to occupants from uncontrolled spread of wildfire (e.g. the electrical distribution lines will be subterranean, appliances are to be contained within sealed shipping containers, irrigation will be gravity-fed, etc.). Based on past land uses at the site and in the area that have cleared flammable vegetation, including conformance with State and County fire safe standards, the Project will result in impacts that are less than significant.

   The Project does not include the addition of new roads, fuel breaks, emergency water sources, power lines or other utilities. There are three (3) existing and two (2) proposed water storage tanks on the property totaling 16,000 gallons which can be used for fire suppression. There are no temporary or ongoing activities that will exacerbate the fire risk in the area, and as a result impacts are considered less than significant

d) The location of the proposed project does not fall within a FEMA flood zone, nor are there any sheer or unstable cliffs in the immediate area. There is no reason to believe that occupants or structures would be exposed to significant risks from flooding or landslides as a result of post-fire runoff; impacts are considered to be less than significant.

Mitigation Measures: No mitigation measures are required. Impacts would be less than significant.

Findings: Based upon the review of the information above the implementation of the Project will have a less-than-significant impact with respect to *Wildfire*.

References:

California Public Resources Code, Division 4, Forests, Forestry and Range and Forage Lands. Part 2 Protection of Forest, Range and Forage Lands. Chapter 2, Hazardous Fire Areas, Sections 4251-4290.5.

———. Chapter 3, Mountainous, Forest-, Brush- and Grass-Covered Lands, Sections 4291-4299.

California Board of Forestry and Fire Protection. *State Responsibility Area Viewer.* https://osfm.fire.ca.gov/divisions/wildfire-prevention-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/. Accessed: November 2, 2020.

———. *SRA Fire Safe Regulations.* https://www.rsf-fire.org/wp-content/uploads/2016/10/SRAFireSafeRegulations.pdf. Accessed: November 2, 2020.

Trinity County. *General Plan Safety Element.* Revised March 2002.

———. *Parcel Viewer.* http://trinitycounty.maps.arcgis.com/apps/Viewer/index.html?appid=320cf1c1558c43c8b1f2f70c23d35026. Accessed: November 2, 2020.

XXI. Mandatory Findings of Significance	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a. Does the project have the potential to 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?	☐	☒	☐	☐

Based on the analysis undertaken as part of this Initial Study, the following findings can be made:

a) Evaluation of the proposed project in this document (Section IV, Biological Resources) has shown that, with the implementation of the proposed mitigation measures, the potential for the Project as proposes to degrade the quality of the environment and and/or reduce the habitat or cause wildlife populations to drop below self-sustaining levels is less than significant.

Also, based on the discussion and findings in Section V. Cultural Resources, there is evidence to support a finding that the proposed project is not eligible for listing in the NRHP or CRHR under any significance criteria. Considering the history of extensive disturbance within the Project area and its previous uses, the potential for discovery of intact archaeological deposits or features by implementation of this Project is considered low. Although no archaeological deposits or features were found during the Cultural Resources investigation, implementation of mitigation measures will ensure that any additional archaeological deposits or features may be discovered are fully protected during implementation of the Project.

b) As discussed throughout this document, implementation of the proposed project has the potential to result in impacts to the environment that are individually limited, but are not cumulatively considerable, including impacts to air quality, or biological, cultural, and tribal cultural resources.

In all instances where the Project has the potential to contribute to cumulatively considerable impacts to the environment (including the resources listed above) mitigation measures have been imposed to reduce the potential effects to less than significant levels. As such, with incorporation of the mitigation measures imposed throughout this document, the proposed project would not

contribute to environmental effects that are individually limited, but cumulatively considerable, and impacts would be less than significant.

c) Based on the discussion and findings in all Sections above, as well as the incorporation of the proposed mitigation measures, there is the potential of the Project as proposed would cause substantial adverse effects on human beings, either directly or indirectly, is less than significant.

Findings: Based upon the review of the information above, the implementation of the Project is not anticipated to have a substantial adverse effect on the environment. Therefore, there is no significant impact.

The following technical studies, reference documents, and data sources were utilized as primary references in developing the Green Beach Ventures LLC Conditional Use Permit Application Initial Study:

Archaeological Research and Supply Company. *A Cultural Resources Investigation of the Herron Property, Hayfork, Trinity County, CA.* May 2019.

Bay Area Air Quality Management District. *California Environmental Quality Act Air Quality Guidelines.* 2017.

California Air Resources Board. 2013. "Ambient Air Quality Standards." http://www.arb.ca.gov/research/aaqs/aaqs2.pdf.

———. 2017. *Area Designation Maps/State and National.* https://www.arb.ca.gov/permits/permits.htm. Accessed: October 19, 2020.

———. *2017 Climate Change Scoping Plan: The Strategy for achieving California's 2030 greenhouse gas reduction target.* January 20, 2017.

——— *8th Edition, California Greenhouse Gas Emissions Inventory: 2000-2016. California Greenhouse Gas Emissions for 2000 to 2016, Trends of Emissions and Other Indicators.* 2018.

———. 2020. "Top 4 Measurements and Days Above the Standard." http://www.arb.ca.gov/adam/. Accessed: November 7, 2020.

California Board of Forestry and Fire Protection. *SRA Fire Safe Regulations.* https://www.rsf-fire.org/wp-content/uploads/2016/10/SRAFireSafeRegulations.pdf. Accessed: November 2, 2020.

———. *State Responsibility Area Viewer.* https://osfm.fire.ca.gov/divisions/wildfire-prevention-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/. Accessed: November 2, 2020.

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California Department of Pesticide Regulation. *California Code of Regulations, Title 3, Food and Agriculture, Division 6. Pesticides and Pest Control Operations. Chapter 4. Environmental Protection, Subchapter 5. Surface Water, Article 1, Pesticide Contamination Prevention. Section 6960.* https://www.cdpr.ca.gov/docs/legbills/calcode/040501.htm. Accessed: November 7, 2020.

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Caltrans (California Department of Transportation). 2020. "California Scenic Highway Mapping System." http://www.dot.ca.gov/hq/LandArch/scenic_highways/. Accessed: October 27, 2020.

———. "Article 2.5 of Chapter 2 of Division 1 of the California Streets & Highways Code". Sacramento: California Office of Legislative Counsel. http://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=SHC&division=1.&title=&part=&chapter=2.&article=2.5. Retrieved October 27, 2020.

———. "Officially Designated State Scenic Highways and Historic Parkways". Sacramento: California Department of Transportation. https://dot.ca.gov/-/media/dot-media/programs/design/documents/desig-and-eligible-aug2019_a11y.xlsx Retrieved October 27, 2020.

California Geological Survey. 2018. *Fault-Rupture Hazard Zones in California, Special Publication 42, Interim Revision 2018*. Sacramento, California.

———. *Mineral Land Classifications.* 2018.

California Public Resources Code, Division 4, Forests, Forestry and Range and Forage Lands. Part 2 Protection of Forest, Range and Forage Lands. Chapter 2, Hazardous Fire Areas, Sections 4251-4290.5.

———. Chapter 3, Mountainous, Forest-, Brush- and Grass-Covered Lands, Sections 4291-4299.

Down River Consulting. Biological Assessment, Green Beach Ventures LLC/Frog Pond Legacy, LLC, 324 Frog Pond Lane, Hayfork, CA 96041. May 2019. Addendum: November 25, 2020.

Federal Emergency Management Agency. 2010. *Flood Insurance Rate Map (FIRM), Map Number 06105C1035F, Revised July 20, 2016*.

Governor's Office of Planning and Research (OPR). 2018. *Technical Advisory – On Evaluating Transportation Impacts in CEQA.*

Johnson, T.D., and Belitz, Kenneth. 2014. *California Groundwater Units: U.S. Geological Survey Data Series 796, 34 p.* https://dx.doi.org/10.3133/ds796. ISSN 2327–638X.

Mountain Valley Unified School District. https://www.mvusd.us/. Accessed: November 11, 2020.

National Resources Conservation Service. *WebSoil Survey.* https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx. Accessed: October 30, 2020.

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State Water Resources Control Board. *Geotracker Database.* 2019.

Trinity County. *Cannabis Ordinance No. 315-823.* Enacted October 3, 2017.

———. *Cannabis Ordinance No. 315-829.* Enacted February 6, 2018

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Attachment A

Odor Control Plan

Mark Herron, Green Beach Ventures LLC
Trinity APN 017-010-80
Application for a Commercial Cannabis Cultivation License
Zone: Agricultural 20 Acre min (A20); General Plan: Agricultural (A)

Odor Mitigation Plan

Introduction

Green Beach Ventures LLC will take active measures to eliminate any cannabis odor that may potentially emanate from any facility or component of this cannabis operation to mitigate and eliminate possible disturbances. There are several industry best practices that we will install into our operation to ensure that the air poses zero health risks to any employee, visitor, our surrounding neighbors/community/residents. The multiple layers of odor control that Green Beach Ventures LLC will install will be more than sufficient to mitigate all odors produced. These include redundant carbon filtration located throughout the facility, negative pressure in all cannabis related zones, odor ionizing technology, and employee standard operating procedures.

The following pages describe our hardware and systems, procedural activities, staff training processes, record keeping protocol for all aspects of our odor control policy, and rigorous maintenance, updates, and regular scheduled monitoring for all aspects of our odor control plan. Any air that is emitted from the operation will be carbon filtered, passed through an ozone generator, as well as bi-polar ionized. Green Beach Ventures LLC will ensure that no airborne emissions will be emitted that are readily detectable offsite without instruments by the average person.

Client Specific Activities

324 Frog Pond Lane, Hayfork, California. The Project is surrounded by similar private properties with comparable land uses, including many already having various large industrial structures such as shops, garages and warehouses, immobilized recreational vehicles and trailers, outbuildings and scattered debris. The Project parcel itself—and notably the proposed Project area on the parcel—is situated topographically higher in altitude than all but one of the neighboring/adjacent parcels such that the Project site is not directly visible to offsite viewers. The Project site is not adjacent to any historic sites; therefore, the Project is unable to adversely affect a scenic resource (Trinity County GIS). The existing built environment in the vicinity of the proposed project includes both public and privately maintained access roads, scattered residential buildings, and a variety of associated rural structures. The proposed project site has the same general features as surrounding parcels, including an existing cannabis cultivation area and a variety of above and below ground utility services. The nearest residence (offsite) is

located approximately 686 feet (0.13 mile) northeast of the Project area.

The proposed project is located approximately 5.61 air miles northeast of the community of Hayfork and 8.96 air miles southwest of Junction City up on a promontory above where Duncan Creek enters Carr Creek valley – a tributary of Hayfork Creek, which drains to the South Fork Trinity River at a confluence approximately 18.7 air miles to the northwest at the community of Hyampom.

The County has not designated specific scenic vistas in the immediate Project area as a part of the General Plan and there are no designated State or federal scenic highways or scenic highway corridors in the vicinity of the Project (California Department of Transportation, California Scenic Highway Mapping System).

Any complaints about odors will likely be due to the odor emitted by the cannabis plants two weeks into flower. Before this time, the plant has not matured enough to emit an odor. From this second week of flower until the plant has been packaged is the heaviest odor emitting period. Terpenes released during this stage of development are responsible for the strong odor. This will be how the smell wafts to neighbors and bystanders. Drying and cutting cannabis for processing as well as composting can emit heavy amounts of terpenes into the air. Wind currents then can possibly carry these smells far enough from the property for others to smell it.

