

September 28, 2022 - DRAFT



Initial Study & Mitigated Negative Declaration

for –

Sierra High Farms Cannabis Cultivation

Project Name	Sierra High Farms Cannabis Cultivation
Lead Agency Name and Address	Mono County Community Development Department PO Box 347 Mammoth Lakes, California 93546 760-924-1800
Contract Person and Phone Numbers	Michael Draper, Planning Analyst II 760-924-1805 mdraper@mono.ca.gov
Project Location	7712 Eastside Lane Topaz, California 96107 Mono County APN 001-150-004-000
Project Applicant / Operator	Jeff Hinds, Walter Hinds
Prepared By	Resource Concepts, Inc. Contact: Zach Wood & JoAnne Michael 775-883-1600
General Plan Land Use Designation	Agriculture (AG-10)

Environmental Factors Potentially Affected

This Initial Study has determined that in the absence of mitigation the proposed project could have the potential to result in significant impacts associated with the factors checked below. Mitigation measures are identified in this Initial Study that would reduce all potentially significant impacts to less than significant levels.

- | | | |
|---|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture/Forestry Resources | <input type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input type="checkbox"/> Geology/Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials |
| <input checked="" type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Population/Housings | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreations | <input type="checkbox"/> Transportations | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Wildfires | <input type="checkbox"/> Mandatory Findings of Significance |

On the basis of this initial evaluation:

- I find that the 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 project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the 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 project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier BIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier BIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Date

Title

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- Appendix A Figures
- Appendix B Biological Technical Report
- Appendix C Class III Archaeological Inventory

List of Acronyms

AG	Agriculture
AVFPD	Antelope Valley Fire Protection District
BLM	Bureau of Land Management
CEQA	California Environmental Quality Act
CNDDDB	California Natural Diversity Database
CO ₂ E	Carbon dioxide equivalent
CUPA	Certified Unified Program Agencies
CWA	Clean Water Act
CWPP	Community Wildfire Protection Plan
DCC	Department of Cannabis Control
EIC	California Historic Resource Information System Eastern Information Center
EIR	Environmental Impact Report
EOP	Emergency Operations Plan
ESA	Endangered Species Act
FHSZ	Fire Hazard Severity Zone
GBUAPCD	Great Basin Unified Air Pollution Control District
GHG	Greenhouse Gases
IPaC	US Fish and Wildlife Service Information for Planning and Consultation
LRWQCB	Lahontan Regional Water Quality Control Board
NAHC	Native American Heritage Commission
NDOW	Nevada Division of Wildlife
NOV	Notice of Violation
NPDES	National Pollution Discharge Elimination System
NVCRIS	Nevada Cultural Resource Information System
NWI	National Wetland Inventory
RTP	Regional Transportation Plan
SRA	State Responsibility Area
SWPPP	Storm Water Pollution Prevention Plan

Section 1. Introduction

1.1 Introduction

The Sierra High Farms cannabis microbusiness project (project) is requesting approval of a use permit under Mono County's Cannabis Operations ordinance (County Code 5.60) and to install overhead utility lines, consistent with the Mono County General Plan Land Use Element Section 1.L and Development Standards Chapter 13 – Commercial Cannabis Activities.

The purpose of this draft Initial Study and Mitigated Negative Declaration (Draft IS/MND) is for evaluation by Mono County of potential environmental effects resulting from the project. Section 2, "Project Description" includes detailed project information.

This document has been prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations [CCR] Section 15000 et seq.). Under CEQA, an IS can be prepared by a lead agency to determine whether a project may have a significant effect on the environment (CEQA Guidelines Section 15063[a]) and thus to determine whether an environmental impact report must be prepared. Mono County as lead agency has prepared the following analysis, which identifies the potential physical environmental impacts of the project and the mitigation measures that would reduce significant and potentially significant impacts to a less-than-significant level.

In accordance with the provisions of CEQA, Mono County is distributing a notice of intent (NOI) to adopt an MND to solicit comments on the analysis and mitigation measures presented in this Draft IS/MND. The NOI will be filed with the State Clearinghouse/Governor's Office of Planning and Research and each responsible and trustee agency. This Draft IS/MND will be available for review and comment from September 30, 2022 through October 31, 2022.

Written comments (including those submitted via e-mail) must be received by close of business on October 31, 2022. Letters should be addressed to:

Mono County Community Development Department
P.O. Box 347
Mammoth Lakes, California 93546
Attn: Michael Draper

E-mail comments should be addressed to: mdraper@monocounty.org.

Anyone with questions regarding the NOI or Draft IS/MND may call Michael Draper at 760-924-1805. Digital copies of the NOI and Draft IS/MND are available at <https://monocounty.ca.gov/community-development/page/cdd-public-hearing-ceqa-notices>. Hard copies of the NOI and Draft IS/MND are available for public review at the following location:

1290 Tavern Road.
Mammoth Lakes, California 93546

The following checklist is to be completed for all projects that are not exempt from environmental review under the CEQA. The information, analysis, and conclusions contained in the checklist are the basis for deciding whether an Environmental Impact Report (EIR) or Negative Declaration is to be prepared. Additionally, if an EIR is prepared, the checklist shall be used to focus the EIR on the effects determined to be potentially significant.

1.2 Lead, Responsible & Trustee Agencies

Lead Agency

- Mono County
 - Conditional Use Permit (cannabis activities and overhead power)
 - Cannabis Operation Permit
 - Building Permit
 - Grading Permit
 - Encroachment Permit
 - Septic and Well Permits
 - Hazardous material storage business plan

Responsible Agencies

- State of California Department of Cannabis Control:
 - Issuance of state cannabis microbusiness license
- State Water Resources Control Board:
 - General Construction Permit
- Lahontan Regional Water Quality Control Board:
 - Water Quality Certification
 - Great Basin Unified Air Pollution Control District (generator permits?)

Trustee Agencies

- California Department of Fish and Wildlife
- Office of Historic Preservation
- Native American Heritage Commission

Section 2. Project Description

2.1 Project Description

Sierra High Farms is proposing a ten-acre outdoor and 24,000 square-foot (SF) indoor commercial greenhouse cannabis cultivation operation (for year-round operation), with onsite cannabis processing (trimming, packaging, and labeling), and wholesale distribution. The applicant will also seek approval to conduct non-storefront retail sales, to conduct business at state-wide cannabis events. The operation will employ between 12-15 employees for indoor cultivation, and 4-8 seasonal employees for outdoor cultivation. The project is located within a 123-acre parcel (APN 001-150-004-000) that is owned by the project proponent. The General Plan land use designation of the parcel is Agriculture (AG) with a 10-acre parcel size minimum. The Location Map (Figure 1) and Site Plan (Figure 2) are provided in Appendix A.

A Mono County Use Permit and Operations Permit for cultivation will be submitted to conduct operations. Obtaining the required California state permits to cultivate cannabis will be conditions of both permits. The proposed project utilizes greenhouses and outdoor cultivation to grow cannabis. The proposed project facilities and ancillary items are described below.

The site was historically used for cattle ranching; however, new wire fences have been installed along parcel boundary and Highland Ditch to keep cattle off the project area. The site contains no structures. The construction of a septic system was initiated in the summer of 2022. There are three temporary water storage tanks that will remain on-site until the new well is operational.

2.1.1 Proposed Buildings and Ancillary Structures

The project proposes to construct an adult recreation/medical cannabis production facility that includes both indoor and outdoor cannabis cultivation. The project includes construction and operation of the following project components:

Indoor Cultivation

- Four 12,312 square-foot greenhouses (108' by 114') \ (up to 10,500 sq ft indoor mature plant canopy)
- One cultivation lab (4,200 sq ft, 60' by 70')
- One maintenance shop (2,400 sq ft, 40' by 60')
- Stormwater detention basin

Outdoor cultivation

- Ten acres of outdoor cannabis cultivation area including hoop house structures; cultivation area to be prepared by grubbing existing vegetation and grading for drainage; installation of drip irrigation systems connected to a new groundwater well
- One nursery and processing building (5,000 sq ft, 50' by 100')
- One drying shed building (2,100 sq ft, 35' by 60')
- Four storage containers of approximately 8' by 40' for outdoor cultivation tools and storage use

Supporting facilities and utilities

- One well pump building (169 sq ft, 13’ by 13’)
- One water tank building containing three 5,000-gallon tanks (700 sq ft, 17’ by 35’)
- One septic system (1,500 gallon holding tank, 190’ leach line)
- Two 70 kwh propane generators for primary power supply, backup (located within enclosure attached to an indoor cultivation building)
- Central propane tank (30,000 gallon)
- Access road improvements from project site to Eastside Lane. – addition of approximately five vehicle turnouts of 10’ by 75’
- Parking and loading areas
 - Indoor cultivation area – Parking for 12 vehicles
 - Nursery parking area- Parking for three vehicles
- Above ground electrical power service connection to Liberty Utilities (1.6 miles), including installation of approximately thirty (30) new 20’ height utility poles along East Side Lane and on the project property.

2.1.2 Project Phasing

The project is proposed to be implemented incrementally with the following phased improvements based on market conditions.

Table 2-1. Project Phasing

Phase 1
One (1) indoor cultivation building, maintenance shop, cultivation lab, access improvements, water tank, parking for indoor cultivation
Phase 2
Three (3) indoor cultivation buildings, central propane tank
Phase 3
Outdoor cultivation, drying shed, nursery, electrical service connection

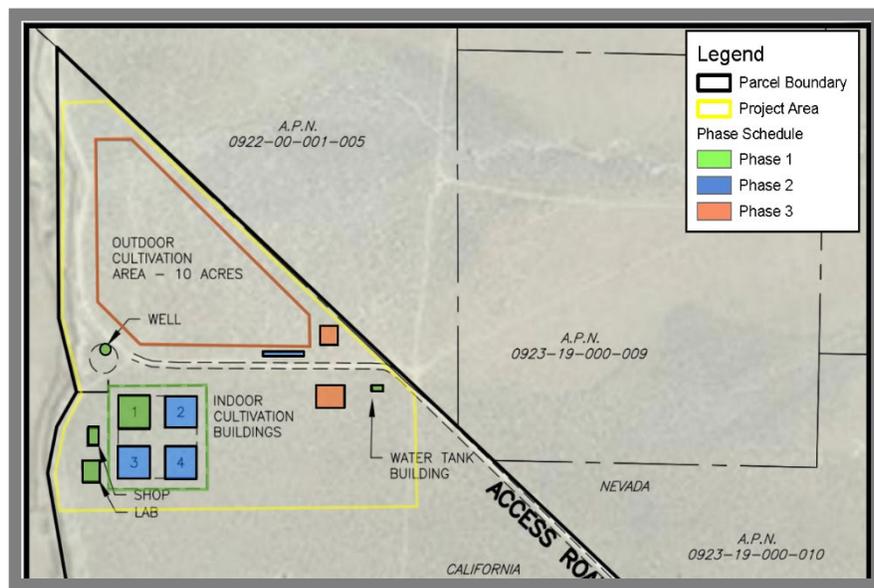


Figure 2-1. Project Phasing Plan

2.1.3 Construction

Project construction is anticipated to take place for approximately three years (two years for Phases 1 & 2, one year for Phase 3). The project may not be constructed continuously. Construction timing of successive Phases 2 and 3 would ultimately be determined by market conditions and implementation may occur over a longer period. Minor alterations involving no expansion of square footage or intensification of uses and exempt from CEQA may be approved by a Director Review Permit. Construction equipment would be variable based on activity and would include graders, backhoes, compactors, bulldozers, trenchers, water trucks, excavators, scrapers, tractors, forklifts generators, rollers, welders, and air compressors.

Table 2-2. Construction Phasing and Duration

Construction Phase	Duration
Site grading – Phases 1 & 2	60 days
Phase 1 – Indoor cultivation building #1, shop, and lab	6 months
Phase 2 – Three Indoor cultivation buildings, propane tank	12 months
Phase 3 – Outdoor cultivation, drying shed, nursery, electrical service connection	12 months

Initial construction of minor site improvements occurred in 2022, including the installation of a septic system and vegetation removal. Additional site work to prepare for building construction includes excavation for utility services and grading of a three (3) acre building pad for the indoor cultivation buildings. The building pad would require 13,000 cubic yards of grading, which will be balanced on-site and not require the import or export of additional material. At the completion of site grading, development of the first cannabis cultivation building would start. Indoor cultivation buildings and ancillary buildings are expected to be concrete slab and prefabricated metal buildings with grouted masonry walls. Installation of approximately 1.6 miles of above ground electricity and telecommunications would occur during Phase 3.

2.1.4 Unpermitted work and code enforcement activities

On March 24, 2022, Mono County Community Development Department issued a Notice of Violation (NOV) for work without a permit on the subject property. The work consisted of approximately 13 acres of land clearing and vegetation grubbing. The NOV required that the property owner obtain a grading permit for work performed and to stabilize the disturbed area to prevent dust generation and soil erosion. The compliance actions of the NOV were completed July 2022 and the project is no longer in violation. Due to the unauthorized work, the existing site conditions were changed; however, for the purposes of the environmental analysis the unpermitted activity does not create a significant change to the baseline environmental conditions. The project site was vegetated with upland brush prior to grading. Both the NOV and the project mitigation measures require re-seeding areas of disturbance.

Table 2-3. Timeline of site activity, environmental analysis, and code enforcement events.

Date	Activity\Action
June 2021	Land clearing, grubbing activities for approximately 13 acres
November 2021	Well permit (#26-21-19) issued; Well-constructed November 2021. Placement of water tanks
December 2021	CEQA environmental analysis began. Septic permit (#S21-39) issued December 2021
February 2022	Septic system constructed February 2022
March 2022	Cultural resources field work conducted by Great Basin Group
March 2022	Notice of Violation issued by Mono County Community Development
April 2022	Grading plan and permit application submitted to Mono County
July 2022	Abatement of NOV completed.

2.1.5 State and local regulation of cannabis uses

As a microbusiness the DCC allows multiple commercial cannabis activities under a single license. The proposed project activities are non-storefront retail, indoor cultivation, and distribution. Cannabis cultivation will occur all year for the indoor cultivation portion of the project and seasonally for the outdoor cultivation. The outdoor cultivation use requires a separate license as a Large Outdoor Cultivation of greater than one acre. Per DCC large cultivation permits shall not be issued until January 1, 2023.

Table 2-4. Required cannabis license by store type.

	Indoor cultivation up to 10,000 sq ft	Distribution	Non-storefront retail	Outdoor cultivation (greater than 1 acre)
Mono County Use permit	Use permit issued prior to County Operations Permit and DCC license			
Mono County Operations Permit	Operations permit issued after Use permit and prior to DCC license	Operations permit issued after Use permit and prior to DCC license	Operations permit issued after Use permit and prior to DCC license	Operations permit issued after Use permit and prior to DCC license
California Department of Cannabis Control	Type 12 – Microbusiness license			Large outdoor cultivation license

2.1.6 Project operations

The project would operate between 8:00 am and 5:00 pm. and would generate eight full time employees and up to seven (7) temporary employees for the indoor cultivation operation. The outdoor cultivation is expected to create up to eight (8) seasonal employees at build-out. Non-storefront retail activity would include use of passenger vehicles the transport of cannabis to licensed events within the State. Retail delivery is temporarily allowed in Mono County and staff are currently working to amend county code to permanently allow delivery sales. The operation is expected to perform deliveries infrequently. In addition to employee commutes and limited cannabis transportation, the project would require regular whole-sale shipping deliveries. Based on cultivation cycles the project would generate approximately one vehicle trip per week for distribution of cultivated cannabis within the State. No public sales will take place at the premises and the premise will be closed to the public.

Section 3. Project Location and Setting

3.1 Existing and Surrounding Land Uses

The 15-acre proposed project site is located within a 124-acre parcel adjacent to the Nevada state line and approximately three miles east of Coleville, Mono County, California. The property's General Plan land use designation is Agriculture (AG 10). The project property outside of the 15-acre project site is undeveloped with the exception of access roads, irrigation ditches, and cattle fencing. The neighboring development around the site includes annual cropping systems and irrigated pastures to the west. East of the project site there are four (4) large lot residences, the nearest is 1,700 ft from the project site located in the state of Nevada. Access to the site is via a private, two-lane dirt road from East Side Lane (a county-maintained road). Access to the site crosses a private property (APN 011-150-005) owned by the same family as the project parcel.

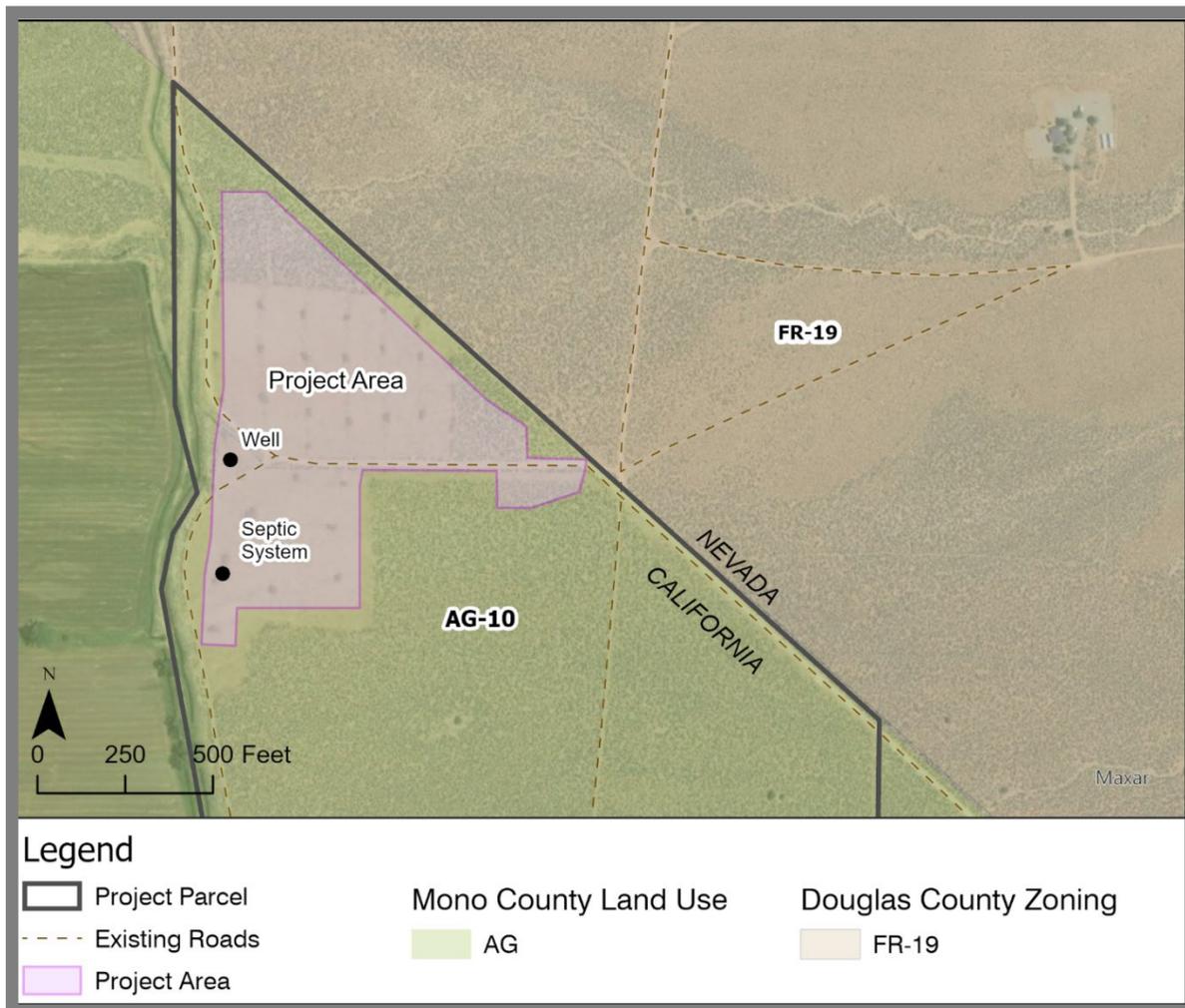


Figure 3-1. Existing and Surrounding Land Use Map

The project site has limited development of agricultural access roads, ditches, and fences. With the exception of three temporary water tanks located at the west end of the private driveway, there are no buildings or structures on-site. There is one existing well located outside the project area in the southern portion of the parcel adjacent to Highline Ditch. A septic system was constructed in the summer of 2021 and is located to the west and downslope of the proposed building pad. Land clearing and vegetation removal occurred in 2021 and was subject to code enforcement activities as described in Section 2.1.2.



Photo 1. Overview of project area.

3.2 Topography, Soils, and Drainage

The site is relatively flat (2-4% slope) ranging in elevation from 5,290 feet at the western most edge to approximately 5,185 feet along Highline Ditch.

The west side of the property borders Highline Ditch, which is used to irrigate the pastures to the west. The Highline Ditch is a diversion of the Big Slough ditch which originates as diversion of surface water from the West Walker River. There is one ephemeral stream channel that originates in the mountains to the east that flows west through the proposed outdoor cultivation area. The channel dissipates within the field and has no direct flow to Highland Ditch. Based on site reconnaissance completed on September 1, 2022, by Resource Concepts Inc.'s Sr. Biologist, there are no wetlands, riparian habitat, or other sensitive natural communities on-site.

3.3 Vegetation

Site vegetation was surveyed on September 1, 2022. The site is uniformly dominated by upland shrubs consisting primarily of big sagebrush (*Artemisia tridentata* var. *wyomingensis*) with occasional four-winged (*Atriplex canescens*), antelope bitterbrush (*Purshia tridentata*), and Mormon tea (*Ephedra nevadensis*). There is one small juniper tree within the project site and no other tree species. The six

acres of native vegetation that was previously cleared from the project area has become revegetated with native grasses intermixed with a non-native, invasive tumble mustard (*Sisymbrium altissimum*).

Existing developments surrounding the project area include annual cropping systems and irrigated pastures in the areas between generally scattered housing. Long-standing pastures and agricultural fields in rotation have lost much of their former habitat value for native vegetation and wildlife in Mono County (2015 RTP/GPU).

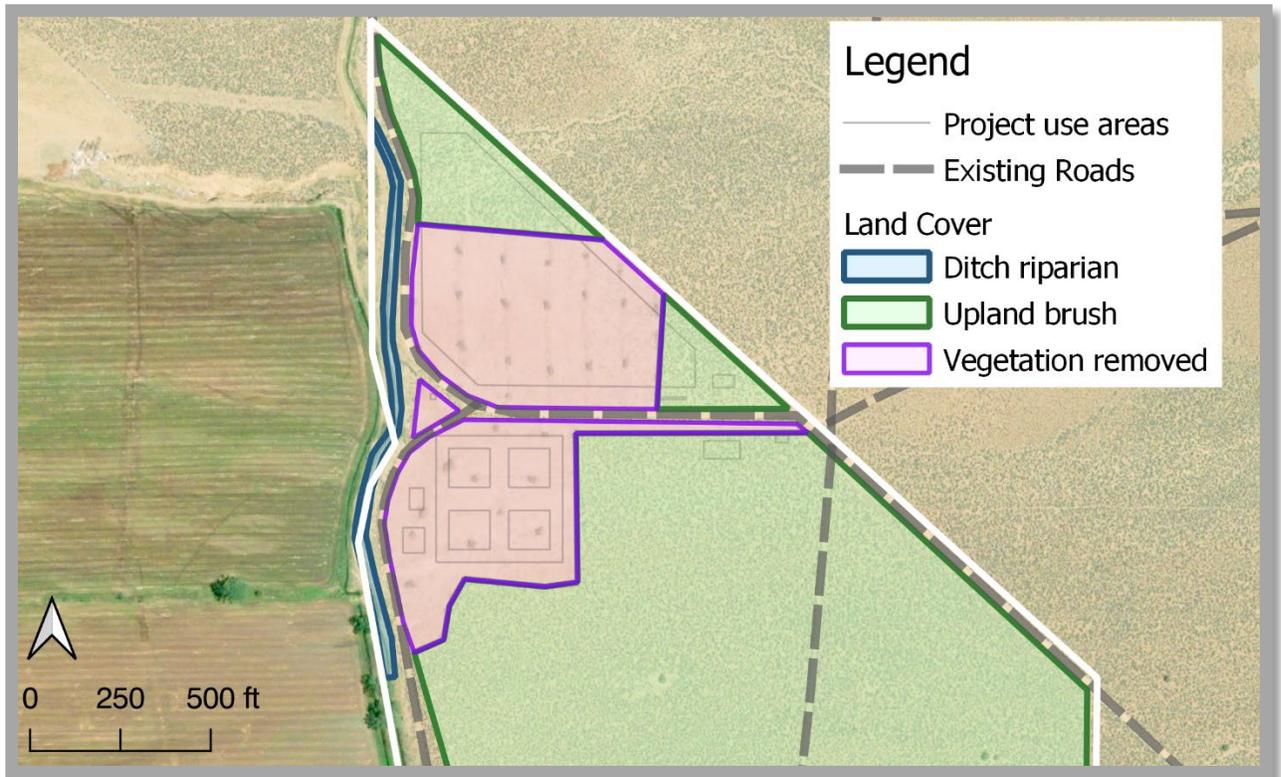


Figure 3-2. Project existing vegetation conditions map

Section 4. Environmental Impacts

Section 4 analyzes the potential for environmental impacts of the proposed project based on criteria set forth in the State CEQA Guidelines and the County's implementing ordinances and guidelines.

4.1 Aesthetics

Would the project:

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

Less than significant. There are no designated scenic vistas within proximity of the project area. The project would have no impact on a scenic vista.

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

Less than significant. The Eastern Sierra Scenic Byway (i.e., Highway 395) and State Route 89 (Monitor Pass) are the nearest designated scenic highways located approximately eight (8) miles south of the project area. The project site is not visible from the terminus of the Byway in the West Walker River canyon. From Monitor Pass on eastbound State Route 89 Monitor Pass there would be distant views of the project site including building outlines and the outdoor cannabis cultivation. The portion of Highway 395 within Antelope Valley is not a State Scenic Highway but is eligible for designation. The proposed project is located within view of a State Scenic Highway corridor the view of the project site is at a distance of greater than 7 miles and will not damage scenic resources such as trees, rock outcroppings, or historic buildings within a scenic highway. The project would have no impact on scenic resources.

- c) *In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a 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?*

Less than significant. The proposed project area is located within land use designation (AG-10), and existing development around the site includes annual cropping systems and irrigated pastures in the areas between generally scattered housing. The project indoor cultivation buildings are proposed to be up to 30 feet high at the ridgeline. The proposed heights of the nursery, lab, shop, and drying shed buildings are 25 feet. Project buildings have been designed to replicate the architectural structure of a "raised center aisle" barn. The project includes a new 1.6 mile above-ground power line to connect to Liberty Utilities distribution at Topaz Lane and Eastside Lane. There are no above ground utilities along East Side Lane as neighboring uses are off grid. Extension of the utilities to the project site would increase potential for new above ground utilities along the 1.6 miles of new utilities from the site to Topaz Lane. The visual quality of the project with utilities is compatible with neighboring agricultural land uses along Topaz Lane and Eastside Lane where above ground utilities along roads are visible. The project including installation of above ground utilities would have a less than significant impact on existing visual character or quality of public views.

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

Less than significant. The proposed project would have security/emergency lighting. No other outdoor lighting is proposed. Proper light shields and lighting design will be incorporated into the indoor cultivation buildings. Any new exterior lighting will be subject to General Plan Land Use Element Chapter 23, Dark Sky Regulations and approved by County

Planning prior to installation; therefore, the project would not create a new source or substantial light or glare and have no impact on day or nighttime views of the area.

4.1.1 Mitigation Measures

Project is subject to Chapter 23, Dark Sky Regulations. The Mono County Community Development Department shall confirm that project lighting meets the requirements of County Code Chapter 23 – Dark Sky Regulations. The applicant shall submit plans for lighting describing the location and details of proposed fixtures with building permit application or prior to installation of outdoor lighting.

4.2 Agriculture/Forest Resources

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

Would the project:

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

No impact. The project area is not located within areas defined by the California Resources Agency as Prime Farmland or Farmland of Statewide Importance. There would be no impact to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.

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

No impact. The project area has historic use of livestock grazing and is located within the agriculture land use designation (AG-10). Cannabis cultivation is an allowable use in the agriculture designation, subject to a Use Permit and Operation Permit. The project is not located on land that is part of a Williamson Act contract. The project would have no impact on agricultural use or land that is part of a Williamson Act contract.

- c) *Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 1 2220(g)) or timberland (as defined by Public Resources Code section 4526)?*

No impact. The proposed project location is currently used for grazing and is within the Agriculture (AG 10) land use designation. Cannabis cultivation is an allowable use, per Use Permit, in AG 10 land use designation. The proposed project does not conflict with existing zoning or land use designation regulations.

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

No impact. The project is not located on forestland. The project would have no impact on forest land or convert forest land to non-forest uses.

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

No impact. The project is within the Mono County General Plan land use designation of Agriculture, which allows cannabis cultivation with the issuance of a use permit. The proposed project uses are consistent with surrounding agricultural uses of irrigated alfalfa pastures and upland livestock grazing. The proposed project would not change the existing environment.

4.2.1 Mitigation Measures

No mitigation measures are proposed.

4.3 Air Quality

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

Would the project:

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

No impact. The project area is located in unincorporated Mono County and air quality is regulated by the Great Basin Unified Air Pollution Control District (GBUAPCD). With exception of the Mono Basin area and Mammoth Lakes, rural Mono County generally has very good air quality and meets state air quality standards. There are no local air quality plans relevant to the site. The proposed project would not conflict or obstruct implementation of any air quality plans.

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

Less than significant. Mono County, in general, meets all state air quality standards with the exception of state PM10 in the Mono Basin and Ozone near Mammoth Lakes (Mono County 2015). The proposed project site is located in an attainment area, and federal and state air attainment levels would not be exceeded.

c) *Expose sensitive receptors to substantial pollutant concentrations?*

No impact. There are no sensitive receptors within proximity to the project area. The nearest occupied dwelling is approximately 1,700 feet (0.3 miles) to the east located at 4400 Risue Canyon Road in Douglas County, Nevada. Sensitive receptors will not be exposed to substantial pollutant concentrations.

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

Less than significant with mitigation. Cannabis cultivation can produce odorous compounds due to the presence of terpenoid within the vegetative material. The exact odor causing compounds vary by strain/specie of the plant. Typically, moderate cannabis odors start to appear between the first 4 to 6 weeks of growth and strong odors appear during weeks 7 to 9. The intensity of the odor to the receptor varies by the quantity of odors released, local wind speed and direction, atmospheric stability or inversion height, area topography, and receptor’s distance from the odor source.

Cannabis cultivation and processing can create strong odors caused by chemicals called terpenes. The odor of terpene compounds is most commonly associated with cannabis and is produced by flowering plants. Cannabis odors can spread through the air and be sensed by surrounding receptors. Outdoor cultivation has the most potential to cause cannabis odors which are sensed by nearby receptors. Indoor cultivation can more effectively contain and/or filter cannabis odors, reducing strong odors. The project’s indoor and outdoor cannabis cultivation uses would generate odors; however, as measured at the Walker RAWS, 4.2 miles south of the project site, prevailing winds in the area are predominately from the south and northwest and aren’t directly aligned with neighboring residences or Eastside Lane.

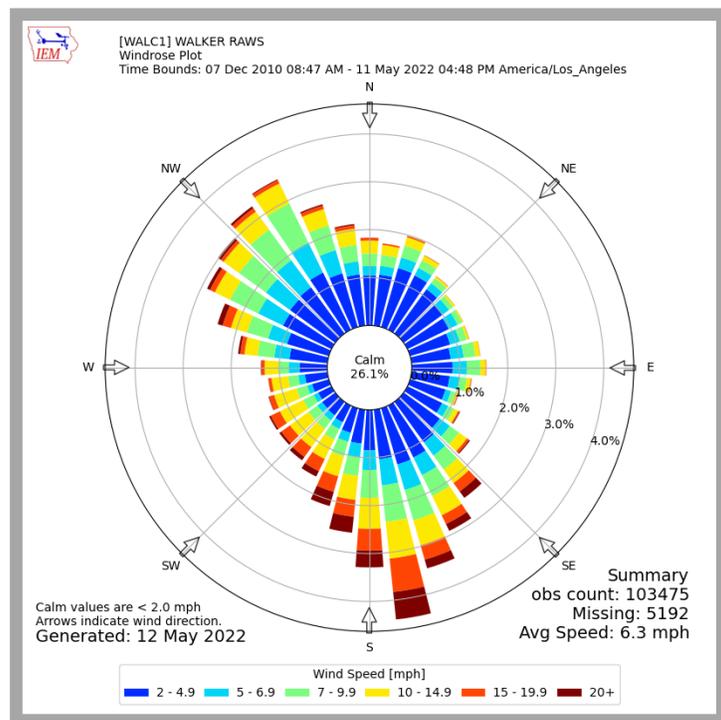


Figure 4-1. Windrose plot for Walker RAWS

There are no numerical thresholds for cannabis odor established by the county or state. Mono County policies address potential impacts of off-site cannabis odors to sensitive receptors by requiring additional setbacks for cannabis uses from sensitive receptors and odor control measures. General Plan Land Use Element Section 4.120 requires that cannabis cultivation uses be setback a minimum of 50 feet from property boundaries and 300 feet from, habitable space under separate ownership and public roads.

Land Use Element

Policy 1.L.3. Avoid, reduce, and prevent potential issues specific to commercial cannabis activities that may adversely affect communities.

Action 1.L.3.e. Regulations shall provide for the limitation of odor nuisances for adjacent uses, which may include, but are not limited to, increased setbacks, minimum distances from existing structures under separate ownership, odor control filtration devices, and ventilation requirements.

Land Use Element Development Standards Chapter 13.070

E. Odor Control.

1. An odor mitigation plan is required to demonstrate that odors generated by the commercial cannabis activity shall not unreasonably impact adjacent properties and uses, or that odor mitigation measures are not applicable due to lack of cannabis-related odor generation, location or siting, design features, or other factors.

2. An odor mitigation plan shall ensure that cannabis odors are mitigated outside of the facility; on adjacent property or public right of way; on or about the exterior or interior common area walkways, hallways, breezeways, foyers, lobby areas, or any other areas available for use by common tenants or the visiting public; or within any other unit located inside the same building as a commercial cannabis activity, and may include the following: i. Odor-control filtration and ventilation system(s) to control odors; ii. Devices and/or techniques incorporated into the facility or premise to mitigate the offsite detection of Cannabis odors.

3. An audit of the Odor Mitigation Plan and its effectiveness shall be conducted upon the issuance, and during annual inspections, of a Commercial Cannabis Operation Permit.

The project site is located away from existing habitable space under separate ownership and public roads. The distance between the project cultivation area and the nearest neighboring dwelling is 1,700 feet to the east-northeast and 0.4 miles southeast to the nearest road, Eastside Lane. Prevailing winds are not directly aligned with neighboring residences or Eastside Lane. The project does not propose odor filtration or ventilation systems; instead, the location of the project in relationship to receptors would not cause unreasonable impacts to receptors based on the siting of the cultivation areas. The cultivation use would generate cannabis odors detectable beyond the project property. Sensitivity to cannabis odor varies and adjacent uses may detect and find odors to be offensive which is a significant impact requiring mitigation.

4.3.1 Mitigation Measures

AQ - 1

- The applicant shall post signs at the property line that provide a 24-hour project contact phone number in the case of nuisance odors.
- The applicant shall report any complaints of nuisance odors to the County within 72 hours of the complaint.

4.4 Biological Resources

Would the project:

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

Less than significant with mitigation. A Biological Technical Report (BTR) was prepared for the proposed Sierra High Project (Appendix B) to evaluate the potential impacts from the project to special status wildlife, vegetation, sensitive communities, and regulated waters. Due to the project's location on the California / Nevada state border, both California and Nevada state agencies were consulted and queried for available biological resource data.

A literature search was conducted for the BA which included queries of the following databases:

- USFWS's Information Planning and Conservation (IPaC) System (2022a);
- USFWS's Critical Habitat Portal (2022b);
- California Natural Diversity Database (CNDDDB) search (CDFW 2022);
- Nevada Department of Wildlife (NDOW 2022); and
- Nevada Natural Heritage Program (NNHP 2022).

The BA evaluated potential impacts to the special status species. For the purposes of the evaluation, a special status species was considered to be:

- Species listed or proposed for listing as threatened or endangered under the ESA;
- Species that are candidates for possible future listing as threatened or endangered under the ESA;
- Species that are listed or proposed for listing by the State of California as threatened or endangered under the CESA;
- Plants considered by CDFW and CNPS to be "rare, threatened, or endangered in California" (Rare Plants Ranks as 1B and 2; California Department of Fish and Game, 2015a), and California Native Plant Society, (2015);
- Species that meet the definition of rare or endangered under the State CEQA Guidelines, Section 15380; and
- Animals fully protected in California (Fish and Game Code, §3511 for birds, §4700 for mammals, and §5050 for reptiles) and amphibians, or animal species of special concern to the CDFG (California Department of Fish and Game, 2011).

Additional species of concern that were analyzed within the BA included the Bi-State Distinct Population Segment (DPS) of Greater Sage-Grouse (*Centrocercus urophasianus*) and mule deer (*Odocoileus hemionus*).

Additionally, protection of migratory birds and their nests is regulated by the Migratory Bird Treaty Act (MBTA). Birds may forage and nest in multiple habitats and have potential to pass through the site in route to either. Therefore, potential impacts to migratory birds were also evaluated.

Special Status Plants

Based on review of the CNDDDB and USFWS IpaC list, two special status plant species were determined to have potential to occur within the project area. These species are beautiful cholla (*Grusonia pulchella*, state protected cactus/CNPS 2B.2) and Masonic rockcress (*Boechea cobrensis*, CNPS 2B.3). Both species are considered rare, threatened or endangered in CA by the California Native Plant Society (CNPS) and are associated with sandy soils within sagebrush communities. A field survey for special status plant species was completed on September 1, 2022, by RCI Sr. Biologist. All plant species encountered were identified to determine if it was a species of concern. Neither beautiful cholla or Masonic rockcress were observed during the survey (both are species of concern in the region – is this accurate? Maybe include the language to tell readers why these 2 species are mentioned). Based on the survey results and assessment of the site, the BTR determined that neither beautiful cholla or Masonic rockcress are likely to occur within the project site. Reference the BTR in Appendix B.

Based on the current site plan (Figure 2 in Appendix A), implementation of the proposed project would impact up to five acres of upland sagebrush shrub habitat from grading and construction of the four indoor cultivation buildings and associated support buildings (e.g., water tank, shop, and lab), and access road improvements. Additionally, approximately ten acres of upland shrub habitat will be impacted during Phase 3 of the project through removal of vegetation for outdoor cultivation. If present, direct effects to special status plant species or their potential habitat could occur when plants or habitat are physically impacted by activities associated with the proposed project. Direct impacts may include physically breaking, crushing, or uprooting sensitive plants by driving over them with construction equipment, trenching, filling, or other grading activities during site development. However, based on the results of the botanical survey, evaluation of on-site soils, and findings of the BTR, it was determined that it is unlikely for any special status plant species to occur within the project site. Impacts to special status plant species is determined to be less than significant.

Vegetation removal and soil disturbance construction of the indoor cultivation facility, improvements to the access road, and disturbance associated with power line construction could create conditions for the establishment of undesirable weed species. Once established, invasive and noxious weeds could negatively and indirectly affect native species by competing for resources such as water and light, production, and release of chemical compounds that inhibit the growth of other plants. In turn, this effect can change the community composition through elimination or reduction of native plant species, or by changing the vegetation structure. The changes in community composition or vegetation structure could affect fire regimes and can also negatively affect habitat for wildlife. These impacts would be reduced to less than significant with incorporation of Mitigation Measures BIO-2 and BIO-3.

Special Status Wildlife

The on-site sagebrush shrub community provides habitat for 12 special status wildlife species. These include seven state protected bat species and five special status bird species (reference the BTR in Appendix B).

There is suitable foraging habitat for bats on-site but no suitable roosting habitat present. Because of the abundance of similar foraging habitat surrounding the project area, it is determined there will be less than significant impacts to the seven bat species.

There is potential for five species of special status birds. Four of these species (Golden Eagle, Swainson's Hawk, Northern Harrier, and Prairie Falcon) may utilize the site for foraging, but there is no suitable nesting habitat for these species within the project area. Similar to the bat species, the proposed project will have less than significant impact on these four species.

The Brewer's sparrow is identified as having potential to nest on-site. The Brewer's sparrow is listed as a USFWS Bird of Conservation Concern and given a S3 ranking by the State due to its declining population. Brewer's sparrow tend to nest in low sagebrush and other shrubs. Therefore, Brewer's sparrow, along with other nesting birds, have the potential to be impacted by clearing and grading activities that remove potential nesting habitat. If clearing occurs during the nesting season, the project could result in direct impacts to the Brewer's sparrow and other nesting birds should they be present. Indirect effects from elevated noise and increased human activity may result in nest abandonment if nesting birds are present within 200 feet. These potential significant impacts are reduced to less than significant when Mitigation Measure BIO-3 is implemented.

The Bi-State Distinct Population Segment (DPS) of Greater Sage-Grouse (*Centrocercus urophasianus*) is another species of concern to Mono County but is not listed at the state or federal level. Potential impacts to Greater Sage-Grouse, if present, from the proposed project could include loss of habitat, increased vehicular traffic and potential for roadkill, trampling of nests or activities that cause nest abandonment, and introduction/expansion of invasive species that modifies habitat quality. Additionally, the construction of aboveground transmission pole lines contributes to the fragmentation of sage-grouse habitat and increases the risk of predation by providing predator perches in sagebrush habitat. However, the likelihood of sage-grouse being present on site is considered to be very low based on the presence of low-quality sagebrush habitat that surrounds the Coleville area (2015 RTP/GPU) and lack of known Greater Sage-Grouse leks or radio-marked sage-grouse tracking locations in the vicinity of the project area (NDOW 2022). Further, no sage grouse were observed during the initial site reconnaissance in February 11, 2021 or during site survey on September 1, 2022. Potential impacts to sage-grouse from the proposed project is determined to be less than significant.

There are no known mule deer migration corridors through the project area (NDOW 2022, BIOS 2022), but mule deer may potentially use the on-site shrub habitat for overwintering. Site development and increase in human activities have the potential to impact survivorship of mule deer due to the reduction of critical browse and vehicle collisions (2015 RTP/GPU). However, based on the minimal size of impact to potential habitat (15 acres) relative to the surrounding availability of suitable wintering habitat and the minimal increase in traffic from the proposed project, potential impacts to mule deer are determined to be less than significant.

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

No impact. The site is uniformly dominated by upland shrubs consisting of big sagebrush and four-winged saltbrush, rabbitbrush and Mormon tea. There one juniper tree on-site. There are no wetlands, riparian habitat, or other sensitive natural communities on-site. The proposed project will have no impact on any riparian habitat or other sensitive natural communities.

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

No impact. Based on review of the National Wetland Inventory Mapper (February 18, 2022) and field reconnaissance, there are no wetlands within the project area. The proposed project will have no impact on state or federally protected wetlands.

