EXHIBIT A4

COUNTY OF LAKE
COMMUNITY DEVELOPMENT DEPARTMENT
Planning Division
Courthouse - 255 N. Forbes Street
Lakeport, California 95453
Telephone: (707) 263-2221 FAX: (707) 263-2225

April 7, 2026

CALIFORNIA ENVIRONMENTAL QUALITY ACT ENVIRONMENTAL CHECKLIST FORM INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION PL-25-71

1. Project Title:	Pasta Farms 3
2. Permit Numbers:	PL-25-71 Major Use Permit & Initial Study
3. Lead Agency Name and Address:	County of Lake Community Development Department Courthouse, 3rd Floor, 255 North Forbes Street Lakeport, CA 95453
4. Contact Person:	Mary Claybon, Senior Planner (707) 263-2221
5. Project Location(s):	10750 Seigler Springs North Road, Kelseyville (cultivation) APN 115-004-05 (37.4 acres) 10417 Seigler Springs North Road, Kelseyville (cultivation) APN 115-004-01 (133.4 acres) 10800 Diener Drive, Kelseyville (cultivation) APN 011-069-48 (105.74 acres) 10833 Diener Drive, Kelseyville (cultivation facilities) APN 115-004-08 (64.06 acres) 9864 Diener Drive, Kelseyville (clustering) APN 115-001-21 (20.13 acres) 9954 Diener Drive, Kelseyville (clustering) APN 115-001-29 (6.26 acres)

	11000 Diener Drive, Kelseyville (clustering) APN 115-004-07 (18.4 acres) 11000 Diener Drive, Kelseyville (clustering) APN 115-006-18 (17.26 acres) 9954 Salmina Road, Kelseyville (clustering) APN 115-005-03 (193.38 acres) 10415 Seigler Springs North Road, Kelseyville (clustering) APN 011-047-06 (6.45 acres)
6. Parcel Size:	602.48 Total Acres
7. Project Sponsor's Name & Address:	1833 DS, LLC / Peter Simon 200 4th ST. #400 Santa Rosa, CA 95404
8. General Plan Designation:	Agriculture and Rural Lands
9. Zoning:	A-RL-B5 District
10. Supervisor District:	District 5
11. Flood Zone:	"D": Areas of undetermined, but possible, flood hazard risk
12. Slope:	The proposed cultivation site is relatively flat with some moderately sloped areas, overall ranging from 0 to 10 percent. The proposed processing building and nursery building location ranges from 10 to 20 percent.
13. Fire Hazard Severity Zone:	Moderate Risk
14. Earthquake Fault Zone:	None
15. Dam Failure Inundation Area:	Not located within Dam Failure Inundation Area

16. Description of project:

The applicant, 1833 DS LLC / Peter Simon, is requesting discretionary approval from the County of Lake for an amendment to Major Use Permit identified as PL-25-71 for cultivation of 30.11 acres of commercial cannabis canopy, Type 4 Nursery, and a Type 13 Distributor, Self transport only license at project parcels 10750 and 10417 Seigler Springs North, 10800 and 10833 Diener Drive Kelseyville, (APNs 115-004-05; 115-004-01; 115-004-08; and 011-069-48). The remaining parcels are utilized for clustering purposes only. The project site is currently developed with 20 acres outdoor cannabis canopy area and supporting infrastructure, site access, parking, and utilities. The site was historically used for traditional agricultural operations. The existing conditions and current operation of the project site are described in greater detail below.