If the filtration system of the greenhouse does not prove adequate, biological measures that could be put in place to reduce the cannabis aroma. This can include planting thyme, peppermint, mint, and lavender around the property to mask to the strong smell of cannabis. These plants would be able to possibly act as a natural filter for the cannabis terpenes.

Background

As cannabis plants grow, they release a distinctive range of odors which are made up of different types of volatile organic compounds (VOCs) called terpenes. Activities during the production, harvest, post-harvest, waste, and composting cycles all release significant odors. Installing a range of control technologies that reduce the amount of all strong odor emissions released during all stages of cannabis production as well as the correct operation, maintenance, staff training, record keeping and following the best management practices detailed in this document are the means to a successful odor mitigation plan for reducing air quality impacts from a cannabis operation.

Carbon Filtration

Carbon filtration is currently the best control technology for reducing all odor emissions from cannabis cultivation facilities. These filters work by using an absorption process where porous carbon surfaces chemically attract and trap volatile organic compounds VOCs along with other gas phase contaminants. The Active Carbon Filters absorbs its molecular weight of contaminants with which it comes in contact. Adsorption is a distinct process where organic compounds in the air react chemically with the activated carbon, which causes them to stick to

the filter. The more porous the activated carbon is, the more contaminants it will capture. Depending on the filter system, carbon filtration can remove 50% - 98% of VOCs. As the filter ages, less carbon surface area is available to trap VOCs; at this point the filter will need to be replaced. Depending on the filter load, most carbon filters will last 6-12 months in a commercial cultivation environment and will be replaced according to the manufacturer's recommendations.

An effective filtration system must be properly sized according to the space needed for volume and air-flow requirements. It is important to not exceed the maximum rated cubic feet per minute rating for air circulation through the filter. If one exceeds this max flow rate, the passing air will not have enough "contact time" with the carbon, and the filter will not be effective at removing odor. Carbon filters will be used in combination with other odor control technologies.

Ozone Generation
Ozone generators use ultraviolet bulbs or corona discharge (an electrical discharge) to produce ozone gas that works on a molecular level to eliminate virtually all odor. Ozone can be used safely and efficiently by utilizing generators that fit directly into exhaust lines and is one of the most effective methods for removing odors.

Bi-Polar Ionization
Plasma Air Systems Odor Control: The ions produced by Plasma Air units break down gases with electron-volt potential numbers below 12 to harmless compounds prevalent in the atmosphere such as oxygen, nitrogen, water vapor and carbon dioxide. The resultant compounds are a function of the entering contaminants into the plasma field. In this case the VOC's or terpene odors generated by the cannabis breaks down to carbon dioxide, nitrogen, and water vapor, thus eliminating the odor.

Procedures
The procedures highlighted in the Green Beach Ventures LLC Odor Mitigation Plan will be applied to the following odor-emitting areas of activity:

- 3,500 ft² engineered and County-approved greenhouse;
- 15'x50' Cannabis waste composting area located to the northeast of the garden;
- A portion of a 24'x94' shop/garage currently used for drying and processing the plants once harvested;
- Two (2) 10'x40' shipping containers used for drying;
- Two (2) 10'x40' shipping containers used for processing;
- Nursery housed in in one (1) 35'x100' year-round greenhouse;
- One (1) 10'x40' shipping container for distribution; and
- Type 6 (non-volatile) manufacturing operation located in a 10'x20' shipping container.

I. *Staff training procedures*: Green Beach Ventures LLC has an extensive training program that includes training specifically for odor mitigation. Standard Operating Procedures related to this odor mitigation plan will be part of monthly staff meetings as well as the review of odor data, maintenance schedules, and possible updates to the system.

II. *Record keeping:* Carbon filter report cards will be maintained and filled out after every change by staff on duty. Green Beach Ventures LLC will have a supply of carbon filters on site that will be re-ordered as part of SOPs to keep aligned with the facility maintenance program. If a filter needs to be changed sooner extra filters will be on site to do so. If maintenance is needed it will be performed immediately as to not affect the surrounding areas and the Odor Mitigation plan.

III. *Monitoring and inspection:* Every odor emitting zone will be continuously monitored using a "scentometer" or Nasal Ranger to be able to quantify odors and record "defensible data" from self-testing. If a high volume of odor is detected, precise and accurate responses will be performed to achieve set odor goals. Doors will be installed with automatic closing equipment to ensure no odor is released through open doors.

IV. *Technical system design and equipment installation:* Ionization and active carbon filtering will be installed to mitigate odors within the facility. To the extent possible, the odor mitigation will be intended to mitigate odor migration to the outside of the building and surrounding areas. Each grow room will be designed to create negative air pressure within the growing environment. This essential component to our odor control system isolates odors and does not allow them to escape from their respective grow areas. (For zones where HVAC systems are used a closed-loop system with limited exhaust will used.)

A. *Odor Control*:

1. Cultivation areas: Each cultivation area will have adequate high efficiency, high CFM carbon filtration, ozone generation, and bi-polar ionization systems. Flowering areas are by far the highest odor producing rooms in cannabis cultivation. Therefore, extra precautions will be taken for each flowering area. Each flowering area will have appropriate cubic feet per minute (CFM) of air filtration along with finely tuned negative air pressure, ozone generation, and bi-polar ionization technology.

2. Common areas: High efficiency carbon filtration units will be installed throughout the common areas of the along with bi-polar ionization units. These units will be changed out and maintained on a fixed schedule as identified in the SOPs.

3. Drying, trimming, storage, and packaging areas: These areas will utilize carbon filters and bi-polar Ionization units for odor mitigation.

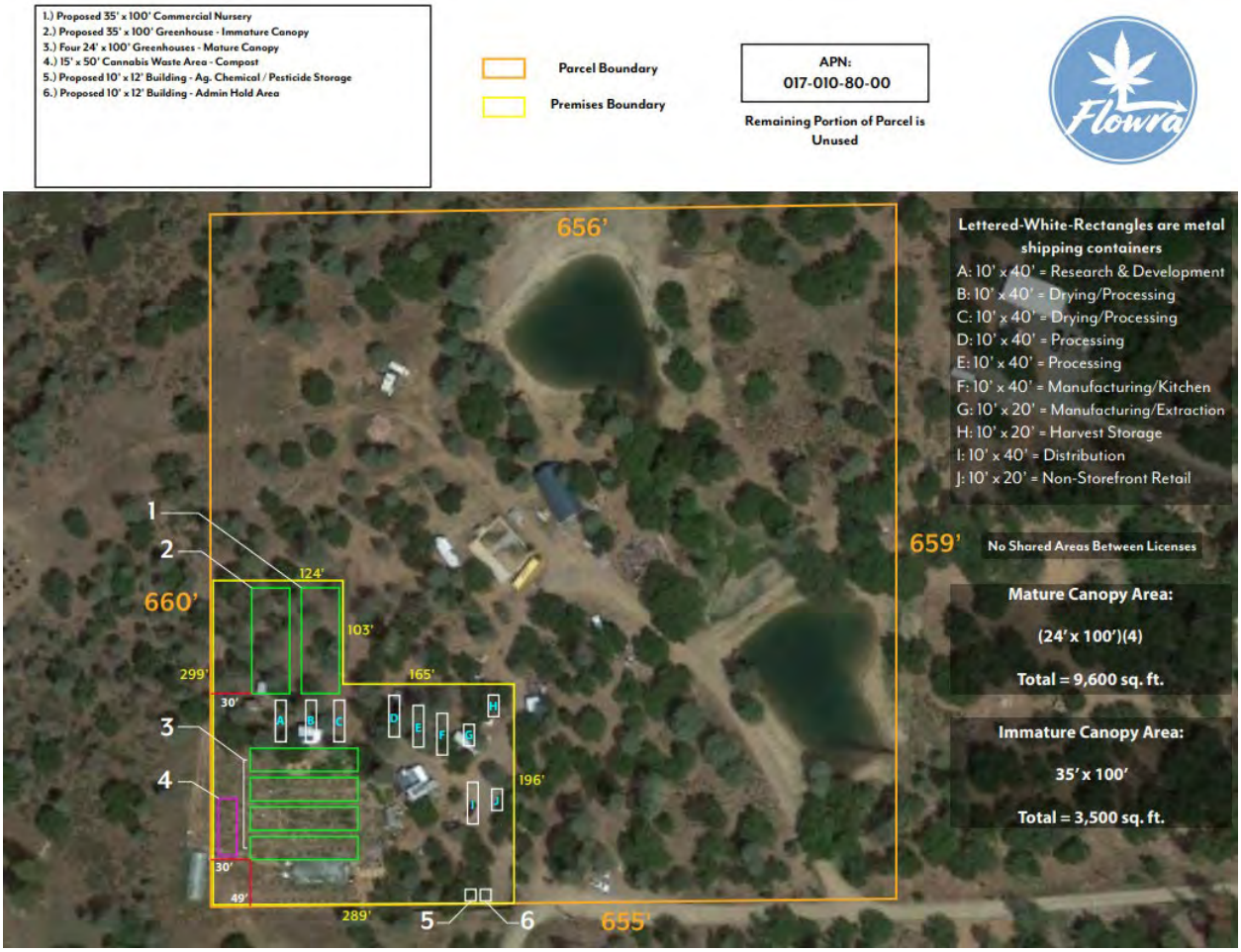
B. *Staff Training*: Staff training will be comprehensive and specifically tailored for maximum odor control and will include understanding of the odor management system, basic maintenance, and record keeping with the following being key components.

1. How different odor controls tools, equipment, and products work

2. Safety concerns related to odor control
3. Mastering effective odor control strategies
4. Odor systems maintenance
5. Strategies to actively reduce odor
6. Record keeping and data collection

Summary

Early strategic planning is the key to effective odor control for cannabis operations. Green Beach Ventures LLC will use a matrix approach to controlling odor—leveraging both mechanical means to control odors, as well as filters, ozone generators, and bi-polar ionization. All of this will be supplemented with a rigorous training program and systems in place to ensure all items are properly documented.



Composting of Solid Cannabis Waste Plan

Green Beach Ventures LLC is committed to a composting approach that prevents the diversion of THC-containing materials from the site, protects the health and welfare of the community, mitigates the risk of water or air pollution, prevents the spread of disease, and conserves natural resources. The composting operation will strictly adhere to the detailed Green Beach Ventures LLC Odor Mitigation Plan and ensure that all stages of the composting protocol will non-impact air quality.

Green Beach Ventures LLC will maintain accurate and comprehensive records that account for and reconcile all waste activity related to the composting of cannabis and cannabis products. All composting of cannabis waste on the licensed premises will be done in compliance with state requirements.

Cannabis Waste: Refers to any part of the cannabis plant that is unusable or unprocessable, as well as expired or contaminated plant material, diseased or infested cannabis plants, and harvested cannabis that does not meet the testing standards of the regulating authority and cannot be remediated. This term also applies to solid derivative products containing cannabis that are to be discarded for any reason.

Green Beach Ventures LLC will take active measures to prevent diversion, misuse, loss or contamination of its cannabis waste by implementing the following procedures:

Minimize Excess Production: Green Beach Ventures LLC will not produce or maintain quantities of cannabis in excess of what is needed for normal, efficient operation and to anticipate client needs.