- 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?*

Less than significant. Occupied mule deer habitat is known to occur throughout the site (NDOW 2022). The West Walker Herd of mule deer in Antelope Valley use available habitat in Walker, Coleville, and Topaz as winter range during the November 1 to April 30 period; however, there are no known migration corridors through the project area. Based on review of the California Department of Fish and Wildlife Biological information System, there are no mapped deer migratory corridors (CDFW BIOS 2022), and the proposed project is not anticipated to have any impact on mule deer migration corridors. Additionally, there are no aquatic resources sufficient to support the movement of migratory fish. The proposed project will have no impact on migratory fish or wildlife species or migration corridors.

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

No Impact. Based on review of the Mono County General Plan, the proposed project will have no conflict with any local policies or ordinances protecting biological resources.

- 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?*

No Impact. There are no adopted habitat or conservation plans that affect the project site. The proposed project will not conflict with any provisions of an adopted habitat or conservation plans.

4.4.1 Mitigation Measures

Mitigation Measure BIO-1- Nesting Birds Surveys

The project applicant shall implement the following practices for protection of bird species with the potential to nest within the project area.

- Pre-project surveys for nesting birds and raptors will be conducted in suitable nesting habitat within 500 feet of vegetation removal, construction, and development activities, and will be reviewed and accepted by the Mono County Community Development Department prior to site

disturbance or construction activity. Determination of habitat suitability, and whether a pre-project survey is required should be based on a reconnaissance field assessment of habitat conditions before initiating projects in these areas.

Survey Timing: March 1 to August 31

- If an active bird nest is located during the pre-project surveys, the project proponent will notify Mono County and the CDFW. To avoid disturbances to or loss of active nest sites, between March 1 and August 31, project activities would be delayed within 0.25 mile of (or at a distance directed by the appropriate regulatory agency) the nest to avoid disturbance until the nest is no longer active. Project activities include vegetation removal, earth moving, and construction. The 0.25-mile buffer may be reduced through consultation with Mono County and/or the CDFW Biologist.

Mitigation Measure BIO-2 – Weed Surveys

Prior to construction, the entire project area shall be surveyed for noxious weeds. All occurrences of noxious weeds would be flagged and avoided.

Mitigation Measure BIO-3-- Weed Free Certification

Straw, mulch, or gravels used for erosion control shall be certified weed-free.

4.5 Cultural Resources

Would the project:

- a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?*

No impact. On March 30, 2022, a Class III Archaeological Inventory of the proposed project area was completed. The inventory covered approximately 18 acres within the northern portion of the parcel where all development is proposed. Prior to the site visit, pertinent site records and documentation was requested of the California Historic Resource Information System, Eastern Information Center (EIC) and available in the Nevada Cultural Resources Information System were consulted. The request included documentation of existing resources, reports, historic properties, determinations of eligibility, properties listed on the California Inventory of Historical Resources (1976), and any historic maps and local inventories within a 0.5- mile buffer of the project area.

Based on the findings of the data request, no cultural resource inventories or cultural resources have been recorded within 0.5 mile of the project parcel. The record search by the EIC indicates that no site listed on the National Register of Historic Places, the California Register of Historical Resources, California Historical Landmarks or California Points of Historical Interest lie within the project area. The findings of the field survey resulted in the location of a single isolated horseshoe. No other cultural materials or archaeological sites were encountered (reference Appendix C). The proposed project will have no impact on the significance of historical resources.

- b) *Cause a substantial adverse change in the significance of an archaeological resource as defined in 15064.5?*

Less than significant with mitigation incorporated. As described above, no archaeological sites were identified through the records search or site reconnaissance. It is possible that unidentified historical or archaeological resources could be discovered during construction. Damage to an unknown unique archaeological resource or historical resource would be a potentially significant impact. Implementation of Mitigation Measure CR-1 would reduce the potential for impacts to archaeological sites to less than significant.

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

Less than significant with mitigation incorporated. No evidence obtained during documented research suggests that any prehistoric or historic-period human interments are present within or in the immediate vicinity of the project site. However, there is a possibility that unmarked, previously unknown Native American or other graves could be present within the project site and could be uncovered by project-related construction activities.

California Health and Safety Code Section 7050.5 and Public Resource Section 5097 require that, if human remains are discovered during any construction activities, potentially damaging ground-disturbing activities in the area of the remains shall be halted immediately, and the Mono County coroner and the Native American Heritage Commission (NAHC) shall be notified immediately. If the remains are determined by NAHC to be Native American, the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. Following the coroner's findings, the archaeologist, the NAHC-designated Most Likely Descendant, and the landowner shall determine the ultimate treatment and disposition of the remains and take appropriate steps to ensure that additional human interments are not disturbed. Implementation of project Mitigation Measure CR-2 would ensure compliance with the Safety Code Section 7050.5 and Public Resource Section 5097 and reduce the potential for impact to less than significant.

4.5.1 Mitigation Measures

CR-1 Discovery of Cultural or Tribal Resources

If any prehistoric or historic-period subsurface archaeological features or deposits are discovered during construction, all ground-disturbing activity within 25 feet of the resources shall be halted, and a qualified professional archaeologist and/or Tribal representative shall be retained to assess the significance of the find. If the find is determined to be significant by the qualified archaeologist (i.e., because it is determined to constitute either a historical resource or a unique archaeological resource), or Tribal representative, a plan shall be prepared to address the appropriate procedures to protect the integrity of the resource and ensure that no additional resources are affected. Procedures could include, but would not necessarily be limited to, preservation in place, archival research, subsurface testing, or contiguous block unit excavation and data recovery.

CR-2 Unanticipated Discovery of Human Remains

If human remains are encountered during construction, all ground disturbance activities within 150 feet of the discovery shall be suspended and the construction manager shall immediately notify the County coroner. If the human remains are determined to be of Native American descent, the coroner shall

notify the NAHC within 24 hours of identification. The NAHC shall identify and immediately notify the Most Likely Descendant (MLD) of the deceased Native American. Within 48 hours of being granted access to the site, the MLD shall complete the inspection of the site of the discovery and make recommendations to the applicant/landowner for the treatment or disposition of the human remains and any associated funerary objects. All measures, as required by the County, shall be implemented under the supervision of the MLD and/or tribal representative.

4.6 Energy

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?*

Less than significant. Electrical energy is provided in the Antelope Valley area of Mono County by Liberty Utilities, Inc. Liberty Utilities supplied power is generated by a mixture of sources and includes approximately 33% renewable sources. There is no natural gas utility available in the Antelope Valley and liquid propane gas (LPG) is provided to individual customers from local vendors.

The proposed project will use energy primarily for initial construction of infrastructure and long-term cultivation and manufacturing uses.

Construction

Energy needs for project construction would be temporary and include the use of automotive fuels consumed to transport construction crews and materials to and from the site. The design and operation of the project buildings are subject to California Building Code Standards. The energy expenditure required to construct the initial indoor grow facility and associated structure would be non-recoverable; however, it would not be consumed in a wasteful, inefficient, or unnecessary manner.

Long-term Operation

Energy use for the project would include gas for vehicles and equipment and propane for co-generation of electrical power. The proposed indoor cultivation operation would use artificial LED lighting for plant growth. The project estimates annual energy demand of 0.35 MWh\yr.

The project site is currently not connected to utilities, including electricity or natural gas. The project proposes to initially operate off-grid due to the distance to existing electrical utility of approximately 3,000 feet. During Phases 1 and 2 of the project, an on-site combined heat and power propane generator (100 horsepower) would provide all electricity and heating to the project. Propane storage would be within three 1,000-gallon propane tanks in Phase 1 followed by a central 30,000-gallon tank in Phase 2. Phase 3 of the project includes interconnection to Liberty Utilities and a propane system would be used for backup only.

Table 4-1. Annual Operational Energy Consumption

Energy Type	Annual Energy Consumption
Phase 1 and 2 -Operations (Off-grid)	
Propane – Electricity & Heat Cogeneration	1,140,695 kBTU\yr 12,466 gallons propane equivalent
Phase 3 – Operation	
Electricity from the grid	.34 megawatt-hours per year

Based on CalEEMod 2020.4.0

The project is subject to California Building Standards, Code requirements and standard conditions of approval required by the County or other agencies, including the energy conservation measures required in Title 24 Building Energy Efficiency Standards for 2019. For these reasons, the project’s consumption of electricity, gasoline, and diesel would not be considered wasteful, inefficient, or unnecessary.

4.6.1 Mitigation Measures

No mitigation measures are proposed.

4.7 Geology and Soils

Would the project:

- a) *Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:*
 - i) *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*
 - ii) *Strong seismic ground shaking?*
 - iii) *Seismic-related ground failure, including liquefaction?*

Less than significant. The project is not located in an Alquist-Priolo fault hazard area as delineated by State. The proposed project is not located on or near an active fault zone (California Dept of Conservation 2022). Based on the results of a geotechnical investigation completed by Sierra Geotechnical Services Inc., there are no active fault zones within the site. The nearest fault zone with potential for strong ground shaking is the Antelope Valley fault zone, located approximately 3.43-miles west of the site (SGS 2021). The estimated most recent fault activity occurred during the last 3,000 years. An earthquake of magnitude 4.5 occurred on August 8, 2022 located 3.4 miles south of the project site and did not cause damage. Seismic risks are a constant throughout Mono County and the project must comply with current seismic safety standards. These standards reduce seismic hazards to a level of ‘acceptable risk’ (2015 RPT/GPU EIR). Sierra Geotechnical Services found that site is suitable for construction after evaluation of soils and potential seismic hazards. The geotechnical report

recommends two to three feet of over excavation and compaction in lifts to support building foundations. The geotechnical review of the project soil conditions finds negligible potential for ground failure or liquefaction due to seismic activity.

iv) Landslides?

No impact. The project area is located on relatively flat (2-4% slope) ground and is not located adjacent to terrain with landslide hazards. There is no potential for landslides.

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

Less than significant. Project implementation will result in soil excavation (approximately three acres) for the development of the indoor cultivation building pad, associated structures, and road improvements that could result in erosion. To minimize erosion potential, all cut and fill slopes shall be a maximum of 2:1 slopes and all areas of temporary disturbance will be stabilized upon project completion. The project proposes approximately three acres of soil disturbance that will require authorization under the State's General Construction Permit, which includes the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) that would minimize site erosion and loss of topsoil. Implementation of the SWPPP will include installation of effective Best Management Practices (BMPs), including minimization of vegetation removal and installation of temporary erosion and sediment controls that would reduce erosion and sediment loss. Additionally, any areas of temporary disturbance will be reseeded upon completion of construction and protected by installation of an erosion control fabric or suitable alternative.

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

Less than significant. The project area is located on relatively flat (2-4% slope) ground with soils that consist of dense sands with minor fines and gravels. Based on the slope, there is no potential landslides or lateral spreading. The geotechnical review of the project soil conditions finds negligible potential for ground failure or liquefaction (SGS 2021).

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?

Less than significant. Expansive soils are soils that swell when subjected to moisture. Shrink/swell potential is the relative change in volume to be expected with changes in moisture content; that is, the extent to which the soil shrinks as it dries or swells when it gets wet. The extent of shrinking and swelling is influenced by the amount and kind of clay in the soil. Shrinking and swelling of soils cause damage to building foundations, roads, and other structures. Soils in the immediate vicinity of the proposed project area consist of dense sands with minor fines and gravels. Based on these findings, there is a very low shrink/swell potential at the site (SGS 2021).

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

Less than significant. A geotechnical investigation and report were prepared by Sierra Geotechnical Services, Inc. The report found that soils are adequate to serve proposed on-site septic systems.

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

Less than significant. The project soils and geology are composed largely of quaternary alluvium deposits of the Pleistocene-Holocene, which have a low probability of containing unique paleontological resources or unique geologic features. The project would require excavation to a depth of 5-10 feet below the surface. It is unlikely the construction activities would disturb paleontological resources due to the depth of earthwork and age of underlying soils and geology.

4.7.1 Mitigation Measures

No mitigation measures are proposed.

4.8 Greenhouse Gas Emissions

Would the project:

- a) *Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*
- b) *Conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?*

Less than significant. The project would result in emissions of greenhouse gases (GHGs) through the construction and operation of the project. GHGs prevent the escape of heat energy from Earth's atmosphere. Carbon dioxide (CO₂), methane (CH₄), nitrous oxide, and water vapor are the primary constituent GHG. These gases occur naturally in the atmosphere and human activity further increases GHG emissions. Increases in GHG in the atmosphere result in greater greenhouse effect, increased global surface temperatures, and changes to global climate patterns. GHGs are measured as CO₂ equivalent, or CO₂E, a unit of measurement that equalizes the potency of GHG.

The GHGs emitted during construction would come from diesel fuel combustion from off-road construction equipment and diesel or gasoline combustion from on-road vehicles. The primary GHG generated from these processes would be CO₂, with smaller amounts of emissions of CH₄ and nitrous oxide (N₂O). Construction emissions would permanently cease at the end of the project. The project would have an incremental, short-term, and one-time contribution to GHG emissions within the context of the county and region, the individual impact is considered less than significant.

According to analysis of the project using CalEEMod Version 2020.4.0, the project would emit carbon-dioxide-equivalent substances, or GHG, in amounts shown in the table below. The analysis takes into account both operational impacts (including area-, energy-, mobile-, waste-, and water-related sources) and construction impacts; because construction is a one-time activity, the construction emissions are amortized, or spread, across a 30-year period and then added to operational impacts.

Table 4-2. Greenhouse Gas Emissions (metric tons per year)

Source	CO ₂ E
Construction (239 CO ₂ E, 30-year amortization)	8
Area	1.3
Energy	91.8
Mobile	397.3
Waste	39.8
Water	43.8
Total	582

Since there is no adopted or accepted numerical threshold of significance for GHG emissions applicable to the county, the methodology for evaluating the project’s impacts related to GHG emissions focuses on its consistency with statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions.

Notwithstanding, for informational purposes, the analysis also calculates the amount of GHG emissions that would be attributable to the project using CalEEMod 2020.4.0. The primary purpose of quantifying the project’s GHG emissions is to satisfy CEQA Guidelines Section 15064.4(a), which calls for a good-faith effort to describe and calculate emissions. The estimated emissions inventory is also used to determine if there would be a reduction in the project’s incremental contribution of GHG emissions as a result of compliance with regulations and requirements adopted to implement plans for the reduction or mitigation of GHG emissions. However, the significance of the project’s GHG emissions impacts is not based on the amount of GHG emissions resulting from the project.

The project is consistent with the Mono County’s Resource Efficiency Plan and energy efficiency policies, which promote, but do not require, energy efficiency by private development.

Regional Transportation Plan Policy

Policy 3.A. Reduce greenhouse gas (GHG) emissions through local land use and development decisions, and collaborate with local, state, and regional organizations to promote sustainable development.

Land Use Element

Policy 1.B.2. Increase greenhouse gas emission mitigation and adaptation planning efforts through local land use and development decisions, and collaborate with local, state, and regional organizations to promote sustainable development.

The proposed project would not conflict with an applicable plan, policy, or regulation adopted to reduce the emissions of greenhouse gases.

4.8.1 Mitigation Measures

No mitigation measures are proposed.

4.9 Hazards and Hazardous Materials

The operation of the cannabis cultivation will require the use of fertilizers and pesticides in significant quantities. The most common chemicals used in cultivation operations are pesticides, herbicides similar to other agriculture operations. The project would utilize smaller 1,000-gallon propane tanks during the initial phase of operation followed by a central 30,000-gallon tank. The proposed indoor cultivation buildings would have storage areas for hazardous materials separated from the primary uses of the building. The outdoor cultivation operation would use shipping containers for storage of fertilizers and herbicides. Propane and cannabis cultivation fertilizers and herbicides would be transported along US Highway 395 and local routes to the project site.

Would the project:

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

Less than significant. Construction activities would involve the use of hazardous materials, such as fuels, gasoline, and oil. The State of California Department of Toxic Substances Control (DTSC) is the administering agency and the Certified Unified Program Agency (CUPA) for Mono County with responsibility for regulating hazardous materials handlers, hazardous waste generators, underground storage tank facilities, above ground storage tanks, and stationary sources handling regulated substances. A Hazardous Materials Business Plan (HMBP) is required of businesses in Mono County that handle, use, generate, or store hazardous materials. In addition to the HMBP, the Commercial Cannabis Operations Permit conditions require a storage plan for pesticides.

The project would be required to comply with existing laws and regulations regarding the transportation, use, and disposal of hazardous materials. These regulations are specifically designed to protect public health and the environment and must be adhered to during project construction and operation. Because the project would comply with applicable regulations, the impact would be less than significant.

- 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?*

Less than significant. Mono County regulates cannabis use of pesticides and growing chemicals by storage and use requirements. In addition, the Certified Unified Program Agency protects public health and the environment from hazardous material use through storage requirements and measures to contain accidental releases, proper handling and disposal requirements, and disclosure of operations involving hazardous materials to the county and fire protection agencies to ensure proper response if accidents occur (e.g., spills and fires).

The use of restricted pesticides on cannabis cultivation is prohibited. Harvested cannabis is required to be tested for harmful constituents prior to retail sale. Existing regulation and programs described above would limit the potential for exposure of people and the environment to hazardous materials. This impact would be less than significant.

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

No impact. The project would not emit hazardous emissions or handle acutely hazardous material. The project is not located within one-quarter mile of an existing school. The nearest schools, Coleville High School and Antelope Valley Elementary School are 4.6 miles from the project site.

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

No impact. The project area is not within a site listed as a hazardous material site pursuant to Government Code section 65692.5.

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

No impact. The project area is not within an airport land use plan or within two miles of a public use airport.

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

No impact. Mono County has adopted an Emergency Operations Plan (EOP), which designates Highway 395 as a primary evacuation route. The proposed project would not impair the implementation of or physically interfere with the county's adopted emergency response or evacuation plan.

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

Less than significant. The project area is within an area of moderate wildfire risk and may expose people and structures to risk of loss, injury, or death. A discussion of specific wildfire risks and applicable regulations is included in Section 4.20— Wildfire of this Initial Study.

4.9.1 Mitigation Measures

No mitigation measures are proposed.

4.10 Hydrology and Water Quality

Would the project:

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

Less than significant. The proposed project has potential to degrade water quality through temporary construction and long-term operation of the facility. Site leveling or grading would result in the removal of vegetation that would temporarily increase soil exposure to wind and water and reduce the local soil resistance to erosion during rainfall events. Stormwater runoff from the site could affect water quality within Highland Ditch, a tributary to the West Walker River. Because the project would disturb more than 1 acre of soil, it would be subject to the typical restrictions and requirements that address erosion and runoff under the State Water Resource Control Board (SWRCB) Construction General Permit, which includes the preparation and implementation of a SWPPP to minimize site erosion and indirect effects to water quality. The project would incorporate effective BMPs, including minimization of vegetation removal and installation of temporary erosion and sediment controls that would reduce erosion and stormwater runoff effects. In the long-term, site drainage will be directed through a series of constructed swales to a stormwater detention basin located west of the graded pad containing the indoor cultivation building that allows infiltration and minimizes impacts to water quality and flow into Highland Ditch. The project would not violate any water quality standards or waste discharge requirements during construction.

Long-term cultivation operation and maintenance has the potential to discharge fertilizers, pesticides, and other chemicals to surface waters or groundwater. The SWRCB has developed a policy for water quality control to establish principles and guidelines for cannabis cultivation, as well as the Cannabis General Order (SWRCB Order WQ 2019-0001-DWQ). The Cannabis General Order includes enforceable requirements for cannabis cultivators to ensure their operations do not impact water resources. Enrollment in the Statewide Cannabis General Order is required for all legal cannabis cultivation facilities and is a required step to obtaining a CalCannabis license for cannabis cultivation. To obtain coverage under the waiver or enroll under the General Order, the discharger is required to submit an online application and application fee and relevant technical reports. At a minimum, the applicant would be required to provide a site management plan, nitrogen management plan, and site closure report.

The proposed project has also obtained the appropriate permits from the Mono county Environmental Health Department for installation of a septic system meeting the requirements of Mono County and the Lahontan Basin Plan. Because applicable state and local regulations require water quality control measures for construction and operation of the project, this impact would be less than significant.

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

Less than significant. In general, site runoff flows east to west and typically infiltrates, providing for groundwater recharge. Post-construction runoff from cultivation activities will be kept to a minimum through maximum conservation efficiency. The indoor operation utilizes computerized monitoring to keep runoff to an absolute minimum. Year-round indoor cultivation will use up to 2,600 gallons per day

at maximum operations, or 2.9-acre feet per year, based on industry standards for indoor cannabis growth at maximum operations. The outdoor cultivation would use a maximum of 4,000 gpd for a 240 day growing season, approximately 29.5 acre-feet per year. The total project demand is estimated as 33.4 acre feet per year.

Outdoor cultivation utilizes raised beds with mulch-covered drip tapes to maximize water usage by avoiding runoff and minimizing evaporation. Outdoor seasonal demand will be kept to 4,000 gallons per acre per day. These amounts constitute approximately 1% of the available water from the existing well/pump (Sierra High CUP application, 2021). The Department of Water Resources prioritizes groundwater basins based on the sustainability of groundwater use. Antelope Valley (6-007) is ranked as Very Low priority basin for low population and groundwater use. The estimated total of groundwater recharge for the Antelope Valley was between 15,600 AF and 22,800 AF per the 2014 Feasibility Assessment of a Water Transactions Program in the Walker River Basin (Carroll and Pohll 2013). Based on the projected water demand, the proposed project will have less than a significant impact on groundwater supplies.

To offset impacts to infiltration and groundwater recharge from an increase in impervious surface area associated with the indoor cultivation facility, constructed swales will serve to direct flows around the indoor cultivation pad and into a detention basin designed to capture the 25-year storm event and allow for stormwater infiltration and groundwater recharge. With the implementation of the drainage swales and stormwater detention basin, impacts to groundwater recharge are less than significant.

- c) *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*
 - i) *result in substantial erosion or siltation on- or off-site;*

Less than significant. Site leveling or grading would result in the removal of vegetation that would temporarily increase soil exposure to wind and water and reduce the local soil resistance to erosion during rainfall events. Stormwater runoff from the site could affect water quality within Highland Ditch, a tributary to the West Walker River. Because project grading would result in greater than 1 acre of soil disturbance, the project is subject to the SWRCB's Construction General Permit, which includes the preparation and implementation of a SWPPP that would minimize site erosion and indirect effects to water quality. The project would incorporate effective BMPs, including minimization of vegetation removal and installation of temporary erosion and sediment controls that would reduce erosion. Upon project completion, all temporarily disturbed areas would be re-seeded in adherence to Mitigation Measure WQ-1.

- ii) *substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;*

Less than significant. In general, the site drains via sheet flow east to west. Water that does not infiltrate and provide for groundwater recharge, discharges to the Highland Ditch. To offset the reduction in infiltration from an increased in impervious surface area associated with the indoor cultivation facility and associated infrastructure, a four-foot-wide constructed drainage swale will direct flows around the indoor cultivation pad and into a detention basin designed to capture the 25-year storm event and allow for stormwater infiltration, groundwater recharge, and sediment capture. Implementation of the drainage

swales and stormwater detention basin allows for groundwater recharge and sediment retention, the project would not substantially increase the rate of surface runoff that would result in flooding on or off site.

- iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or*

Less than significant. Runoff from the site is kept to a minimum through maximum conservation efficiency. The indoor operation utilizes computerized monitoring to keep runoff to an absolute minimum. Year-round indoor cultivation will use less than 2,600 gallons per day at maximum operations. Outdoor cultivation utilizes raised beds with mulch-covered drip tapes to maximize water usage by avoiding runoff and minimizing evaporation. Increases to surface runoff from increased impervious surfaces associated with the indoor cultivation facility pad will be directed through constructed swales to a stormwater detention basin. The proposed project would not contribute runoff that would cause the capacity of the planned stormwater drainage system to be exceeded.

- iv) Impede or redirect flood flows?*

Less than significant. The project site is located within an area with minimal flood risk as identified on FEMA flood maps (see Figure 4 in Appendix A), and therefore, would not have potential to impede or redirect flood flows.

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

Less than significant. The project site is located within an area with minimal flood risk as identified on FEMA flood maps (see Figure 4 in Appendix A). The project area is not located in an area with substantial risk of dam failure, tsunami, or seiche.

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

No impact. The project is located in the Antelope Valley Groundwater Basin which is prioritized as 'Very Low' by the California Department of Water Resources. No groundwater management plan exists for the Antelope Valley Groundwater Basin.

4.10.1 Mitigation Measures

WQ-1. Reseeding of Disturbed Areas: Directly following construction, disturbed areas shall be reseeded with a certified weed-free seed mix. Seeded areas shall be watered as needed until fully established.

4.11 Land Use and Planning

Would the project:

- a) Physically divide an established community?*

No impact. The project is located in a rural area in the vicinity of established communities in Antelope Valley. The project would not 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?*

Less than significant. The project site is within the Agriculture land use designation, which is intended to preserve and encourage agricultural uses and provide for the orderly growth of activities related to agriculture. The project is subject to the county's cannabis use and operations permit process and relevant requirements.

4.11.1 Mitigation Measures

No mitigation measures are required.

4.12 Mineral Resources

Would the Project:

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

Less than significant. Mono County contains mineral resources and aggregate mining activity is present in Antelope Valley. The project is located in an area designated as MRA-1 by the 2001 General Plan Master Environmental Assessment (MEA). MRA-1 designates areas where adequate information indicates that no significant mineral deposits are present, or where it can be judged that there is little likelihood for their presence. There are no official Mineral Land Classification Studies published by the Department of Conservation for Mono County. The Agriculture land use designation allows for mineral exploration with a use permit but does not allow for mineral extraction or mining without a land use designation change to Resource Extraction (RE). Based on the Mono County Mineral Resource Classification of MRA-1 for the proposed project area, the potential impact to mineral resources of state or local importance is less than significant.

4.12.1 Mitigation Measures

No mitigation measures are required.

4.13 Noise

Would the project:

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

Less than significant. There are no noise-sensitive areas (e.g., residences, schools, hospitals, rest homes, long-term medical or mental care facilities, and other uses deemed noise-sensitive by the local

jurisdiction, such as libraries or places of worship) located near the project area. The project area is located approximately 1,700 feet from the nearest receptor; a residence located to the northeast.

Mono County Code 10.16 defines limits for excessive noise and sets noise level limits for land use. The limit set by ordinance for agricultural uses per 10.16.060 (A) is 65dBa (A-weighted unit of sound pressure level as measured at the property boundary). Construction noise is not allowed between 7:00 pm and 7:00 am on weekdays or on weekends, per County Code.

The primary source of noise from the project is temporary construction noise and operation of the on-site propane generator. Minor sources of noise include gas powered vehicles, agricultural equipment, and tool use. The project proposes up to four propane gas generators, one for each indoor cultivation building. The proposed generators would be located within enclosures as part of the cultivation building. The location of generators within enclosures and the location of proposed cultivation buildings approximately 150 feet from the property line are project features which reduce the noise impacts at the property boundary and to sensitive receptors. With the installation of the power line connection to Liberty Utilities, generator use would be reduced to emergency backup only.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less than significant. The project will not generate excessive groundborne vibration or groundborne noise levels. Construction will not require pilling or other construction methods that generate significant groundborne vibration.

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?

The project area is not located within the vicinity of a private airstrip or within two miles of a public airport. There are no public airports in northern Mono County; the nearest public airport in Mono County is 27 miles away in Bridgeport (Bryant Field). The project would not expose those working or residing near the project area to excessive noise levels from airport operations.

4.13.1 Mitigation Measures

No mitigation measures are proposed.

4.14 Population and Housing

Would the project:

- a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*
- b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

Less than significant. The project does not include construction of new housing and would not directly cause population growth. The project extension of electrical power would be to serve the project property only.

Per the 2020 Census, the population of Mono County is 14,395, with an unincorporated population of 6,132. The population of Antelope Valley (Coleville, Topaz, and Walker) is 1,402. In Antelope Valley, there were 842 housing units as measured by the 2017 Housing Needs Assessment. Housing availability within Antelope Valley was impacted by the Mountainview Fire in 2020, which damaged or destroyed approximately 100 housing units.

The General Plan directs the location and density of future population and housing across the unincorporated area. The Agriculture (AG) land use designation and the allowance of cannabis cultivation by the General Plan considers the contribution to employment and population growth of the use. The project proposes no changes that would indirectly allow growth exceeding General Plan densities on other properties.

The project would generate eight full time employees and up to seven (7) temporary employees for the indoor cultivation operation. The outdoor cultivation is expected to create up to eight (8) seasonal employees at build-out. Employee housing is not proposed as part of the use permit project. It is anticipated that farm labor housing would be established on the project property for employees as-needed. Farm labor housing and single-family dwellings are allowed uses in the Agriculture land use designation subject to county building requirements.

The project would not displace people or housing. The subject property is open, undeveloped land without existing dwelling units.

4.14.1 Mitigation Measures

No mitigation is proposed.

4.15 Public Services

Fire protection is provided by the Antelope Valley Fire Protection District (AVFPD). The District is staffed by volunteers and the nearest fire station is the Coleville Station located on Larson Lane approximately three miles from the project site.

The Mono County Sheriff's Office provides law enforcement service to unincorporated Mono County, including Antelope Valley. The nearest sheriff's office is located in Bridgeport, approximately 40 miles from the project site.

The project is located within the Eastern Sierra Unified School District, which serves unincorporated Mono County. Antelope Elementary and Coleville High are local schools serving students within Antelope Valley.

The nearest recreation facility is Walker Community Park located in Walker, California.

Would the project:

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

i) *Fire Protection?*

Less than significant. In general, fire protection related activities include plan review, site/structure inspections, fire code enforcement, fire preparedness/prevention education, fire suppression, and hazardous material/emergency response. The project would not extend the service areas associated with AVFPD. The project includes a water supply for fire protection based on a well and static water storage. The existing well has capacity to provide a minimum fire protection water supply based on the type and square footage of the proposed buildings. Emergency access to and within the site is required to meet State Fire Safe Regulations and Mono County development standards. There would be no need for new or physically altered governmental facilities.

ii) *Police protection?*

Less than significant with mitigation. Cannabis cultivation may present an increased risk of criminal activities, such as theft of product. State Commercial Cannabis Regulations (Business and Professions Code 26013,26030) require video surveillance, professional alarm systems, and access control to areas of cannabis products. Mono County Code 5.60 and the Commercial Cannabis Development Standards (13.070 L) require review and approval of a security plan by the Sheriff's Office as a condition of the Cannabis Operations Permit. The indoor and outdoor cannabis cultivation areas are not located near public streets. Mitigation measure PS-1 would require review and approval of a security plan consistent with State law and County Code. With mitigation there would not be a substantial effect on police protection associated with implementing the project.

iii) *Schools?*

Less than significant. The project would result in an increase of employment opportunities in Antelope Valley, which may cause a minimal increase in the student population for local schools. Enrollment for Antelope Elementary and Coleville High are 130 and 72 students respectively and there is adequate capacity to serve projected enrollment. There would be a less than significant impact.

iv) *Parks?*

No Impact. The project would not provide any new structures that could result in a substantial increase in residents or employees or necessitate new or expanded park facilities. Therefore, there would be no impact.

v) *Other public facilities?*

No Impact. No other public facilities in the project area could be affected by implementation of the project.

4.15.1 Mitigation Measures

PS-1 Security Plan

Mono County shall require a site security plan which details measures to prohibit unauthorized access to commercial cannabis buildings and cultivation areas. The plan shall include proposed improvements and operations consistent with County Code 5.60.130 D including limited access areas, security lighting, video systems, and storage to prevent diversion, theft, and loss. The Mono County Sheriff's Office shall review and approve the security plan prior to issuance of the cannabis operation permit.

4.16 Recreation

Would the project:

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

Less than significant. The project would generate minimal new employment and new residents in Antelope Valley; however, the nearest developed recreation facilities are located at the Walker Community Park.

- 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?*

No impact. No recreation facilities are proposed as part of the project. The project would not cause the need to expand existing recreation facilities.

- c) *Is the project located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees)?*

No impact. The project is not located within a CSA or recreation and park district with Quimby fees.

4.16.1 Mitigation Measures

No mitigation measures are required.

4.17 Transportation

The project is accessed from Eastside Lane, a low volume, rural collector, and County maintained road. From Eastside Lane, an existing private road serves the project as a shared access with agricultural uses along the Highline Ditch to the north of the project site. This private road follows the California/Nevada border northwest from Eastside Lane. The road is unofficially called "Stateline Road" by users and is not named by Mono County. A section of Stateline Road crosses a separate private parcel owned by the proponent, APN 001-150-005, between the project site and Eastside Lane. The project site will not be open to the public due to access control and security measures to prevent unauthorized access.

US Highway 395 is the principal arterial route to and through Mono County and Antelope Valley. Highway 395 is a state route maintained by Caltrans, District 9. Within Antelope Valley, Highway 395 is

primarily a two-lane highway with limited passing lanes near Coleville. Highway 395 connects to local routes, Topaz Lane, Larson Lane, and Eastside Lane, which are the primary local roads in Antelope Valley.

Eastside Lane is a low volume, rural collector that connects northern Antelope Valley and Wellington Hills to Highway 395. Eastside Lane extends along the eastern edge of Antelope Valley from the intersection with Highway 395 in Walker and into Douglas County, Nevada. In addition to serving large lot residences, the road serves agricultural and open space recreation uses. The road is two lanes with asphalt surface from Topaz Lane to US 395. The surface is native material north from Topaz Lane. Topaz Lane provides the most direct access from the project site to Highway 395. Topaz Lane is a paved two-lane rural road from Highway 395 to Eastside Lane.

Eastside Lane and Topaz Lane are classified by the Mono County Regional Transportation Plan (RTP) as existing and planned Class II and Class III bicycle routes. Roads in Antelope Valley do not have sidewalks. Transit services are provided by Eastern Sierra Transit Authority (ESTA), a regional transit operator serving Mono and Inyo Counties. The ESTA operates a local Dial-A-Ride service for trips within Antelope Valley. Service is available along the Reno-Lone Pine route for trips along the 395-corridor including to Gardnerville and Bridgeport. The demand for transit services is within the capacity of the existing services. The project has access to rural roads and established bike routes which connect to transit in Coleville and Walker.

Would the project:

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

Less than significant. The project is located in remote Antelope Valley and would not require construction or redesign of the existing transportation network. The project would not conflict with any RTP or General Plan Circulation Element policies.

- b) *Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?*

Less than significant. On July 5, 2022, the Mono County Board of Supervisors adopted Ordinance 22-06 establishing Vehicle Miles Travelled (VMT) screening criteria and thresholds of significance for evaluation of VMT impacts in compliance with CEQA. The thresholds are consistent with State policy and guidance.

The project would generate trips associated with construction and operation. Temporary construction trips would include equipment and material hauling and worker trips. The project would employ eight full-time employees and up to 16 part-time seasonal employees at build-out. This analysis assumes trips based on peak seasonal employment during periodic indoor and seasonal outdoor harvesting and processing; employees would not live onsite and would commute to work each day. The proposed project is estimated to generate up to 100 vehicle/truck trips per day.

- 96 employee vehicle trips (estimate of four trips per day per employee; two trips for commuting to work, and two trips during lunch hour),
- Two trips for the import of agricultural materials and supplies needed for the cultivation operation (1 in/1 out), and

- Two trips for the export of unprocessed cannabis plants/flower (1 in/1 out).

Employees are presumed to be from the local Mono County population and would not cause significant additional traffic in the area or vehicle miles traveled (VMT). The estimated vehicle trips from the proposed project are not anticipated to cause a significant increase in traffic or require changes to any roadways, public transit, or pedestrian/bicycle facilities.

The estimated vehicle trips assume that all employees commute to the project site. The agriculture land use designation allows single family dwellings and farm worker housing as allowed use by right. These uses are allowed but not proposed as part of the project. No reductions were made to trip generation analysis or VMT for employees residing at the project property in primary or accessory dwelling units or farm labor housing as allowed by the General Plan.

The project trip generation of 100 daily trip ends is less than the county adopted screening criteria for Small Projects of 237 daily unadjusted trip ends. Per Mono County Ordinance 22-06, the increase in VMT of the project would be less than significant.

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

Less than significant. The project does not require construction of new road facilities. The driveway intersection with Eastside Lane has gentle slopes and adequate site distance and would not cause a substantial increase in hazards due to the design. An encroachment permit is required for any improvements to Eastside Lane to confirm that the access driveway meets engineering design standards. Access to the site is designed for turnaround and turnout improvements to meet County Development Standards and CalFire Fire Safe Regulations for emergency evacuation.

- d) *Result in inadequate emergency access?*

Less than significant. Emergency access to the property is along private "Stateline Road" from Eastside Lane. The length of the access from Eastside Lane to the proposed project site is approximately 2,900 feet. The existing access is a single lane of 12-18 feet wide. There is adequate area available for access improvements, CalFire Fire Safe Regulations and Mono County General Plan Development Standards that require improvements to and prescribe design standards for emergency access. The project site plan proposes a 48-foot outside diameter emergency access turnaround and turnouts every 400 feet consistent with requirements.

4.17.1 Mitigation Measures

No mitigation measures are required.

4.18 Tribal Cultural Resources

Would the project:

- a) *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place,*

cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or*
- ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision I of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision(c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?*

Less than significant with mitigation. AB 52 was enacted on July 1, 2015 and establishes that “a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment” (Public Resources Code Section 21084.2). It further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource when feasible (PRC Section 21084.3).

Public Resources Code Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as “sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe” and meets either of the following criteria:

- Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 also establishes a formal consultation process for California cities, counties, and tribes regarding tribal cultural resources. Under AB 52, lead agencies are required to “begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project.” Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency. As a lead agency, Mono County provided notice to Native American tribes and contacted the California Native American Heritage Commission consistent with General Plan Action 22.A.5.b.

Action 22.A.5.b. Implement procedures for consulting with local Native American groups and with the California Native American Heritage Commission to ensure that federal and state requirements concerning the preservation and protection of Native American remains are met. Integrate consultation procedures with CEQA requirements.

The purpose of the consultation is to determine whether a proposed project may result in a significant impact to tribal cultural resources that may be undocumented or known only to the tribe and its members. As set forth in Public Resources Code Section 21080.3.1(b), the law requires:

“Prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project, the lead agency shall begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project if: (1) the California Native American tribe requested to the lead agency, in writing, to be informed by the lead agency through formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with the tribe, and (2) the California Native American tribe responds, in writing, within 30 days of receipt of the formal notification, and requests the consultation.”

The project area is located within the ancestral territory of the Washoe Tribe of Nevada and California, and Kutzadika Tribes. The project site has historical use for livestock grazing, road access for agriculture and irrigation. Other non-historical cultural uses may have occurred at the project site and in the surrounding vicinity. The project site is vacant except the existing well, septic system, and portable water tanks.

A Cultural Resources Assessment was prepared by Great Basin Consulting Group, LLC that included literature and Sacred Lands File searches as well as an intensive-level pedestrian survey over 18 acres encompassing the project site.

The report notes that no cultural resources have been previously recorded within the project area. The survey discovered one artifact, a horseshoe, which is determined not to be a significant resource. The report concludes that no newly identified prehistoric or historic-era resources were documented during the pedestrian survey (Great Basin Consulting Group, 2022).

Tribal consultation pursuant to AB 52 was initiated on April 19, 2022, with the Washoe Tribe of Nevada and California and Kutzadika tribes. No responses were received from these entities requesting initiation of consultation under the provisions of AB 52. Results from the pedestrian survey and associated record search did not identify any prehistoric or historic archaeological sites, ethnographic sites, or historic era-built environment resources on the project site (Great Basin Group, 2022).

However, there remains the possibility that tribal cultural resources could exist in the area and may be uncovered during project development. To prevent potential impacts to unknown tribal cultural resources at the project site, an inadvertent discovery protocol is included as Mitigation Measures CR-1 and CR-2 (see Section 4.5 – Cultural Resources). With the proposed mitigation measure, the project will not cause a substantial adverse change in the significance of a tribal cultural resource. Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated.

4.18.2 Mitigation Measures

Tribal cultural resources mitigation measures are the same as Cultural Resources mitigation measures (Section 4.15).

CR-1 Discovery of Cultural and Tribal Resources
CR-2 Discovery of Human Remains

4.19 Utilities and Service Systems

Available public utilities and services are limited to serve the project area due to the remote location. Existing systems include a well installed in 2021 to provide water for domestic and fire protection. A septic system with a 1,500-gallon holding tank and 190' of leach line is permitted and partially installed to serve the first indoor cultivation building, lab, and shop. A second septic system is permitted by the Mono County Health Department and may be installed to serve subsequent phases of the project. During the first two phases of the project electrical power will be provided on-site by propane generators.

Water

Water supplies are from an onsite well. The well was constructed in 2022 and can produce 100 gallons per minute. Well water is to be pumped to the tank house and storage tanks on the east side of the project site. From the tank house, water lines will distribute water to buildings and the outdoor cannabis cultivation area.

The project is located in the Antelope Valley Groundwater Basin, which is prioritized as Very Low by the California Department of Water Resources. No groundwater management plan exists for the project area and sufficient groundwater supplies are available to serve the project.

Wastewater

The installed and proposed on-site wastewater treatment systems are sited, designed, or permitted in accordance with Mono County Health Department and Lahontan Regional Water Quality Control Board (LRWQCB) requirements. There are no impacts to community wastewater systems.

Solid Waste

Mono County Public Works provides solid waste services at county landfills. The project is located 4.5 miles from the Walker Landfill and Transfer Station. There are no solid waste hauling services available in Antelope Valley and the project would transport solid waste to the Walker Landfill and Transfer Station. The facility provides for disposal of construction and demolition waste, household waste, recycling, green waste, and electronic waste. There is adequate capacity available at the Walker Landfill of greater than 15 years (Preliminary Closure and Post closure Maintenance Plan for the Walker Landfill, 2002).

The project's waste generation will be composed of agricultural refuse and cannabis waste. The solid waste will be transported to Walker Landfill for disposal. Vegetative materials will be composted on-site in accordance with DCC regulations CCR 17223.

Utilities

Liberty Utilities provides electrical power service to Antelope Valley. The project would provide electrical power by on-site propane generators as part of Phases 1 and 2. Phase 3 includes construction of above-ground utilities on and off site to connect to Liberty Utilities. The nearest connection to the Liberty Utilities grid is approximately 1.6 miles from the project site at the intersection of Eastside Lane and Topaz Lane.

There are telecommunications services available from Frontier and local internet service providers. Communications are proposed to be collocated with the proposed power installation connecting to Liberty Utilities with project Phase 3.

Would the project:

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

Less than significant impact. The project will result in the construction of a new groundwater well (obtained November 16, 2021) and new on-site septic system (obtained February 11, 2022) as permitted by the Mono County Health Department.

During Phases 1 and 2, the project electricity will be supplied by propane generators as there are no natural gas connections. If feasible, the project may connect to Liberty Utilities via 1.6 miles of overhead line located along the road shoulder in Phase 3. The route of inter connection would run north along Eastside Lane from the intersection of Topaz Lane to the subject property.

Mono County General Plan Development Standards Chapter 11 prohibits placement of new above ground utilities generally except that individual development may be granted a use permit to install overhead utility lines. As part of the use permit for the project, the requested to install overhead utility lines in accordance with 11.010 D will be presented. To approve the use permit for overhead utility lines the project must meet one of four findings in addition to standard use permit findings.