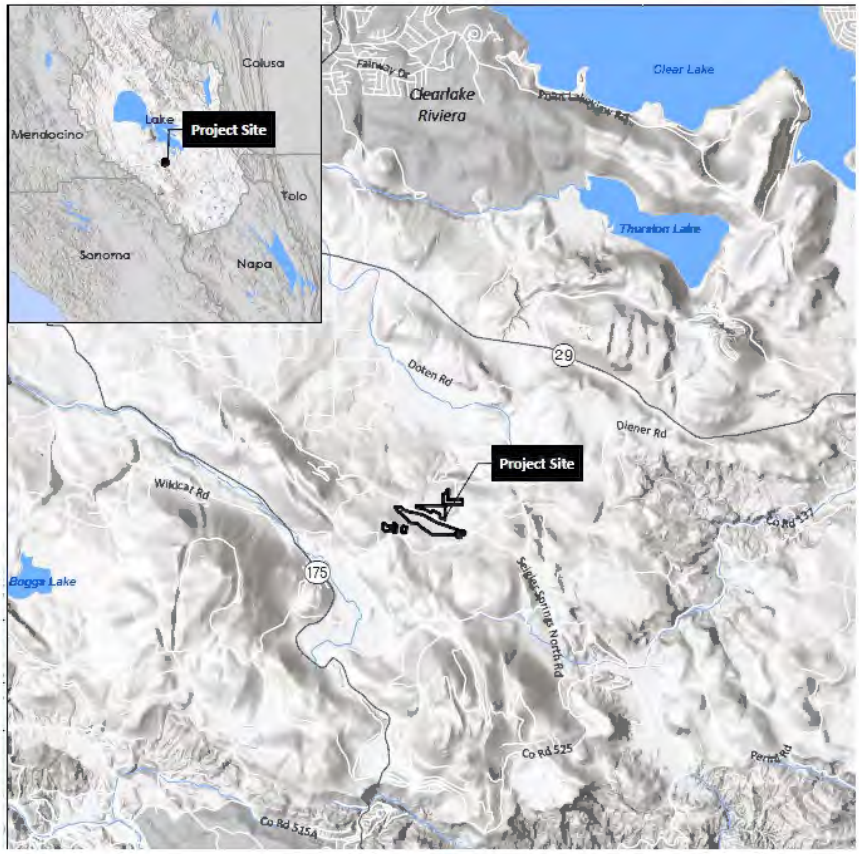
The commercial cannabis cultivation facility was approved on April 4, 2022, under Use Permit (UP 20-11) . The initial outdoor cannabis cultivation and processing area under this phase only occurred

on Assessor's Parcel Numbers (APNs) 115-004-01 and 115-004-05. The project is approved for the following:

- 11 acres of outdoor commercial cannabis canopy
- removal of existing vineyards
- construction of a 27,201-square-foot (sf) facility
- installation of temporary hoop houses for shading
- construction of four 22,000-sf greenhouses
- installation of fencing
- improvement of internal dirt/gravel roads for access to cultivation areas,
- utilization of a 300,000-gallon agricultural water storage tank for fire suppression and water management
- and construction of a pesticide storage shed,
- compost shed
- secured cannabis waste container

An amendment, Phase II expansion of the cannabis cultivation facility was approved on April 19, 2023, under (UP 22-31), which expanded the total outdoor cannabis cultivation canopy from 11 to 20 acres. Under this phase, outdoor cannabis cultivation and processing remained on APNs 115-004-01 and 115-004-05.

Figure 1. Vicinity Map



Source: Helix Environmental Planning, 2025

The project site is accessed by State Route (SR) 29 between Lakeport and Lower Lake via Diener Drive or by SR 175 between Middletown and Kelseyville via Seigler Spring Road from Loch Lomond. The elevation of the proposed project site ranges from 2,560 to 2,920 feet above mean sea level. Seigler Springs North Road traverses the project site from northwest to southeast. The project property is bordered to the north by densely wooded land, to the east by densely wooded rural residential land and a single-family residence, to the south by densely wooded land and Diener Drive, and to the west by densely wooded rural residential land with single family residences.