Monitored and Quarantined Storage: Prior to composting, cannabis waste will be securely stored in a locked compartment in an area under video surveillance and kept quarantined from all usable cannabis in order to prevent contamination.

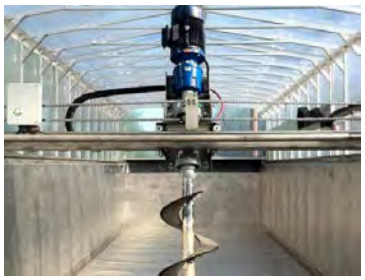
Odor Control: As explained in the Green Beach Ventures LLC Odor Mitigation Plan our composting protocol and system will be enclosed and equipment with all the needed technology to render air leaving the composting enclosed bin odor free.

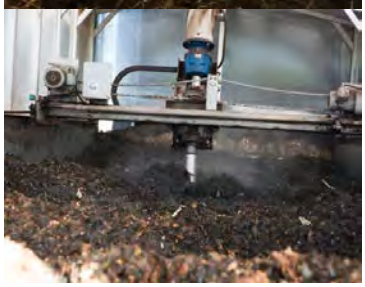
Pest Management: Composting can be a somewhat tricky process to successfully render the organic material into a state which can actually be beneficial to reuse. Therefore, at Green Beach Ventures LLC we will be using a composting bin that has a quick turnaround time of 14-21 days to create a finished compost

product that achieves a pathogen-free substrate by heating compost to temperatures of ~131 degree F.

Inventory Control: All cannabis waste entered into the composting system will be recorded in the ICS, including the date and time of compost initiation, the employee or manager responsible.

Composting of Solid Cannabis Waste





- All cannabis that is not usable for composting will be disposed of within ten calendar days of expiration or removal from the regular inventory.

- Mixing will be overseen by a trained authorized employee in a limited access area.

- Cannabis waste to be composted will be securely stored in a limited access area prior to and after mixing.

- Immediately prior to mixing, all cannabis waste will be weighed on a calibrated certified scale that is integrated with the ICS.

- Cannabis waste will be ground up and incorporated with allowed combustible solid waste or other organic materials to a resulting mixture that is at least 50% non-cannabis waste by volume.

1.) Proposed 35' x 100' Commercial Nursery
2.) Proposed 35' x 100' Greenhouse - Immature Canopy
3.) Four 24' x 100' Greenhouses - Mature Canopy
4.) 15' x 50' Cannabis Waste Area - Compost
5.) Proposed 10' x 12' Building - Ag. Chemical / Pesticide Storage
6.) Proposed 10' x 12' Building - Admin Hold Area

An odor control system similar to the diagram below will be installed inside the compost bin.

Attachment B

Biological Assessment

Biological Assessment

Green Beach Ventures LLC/Frog Pond Legacy, LLC

324 Frog Pond Lane, Hayfork, CA 96041

Trinity County, CA

Prepared for:

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Introduction

The purpose of this report is to provide an initial analysis of the potential for threatened, endangered, and/or sensitive (TES) biological resources to occur on the proposed commercial cannabis sites that are applying for nursery, distribution, and nonvolatile manufacturing licenses. Initial assessments of the property focused on habitat types present and not species-specific or protocol-level surveys. This report was prepared with the following elements: introduction, project description, environmental setting, methodology, and the analysis of a nine quad search result. A list of impact mitigations is included.

Environmental Setting

Due to the small property size and intensity of the proposed operations, the entire property was considered to be the action area. The property is located on the eastern aspect of Hayfork Valley, within the Carr Creek watershed, just south of the confluence of Duncan Creek and Carr Creek. Soils at this site are well-drained, and consist of interbedded lenses of loam, gravelly clay loam, gravelly sandy clay loam, and clay loam. These soils are classified as moderately erosive with a K-value of 0.37, and have a hydrological class rating of C[1]. Soils here are a resultant alluvium derived from igneous, metamorphic, and sedimentary rocks[1].

Geologically, the property is located on the Weaverville Formation, and is composed of sandstone and conglomerate from the Oligocene to Miocene epochs. Upland, to the south of the property, accreted formations from the Eastern Hayfork terrane dominate, which are composed of argillite and chert from the Devonian to Jurassic periods. The property is bounded by two faults, one is located approximately less than 3,000 feet to the south, and another major thrust fault is located less than a mile away to the southwest. The thrust fault separates the Western Hayfork terrane from the Eastern Hayfork terrane, near Hayfork Creek. These faults are not active[2].

The dominant tree canopy is primarily composed of Oregon white oak (*Quercus garryana)* and codominant ghost pine (*Pinus sabiniana)*, with an understory of manzanita (genus Arctostaphylos) and ceanothus (Rhamnaceae family). This site has low soil water availability and appropriately spaced vegetation. This area receives an annual average of 37 precipitation inches, with most of it falling in the spring and winter months[2].

Project Description

There are six (6) components of this project, as described below.

(1) The property is currently licensed to cultivate up to 10,000 ft² of mixed light cannabis canopy. The current garden is located on the southwest portion of the property. Small tunnel-style primitive hoop houses are used to cultivate with light deprivation and the plants are accessed from the sides of these structures, not from within. Green Beach Ventures (GBV) plans on transitioning to permanent, permitted greenhouses for their mature plant canopy. GBV houses its immature plants on-site. Moving forward, the immature plants will be housed within four (4) shipping containers (40' by 10'). There is an area dedicated to composting of organic cannabis waste located to the northeast of the garden. A portion of a

[1] Natural Resource Conservation Service. (2019). *Web Soil Survey*. (S. S. Staff, Producer) From https://websoilsurvey.sc.egov.usda.gov/aspx

[2] United States Geological Service, 2010.

24' by 94' shop/garage is currently used for drying and processing the plants once harvested. In the future, the plants will be processed in four (4) separate shipping containers. A 40' by 10' shipping container will be used for drying and two (2) 20' by 10' shipping containers will be used for processing.

(2) GBV has applied for a non-storefront retail license. The initial premises will be located in a room in the shop/garage. In the future, the premises will be located in a 40' by 10' shipping container.
(3) The nursery will be housed in two (2) 40' by 10' shipping containers and a greenhouse (either 96' by 120' or 96' by 144'). One shipping container will house cannabis clones and the other will house mother plants. The plants will be transferred to the greenhouse prior to selling to licensees.
(4) The proposed distribution facility will consist of one (1) 40' by 10' shipping container.
(5) GBV is proposing a Type 6 (non-volatile) manufacturing operation, which will be located in a 40' by 10' shipping container.
(6) A permitted dwelling is in the process of being built on the property. There is a permitted garage, septic system, and two (2) ponds on-site.

Required Site Improvements (Construction Activities)

The proposed development activities will be infrastructure development in the southwestern section and a rainwater catchment pond in the northeast section of the property. To house the proposed licenses types, GBV will need to have thirteen (13) 40' by 10' and two (2) 20' by 10' shipping containers delivered to the property. All containers will have permitted electricity. The manufacturing container will also have permitted plumbing. A new septic system will be installed to accommodate waste from this facility.

Electrical lines will be extended, underground, to the new shipping containers and greenhouses.

Due to the site's gentle topography, grading and heavy equipment use in the infrastructure development zone will be minimal and will not require a Trinity County grading permit; however, an excavator will be used to construct the pond. Heavy equipment will be operated by a licensed contractor and construction will occur during the dry season (April 15 to October 15).

The pond will be constructed with less than a 1.5:1 slope, which will be compacted to a firm and unyielding surface. The pond will be lined with a clay liner. An emergency spillway and wildlife escape ramp will be included in the pond design. A grading permit will be obtained prior to construction of the pond.

Description of Project Operations

GBV is a family-run business. As the licenses are obtained, they expect to hire an additional two (2) to four (4) full-time employees, making the staff a total of eight (8). Additionally, it is anticipated that an additional four (4) seasonal employees will be hired from May through October. Non-family member employees will not live on-site. Temporary sanitation facilities will be brought in as needed to accommodate temporary employees.

The water source for the farm is a surface diversion from an unnamed stream that fills two (2) permitted ponds. The ponds hold an estimated 370,000 gallons, cumulatively. There is a Small Irrigation Use Registration (SIUR) which allows them to store water for cannabis use. The SIUR Registration Number is H100243. Approximately 150,000 gallons are used annually for cannabis cultivation.

Water Diversion Statements have been filed for this property since 2015. The Statement Numbers are S024799 and S024800. The total estimated water use for both domestic and cultivation purposes is 250,000 gallons, annually.

Water conservation methods will include drip irrigation, keeping the plants small, covering the greenhouses with shade cloth, and using irrigation timers.

Power is supplied by the Trinity Public Utilities District (TPUD). There are two (2) 3-phase (3PH) power poles on the property and GBV is in discussions with TPUD about bringing 3-phase power to the property. In addition, GBV plans to install solar panels on the roofs of the barn and home.

The property is accessed via Summit Creek Road and Frog Pond Lane. Frog Pond Lane has a native surface. It is a shared private road and is in need of maintenance. The interior access road has a rocked surface. There are approximately 400 feet (4,800 ft^2) of road on the property. The road is 12-feet-wide and it has a 4% grade.

This is not a hazardous materials site.

Distribution

The distribution facility will have full climate control. Product will be stored in totes on shelves. The planned capacity is 1,500 to 2,000 pounds of processed cannabis. If the need arises for more space, an additional shipping container will be added.

Nursery

The nursery facility will consist of two (2) 10' by 40' shipping containers and one (1) 40' by 120' greenhouse. Cloning and research and development will occur in the shipping container. When weather allows, the immature plants will be moved to the greenhouse.

Manufacturing

The manufacturing facility will consist of one (1) 10' by 40' shipping container. GBV plans to manufacture cannabis-infused bath bombs, lotions, balms, and edibles.

Environmental Commitments

In order to preserve oak woodland habitat resources, all oak trees with a 16" DBH or with a secondary (2°) cavity, such as a basal hollow, will be retained for nest and denning habitat. Shipping container placement was chosen based on oak tree retainment plans. Five Oregon white oak (*Quercus garryana*) trees are slated for removal. The trees will be cut with chainsaws.