Included in these findings is the exclusive purpose of the overhead utility line is to serve an agricultural operation and the placement will not significantly disrupt the visual character of the area. The commercial cannabis use is an allowed agricultural use with a permit in the AG land use designation. Extending overhead utility lines within the AG land use designation is consistent with the finding that the utility serves agricultural use exclusively. The proposed location of the overhead utility line is the most reasonable route to connect to the existing electrical power distribution system at the intersection of Topaz Lane and Eastside Lane. Power and telecommunications would be co-located on the proposed poles to reduce overall overhead poles and lines. There is no feasible alternative siting of the utility to serve the project due to distance to distribution and lack of utility easements across private property to the west.

The generally flat topography and low upland shrubs would not provide visual screening of new overhead utilities. The proposed 1.6 miles of new overhead utility lines would be installed along rural roads and agricultural land in the vicinity of Topaz Lane where overhead utility lines currently exist and do not disrupt the visual character of open space and agricultural uses. The portion of the new utility that would be immediately visible within the East Side Lane right-of-way is approximately 0.8 miles. The final 0.8 miles of new utility would be located on the project property separated from East Side Lane between 600-2,400 feet reducing the visibility of the overhead utility from the road.

- b) *The proposed project is consistent with the purpose and findings of Development Standards Chapter 11 policies to reduce significant environmental impacts of new overhead utility lines.*

The proposed new overhead utility line would have a less than significant impact to aesthetics. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Less than significant impact. Water supplies are from an onsite well. The well was constructed in 2022 and can produce 100 gallons per minute (144,000 gallons per day). Well water is to be pumped to the tank house and storage tanks on the east side of the project site. From the tank house, water lines will distribute water to buildings and the outdoor cannabis cultivation area.

Year-round indoor cultivation will use less than 2,600 gallons per day at maximum operations. Outdoor cultivation utilizes raised beds with mulch-covered drip tapes to maximize water usage by avoiding runoff and minimizing evaporation. Outdoor seasonal demand will be kept to 4,000 gallons per acre per day. These amounts constitute approximately 5% of the available water from the existing well/pump the total water use of the project is estimated by the applicant to be 2.6 acre\feet per year (Sierra High CUP application, 2021).

The Antelope Valley Groundwater Basin is identified as the by the California Department of Water Resources. The estimated total of groundwater recharge for the Antelope Valley was between 15,600 AF and 22,800 AF per the 2014 Feasibility Assessment of a Water Transactions Program in the Walker River Basin (Carroll and Pohll 2013). There is sufficient groundwater supplies in the Antelope Valley to serve the project.

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

No impact. Wastewater treatment will occur on-site. The project will not impact service commitments of the local wastewater treatment provider.

- 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?*

Less than significant impact. There are no solid waste hauling services available in Antelope Valley and the project would transport solid waste to the Walker Landfill and Transfer Station. The facility provides for disposal of construction and demolition waste, household waste, recycling, green waste, and electronic waste. Based on the Preliminary Closure and Post Closure Maintenance Plan for the Walker Landfill (2002), there is adequate capacity available at the Walker Landfill of greater than 15 years.

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

Less than significant impact. The project will not violate any federal, State, and local statutes and regulations related to utilizes or public services for water, wastewater, electrical power, and solid waste, and a less than significant impact would occur. The project will comply with state and local solid waste regulations and not generate excess waste, a less than significant impact.

4.19.1 Mitigation Measures

No mitigation measures are required.

4.20 Wildfire

The project site is dominated by uniform upland shrubs. The proposed project is near the Moderate fire hazard severity zone as determined by the CalFire Fire Hazard Severity mapping. In 2020, the Mountain View fire burned 20,375 acres, and destroyed or damaged 100 dwellings along Eastside Lane near Walker.

CalFire Fire Hazard Severity Zone (FHSZ) maps classify wildfire hazards for state responsibility area (SRAs). The most recent FHSZ map for Mono County of 2007 identifies the project property as within a Local Responsibility Area (LRA) and not classified for hazard per the FHSZ. The project is adjacent to continuous irrigated pasture lands to the west. FHSZ mapping typically removes agricultural land from classification due to low risk. However, the project site is not flood irrigated and risk classification should reflect hazards of brush fuels that exist on the project site. For property near the project with similar attributes, the FHSZ classification is Moderate.

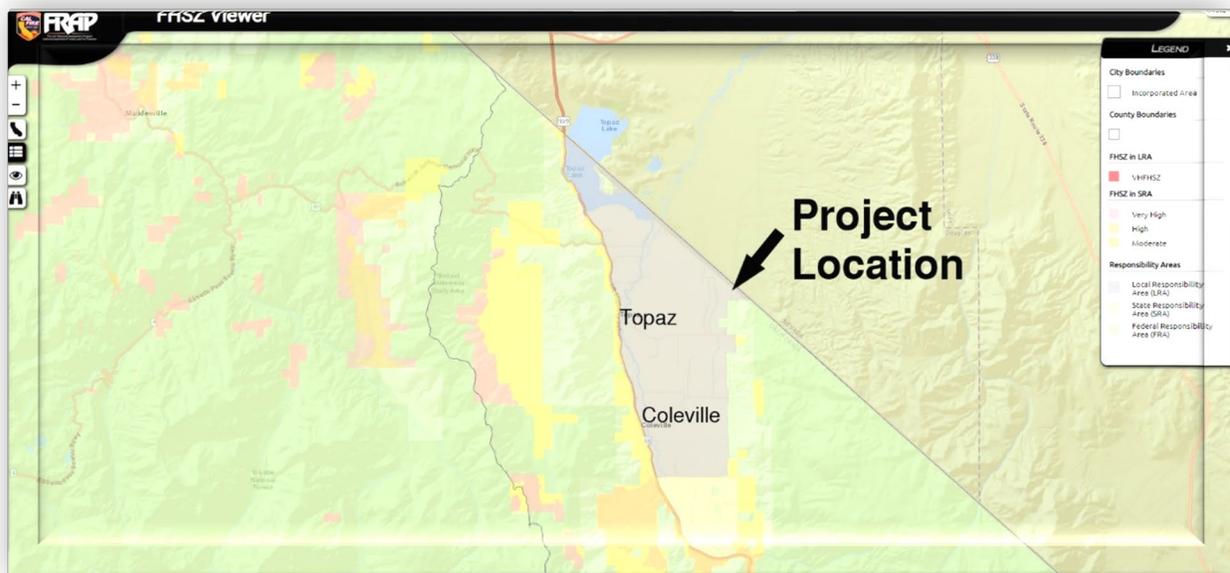


Figure 4-2. FHSZ Map for Project Vicinity

Mono County Community Wildfire Protection Plan (CWPP) is a community specific analysis of wildfire risk and mitigations. The CWPP recommends individual parcel analysis for new development in the Antelope Valley-East Valley area. The project site is bounded by irrigated agriculture to the south and west, the direction of prevailing winds. The irrigated agriculture reduces risk of wildfire spread to the project site. The Highline Ditch and access road is a continuous fuel break along the west boundary of the project site. Project site fuels are moderate risk grasses and shrubs. Existing continuous fuels in the project area will be reduced and fragmented by required defensible space around buildings, the outdoor cultivation area, and by road widening for turnarounds and turnouts.

Would the project:

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

Less than significant. The Mono County Emergency Operations Plan (EOP) of 2012 identifies US Highway 395 as a primary evacuation route. The project has access to US Highway 395 via Eastside Lane and Topaz Lane. The travel distance from the project site to US Highway 395 is 5.2 miles. The proposed project would not impair emergency evacuation capabilities of local routes or US Highway 395.

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

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

Less than significant with mitigation. Per Mono County Land Development Regulations Chapter 22 and California Fire Safe Regulations, the existing private road and driveway will be required to be improved with an emergency vehicle turnaround and turnouts interspersed every 400 feet for the 2900 feet from Eastside Lane. The proposed access improvements would not exacerbate risk from wildfire.

New above-ground electrical utilities would be installed along the west and south property boundary and off-site along Eastside Lane. The vegetation along the proposed utility alignment is similar to the project with moderate big sagebrush fuels. California Public Resources Code Section 4292 requires removal of flammable vegetation within a 10' radius of power poles. New utility poles are required to have minimum ground clearances based on electrical codes.

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

Less than significant. There are no major water courses draining to the subject property and improvements are sited away from minor natural drainages.

4.20.1 Mitigation Measures

WF-1 Fire Safe Regulations

Mono County shall require site improvements for access consistent with CalFire Fire Safe Regulations and Mono County General Plan Development Standards Section. Prior to issuance of a building permit the applicant shall submit site improvement plans which describe minimum emergency access, firewater storage and supply, and defensible space in accordance with PRC 4290 and 4291.

WF-2 Overhead Utility Vegetation Management

Mono County shall require a vegetation management plan for proposed new overhead utilities corridors and new utility poles consistent with PRC 4292 and 4293, Public Utilities Commission General Order 95, and Liberty Utilities Wildfire Mitigation Plan. The applicant shall maintain vegetation to the standard of the vegetation management plan.

4.21 Mandatory Findings of Significance

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

Would the project:

- 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, 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?*

FINDING: As concluded in the Air Quality, Biological, Cultural Resources, Tribal Cultural Resources, and Water Quality sections of this document, the proposed project would result in no impacts or less than significant impacts with mitigation to these resources. The project is compatible with the Mono County General Plan land use designation and its surroundings. Evaluation of the proposed project in this document (Section 4.4 – Biological Resources) has shown that the activities of the proposed project, as mitigated, do not have the potential to degrade the quality of the environment and will not substantially reduce the habitat or cause wildlife populations to drop below self-sustaining levels. Less than significant Impacts with mitigation is expected.

Also, based on the discussion and findings in Section 4.5 – 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. Although no archaeological deposits or features were found during the Cultural Resources study, 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) *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)?*

Following the adoption of commercial cannabis General Plan policies and enabling ordinance Mono County has approved two cannabis cultivation use and operation permits within Antelope Valley. The nearest cannabis cultivation uses to the proposed project are located in Walker, California approximately six (6) miles from the project. There is a less than significant cumulative impact of cannabis cultivation uses because of the distance between the proposed project and existing cannabis cultivation uses. There are no other current or foreseeable development projects in the vicinity to the proposed project which could cause cumulative impacts

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

As discussed in the various sections throughout this Initial Study, the proposed project would not include a land use that could result in substantial adverse effects on human beings. Mono County General Plan has established regulations for commercial cannabis cultivation to ensure the use does not conflict with the General Plan, its surrounding uses, or become detrimental to the public's health, safety, and welfare. The County's review and permitting process of cannabis facilities and facility operations will

ensure that the regulations are fully implemented. Based upon the findings provided in this document, and mitigation measures and standard conditions incorporated into the project, less than significant impacts are expected.

Section 5. Mitigation Monitoring and Reporting Plan

The project will be subject to further codes and regulations, most significantly, Mono County Cannabis Operations permit conditions, Department of Cannabis control license requirements, and the California Building Standards Code. If the project is approved, compliance with these regulatory requirements will be mandatory. All relevant regulatory requirements are not included with the MMRP. The project shall fully comply with the eight (8) mitigation measures proposed to reduce potentially significant impacts. Mono County Community Development Department would be responsible for monitoring and confirming completion of mitigations.

Mitigation Monitoring and Reporting Plan			
Mitigation Measure	Mitigation Monitoring		
	Monitoring Schedule	Responsible Party	Monitoring Procedure
Aesthetics			
<p>AES-1. Require Lighting Plans</p> <p>The Mono County Community Development Department shall confirm that project lighting meets the requirements of County Code Chapter 23 – Dark Sky Regulations. The applicant shall submit plans for lighting describing the location and details of proposed fixtures with building permit application or prior to installation of outdoor lighting.</p>	Prior to the issuance of grading, building permits	Applicant, Mono County Community Development Department	Verified upon building inspection
Air Quality			
<p>AQ-1. Post signs and report odor nuisance complaints.</p> <p>The applicant shall post signs at the property line that provide a 24-hour project contact phone number in the case of nuisance odors. The applicant shall report any complaints of nuisance odors to the County within 72 hours of the complaint.</p>	Prior to the issuance of grading, building permits	Applicant, Mono County Community Development Department	Verified upon site inspection
Biology			
<p>BIO-3. Nesting Bird Survey</p> <p>The project applicant would implement the following practices for protection of bird species with the potential to nest within the project area.</p> <ul style="list-style-type: none"> Pre-project surveys for nesting birds and raptors will be conducted in suitable nesting habitat within 500 feet of vegetation removal, construction, and development activities, and will be reviewed and accepted by the Mono County Community Development Department prior to site disturbance or construction activity. Determination of habitat suitability, and whether a pre-project survey is required should be based on a reconnaissance field assessment of habitat conditions before initiating projects in these areas <p>Survey Timing: March 1 to August 31</p> <ul style="list-style-type: none"> If an active bird nest is located during the pre-project surveys, the project proponent will notify Mono County and the CDFW. To avoid disturbances to or loss of active nest sites, between March 1 and August 31, project activities would be delayed within 0.25 mile of (or at a distance directed by the appropriate regulatory agency) the nest to avoid disturbance until the nest is no longer active. Project activities include vegetation removal, earth moving, and construction. The 0.25-mile buffer may be reduced through consultation with Mono County and/or the CDFW Biologist. 	Prior to the issuance of grading, building permits	Mono County Community Development Department	Surveys shall be submitted to the Mono County Community Development Department upon completion.

Mitigation Monitoring and Reporting Plan			
Mitigation Measure	Mitigation Monitoring		
	Monitoring Schedule	Responsible Party	Monitoring Procedure
<p>BIO-4. Preconstruction Weed Survey</p> <p>Weed Survey Prior to construction, the entire project area, including 50 feet on either side of the project alignment centerline and all designated equipment staging areas, would be surveyed for noxious weeds. All occurrences of noxious weeds would be flagged and avoided.</p>	Use of heavy equipment, grading, demolition, construction	Applicant	Surveys shall be submitted to the Mono County Community Development Department upon completion.
<p>BIO-5. Weed Free Certification</p> <p>Straw, mulch, or gravels used for erosion control shall be certified weed-free.</p>	Prior to issuance of grading, building permits	Applicant	
<p>BIO-6. Jurisdictional Waters</p> <p>The proposed project may require a CWA Section 404 and 401 permit issued by the U.S. Army Corps of Engineers and Lahontan RWQCB, respectively, and a Lake and Streambed Agreement from the CDFW for impacts to regulated waters. The project would adhere to all impact avoidance, impact minimization, and/or compensatory mitigation specified within the permit conditions. Copies of the final permits and evidence of compliance with required mitigation shall be provided to Mono County Community Development Department prior to grading activities for the proposed project.</p>	Prior to issuance of grading permits	Applicant	Permits and or evidence shall be submitted to the Mono County Community Development Department upon completion.
<p>Cultural and Tribal Resources</p>			
<p>CR-1. Discovery of Cultural or Tribal Resources</p> <p>If any prehistoric or historic-period subsurface archaeological features or deposits are discovered during construction, all ground-disturbing activity within 25 feet of the resources shall be halted, and a qualified professional archaeologist and/or Tribal representative shall be retained to assess the significance of the find. If the find is determined to be significant by the qualified archaeologist (i.e., because it is determined to constitute either a historical resource or a unique archaeological resource), or Tribal representative, a plan shall be prepared to address the appropriate procedures to protect the integrity of the resource and ensure that no additional resources are affected. Procedures could include but would not necessarily be limited to preservation in place, archival research, subsurface testing, or contiguous block unit excavation and data recovery.</p>	Ongoing during subsurface construction	Applicant	

Mitigation Monitoring and Reporting Plan			
Mitigation Measure	Mitigation Monitoring		
	Monitoring Schedule	Responsible Party	Monitoring Procedure
<p>CR-2. Unanticipated Discovery of Human Remains</p> <p>If human remains are encountered during construction, all ground disturbance activities within 150 feet of the discovery shall be suspended and the construction manager shall immediately notify the County coroner. If the human remains are determined to be of Native American descent, the coroner shall notify the Native American Heritage Commission (NAHC) within 24 hours of identification. The NAHC shall identify and immediately notify the Most Likely Descendant (MLD) of the deceased Native American. Within 48 hours of being granted access to the site, the MLD shall complete the inspection of the site of the discovery and make recommendations to the Applicant/landowner for the treatment or disposition of the human remains and any associated funerary objects. All measures, as required by the County, shall be implemented under the supervision of the MLD and/or tribal representative.</p>	Ongoing during subsurface construction	Applicant	
<p>Public Services</p>			
<p>PS-1 Security Plan</p> <p>Mono County shall require a site security plan which details measures to prohibit unauthorized access to commercial cannabis buildings and cultivation areas. The plan shall include proposed improvements and operations consistent with County Code 5.60.130 D including limited access areas, security lighting, video systems, and storage to prevent diversion, theft, and loss. The Mono County Sheriff’s Office shall review and approve the security plan prior to issuance of the cannabis operation permit.</p>	Prior to issuance of commercial cannabis operation permit	Applicant, Mono County Sheriff’s Office, Mono County Community Development Department	Review security plan
<p>Water Quality</p>			
<p>WQ-1. Reseeding of Disturbed Areas</p> <p>Directly following construction, disturbed areas shall be reseeded with a certified weed-free seed mix comprised of locally sourced native plant materials. Seeded areas shall be watered as needed until fully established.</p>	Prior to issuance of certificate of occupancy for associated buildings	Applicant, Mono County Community Development Department	Verify establishment following construction

Mitigation Monitoring and Reporting Plan			
Mitigation Measure	Mitigation Monitoring		
	Monitoring Schedule	Responsible Party	Monitoring Procedure
Wildfire			
<p>WF-1 Fire Safe Regulations</p> <p>Mono County shall require site improvements for access consistent with CalFire Fire Safe Regulations and Mono County General Plan Development Standards Section. Prior to issuance of a building permit the applicant shall submit site improvement plans which describe minimum emergency access, firewater storage and supply, and defensible space in accordance with PRC 4290 and 4291.</p>	Prior to issuance of certificate of occupancy for associated buildings	Applicant, Mono County Community Development Department	Review plans and confirm during inspection
<p>WF-2 Overhead Utility Vegetation Management</p> <p>Mono County shall require a vegetation management plan for proposed new overhead utilities corridors and new utility poles consistent with PRC 4292 and 4293, Public Utilities Commission General Order 95, and Liberty Utilities Wildfire Mitigation Plan. The applicant shall maintain vegetation to the standard of the vegetation management plan.</p>	Prior to construction of overhead utilities	Applicant, Mono County Community Development Department	Review vegetation management plan

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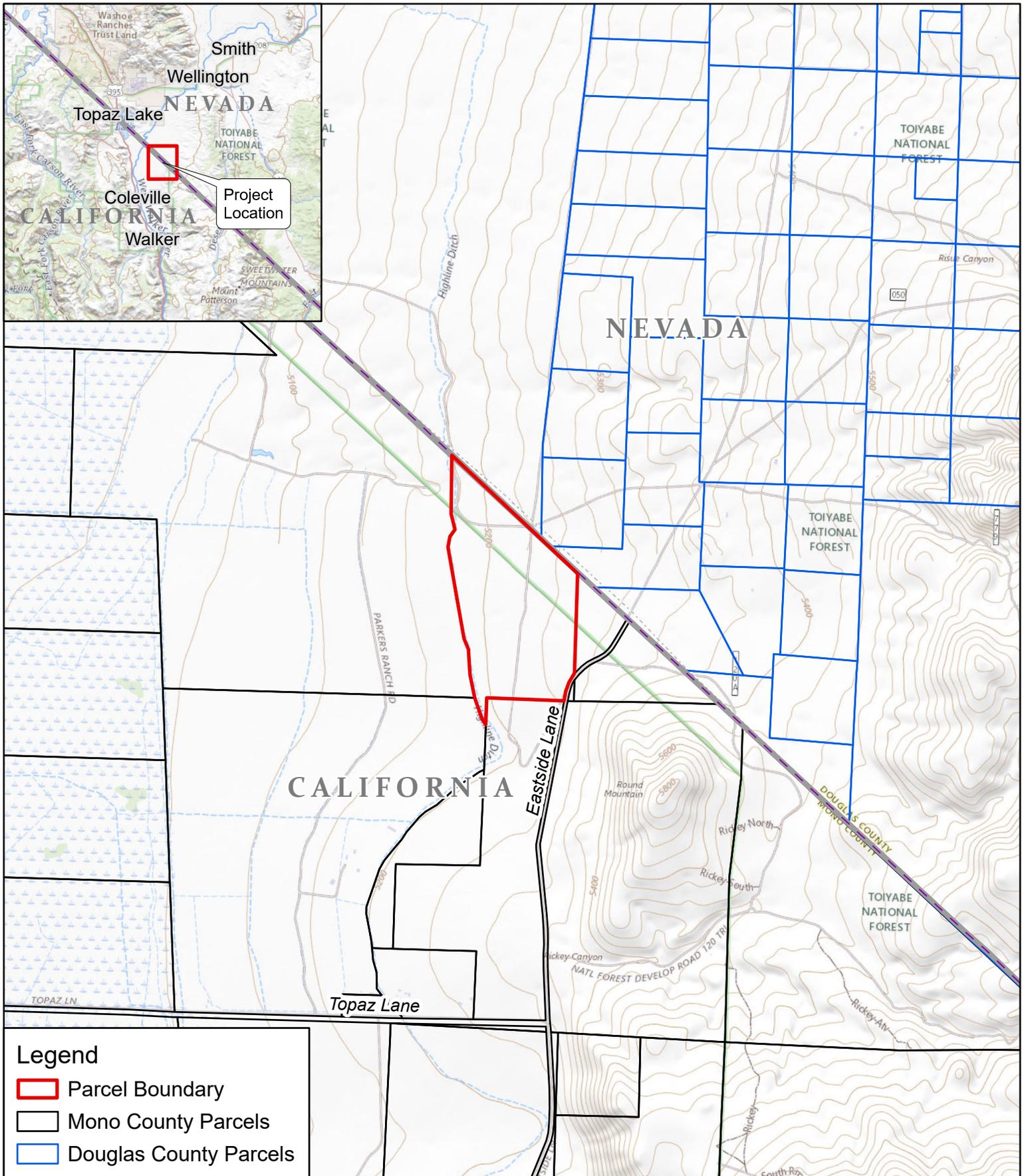
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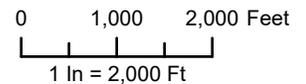
Appendix A

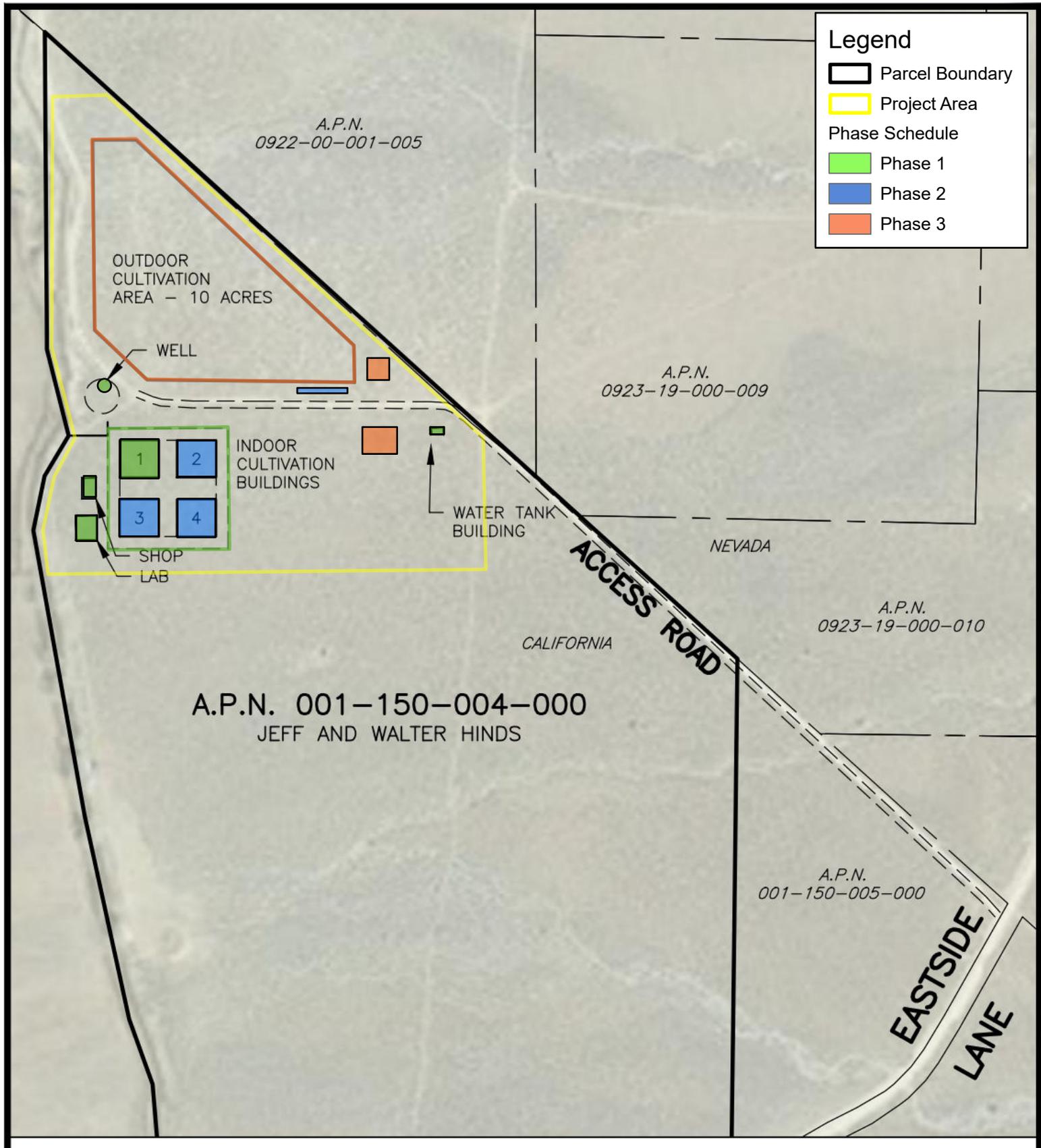
Figures



Project:
 County:
 Surveyor: JoAnne Michael
 Date:
 Source: USGS The National Map, 2021

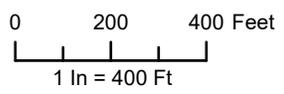
Figure 1
 Sierra High Farms - Use Permit
 Location Map



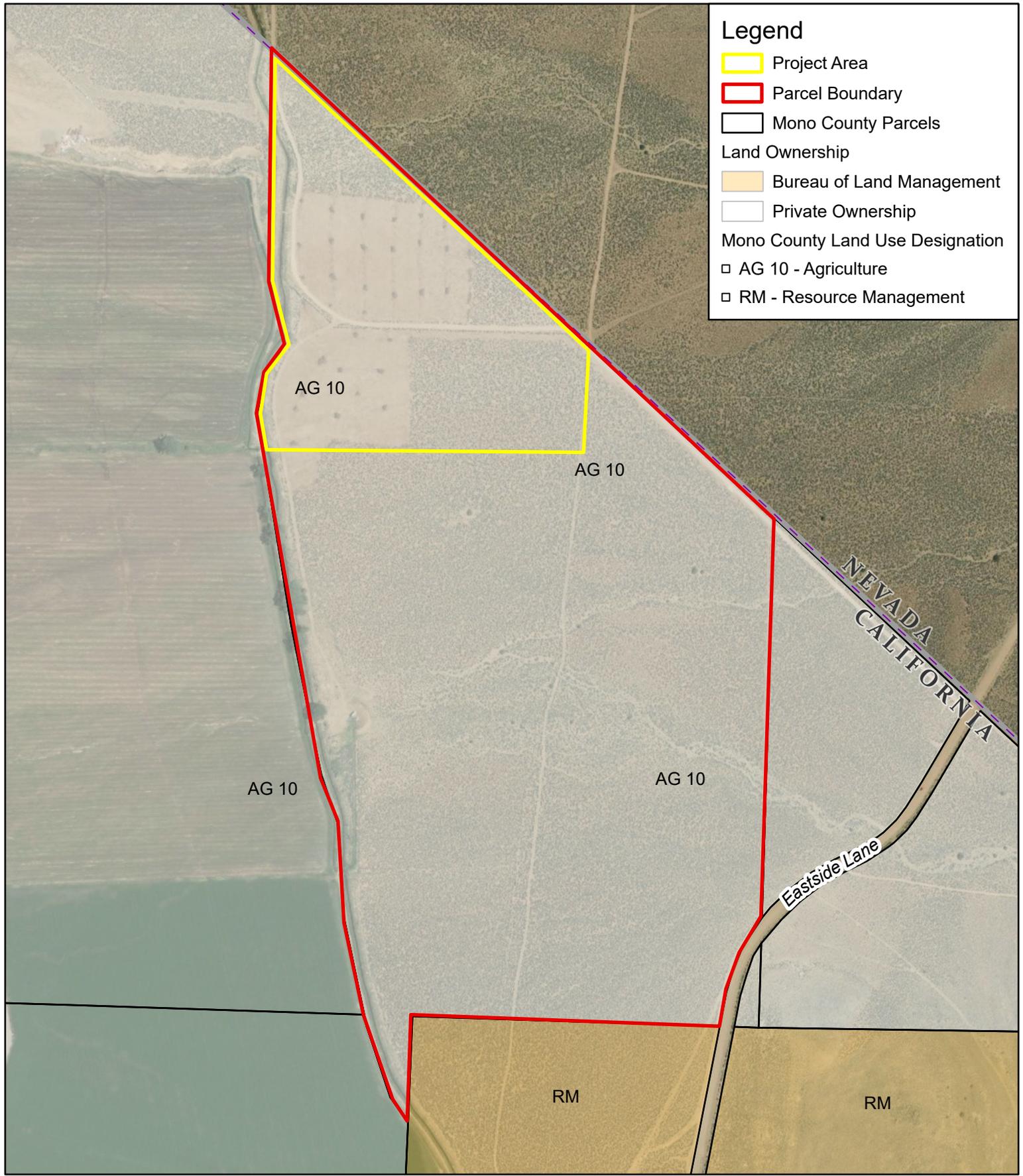


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 Date: 6/20/2022
 Source: ESRI Imagery Services
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Figure 2
 Sierra High Farms - Use Permit
 Site Plan

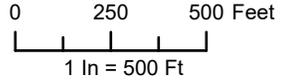


*Project Area footprint is within the Parcel Boundary.

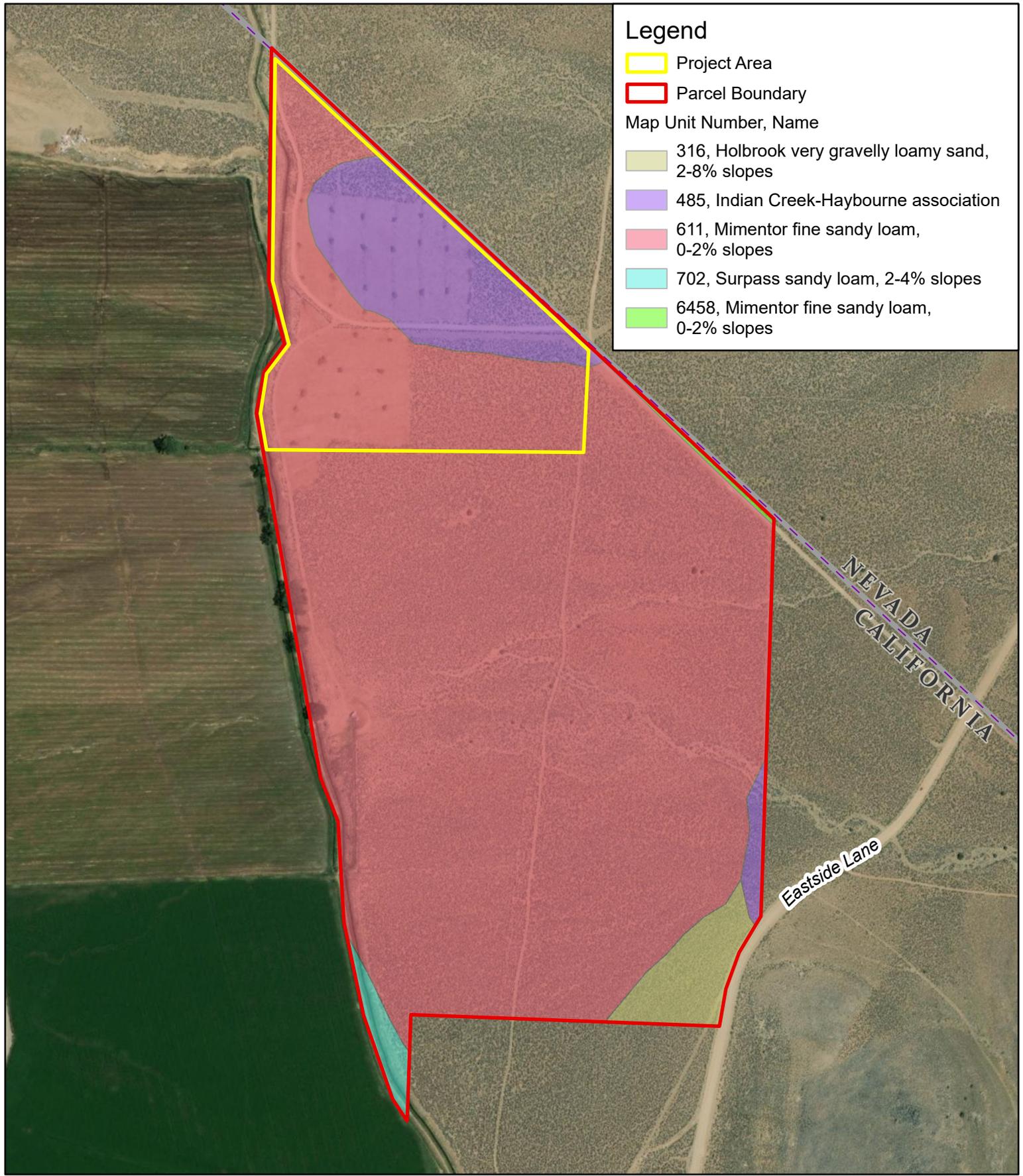


County: Mono County, CA
 Date: 6/20/2022
 Source: Mono County LUD Data, 2019

Figure 3
 Sierra High Farms - Use Permit
 Land Use Map



*Project Area footprint is within the
 Parcel Boundary.



Legend

Project Area

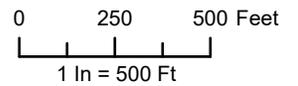
Parcel Boundary

Map Unit Number, Name

- 316, Holbrook very gravelly loamy sand, 2-8% slopes
- 485, Indian Creek-Haybourne association
- 611, Mimentor fine sandy loam, 0-2% slopes
- 702, Surpass sandy loam, 2-4% slopes
- 6458, Mimentor fine sandy loam, 0-2% slopes

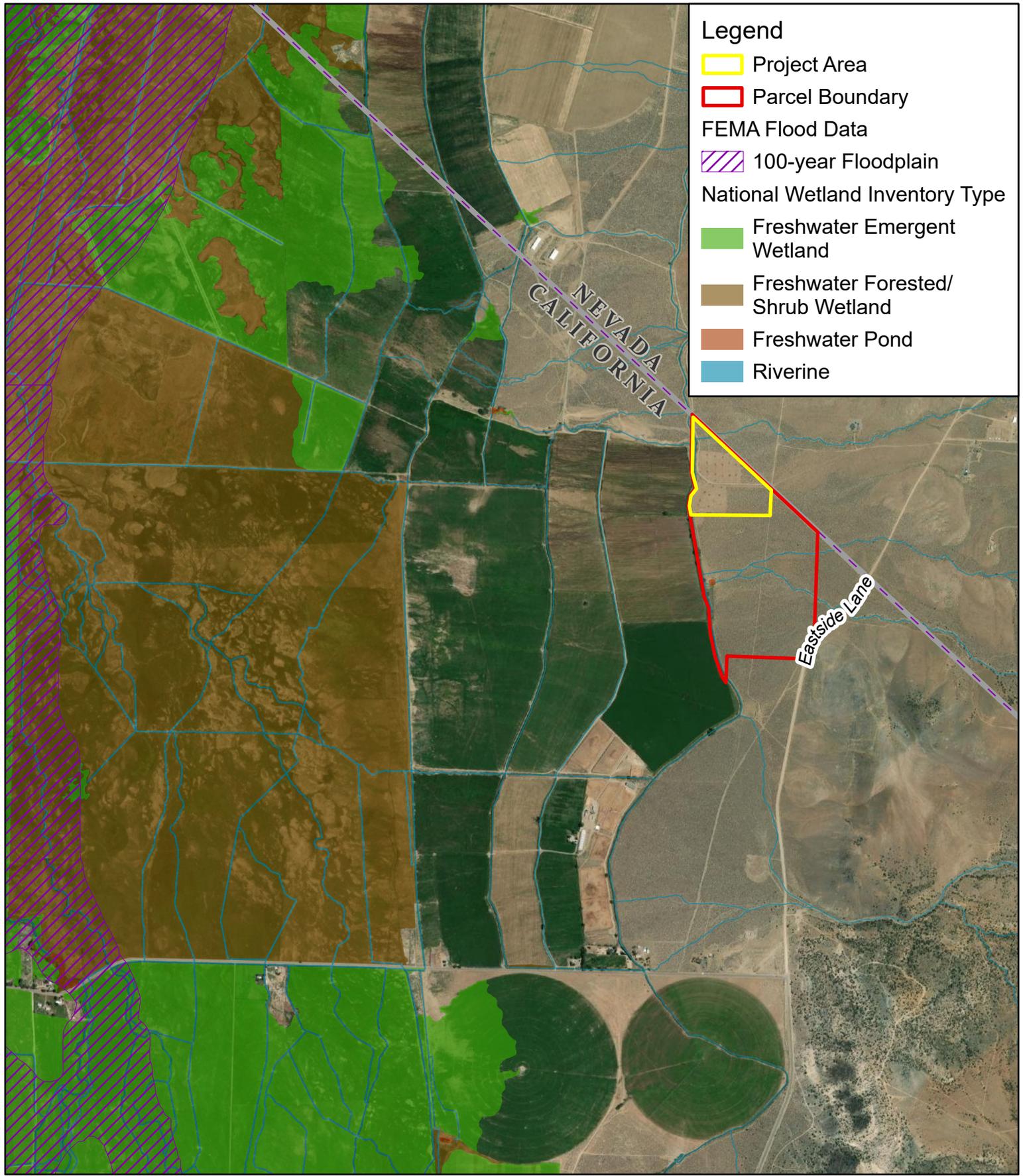
County: Mono County, CA
 Date: 6/20/2022
 Source: Web Soil Survey, 2021

Figure 4
 Sierra High Farms - Use Permit
 Web Soil Survey



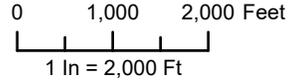
*Project Area footprint is within the Parcel Boundary.

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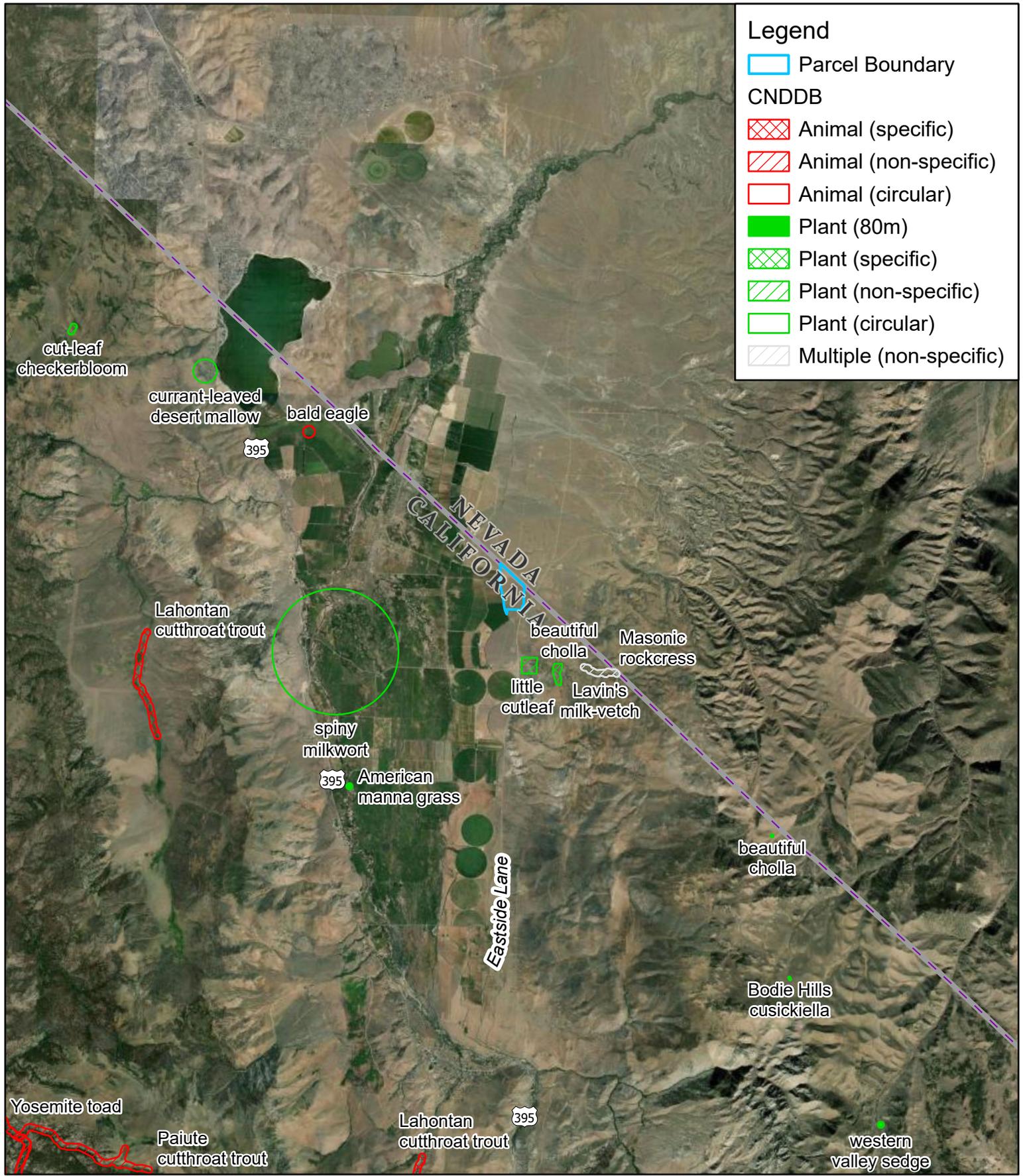


County: Mono County, CA
 Date: 6/20/2022
 Source: National Wetland Inventory, 2021

Figure 5
Sierra High Farms - Use Permit
National Wetland Inventory



*Project Area footprint is within the Parcel Boundary.



Legend

- Parcel Boundary
- CNDDDB**
- Animal (specific)
- Animal (non-specific)
- Animal (circular)
- Plant (80m)
- Plant (specific)
- Plant (non-specific)
- Plant (circular)
- Multiple (non-specific)

Project:
 County:
 Surveyor: JoAnne Michael
 Date:
 Source: CNDDDB June, 2022

Figure 6
 Sierra High Farms - Use Permit
 California Natural Diversity Database Map



Appendix B

Biological Technical Report

September 30, 2022

Biological Technical Report

for –

Sierra High Farms

Prepared For:

Mono County
Community Development Department
PO Box 347
Mammoth Lakes, CA 93546

Prepared By:



Resource Concepts, Inc.
340 N. Minnesota Street
Carson City, NV 89703-4152

September 30, 2022

Biological Technical Report

for –

Sierra High Farms

(RCI # 21-627.1)

Prepared For:

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Attachments

Attachment A. Biological Data

Summary of Acronyms

ACOE	Army Corps of Engineers
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CNDDDB	California Natural Diversity Database
CWA	Clean Water Act
DPS	Distinct Population Segment
EIR	Environmental Impact Report
ESA	Endangered Species Act
LCT	Lahontan Cutthroat Trout
LRWQCB	Lahontan Regional Water Quality Control Board
MBTA	Migratory Bird Treaty Act
NPDES	National Pollution Discharge Elimination System
NPPA	California Native Plant Protection Act
SNYLF	Sierra Nevada Yellow Legged Frog
SWPPP	Stormwater Pollution Prevention Plan
USFWS	U.S. Fish & Wildlife Service

File doc: 2022-09-30 Final Appx-B Rpt SHF Bio Tech Rpt 21-627.1 MC JRM-ca-jm L7-2.docx

1.0 Introduction

1.1 Introduction

At the request of Sierra High Farms, Resource Concepts, Inc (RCI) conducted a biological assessment within the proposed Sierra High Project Area. This report evaluates the potential impacts from the project to special status wildlife, vegetation, vegetation communities, and jurisdictional waters and will be used to complete the environmental impact review pursuant to the California Environmental Quality Act (CEQA).

1.2 Project Location

The 15- acre Project Area is located approximately 4.25 miles east of Coleville, Mono County, within the western edge of Antelope Valley on a 123-acre parcel (APN 001-150-004-000). The Project Area is bordered by the Nevada state line along its northeast boundary and Highland Ditch along its western. US Highway 395 is located three miles to the west. Reference Figure 1.

1.3 Project Description

Sierra High Farms is proposing a ten (10) acre outdoor and 24,000 square-foot (SF) indoor commercial greenhouse cannabis cultivation operation. The project is located within a 123-acre parcel (APN 001-150-004-000) that is owned by the project proponent. The General Plan land use designation of the parcel is Agriculture (AG) with a 10-acre parcel size minimum. The Location Map (Figure 1) and Site Plan (Figure 2) are provided in Attachment A.

1.3.1 Proposed Building and Ancillary Structures

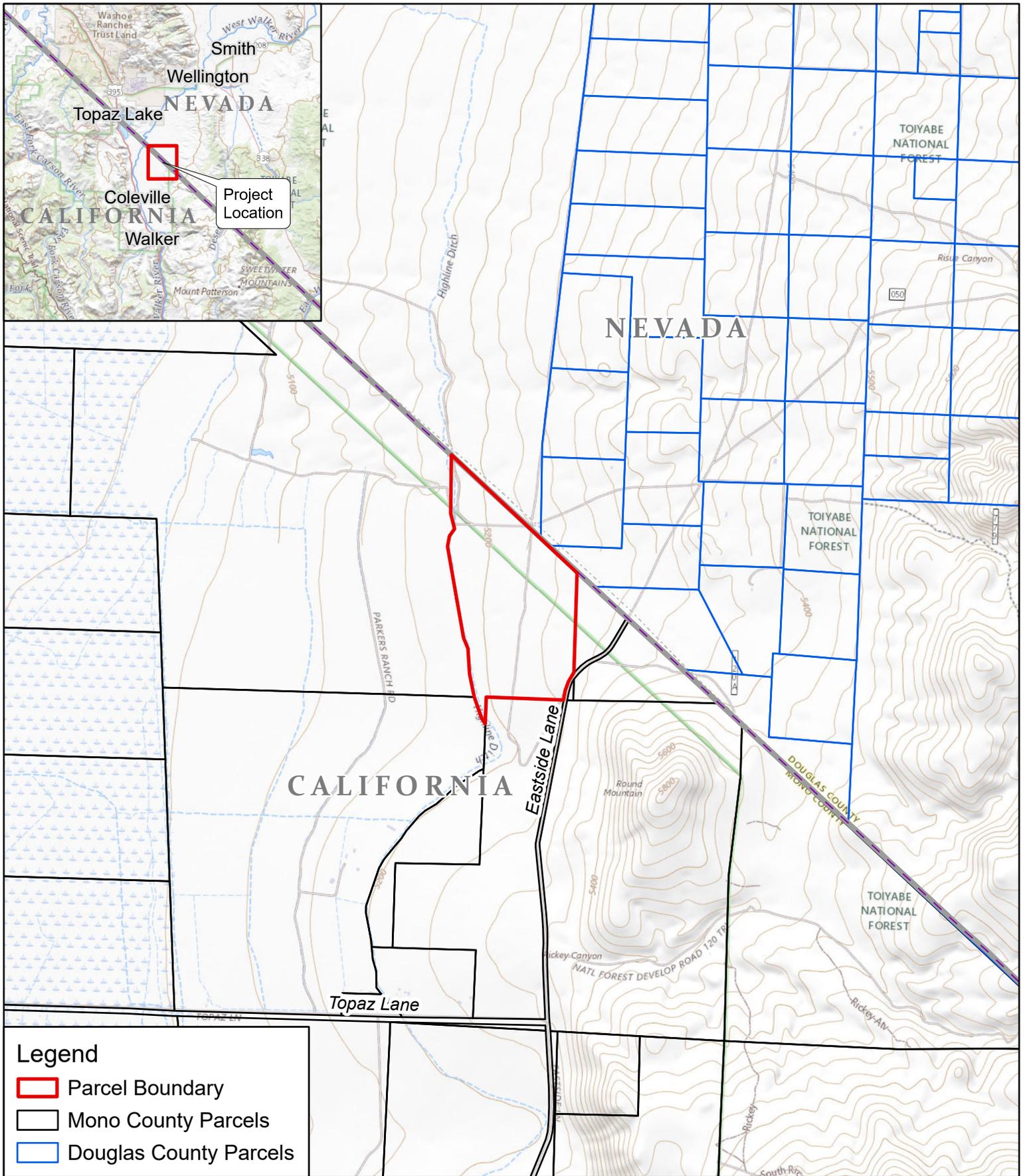
The project proposes to construct an adult/medical cannabis production facility that includes both indoor and outdoor cannabis cultivation (Figure 2). The project includes construction and operation of the following project components:

Indoor Cultivation

- Four 12,312 square-foot greenhouses (108' by 114') \ (up to 10,500 sq ft indoor mature plant canopy)
- One cultivation lab (4,200 sq ft, 60' by 70')
- One maintenance shop (2,400 sq ft, 40' by 60')

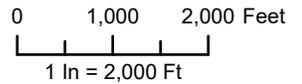
Outdoor Cultivation

- Ten acres of outdoor cannabis cultivation area including hoop house structures
- One nursery and processing building (5,000 sq ft, 50' by 100')
- One drying shed building (2,100 sq ft, 35' by 60')
- Four storage containers of approximately 8' by 40' for outdoor cultivation tools and storage use



County: Mono County, CA
 Date: 6/20/2022
 Source: USGS The National Map, 2021

Figure 1
 Sierra High Farms - Use Permit
 Location Map



*Project Area footprint is within the
 Parcel Boundary.

Supporting Facilities and Utilities

- One well pump building (169 sq ft ,13’ by 13’)
- One water tank building containing three 5,000 gallon tanks (700 sq ft, 17’ by 35’)
- One septic system (1,500 gallon holding tank, 190’ leach line)
- Propane generators for primary power supply (located within indoor cultivation buildings)
- Central propane tank (30,000 gallon)
- Access road improvements from project site to East Side Lane – widening from one to two lanes (10’ by 3,000’)
- Parking and loading areas
 - Indoor cultivation area – Parking for twelve (12) vehicles
 - Nursery parking area- Parking for three (3) vehicles
- Above ground electrical power service connection to Liberty Utilities (1.6 miles)

1.3.2 Project Phasing

The project is proposed to be implemented incrementally with the following phased improvements based on market conditions.

Table 1. Project Phasing

Phase 1
One (1) indoor cultivation building, maintenance shop, cultivation lab, access improvements, water tank, parking for indoor cultivation
Phase 2
Three (3) indoor cultivation buildings, central propane tank
Phase 3
Outdoor cultivation, drying shed, nursery, electrical service connection

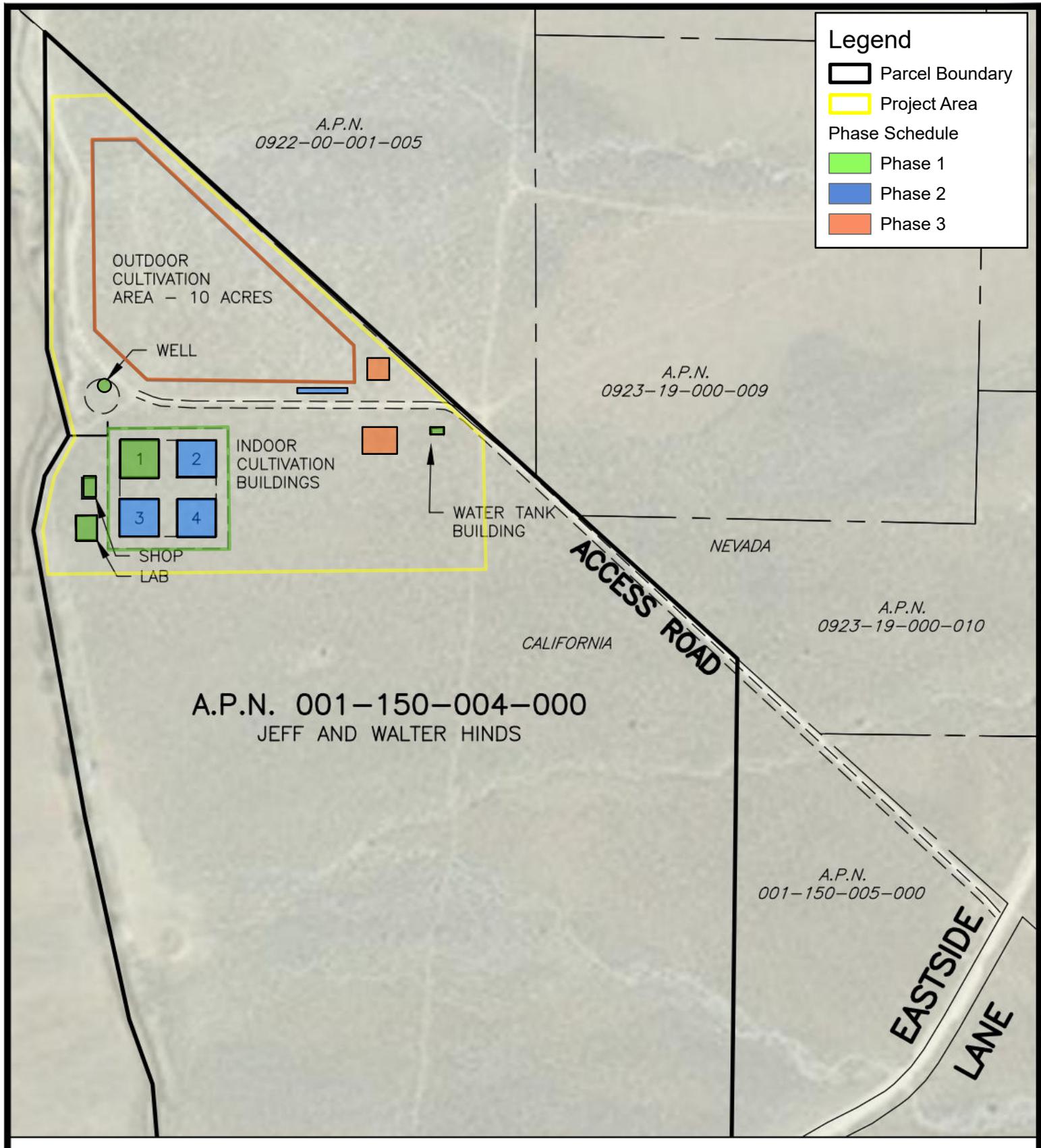
1.3.3 Construction

Project construction would take place for approximately 3 years (2 years for Phases 1 & 2, 1 year for Phase 3). The project may not be constructed continuously. Construction timing of successive Phases 2 and 3 would ultimately be determined by market conditions. Construction equipment would be variable based on activity and would include graders, backhoes, compactors, bulldozers, trenchers, water trucks, excavators, scrapers, tractors, forklifts generators, rollers, welders, and air compressors.

Table 2. Construction Phasing and Duration

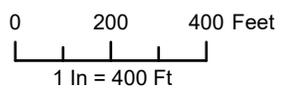
Construction Phase	Duration
Site grading – Phases 1 &2	60 days
Phase 1 – Indoor cultivation building #1, shop, and lab	6 months
Phase 2 – (3) Indoor cultivation buildings, propane tank	12 months
Phase 3 – Outdoor cultivation, drying shed, nursery, electrical service connection	12 months

Construction activities generally are clearing and grubbing of building footprints and the outdoor cultivation area. Grading activities of building pad construction with a cut and fill of approximately 13,000 cubic yards. At the completion of site grading development of the cannabis cultivation facilities would start. Indoor cultivation buildings and ancillary buildings are expected to be concrete slab and prefabricated metal buildings with grouted masonry walls. Installation of approximately 1.6 miles of above ground electricity and telecommunications would occur during Phase 3.



County: Mono County, CA
 Date: 6/20/2022
 Source: ESRI Imagery Services
 Vivid Maxar 5/15/2021

Figure 2
 Sierra High Farms - Use Permit
 Site Plan



*Project Area footprint is within the Parcel Boundary.

2.0 Regulatory Framework

The biological resources evaluated in this report are regulated by several federal, state, and local laws and regulations. Key regulations applicable to the proposed project are discussed below.

2.1 Federal

2.1.1 Federal Endangered Species Act. - U.S. Fish and Wildlife Service (USFWS)

The US Fish and Wildlife Service (USFWS) regulates the taking of a species listed as threatened or endangered under the Endangered Species Act (ESA). Section 9 of the ESA (16 U.S.C. 1538(a)(1)(B)) prohibits the take of any endangered species and defines take as follows: “the term ‘take’ means to harass, harm, pursue, hunt, shoot, kill, trap, capture, collect or to attempt to engage in any such conduct” (16 U.S.C. 1532 (19)). USFWS has further defined “harm” to mean “an act which actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding or sheltering” (50 CFR 17.3). If a proposed project would result in take of a federally listed species, either the project applicant must acquire an incidental-take permit, under Section 10(a) of the ESA, or if a federal discretionary action is involved, the federal agency would consult with the USFWS under Section 7 of the ESA.

2.1.2 Migratory Bird Treaty Act

Migratory birds are protected and managed under the Migratory Bird Treaty Act of 1918, as amended (16 U.S.C. 703 et. seq.) and Executive Order 13186. Specific provisions in the statute include the establishment of a federal prohibition, unless permitted by regulation, to "pursue, hunt, take, capture, kill, attempt to take, capture or kill, possess, offer for sale, sell, offer to purchase, purchase, deliver for shipment, ship, cause to be shipped, deliver for transportation, transport, cause to be transported, carry, or cause to be carried by any means whatever, receive for shipment, transportation or carriage, or export, at any time, or in any manner, any migratory bird, included in the terms of this Convention...for the protection of migratory birds or any part, nest, or egg of any such bird." Because forestlands provide a substantial portion of breeding habitat, land management activities within the Amador Ranger District can have an impact on local populations.

2.1.3 Bald and Golden Eagle Protection Act

The Bald and Golden Eagle Protection Act prohibits any form of possession or taking of either bald eagles or golden eagles. In 1962, the act was amended to create a specific exemption for possession of an eagle or eagle parts (e.g., feathers) for religious purposes of Indian tribes. Rule changes made in September 2009 finalized permit regulations to authorize limited take of these species associated with otherwise lawful activities. These new regulations establish permit provisions for intentional take of eagle nests under particular limited circumstances (USFWS, 2009).

2.1.4 Clean Water Act

Waters of the US and adjacent wetlands are defined within Section 404 of the federal Clean Water Act (CWA) and are under the jurisdiction of the ACOE. Section 401 of the CWA requires that waters regulated under Section 404 obtain a State Water Quality Certification to ensure that discharges into waters of the US meet state water quality standards. Water Quality Certification is administered by the State of California for any activities that may result in any discharges into waters of the US.

2.2 State of California

2.2.1 California Endangered Species Act

The California Endangered Species Act (CESA) prohibits the taking of state-listed endangered or threatened species, as well as candidate species being considered for listing. A “take” of species is defined as an activity that would directly or indirectly kill an individual of a species. If a proposed project would result in a take of a California state listed species, the project proponent must obtain a Section 2081 incidental take permit if the impacts of the take are minimized and fully mitigated, and the take would not jeopardize the continued existence of the species.

2.2.2 California Department of Fish and Game Code

Section 1602 requires that all diversions, obstructions, or changes to the natural flow or bed, channel, or bank of any river, stream, or lake in California that supports wildlife resources are subject to regulation by the California Department of Fish and Game under Section 1600 et seq. of the California Fish and Game Code. Under Section 1602, it is unlawful for any person to substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake designated by the Department of Fish and Game, without first notifying the department of such activity and obtaining a final agreement authorizing such activity.

Sections 3511, 4700 5050, and 5515 of the California Fish and Game Code prohibits the take or possession of fully protected species and does not provide for authorization of incidental take. The Department of Fish and Game has informed non-federal agencies and private parties that their actions must avoid take of any fully protected species.

Section 3503 of the California Fish and Game Code states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, including raptors (e.g., hawks, owls, eagles, and falcons). Section 3513 of the California Fish and Game Code codifies the federal Migratory Bird Treaty Act.

2.2.3 California Native Plant Protection Act of 1977

The California Native Plant Protection Act (NPPA) of 1977 (Fish and Game code §1900-1913) prohibits the importation of rare and endangered plants into California, take of rare and endangered plants, and sale of rare and endangered plants. The NPPA requires that state-listed plant species are protected and evaluated under CEQA.

2.2.4 Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act (Porter-Cologne Act) is California’s statutory authority for water quality protection. The act sets forth the obligations of the State Water Resources Control Board (SWRCB) and the Regional Water Quality Control Boards (RWQCBs) under the CWA to adopt and periodically update water quality control plans, or basin plans. The act provides for waste discharge requirements and a permitting system for discharges to land or water. Certification is required by the RWQCB for activities that can affect water quality.

2.2.5 California Food and Agriculture Code

The California Food and Agriculture Code Section 403 designates the California Department of Food and Agriculture as the lead state agency in preventing the introduction and spread of injurious insects or

animal pests, plant diseases, and noxious weeds. Food and Agriculture Code Section 7271 designates the Department of Food and Agriculture as the lead department in noxious weed management responsible for implementing state laws concerning noxious weeds. Representing a statewide program, noxious weed management laws and regulations are enforced locally in cooperation with the County Agricultural Commissioner (California Department of Food and Agriculture, 2010b).

Under state law, noxious weeds include any species of plant that is, or is liable to be, troublesome, aggressive, intrusive, detrimental, or destructive to agriculture, silviculture, or important native species, and difficult to control or eradicate, which the director, by regulation, designates to be a noxious weed (FAC Section 5004). The current designation of noxious weeds in California can be found under California Administrative Code, Title 3, Section 4500 or at www.cdffa.ca.gov/phpps/ipc/weedinfo/winfo_list-pestrating.htm.

2.3 Non-Governmental Agency

2.3.1 California Native Plant Society

The California Native Plant Society (CNPS) maintains a list of plant species native to California that are found in low numbers, have limited distribution, or are otherwise threatened with extinction. This information is published in the Inventory of Rare and Endangered Vascular Plants of California. Potential impacts to populations of CNPS-listed plants receive consideration under CEQA review.

2.4 Local

2.4.1 Mono County General Plan

The Mono County General Plan and Conservation/Open Space Element contain several policies with objectives to maintain and restore biological resources through avoidance of impacts or mitigation to reduce impacts to a level of non-significance. These policies were reviewed with respect to proposed project activities and found to be consistent; however, final determination of the project's consistency with the General Plan rests with Mono County Community Development Department. A few of the policies that pertain to this project and that were incorporated into project design and mitigation are listed below:

- Policy 2.A.1. Completing site specific resource assessments prior to project approvals
- Policy 2.A.2. Protect and restore threatened and endangered species and their habitats
- Policy 2.A.3. Protect and restore sensitive plants, wildlife, and their habitat
- Policy 2.A.4. Participate in the Bi State Local Area Working Group on sage-grouse conservation and assist with the implementation of the Bi-State Action Plan
- Policy 2.A.5. Prohibit construction activities such as grading in sensitive habitats prior to environmental review in compliance with CEQA and the Mono County Grading Ordinance
- Policy 2.A.6. During construction, utilize soil conservation practices and management techniques to conserve naturally occurring soils

3.0 Methods

3.1 Literature and Databases

Several sources of information were consulted and reviewed prior to the field reconnaissance. These included: USGS topographic map (Figure 1), soil survey data (Figure 3), National Wetland Inventory map (Figure 4), and California Natural Diversity Database occurrence data (Figure 5).

The following listed databases were queried, and results reviewed. Results of the database searches are included in Appendix C.

- USFWS's Information Planning and Conservation (IPAC) System (2022a)
- USFWS's Critical Habitat Portal (2022b)
- California Natural Diversity Database (CNDDDB) search for nine quad (CDFW 2022)
- Nevada Department of Wildlife (NDOW 2022)
- Nevada Natural Heritage Program (NNHP 2022)

3.2 Field Reconnaissance and Surveys

Preliminary reconnaissance surveys of the site were conducted on February 11, 2021 to assess the on-site vegetative communities and species habitat potential. On September 1, 2022 a qualified biologist from Resource Concepts, Inc. conducted plant surveys on foot using meandering transects. The survey was timed so that target plant species could be located and positively identified in the field. Plant species that were not easily identified in the field were collected for identification using taxonomic keys. Every plant species encountered was identified to a sufficient level to determine if it was a species of concern.

4.0 Results

4.1 Existing Conditions

The following section describes the existing site conditions.

4.1.1 Physical Characteristics and Topography

The project site is relatively flat, ranging in elevation from approximately 5,180 to 5,235 feet, sloping at 2-4 percent east to west. (Reference Figure 1).

4.1.2 Soils and Geology

The soils of the proposed Project Area are mapped by the USGS Web Soil Survey for the Coleville-Bridgeport area, parts of Alpine and Mono Counties, California primarily as Mimentor fine sandy loam, and the Indian Creek Heyborne association (reference Figure 3).

Mimentor fine sandy loam soils, 0 to 2 percent slopes, consist of sandy loam soils over clay loam soils and are derived from mixed alluvium. They are classified as well drained with a depth to water table of more than 80 inches.

A typical soil profile of Mimentor fine sandy loam soils consists of:

- 0 to 9 inches: fine sandy loam
- 9 to 24 inches: clay loam
- 24 to 36 inches: gravelly fine sandy loam
- 36 to 60 inches: gravelly sandy loam

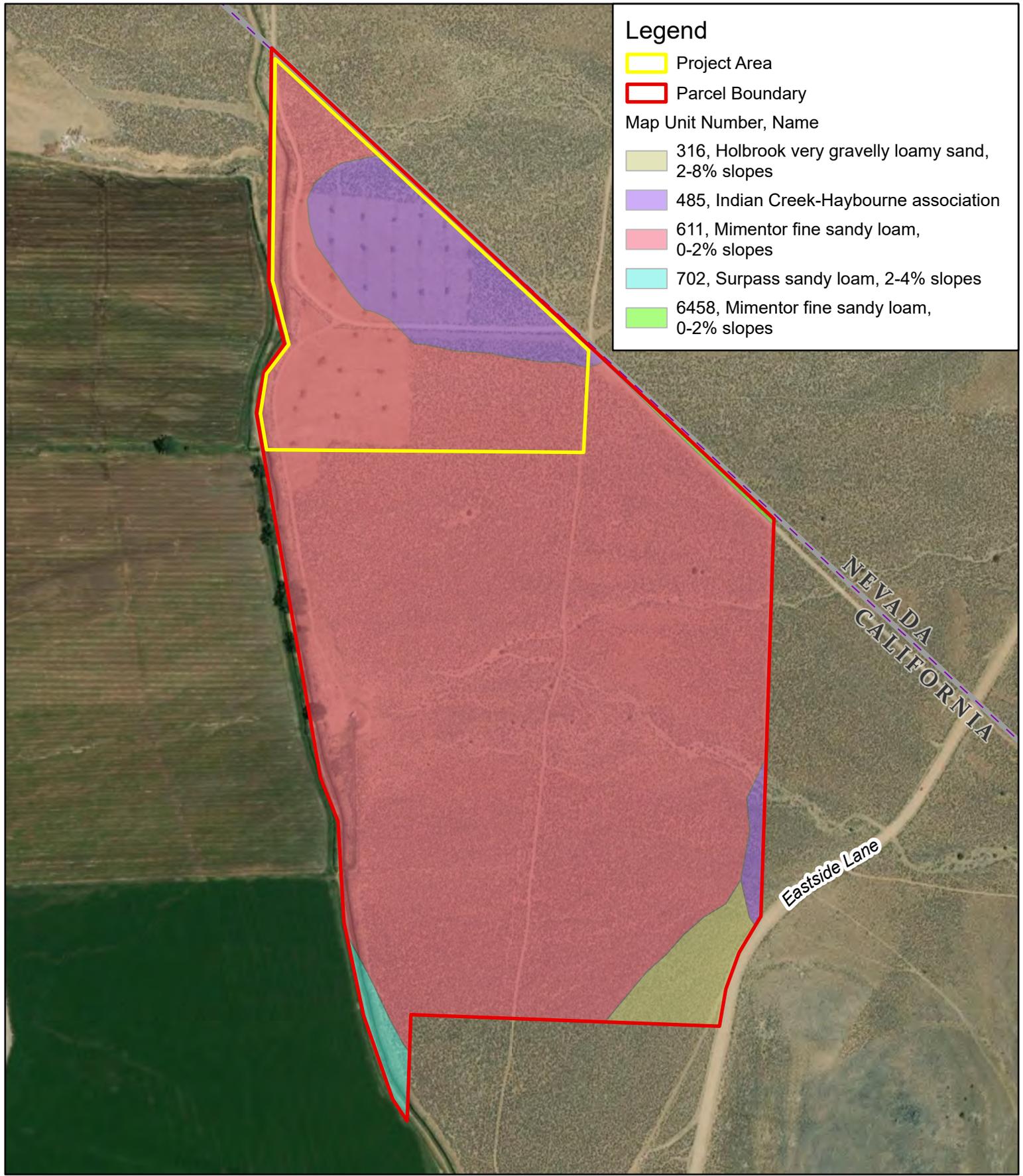
Indian Creek - Heyborne association is formed of alluvium derived from mixed rocks. The soils consist of shallow loam over gravelly clay, with a cemented layer at 20 to 25 inches. These soils are classified as well drained and depth to the water table is more than 80 inches.

A typical soil profile of Mimentor fine sandy loam soils consists of:

- 0 to 9 inches: fine sandy loam
- 9 to 24 inches: clay loam
- 24 to 36 inches: gravelly fine sandy loam
- 36 to 60 inches: gravelly sandy loam

4.1.3 Hydrology

The mean annual precipitation for the Project Area is 8 to 12 inches. The west side of the property borders Highline Ditch, which irrigates the off-site pastures to the west. There is one ephemeral stream channel that originates in the mountains to the east that flows west through the proposed outdoor cultivation area. There are no wetlands, riparian habitat, or other sensitive natural communities on-site.

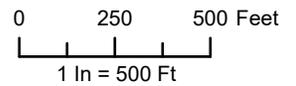


Legend

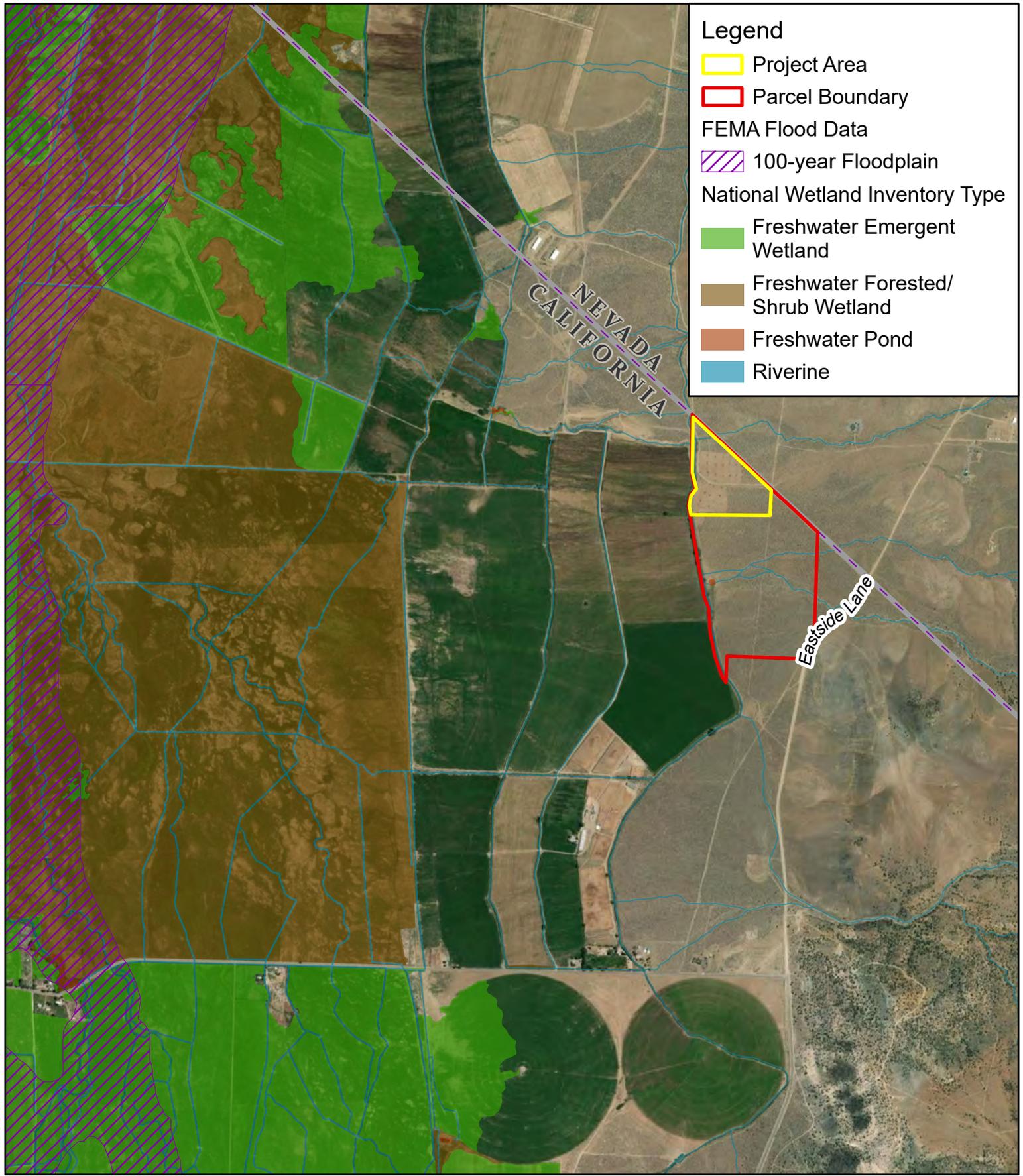
- Project Area
- Parcel Boundary
- Map Unit Number, Name
- 316, Holbrook very gravelly loamy sand, 2-8% slopes
- 485, Indian Creek-Haybourne association
- 611, Mimentor fine sandy loam, 0-2% slopes
- 702, Surpass sandy loam, 2-4% slopes
- 6458, Mimentor fine sandy loam, 0-2% slopes

County: Mono County, CA
 Date: 6/20/2022
 Source: Web Soil Survey, 2021

Figure 3
 Sierra High Farms - Use Permit
 Web Soil Survey

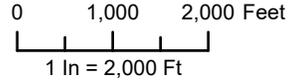


*Project Area footprint is within the Parcel Boundary.



County: Mono County, CA
 Date: 6/20/2022
 Source: National Wetland Inventory, 2021

Figure 4
 Sierra High Farms - Use Permit
 National Wetland Inventory



*Project Area footprint is within the Parcel Boundary.

4.1.4 Vegetation

The site is uniformly dominated by big sagebrush (*Artemisia tridentata* var. *wyomingensis*) with occasional four-winged saltbrush (*Atriplex canescens*), antelope bitterbrush (*Purshia tridentata*), rabbitbrush (*Ericameria nauseosa*), and Mormon tea (*Ephedra nevadensis*). There was one western juniper trees. The six acres of native vegetation that were previously cleared from the Project Area have become revegetated with native grasses intermixed with a non-native, invasive tumble mustard (*Sisymbrium altissimum*). This area will be graded and developed areas as part of the indoor grow operations.

Existing developments surrounding the project area include annual cropping systems and irrigated pastures in the areas between generally scattered housing. Long-standing pastures and agricultural fields in rotation have lost much of their former habitat value for native vegetation and wildlife in Mono County (2015 RTP/GPU).

4.2 Special Status Species

Special-status species are plants and animals that are legally protected under the CESA (Fish and Game Code, §2050 et seq.), the ESA, or other regulations. For the purposes of this study, special-status species are defined as:

- Species listed or proposed for listing as threatened or endangered under the ESA;
- Species that are candidates for possible future listing as threatened or endangered under the ESA;
- Species that are listed or proposed for listing by the State of California as threatened or endangered under the CESA;
- Plants considered by CDFW and CNPS to be “rare, threatened, or endangered in California” (Rare Plants Ranks as 1B and 2; California Department of Fish and Game, 2015a), and California Native Plant Society, (2015);
- Species that meet the definition of rare or endangered under the State CEQA Guidelines, Section 15380; and
- Animals fully protected in California (Fish and Game Code, §3511 for birds, §4700 for mammals, and §5050 for reptiles) and amphibians; or animal species of special concern to the CDFG (California Department of Fish and Game, 2011).

Additionally, protection of migratory birds and their nests is regulated by the Migratory Bird Treaty Act (MBTA). Birds may forage and nest in multiple habitats and pass through a site in route to either. Therefore, there are numerous migratory bird species that have the potential to nest within the Project Area.

Another species of concern but is not listed at the state or federal level is the Bi-State Distinct Population Segment (DPS) of Greater Sage-Grouse (*Centrocercus urophasianus*). Mono County, in cooperation with other public agencies and private stakeholders, is committed to implementation of the *Bi-State Action Plan for Conservation of the Greater Sage-Grouse Bi-State Distinct Population Segment* and implementation of the plans polices to maintain the existence of high-quality sage-grouse habitat where it occurs.

Mule deer (*Odocoileus hemionus*), although not designated as a species of concern by CDFW, are also treated as sensitive in this analysis. A decline in mule deer numbers in the mid- to late 1960s prompted CDFW to formulate a statewide management plan, followed by specific deer herd management plans.

Seven of these management plans apply to the resident and migratory deer of Mono County, including the West Walker herd located within the vicinity of the Project Area.

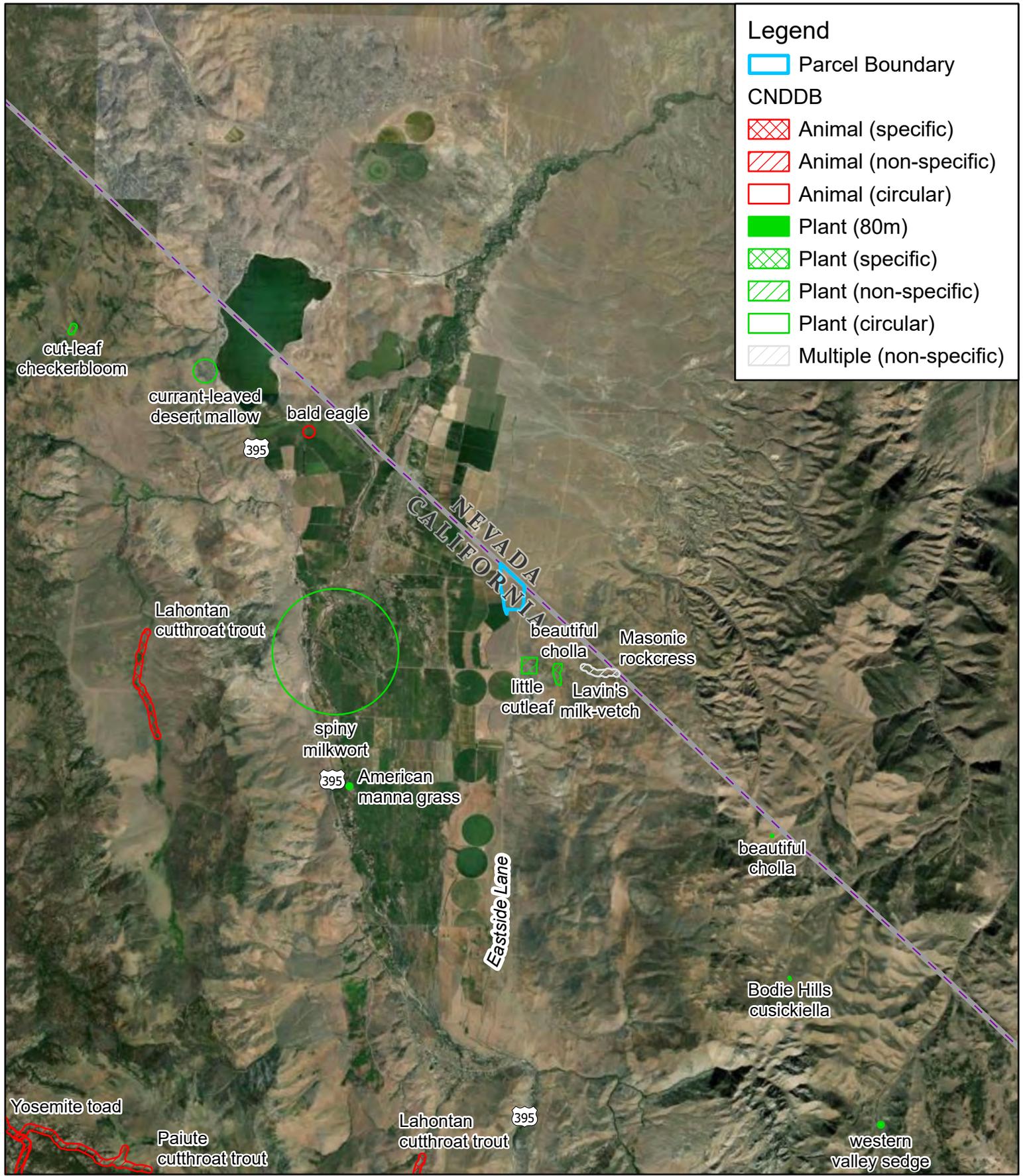
4.2.1 Special Status Plants

Based on review of the CNDDDB (Figure 5) and U.S. Fish and Wildlife Species List (reference Attachment C) and evaluation of specific habitat requirements, two special status plant species were determined to have potential to occur within the Project Area. These species are beautiful cholla (*Grusonia pulchella*) and Masonic rockcress (*Boechera cobrensis*).

Table 3. Special Status Plant Species with Potential to Occur on Site or Within Vicinity of the Project Area

Common Name / Scientific Name	USFWS	State Status	CNPS	Habitat Description	Potential Habitat within Project Area / Potential to Impact
Lavin's milk-vetch -- <i>Astragalus oophorus</i> var. <i>lavinii</i>	--	--	1B.2	Open, dry, relatively barren gravelly clay slopes, knolls, badlands, or outcrops, derived from volcanic ash or carbonate, usually on northeast to southeast aspects, in openings in the pinyon-juniper or sagebrush zones. 6,560 ft + elevation.	None. The Project Area does not contain gravelly clay slopes, knolls, or outcrops on volcanic or carbonate soils. Site located below documented elevation range.
Masonic rockcress -- <i>Boechera cobrensis</i>	--	--	2B.3	Sandy soils under shrubs in sagebrush scrub, northern juniper woodlands, Pinyon-juniper woodlands. 4,420-11,155 ft.	May occur, not likely to occur. Potential habitat present within sandy soils within sagebrush community; no individuals present during previous site surveys. One occurrence documented 2.2 miles to the southeast.
Liddon's sedge - <i>Carex petasata</i>				Broadleaf upland forest, lower montane coniferous forest, meadows and seeps, pinyon and juniper woodland. 2740 – 3030 ft.	None. There are no broadleaf upland forest, lower montane coniferous forest, meadows and seeps, pinyon and juniper woodland.
Western Valley Sedge -- <i>Carex vallicola</i>	--	--	2B.3	Moist to dry slopes, montane. 5,900-10,170 ft.	None. No moist to dry slopes. Project Area located below documented elevation range.
Bodie Hills cusickiella -- <i>Cusickiella quadricostata</i>	--	--	1B.2	Rocky flats within sagebrush scrub, slopes, and PJ Woodlands. 7,545-9,185 ft.	None. There are no rocky flats within Project Area. Site elevation is below known occurrence of species.
Beautiful cholla -- <i>Grusonia pulchella</i>	--	CY	2B.2	Dry, open, loose, mostly sandy soils, sometimes gravelly or rocky (especially carbonate) soils of valley floors and gentle slopes in the shadscale, mixed shrub, sagebrush, and lower pinyon-juniper zones. 4,920-5,580 ft.	May occur, not likely to occur. Potential habitat present in sandy flats within sagebrush; no individuals present during previous site surveys. Two occurrences documented at 1.5 and 5.8 miles away.

Little cutleaf -- <i>Hymenopappus filifolius</i> var. <i>nanus</i>	--	--	2B.3	Pinyon and juniper woodland, subalpine coniferous forest. 4920 ft – 10,000 ft	None. There are no pinyon/juniper woodlands or subalpine coniferous forest within the Project Area.
Spiny milkwort -- <i>Polygala subspinos</i>	--	--	2B.2	Desert scrub, volcanic mesas. 4,430-7,496 ft.	None. No volcanic soils within Project Area.
Cut-leaf checkerbloom -- <i>Sidalcea multifida</i>	--	--	2B.3	Dry places in sagebrush scrub and pine forest. 6,560-9,185 ft.	None. The Project Area is located approx. 1,000 feet below in elevation than any documented occurrences.
Currant-leaved desert mallow -- <i>Sphaeralcea grossulariifolia</i>	--	--	2B.3	Dry volcanic soils.	None. The on-site soils are not derived from volcanics.



County: Mono County, CA
 Date: 6/20/2022
 Source: CNDDDB June, 2022

Figure 5
 Sierra High Farms
 California Natural Diversity Database Map



*Project Area footprint is within the Parcel Boundary.

4.2.2 Special Status Wildlife Species

Review of the CNDDDB and U.S. Fish and Wildlife Species List identified 14 special status wildlife that are known or expected to occur near the Project Area. The table below lists the special status wildlife species with potential to occur on-site and the likelihood of occurrence based on the availability of suitable habitat. There were no proposed or designated critical habitats located within the Project Area.