Table 1: Diameter at Breast Height (DBH) of Oaks in Development Area

Oak ID	DBH (inches)	Location	Action
1	25.2	Shipping Container Area	Retain
2	**12.8**	**Shipping Container Area**	**Cut**
3	36.1	Shipping Container Area	Retain (2°Cavity)
4	16.2	Shipping Container Area	Retain
5	**13.7**	**Shipping Container Area**	**Cut**
6	33.2	Shipping Container Area	Retain
7	**16.9**	**Shipping Container Area**	**Cut (dying/little habitat value)**
8	31.3	Shipping Container Area	Retain
9	18.8	Shipping Container Area	Retain
10	16.9	Shipping Container Area	Retain (2° Cavity)
11	31.1	Shipping Container Area	Retain
12	17.9	Shipping Container Area	Retain
13	22.8	Shipping Container Area	Retain
14	**11.4**	**Shipping Container Area**	**Cut**
15	32.2	Shipping Container Area	Retain
16	**12.5**	**Shipping Container Area**	**Cut**
17	24.4	Pond	Retain
Total			**Cut 5**

Figure 1: Oak 1- Retain

Figure 2: Oak 2- Cut

Figure 3: Oak 3- Retain

Figure 4: Oak 4- Retain

Figure 5: Oak 5- Cut

Figure 6: Oak 6- Retain

Figure 7: Oak 7- Retain

Figure 8: Oak 8- Retain

Figure 9: Oak 9- Retain

Figure 10: Oak 10- Retain

Figure 11: Oak 11- Retain

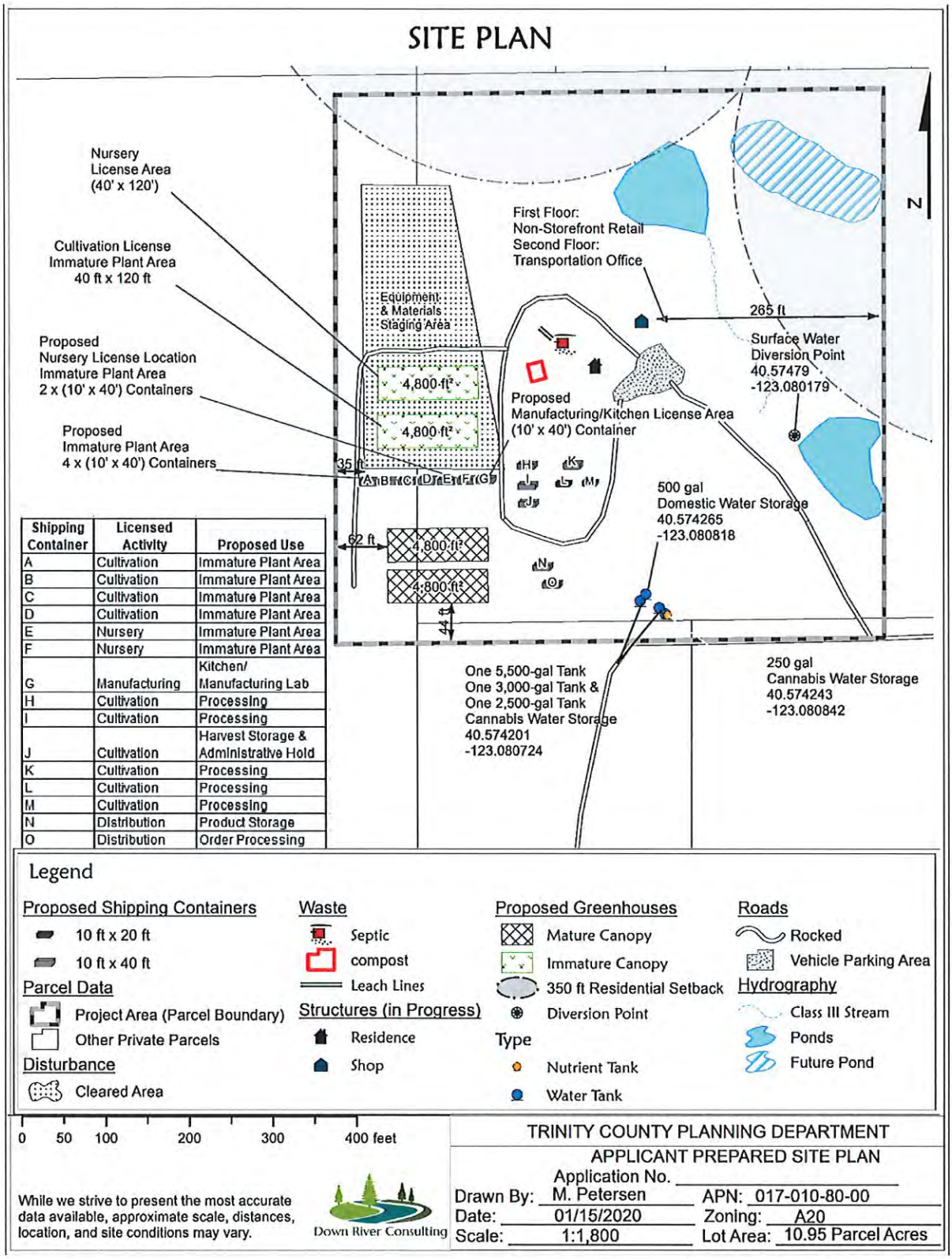
Figure 12: Oak 12- Retain

Figure 13: Oak 13- Retain

Figure 14: Oak 14- Cut

Figure 15: Oak 15- Retain

Figure 16: Oak 17- Retain



Shipping Container	Licensed Activity	Proposed Use
A	Cultivation	Immature Plant Area
B	Cultivation	Immature Plant Area
C	Cultivation	Immature Plant Area
D	Cultivation	Immature Plant Area
E	Nursery	Immature Plant Area
F	Nursery	Immature Plant Area
G	Manufacturing	Kitchen/ Manufacturing Lab
H	Cultivation	Processing
I	Cultivation	Processing
J	Cultivation	Harvest Storage & Administrative Hold
K	Cultivation	Processing
L	Cultivation	Processing
M	Cultivation	Processing
N	Distribution	Product Storage
O	Distribution	Order Processing

Figure 17: Project Detail Map

Method

For the purposes of this evaluation, special-status plant species include vascular plants that are:

- Designated as Species of Greatest Conservation Concern by the California Department of Fish and Wildlife (CDFW, formerly known as the California Department of Fish and Game [CDFG]), or the U.S. Fish and Wildlife Service (USFWS), or are listed as threatened or endangered under the California Endangered Species Act (CESA) or the federal Endangered Species Act (ESA); and
- Vascular plants and non-vascular plants on the California Native Plant Society (CNPS) Lists 1, 2, 3, or 4; and
- Although special status non-vascular plants were not surveyed for, a list of previously recorded occurrences of these plants are listed in Table 1.

For the purposes of this evaluation, special-status animal species include animals that are:

- Designated as Species of Greatest Conservation Concern by the California Department of Fish and Wildlife (CDFW, formerly known as the California Department of Fish and Game [CDFG]), or the U.S. Fish and Wildlife Service (USFWS), or are listed as threatened or endangered under the California Endangered Species Act (CESA) or the federal Endangered Species Act (ESA); and
- Animals on the CNDDB Species of Greatest Conservation Concern, Special Animals List; and
- Animals that occur within Trinity County and are ranked as G1 or G2 but have not yet been ranked by the State of California.

The resources that were reviewed prior to the field survey are:

1. CNDDB May, 2018 dataset
2. FS TES, Wildlife, Serpentine and Limestone Data (USDA Forest Service, 2018)
3. USGS Geology Spatial Data
4. NRCS Soil Survey
5. NSO nest data created for the Trinity County Land Assessment Project (Combined USFS and CNDDB nest data) (Sheen, 2018)
6. USFWS Ray Davis NSO Habitat Suitability Data (United States Fish and Wildlife Service, 2011-2012)
7. NMFS Data KMZ and Spreadsheet (National Marine Fisheries Service, 2016)
8. CalFlora What Grows Here 3 (CalFlora, 2018)
9. CalFlora CNPS (CalFlora, 2018)
10. Jepson Manual 2nd Edition (Baldwin, 2012)
11. California Herps (Nafis, 2000-2016)
12. Barry Roth Research Gate Research Items (174)
13. Other wildlife references
14. Regulatory references

A nine quad search was performed to determine which TES species may occur within the study area. The project area is in the Hayfork Summit USGS 7.5 quadrangle. Using the select by location tool, all CNDDB and USFS TES observation data was selected within the selected quad. The selected attribute table data was

exported using the summary tool. The resultant tabular data was converted to an excel file to be used throughout the study.

The likelihood and/or presence of each species occurring within the project location(s) was analyzed using the following criteria:

- Not Suitable: The project area and vicinity is obviously unsuitable for the target species.
- Low Suitability: Most of the habitat conditions are not found on or adjacent to the project, or this site is outside of the known range. Most of the area is not suitable to provide habitat. The species is unlikely to be observed on-site.
- Moderate Suitability: Some of the known habitat conditions are found on or adjacent to the project areas. The species is moderately likely to be found on the site.
- High Suitability: All known habitat conditions exist on-site or adjacent to the site. The species is highly likely to be found on the site.
- Observed On-Site: The species was observed during a survey or there is a known occurrence on-site.

Table 2: Nine Quadrangle Threatened, Endangered & Sensitive Plant Occurrences

Scientific Name	Common Name	Habitat Description	Habitat Suitability	Listing	Ranking
Boechera serpenticola	serpentine rockcress	Serpentine ridges, talus, lower montane coniferous forests, and upper montane coniferous forests. Elevations between 3,605 and 6,890 feet (1,095-2,100 m).	Not Suitable	None	G1 S1 1B.2
Chaenactis suffrutescens	Shasta chaenactis	Unstable, sandy to rocky, generally serpentine soils, scree, and drainages. Elevations between 2,297 and 7,546 feet (700-2,300 m).	Not Suitable	None	G3 S3 1B.3
Epilobium oreganum	Oregon fireweed	Bogs, small streams, lower montane coniferous forests, meadows, seeps, and upper montane coniferous forests. Elevations between 1,804 and 5,905 feet (550-1,800 m).	Moderate Suitability	None	G2 S2 1B.2
Eriastrum tracyi	Tracy's eriastrum	Open areas on shale or alluvium, chaparral, cismontane woodland, valley, and foothill grasslands. Elevations between 1,312 and 3,281 feet (400-1,000 m).	High Suitability	S-Rare	G3Q S3 3.2
Erythronium revolutum	coast fawn lily	Streambanks, wet places, bogs, fens, broad-leafed upland forests, and North Coast coniferous forests. Elevations up to 5,250 feet (1,600 m).	Moderate Suitability	None	G4G5 S3 2B.2
Harmonia doris-nilesiae	Niles' harmonia	Serpentine slopes, openings, and rocky areas. Chaparral, cismontane woodland, and lower montane coniferous forests. Elevations between 2,625 and 5,250 feet (800-1,600 m).	Not Suitable	None	G2G3 S2S3 1B.1
Harmonia stebbinsii	Stebbins' harmonia	Serpentine, chaparral, and lower montane coniferous forests. Elevations between 1,312 and 5,184 feet (400-1,580 m).	Not Suitable	None	G2 S2 1B.2
Juncus dudleyi	Dudley's rush	Wet areas in (lower) montane conifer forests. Elevations under 6,562 feet (2,000 m).	Moderate Suitability	None	G5 S1 2B.3
Limnanthes floccosa sp. floccosa	woolly meadowfoam	Vernally mesic, chaparral, cismontane woodland, valley and foothill grassland, and vernal pools. Elevations generally below 1,965 feet (595 m).	Moderate Suitability	None	G4T4 S3 4.2
Sedum laxum sp. flavidum	pale yellow stonecrop	Serpentinite and volcanic, broad-leafed upland forests, chaparral, cismontane woodland, lower montane coniferous forests, and upper montane coniferous forests. Elevations between 2,624 and 6,561 feet (800-2,000 m).	Not Suitable	None	G5T4Q S4 4.3
Sedum obtusatum sp. paradisum	Canyon Creek stonecrop	Granite outcrops, meta-volcanic outcrops, and siltstone. Elevations between 984 and 4,593 feet (300-1,400 m).	Not Suitable	None	G4G5T3 S3 1B.3

Table 3: Nine Quadrangle Threatened, Endangered & Sensitive Animal Occurrences. Note: Species with "Not Suitable" habitat suitability will not be discussed any further in this report.