Table 4. Special Status Wildlife Species with Potential to Occur On-Site or Within Vicinity of the Project Area

Common Name / Scientific Name	Status		Habitat Description	Potential Habitat within Project Area / Potential to Impact
	ESA	State Status		
Amphibians				
Yosemite Toad -- <i>Anaxyrus canorus</i>	FT	SSC S2S3	Always in vicinity of wet meadow, also in seasonal ponds associated with lodgepole pine and subalpine conifer forest. 6,400-11,300 ft in elevation.	None. There are no wet meadow or ponds on-site. Project area is not located within known elevation range of species habitat. The project would not impact the Yosemite toad.
Sierra Nevada Yellow-legged Frog -- <i>Rana sierrae</i>	FE		High elevation low-gradient streams and small ponds that are either intermittent or perennial. Always encountered within a few feet of water.	None. There are no streams or ponds on-site. The project would not impact Sierra Nevada Yellow-legged Frog or potential habitat.
Fish				
Lahontan Cutthroat trout -- <i>Oncorhynchus clarkii henshawi</i>	FT	none	Occurs in cool flowing water with available cover of well-vegetated and stable stream banks, in areas where there are stream velocity breaks, and in relatively silt free, rocky riffle-run areas. Lahontan cutthroat trout (LCT) are known to occur in the Middle West Walter River (NDOW 2022).	None. There are no well-vegetated and stable streambanks with rock riffle run areas on-site. The project would not impact LCT or potential habitat.
Mountain whitefish -- <i>Prosopium williamsoni</i>	none	SSC	Commonly found in mountain streams and lakes, favoring cold water and large deep pools.	None. There are no mountain streams or lakes within the project area. The project would not impact Mountain whitefish
Lahontan mountain sucker -- <i>Catostomus lahontan</i>	None	SSC	Found in shallow (<2m), clear, low-gradient streams; associated with diverse substrates, in areas with dense cover.	None. There are no streams within the Project Area. The project will not impact Lahontan mountain sucker.
Birds				
Golden Eagle -- <i>Aquila chrysaetos</i>	FP	S3 BCC	Annual grassland to above timberline; generally, inhabit open and semi-open country such as sagebrush, surrounded by hills and cliffs for nesting.	May occur. May use site for foraging. No suitable nesting habitat available.

Common Name / Scientific Name	Status		Habitat Description	Potential Habitat within Project Area / Potential to Impact
	ESA	State Status		
Long-eared owl -- <i>Asio otus</i>	None	S2 SSC	Deciduous and evergreen forests, orchards, wooded parks, desert oases. Wooded areas with dense vegetation needed for roosting and nesting; open areas for hunting.	None. No forested or wooded habitat present.
Swainson’s hawk -- <i>Buteo swainsoni</i>	None	S2	Large riparian nesting trees, agricultural fields and open shrublands. Occupy juniper/sagebrush communities. Adapted to agricultural landscapes.	May occur. May use site for foraging. No suitable nesting habitat available.
Greater Sage-grouse -- <i>Centrocercus urophasianus</i> Bi-State DPS	None	SSC	Foothills, plains, and mountain slopes where sagebrush is present, often with a mixture of sagebrush, meadows, and aspen, in close proximity.	May occur, not likely to occur. Suitable sagebrush habitat present but lacks the meadow component. Per NDOW, no known leks or tracking locations in the vicinity of the Project Area.
Northern Harrier -- <i>Circus cyaneus</i>	None	S3 SSC	Wet meadows and grasslands with low, thick vegetation. May utilize dry upland areas. Roosts on ground.	May occur, not likely to occur. May use site for foraging. No wet meadow or grasslands present for nesting.
Yellow warbler -- <i>Setophaga petechia</i>	none	S3 SSC	Habitat includes open scrub, second-growth woodland, thickets, farmlands, and gardens, especially near water; riparian woodlands, especially of willows are typical habitat in the West.	None. No dense woodlands or thickets on-site. No impact to yellow warblers.
Southwestern Willow Flycatcher -- <i>Empidonax traillii extimus</i>	FE	S1	Utilizes relatively dense riparian tree and shrub communities associated with rivers, swamps, and other wetlands. Habitat patches must be at least 0.25 acres in size and at least 30 feet wide.	None. There is no riparian habitat on-site. The project would not impact SW willow flycatcher or potential habitat.
Prairie Falcon -- <i>Falco mexicanus</i>		S3 BCC	Open areas, steppe, plains or prairie. Typically nests in pothole or well sheltered ledge on rocky cliff or steep embankment.	May occur. May use site for foraging. No suitable nesting habitat available.
Bald Eagle -- <i>Haliaeetus leucocephalus</i>	D FP	S2 SE	Nest near river and large lakes, utilizing old growth trees, snags, and cliffs.	None. There are no rivers, lakes or nesting habitat. The project would not impact the bald eagle.
Brewer’s sparrow -- <i>Spizella breweri</i>	None	S3 BCC	Strongly associated with sagebrush. Nests low in sagebrush, other shrub, or cactus.	May occur. May use site for foraging and nesting.
Yellow-headed blackbird -- <i>Xanthocephalus</i>	None	S3, S4 SSC	Fresh-water marshes of cattail, tule or bulrushes.	None. No fresh-water marshes in vicinity of the project area.

Common Name / Scientific Name	Status		Habitat Description	Potential Habitat within Project Area / Potential to Impact
	ESA	State Status		
Yellow-billed Cuckoo -- <i>Coccyzus americanus</i>	FT		Breeds in low to moderate elevation in native forests lining rivers and streams. Requires relatively large (>20 hectares) contiguous patches of multilayered riparian habitat for nesting.	None. There are no forests lining streams and rivers on-site. The project would not impact the yellow-billed cuckoo or potential habitat.
Mammals				
Pallid bat -- <i>Antrozous pallidus</i>	--	S3 SSC	Deserts, grasslands, shrublands, woodlands and forests. Most common in open, dry habitats with rocky areas for roosting.	May occur. May use site for foraging. No suitable roosting habitat available.
Townsend's big-eared bat -- <i>Corynorhinus townsendii</i>	None	S2	Most common in mesic sites; roost in the open, hanging from walls and ceilings.	May occur. May use site for foraging. No suitable roosting habitat available.
Wolverine -- <i>Gulo gulo</i>	None	Threatened FP	Wide variety of high elevation habitat. Uses caves, logs, burrows for cover and den area. Hunts in open areas	None. No suitable denning habitat.
Silver-haired bat -- <i>Lasionycteris noctivagans</i>	None	S3S4	Montane forest dweller, feeding over streams, ponds and open brushy areas. Roosts in hollow trees, beneath bark, abandoned woodpecker holes.	May occur. May use site for foraging. No suitable roosting habitat available.
Hoary bat -- <i>Lasiurus cinereus</i>	None	S4	Open habitats or habitat mosaics, with access to trees for cover and open area or habitat edges for feeding; roosts in dense foliage of medium to large trees.	May occur. May use site for foraging. No suitable roosting habitat available.
Western white-tailed jackrabbit -- <i>Lepus townsendii townsendii</i>	None	S2 SSC	Open grassy fields, desert scrubland and farmland.	May occur, not likely to occur. Habitat present, but species considered uncommon to rare on the eastern slopes of Sierra Nevada (CDFW 2022).
Western small-footed myotis (bat) -- <i>Myotis ciliolabrum</i>	None	S2S3	Wide range of habitats, mostly arid wooded and brushy uplands near water. Cover in caves, buildings, mines, and crevices.	May occur. May use site for foraging. No suitable roosting habitat available.
Long-eared myotis -- <i>Myotis evotis</i>	None	S4	Brush, woodland, and forest habitat; prefers woodlands and forests. Nursery colonies in buildings, crevices, spaces under bark, snags.	None. No forest or woodlands present. No suitable roosting habitat available.
Fringed myotis -- <i>Myotis thysanodes</i>	None	S4	Uses a wide variety of habitats. Pinyon-juniper, uses caves, mines, buildings, or crevices for maternity colonies.	May occur. May use site for foraging. No suitable roosting habitat available.
Yuma myotis -- <i>Myotis yumanensis</i>	None	S4	Open forests and woodlands; closely tied to bodies of water. Maternity colonies in caves, mines, buildings, or crevices.	None. No forest or woodlands present; no water bodies or roosting habitat.

Common Name / Scientific Name	Status		Habitat Description	Potential Habitat within Project Area / Potential to Impact
	ESA	State Status		
American badger -- <i>Taxidea taxus</i>	None	S4 SSC	Prefers open areas, brushlands with little groundcover. Can include parklands, farms and treeless area with friable soil.	None. Site soils not friable or suitable for burrows.
Insects				
Morrison bumble bee -- <i>Bombus morrisoni</i>	None	S1S2	From the Sierra-Cascade Range eastward across intermountain west. Food plant genera include <i>Cirsium</i> , <i>Cleome</i> , <i>Helianthus</i> , <i>Lupinus</i> , <i>Ericameria</i> , and <i>Melilotus</i> .	None. Site is dominated primarily by sagebrush scrub with few forbs present.
Monarch Butterfly -- <i>Danaus plexippus</i>	C	none	open fields and meadows with milkweed.	None. No milkweeds observed within the Project Area.

State Ranking – CNDDDB State Conservation Ranking (CDFW 2014)

- S1 is Critically imperiled: often 5 or fewer populations, or steep rate of decline,
- S2 is Imperiled: Often 20 or fewer populations, steep decline or very restricted in range,
- S3 is Vulnerable: often 80 or fewer populations, declining or restricted range,
- S4 is Apparently Secure: uncommon but not rare in California

SSC – CDFW Species of Special Concern

BCC – USFWS Birds of Conservation Concern

- ESA ST – State Threatened
- SE – State Endangered
- FT – Federally Threatened
- FE – Federally Endangered

Other Species of Special Concern

Greater Sage-Grouse

The Bi-State Distinct Population Segment (DPS) of Greater Sage-Grouse (*Centrocercus urophasianus*) is another species of concern to Mono County but is not listed at the state or federal level. There is relatively marginal potential for presence of sage-grouse in the remaining sagebrush-dominated uplands surrounding Coleville during the normal brood-rearing period (March 1 – Sept 30) (2015 RTP/GPU). Based on consultation with the Nevada Department of Wildlife, there are no known Greater Sage-Grouse lek sites in the vicinity of the Project Area (NDOW 2022).

Mule Deer

There are no known migration corridors through the Project Area, but Mule deer may potentially use the on-site shrub habitat for overwintering (NDOW 2022, BIOS 2022).

4.2.3 Migratory Birds – Breeding and Nesting Habitat

Protection of migratory birds and their nests is regulated by the MBTA. Birds may forage and nest in multiple habitats and pass through a site in route to either. Nesting season in the Coleville area extends

from March 1 through September 30. Therefore, there are numerous migratory bird species that have the potential to nest within the Project Area.

4.3 Potentially Jurisdictional Water Resources

Based on field surveys by RCI Biologist (February 2021 and September 2022) and review of the National Wetlands Inventory, it was determined that there are no wetlands within the Project Area. There is one ephemeral stream that originates in the steeper mountain slopes to the east and flows dissipate within the Project Area. There is no channelized flow into the Highline Ditch.

The Highline Ditch conveys water from the East Slough, a canal off the West Walker River, north approximately 6.7 miles through pastures and agricultural fields, and discharges back to the West Walker River approximately 4.7 miles north of the Project Area. The ditch borders the west side of the Project Area. There are dirt access roads that run along both sides of the ditch as it parallels the site. Vegetation along the banks is primarily sagebrush and invasive weeds. The vegetation below the top of has small patches of riparian vegetation. There are no trees along the banks of the ditch through the project area

5.0 Project Impacts and Mitigation Measures

5.1 Potential Impacts and Standards of Significance

Potential direct and indirect impacts to biological resources are discussed in the following sections. Direct effects to a sensitive species or potential habitat occur from physical impacts caused by activities associated with the proposed project. Direct impacts from this project include those impacts caused by disturbance from construction equipment, trenching, grading activities, or long-term operation of the cannabis farm.

Potential indirect effects on sensitive species or their potential habitat are effects that are separated from an action in either time or space. Indirect effects resulting from project implementation may affect the quantity, quality, and distribution of habitats and may have positive or negative effects on sensitive resources. Indirect effects may also be caused by temporary construction activities that increase air pollution, noise, or human presence in such a way that temporarily disrupts nearby species and habitat vitality. Erosion or increased surface runoffs that may affect down gradient waters is an example. With respect to the latter, all project grading will be subject to the typical restrictions and requirements that address erosion and runoff, including National Pollution Discharge Elimination System (NPDES) and California's General Construction Permit, which requires preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP).

The impact analysis below is based on the State CEQA Guidelines Appendix G thresholds of significance. The project is considered to have a significant impact to vegetation and wildlife if it would:

1. Have a substantial adverse effect, either directly or through habitat modifications on any species identified as candidate, sensitive, or special status in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.
2. 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.
3. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the CWA (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
4. 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.
5. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
6. Conflict with any provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan.
7. Reduce the number or restrict the range of an endangered, rare, or threatened plant or animal species or biotic community, thereby causing the species or community to drop below self-sustaining levels.

5.2 Impact Analysis and Mitigation

The following sections analyze the potential permanent and temporary direct and indirect impacts to sensitive biological resources from project activities specific to the proposed Sierra High Farm project. The mitigation measures proposed below are incorporated to minimize and avoid project impacts.

5.2.1 Special Status Plants

Suitable habitat for two (2) listed plant species occurs on-site and would be affected by the proposed activities. The species status plant species beautiful cholla (State protect cactus, CNPS 2B.2) and masonic rockcress (CNPS 2B.3) are typically associated with sandy soils in sagebrush scrub (reference Table 4 above). A field survey for special status plant species was completed on September 1, 2022 by RCI Sr. Biologist. All plant species encountered were identified to a sufficient level to determine if it was a species of concern. Based on survey results from September 1, 2022, these two species were not identified on-site and no direct effects to these special status species is anticipated.

Direct effects from the proposed project to potential habitat for special status species would occur from removal of approximately 15 acres of upland sagebrush shrub habitat during grading and construction of the four indoor cultivation buildings, associated support buildings (e.g., water tank, shop, and lab), and widening of the existing access road. Additionally, approximately ten acres of upland shrub habitat will be impacted during phase 3 of the project through removal of vegetation for outdoor cultivation. These actions would result in permanent, direct impacts to potential habitat for beautiful cholla and masonic rockcress. However, based on the abundance of similar potential habitat surrounding the project area, direct effects to potential habitat for the two special status species was determined to be less than significant.

Significance after Mitigation

There would be no significant impacts to special status plants and no mitigation is proposed.

5.2.2 Special Status Wildlife

Federally and State Protected Species

Based on initial observations of on-site habitat, there is no potential habitat for federally or state listed wildlife species. No federally or state ESA listed wildlife species have potential to occur within the Project Area.

There are 12 special status wildlife species that may occur within the Project Area. These include seven state protected bat species and five special status bird species.

There is suitable foraging habitat for bats on-site but no suitable roosting habitat present. Because of the abundance of similar foraging habitat surrounding the Project Area and the bats ability to avoid construction activities, it is determined there will be no significant impacts to the seven bat species.

There is potential for five species of special status bird species. Four of these species (Golden Eagle, Swainson's Hawk, Northern Harrier, and Prairie Falcon) may utilize the site for foraging, but there is

no suitable nesting habitat for these species within the Project Area. Similar to the bat species, the proposed project will have no significant impact on these four species.

The Brewer's sparrow is identified as having potential to nest on-site. The Brewer's sparrow is listed as a USFWS Bird of Conservation Concern and has been given a S3 ranking by the State due to its declining population. Brewer's sparrow tend to nest in low sagebrush and other shrubs. Therefore, Brewer's sparrow, along with other nesting birds, have the potential to be impacted by clearing and grading activities that remove potential nesting habitat. If clearing occurs during the nesting season, the project could result in direct impacts to the Brewer's sparrow and other nesting birds should they be present. Indirect effects from elevated noise and increased human activity may result in nest abandonment if nesting birds are present within 200 feet. These impacts are less than significant when the following mitigation is implemented.

Mitigation Measure BIO-1- Nesting Birds Surveys

The project applicant would implement the following practices for protection of bird species with the potential to nest within the Project Area.

- Pre-project surveys for nesting birds and raptors will be conducted in suitable nesting habitat within 500 feet of vegetation removal, construction, and development activities, and will be reviewed and accepted by the Mono County Community Development Department prior to site disturbance or construction activity. Determination of habitat suitability, and whether a pre-project survey is required should be based on a reconnaissance field assessment of habitat conditions before initiating projects in these areas

Survey Timing: March 1 to August 31

- If an active bird nest is located during the pre-project surveys, the project proponent will notify Mono County and the CDFW. To avoid disturbances to or loss of active nest sites, between March 1 and August 31, project activities would be delayed within 0.25 mile of (or at a distance directed by the appropriate regulatory agency) the nest to avoid disturbance until the nest is no longer active. Project activities include vegetation removal, earth moving, and construction. The 0.25-mile buffer may be reduced through consultation with Mono County and/or the CDFW Biologist.

Significance after Mitigation

Implementation of the mitigation measures BIO-1 described above would ensure potential impacts to nesting birds would be **less than significant** by avoiding the species.

Other Species of Special Concern

Greater Sage-grouse

The proposed project may remove up to 15 sagebrush communities that provide marginal sage-grouse habitat. Potential impacts from the proposed project include loss of habitat, increased vehicular traffic and potential for roadkill, trampling of nests or activities that cause nest abandonment, and introduction/expansion of invasive species that modifies habitat quality. Additionally, the construction of

aboveground transmission pole lines contributes to the fragmentation of sage-grouse habitat and increases the risk of predation by providing predator perches in sagebrush habitat.

Although potential habitat exists within the Project Area, likelihood of sage-grouse currently using the low-quality sagebrush habitat surrounding Coleville is low (2015 RTP/GPU) and there are no known lek locations within the vicinity of the Project Area (NDOW 2022). Due to the size of the Project Area and location within marginal habitat with no known occurrences of sage-grouse, the impact to sage-grouse from the proposed project is determined to be less than significant.

Mule Deer

There are no known mule deer migration corridors through the Project Area (NDOW 2022, BIOS 2022), but mule deer may potentially use the on-site shrub habitat for overwintering. Site development and increase in human activities have the potential to impact survivorship and fecundity of mule deer due to the reduction of critical browse and vehicle collisions (2015 RTP/GPU). However, based on the minimal size of impact to potential habitat relative to the surrounding availability of suitable wintering habitat and the minimal increase in traffic from the proposed project, potential impact to mule deer is determined to be less than significant.

Significance after Mitigation

There would be no significant impacts to greater sage-grouse or mule deer and no mitigation is proposed.

5.2.3 Special Status Bird Species – Migratory Birds

The Project Area provides suitable habitat for nesting and/or foraging migratory birds and other special status bird species as described above. Additionally, raptors that may be nesting within proximity to the Project Area (not anticipated to be nesting on-site) may be indirectly impacted by construction activities. The project would potentially remove 15 acres of upland shrub vegetation from clearing and grading activities. If clearing occurs during the nesting season, the project could result in direct impacts to nesting birds should they be present. Indirect effects from elevated noise and increased human activity may result in nest abandonment if nesting birds are present within 200 feet (or 500 feet for raptors). Construction activities may result in adverse impacts on breeding and nesting special status bird species should they be present.

To avoid impacts to breeding or nesting birds or minimize potential affect to less than significant levels, Mitigation Measure BIO-1 would be implemented as described above.

Significance after Mitigation

Implementation of the mitigation measure BIO-1 described above would ensure potential impacts to migratory birds and raptors would be **less than significant** by avoiding the species.

5.2.4 Invasive and Noxious weeds

Vegetation removal and soil disturbance construction of the indoor cultivation facility, road widening, and disturbance associated with power line construction could create conditions for the establishment of undesirable weed species. Once established, invasive and noxious weeds could negatively and indirectly affect native species by competing for resources such as water and light, production, and release of chemical compounds that inhibit the growth of other plants. In turn, this effect can change the community

composition through elimination or reduction of native plant species or by changing the vegetation structure. The changes in community composition or vegetation structure could affect fire regimes and can also negatively affect habitat for wildlife.

To avoid direct and indirect impacts to special status plant and wildlife species or their habitat or to minimize potential affect to less than significant levels, the following mitigation measures are proposed.

Mitigation Measure BIO-2 – Weed Surveys

Prior to construction, the entire Project Area would be surveyed for noxious weeds. All occurrences of noxious weeds would be flagged and avoided.

Mitigation Measure BIO-3 - Weed Free Certification

Straw, mulch, or gravels used for erosion control would be certified weed-free.

Significance after Mitigation

Implementation of the mitigation measures BIO-2 and BIO-3 described above would ensure potential impacts to biological resources from invasive and noxious weed species would be reduced to less than significant levels.

5.2.5 Jurisdictional Waters

The SWRCB has developed a policy for water quality control to establish principles and guidelines for cannabis cultivation, as well as the Cannabis General Order (SWRCB Order WQ 2019-0001-DWQ). The General Order includes enforceable requirements for cannabis cultivators to ensure their operations do not impact water resources. Enrollment in the Statewide Cannabis General Order is required for all legal cannabis cultivation facilities and is a required step to obtaining a CalCannabis license for cannabis cultivation. Attachment A of the General Order includes a list of Best Management Practices. To obtain coverage under the waiver or enroll under the general order, the discharger is required to submit an online application and application fee and relevant technical reports. At a minimum, the applicant would be required to provide a site management plan, nitrogen management plan, and site closure report.

Because applicable state and local regulations require water quality control measures for construction and operation of the project, this impact would be less than significant.

6.0 References

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- Zeiner, D.C., W.F.Laudenslayer, Jr., K.E. Mayer, and M. White, eds. 1988-1990. *California's Wildlife. Vol. I-III. California Department of Fish and Game, Sacramento, California*. Updates are noted in accounts that have been added or edited since original publication.

Attachment A

Biological Data



Selected Elements by Scientific Name

California Department of Fish and Wildlife

California Natural Diversity Database



Query Criteria: Quad (Topaz Lake (3811965) OR Coleville (3811955) OR Risue Canyon (3811954) OR Long Dry Canyon (3811964)) AND CNPS List IS (1A OR 1B OR 1B.1 OR 1B.2 OR 1B.3 OR 2A OR 2B OR 2B.1 OR 2B.2 OR 2B.3)

Table with 7 columns: Species, Element Code, Federal Status, State Status, Global Rank, State Rank, Rare Plant Rank/CDFW SSC or FP. Rows include Astragalus oophorus var. lavinii, Boechea cobrensis, Carex petasata, Carex vallicola, Cusickiella quadricostata, Glyceria grandis, Grusonia pulchella, Hymenopappus filifolius var. nanus, Polygala subspinosa, Sidalcea multifida, and Sphaeralcea grossulariifolia.

Record Count: 11



Selected Elements by Element Code
 California Department of Fish and Wildlife
 California Natural Diversity Database



Query Criteria: Quad IS (Topaz Lake (3811965) OR Coleville (3811955) OR Risue Canyon (3811954) OR Long Dry Canyon (3811964)) AND Taxonomic Group IS (Fish OR Amphibians OR Reptiles OR Birds OR Mammals OR Crustaceans OR Insects) AND (Federal Listing Status IS (Endangered OR Threatened OR Proposed Endangered OR Proposed Threatened) OR State Listing Status IS (Endangered OR Threatened OR Rare))

Element Code	Species	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
AAABB01040	<i>Anaxyrus canorus</i> Yosemite toad	Threatened	None	G2G3	S2S3	SSC
ABNKC10010	<i>Haliaeetus leucocephalus</i> bald eagle	Delisted	Endangered	G5	S3	FP
AFCHA02081	<i>Oncorhynchus clarkii henshawi</i> Lahontan cutthroat trout	Threatened	None	G5T3	S1	
AMAJF03010	<i>Gulo gulo</i> wolverine	None	Threatened	G4	S1	FP

Record Count: 4

IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

Location

Mono County, California



Local office

Reno Fish And Wildlife Office

☎ (775) 861-6300

📠 (775) 861-6301

1340 Financial Boulevard, Suite 234

Reno, NV 89502-7147

<http://www.fws.gov/reno/>

Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species¹ and their critical habitats are managed by the [Ecological Services Program](#) of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries²).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact [NOAA Fisheries](#) for [species under their jurisdiction](#).

-
1. Species listed under the [Endangered Species Act](#) are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the [listing status page](#) for more information. IPaC only shows species that are regulated by USFWS (see FAQ).
 2. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

Birds

NAME	STATUS
Southwestern Willow Flycatcher <i>Empidonax traillii extimus</i> Wherever found There is final critical habitat for this species. The location of the critical habitat is not available. https://ecos.fws.gov/ecp/species/6749	Endangered
Yellow-billed Cuckoo <i>Coccyzus americanus</i> There is final critical habitat for this species. The location of the critical habitat is not available. https://ecos.fws.gov/ecp/species/3911	Threatened

Amphibians

NAME	STATUS
Sierra Nevada Yellow-legged Frog <i>Rana sierrae</i> Wherever found There is final critical habitat for this species. The location of the critical habitat is not available. https://ecos.fws.gov/ecp/species/9529	Endangered
Yosemite Toad <i>Anaxyrus canorus</i> Wherever found There is final critical habitat for this species. The location of the critical habitat is not available. https://ecos.fws.gov/ecp/species/7255	Threatened

Insects

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/9743	Candidate

Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

THERE ARE NO CRITICAL HABITATS AT THIS LOCATION.

Migratory birds

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

1. The [Migratory Birds Treaty Act](#) of 1918.
2. The [Bald and Golden Eagle Protection Act](#) of 1940.

Additional information can be found using the following links:

- Birds of Conservation Concern <http://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php>
- Measures for avoiding and minimizing impacts to birds <http://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php>
- Nationwide conservation measures for birds <http://www.fws.gov/migratorybirds/pdf/management/nationwidestandardconservationmeasures.pdf>

The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern](#) (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ [below](#). This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the [E-bird data mapping tool](#) (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found [below](#).

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME

BREEDING SEASON (IF A
BREEDING SEASON IS INDICATED
FOR A BIRD ON YOUR LIST, THE
BIRD MAY BREED IN YOUR
PROJECT AREA SOMETIME WITHIN
THE TIMEFRAME SPECIFIED,
WHICH IS A VERY LIBERAL
ESTIMATE OF THE DATES INSIDE

WHICH THE BIRD BREEDS
ACROSS ITS ENTIRE RANGE.
"BREEDS ELSEWHERE" INDICATES
THAT THE BIRD DOES NOT LIKELY
BREED IN YOUR PROJECT AREA.)

Bald Eagle *Haliaeetus leucocephalus*

Breeds Dec 1 to Aug 31

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

<https://ecos.fws.gov/ecp/species/1626>

Pinyon Jay *Gymnorhinus cyanocephalus*

Breeds Feb 15 to Jul 15

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/9420>

Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is $0.25/0.25 = 1$; at week 20 it is $0.05/0.25 = 0.2$.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

Breeding Season (■)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

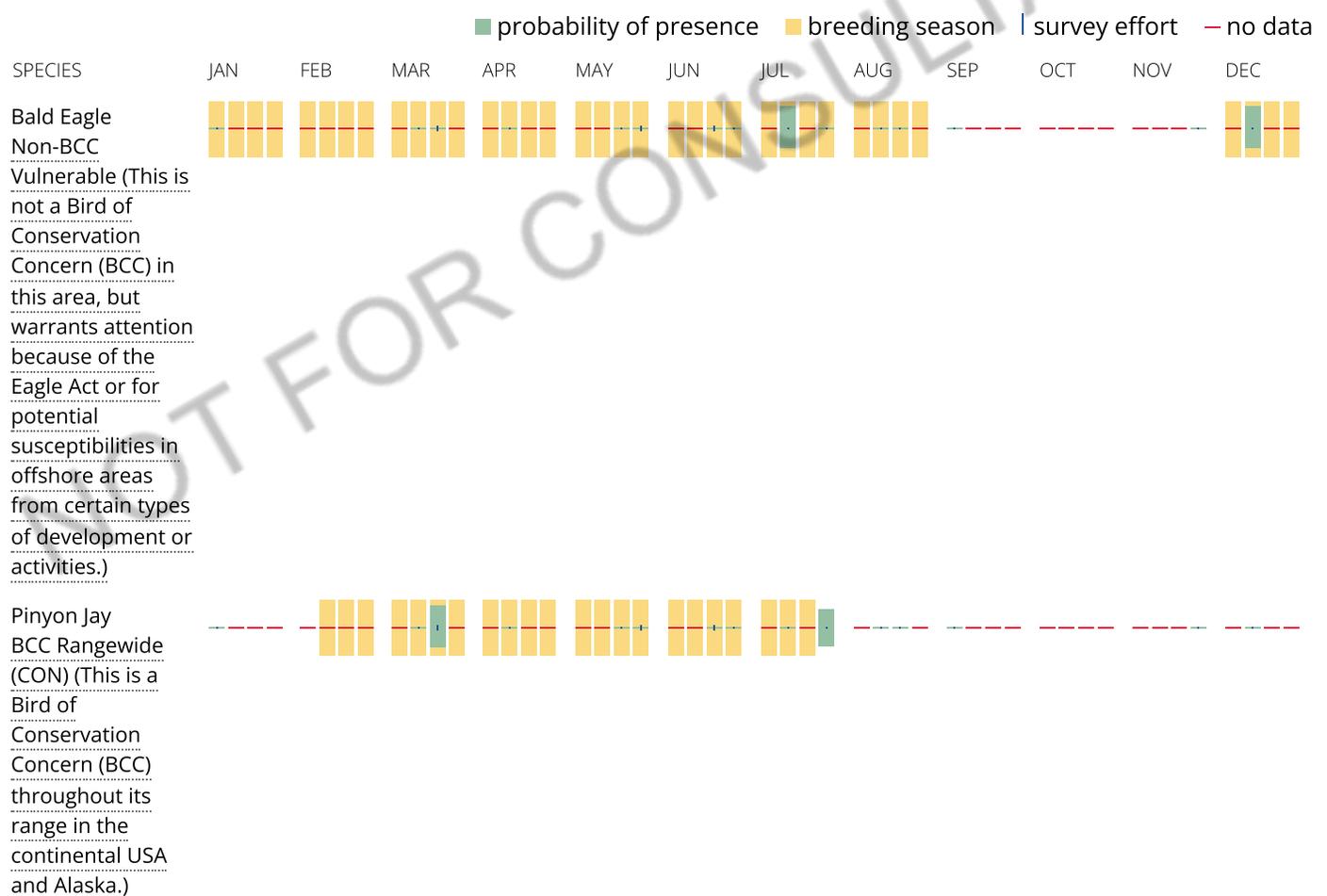
To see a bar's survey effort range, simply hover your mouse cursor over the bar.

No Data (—)

A week is marked as having no data if there were no survey events for that week.

Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and

avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. [Additional measures](#) or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the migratory birds potentially occurring in my specified location?

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [AKN Phenology Tool](#).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: [The Cornell Lab of Ornithology All About Birds Bird Guide](#), or (if you are unsuccessful in locating the bird of interest there), the [Cornell Lab of Ornithology Neotropical Birds guide](#). If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern \(BCC\)](#) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

Facilities

Wildlife refuges and fish hatcheries

REFUGE AND FISH HATCHERY INFORMATION IS NOT AVAILABLE AT THIS TIME

Wetlands in the National Wetlands Inventory

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

This location overlaps the following wetlands:

FRESHWATER POND

[PUSC](#)

RIVERINE

[R4SBCx](#)

[R4SBJ](#)

[R4SBA](#)

A full description for each wetland code can be found at the [National Wetlands Inventory website](#)

Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tubercid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this

inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

NOT FOR CONSULTATION



STEVE SISOLAK
Governor

STATE OF NEVADA

DEPARTMENT OF WILDLIFE

6980 Sierra Center Parkway, Suite 120

Reno, Nevada 89511

Phone (775) 688-1500 • Fax (775) 688-1595

TONY WASLEY
Director

BONNIE LONG
Deputy Director

JACK ROBB
Deputy Director

Alaina Russky
GIS Technician
Resource Concepts INC
340 N Minnesota St
Carson City, Nevada 89703

March 1, 2022

Re: Sierra High Farms

Dear Alaina Russky:

I am responding to your request for information from the Nevada Department of Wildlife (NDOW) on the known or potential occurrence of wildlife resources in the vicinity of the Sierra High Farms located in Douglas County, Nevada. In order to fulfill your request, an analysis was performed using the best available data from the NDOW's wildlife occurrences, raptor nest sites and ranges, greater sage-grouse leks and habitat, and big game distributions databases. No warranty is made by the NDOW as to the accuracy, reliability, or completeness of the data for individual use or aggregate use with other data. These data should be considered **sensitive** and may contain information regarding the location of sensitive wildlife species or resources. All appropriate measures should be taken to ensure that the use of this data is strictly limited to serve the needs of the project described on your GIS Data Request Form. Abuse of this information has the potential to adversely affect the existing ecological status of Nevada's wildlife resources and could be cause for the denial of future data requests.

To adequately provide wildlife resource information in the vicinity of the proposed project the NDOW delineated an area of interest that included a four-mile buffer around the project area provided by you on Monday, March 28, 2022. Wildlife resource data was queried from the NDOW databases based on this area of interest. The results of this analysis are summarized below.

Big Game - Occupied mule deer distribution exists within portions of the project area and four-mile buffer area. No known occupied bighorn sheep, elk, or pronghorn antelope distributions exist in the vicinity of the project area. Please refer to the attached maps for details regarding big game distributions relative to the proposed project area.

Greater Sage-Grouse - Habitat for the greater sage-grouse Bi-State distinct population segment exists throughout the entire project area and portions of the four-mile buffer area. Please refer to the attached map for details regarding greater sage-grouse habitat relative to the proposed project area. There are no known radio-marked greater sage-grouse tracking locations in the vicinity of the project area. There are no known greater sage-grouse lek sites in the vicinity of the project area.

Lahontan Cutthroat Trout - are known to exist in the vicinity of the project area in the Middle West Walker River watershed.

Raptors - Various species of raptors, which use diverse habitat types, may reside in the vicinity of the project area. American kestrel, bald eagle, barn owl, burrowing owl, Cooper's hawk, ferruginous hawk, flammulated owl, golden eagle, great horned owl, long-eared owl, merlin, northern goshawk, northern harrier, northern pygmy owl, northern saw-whet owl, osprey, peregrine falcon, red-tailed hawk, rough-legged hawk, sharp-shinned hawk, short-eared owl, Swainson's hawk, turkey vulture, and western screech owl have distribution ranges that include the project area and four-mile buffer area. Furthermore, bald eagle, Cooper's hawk, and prairie falcon have been directly observed in the vicinity of the project

area.

Raptor species are protected by State and Federal laws. In addition, bald eagle, burrowing owl, California spotted owl, ferruginous hawk, flammulated owl, golden eagle, northern goshawk, peregrine falcon, prairie falcon, and short-eared owl are NDOW species of special concern and are target species for conservation as outlined by the Nevada Wildlife Action Plan. Per the *Interim Golden Eagle Technical Guidance: Inventory and Monitoring Protocols; and Other Recommendations in Support of Golden Eagle Management and Permit Issuance* (United States Fish and Wildlife Service 2010) we have queried our raptor nest database to include raptor nest sites within ten miles of the proposed project area. There are two known raptor nest sites within ten miles of the project area:

Last Active	Last Check	Township/Range/Section	Probable Use
	4/22/1976		eagle
	5/10/1977		eagle

Other Wildlife Resources

There are no water developments in the vicinity of the project area. The following species have also been observed in the vicinity of the project area:

Common Name	ESA	State	SWAP SoCP
mountain lion			

ESA: Endangered Species Act Status

State: State of Nevada Special Status

SWAP SoCP: Nevada State Wildlife Action Plan (2012) Species of Conservation Priority

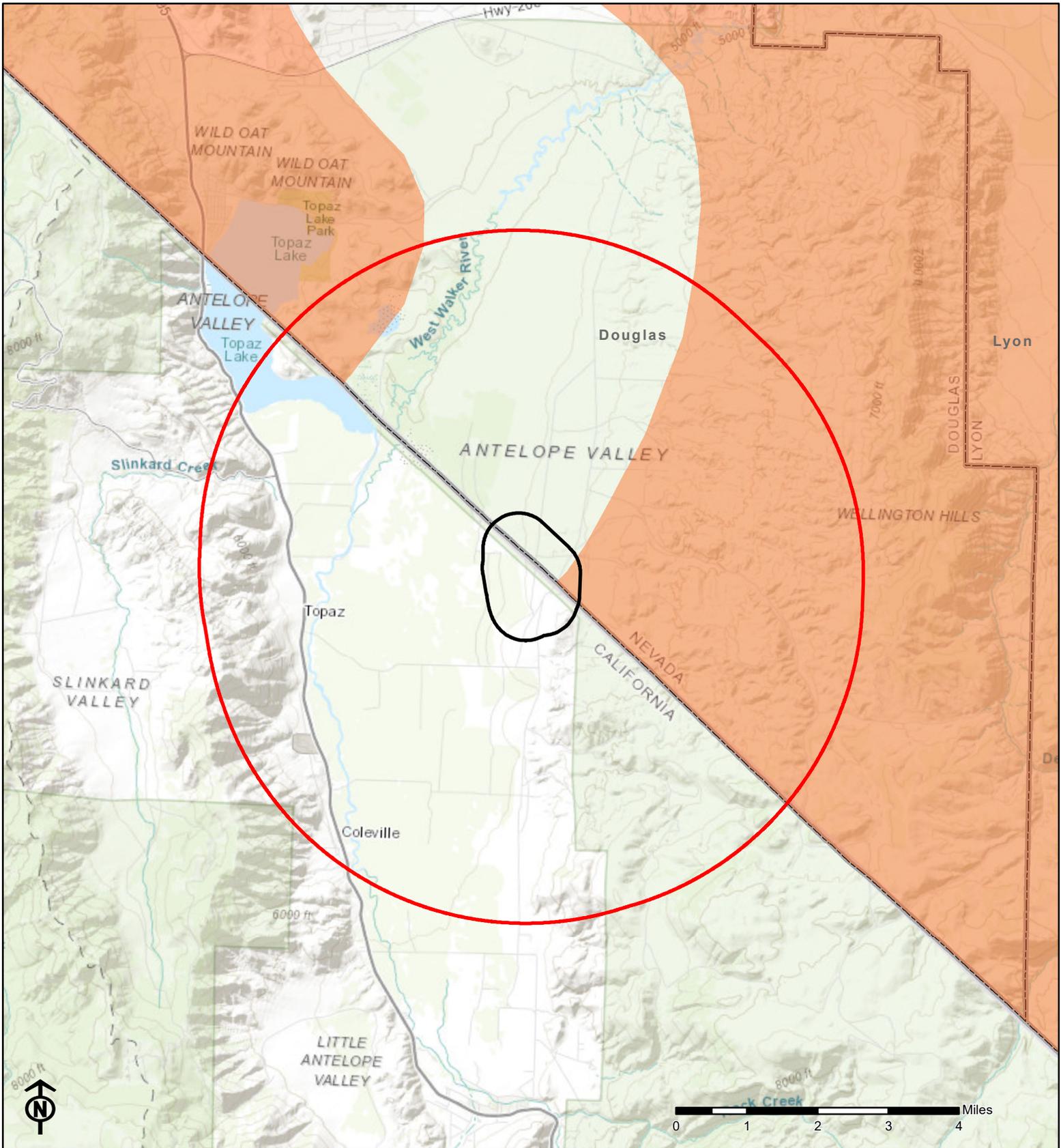
The proposed project area may also be in the vicinity of abandoned mine workings, which often provide habitat for state and federally protected wildlife, especially bat species, many of which are protected under NAC 503.030. To request data regarding known abandoned mine workings in the vicinity of the project area please contact the Nevada Division of Minerals (<http://minerals.state.nv.us/>).

The above information is based on data stored at our Reno Headquarters Office and does not necessarily incorporate the most up to date wildlife resource information collected in the field. Please contact the Habitat Division Supervising Biologist at our to discuss the current environmental conditions for your project area and the interpretation of our analysis. Furthermore, it should be noted that the information detailed above is preliminary in nature and not necessarily an identification of every wildlife resource concern associated with the proposed project. Consultation with the Supervising Habitat biologist will facilitate the development of appropriate survey protocols and avoidance or mitigation measures that may be required to address potential impacts to wildlife resources.

Katie Andrie - Western Region Supervising Habitat Biologist (775.688.1145)

Federally listed Threatened and Endangered species are also under the jurisdiction of the United States Fish and Wildlife Service. Please contact them for more information regarding these species.

If you have any questions regarding the results or methodology of this analysis, please do not hesitate to contact Jinna Larkin at (775) 688-1580.



-  Project Area
-  Four Mile Buffer Area Boundary
-  Mule Deer Distribution

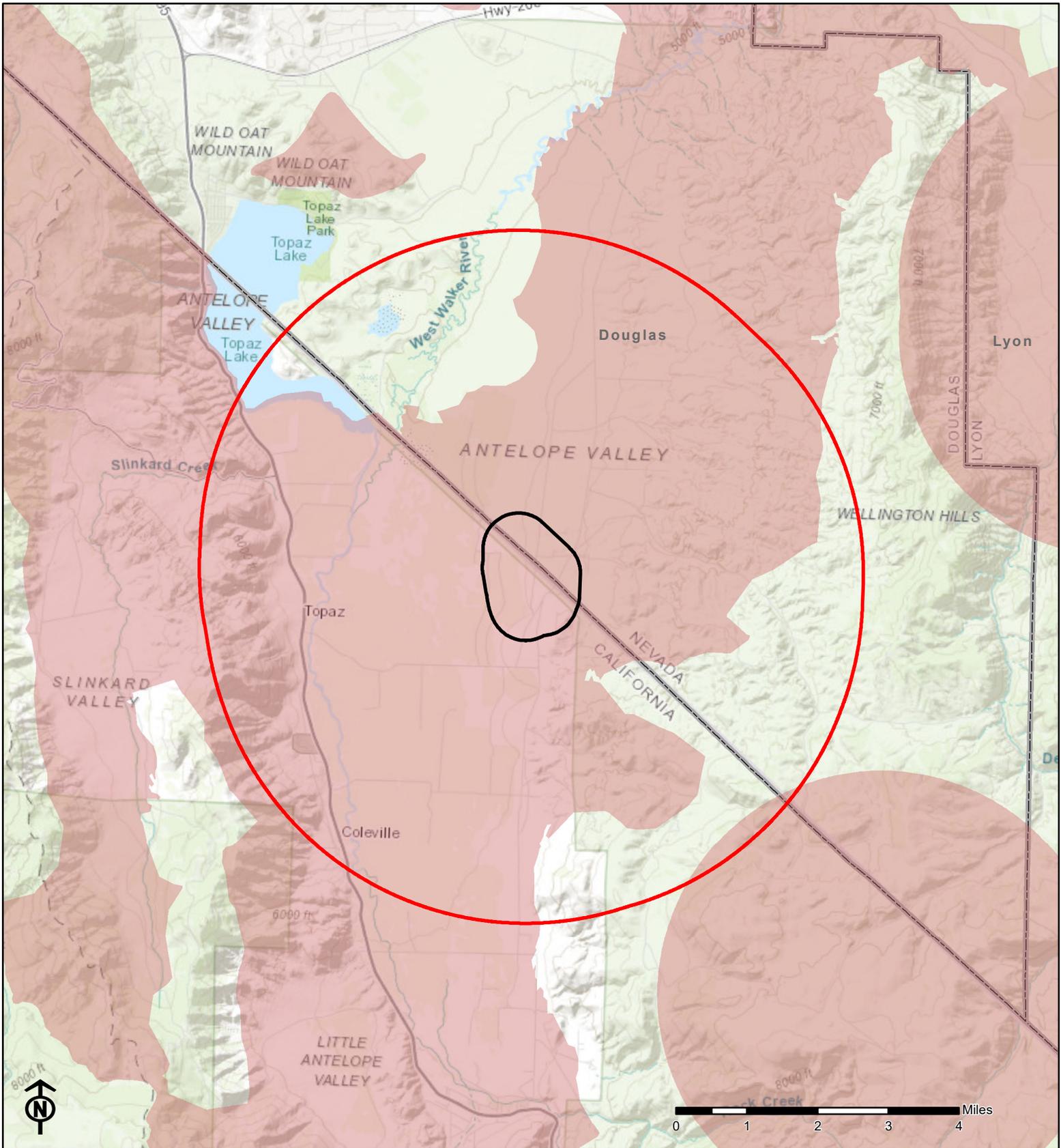
Sierra High Farms Mule Deer Distribution

March 01, 2022

Projection: UTM Zone 11 North, NAD83

No warranty is made by the Nevada Department of Wildlife as to the accuracy, reliability, or completeness of the data for individual use or aggregate use with other data.





-  Project Area
-  Four Mile Buffer Area Boundary
-  Priority Habitat
-  General Habitat
-  Other Habitat
-  Bi-State Habitat

Sierra High Farms Greater Sage-Grouse Habitat

March 01, 2022

Projection: UTM Zone 11 North, NAD83

No warranty is made by the Nevada Department of Wildlife as to the accuracy, reliability, or completeness of the data for individual use or aggregate use with other data.



Appendix C

Class III Archaeological Inventory for the Proposed Sierra High
Farms Cannabis Cultivation Project

April 21, 2022

**Class III Archaeological Inventory for the Proposed
Chichewa/Sierra High Farms Cannabis Cultivation Project,
Mono County, California (APN 001-150-004)**

Prepared By:
Michael Drews
Project Archaeologist

Submitted To:
Resource Concepts, Inc

Mono County Community Development Department
P.O. Box 8
Bridgeport, California 93517

Great Basin Consulting Group, LLC Project Number: 2022-100

April 21, 2022



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ADMINISTRATIVE SUMMARY

On March 30, 2022, Michael Drews from Great Basin Consulting Group, LLC, completed a Class III Archaeological Inventory for the proposed Chichewa/Sierra High Farms Cannabis Cultivation Project in Mono County, California (APN 001-150-004). The inventory was conducted to meet California Environmental Quality Act (CEQA) and AB 52 requirements.

APN 001-150-004 covers approximately 123.63 acres. The proposed project includes one 4,000 square foot building for cultivation and processing with 400 square foot of canopy area, four 8,000 square foot buildings for cultivation and processing each with 2,500 square foot of canopy area and employee restrooms, a 2,500 square foot maintenance shop, an outdoor cultivation area not exceeding 10 acres, four storage containers, and a 2,100 square foot drying shed. The inventory covered approximately 18 acres within the northern portion of the parcel where all development is proposed.

A single horseshoe was identified during the inventory. No other cultural materials are present within the 18-acre surveyed area. The isolated artifact is not eligible to the National Register of Historic Places or the California Register of Historic Places and is not considered significant by local ordinance or resolution. A finding of No Historic Properties Effects is recommended.

Project Number: 2022-100 **Date of Field Operations:** March 30, 2022

Organization/Field Personnel: Michael Drews (Project Archaeologist),

County: Mono County

Legal Description: E½, NE ¼; Section 16, T. 9N. R.23E. MDMB

Ownership: Private

Project Area: 18 acres / 7.28 hectares

Map Reference: Long Dry Canyon, Ca. USGS 7.5 Minute Series 1994

Inventory Date(s): March 30, 2022

Inventory Type: Class III Intensive Archaeological Inventory

PROJECT DESCRIPTION

Project Name and Description

Class III Archaeological Inventory for the Proposed Chichewa/Sierra High Farms Cannabis Cultivation Project, Mono County, California (APN 001-150-004). Chichewa/Sierra High Farms proposes to construct a cannabis cultivation project on a portion of APN 001-150-004 west of Topaz, California near the Nevada border in northwestern Mono County.

Sierra High Farms is an adult/medical cannabis production and distribution facility. Product will be grown both indoor and outdoor. The indoor cultivation portion of the project will operate under a California Micro-business license issued by the DCC (Bureau of Cannabis Control) and will consist of cultivation, distribution, and non-storefront retail.

The outdoor portion will operate on a cultivator's license issued by the DCC. The property has the land use designation AG10 on which cannabis activities are allowed subject to a use permit and operation permit approved by Mono County.

The project site consists of approximately three (3) acres of site improvements for indoor cultivation use including greenhouses, lab, nursery, maintenance shop building, driveways, parking, and on-site wastewater treatment system. Components include:

- Four (4) 8,000 square-foot greenhouses (80' by 100') \ (up to 10,500 sq ft indoor mature plant canopy)
- One cultivation lab (4,200 sq ft, 60' by 70')
- One maintenance shop (2,400 sq ft, 40' by 60')
- One drying shed (2,100 sq ft, 35' by 65')
- One nursery and processing building (5,000 sq ft, 50' by 100')
- One well pump house 150 sq ft (10x15')
- Water tank house (need dimensions)
- Three water storage tanks (5,000 gallons).

The outdoor cultivation area covers ten (10) acres and includes:

- Ten (10) acres of outdoor cannabis cultivation area including hoop house structures
- Four storage containers of approximately 8 x 40' for outdoor cultivation tools and storage use.

The cultural resources inventory covered approximately 18 acres within the northern portion of the parcel where indoor and outdoor development is proposed. Access is via existing road. All staging will be confined to the development footprint.

In compliance with CEQA (Public Resources Code 2100 et seq.) and sections pertaining to historic resources (PRC 5024, PRC 5025(f), PRC 5024.1, PRC 5025.5) Great Basin Consulting Group, LLC was contracted by Resource Concepts Inc. (RCI) to complete a Class III archaeological inventory within the project area.

APN 001-150-004 is located near the town of Topaz, just south of Topaz Lake along the west side of Antelope Valley in northern Mono County (Figure 1). Antelope Valley is a 3.5 mile wide by 15 mile long alluvial plain drained by the West Walker River. The river flows northward through the valley eventually emptying into Walker Lake. The West Walker River Canyon marks the southern boundary of Antelope Valley while Topaz Lake, an agricultural reservoir and the Pine Nut Mountains lie at the northern edge of the valley. Step faults along the eastern edge of the Sierra Nevada define the western edge of Antelope Valley, the Sweetwater Mountains and Wellington Hills define the valley's eastern boundary. Vegetation in the area is typical of the Great Basin. Pinon and juniper occur in the surrounding mountains, sage and buckbrush dominate the mountain pediment and non-agricultural lands along the valley bottom. Agricultural fields characterize most of the valley floor (Figure 2). Small residential parcels on lots of 1 to 5 acres occur along US 395. Scattered cottonwoods and willows occur along ditches and as shade trees or windbreaks at farmsteads.

The project area lies along the east side of the valley and abuts the Nevada State Line. Access to the parcel is via Eastside Road and a road following the state line. Most of the parcel is covered by scattered sagebrush and crossed by existing roads. The parcel covers approximately 128 acres, of which only the northern 18 acres are proposed for development (Figure 3). Agricultural fields lie just west of the property. The area proposed for development has been disturbed by brush clearing, leaving only about 5.25 acres of undisturbed land.

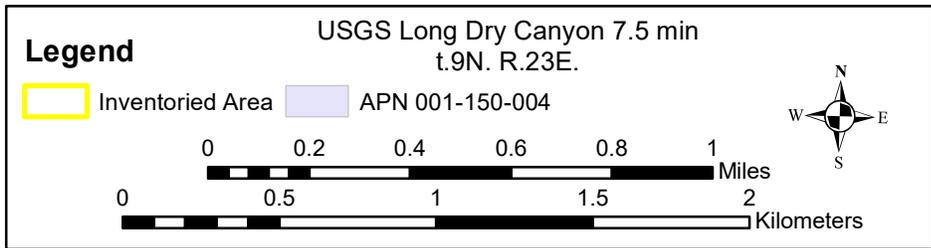
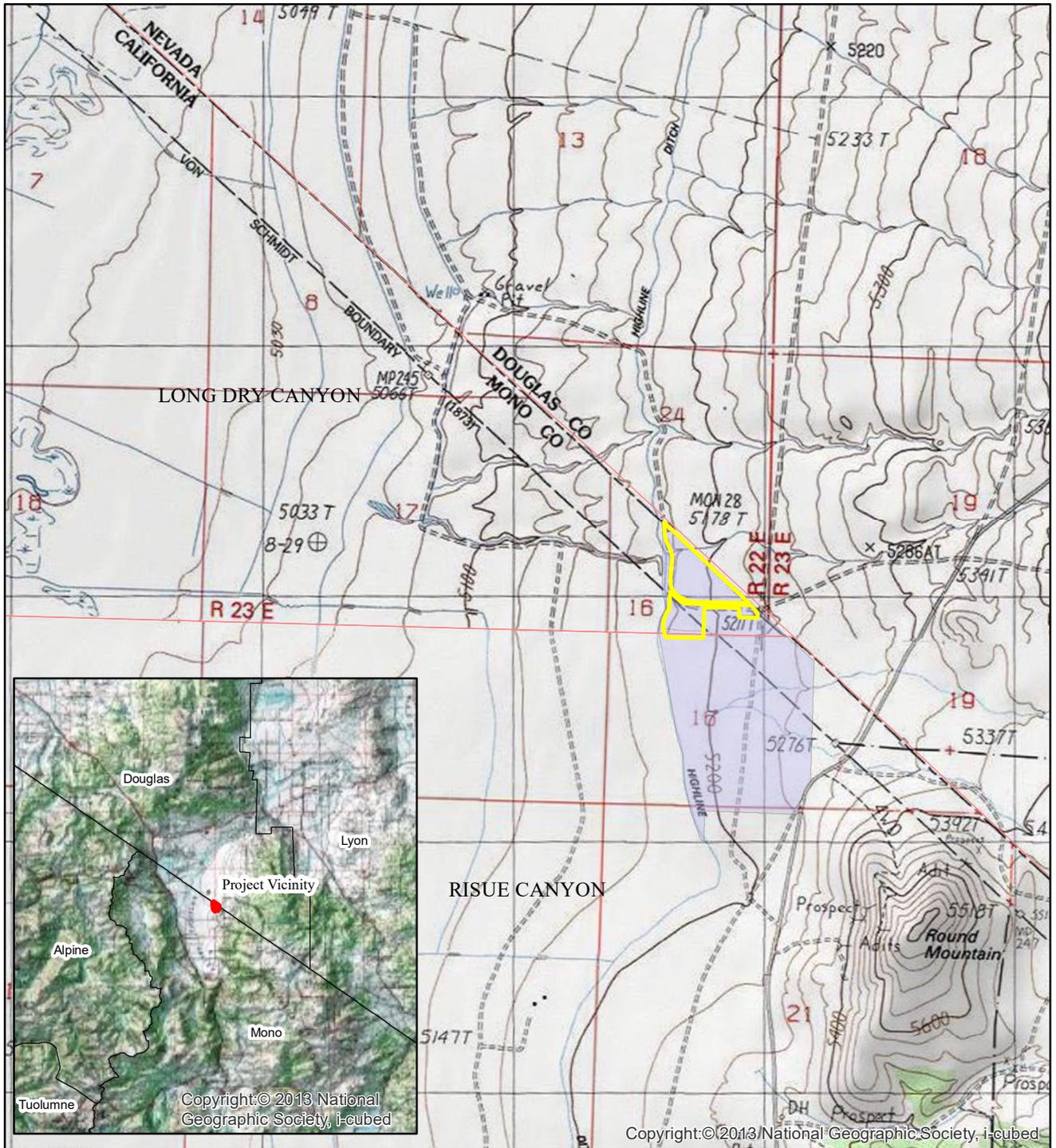


Figure 1. Sierra High Farms Project Location

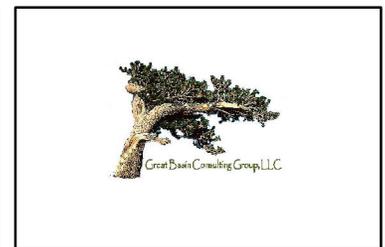
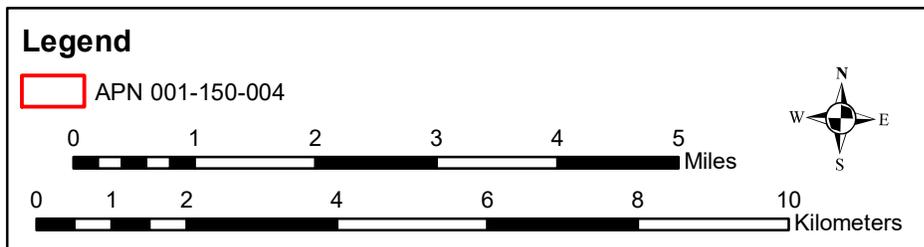


Figure 2. Sierra High Farms Project Vicinity.

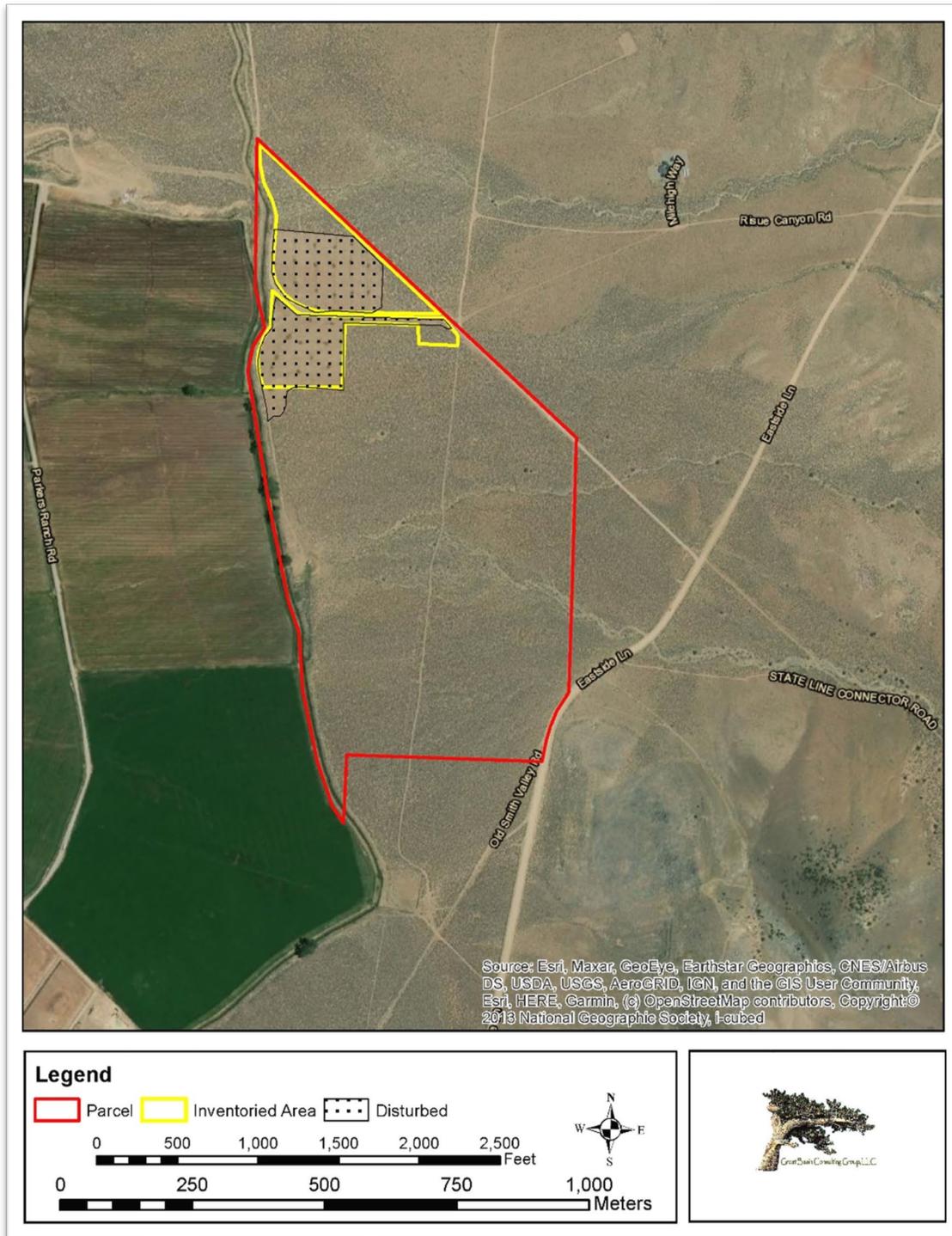


Figure 3. Sierra High Farms Project Area.

RESEARCH METHODS

Archival Review

Prior to the field visit, pertinent site records and documentation was requested of the California Historic Resource Information System, Eastern Information Center (EIC) and records available in the Nevada Cultural Resources Information System (NVCRIS) were consulted. The request included documentation of existing resources, reports, historic properties, determinations of eligibility, properties listed on the California Inventory of Historical Resources (1976), and any historic maps and local inventories within a ½ mile buffer of the project area.

On March 24, 2022, EIC responded to the records search request (Appendix 1). They indicate that no cultural resource inventories or cultural resources have been recorded within one-half mile of the project parcel. A search of NVCRIS shows one inventory (*A Cultural Resources Survey Report for Enhancement of Operations and Training Proficiency at Marine Corps Mountain Warfare Training Center, Mono County, California, and Douglas County, Lyon County, and Mineral County, Nevada* 19824/R2009041701936) and one cultural resource located along Eastside Road within the one-half mile record search extent. 26Ly1698/USFS04170208392 comprises remains of the Double Springs – Desert Creek Toll Road/Risue Canyon Road. According to the site record:

Risue Canyon Road is the western part of an 1860s toll road that began at Double Springs north of Wellington and continued south along the east side of Antelope Valley (approximating the 1850s route of the Walker River-Sonora Road) to cross through a steep canyon and east to link with Dickenson's Toll Road at Desert Creek (Maule 1938). The 1864 franchise for this toll road was issued to Thomas Rissue. It appears that Rissue hoped to develop a shortcut between the west and east forks of the Walker River, allowing traffic and freight from Antelope Valley to access Aurora in less time than by traveling further south. The toll station for this road was most likely located at Rissue's bridge crossing (of the West Walker River) 1.5 mi. south of the bridge at Hoye, and several waystations would also have been located near water sources along the route. However, little else is known about this toll route - the "canyon" portion of Rissue's road may have never been built to more than a pack trail width, or the road may have later deteriorated to a condition only fit for pack trains. Sometime in the early twentieth century, Risue Canyon Road was re-opened and improved for automobile use in conjunction with 1920s-1930s mining activities through the canyon.

The road currently functions as a maintained road and is not considered eligible to the National Register of Historic Places.

No constructed features are shown in the project vicinity on the 1874 General Land Office Rectangular Survey Plat for Township 9 North, Range 23 East. Roads currently crossing the project parcel are depicted on the 1956 Desert Creek Peak 15 minute map.

Field Methods

The project area was visited on March 30, 2022 by Michael Drews, Principal Investigator at Great Basin Consulting Group, LLC. The project area was walked utilizing transects spaced 15 meters apart. Photographs were taken at corners of the 18 acre project area and photo points mapped utilizing a Spectra Precision SP 20 GPS receiver capable of sub-meter accuracy. The tree row and site integrity was assessed.

Historical Overview

Mono County was created in 1861 from parts of Calaveras, Fresno and Mariposa Counties. Bridgeport, located 38 miles south of the project area serves as the County seat. The community of Topaz developed within the holdings of T.B. Rickey whose family began homesteading land along the West Walker River as early as 1859. The Topaz Post Office opened on the Rickey Ranch in 1885.

A January 29, 2007 article in The Record Courier (Douglas County, Nevada) contained an informative biography of T.B. Rickey. Thomas Brinley Rickey was born on August 23, 1836 in Greenfield, Ohio. He was the oldest of eleven children born to William and Liza Rickey. In 1852, at the age of 16, he migrated with his parents and six siblings from Dubuque, Iowa in search for a better life. The family settled first in the Amador County town of Volcano, then in the Ione Valley. Four additional children were born in California.

Rickey tried his hand at gold mining, quickly investing his earnings in land and cattle. In 1859, at the age of 23, Rickey drove a small herd over the Sierra Nevada into Antelope Valley. Here he established a homestead along the west side of the Walker River where he supplied beef to miners on the Comstock Lode and surrounding mines. His father William and the remainder of his family soon followed establishing homesteads along the west fork of the Walker River.

Rickey met and married Jane Caroline Jennie Gillis, the daughter of Charles Gillis, an early Genoa, Nevada pioneer and stage operator, on July 18, 1863. They had four children, all were born in Antelope Valley. Caroline M. Rickey was born in 1865, Charles William Rickey was born in 1867, Helen Nellie was born in 1869, but died of typhoid fever in 1904, and Bertha (Birdita) Lavina was born in 1871.

In 1876, Rickey partnered with Richard Kirman, a wealthy Reno banker and together they began acquiring homesteads and ranches throughout Antelope Valley. Soon, most of the valley from the mouth of the Walker River to the Pine Nut Range was under control of the Rickey Family. Eventually, the Rickey Family in partnership with Kirman came to own not only large portions of Mono County, but major portions of Owens Valley and parcels extending as far north as the Oregon Border.

Richard Kirman died in 1896 and on October 18, 1897, T.B. Rickey purchased their joint holdings from Elizabeth Kirman, including all of Section 24, T.9N. R.22E. for \$60,000 (Mono County Deeds, Book M, Page 601). Legal descriptions for all of the parcels transferred by the sale comprise ten pages in the Mono County Book of Deeds. Those properties were sold by T.B. Rickey to the Rickey Land and Cattle Company for \$85,000 in 1902.

Present-day Topaz Lane, in Mono County, was the site of the ranch's headquarters. The ranch, its main house, out-buildings, barns and corrals, sprawled in many directions. It was described as a paradise by many. The boarding house was built in 1888, also used as a hotel, it housed some of the 400 employees reported to have worked on the massive holdings of the Kirman & Rickey Cattle Company. The L-shaped building had two huge dining rooms, one for ranch employees and a kitchen attended by a Chinese cook. There were ice and store houses and even a house for the bookkeeper, Albert Bird, who was the accountant for the Rickey holdings in 1898. There was a post office, general store and a saloon, an important amenity for the time, as everyone drank and gambled in those days.

The heading of the Kirman and Rickey stationary read as follows: "Dealers in General Merchandise, dry goods, hats, caps, boots, shoes, harness, saddles, bridles, spurs, riatas, chaperejos, etc., hardware, wagons, agricultural implements and machinery-paints, oils and brushes-and a full line of goods usually kept in a first class general store". The post office was first established on the main complex in 1885 with Walter Swart as its first post master. A school was established prior to 1890, a jail and a full-

service blacksmith shop, the Rickey Ranch at Topaz was a small town unto itself. (Record Courier January 29, 2007)

In 1891, Rickey's wife Jeannie died and he married his one-time housekeeper Alice Belle Gleason Straub Crowell in 1893. The marriage, and rumors of an affair with Alice prior to Jennie's demise, alienated his children from his first marriage. In 1898, at the age of 61, Rickey and Alice, now 39 had a daughter they named Alice Brinley Rickey. They had taken up residence in Carson City on Mountain Street, and in 1907 sold an adjacent parcel that was to become the Nevada Governor's Mansion for \$10.

A plan to increase the size of Alkali Lake to irrigate lands downstream in Mason and Smith Valleys at the beginning of the 20th century created a fierce water war between the Rickey's and Henry Miller, partner in the Miller & Lux Company. Miller & Lux were headquartered in the San Joaquin Valley and had numerous holdings in California and Nevada, including ranches with irrigation rights in the Mason and Smith valleys. Miller was concerned that Rickey was removing too much Walker River water for irrigation and filed suit in federal court. Rickey claimed riparian water rights to all the water on the California side of both east and west forks of the Walker River and that Nevada users were entitled only to the water that he didn't use.

Rickey's case was based upon a previous victory by Miller and Lux (*Lux v. Haggin*); a decree that stated the riparian owner above does not have to be concerned with downstream water users. A special referee was appointed to hear the case, and Miller was joined by 160 other defendants. The hearing proceeded through the U.S. Circuit Court, Circuit Court of Appeals, and finally to the US Supreme Court where it was decided in favor of Henry Miller (*Miller et Lux v. Rickey*). Miller and Lux eventually completed the reservoir project creating the present day Topaz Lake.

The loss of the water wars was the beginning of the Rickey empire demise. In addition to his land and cattle holdings, Rickey speculated in mining and banking ventures.

Rickey is president of the State Bank and Trust Company of Nevada, the Goldfield Consolidated Water Company, the Homer Wilson Trust Company, which includes the old Sullivan Trust Company and other large interests throughout the state. He has founded a chain of banks through the state and

has erected the largest building in Southern Nevada, an immense five-story brick block on the main street of Tonopah, which is the home of the State Bank and Trust Company. He has extensive mining interests in many districts and is an owner of the Nevada-California Power Company (Beatty 1907).

The panic of 1897 brought failure to most Nevada Banks. Rickey, who used Nevada State Bank depositor's money to finance his cattle and mining enterprises was forced to close his banks and sell his vast holdings. In a paper transfer, the Antelope Valley properties listed in Book O, Page 80 of Mono County deeds was granted to his Antelope Valley Land and Cattle Company (Mono County Deeds, Book R, Page 333).

Through all the litigation and bank failures Rickey managed to retain enough money to purchase a home in Oakland, California where he died at age 84 on January 11, 1920. The remains of his ranch were managed by his grandson Charles Treadway Rickey.

INVENTORY RESULTS

A single steel horseshoe was located during the survey. It was located just south of the existing east/west road in the disturbed portion of the project area. The shoe is a plain, rolled bar with no caulks and nail fullering. It is 6 1/2 inches in diameter. The bar is 7/8 inch wide and 3/8 inch thick. Based upon its shape, it is a front, left shoe. No other artifacts were encountered during the inventory.

FINDINGS AND CONCLUSIONS

Findings

A single isolated horse shoe was located within the project area. No other cultural materials or archaeological sites were encountered. A record search by the Eastern California Information Center indicates that no site listed on the National Register of Historic Places, the California Register of Historical Resources, California Historical Landmarks or California Points of Historical Interest lie within the project area.

The single horseshoe is not associated with significant events (National Register Criterion A/California Register Criterion 1), important persons (National Register Criterion B/California Register Criterion 2). Under National Register Criterion C /California Register Criterion 3, a site can be considered significant if it: Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the Work of an Important Creative Individual or possesses High Artistic Values. Isolated artifacts are not considered significant under National Register Criterion C /California Register Criterion 3, and do they have the potential to yield information important to local, state or national prehistory or history (National Register Criterion D /California Register Criterion 4).

The isolated horseshoe is *not eligible* for inclusion in the National Register of Historic Places or the California Register of Historic Places and is not considered significant by local ordinance or resolution (Code 5020.1(k) and 5024.1(g)).:

Conclusions

On March 30, 2022 Michael Drews from Great Basin Consulting Group, LLC, visited a portion of APN 001-150-004 in order to identify extant cultural resources that may lie within a proposed 18 acre cannabis cultivation area. A single metal horseshoe was located on within the project area. No other cultural materials or archaeological sites were encountered. The isolated horseshoe is not eligible for inclusion in the National Register of Historic Places or the California Register of Historic Places. We recommend a finding of No Historic Properties effected for the proposed project.

The techniques and methods used during this investigation were such that most existing cultural material in the project area visible to surface examination has been identified. If historic properties are inadvertently discovered, reasonable efforts to avoid, minimize, or mitigate adverse effects to the property will be taken and the State Historic Preservation Officer (SHPO), Mono County Planning Department, and Indian tribes with concerns about the property, and the Advisory Council on Historic Preservation (Council) will be notified within 48 hours in compliance with 36 CFR 800.13 (b) (3).

BIBLIOGRAPHY

Mono County Recorder's Office, Bridgeport, California Book of Deeds

Record Courier

2007 Who's Got the Water?: The Story of Tom Rickey and Topaz Lake. January

U.S. Census 1880 to 1940 <http://ancestry.com>

APPENDIX 1
RECORD SEARCH RESULTS

CHRIS Data Request Form

ACCESS AND USE AGREEMENT NO.: _____ **IC FILE NO.:** _____

To: _____ Information Center

Print Name: _____ Date: _____

Affiliation: _____

Address: _____

City: _____ State: _____ Zip: _____

Phone: _____ Fax: _____ Email: _____

Billing Address (if different than above): _____

Project Name / Reference: _____

Project Street Address: _____

County: _____

Township/Range/UTMs: _____

USGS 7.5' Quad(s): _____

PRIORITY RESPONSE (Additional Fee): yes / no

TOTAL FEE NOT TO EXCEED: \$ _____

Special Instructions:

Information Center Use Only

Date of CHRIS Data Provided for this Request: _____

Confidential Data Included in Response: yes / no

Notes: _____

CHRIS Data Request Form

Include the following information (mark as necessary) for the records search area(s) shown on the attached map(s) or included in the associated shapefiles. Shapefiles are the current CHRIS standard format for digital spatial data products.

NOTE: All digital data products are subject to availability - check with the appropriate Information Center.

1. **Map Type Desired:** Digital map products will be provided only if they are available at the time of this request. *Regardless of what is requested, only hard copy hand-drawn maps will be provided for any part of the requested search area for which digital map products are not available at the time of this request. There is an additional charge for shapefiles, whether they are provided with or without Custom GIS Maps.*

Mark one map choice only

Custom GIS Maps Shapefiles Custom GIS Maps and Shapefiles Hard Copy Hand-Drawn Maps only

Any selection below left unmarked will be considered a "no."

2a.	Within project area	Within _____ radius
ARCHAEOLOGICAL Resource Locations⁺	yes / no	yes / no
NON-ARCHAEOLOGICAL Resource Locations	yes / no	yes / no
Report Locations⁺	yes / no	yes / no
Resource Database Printout* (list)	yes / no	yes / no
Resource Database Printout* (detail)	yes / no	yes / no
Resource Digital Database Records (spreadsheet)⁺	yes / no	yes / no
Report Database Printout* (list)	yes / no	yes / no
Report Database Printout* (detail)	yes / no	yes / no
Report Digital Database Records (spreadsheet)⁺	yes / no	yes / no
ARCHAEOLOGICAL Resource Record copies^{**}	yes / no	yes / no
PDF / Hard Copy		
NON-ARCHAEOLOGICAL Resource Record copies[*]	yes / no	yes / no
PDF / Hard Copy		
Report copies^{**}:	yes / no	yes / no
PDF / Hard Copy		
	Only directory listing	Associated documentation
OHP Historic Properties Directory^{**}		
within project area	yes / no	yes / no
within _____ mi radius	yes / no	yes / no
OHP Archaeological Determinations of Eligibility⁺		
within project area	yes / no	yes / no
within _____ mi radius	yes / no	yes / no
California Inventory of Historical Resources (1976):		
within project area	yes / no	yes / no
within _____ mi radius	yes / no	yes / no

+ In order to receive archaeological information, requestor must meet qualifications as specified in Section III of the current version of the California Historical Resources Information System Information Center Rules of Operation Manual and be identified as an Authorized User under an active CHRIS Access and Use Agreement.

* These documents may be supplied as PDF files, if available

** Includes, but is not limited to, information regarding National Register of Historic Places, California Register of Historical Resources, California State Historical Landmarks, California State Points of Historical Interest, and historic building surveys.

CHRIS Data Request Form

2b. Listed below are sources of additional information that may be available at the Information Center. Indicate if a review and documentation of any of the following types of information is requested.

Caltrans Bridge Survey	yes / no
Ethnographic Information	yes / no
Historical Literature	yes / no
Historical Maps	yes / no
Local Inventories	yes / no
GLO and/or Rancho Plat Maps	yes / no
Shipwreck Inventory	yes / no
Soil Survey Maps	yes / no

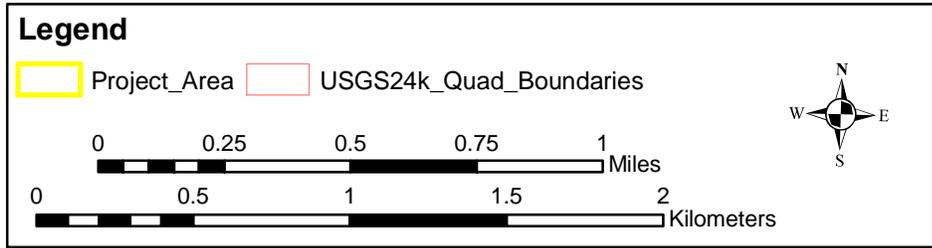
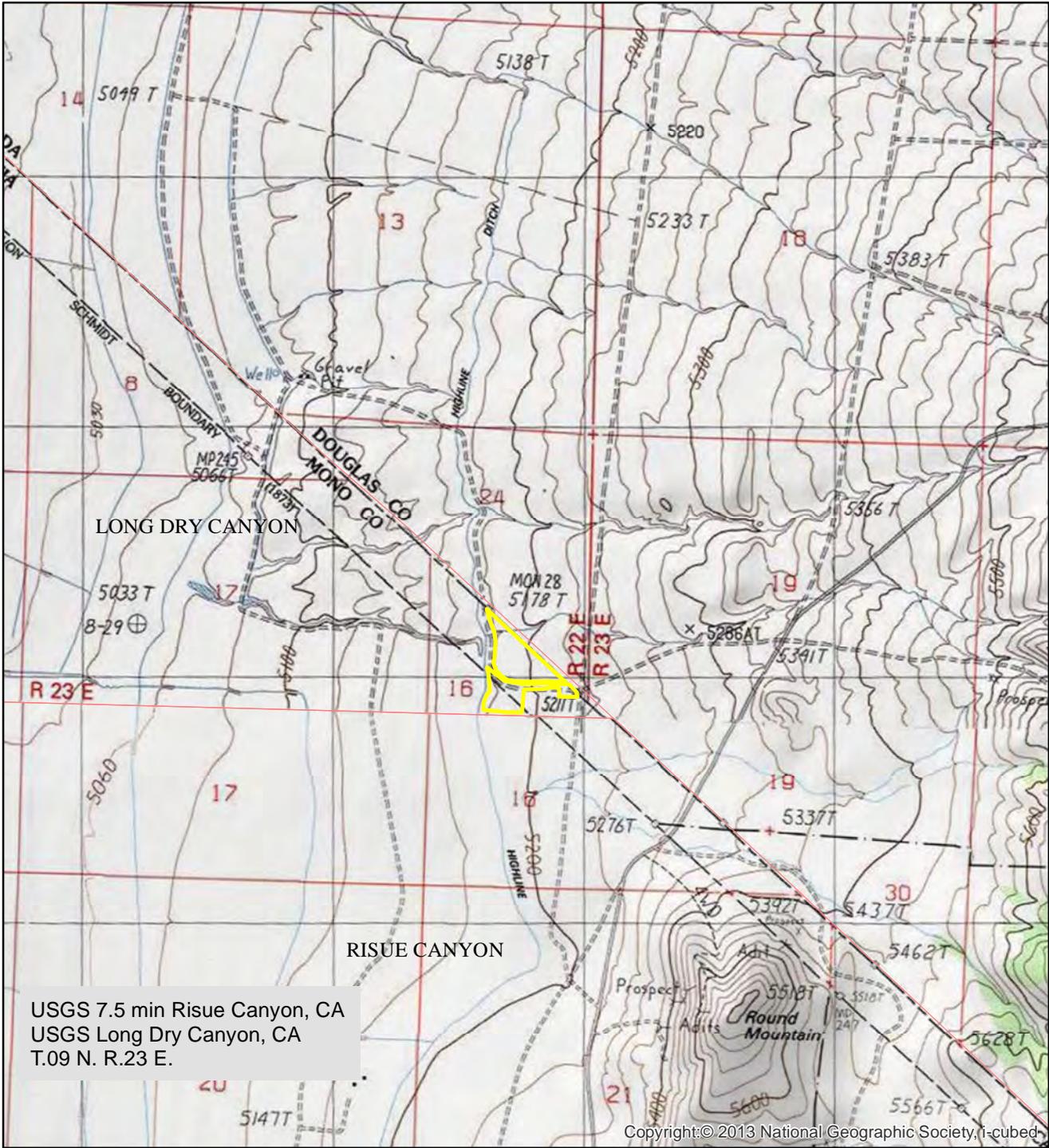


Figure 1. Project Location

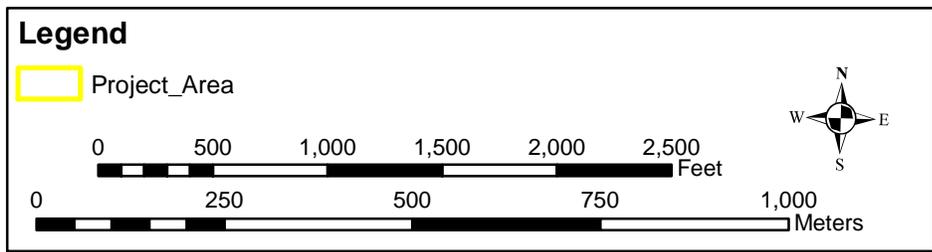
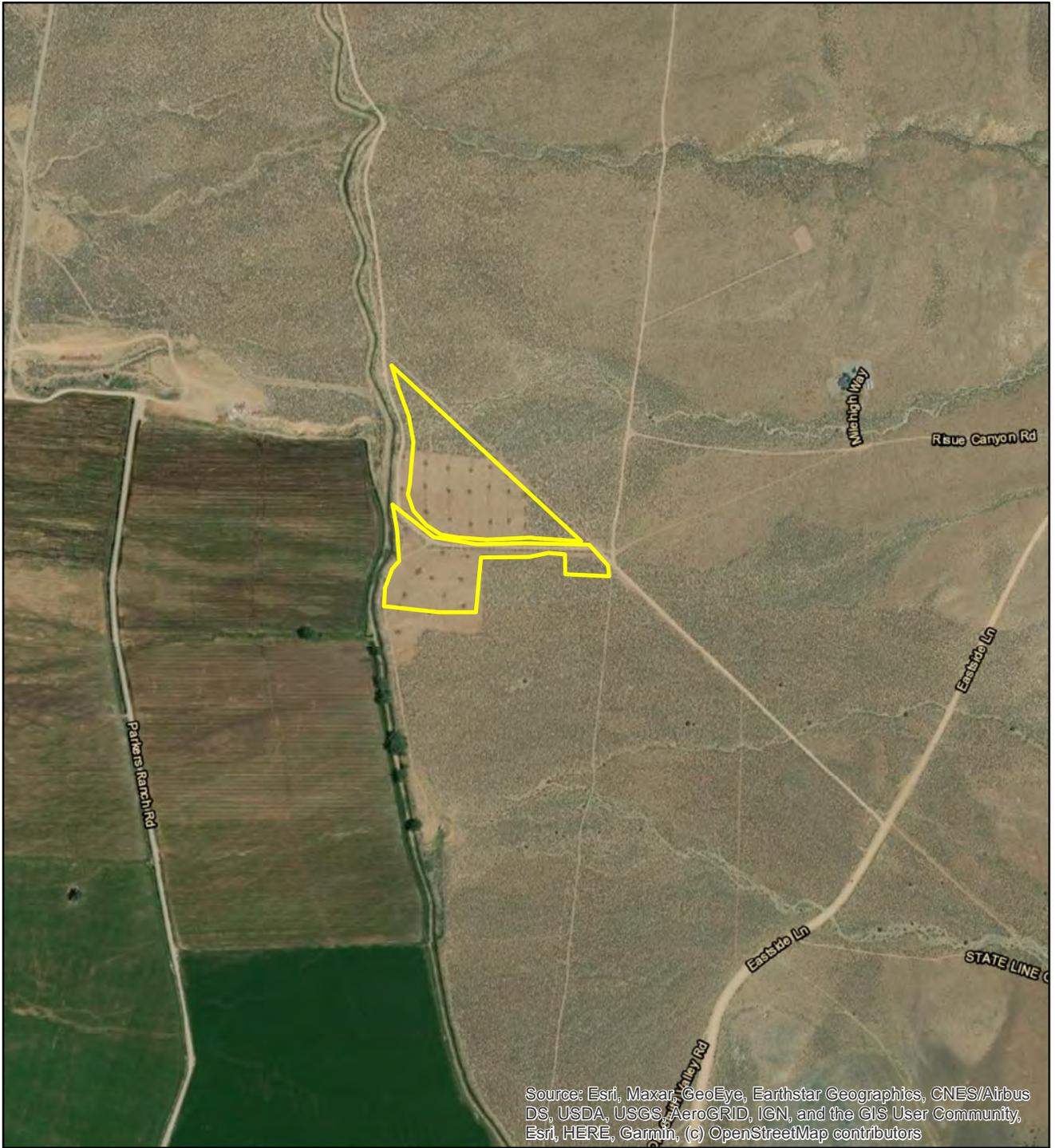


Figure 2. Project Area

Subject **Option B Results for the Sierra High Farms**
From eickw . <eickw@ucr.edu>
To Mike Drews <mdrews@greatbasingroup.com>
Date 2022-03-24 15:54



March 24, 2022
CHRIS Access and Use Agreement No.: 281
ST-MNO-6419

Michael Drews
Great Basin Consulting Group, LLC
200 Winters Drive
Carson City, NV 89703

Re: Cultural Resources Records Search for the Sierra High Farms Project

Dear Michael Drews:

We received your request on February 14, 2022, for a cultural resources records search for the Sierra High Farms project located in Section 16, T.9N, R.23, MDBM, in the state borderline between California and Nevada area in Mono County. We have reviewed our site records, maps, and manuscripts against the location map you provided.

Our records indicate that no cultural resources studies have been conducted within a half-mile radius of your project area.

Our records indicate that no cultural resources properties have been recorded within a half-mile radius of your project area.

Additional sources of information consulted are identified below.

National Register of Historic Places: no listed properties are located within the boundaries of the project area.

Office of Historic Preservation (OHP), Archaeological Determinations of Eligibility (ADOE): no listed properties are located within the boundaries of the project area.

Office of Historic Preservation (OHP), Built Environment Resources Directory (BERD): no listed properties are located within the boundaries of the project area.

Note: not all properties in the California Historical Resources Information System are listed in the OHP ADOE and BERD; the ADOE and BERD comprise lists of properties submitted to the OHP for review.

As the Information Center for Riverside, Inyo, and Mono Counties, it is necessary that we receive a copy of all cultural resources reports and site information pertaining to this county in order to maintain our map and manuscript files. Confidential information provided with this records search regarding the location of cultural resources outside the boundaries of your project area should not be included in reports addressing the project area.

Due to processing delays and other factors, not all of the historical resource reports and resource records that have been submitted to the Office of Historic Preservation are available via this records search. Additional information may be available through the federal, state, and local agencies that produced or paid for historical resource management work in the search area. Additionally, Native American tribes have historical resource information not in the California Historical Resources Information System (CHRIS) Inventory, and you should contact the California Native American Heritage Commission for information on local/regional tribal contacts.