Scientific Name	Common Name	Habitat Description	Habitat Suitability	Listing	Ranking
Ancotrema voyanum	hooded lancetooth	Near streams or intermittent stream channels with permanently damp substrates. Late successional conditions such as large woody debris, riparian hardwood trees, deep leaf mold, and a relatively closed forest canopy. Often associated with limestone and usually within 650 to 3,150 feet (198-960 m) in elevation.	Low Suitability	None	G1G2 S1S2 None
Aquila chrysaetos	golden eagle	Partially or completely open country, especially around mountains, hills, and cliffs. They use a variety of habitats ranging from arctic to desert, including tundra, shrublands, grasslands, coniferous forests, farmland, and areas along rivers and streams.	Moderate Suitability	None	G5 S3 FP;WL
Ascaphus truei	Pacific tailed frog	Adults are aquatic, occupying the streams needed by their eggs and tadpoles. Adults may use thermal microhabitats to avoid warm water temperatures. After heavy rains or dews, adults may be found in moist woods.	Not Suitable	None	G4 S3S4 SSC

Atractelmis wawona	Wawona riffle beetle	Cool, small to medium-sized mountain streams in aquatic bryophytes, specifically in mosses growing between 2,000 and 5,000 feet (610-1,524 m) in elevation. The greatest number of specimens have been detected in the moss species *Platyhypnidium riparioides.*	Not Suitable	None	G1G3 S1S2 None
Chaetarthria leechi	Leech's chaetarthrian water scavenger beetle	This species burrows in sand at the margins of streams and rivers, where there is little silt, the water is quiet, and there is abundant vegetation.	Not Suitable	None	G1? S1? None
Corynorhinus townsendii	Townsend's big-eared bat	Forested and open (edge) habitat. Hibernates/maternal colonies in (limestone) caves and mines near entrances.	High Suitability	None	G3G4 S2 SSC
Emys marmorata	western pond turtle	Ponds, lakes, rivers, streams, creeks, marshes, and irrigation ditches with abundant vegetation, and either rocky or muddy bottoms, in woodlands, forests, and grassland. In streams, prefers pools to shallower areas. Logs, rocks, cattail mats, and exposed banks are required for basking.	High Suitability	None	G3G4 S3 SSC
Erethizon dorsatum	North American porcupine	Open tundra and deciduous forests. In habitats that lack ground cover, they can be found in trees, preferring those with thick foliage for sight protection such as Douglas fir and hemlock.	Low Suitability	None	G5 S3 SSC

Gulo gulo	California wolverine	Alpine, tundra, taiga, and boreal forest zones, including coniferous, mixed and deciduous woodlands, bogs, and open mountain, as well as tundra habitats with dense spring snowpack.	Low Suitability	F-Proposed Threatened; S-Threatened	G4 S1 FP
Helminthoglypta talmadgei	Trinity shoulderband	Rocks or limestone talus, with proximity to a stream or spring and partial shading by a conifer forest.	Not Suitable	None	G2 S2 None
Lepus americanus klamathensis	Oregon snowshoe hare	Boreal forests and upper montane forests. Within these forests, they favor habitats with a dense shrub layer. They are found near mature conifers (mostly Douglas fir and variants), immature conifers, alder/salmonberry, Sitka spruce, and cedar swamps.	Low Suitability	None	G5T3T4Q S2 SSC
Martes caurina humboldtensis	Humboldt marten	Late-successional coastal redwood, Douglas fir, and mixed conifer forests with dense mature shrub layers and serpentine habitats with variable tree cover, dense shrub cover, and rock piles and outcrops. Elevations for Trinity County observations range from 3,000 to 6,400 feet (914-1,950 m).	Low Suitability	S-Candidate Endangered	G5T1 S1 SSC

Megomphix californicus	Natural Bridge megomphix	Well-shaded (riparian) slopes, as well as within the detritus found under bigleaf maples (*Acer macrophyllum),* California hazelnuts (*Cornus cornuta),* and sword ferns (*Polysticum* spp.*).* It is more likely to be found on north-facing slopes.	Not Suitable	None	G1G2 S1S2 None
Monadenia infumata setosa	Trinity bristle snail	Riparian corridors and uplands and Klamath/Trinity mixed-conifer forests that have a deciduous hardwood understory. This species is primarily found in moist but well-drained, well-shaded canyons or on streamside benches covered with a layer of leaf mold that is at least 4-inches-deep.	Not Suitable	S-Threatened	G2T2 S2 None
Myotis evotis	long-eared myotis	Will use many features for roosts including mines, caves, rock crevices, and buildings. In forests, commonly uses tree roosts. In Trinity County, black oak roosting sites were found. Forages close to roosts. Colony size ranges from 30 to 50.	High Suitability	None	G5 S3 None
Taxidea taxus	American badger	Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils. Commonly associated with treeless regions, prairies, park lands, and cold desert areas.	Low Suitability	None	G5 S3 None
Pandion haliaetus	osprey	Salt marshes, rivers, ponds, reservoirs, estuaries, and coral reefs.	Low Suitability	None	G5 S4 WL

Pekania pennanti	fisher - West Coast DPS	Key habitat components include relatively large diameter trees, high canopy closure, large trees (hardwood and conifer) with cavities, and large downed wood.	Low Suitability	S-Candidate Threatened	G5T2T3Q S2S3 SSC
Rana boylii	foothill yellow-legged frog	Partially shaded, rocky perennial streams. Adult frogs move throughout stream networks from winter refugia to mating habitats where eggs are laid in spring and tadpoles rear in summer. They breed in streams with riffles containing cobble-sized or larger rocks as substrate.	Not Suitable	S-Candidate Threatened	G3 S3 SSC
Vespericola pressleyi	Big Bar hesperian	Beneath decaying hardwood leaves, in woody debris, and on loose rocks near active streams. It is active on damp moss and fallen bigleaf maple leaves around perennial spring seeps that are shaded by a dense canopy of red alder and bigleaf maple. It can also be associated with springs in relatively open stands of Douglas fir.	Not Suitable	None	G1 S1 None

During the field surveys, the vegetation communities were defined using the alliances from A Manual of California Vegetation, 2nd Edition. The botanical survey areas were defined using interpretation of aerial imagery and field reconnaissance. The Releve survey method sample size was used for herb, shrub, and forested lands. The biological data was collected by performing a visual encounter survey. Herbarium specimens were not collected during the initial study due to the urgent nature of the reports. The study was conducted by Keiki Yamasaki and Marie Petersen on April 4, May 14th, and July 18th of 2019. Approximately 14 hours were spent in the field by the biologists.

Results

The most prevalent vegetation type throughout the property and project area is a state threatened (S3) Oregon white oak (*Quercus garryana*) alliance. A diverse geophyte community grows underneath the sparse canopy of Oregon white oak and grey pine. Sparse ceanothus and manzanita shrubs provide nesting habitat, as well as foraging opportunities and protection from predators, to a diverse avian community.

Figure 18: Old Oregon White Oak with 2° Cavity

The area around the ponds is dominated by annual European grasses and yellow star-thistle. There is little to no overstory canopy in these areas and prolific ground squirrel burrows are found throughout this area. Abundant prey species, coupled with a water source, draw in larger predatory birds such as herons. The ponds are heavily used by amphibians and aquatic mollusks. An abundant population of *Nostoc* spp. balls was found in late summer.

Figure 19: Non-Native Grasses with Rodent Burrows

Figure 20: Nostoc spp.Colonies

Table 4: Vegetation Alliances Found on the Property

Subproject Name	**Vegetation Alliance**	**CNDDB Rank**	**Acres Observed**
Commercial Cannabis Expansion	*Quercus garryana* (Oregon white oak) Woodland Alliance	G4 S3	5.4
Commercial Cannabis Existing Garden	Ruderal/No Dominant Life Form	Not Rare	0.8
Water Source	*Bromus diandrus* (ripgut brome) Semi-Natural Herbaceous Stand	Not Rare	0.85
Undeveloped Upland Area	*Poa pratensis (*Kentucky bluegrass*)* Semi-Natural Herbaceous Stands	Not Rare	1.5
Future Rainwater Catchment Pond Area	*Ceanothus cuneatus (*wedgeleaf ceanothus*)* Shrubland Alliance	G4 S4	0.9
Total			9.5 Acres

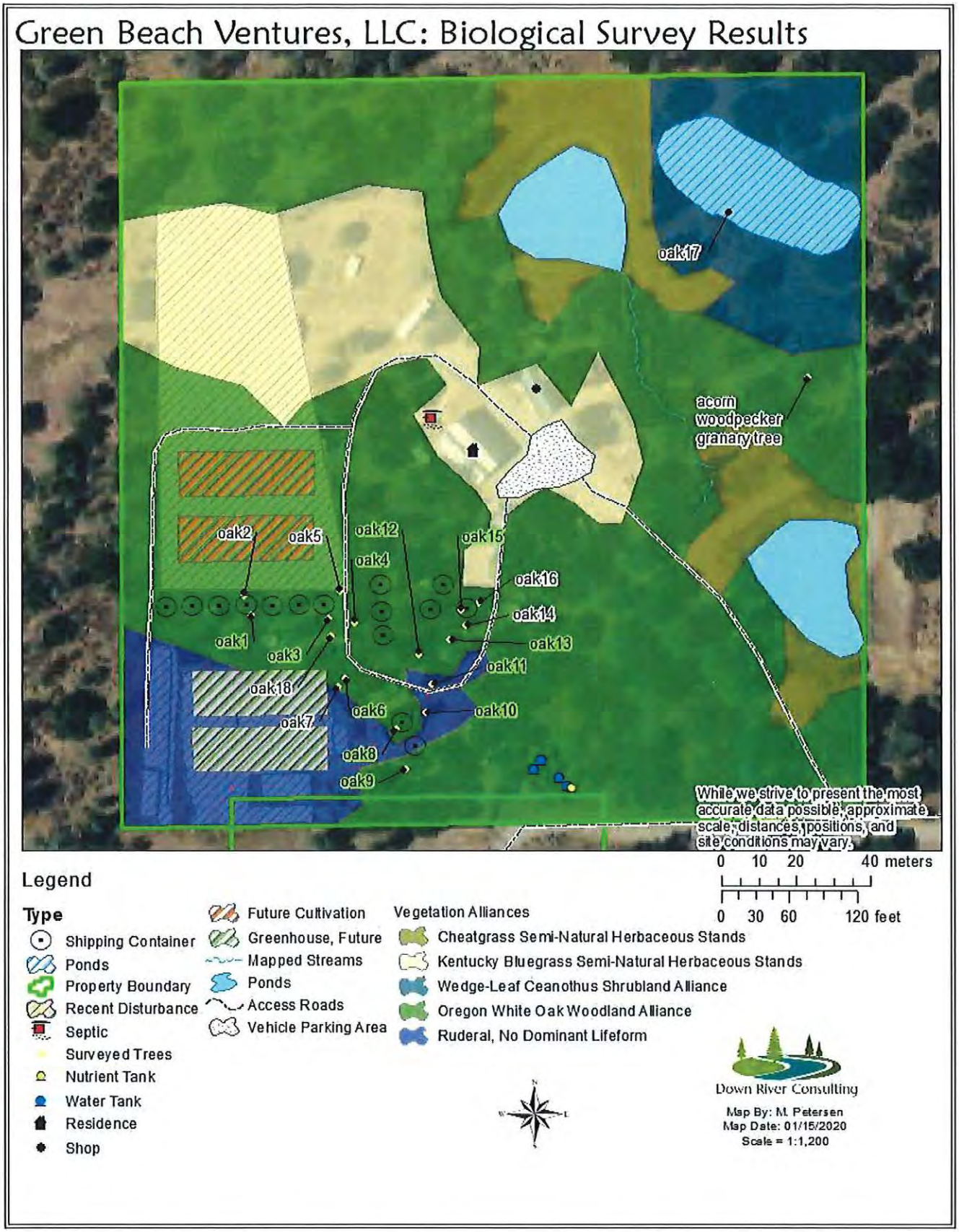


Figure 21: Green Beach Ventures LLC Vegetation Map

Plants

Vascular Plants

Due to the fact that there are no rock outcrops or ultramafic soils in the project vicinity, it does not provide suitable habitat for the following species: Dudley's rush *(Juncus dudleyi),* Nile's harmonia (*Harmonia doris-nilesiae*), Stebbins' harmonia (*Harmonia stebbinsii*), serpentine rockcress (*Boechera serpenticola*), Shasta chaenactis (*Chaenactis suffrutescens*), pale yellow stonecrop (*Sedum laxum sp. flavidum*), and Canyon Creek stonecrop (*Sedum obtusatum* sp. *paradisum*). They will not be discussed further in this report.