The California Office of Historic Preservation (OHP) contracts with the California Historical Resources Information System's (CHRIS) regional Information Centers (ICs) to maintain information in the CHRIS inventory and make it available to local, state, and federal agencies, cultural resource professionals, Native American tribes, researchers, and the public. Recommendations made by the IC coordinators or their staff regarding the interpretation and application of this information are advisory only. Such recommendations do not necessarily represent the evaluation or opinion of the State Historic Preservation Officer in carrying out the OHP's regulatory authority under federal and state law.

Best,

Eastern Information Center
Watkins Hall Room 1313
c/o Department of Anthropology
University of California
900 University Avenue
Riverside, CA 92521-0418

"Maybe, it's not too late, to learn how to love, and forget how to hate..." Ozzy Osbourne

CORRESPONDENCE

NATIVE AMERICAN HERITAGE COMMISSION

March 2, 2022

Michael Draper
County of Mono

Via Email to: mdraper@mono.ca.gov

Re: Native American Tribal Consultation, Pursuant to the Assembly Bill 52 (AB 52), Amendments to the California Environmental Quality Act (CEQA) (Chapter 532, Statutes of 2014), Public Resources Code Sections 5097.94 (m), 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2 and 21084.3, Sierra High Farms - Use Permit Project, Mono County

Dear Mr. Draper:

Pursuant to Public Resources Code section 21080.3.1 (c), attached is a consultation list of tribes that are traditionally and culturally affiliated with the geographic area of the above-listed project. Please note that the intent of the AB 52 amendments to CEQA is to avoid and/or mitigate impacts to tribal cultural resources, (Pub. Resources Code §21084.3 (a)) ("Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.")

Public Resources Code sections 21080.3.1 and 21084.3(c) require CEQA lead agencies to consult with California Native American tribes that have requested notice from such agencies of proposed projects in the geographic area that are traditionally and culturally affiliated with the tribes on projects for which a Notice of Preparation or Notice of Negative Declaration or Mitigated Negative Declaration has been filed on or after July 1, 2015. Specifically, Public Resources Code section 21080.3.1 (d) provides:

Within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a project, the lead agency shall provide formal notification to the designated contact of, or a tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, which shall be accomplished by means of at least one written notification that includes a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation pursuant to this section.

The AB 52 amendments to CEQA law does not preclude initiating consultation with the tribes that are culturally and traditionally affiliated within your jurisdiction prior to receiving requests for notification of projects in the tribe's areas of traditional and cultural affiliation. The Native American Heritage Commission (NAHC) recommends, but does not require, early consultation as a best practice to ensure that lead agencies receive sufficient information about cultural resources in a project area to avoid damaging effects to tribal cultural resources.

The NAHC also recommends, but does not require that agencies should also include with their notification letters, information regarding any cultural resources assessment that has been completed on the area of potential effect (APE), such as:

1. The results of any record search that may have been conducted at an Information Center of the California Historical Resources Information System (CHRIS), including, but not limited to:



CHAIRPERSON
Laura Miranda
Luiseño

VICE CHAIRPERSON
Reginald Pagaling
Chumash

PARLIAMENTARIAN
Russell Attebery
Karuk

SECRETARY
Sara Dutschke
Miwok

COMMISSIONER
William Mungary
Paiute/White Mountain
Apache

COMMISSIONER
Isaac Bojorquez
Ohlone-Costanoan

COMMISSIONER
Buffy McQuillen
Yokayo Pomo, Yuki,
Nomlaki

COMMISSIONER
Wayne Nelson
Luiseño

COMMISSIONER
Stanley Rodriguez
Kumeyaay

EXECUTIVE SECRETARY
Christina Snider
Pomo

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

- A listing of any and all known cultural resources that have already been recorded on or adjacent to the APE, such as known archaeological sites;
- Copies of any and all cultural resource records and study reports that may have been provided by the Information Center as part of the records search response;
- Whether the records search indicates a low, moderate, or high probability that unrecorded cultural resources are located in the APE; and
- If a survey is recommended by the Information Center to determine whether previously unrecorded cultural resources are present.

2. The results of any archaeological inventory survey that was conducted, including:

- Any report that may contain site forms, site significance, and suggested mitigation measures.

All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure in accordance with Government Code section 6254.10.

3. The result of any Sacred Lands File (SLF) check conducted through the Native American Heritage Commission. The request form can be found at <http://nahc.ca.gov/wp-content/uploads/2015/08/Local-Government-Tribal-Consultation-List-Request-Form-Update.pdf>

4. Any ethnographic studies conducted for any area including all or part of the APE; and

5. Any geotechnical reports regarding all or part of the APE.

Lead agencies should be aware that records maintained by the NAHC and CHRIS are not exhaustive and a negative response to these searches does not preclude the existence of a tribal cultural resource. A tribe may be the only source of information regarding the existence of a tribal cultural resource.

This information will aid tribes in determining whether to request formal consultation. In the event that they do, having the information beforehand will help to facilitate the consultation process.

If you receive notification of change of addresses and phone numbers from tribes, please notify the NAHC. With your assistance, we can assure that our consultation list remains current.

If you have any questions, please contact me at my email address: Cameron.vela@nahc.ca.gov.

Sincerely,

Cameron Vela

Cameron Vela
Cultural Resources Analyst

Attachment

**Native American Heritage Commission
Tribal Consultation List
Mono County
3/2/2022**

**Utu Utu Gwaitu Tribe of the
Benton Paiute Reservation**

Tina Braitewaite, Chairperson
555 Yellow Jacket Road / 25669 Paiute
Hwy. 6, PMB 1
Benton, CA, 93512
Phone: (760) 933 - 2321
Fax: (760) 933-2412
t.braithwaite@bentonpaiutereservation.org

**Bridgeport Paiute Indian
Colony**

John Glazier, Chairperson
P.O. Box 37 Paiute
Bridgeport, CA, 93517
Phone: (760) 932 - 7083
Fax: (760) 932-7846
chair@bridgeportindiancolony.com

**Big Pine Paiute Tribe of the
Owens Valley**

James Rambeau, Chairperson
P. O. Box 700 Paiute-Shoshone
Big Pine, CA, 93513
Phone: (760) 938 - 2003
Fax: (760) 938-2942
j.rambeau@bigpinepaiute.org

Mono Lake Kutzadika Tribe

Charlotte Lange, Chairperson
P.O. Box 237 Mono
Lee Vining, CA, 93541 Paiute
Phone: (760) 709 - 1273
chair@monolaketribe.us

**Big Pine Paiute Tribe of Owens
Valley**

Sally Manning, Environmental
Director
P. O. Box 700 Paiute-Shoshone
Big Pine, CA, 93513
Phone: (760) 938 - 2003
s.manning@bigpinepaiute.org

Walker River Reservation

Melanie McFalls, Chairperson
P.O. Box 220 Northern Paiute
Schurz, NV, 89427
Phone: (775) 773 - 2306
Fax: (775) 773-2585

**Big Pine Paiute Tribe of the
Owens Valley**

Danelle Gutierrez, Tribal Historic
Preservation Officer
P.O. Box 700 Paiute-Shoshone
Big Pine, CA, 93513
Phone: (760) 938 - 2003
Fax: (760) 938-2942
d.gutierrez@bigpinepaiute.org

Bishop Paiute Tribe

Allen Summers, Chairperson
50 Tu Su Lane Paiute-Shoshone
Bishop, CA, 93514
Phone: (760) 873 - 3584
Fax: (760) 873-4143

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and section 5097.98 of the Public Resources Code.

This list is only applicable for consultation with Native American tribes under Public Resources Code Sections 21080.3.1 for the proposed Sierra High Farms - Use Permit Project, Mono County.



April 21, 2022

Mr. Darrel Cruz
Tribal Historic Preservation Officer
Washoe Tribe of Nevada and California
919 Highway 3995 North
Gardnerville, Nevada 89410

Subject: Invitation to Begin Informal Consultation for the Proposed Chichewa/Sierra High Farms Cannabis Cultivation Project, Mono County, California (APN 001-150-004)

Dear Mr. Cruz,

The purpose of this letter is to initiate informal consultation on the Proposed Chichewa/Sierra High Farms Cannabis Cultivation Project, Mono County, California (APN 001-150-004). Great Basin Consulting Group, LLC conducted a Class III reconnaissance survey for the proposed Chichewa/Sierra High Farms Cannabis Cultivation Project in Mono County, California (APN 001-150-004). The inventory was conducted to meet California Environmental Quality Act (CEQA) and AB 52 requirements. Formal Government to Government Consultation will be directed by Mono County.

Sierra High Farms is an adult/medical cannabis production and distribution facility. Product will be grown both indoor and outdoor. The indoor cultivation portion of the project will operate under a California Micro-business license issued by the DCC (Bureau of Cannabis Control) and will consist of cultivation, distribution, and non-storefront retail.

The outdoor portion will operate on a cultivator's license issued by the DCC. The property has the land use designation AG10 on which cannabis activities are allowed subject to a use permit and operation permit approved by Mono County.

The project site consists of approximately three (3) acres of site improvements for indoor cultivation use including greenhouses, lab, nursery, maintenance shop building, driveways, parking, and on-site wastewater treatment system. Components include:

- Four (4) 8,000 square-foot greenhouses (80' by 100') \ (up to 10,500 sq ft indoor mature plant canopy)
- One cultivation lab (4,200 sq ft, 60' by 70')
- One maintenance shop (2,400 sq ft, 40' by 60')
- One drying shed (2,100 sq ft, 35' by 65')
- One nursery and processing building (5,000 sq ft, 50' by 100')

- One well pump house 150 sq ft (10x15')
- Water tank house (need dimensions)
- Three water storage tanks (5,000 gallons).

The outdoor cultivation area covers ten (10) acres and includes:

- Ten (10) acres of outdoor cannabis cultivation area including hoop house structures
- Four storage containers of approximately 8 x 40' for outdoor cultivation tools and storage use.

The cultural resources inventory covered approximately 18 acres within the northern portion of the parcel where indoor and outdoor development is proposed. Access is via existing road. All staging will be confined to the development footprint.

In compliance with CEQA (Public Resources Code 2100 et seq.) and sections pertaining to historic resources (PRC 5024, PRC 5025(f), PRC 5024.1, PRC 5025.5) Great Basin Consulting Group, LLC was contracted by Resource Concepts Inc. (RCI) to complete a Class III archaeological inventory within the project area.

APN 001-150-004 is located near the town of Topaz, just south of Topaz Lake along the west side of Antelope Valley in northern Mono County (Figure 1). Antelope Valley is a 3.5 mile wide by 15 mile long alluvial plain drained by the West Walker River. The river flows northward through the valley eventually emptying into Walker Lake. The West Walker River Canyon marks the southern boundary of Antelope Valley while Topaz Lake, an agricultural reservoir and the Pine Nut Mountains lie at the northern edge of the valley. Step faults along the eastern edge of the Sierra Nevada define the western edge of Antelope Valley, the Sweetwater Mountains and Wellington Hills define the valley's eastern boundary. Vegetation in the area is typical of the Great Basin. Pinon and juniper occur in the surrounding mountains, sage and buckbrush dominate the mountain pediment and non-agricultural lands along the valley bottom. Agricultural fields characterize most of the valley floor (Figure 2). Small residential parcels on lots of 1 to 5 acres occur along US 395. Scattered cottonwoods and willows occur along ditches and as shade trees or windbreaks at farmsteads.

The project area lies along the east side of the valley and abuts the Nevada State Line. Access to the parcel is via Eastside Road and a road following the state line. Most of the parcel is covered by scattered sagebrush and crossed by existing roads. The parcel covers approximately 128 acres, of which only the northern 18 acres are proposed for development (Figure 3). Agricultural fields lie just west of the property. The area proposed for development has been disturbed by brush clearing, leaving only about 5.25 acres of undisturbed land.

Prior to the field visit, pertinent site records and documentation was requested of the California Historic Resource Information System, Eastern Information Center (EIC) and records available in the Nevada Cultural Resources Information System (NVCRIS) were consulted.

On March 24, 2022, EIC responded to the records search request (Appendix 1). They indicate that no cultural resource inventories or cultural resources have been recorded within one-half mile of the project parcel. A search of NVCRIS shows one inventory (*A Cultural Resources Survey Report for Enhancement of Operations and Training Proficiency at Marine Corps Mountain Warfare Training Center, Mono County, California, and Douglas County, Lyon County, and Mineral County, Nevada* 19824/R2009041701936) and one cultural resource located along Eastside Road within the one-half mile record search extent.

26Ly1698/USFS04170208392 comprises remains of the Double Springs – Desert Creek Toll Road/Risue Canyon Road.

No constructed features are shown in the project vicinity on the 1874 General Land Office Rectangular Survey Plat for Township 9 North, Range 23 East. Roads currently crossing the project parcel are depicted on the 1956 Desert Creek Peak 15-minute map.

A single steel horseshoe was identified within the inventoried portion of APN 001-150-004.

The project proponent understands the possibility that there may be resources of concern to the Washoe Tribe of Nevada and California within the initial study area for this project. It is the proponent's goal to avoid cultural resources if possible, so your assistance on this matter would be most welcome.

Great Basin Consulting Group, LLC, a consultant working with RCI to prepare a cultural report is contacting you to consult on this project on behalf of the project proponent. Specifically, the information we are requesting from the **Washoe Tribe of Nevada and California** is the following:

1. Are you aware of any culturally sensitive locations at or near the project location?
2. Do you have any concerns regarding the proposed project?
3. Do you need further information on the project?
4. Are there any others you would suggest be consulted on this project?

Your interest and participation are invaluable to the process. Both Great Basin Consulting Group and RCI want to ensure that any Tribal concerns are treated with respect and are addressed. The Washoe Tribe of Nevada and California can request participation in the Section 106 process as a consulting party.

If you have any questions or concerns about the Section 106-consultation process, please contact Michael Drews, Great Basin Group, LLC, mdrews@greatbasingroup.com or 775-560-5074. If you have specific questions about the pier project at this property you may contact JoAnne Michal, RCI joanne@rci-nv-com or 775-883-1600.

Sincerely,



Michael Drews, Principal

Great Basin Consulting Group

Attachments: Topographic Map, Project Area, Draft Cultural Resources Report



April 21, 2022

Mr. Sherrel Smokey
Chairperson
Washoe Tribe of Nevada and California
919 Highway 3995 North
Gardnerville, Nevada 89410

Subject: Invitation to Begin Informal Consultation for the Proposed Chichewa/Sierra High Farms Cannabis Cultivation Project, Mono County, California (APN 001-150-004)

Dear Mr. Smokey,

The purpose of this letter is to initiate informal consultation on the Proposed Chichewa/Sierra High Farms Cannabis Cultivation Project, Mono County, California (APN 001-150-004). Great Basin Consulting Group, LLC conducted a Class III reconnaissance survey for the proposed Chichewa/Sierra High Farms Cannabis Cultivation Project in Mono County, California (APN 001-150-004). The inventory was conducted to meet California Environmental Quality Act (CEQA) and AB 52 requirements. Formal Government to Government Consultation will be directed by Mono County.

Sierra High Farms is an adult/medical cannabis production and distribution facility. Product will be grown both indoor and outdoor. The indoor cultivation portion of the project will operate under a California Micro-business license issued by the DCC (Bureau of Cannabis Control) and will consist of cultivation, distribution, and non-storefront retail.

The outdoor portion will operate on a cultivator's license issued by the DCC. The property has the land use designation AG10 on which cannabis activities are allowed subject to a use permit and operation permit approved by Mono County.

The project site consists of approximately three (3) acres of site improvements for indoor cultivation use including greenhouses, lab, nursery, maintenance shop building, driveways, parking, and on-site wastewater treatment system. Components include:

- Four (4) 8,000 square-foot greenhouses (80' by 100') \ (up to 10,500 sq ft indoor mature plant canopy)
- One cultivation lab (4,200 sq ft, 60' by 70')
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- One well pump house 150 sq ft (10x15')
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- Three water storage tanks (5,000 gallons).

The outdoor cultivation area covers ten (10) acres and includes:

- Ten (10) acres of outdoor cannabis cultivation area including hoop house structures
- Four storage containers of approximately 8 x 40' for outdoor cultivation tools and storage use.

The cultural resources inventory covered approximately 18 acres within the northern portion of the parcel where indoor and outdoor development is proposed. Access is via existing road. All staging will be confined to the development footprint.

In compliance with CEQA (Public Resources Code 2100 et seq.) and sections pertaining to historic resources (PRC 5024, PRC 5025(f), PRC 5024.1, PRC 5025.5) Great Basin Consulting Group, LLC was contracted by Resource Concepts Inc. (RCI) to complete a Class III archaeological inventory within the project area.

APN 001-150-004 is located near the town of Topaz, just south of Topaz Lake along the west side of Antelope Valley in northern Mono County (Figure 1). Antelope Valley is a 3.5 mile wide by 15 mile long alluvial plain drained by the West Walker River. The river flows northward through the valley eventually emptying into Walker Lake. The West Walker River Canyon marks the southern boundary of Antelope Valley while Topaz Lake, an agricultural reservoir and the Pine Nut Mountains lie at the northern edge of the valley. Step faults along the eastern edge of the Sierra Nevada define the western edge of Antelope Valley, the Sweetwater Mountains and Wellington Hills define the valley's eastern boundary. Vegetation in the area is typical of the Great Basin. Pinon and juniper occur in the surrounding mountains, sage and buckbrush dominate the mountain pediment and non-agricultural lands along the valley bottom. Agricultural fields characterize most of the valley floor (Figure 2). Small residential parcels on lots of 1 to 5 acres occur along US 395. Scattered cottonwoods and willows occur along ditches and as shade trees or windbreaks at farmsteads.

The project area lies along the east side of the valley and abuts the Nevada State Line. Access to the parcel is via Eastside Road and a road following the state line. Most of the parcel is covered by scattered sagebrush and crossed by existing roads. The parcel covers approximately 128 acres, of which only the northern 18 acres are proposed for development (Figure 3). Agricultural fields lie just west of the property. The area proposed for development has been disturbed by brush clearing, leaving only about 5.25 acres of undisturbed land.

Prior to the field visit, pertinent site records and documentation was requested of the California Historic Resource Information System, Eastern Information Center (EIC) and records available in the Nevada Cultural Resources Information System (NVCRIS) were consulted.

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A single steel horseshoe was identified within the inventoried portion of APN 001-150-004.

The project proponent understands the possibility that there may be resources of concern to the Washoe Tribe of Nevada and California within the initial study area for this project. It is the proponent's goal to avoid cultural resources if possible, so your assistance on this matter would be most welcome.

Great Basin Consulting Group, LLC, a consultant working with RCI to prepare a cultural report is contacting you to consult on this project on behalf of the project proponent. Specifically, the information we are requesting from the **Washoe Tribe of Nevada and California** is the following:

1. Are you aware of any culturally sensitive locations at or near the project location?
2. Do you have any concerns regarding the proposed project?
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If you have any questions or concerns about the Section 106-consultation process, please contact Michael Drews, Great Basin Group, LLC, mdrews@greatbasingroup.com or 775-560-5074. If you have specific questions about the pier project at this property you may contact JoAnne Michal, RCI joanne@rci-nv-com or 775-883-1600.

Sincerely,



Michael Drews, Principal

Great Basin Consulting Group

Attachments: Topographic Map, Project Area, Draft Cultural Resources Report



April 21, 2022

Ms. Tina Braitewaite
Chairperson
Ututuu Gwaitu Tribe of the Benton Paiute Reservation
555 Yellow Jacket Road / 25669 Hwy. 6, PMB 1
Benton, CA, 93512

Subject: Invitation to Begin Informal Consultation for the Proposed Chichewa/Sierra High Farms Cannabis Cultivation Project, Mono County, California (APN 001-150-004)

Dear Ms. Braitewaite,

The purpose of this letter is to initiate informal consultation on the Proposed Chichewa/Sierra High Farms Cannabis Cultivation Project, Mono County, California (APN 001-150-004). Great Basin Consulting Group, LLC conducted a Class III reconnaissance survey for the proposed Chichewa/Sierra High Farms Cannabis Cultivation Project in Mono County, California (APN 001-150-004). The inventory was conducted to meet California Environmental Quality Act (CEQA) and AB 52 requirements. Formal Government to Government Consultation will be directed by Mono County.

Sierra High Farms is an adult/medical cannabis production and distribution facility. Product will be grown both indoor and outdoor. The indoor cultivation portion of the project will operate under a California Micro-business license issued by the DCC (Bureau of Cannabis Control) and will consist of cultivation, distribution, and non-storefront retail.

The outdoor portion will operate on a cultivator's license issued by the DCC. The property has the land use designation AG10 on which cannabis activities are allowed subject to a use permit and operation permit approved by Mono County.

The project site consists of approximately three (3) acres of site improvements for indoor cultivation use including greenhouses, lab, nursery, maintenance shop building, driveways, parking, and on-site wastewater treatment system. Components include:

- Four (4) 8,000 square-foot greenhouses (80' by 100') \ (up to 10,500 sq ft indoor mature plant canopy)
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The cultural resources inventory covered approximately 18 acres within the northern portion of the parcel where indoor and outdoor development is proposed. Access is via existing road. All staging will be confined to the development footprint.

In compliance with CEQA (Public Resources Code 2100 et seq.) and sections pertaining to historic resources (PRC 5024, PRC 5025(f), PRC 5024.1, PRC 5025.5) Great Basin Consulting Group, LLC was contracted by Resource Concepts Inc. (RCI) to complete a Class III archaeological inventory within the project area.

APN 001-150-004 is located near the town of Topaz, just south of Topaz Lake along the west side of Antelope Valley in northern Mono County (Figure 1). Antelope Valley is a 3.5 mile wide by 15 mile long alluvial plain drained by the West Walker River. The river flows northward through the valley eventually emptying into Walker Lake. The West Walker River Canyon marks the southern boundary of Antelope Valley while Topaz Lake, an agricultural reservoir and the Pine Nut Mountains lie at the northern edge of the valley. Step faults along the eastern edge of the Sierra Nevada define the western edge of Antelope Valley, the Sweetwater Mountains and Wellington Hills define the valley's eastern boundary. Vegetation in the area is typical of the Great Basin. Pinon and juniper occur in the surrounding mountains, sage and buckbrush dominate the mountain pediment and non-agricultural lands along the valley bottom. Agricultural fields characterize most of the valley floor (Figure 2). Small residential parcels on lots of 1 to 5 acres occur along US 395. Scattered cottonwoods and willows occur along ditches and as shade trees or windbreaks at farmsteads.

The project area lies along the east side of the valley and abuts the Nevada State Line. Access to the parcel is via Eastside Road and a road following the state line. Most of the parcel is covered by scattered sagebrush and crossed by existing roads. The parcel covers approximately 128 acres, of which only the northern 18 acres are proposed for development (Figure 3). Agricultural fields lie just west of the property. The area proposed for development has been disturbed by brush clearing, leaving only about 5.25 acres of undisturbed land.

Prior to the field visit, pertinent site records and documentation was requested of the California Historic Resource Information System, Eastern Information Center (EIC) and records available in the Nevada Cultural Resources Information System (NVCRIS) were consulted.

On March 24, 2022, EIC responded to the records search request (Appendix 1). They indicate that no cultural resource inventories or cultural resources have been recorded within one-half mile of the project parcel. A search of NVCRIS shows one inventory (*A Cultural Resources Survey Report for Enhancement of Operations and Training Proficiency at Marine Corps Mountain Warfare Training Center, Mono County, California, and Douglas County, Lyon County, and Mineral County, Nevada* 19824/R2009041701936) and one cultural resource located along Eastside Road within the one-half mile record search extent.

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A single steel horseshoe was identified within the inventoried portion of APN 001-150-004.

The project proponent understands the possibility that there may be resources of concern to the Utu Utu Gwaitu Tribe of the Benton Paiute Reservation within the initial study area for this project. It is the proponent's goal to avoid cultural resources if possible, so your assistance on this matter would be most welcome.

Great Basin Consulting Group, LLC, a consultant working with RCI to prepare a cultural report is contacting you to consult on this project on behalf of the project proponent. Specifically, the information we are requesting from the **Utu Utu Gwaitu Tribe of the Benton Paiute Reservation** is the following:

1. Are you aware of any culturally sensitive locations at or near the project location?
2. Do you have any concerns regarding the proposed project?
3. Do you need further information on the project?
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Your interest and participation are invaluable to the process. Both Great Basin Consulting Group and RCI want to ensure that any Tribal concerns are treated with respect and are addressed. The Utu Utu Gwaitu Tribe of the Benton Paiute Reservation can request participation in the Section 106 process as a consulting party.

If you have any questions or concerns about the Section 106-consultation process, please contact Michael Drews, Great Basin Group, LLC, mdrews@greatbasingroup.com or 775-560-5074. If you have specific questions about the pier project at this property you may contact JoAnne Michal, RCI joanne@rci-nv-com or 775-883-1600.

Sincerely,



Michael Drews, Principal

Great Basin Consulting Group

Attachments: Topographic Map, Project Area, Draft Cultural Resources Report



April 21, 2022

Mr. James Rambeau
Chairperson
Big Pine Tribe of the Owens Valley Paiute
P.O. Box 700
Big Pine, CA, 93513

Subject: Invitation to Begin Informal Consultation for the Proposed Chichewa/Sierra High Farms Cannabis Cultivation Project, Mono County, California (APN 001-150-004)

Dear Mr. Rambeau,

The purpose of this letter is to initiate informal consultation on the Proposed Chichewa/Sierra High Farms Cannabis Cultivation Project, Mono County, California (APN 001-150-004). Great Basin Consulting Group, LLC conducted a Class III reconnaissance survey for the proposed Chichewa/Sierra High Farms Cannabis Cultivation Project in Mono County, California (APN 001-150-004). The inventory was conducted to meet California Environmental Quality Act (CEQA) and AB 52 requirements. Formal Government to Government Consultation will be directed by Mono County.

Sierra High Farms is an adult/medical cannabis production and distribution facility. Product will be grown both indoor and outdoor. The indoor cultivation portion of the project will operate under a California Micro-business license issued by the DCC (Bureau of Cannabis Control) and will consist of cultivation, distribution, and non-storefront retail.

The outdoor portion will operate on a cultivator's license issued by the DCC. The property has the land use designation AG10 on which cannabis activities are allowed subject to a use permit and operation permit approved by Mono County.

The project site consists of approximately three (3) acres of site improvements for indoor cultivation use including greenhouses, lab, nursery, maintenance shop building, driveways, parking, and on-site wastewater treatment system. Components include:

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The outdoor cultivation area covers ten (10) acres and includes:

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- Four storage containers of approximately 8 x 40' for outdoor cultivation tools and storage use.

The cultural resources inventory covered approximately 18 acres within the northern portion of the parcel where indoor and outdoor development is proposed. Access is via existing road. All staging will be confined to the development footprint.

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APN 001-150-004 is located near the town of Topaz, just south of Topaz Lake along the west side of Antelope Valley in northern Mono County (Figure 1). Antelope Valley is a 3.5 mile wide by 15 mile long alluvial plain drained by the West Walker River. The river flows northward through the valley eventually emptying into Walker Lake. The West Walker River Canyon marks the southern boundary of Antelope Valley while Topaz Lake, an agricultural reservoir and the Pine Nut Mountains lie at the northern edge of the valley. Step faults along the eastern edge of the Sierra Nevada define the western edge of Antelope Valley, the Sweetwater Mountains and Wellington Hills define the valley's eastern boundary. Vegetation in the area is typical of the Great Basin. Pinon and juniper occur in the surrounding mountains, sage and buckbrush dominate the mountain pediment and non-agricultural lands along the valley bottom. Agricultural fields characterize most of the valley floor (Figure 2). Small residential parcels on lots of 1 to 5 acres occur along US 395. Scattered cottonwoods and willows occur along ditches and as shade trees or windbreaks at farmsteads.

The project area lies along the east side of the valley and abuts the Nevada State Line. Access to the parcel is via Eastside Road and a road following the state line. Most of the parcel is covered by scattered sagebrush and crossed by existing roads. The parcel covers approximately 128 acres, of which only the northern 18 acres are proposed for development (Figure 3). Agricultural fields lie just west of the property. The area proposed for development has been disturbed by brush clearing, leaving only about 5.25 acres of undisturbed land.

Prior to the field visit, pertinent site records and documentation was requested of the California Historic Resource Information System, Eastern Information Center (EIC) and records available in the Nevada Cultural Resources Information System (NVCRIS) were consulted.

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Sincerely,



Michael Drews, Principal

Great Basin Consulting Group

Attachments: Topographic Map, Project Area, Draft Cultural Resources Report



April 21, 2022

Ms. Sally Manning
Environmental Director
Big Pine Tribe of the Owens Valley Paiute
P.O. Box 700
Big Pine, CA, 93513

Subject: Invitation to Begin Informal Consultation for the Proposed Chichewa/Sierra High Farms Cannabis Cultivation Project, Mono County, California (APN 001-150-004)

Dear Ms. Manning,

The purpose of this letter is to initiate informal consultation on the Proposed Chichewa/Sierra High Farms Cannabis Cultivation Project, Mono County, California (APN 001-150-004). Great Basin Consulting Group, LLC conducted a Class III reconnaissance survey for the proposed Chichewa/Sierra High Farms Cannabis Cultivation Project in Mono County, California (APN 001-150-004). The inventory was conducted to meet California Environmental Quality Act (CEQA) and AB 52 requirements. Formal Government to Government Consultation will be directed by Mono County.

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3. Do you need further information on the project?
4. Are there any others you would suggest be consulted on this project?

Your interest and participation are invaluable to the process. Both Great Basin Consulting Group and RCI want to ensure that any Tribal concerns are treated with respect and are addressed. The Big Pine Tribe of the Owens Valley Paiute can request participation in the Section 106 process as a consulting party.

If you have any questions or concerns about the Section 106-consultation process, please contact Michael Drews, Great Basin Group, LLC, mdrews@greatbasingroup.com or 775-560-5074. If you have specific questions about the pier project at this property you may contact JoAnne Michal, RCI joanne@rci-nv-com or 775-883-1600.

Sincerely,



Michael Drews, Principal

Great Basin Consulting Group

Attachments: Topographic Map, Project Area, Draft Cultural Resources Report



April 21, 2022

Ms. Danelle Gutierrez
Tribal Historic Preservation Officer
Big Pine Tribe of the Owens Valley Paiute
P.O. Box 700
Big Pine, CA, 93513

Subject: Invitation to Begin Informal Consultation for the Proposed Chichewa/Sierra High Farms Cannabis Cultivation Project, Mono County, California (APN 001-150-004)

Dear Ms. Gutierrez,

The purpose of this letter is to initiate informal consultation on the Proposed Chichewa/Sierra High Farms Cannabis Cultivation Project, Mono County, California (APN 001-150-004). Great Basin Consulting Group, LLC conducted a Class III reconnaissance survey for the proposed Chichewa/Sierra High Farms Cannabis Cultivation Project in Mono County, California (APN 001-150-004). The inventory was conducted to meet California Environmental Quality Act (CEQA) and AB 52 requirements. Formal Government to Government Consultation will be directed by Mono County.

Sierra High Farms is an adult/medical cannabis production and distribution facility. Product will be grown both indoor and outdoor. The indoor cultivation portion of the project will operate under a California Micro-business license issued by the DCC (Bureau of Cannabis Control) and will consist of cultivation, distribution, and non-storefront retail.

The outdoor portion will operate on a cultivator's license issued by the DCC. The property has the land use designation AG10 on which cannabis activities are allowed subject to a use permit and operation permit approved by Mono County.

The project site consists of approximately three (3) acres of site improvements for indoor cultivation use including greenhouses, lab, nursery, maintenance shop building, driveways, parking, and on-site wastewater treatment system. Components include:

- Four (4) 8,000 square-foot greenhouses (80' by 100') \ (up to 10,500 sq ft indoor mature plant canopy)
- One cultivation lab (4,200 sq ft, 60' by 70')
- One maintenance shop (2,400 sq ft, 40' by 60')
- One drying shed (2,100 sq ft, 35' by 65')
- One nursery and processing building (5,000 sq ft, 50' by 100')

- One well pump house 150 sq ft (10x15')
- Water tank house (need dimensions)
- Three water storage tanks (5,000 gallons).

The outdoor cultivation area covers ten (10) acres and includes:

- Ten (10) acres of outdoor cannabis cultivation area including hoop house structures
- Four storage containers of approximately 8 x 40' for outdoor cultivation tools and storage use.

The cultural resources inventory covered approximately 18 acres within the northern portion of the parcel where indoor and outdoor development is proposed. Access is via existing road. All staging will be confined to the development footprint.

In compliance with CEQA (Public Resources Code 2100 et seq.) and sections pertaining to historic resources (PRC 5024, PRC 5025(f), PRC 5024.1, PRC 5025.5) Great Basin Consulting Group, LLC was contracted by Resource Concepts Inc. (RCI) to complete a Class III archaeological inventory within the project area.

APN 001-150-004 is located near the town of Topaz, just south of Topaz Lake along the west side of Antelope Valley in northern Mono County (Figure 1). Antelope Valley is a 3.5 mile wide by 15 mile long alluvial plain drained by the West Walker River. The river flows northward through the valley eventually emptying into Walker Lake. The West Walker River Canyon marks the southern boundary of Antelope Valley while Topaz Lake, an agricultural reservoir and the Pine Nut Mountains lie at the northern edge of the valley. Step faults along the eastern edge of the Sierra Nevada define the western edge of Antelope Valley, the Sweetwater Mountains and Wellington Hills define the valley's eastern boundary. Vegetation in the area is typical of the Great Basin. Pinon and juniper occur in the surrounding mountains, sage and buckbrush dominate the mountain pediment and non-agricultural lands along the valley bottom. Agricultural fields characterize most of the valley floor (Figure 2). Small residential parcels on lots of 1 to 5 acres occur along US 395. Scattered cottonwoods and willows occur along ditches and as shade trees or windbreaks at farmsteads.

The project area lies along the east side of the valley and abuts the Nevada State Line. Access to the parcel is via Eastside Road and a road following the state line. Most of the parcel is covered by scattered sagebrush and crossed by existing roads. The parcel covers approximately 128 acres, of which only the northern 18 acres are proposed for development (Figure 3). Agricultural fields lie just west of the property. The area proposed for development has been disturbed by brush clearing, leaving only about 5.25 acres of undisturbed land.

Prior to the field visit, pertinent site records and documentation was requested of the California Historic Resource Information System, Eastern Information Center (EIC) and records available in the Nevada Cultural Resources Information System (NVCRIS) were consulted.

On March 24, 2022, EIC responded to the records search request (Appendix 1). They indicate that no cultural resource inventories or cultural resources have been recorded within one-half mile of the project parcel. A search of NVCRIS shows one inventory (*A Cultural Resources Survey Report for Enhancement of Operations and Training Proficiency at Marine Corps Mountain Warfare Training Center, Mono County, California, and Douglas County, Lyon County, and Mineral County, Nevada 19824/R2009041701936*) and one cultural resource located along Eastside Road within the one-half mile record search extent.

26Ly1698/USFS04170208392 comprises remains of the Double Springs – Desert Creek Toll Road/Risue Canyon Road.

No constructed features are shown in the project vicinity on the 1874 General Land Office Rectangular Survey Plat for Township 9 North, Range 23 East. Roads currently crossing the project parcel are depicted on the 1956 Desert Creek Peak 15-minute map.

A single steel horseshoe was identified within the inventoried portion of APN 001-150-004.

The project proponent understands the possibility that there may be resources of concern to the Big Pine Tribe of the Owens Valley Paiute within the initial study area for this project. It is the proponent's goal to avoid cultural resources if possible, so your assistance on this matter would be most welcome.

Great Basin Consulting Group, LLC, a consultant working with RCI to prepare a cultural report is contacting you to consult on this project on behalf of the project proponent. Specifically, the information we are requesting from the **Big Pine Tribe of the Owens Valley Paiute** is the following:

1. Are you aware of any culturally sensitive locations at or near the project location?
2. Do you have any concerns regarding the proposed project?
3. Do you need further information on the project?
4. Are there any others you would suggest be consulted on this project?

Your interest and participation are invaluable to the process. Both Great Basin Consulting Group and RCI want to ensure that any Tribal concerns are treated with respect and are addressed. The Big Pine Tribe of the Owens Valley Paiute can request participation in the Section 106 process as a consulting party.

If you have any questions or concerns about the Section 106-consultation process, please contact Michael Drews, Great Basin Group, LLC, mdrews@greatbasingroup.com or 775-560-5074. If you have specific questions about the pier project at this property you may contact JoAnne Michal, RCI joanne@rci-nv-com or 775-883-1600.

Sincerely,



Michael Drews, Principal

Great Basin Consulting Group

Attachments: Topographic Map, Project Area, Draft Cultural Resources Report



April 21, 2022

Mr. Allen Summers
Chairperson
Bishop Paiute Tribe
50 Tu Su Lane
Bishop, CA 93514

Subject: Invitation to Begin Informal Consultation for the Proposed Chichewa/Sierra High Farms Cannabis Cultivation Project, Mono County, California (APN 001-150-004)

Dear Mr. Summers,

The purpose of this letter is to initiate informal consultation on the Proposed Chichewa/Sierra High Farms Cannabis Cultivation Project, Mono County, California (APN 001-150-004). Great Basin Consulting Group, LLC conducted a Class III reconnaissance survey for the proposed Chichewa/Sierra High Farms Cannabis Cultivation Project in Mono County, California (APN 001-150-004). The inventory was conducted to meet California Environmental Quality Act (CEQA) and AB 52 requirements. Formal Government to Government Consultation will be directed by Mono County.

Sierra High Farms is an adult/medical cannabis production and distribution facility. Product will be grown both indoor and outdoor. The indoor cultivation portion of the project will operate under a California Micro-business license issued by the DCC (Bureau of Cannabis Control) and will consist of cultivation, distribution, and non-storefront retail.

The outdoor portion will operate on a cultivator's license issued by the DCC. The property has the land use designation AG10 on which cannabis activities are allowed subject to a use permit and operation permit approved by Mono County.

The project site consists of approximately three (3) acres of site improvements for indoor cultivation use including greenhouses, lab, nursery, maintenance shop building, driveways, parking, and on-site wastewater treatment system. Components include:

- Four (4) 8,000 square-foot greenhouses (80' by 100') \ (up to 10,500 sq ft indoor mature plant canopy)
- One cultivation lab (4,200 sq ft, 60' by 70')
- One maintenance shop (2,400 sq ft, 40' by 60')
- One drying shed (2,100 sq ft, 35' by 65')
- One nursery and processing building (5,000 sq ft, 50' by 100')

- One well pump house 150 sq ft (10x15')
- Water tank house (need dimensions)
- Three water storage tanks (5,000 gallons).

The outdoor cultivation area covers ten (10) acres and includes:

- Ten (10) acres of outdoor cannabis cultivation area including hoop house structures
- Four storage containers of approximately 8 x 40' for outdoor cultivation tools and storage use.

The cultural resources inventory covered approximately 18 acres within the northern portion of the parcel where indoor and outdoor development is proposed. Access is via existing road. All staging will be confined to the development footprint.

In compliance with CEQA (Public Resources Code 2100 et seq.) and sections pertaining to historic resources (PRC 5024, PRC 5025(f), PRC 5024.1, PRC 5025.5) Great Basin Consulting Group, LLC was contracted by Resource Concepts Inc. (RCI) to complete a Class III archaeological inventory within the project area.

APN 001-150-004 is located near the town of Topaz, just south of Topaz Lake along the west side of Antelope Valley in northern Mono County (Figure 1). Antelope Valley is a 3.5 mile wide by 15 mile long alluvial plain drained by the West Walker River. The river flows northward through the valley eventually emptying into Walker Lake. The West Walker River Canyon marks the southern boundary of Antelope Valley while Topaz Lake, an agricultural reservoir and the Pine Nut Mountains lie at the northern edge of the valley. Step faults along the eastern edge of the Sierra Nevada define the western edge of Antelope Valley, the Sweetwater Mountains and Wellington Hills define the valley's eastern boundary. Vegetation in the area is typical of the Great Basin. Pinon and juniper occur in the surrounding mountains, sage and buckbrush dominate the mountain pediment and non-agricultural lands along the valley bottom. Agricultural fields characterize most of the valley floor (Figure 2). Small residential parcels on lots of 1 to 5 acres occur along US 395. Scattered cottonwoods and willows occur along ditches and as shade trees or windbreaks at farmsteads.

The project area lies along the east side of the valley and abuts the Nevada State Line. Access to the parcel is via Eastside Road and a road following the state line. Most of the parcel is covered by scattered sagebrush and crossed by existing roads. The parcel covers approximately 128 acres, of which only the northern 18 acres are proposed for development (Figure 3). Agricultural fields lie just west of the property. The area proposed for development has been disturbed by brush clearing, leaving only about 5.25 acres of undisturbed land.

Prior to the field visit, pertinent site records and documentation was requested of the California Historic Resource Information System, Eastern Information Center (EIC) and records available in the Nevada Cultural Resources Information System (NVCRIS) were consulted.

On March 24, 2022, EIC responded to the records search request (Appendix 1). They indicate that no cultural resource inventories or cultural resources have been recorded within one-half mile of the project parcel. A search of NVCRIS shows one inventory (*A Cultural Resources Survey Report for Enhancement of Operations and Training Proficiency at Marine Corps Mountain Warfare Training Center, Mono County, California, and Douglas County, Lyon County, and Mineral County, Nevada* 19824/R2009041701936) and one cultural resource located along Eastside Road within the one-half mile record search extent.

26Ly1698/USFS04170208392 comprises remains of the Double Springs – Desert Creek Toll Road/Risue Canyon Road.

No constructed features are shown in the project vicinity on the 1874 General Land Office Rectangular Survey Plat for Township 9 North, Range 23 East. Roads currently crossing the project parcel are depicted on the 1956 Desert Creek Peak 15-minute map.

A single steel horseshoe was identified within the inventoried portion of APN 001-150-004.

The project proponent understands the possibility that there may be resources of concern to the Bishop Paiute Tribe within the initial study area for this project. It is the proponent's goal to avoid cultural resources if possible, so your assistance on this matter would be most welcome.

Great Basin Consulting Group, LLC, a consultant working with RCI to prepare a cultural report is contacting you to consult on this project on behalf of the project proponent. Specifically, the information we are requesting from the Bishop Paiute Tribe is the following:

1. Are you aware of any culturally sensitive locations at or near the project location?
2. Do you have any concerns regarding the proposed project?
3. Do you need further information on the project?
4. Are there any others you would suggest be consulted on this project?

Your interest and participation are invaluable to the process. Both Great Basin Consulting Group and RCI want to ensure that any Tribal concerns are treated with respect and are addressed. The Bishop Paiute Tribe can request participation in the Section 106 process as a consulting party.

If you have any questions or concerns about the Section 106-consultation process, please contact Michael Drews, Great Basin Group, LLC, mdrews@greatbasingroup.com or 775-560-5074. If you have specific questions about the pier project at this property you may contact JoAnne Michal, RCI joanne@rci-nv-com or 775-883-1600.

Sincerely,



Michael Drews, Principal

Great Basin Consulting Group

Attachments: Topographic Map, Project Area, Draft Cultural Resources Report



April 21, 2022

Mr. John Glasier
Chairperson
Bridgeport Paiute Indian Colony
P.O. Box 37
Bridgeport, CA 93517

Subject: Invitation to Begin Informal Consultation for the Proposed Chichewa/Sierra High Farms Cannabis Cultivation Project, Mono County, California (APN 001-150-004)

Dear Mr. Glasier,

The purpose of this letter is to initiate informal consultation on the Proposed Chichewa/Sierra High Farms Cannabis Cultivation Project, Mono County, California (APN 001-150-004). Great Basin Consulting Group, LLC conducted a Class III reconnaissance survey for the proposed Chichewa/Sierra High Farms Cannabis Cultivation Project in Mono County, California (APN 001-150-004). The inventory was conducted to meet California Environmental Quality Act (CEQA) and AB 52 requirements. Formal Government to Government Consultation will be directed by Mono County.

Sierra High Farms is an adult/medical cannabis production and distribution facility. Product will be grown both indoor and outdoor. The indoor cultivation portion of the project will operate under a California Micro-business license issued by the DCC (Bureau of Cannabis Control) and will consist of cultivation, distribution, and non-storefront retail.

The outdoor portion will operate on a cultivator's license issued by the DCC. The property has the land use designation AG10 on which cannabis activities are allowed subject to a use permit and operation permit approved by Mono County.

The project site consists of approximately three (3) acres of site improvements for indoor cultivation use including greenhouses, lab, nursery, maintenance shop building, driveways, parking, and on-site wastewater treatment system. Components include:

- Four (4) 8,000 square-foot greenhouses (80' by 100') \ (up to 10,500 sq ft indoor mature plant canopy)
- One cultivation lab (4,200 sq ft, 60' by 70')
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- One well pump house 150 sq ft (10x15')
- Water tank house (need dimensions)
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The outdoor cultivation area covers ten (10) acres and includes:

- Ten (10) acres of outdoor cannabis cultivation area including hoop house structures
- Four storage containers of approximately 8 x 40' for outdoor cultivation tools and storage use.

The cultural resources inventory covered approximately 18 acres within the northern portion of the parcel where indoor and outdoor development is proposed. Access is via existing road. All staging will be confined to the development footprint.

In compliance with CEQA (Public Resources Code 2100 et seq.) and sections pertaining to historic resources (PRC 5024, PRC 5025(f), PRC 5024.1, PRC 5025.5) Great Basin Consulting Group, LLC was contracted by Resource Concepts Inc. (RCI) to complete a Class III archaeological inventory within the project area.

APN 001-150-004 is located near the town of Topaz, just south of Topaz Lake along the west side of Antelope Valley in northern Mono County (Figure 1). Antelope Valley is a 3.5 mile wide by 15 mile long alluvial plain drained by the West Walker River. The river flows northward through the valley eventually emptying into Walker Lake. The West Walker River Canyon marks the southern boundary of Antelope Valley while Topaz Lake, an agricultural reservoir and the Pine Nut Mountains lie at the northern edge of the valley. Step faults along the eastern edge of the Sierra Nevada define the western edge of Antelope Valley, the Sweetwater Mountains and Wellington Hills define the valley's eastern boundary. Vegetation in the area is typical of the Great Basin. Pinon and juniper occur in the surrounding mountains, sage and buckbrush dominate the mountain pediment and non-agricultural lands along the valley bottom. Agricultural fields characterize most of the valley floor (Figure 2). Small residential parcels on lots of 1 to 5 acres occur along US 395. Scattered cottonwoods and willows occur along ditches and as shade trees or windbreaks at farmsteads.

The project area lies along the east side of the valley and abuts the Nevada State Line. Access to the parcel is via Eastside Road and a road following the state line. Most of the parcel is covered by scattered sagebrush and crossed by existing roads. The parcel covers approximately 128 acres, of which only the northern 18 acres are proposed for development (Figure 3). Agricultural fields lie just west of the property. The area proposed for development has been disturbed by brush clearing, leaving only about 5.25 acres of undisturbed land.

Prior to the field visit, pertinent site records and documentation was requested of the California Historic Resource Information System, Eastern Information Center (EIC) and records available in the Nevada Cultural Resources Information System (NVCRIS) were consulted.

On March 24, 2022, EIC responded to the records search request (Appendix 1). They indicate that no cultural resource inventories or cultural resources have been recorded within one-half mile of the project parcel. A search of NVCRIS shows one inventory (*A Cultural Resources Survey Report for Enhancement of Operations and Training Proficiency at Marine Corps Mountain Warfare Training Center, Mono County, California, and Douglas County, Lyon County, and Mineral County, Nevada* 19824/R2009041701936) and one cultural resource located along Eastside Road within the one-half mile record search extent.

26Ly1698/USFS04170208392 comprises remains of the Double Springs – Desert Creek Toll Road/Risue Canyon Road.

No constructed features are shown in the project vicinity on the 1874 General Land Office Rectangular Survey Plat for Township 9 North, Range 23 East. Roads currently crossing the project parcel are depicted on the 1956 Desert Creek Peak 15-minute map.

A single steel horseshoe was identified within the inventoried portion of APN 001-150-004.

The project proponent understands the possibility that there may be resources of concern to the Bridgeport Paiute Indian Colony within the initial study area for this project. It is the proponent's goal to avoid cultural resources if possible, so your assistance on this matter would be most welcome.

Great Basin Consulting Group, LLC, a consultant working with RCI to prepare a cultural report is contacting you to consult on this project on behalf of the project proponent. Specifically, the information we are requesting from the Bridgeport Paiute Indian Colony is the following:

1. Are you aware of any culturally sensitive locations at or near the project location?
2. Do you have any concerns regarding the proposed project?
3. Do you need further information on the project?
4. Are there any others you would suggest be consulted on this project?

Your interest and participation are invaluable to the process. Both Great Basin Consulting Group and RCI want to ensure that any Tribal concerns are treated with respect and are addressed. The Bridgeport Paiute Indian Colony can request participation in the Section 106 process as a consulting party.

If you have any questions or concerns about the Section 106-consultation process, please contact Michael Drews, Great Basin Group, LLC, mdrews@greatbasingroup.com or 775-560-5074. If you have specific questions about the pier project at this property you may contact JoAnne Michal, RCI joanne@rci-nv-com or 775-883-1600.

Sincerely,



Michael Drews, Principal

Great Basin Consulting Group

Attachments: Topographic Map, Project Area, Draft Cultural Resources Report



April 21, 2022

Ms. Charlotte Lange
Chairperson
Mono Lake Kutzadika Tribe
P.O. Box 237
Lee Vining, CA, 93541

Subject: Invitation to Begin Informal Consultation for the Proposed Chichewa/Sierra High Farms Cannabis Cultivation Project, Mono County, California (APN 001-150-004)

Dear Ms. Lange,

The purpose of this letter is to initiate informal consultation on the Proposed Chichewa/Sierra High Farms Cannabis Cultivation Project, Mono County, California (APN 001-150-004). Great Basin Consulting Group, LLC conducted a Class III reconnaissance survey for the proposed Chichewa/Sierra High Farms Cannabis Cultivation Project in Mono County, California (APN 001-150-004). The inventory was conducted to meet California Environmental Quality Act (CEQA) and AB 52 requirements. Formal Government to Government Consultation will be directed by Mono County.

Sierra High Farms is an adult/medical cannabis production and distribution facility. Product will be grown both indoor and outdoor. The indoor cultivation portion of the project will operate under a California Micro-business license issued by the DCC (Bureau of Cannabis Control) and will consist of cultivation, distribution, and non-storefront retail.

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The project site consists of approximately three (3) acres of site improvements for indoor cultivation use including greenhouses, lab, nursery, maintenance shop building, driveways, parking, and on-site wastewater treatment system. Components include:

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- One nursery and processing building (5,000 sq ft, 50' by 100')

- One well pump house 150 sq ft (10x15')
- Water tank house (need dimensions)
- Three water storage tanks (5,000 gallons).

The outdoor cultivation area covers ten (10) acres and includes:

- Ten (10) acres of outdoor cannabis cultivation area including hoop house structures
- Four storage containers of approximately 8 x 40' for outdoor cultivation tools and storage use.

The cultural resources inventory covered approximately 18 acres within the northern portion of the parcel where indoor and outdoor development is proposed. Access is via existing road. All staging will be confined to the development footprint.

In compliance with CEQA (Public Resources Code 2100 et seq.) and sections pertaining to historic resources (PRC 5024, PRC 5025(f), PRC 5024.1, PRC 5025.5) Great Basin Consulting Group, LLC was contracted by Resource Concepts Inc. (RCI) to complete a Class III archaeological inventory within the project area.

APN 001-150-004 is located near the town of Topaz, just south of Topaz Lake along the west side of Antelope Valley in northern Mono County (Figure 1). Antelope Valley is a 3.5 mile wide by 15 mile long alluvial plain drained by the West Walker River. The river flows northward through the valley eventually emptying into Walker Lake. The West Walker River Canyon marks the southern boundary of Antelope Valley while Topaz Lake, an agricultural reservoir and the Pine Nut Mountains lie at the northern edge of the valley. Step faults along the eastern edge of the Sierra Nevada define the western edge of Antelope Valley, the Sweetwater Mountains and Wellington Hills define the valley's eastern boundary. Vegetation in the area is typical of the Great Basin. Pinon and juniper occur in the surrounding mountains, sage and buckbrush dominate the mountain pediment and non-agricultural lands along the valley bottom. Agricultural fields characterize most of the valley floor (Figure 2). Small residential parcels on lots of 1 to 5 acres occur along US 395. Scattered cottonwoods and willows occur along ditches and as shade trees or windbreaks at farmsteads.

The project area lies along the east side of the valley and abuts the Nevada State Line. Access to the parcel is via Eastside Road and a road following the state line. Most of the parcel is covered by scattered sagebrush and crossed by existing roads. The parcel covers approximately 128 acres, of which only the northern 18 acres are proposed for development (Figure 3). Agricultural fields lie just west of the property. The area proposed for development has been disturbed by brush clearing, leaving only about 5.25 acres of undisturbed land.

Prior to the field visit, pertinent site records and documentation was requested of the California Historic Resource Information System, Eastern Information Center (EIC) and records available in the Nevada Cultural Resources Information System (NVCRIS) were consulted.

On March 24, 2022, EIC responded to the records search request (Appendix 1). They indicate that no cultural resource inventories or cultural resources have been recorded within one-half mile of the project parcel. A search of NVCRIS shows one inventory (*A Cultural Resources Survey Report for Enhancement of Operations and Training Proficiency at Marine Corps Mountain Warfare Training Center, Mono County, California, and Douglas County, Lyon County, and Mineral County, Nevada* 19824/R2009041701936) and one cultural resource located along Eastside Road within the one-half mile record search extent.

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A single steel horseshoe was identified within the inventoried portion of APN 001-150-004.

The project proponent understands the possibility that there may be resources of concern to the Mono Lake Kutzadika Tribe within the initial study area for this project. It is the proponent's goal to avoid cultural resources if possible, so your assistance on this matter would be most welcome.

Great Basin Consulting Group, LLC, a consultant working with RCI to prepare a cultural report is contacting you to consult on this project on behalf of the project proponent. Specifically, the information we are requesting from the Mono Lake Kutzadika Tribe is the following:

1. Are you aware of any culturally sensitive locations at or near the project location?
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Your interest and participation are invaluable to the process. Both Great Basin Consulting Group and RCI want to ensure that any Tribal concerns are treated with respect and are addressed. The Mono Lake Kutzadika Tribe can request participation in the Section 106 process as a consulting party.

If you have any questions or concerns about the Section 106-consultation process, please contact Michael Drews, Great Basin Group, LLC, mdrews@greatbasingroup.com or 775-560-5074. If you have specific questions about the pier project at this property you may contact JoAnne Michal, RCI joanne@rci-nv-com or 775-883-1600.

Sincerely,



Michael Drews, Principal

Great Basin Consulting Group

Attachments: Topographic Map, Project Area, Draft Cultural Resources Report



April 21, 2022

Ms. Melanie McFalls
Chairperson
Walker River Reservation
P.O. Box 220
Schurz, NV, 89427

Subject: Invitation to Begin Informal Consultation for the Proposed Chichewa/Sierra High Farms Cannabis Cultivation Project, Mono County, California (APN 001-150-004)

Dear Ms. McFalls,

The purpose of this letter is to initiate informal consultation on the Proposed Chichewa/Sierra High Farms Cannabis Cultivation Project, Mono County, California (APN 001-150-004). Great Basin Consulting Group, LLC conducted a Class III reconnaissance survey for the proposed Chichewa/Sierra High Farms Cannabis Cultivation Project in Mono County, California (APN 001-150-004). The inventory was conducted to meet California Environmental Quality Act (CEQA) and AB 52 requirements. Formal Government to Government Consultation will be directed by Mono County.

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- One cultivation lab (4,200 sq ft, 60' by 70')
- One maintenance shop (2,400 sq ft, 40' by 60')
- One drying shed (2,100 sq ft, 35' by 65')
- One nursery and processing building (5,000 sq ft, 50' by 100')

- One well pump house 150 sq ft (10x15')
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The outdoor cultivation area covers ten (10) acres and includes:

- Ten (10) acres of outdoor cannabis cultivation area including hoop house structures
- Four storage containers of approximately 8 x 40' for outdoor cultivation tools and storage use.

The cultural resources inventory covered approximately 18 acres within the northern portion of the parcel where indoor and outdoor development is proposed. Access is via existing road. All staging will be confined to the development footprint.

In compliance with CEQA (Public Resources Code 2100 et seq.) and sections pertaining to historic resources (PRC 5024, PRC 5025(f), PRC 5024.1, PRC 5025.5) Great Basin Consulting Group, LLC was contracted by Resource Concepts Inc. (RCI) to complete a Class III archaeological inventory within the project area.

APN 001-150-004 is located near the town of Topaz, just south of Topaz Lake along the west side of Antelope Valley in northern Mono County (Figure 1). Antelope Valley is a 3.5 mile wide by 15 mile long alluvial plain drained by the West Walker River. The river flows northward through the valley eventually emptying into Walker Lake. The West Walker River Canyon marks the southern boundary of Antelope Valley while Topaz Lake, an agricultural reservoir and the Pine Nut Mountains lie at the northern edge of the valley. Step faults along the eastern edge of the Sierra Nevada define the western edge of Antelope Valley, the Sweetwater Mountains and Wellington Hills define the valley's eastern boundary. Vegetation in the area is typical of the Great Basin. Pinon and juniper occur in the surrounding mountains, sage and buckbrush dominate the mountain pediment and non-agricultural lands along the valley bottom. Agricultural fields characterize most of the valley floor (Figure 2). Small residential parcels on lots of 1 to 5 acres occur along US 395. Scattered cottonwoods and willows occur along ditches and as shade trees or windbreaks at farmsteads.

The project area lies along the east side of the valley and abuts the Nevada State Line. Access to the parcel is via Eastside Road and a road following the state line. Most of the parcel is covered by scattered sagebrush and crossed by existing roads. The parcel covers approximately 128 acres, of which only the northern 18 acres are proposed for development (Figure 3). Agricultural fields lie just west of the property. The area proposed for development has been disturbed by brush clearing, leaving only about 5.25 acres of undisturbed land.

Prior to the field visit, pertinent site records and documentation was requested of the California Historic Resource Information System, Eastern Information Center (EIC) and records available in the Nevada Cultural Resources Information System (NVCRIS) were consulted.

On March 24, 2022, EIC responded to the records search request (Appendix 1). They indicate that no cultural resource inventories or cultural resources have been recorded within one-half mile of the project parcel. A search of NVCRIS shows one inventory (*A Cultural Resources Survey Report for Enhancement of Operations and Training Proficiency at Marine Corps Mountain Warfare Training Center, Mono County, California, and Douglas County, Lyon County, and Mineral County, Nevada* 19824/R2009041701936) and one cultural resource located along Eastside Road within the one-half mile record search extent.

26Ly1698/USFS04170208392 comprises remains of the Double Springs – Desert Creek Toll Road/Risue Canyon Road.

No constructed features are shown in the project vicinity on the 1874 General Land Office Rectangular Survey Plat for Township 9 North, Range 23 East. Roads currently crossing the project parcel are depicted on the 1956 Desert Creek Peak 15-minute map.

A single steel horseshoe was identified within the inventoried portion of APN 001-150-004.

The project proponent understands the possibility that there may be resources of concern to the Walker River Reservation within the initial study area for this project. It is the proponent's goal to avoid cultural resources if possible, so your assistance on this matter would be most welcome.

Great Basin Consulting Group, LLC, a consultant working with RCI to prepare a cultural report is contacting you to consult on this project on behalf of the project proponent. Specifically, the information we are requesting from the Walker River Reservation is the following:

1. Are you aware of any culturally sensitive locations at or near the project location?
2. Do you have any concerns regarding the proposed project?
3. Do you need further information on the project?
4. Are there any others you would suggest be consulted on this project?

Your interest and participation are invaluable to the process. Both Great Basin Consulting Group and RCI want to ensure that any Tribal concerns are treated with respect and are addressed. The Walker River Reservation can request participation in the Section 106 process as a consulting party.

If you have any questions or concerns about the Section 106-consultation process, please contact Michael Drews, Great Basin Group, LLC, mdrews@greatbasingroup.com or 775-560-5074. If you have specific questions about the pier project at this property you may contact JoAnne Michal, RCI joanne@rci-nv-com or 775-883-1600.

Sincerely,



Michael Drews, Principal

Great Basin Consulting Group

Attachments: Topographic Map, Project Area, Draft Cultural Resources Report

RESUMES



Education B.A. Anthropology, University of San Francisco

Professional Experience

Great Basin Consulting Group LLC, Carson City, Nevada

April 2014 to present

Director: Michael Drews created Great Basin Consulting Group LLC in April 2014 after a long tenure with Gnomon, Inc. Great Basin Group specializes in cultural resource consulting, field inventories, predictive models, and National Register evaluations. Mr. Drews has over 40 years of experience conducting archaeological research in the Great Basin, California and the Pacific Northwest, with thirteen years of experience developing and implementing cultural resource models using GIS. Mr. Drews has provided his expertise for a wide range of projects in the Great Basin, California, and the Pacific Northwest including archaeological survey/inventory/testing/data recovery; historic contexts; geomorphology; faunal analysis; collection management; public outreach; historic architecture, National Register evaluations, and Section 106, NEPA and CEQA regulatory compliance for federal, state and municipal governments, private industry, land developers, the military and the scientific community in the western United States. Mr. Drews is familiar with ESRI ArcView, ESRI ArcGIS 10.x, geodatabases, and GeoMedia, Trimble Pathfinder Office, GPS and Total Station mapping. Mr. Drews was previously listed as Principal Investigator in Prehistoric and Historic archaeology on BLM Nevada, Oregon, and Washington Cultural Resource Permits

Gnomon, Inc., Carson City, Nevada

2000 to March 2014

Cultural Resource Project Manager: Michael Drews managed cultural resource related projects for Gnomon, specializing in creation of cultural resource management systems, cultural resource inventories, predictive models, and National Register Evaluations.

Nevada Department of Transportation Carson City, Nevada

1991 – 2000

Archaeologist II: Nevada Department of Transportation, Carson City. Plan, coordinate, and supervise archaeological field projects related to development of highway right-of-way and materials sources

Intermountain Research Silver City, Nevada

1982 – 1991

Staff Archaeologist: Coordinated and supervised archaeological field projects, managed mapping, drafting and graphics department.

Ancient Enterprises, Santa Monica, California

1978-1982

Staff Archaeologist. Supervised archaeological field projects in the Great Basin and Chumash cultural area of Southern California. Responsible for project budget, logistics and report preparation.

ARCHEOTEC, Inc, Oakland California

1976-1978

Archaeologist. Archaeological testing and monitoring of historic period sites and cargo ship remains in San Francisco, California.

Appointments

Carson City Historic Resources Commission

1989 – present

Appointed to the Carson City Historic Resources Commission by the Carson City Board of Supervisors. Advises Board of Supervisors on matters concerning identification, designation, preservation and enhancement of sites and structures of historic significance. Elected Commission chairman 2004 -2013 and 2016.

Preserve Nevada

2015-present

Preserve Nevada is a statewide nonprofit organization dedicated to the preservation of Nevada's cultural, historical, and archeological heritage. In partnership with the University of Nevada, Las Vegas, and the National Trust for Historic Preservation, Preserve Nevada purpose is to help identify and meet the special needs of Nevada's preservation community. Member of Board of Directors

Sierra Front, Northwest Great Basin Resource Advisory Council

2009 – 2012

Appointed to the Sierra Front/Northwest Great Basin Resource Advisory Council by the Secretary of the Interior. RAC recommendations address all public land issues, including: land use planning, recreation, noxious weeds, and wild horse and burro herd management areas.

Carson River Advisory Committee

1994-1997

Appointed to the Carson River Advisory Committee representing Cultural Resource, Native American and V&T Railroad issues. Development and implementation of the Carson River Master Plan.

Cultural Resource Projects

- | | |
|-----------|--|
| 2014-2017 | Conducted various Cultural Resource Inventory, Cultural Resource Monitoring, Cultural Resource Sensitivity Modeling, GIS development and spatial analysis projects for Great Basin Consulting Group, LLC. Clients included engineering firms, local governments, mining companies, and public utilities. |
| 2000-2014 | Cultural Resource Inventory projects, Cultural Resource Information System Development and Cultural Resource Sensitivity Modeling for Gnomon, Inc. GIS/database programming and spatial analysis. |
| 2007 | Data conversion of selected archival records and maps at the Northwest Information Center and North Coastal Information Center/ California Office of Historic Preservation for Natural Resource Conservation Service |
| 2004 | An Examination of Fire Effects on Prehistoric Period Cultural Resources in Nevada. With MACTEC Engineering, conducted a study on the effects of fire on selected classes of cultural resources for the Nevada Bureau of Land Management. |

- 2004 Cultural Resources Predictive Modeling for the Humboldt Toiyabe National Forest. Created an environmental based cultural resource model for fire management and grazing on Forest Service lands.
- 2004-1979 Principal Investigator, Field Supervisor and Crew Chief for various cultural resource inventory and mitigation projects in Nevada, California, Oregon, and Wyoming.

Technical Reports

Drews, Michael P.

- 2017 A Class III Cultural Resource Inventory for Washoe County School District Arrowcreek School Site Acquisition, Washoe County, Nevada. Report submitted to USFS Humboldt Toiyabe National Forest Report Number R2017041702643
- Class III Cultural Resources Inventory for Washoe County School District R&PP School Site Lease, Sun Valley, Washoe County, Nevada. Report submitted to BLM Carson City District Report Number CRR3-2752
- A Class III Cultural Resource Inventory for the Mitchell Bank Stabilization Project along the West Walker River APN 012-332-014 and APN 012-361-039, Lyon County Nevada for the Mason Valley Conservation District. Submitted to US Army Corps of Engineers.
- A Cultural Resources Visual Assessment for the Proposed Evans Creek Disturbance Area Associated with Rancharrah Equestrian Village Development, Reno, Washoe County, Nevada. SPK-2017-01003 Submitted to US Army Corps of Engineers.
- A Class III Cultural Resource Inventory of the Meridian 120 Project, APN 038-120-03, 038-120-10, 038-120-12, 038-120-13, 038-090-61, 038-132-25, Verdi, Nevada for Wood Rodgers, Inc.
- A Class III Cultural Resource Inventory of the Dayton Valley Conservation District Bank Stabilization Projects 111C and 010C Lyon County, Nevada. Submitted to US Army Corps of Engineers.
- 2016 A Class III Cultural Resource Inventory of a 100 Acre Parcel (APN 008-52-120) associated with the Proposed Carson City Disc Golf Course near Flint Drive, Carson City, Nevada for Carson City Parks and Recreation Department. Submitted to Nevada State Historic Preservation Office.
- Architectural Inventory for the Truckee Donner Land Trust Spillway Modification Project at Van Norden Reservoir, Nevada and Placer County, California. Submitted to: John Svahn Truckee Donner Land Trust 10069 West River Street Truckee, California, 96162
- A Cultural Resource Overview of Jacks Valley Ranch APN 1419 00-001-033 and APN 1419-00-002-028. Submitted to: Nevada Land Trust P.O.Box 20288 Reno, Nevada 89515

A Class III Cultural Resource Inventory of the Dayton Valley Conservation District Bank Stabilization Projects MCR-48 and MCR-49 Lyon County, Nevada. Submitted to US Army Corps of Engineers, Reno Office.

A Class III Cultural Resource Inventory for the proposed Summit Club Development, Sierra Summit, LLC APN 049-384-04, Reno, Nevada for Wood Rodgers Inc. Submitted to City of Reno, Planning Department, on behalf of US Department of Housing and Urban Development CDBG Grant.

- 2015 A Class III Cultural Resource Inventory for the Verdi Bridge Scour Project (G772, B764) Verdi CMAR Project, Verdi, Washoe County, Nevada Report Prepared for Wood Rodgers Inc, Submitted to Nevada Department of Transportation, NDOT: WA15-041R, Federal Highways Administration FHWA: NHP-080-1(170).

Historic Resources Evaluation Report of P-26-005900 associated with Hazard Tree Removal along US HWY 395 Postmile 114.69 to 115.20, Mono County, California. Liberty Utilities (CALPECO ELECTRIC) LLC 701 National Avenue Tahoe Vista, CA 96148, Angie Calloway Eastern Sierra Environmental Branch Chief CALTRANS District 9

Class III Cultural Resources Inventory for Burke Creek-Rabe Meadows Complex Restoration Plan, Phase I and Phase II, Douglas County, Nevada. Submitted to USFS Lake Tahoe Basin Management Unit South Lake Tahoe, California. Report #R2015051900026

A Class I Cultural Resources Inventory for Proposed DWSRF Downtown Streetscape Project, Carson City, Nevada. Report prepared for Carson City Public Works Department, Nevada Department of Environmental Protection

A Class III Cultural Resource Inventory of the Au-Reka Gold Work Plan #3 Block Exploration Area, Lander County, Nevada BLM Report Number CRR 6-3124-1. Submitted to Bureau of Land Management Battle Mountain District Mt. Lewis Field Office Battle Mountain, Nevada

A Class III Cultural Resource Inventory Associated with AAR #10 Route Modifications to the Nevada Hospital Association, Nevada Broadband Telemedicine Initiative Project, Nevada. Report Prepared for National Telecommunications and Information Administration (NTIA), BLM Las Vegas District, Pahrump Field Office CRR 5-2692

Class III Cultural Resources Inventory for a Placement of a Proposed 1.82 Mile Aerial Fiber Optic Line on Timbisha Tribal Lands, Nye County, Nevada as part of the Nevada Broadband Telecommunications Initiative (NBTI) Report submitted to Bureau of Indian Affairs, Pacific Regional Office, Sacramento, California.

Class III Cultural Resources Inventory for a Placement of a Proposed 12.8 Mile Fiber Optic Line on Walker River Paiute Tribal Lands, Mineral County, Nevada as part of the Nevada Broadband Telecommunications Initiative (NBTI) Report submitted to Bureau of Indian Affairs, Western Regional Office, Phoenix, Arizona

- A Class I Archival Review for the Proposed Liberty Utilities Hazard Tree Removal and Pole Replacement, Tahoe City 7300 Phase 2 Rebuild Project 8800-0214-0597. Report prepared for Liberty Utilities (CalPeco Electric) LLC
- A Cultural Resources Report for Proposed Clean Water State Revolving Fund 2014 Sewer Replacement and Storm Water Improvements, Carson City, Nevada. Report Prepared for Carson City Public Works Department, Nevada Department of Environmental Protection
- A Class I Cultural Resources Inventory for Proposed DWSRF E-W Transmission Main Phase 2A-2, Carson City, Nevada. Report Prepared for Carson City Public Works Department, Nevada Department of Environmental Protection.
- A Class III Cultural Resource Inventory of a Six Acre Parcel at 2595 East Second Street, Reno, Nevada (APN 032-050-64) Report Prepared for Wood Rodgers, Inc, Submitted to Bureau of Indian Affairs Western Regional Office, Phoenix, AZ
- Addendum to A Class III Cultural Resource Inventory for the Liberty Utilities CalPECo 619 Line Replacement, Plumas County, California HRM 01-03-2014. Report prepared for Liberty Utilities (CalPeco Electric) LLC, Submitted to Plumas National Forest.
- 2014 A Cultural Resources Report for Proposed Clean Water State Revolving Fund 2014 Sewer Replacement and Storm Water Improvements, Carson City, Nevada. Report Prepared for Carson City Public Works Department, Nevada Department of Environmental Protection
- A Class III Cultural Resource Inventory Associated with AAR #6 Route Modifications to the Nevada Hospital Association, Nevada Broadband Telemedicine Initiative Project, Nevada. Submitted to National Telecommunications and Information Administration (NTIA), BLM Nevada, Carson City District, Stillwater Field Office Las Vegas District, Pahrump Field Office
- A Class I Archival Review for the Rancharra Development, Reno, Nevada. Report Prepared for Wood Rodgers, Inc, Submitted to Washoe County Planning Department
- A Class I Archival Review for the Proposed Liberty Utilities Hazard Tree Removal and Pole Replacement, Tahoe City 7300 Phase 2 Rebuild Project 8800-0214-0597. Report prepared for Liberty Utilities (CalPeco Electric) LLC, Submitted to U.S. Forest Service, Lake Tahoe Basin Management Unit.
- A Class III Cultural Resource Inventory of a Forty-five Acre Parcel (APN 007-091-15/APN 007-60-101) at the Head of Ash Canyon, Carson City, Nevada for Nevada Land Trust. Submitted to Bureau of Reclamation Mid-Pacific Region Sacramento, California
- A Class III Cultural Resource Inventory of APN 014-090-011, Sierra County, California for Truckee Donner Land Trust. Submitted to Bureau of Reclamation Mid-Pacific Region, Sacramento, California Tracking Number 15-LBAO-010
- 2013 A Class III Cultural Resource Inventory for the Liberty Utilities CalPECo 619 Line Replacement, Plumas County, California Report submitted to Plumas National Forest HRM 01-03-2014

Michael Drews



- 2010 Archaeological Survey for Three Mono County Transportation Enhancement Projects in the Towns of Walker and Bridgeport, Mono County, California. Report on file CALTRANS District 9, Bishop, California.
- 2009 *Virginia & Truckee Railway Reconstruction Project Halfway House (Or308/Ly918) and Emigrant Trail (CrNv03-1411) Data Recovery Report*. Contributions by Michael Drews, Jeremy Hall, William White and Charles Zeier. Prepared for Federal Highway Administration and Sierra Front Field Office, Bureau of Land Management. Michael P. Drews (editor) BLM Report Number CRR 3-1597.3.
- An Architectural and Archaeological Inventory of the American Flat Mill, Storey County, Nevada. Report submitted to BLM Carson City Field Office, CRR 3-2468, FDD070044.
- 2008 A Class III Cultural Resource Inventory along a Mountain Bike Trail In Ash Canyon, Carson City, Nevada. Report prepared for Carson City, Department of Parks and Recreation.
- A Class III Cultural Resource Inventory for a Proposed R&PP Land Exchange, Carson City, Nevada. BLM Carson City Field Office CRR 3-2468.
- Class III Cultural Resources Inventory Bluebird Fuels Reduction Project, Douglas County, Nevada. BLM Carson City Field Office CRR 3-2452.
- A Cultural Resources Inventory for Sierra Pacific Power Company #141 Line Rebuild Washoe County, Nevada. Humboldt Toiyabe National Forest Project Number R 2008 04 17 01869.
- Addendum to a Class III Cultural Resources Inventory for the Petersen Mountains Fuels Treatment Project, Washoe County, Nevada. Report prepared for BLM Carson City Field Office CRR 3-2314-1
- The Carson City Field Office Cultural Resources Model for Fuels Management. Prepared for Bureau of Land Management, Nevada State Office, Carson City Field Office.
- 2004 In The Black Prehistoric Cultural Resources Probability Model. Prepared for U.S. Forest Service, Humboldt-Toiyabe National Forest, Sparks.
- Bridgeport Grazing and Cultural Resources Probability Model. Prepared for U.S. Forest Service, Humboldt-Toiyabe National Forest, Sparks.
- Drews, Michael and Sarah Branch
- 2015 A Class III Cultural Resource Inventory of the DTL Treatment Properties for the Dayton Valley Conservation District, Lyon County, Nevada. Report sSubmitted to Bureau of Reclamation, Mid-Pacific Region Sacramento, California
- Drews, Michael P., Jeremy Hall
- 2012 A Class III Archaeological Inventory of the Bently Property (APN 010-011-24 and 010-011-25) along the Carson River as required by the Southern Nevada Public Lands Management Act (SNPLMA) Funding Agreement. Submitted to BLM, Sierra Field Office, Carson City, Nevada. BLM Report Number CR 3-2596.

Michael Drews



- 2010 Archaeological Survey for Three Mono County Transportation Enhancement Projects in the Towns of Walker and Bridgeport, Mono County, California. Report on file CALTRANS District 9, Bishop, California.
- Class III Cultural Resource Inventory for Canoe Hill II, Washoe County, Nevada. BLM Report: CRR-3-2539. Bureau of Land Management, Sierra Front Field Office, Carson City
- 2009 A Class III Cultural Resource Inventory for a 3 acre Expansion of the Bridgeport Sanitary Landfill, Bridgeport, California. Report on file Bureau of Land Management, Bishop Field Office.
- Archaeological Survey for the Proposed Pavement Rehabilitation of Swall Meadows Road, Near Toms Place, Mono County, California Federal Project No. ESPL-5947E-5016(037). Report on file CALTRANS District 9, Bishop, Ca.
- Cultural Resource Inventory for a Proposed R&PP Land Exchange, Carson City, Nevada (Ash Canyon Bike Trail). Field survey conducted Summer 2008. Final report submitted Spring 2009.
- Cultural Resource Inventory for a Proposed R&PP Land Exchange, Carson City, Nevada (Carson City Pioneer Cemetery). Field survey conducted Summer 2008. Final report submitted Spring 2009.
- Drews, Michael P. and Dayna Giambastiani
- 2016 Cultural Resources Overview of the Heinz Ranch, South Parcel (approximately 1378 acres) for the Stone Gate Master Planned Community, Washoe County, Nevada. Submitted to: Heinz Ranch Company, LLC 2999 Oak Road, Suite 400 Walnut Creek, CA 94597
- Drews, Michael P. and Dayna Giambastiani
- 2016 A Class III Cultural Resource Inventory for Sky View Parcels in Carpenter Valley, Nevada County, California for Truckee Donner Land Trust. Submitted to Bureau of Reclamation, Sacramento, California 16-LBAO-139.
- Drews, Michael P. and Mark Giambastiani
- 2016 Archaeological Survey for the Proposed STIP Project 'FC' Pavement Rehabilitation Project in Susanville, Lassen County, California PPNO 2510, Federal ID Project Number 5115(016). Submitted to: City of Susanville Public Works Department 720 South Street Susanville, California 96130, CALTRANS District 2, Office of Local Assistance.
- Drews, Michael P., Jeremy Hall, Eric Ingbar, and Christopher Noll
- 2013 *Cultural Resource Model and Class III Inventory for Owyhee Land Exchange – Research Design*. Submitted to Bureau of Land Management, Boise District. GSA Contract Number GS10F0577N, Order Number L12PD01714.
- Drews, Michael P., Jeremy Hall, Charles Zeier, and Ron Reno
- 2010 Class III Cultural Resource Inventory for the Ione Wildland –Urban Interface Defense Project, Nye County, Nevada. Submitted to: Battle Mountain Field Office, Bureau of Land Management. GSA Contract number GS10F0577N, Order Number L08PD01931.
- Drews, Michael, Eric Ingbar, and Jeremy Hall

Michael Drews



- 2012 Site and Previous Survey Database. In **A Prehistoric Context for Southern Nevada**, Heidi Roberts and Richard Ahlstrom editors. Prepared for Bureau of Land Management, Bureau of Reclamation, Nevada State Historic Preservation Office, Southern Nevada Agency Partnership, USDA Forest Service, U.S. Fish & Wildlife Service, National Park Service
- Drews, Michael and Mary Parrish
- 2013 A Class III Cultural Resource Inventory for the Carson City Parks and Recreation Single Track Trail. Report Submitted to Nevada State Parks and Federal Highway Administration.
- Drews, Michael P. and Michelle Schmitter
- 2016 A Cultural Resource Inventory and Architectural Evaluation for the Proposed Alpine County Behavioral Health Center, near Woodfords, Alpine County, California. Submitted to Alpine County Community Development 50 Diamond Valley Road Markleeville, CA 96120
- Drews, Michael P. and Michelle Schmitter
- 2016 Visual Effects Analysis of the Fox Peak Development for the Fallon Paiute Shoshone Tribe, Inc. Submitted to: Bureau of Indian Affairs Western Regional Office 2600 North Central Avenue Phoenix, Arizona 85004-3008
- Drews, Michael P. and Michelle Schmitter
- 2016 A Class III Cultural Resource Inventory for the Fernley Downtown Revitalization Project, Fernley, Nevada for Wood Rodgers Inc. Submitted to City of Fernley, Nevada on behalf of US Department of Housing and Urban Development CDBG Grant.
- Drews, Michael P. and Shelly Tilley
- 2008 Steamboat Hills/Toll Road Cultural and Ethnographic Synthesis. Report prepared for BLM Carson City Field Office CRR 3-2368
- Eckerle, William, Eric Ingbar, Sasha Taddie, Judson Finley, Michael Drews, and Mary Hopkins
- 2011 *Forecasting Landscape Settings Conductive to Site Burial*. Archaeology in 3D. Deciphering Buried Sites in the Western U.S. Matthew Sneddon, Heidi Roberts, and Richard V.N. Ahlstrom eds. Society for American Archaeology, The SAA Press, Washington D.C.
- Hall, Jeremy, Michael Drews, Eric Ingbar and F. Kirk Halford
- 2015 GIS Modeling of the Owyhee Country of the Snake River Plain, Idaho: Creative Approaches to Section 106 Compliance. **Idaho Archeologist**, Vol 38, No. 1, pp 2-15
- Hall, Jeremy and Michael Drews
- 2008 Addendum to a Class III Cultural Resource Inventory for the Western Nevada Materials (formerly American Ready Mix) Materials Pit Expansion, near Tracy, Washoe County, Nevada..
- 2007 *A Class III Cultural Resource Inventory for a Proposed R&PP Land Exchange, Carson City, Nevada*. Gnomon, Inc., Project Report 2008-13, Report prepared for Carson City, Department of Parks and Recreation.
- Drews, Michael P., Eric Ingbar, and Jeremy Hall

Michael Drews



- 2007 *A Test of the Great Basin Restoration Initiative Cultural Resources Sensitivity Model*. Prepared for Bureau of Land Management, Nevada State Office GSA Contract GS10F0577N Order FAD 060115
- Zeier, Charles, Ron Reno, and Michael Drews
2009 *An Architectural and Archaeological Inventory of the American Flat Mill, Storey County, Nevada*. Submitted to: Sierra Front Field Office, Bureau of Land Management. BLM Report Number CRR 3-2408.
- A Historic Context for Ione, Located in the Union Mining District, West-Central Nevada*. Submitted to: Battle Mountain Field Office, Bureau of Land Management. GSA Contract number GS10F0577N, order number L08PD01680, requisition number R-0810302
- Zeier, Charles, Ron Reno, Mike Drews, and Jeremy Hall
2012 *A Class III Archaeological Inventory Conducted on Behalf of the North Elko Pipeline Project, Elko and Eureka Counties, Nevada*. Submitted to the BLM, Tuscarora Field Office, Elko, Nevada. BLM report CRR 01-2934. Prepared by Zeier and Associates and Gnomon, Inc.
- Clay, Vickie, Michael P. Drews, Eric Ingbar, Ron Reno, and Charles Zeier
2005 *Wildfire and Eligibility: An Examination of Fire Effect on Prehistoric Period Cultural Resources in Nevada*. Prepared for Bureau of Land Management, Nevada State Office GSA Contract GS10F0157K Order FAQ 030047
- Drews, Michael, Eric Ingbar, and Alyce Branigan
2004 *Great Basin Restoration Initiative Cultural Resources Landscape Level Planning Model*. Nevada Cultural Resources Publications Series Report No. 14. Nevada Bureau of Land Management, Reno.
- Drews, Michael and Eric Ingbar
2004 *Technical Report: Cultural Resources Analysis and Probability Model for the Bureau of Land Management, Ely District*. Submitted to ENSR International 1601 Prospect Way, Fort Collins, Colorado.
- Drews, M., E. Ingbar, D. Zeanah, and W. Eckerle
2004 *A Cultural Resources Model for Pine Valley, Nevada*. Final Report on Department of Energy Agreement DE-FC26-01BC15337. Nevada Cultural Resources Publications Series Report No. 13. Nevada Bureau of Land Management, Reno.
- Harder, David A., Christopher D. Noll, Michael P. Drews, Jeremy N. Hall, John J. Creighton, John L. McNassar III, and Kelly M. Derr
2012 *A Cultural Resources Inventory of the Buckhorn Mountain Exploration Project, Okanogan County, Washington*. Submitted to Kinross Gold Corporation and Echo Bay Exploration. Submitted by Plateau Archaeological Investigations, Pullman, Washington and Gnomon, Inc., Carson City, Nevada.

Professional Papers

- 2016 Soldering Across the Great Basin. Paper presented at the 35th Great Basin Anthropological Conference, Reno, Nevada. With Lou Ann Speulda-Drews
- 2012 Lincoln County Transportation Context. Paper presented at the 34th Great Basin Anthropological Conference, Stateline, Nevada. With Charles Zeier, Ron Reno, and Jeremy Hall.
- 2010 Working Beneath the Canopy: LiDAR as an Aid in Locating Historic Mining Features in Areas of Marginal Surface Visibility. Paper presented at the 44th Annual Conference on Historical and Underwater Archaeology, Austin, Texas. With David Harder, Chris Noll and Jeremy Hall.
- LiDAR as an Effective Tool for Locating Historic Mining Features at Buckhorn Mountain in Northeastern Washington. Poster Session. 44th Annual Conference on Historical and Underwater Archaeology, Austin, Texas. With David Harder, Chris Noll and Jeremy Hall.
- LiDAR as an Aid in Locating Historic Mining Features in Areas of Poor Surface Visibility. 32nd Great Basin Anthropological Conference, Layton, Utah. With Christopher Noll, David Harder, and Jeremy Hall
- Utilizing LiDAR as a Survey Tool on Buckhorn Mountain. Poster Session. 32nd Great Basin Anthropological Conference, Layton, Utah. With Christopher Noll, David Harder, and Jeremy Hall
- 2008 A Cultural Resources Model for Fuels Management. 31st Great Basin Anthropological Conference, Portland Oregon.
- 2006 Forecasting Geological Settings of Buried Sites Using Geological and Soils Mapping Within a Geographic Information System 30th Great Basin Anthropological Conference, Las Vegas Nevada. With William Eckerle, Eric Ingbar, Judson Finley, Mary Hopkins and Sasha Taddie
- 2004 Home on the Range: Probability Modeling as a Management Tool - A Fresh Look. 29th Great Basin Anthropological Conference, Sparks Nevada. With Alyce Branigan and J. Einhorn
- 2002 Nevada Cultural Resources Information System. 28th Great Basin Anthropological Conference, Elko Nevada.

Professional Affiliations

Great Basin Archaeological Association
Society for California Archaeology
Society for Historic Archaeology
Society for American Archaeology