Coast fawn lily (*Erythronium revolutum)* is a perennial bulbiferous herb in the Liliaceae family. It is listed as G4 S2S3 2B.2. The bloom period is from March to July. The typical habitat for this species is streambanks, wet places, bogs, fens, broad-leafed upland forest, and North Coast coniferous forest. Its bioregional distribution includes the North Coast, Klamath Ranges, and North Coast Ranges. It is found at elevations up to 5,250 feet (1,600 m). While some habitat elements were present on-site, water does not persist in these soils long enough to support this species. During the study, this organism was not found within the study area.

Oregon fire herb (*Epilobium oreganum)* is a perennial herb in the Onagraceae family. It is listed as G2 S2 1B.2. The bloom period is from June to September. The typical habitat for this species is (serpentine) mesic bogs and fens, lower montane coniferous forests, upper montane coniferous forests, meadows, and seeps. This plant is also found in the Klamath Ranges. It is found at elevations generally between 1,640 and 7,349 feet (500-2,240 m). While some habitat elements were found in the project vicinity, ultramafic soils do not exist on-site and water does not persist in the soil long enough to provide high quality habitat for this species. During the study, Oregon fire herb was not found within the study area.

Tracy's eriastrum (*Eriastrum tracyi*) is an annual herb in the Polemoniaceae family. It is listed as G3Q S3 3.2. The bloom period is from May to August. The typical habitat for this species is (disturbed) open areas on shale or alluvium, chaparral, cismontane woodland, valley, and foothill grasslands. Its California floristic provinces include the Klamath Ranges, the Inner North Coast Ranges, the South Sierra Nevada Foothills, the San Francisco Bay Area, the Warner Mountains, and the Modoc Plateau. It is found at elevations between 1,312 and 3,281 feet (400-1,000 m). Disturbed roadside habitat was observed in the project area. During the study, this organism was not found within the study area.

Woolly meadowfoam (*Limnanthes floccosa* sp. *floccosa*) is an annual herb in the Limnanthaceae family. It is listed as G4T4 S3 4.2. The bloom period is from March to May. The typical habitat for this species is vernally mesic, chaparral, cismontane woodland, valley and foothill grassland, and vernal pools. Its bioregional distribution includes the Klamath Ranges and Inner North Coast Ranges. It is found at elevations generally below 1,965 feet (595 m). This habitat type was observed in the project area. During the study, woolly meadowfoam was not found within the study area.

Animals

Invertebrates

Insects

The project site does not provide suitable habitat for the following species: Leech's chaetarthrian water scavenger beetle (*Chaetarthria leechi*) and Wawona riffle beetle (*Atractelmis wawona*). They will not be discussed further in this report.

Mollusks

Terrestrial mollusks thrive in conditions that allow for 4 or more inches of leaf mold in moist substrates, often near perennial streams with high canopy cover and late seral stage stands. The species found in Trinity County are often associated with limestone substrate. The project site does not provide suitable habitat for the following species: Big Bar hesperian (*Vespericola pressleyi*), Hooded lancetooth (*Ancotrema voyanum*), Natural Bridge megomphix (*Megomphix californicus*), and Trinity shoulderband (*Helminthoglypta talmadgei*). They will not be discussed further in this report.

Trinity bristle snail (*Monadenia infumata*) is an air-breathing terrestrial snail in the Helminthoglyptidae family. It is listed as G2T2 S2. The typical habitat for this species is riparian corridors and uplands and the Klamath/Trinity mixed-conifer forests with a deciduous, hardwood understory. This species is primarily found in moist but well-drained, well-shaded canyons or streamside benches covered with a layer of leaf mold that is at least 4-inches-deep. The project sites are open, lack tree cover, and do not provide typical habitat; however, sometimes this species is observed in dry sites not considered to be their typical habitat. Although this study took place during the months of April and May, when terrestrial mollusks are generally active, Trinity bristle snail was not found on-site (Bureau of Land Management, 2009).

Fish

Results from the UC Davis PISCES search for the Carr Creek HUC12 Watershed included the following six fish species: Klamath Smallscale Sucker (*Catostomus rimiculus*), Klamath River Lamprey (*Entosphenus similis*), Coastal Rainbow Trout (*Oncorhynchus mykiss irideus*), Klamath Mountains Province Winter Steelhead (*Oncorhynchus mykiss*), Upper Klamath-Trinity Fall Chinook Salmon (*Oncorhynchus tshawytscha*), and Upper Klamath-Trinity Spring Chinook Salmon (*Oncorhynchus tshawytscha*). Fin fish-bearing streams were not present in the project area. Furthermore, the ponds did not have any resident fin fish in them. Fin fish will not be discussed further in this report.

Reptiles & Amphibians

The ponds provide ideal nursery habitat for Pacific tree frogs (*Pseudacris regilla*) and California toads (*Anaxyrus boreas halophilus).* Both species were observed in the upper (northern) pond on the property. In the

spring, tree frog and toad tadpoles were abundant, and by summer time, there were hundreds of sub-adult tree frogs and toads along the edges of the pond. The ponds provide ideal habitat for turtles; however, no western pond turtles (*Emys marmorata)* were observed on the property.

Figure 22: Tree Frog

Figure 23: Upstream Pond

Figure 24: Deformed Frog

Due to the lack of perennial streams with rocky substrate, the project site does not provide suitable habitat for the following species: Foothill yellow-legged frog (*Rana boylii*) and Pacific tailed frog (*Ascaphus truei)* These species will not be discussed further in this report.

Western Pond Turtle (*Emys marmorata*) is an aquatic turtle in the Emydidae family. It is listed as G3G4 S3. The typical habitat for this species is ponds, lakes, rivers, streams, creeks, marshes, and irrigation ditches with abundant vegetation, and either rocky or muddy bottoms, in woodlands, forests, and grasslands. In streams, it prefers pools to shallower areas. Logs, rocks, cattail mats, and exposed banks are required for basking. It may enter brackish water and seawater. This habitat type was observed on the property; however, during the study, no western pond turtles were observed (Nafis, 2000-2018).

Mammals

The only mammal observed on the property was the California ground squirrel (*Otospermophilus beecheyi).* They were, however, quite abundant and their burrows were found throughout the entire property. Ground squirrel management options are described in the Discussion section of this report.

Suitable habitat for the following species of mammals were not found on-site: American badger (*Taxidea taxus*), California wolverine (*Gulo gulo*), North American porcupine (*Erethizon dorsatum*), Oregon snowshoe hare (*Lepus americanus klamathensis*) and Humboldt marten (*Martes caurina humboldtensis*). They will not be discussed further in this document.

Fisher West Coast DPS (*Pekania pennanti*) is an omnivorous mammal in the Mustelidae family. It is listed as G5 T2T3Q S2S3. The typical habitat for this species is coniferous forests, but it is also found in mixed and deciduous forests with a high canopy closure and many hollow trees for dens. Tree species typically found in fisher habitat are spruce, fir, white cedar, and some hardwoods. This habitat type was observed in the project area. Fishers have been historically observed in the study area. Current presence of fisher for the project area is assumed (Meyer, 2018).

Bats

The nine quad CNNDB search for sensitive species lists two bat species. These species were not directly observed during site visits, but the property owner has observed a variety of unidentified bat species flying around the property at dusk. Due to the prevalence of nesting and foraging habitat in the project vicinity, presence of all sensitive bats listed below should be assumed.

Long-Eared Myotis (*Myotis evotis*) is a vesper bat in the Vespertilionidae family. It is listed as G5 S3. The typical roosting habitat for this species includes crevices, snags, spaces under bark, and buildings. Night roosting usually occurs in caves. Its foraging habitat is over water, in open spaces, and among trees (Zeiner, Laudenslayer Jr., Mayer, & White, 1988-1990). The long-eared myotis is another low flying bat that is averse to artificial lighting at night. This species is sensitive to construction activities because it roosts in rocky crevices and abandoned buildings which tend to be sites for building construction. This habitat was observed on the property and in the surrounding area (Nor Cal Bats, 2017).

Townsend's Big-Eared Bat (*Corynorhinus townsendii*) is a mammal in the Vespertilionidae family. It is listed as G3G4 S2. The typical habitat for this species includes coniferous forests, mixed mesophytic forests, deserts, native prairies, riparian communities, active agricultural areas, and coastal habitat types. Its distribution is strongly correlated with the availability of caves and cave-like roosting habitat, with population centers occurring in areas dominated by exposed, cavity-forming rock and/or historic mining districts. They roost in abandoned buildings, under tree bark, and in rock crevices (National Park Service, 2018). They only forage during complete darkness, so reducing nocturnal artificial lighting is important to the presence of this species. Foraging habitat was observed on the property and in the surrounding area (Townsend's Long-Eared Bat, 2017).

Birds

Bird species observed in the project area were mourning doves (*Zenaida macroura*), acorn woodpeckers (*Melanerpes formicivorus*), Steller's jays (*Cyanocitta stelleri*), American robins (*Turdus migratorius*), ravens (*Corvus corax*), turkey vultures (*Cathartes aura*), common starlings (*Sturnus vulgaris*), a green-backed heron (*Butorides virescens*), and a killdeer (*Charadrius vociferus*).

Acorn woodpeckers were observed on-site as well as a granary tree. Granary trees are an important survival resource for populations of the acorn woodpecker and usually occur at a rate of only 2.1 granary trees/6 ha home range (CalPIF, 2002). Retention of a suitable supply of acorns around the granary tree is recommended. Personal observations of other granary trees in the Hayfork area indicate that the acorn woodpecker will continue to use a granary tree in anthropogenically developed areas with an amply acorn supply.

The female killdeer exhibited distressed behavior adjacent to one of the ponds. She flopped around and vocalized to try to draw attention and potential predators away from a nest. The killdeer nest location was not detected during the survey; however, it is suspected to be on the ground near the pond.

Figure 25: Acorn Woodpecker Granary Tree

Figure 26: Oregon White Oak Cavity

Northern Spotted Owl (*Strix occidentalis caurina*)

Owl TRI0342 occupies a nest 0.75 miles from the project area; however, suitable northern spotted owl habitat is not found on-site. Furthermore, recent hooting data documents owl TRI0342 avoiding the non-suitable areas to the north and using the areas shown on the map as nesting and roosting habitat. This project will not contribute to the decline of the northern spotted owl.

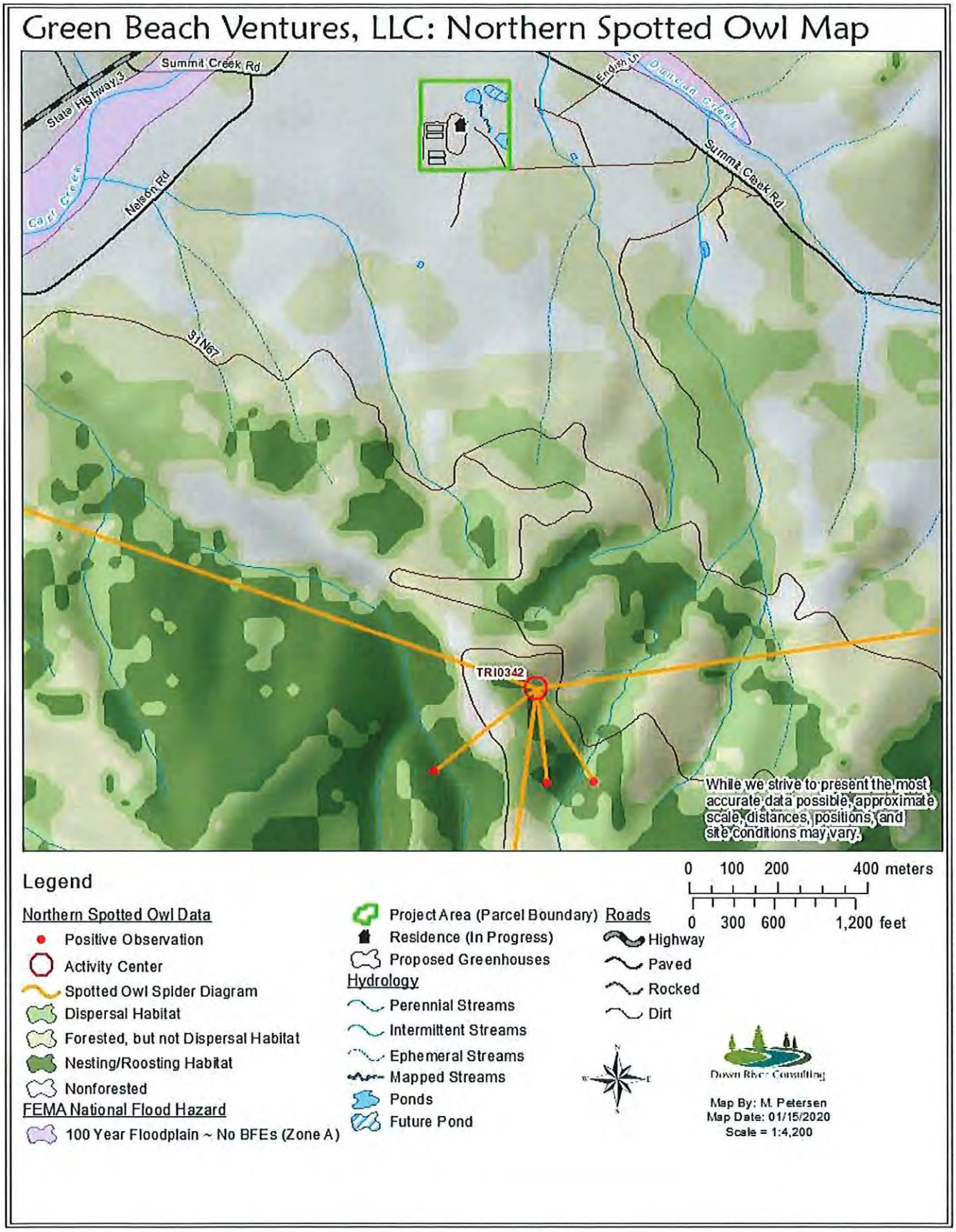


Figure 27: Northern Spotted Owl Habitat Map

Other Birds

Due to the lack of fin fish-bearing streams and waterbodies, the project site does not provide suitable habitat for the following species: Osprey (*Pandion haliaetus*). This species will not be discussed further in this report.

Golden Eagle (*Aquila chrysaetos*) is a large raptor in the Accipitridae family. It is listed as G5 S3. The typical habitat for this species is partially or completely open country, especially around mountains, hills, and cliffs in habitat types such as tundra, shrublands, grasslands, coniferous forests, farmlands, and areas along rivers and streams. Suitable habitat was observed on the property; however, golden eagles were not observed during the surveys.

Avoidance and Mitigation Measures

1. There is yellow star-thistle present in the open areas adjacent to the ponds. Many other noxious weed species are present in the cultivation area. Please refer to Appendix A for a complete list of plants found in the project areas. Proliferation of untreated noxious weeds causes wildlife habitat degradation and has been found to result in enormous agricultural losses. These impacts are considered significant (FAC Article 1.7, 7270).
    a. Mitigation Bio-1: Any heavy equipment used to develop the property should be thoroughly washed and inspected for weeds before arrival, in order to prevent the introduction of new weed species.
    b. Mitigation Bio-2: Monthly monitoring and treatment of yellow star-thistle in the expansion area should be conducted throughout the growing season, together with rapid (treatment) response for new weed populations and modification of an integrated pest management plan, which addresses the biological considerations of the target species.

2. Site development may result in a net loss of 40,000 ft^2 of moderately degraded oak woodland habitat. Loss of Oregon white oak (*Quercus garryana*) woodlands (S3) would be considered significant.
    a. Mitigation Bio-3: Two Oregon white oak seedlings shall be planted within the riparian setback around the ponds, for every one oak tree that is cut during project development. Seedlings shall be watered once monthly from May through October, for the first three years after planting. Vitality of said plantings shall be monitored once annually. Replanting will occur if the viable population of seedlings drops below 85%.

3. Conversion and construction activities may cause destruction of nests or abandonment of young. Harm to bird nests or eggs would be considered a significant impact.
    a. Mitigation Bio-4: Nest and den surveys shall be completed within seven (7) days prior to construction or disturbance, by a qualified biologist, as defined in §722.3.A of the California Code of Regulations, if the activities occur between February 1st and August 31st. In the event that a nest or den is detected, a protective buffer shall be established by the biologist to avoid deleterious impacts to the animal or offspring, such as nest abandonment.

4. The Townsend's big eared bat and long-eared myotis are low flying bats that are significantly impacted by artificial lighting at night. They only forage during complete darkness. Disruption of foraging

activities could result in a take of the CESA-protected Townsend's big eared bat, and would be considered a significant impact.

a. Mitigation Bio-5: The farm manager shall shield all greenhouse lights and install only downcast red LED exterior lighting to mitigate the lighting impacts. Bat-friendly lighting would result in less than significant lighting impacts (Coxworth, 2018).

5. Fisher dens have been documented in close proximity to this project. Fishers and birds of prey likely hunt the abundant prey populations available on this property. Fisher mortality has been associated with anticoagulant rodenticides in the Klamath Ranges and the North Coast of California. Any impact that would result in a loss of viability of the previously mentioned predator populations would be considered significant.
   a. Mitigation Bio-6: In order to mitigate for unintended harm to fishers, the farm shall use preventative and non-chemical strategies to control rodents. The rodent prevention strategy will focus on reducing the rodent carrying capacity of the site by removing food access and items/features that could provide habitat to rodents. The farm manager will erect owl boxes if needed. In the event that an infestation is detected, traps and EradiBait, a non-anti-coagulant powder corn cob, will be used to extirpate the pests. The use of this pest management strategy, rather than anticoagulant rodenticides, reduces the rodent management impacts to less than significant.

Discussion

Bullfrog Prevention

There are currently no bullfrogs present in the ponds on the property; however, the ponds provide ideal habitat for bullfrogs, and monitoring should be implemented. Early detection and rapid response are necessary when combating invasive species. Seasonal pond draining coupled with trapping of adults seems to be the most effective way to disrupt the bullfrog life cycle. (Doubledee et al., 2007)

Water Quality Issues

Recently, a deformed Pacific tree frog (*Pseudacris regilla*) with an extra hind leg was observed in the upper pond. The photo (Figure 24: Deformed Frog) was forwarded to CDFW staff who specialize in amphibians. The conclusion was that the deformity was caused by the parasitic flatworm (*Ribeiroria spp.)* that scrambles leg bud cells during metamorphosis.

It has been hypothesized that artificial habitats with high productivity, such as farm ponds, create ideal habitat for *Ribeiroria* for three reasons: 1) The fertilizer runoff can cause increased algae growth and increases in snail (*Ribeiroria*'s first host) populations, 2) there has been an increase in the creation of man-made impoundments in the last 60 years, and 3) *Ribeiroria*'s second and third necessary hosts (amphibians and birds) are commonly associated with pond habitats (Johnson, 2003).

Water quality would improve with a reduction in the fertilizer (N-P-K) inputs to the ponds. This will be difficult for this property, because the ponds are fed by a Class III stream that flows from properties that are upstream. Vegetated buffer strips (4 to 10-feet-wide) of native grass would help to minimize some of the fertilizer inputs (Penn State Extension, 2019).

Appendix A

Table 5: Oak Woodland Species

Family	Scientific Name	Common Name	Status (Blank = Native & Not Rare)
Asteraceae	*Anaphalis margaritaceae*	pearly everlasting	
Asteraceae	*Leontodon saxitillis sp. saxitillis*	hawkbit	
Caryophyllaceae	*Silene boulanderi*	Boulander's silene	
Fagaceae	*Quercus garryana*	Oregon white oak	
Iridaceae	*Iris macrosiphon*	ground iris	
Liliaceae	*Calochortus tolmiei*	hairy star tulip	
Poeaceae	*Dactylis glomerata*	orchard grass	CalIPC Rating Invasive-Limited
Poeaceae	*Festuca microstachys*	small fescue	
Primulaceae	*Primula hendersonii*	Western shooting star	
Ranunculaceae	*Delphinium decoratum sp tracyi*	Tracy's larkspur	
Rhamnaceae	*Ceanothus cuneatus*	buckbrush	
Rubiaceae	*Galium parisiense*	wall bedstraw	

Table 6: Existing Cultivation Area

Family	Scientific Name	Common Name	Status (Blank = Native & Not Rare)
Asteraceae	*Ceantauria solstitialis*	yellow star-thistle	CalIPC Rating Invasive-High
Asteraceae	*Madia elegans*	common madia	
Brassicaceae	*Brassica nigera*	black mustard	CalIPC Rating Invasive-Moderate
Chenepodiaceae	*Chenopodium album*	white goosefoot	Non-native
Convulvulaceae	*Calystegia malacophylla*	morning glory	
Fagaceae	*Quercus garryana*	Oregon white oak	
Poeaceae	*Festuca idahoensis*	blue bunchgrass	
Poeaceae	*Poa pratensis*	Kentucky bluegrass	CalIPC Rating Invasive-Limited

Table 7: Species Near Ponds

Family	Scientific Name	Common Name	Status (Blank = Native & Not Rare)
Asteraceae	*Centaurea solstitialis*	yellow star-thistle	CalIPC Rating Invasive-High
Polygonaceae	*Rumex crispus*	curly dock	CalIPC Rating Invasive-Limited
Geraniaceae	*Erodium circutarium*	red stemmed filaree	CalIPC Rating Invasive-Limited
Poeaceae	*Hordeum murinum sp. glaucum*	foxtail grass	Non-native
Poeaceae	*Bromus diandrus*	ripgut brome	CalIPC Rating Invasive-Moderate
Pinaceae	*Pinus Ponderosa*	ponderosa pine	

Appendix B

Table 8: Animal Species Present On-Site

Scientific Name	Common Name	Location
Zenaida macroura	mourning dove	in oak trees
Melanerpes formicivorus	acorn woodpecker	in oak trees
Cyanocitta stelleri	Steller's jay	in oak trees
Turdus migratorius	American robin	edge of pond
Corvus corax	raven	in flight
Cathartes aura	turkey vulture	soaring
Pseudacris regilla	Pacific tree frog	pond
Anaxyrus boreas halophilus	California toad	pond
Butorides virescens	green-backed heron	pond
Otospermophilus beecheyi	California ground squirrel	throughout property
Sturnus vulgaris	common starling	in oak trees
Charadrius vociferus	killdeer	driveway

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1. CNDDB Updated Records

The table below summarizes the changes to the CNDDB spatial data since the initial biological assessment was completed, for this project. There are two new species found in the nine-quad area.

Jepson's dodder (*Cuscuta jepsonii*) is a parasitic plant in the Convolvulaceae family. It's known host plants are pinemat manzanita (*Ceanothus diversifolius*) and mahala mats (*Ceanothus prostrates*). Neither of these species were found on this site. In addition, all species of dodder are very conspicuous and were not observed during field surveys of this site. The Cuscuta genus is currently under taxonomic and genetic review. I am participating in the hunt for and collection of genetic samples, from any populations of dodder that are found, as well as host plants. Based on the current available habitat and host plant knowledge as well as physical surveys, there will not be any impacts to Jepson's dodder as a result of this project.

The Trinity County amphipod (*Stygobromus trinus*) is a stygobiont in the Crangonyctidae family. This animal occurs in groundwater aquifers and lives out its whole life in subterranean environment. Typical habitat elements include caves, fissures, and springs, as well as limestone and alluvium substrates. These habitat elements are not present in the project area. Furthermore, the water source for this project is captured rainwater and surface flows from a Class III stream. Based on the current available species habitat data the project will not have a significant impact on the Trinity County amphipod.

Scientific Name	Common Name	Habitat Suitability	Change	Project Impacts
Cuscuta jepsonii	Jepson's Dodder	Not Suitable	Added to CNDDB; **G3 S3 1B.2**	None due to absence of known host plants
Myotis evotis	Long-eared Myotis	High Suitability	Removed from CNDDB	N/A no longer included for consideration
Pekania pennanti	Fisher	Low Suitability	Former State-Candidate for Listing; Now not listed State or Federally	No effect
Rana boylii	Foothill yellow-legged frog	Not Suitable	Former State Candidate Threatened; Now State Endangered	Suitable habitat does not occur in the project area, no impact
Stygobromus trinus	Trinity County amphipod	Not Suitable	Occurrence added to CNDDB records; Ranking G1 S1	No impact: Surface water will be used as the water source; these animals occur in groundwater.
Taxidea taxus	American badger	Low Suitability	Record removed from CNDDB	N/A no longer included for consideration

Table 1: Summary of Changes to Species Under Consideration Between 2018 and 2020

2. <u>Oak Tree removal mitigation monitoring criteria:</u>
   Vigor monitoring of the planted oaks shall occur once annually, for a period of 5 years. Data collected for each plant will include: date, height, and vigor (good, moderate, poor, or dead). Replacement plantings will occur annually if the planting survival rate falls below 85% of the total original planting numbers.
3. <u>Northern Spotted Owl Hooting Data:</u>
   The recent Northern Spotted Owl hooting data cited is referring to the combination of CNDDB NSO spatial data as well as USDA Forest Service hooting survey spatial data as referenced in the Biological report methodology. I combined the two spatial datasets into one feature class to create a more complete nest core layer, for the Landscape Assessment project that was completed at the request of the Trinity Collaborative Group. Over the years I have continued to update this combined layer as new Forest Service and CNDDB data becomes available.
4. <u>Preparers Qualifications:</u>
   A short summary biography, as well as a resume can be found in Attachment 1.

Figure 1. Property Diagram

1.) 36" CMP (overflow from pond)
2.) 36" CMP (overflow from pond)
3.) 24" CMP runs under Frog Pond Ln
4.) Proposed Rain Catchment Pond
5.) Pond (15,866sq ft)
6.) Pond (14,674sq ft)
7.) Frog Pond Lane
8.) Class III Watercourse
9.) Access Road
10.) 500G (domestic), 3,000G and 2,500G (agriculture) Water Storage Tanks; Two Proposed 5,000G Water Storage Tanks
11.) Surface Water Diversion (agriculture and domestic)

Parcel Boundary

Premises Boundary

Parcel Entrance/Exit

Premises Entrance/Exit

Light-Blue-Dashed Line Indicates Water Transport from Well to Water Tank to Cultivation

APN:
017-010-80-00

Remaining Portion of Parcel is Unused

Figure 2. Project Diagram

1.) Proposed 35' x 100' Commercial Nursery
2.) Proposed 35' x 100' Greenhouse - Immature Canopy
3.) Four 24' x 100' Greenhouses - Mature Canopy
4.) 15' x 50' Cannabis Waste Area - Compost
5.) Proposed 10' x 12' Building - Ag. Chemical / Pesticide Storage
6.) Proposed 10' x 12' Building - Admin Hold Area

Parcel Boundary

Premises Boundary

APN:
017-010-80-00

Remaining Portion of Parcel is Unused

Lettered-White-Rectangles are metal shipping containers
A: 10' x 40' = Research & Development
B: 10' x 40' = Drying/Processing
C: 10' x 40' = Drying/Processing
D: 10' x 40' = Processing
E: 10' x 40' = Processing
F: 10' x 40' = Manufacturing/Kitchen
G: 10' x 20' = Manufacturing/Extraction
H: 10' x 20' = Harvest Storage
I: 10' x 40' = Distribution
J: 10' x 20' = Non-Storefront Retail

No Shared Areas Between Licenses

Mature Canopy Area:

(24' x 100')(4)

Total = 9,600 sq. ft.

Immature Canopy Area:

35' x 100'

Total = 3,500 sq. ft.

Marie Petersen is an Environmental Permitting Specialist and owner of Down River Solutions, LLC. She also serves as the Botany Program Manager at the Watershed Research and Training Center. She received a B.S. in Rangeland Resource Science: Wildland Soils from Humboldt State University. After college, she studied under Rosemary Gladstar and Jane Bothwell, earning two Herbal Therapeutic Certificates. Since 2011, she has worked as part of an interdisciplinary inter-agency team, focused on restoring the South Fork of the Trinity River. In 2016, her commitment to restoration, and to a sustainable Trinity County economy, led her to expand her stewardship role and she began working on *Cannabis* permitting projects. Marie currently holds a contract with the Shasta-Trinity National Forest, for botanical surveys, and is gearing up to survey numerous timber sale projects during the 2021 field season. Her long-standing local and regional partnerships are an integral component of the restorative land management strategies she assists her clients and partners with. She is proud to help *Cannabis* farmers work toward environmental compliance and success.

Marie Petersen

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Weaverville CA 96093
Email: stellaria.sftr@gmail.com
Cell Phone: (530) 999-8501

JOB OBJECTIVE

My objective is to continue to use my diverse skillset to conserve and restore natural resources, within Trinity County; while working as part of an interdisciplinary team to increase the capacity for implementation of restorative land management strategies.

CAREER EXPERIENCE

Environmental Permitting Specialist April 2020-Present

Down River Solutions, Hayfork CA

Violation mitigation, turbidity monitoring, revegetation, soil and water conservation, botanical surveys, biological assessments, wetland delineation, cartography, CEQA compliance, and general cannabis farm permitting.

Director of Environmental Services July 2016-February 2020

Down River Consulting, Weaverville CA

Direct environmental compliance program, GIS program management, agricultural surveys, resource protection planning, water quality restoration, monitoring, mitigation, revegetation, soil and water conservation, botanical surveys, wetland delineation, & CEQA Compliance.

Field Scientist/GIS Specialist May 2011-November 2016

The Watershed Research and Training Center, Hayfork CA

Plant biologist, Noxious Weeds Program Coordinator, GIS analysis, cartography, data genesis and management, wilderness work, prescribed burning, wildland firefighting, revegetation, rare plant surveys, NRIS entry, timber sale layout, & educational guest lecturer

CAREER TRAINING

GIS for Cannabis Compliance; December 2019; UC Davis Extension

Thresholds of Significance in Environmental Planning, April 2019; UC Davis Extension

How Managers Become Great Leaders, February 2019; Fred Pryor Seminars

Successful CEQA Compliance: An Intensive Two-Day Seminar, February 2019; UC Davis Extension

How to Write Great CEQA Documents May 2018; UC Davis Extension

Wetland Delineation Training, January 2018; Richard Chinn Environmental Training

Wetland Regulation and Mitigation July 2017; UC Davis Extension

Sediment & Erosion Control Training (IECA), September 2016; International Erosion Control Association

Wildland Firefighter 2 Certification 2012-2016

Advanced GIS for Hydro Analysis 2013

Intermediate GIS for Hydro Analysis 2012

EDUCATION

BS degree: **Rangeland Resource Management: Wildland Soil Science**
Humboldt State University, Arcata CA.
Graduation Date: May 2009; Degree Date 2020
3.18 (Overall) G.P.A.

A.A. degree **Transfer Studies**
College of the Redwoods, Eureka CA.
Graduated August 2005
3.24 G.P.A.

AFFILIATIONS

Interdisciplinary Cannabis Advisory Board, Humboldt State University 2020
California Native Plant Society 2015-Present
International Erosion Control Association 2016-Present
Society of Leadership & Success 2007-Present

REFERENCES

Kate Blanchard	California Department of Fish and Wildlife
(530) 225-2239	katherine.blanchard@wildlife.ca.gov
Eric Keyes	Trinity Valley Consulting Engineers
(530) 739-0315	eric@tvce.biz
Josh Smith	The Watershed Research & Training Center
(530) 515-1364	josh@thewatershedcenter.com

Attachment C

Cultural Resources Investigation

Information contained in the Cultural Resources Investigation related to the specific location of prehistoric and historic sites is confidential and exempt from the Freedom of Information Act (FOIA) and the California Public Records Act (CPRA); therefore, site specific cultural resource investigations are not appended to this Initial Study. Professionally qualified individuals, as determined by the California Office of Historic Preservation, may contact the Trinity County Planning Department in order to inquire about its availability.