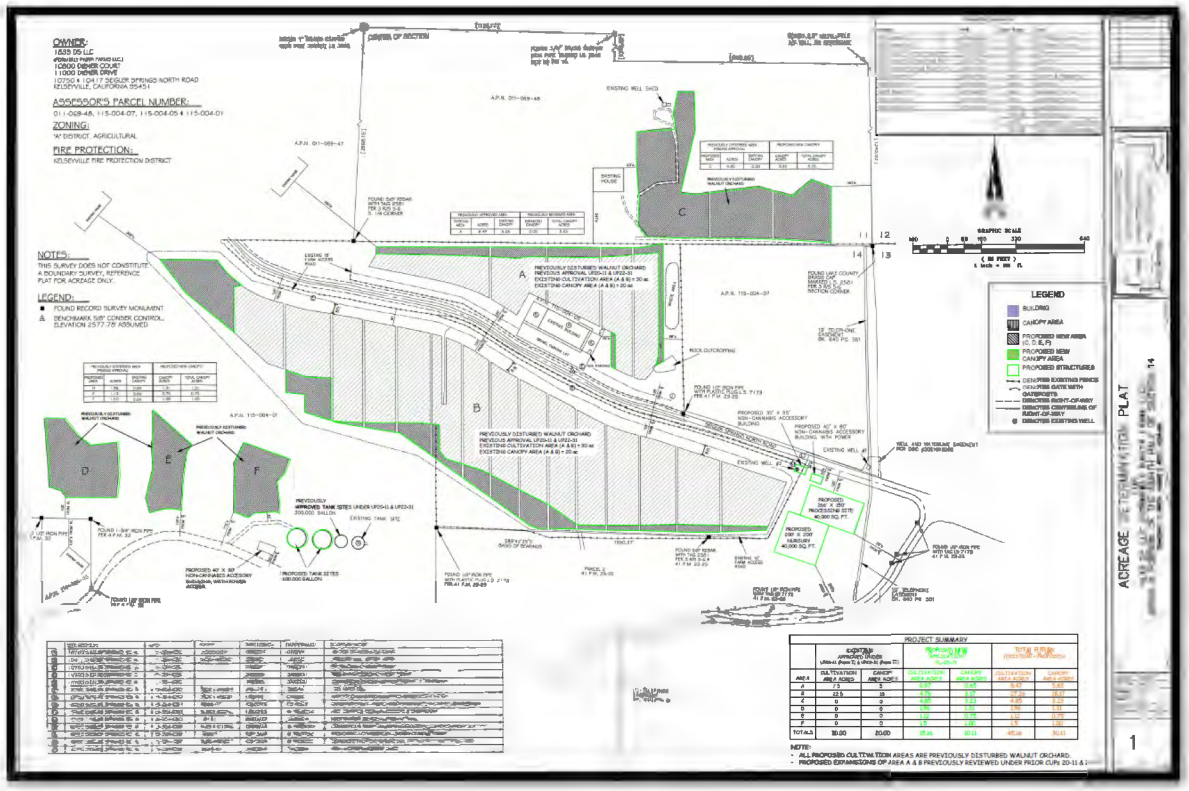
The project proposes the following improvements:

- 39,900 sf processing building
- 40,000 sf nursery building
- 1,925 sf accessory structure
- 3200 sf accessory structure
- Two 600,000 gallon water storage tanks
- Expansion to Garden A for .65 acres outdoor commercial cannabis canopy
- Expansion to Garden B for 3.17 acres outdoor commercial cannabis canopy
- Garden C for 3.23 acres
- Garden D for .65 acres
- Garden E for .75 acres
- Garden F for 1 acre

Table 1. MATURE CANNABIS CANOPY

Area	Approved		Proposed New		Total
	Canopy (acres)		Canopy (acres)		Canopy (acres)
Area A	5.00		0.65		5.65
Area B	15.00		3.17		18.17
Area C	0.00		3.23		3.23
Area D	0.00		1.31		1.31
Area E	0.00		0.75		0.75
Area F	0.00		1.00		1.00
Total:	20.00		**10.11**		**30.11**

Figure 2. - Site Plan



Source: Conser Land Surveying, 2024

Licensing Requirements

The applicant is seeking issuance of the following licenses from the Department of Cannabis Control: Type 4 Nursery for immature plants, Type 5 cultivation, and Type 13 Distribution, Self-transport of commercial cannabis and cannabis products between licensed facilities. The Type 13 license is considered an accessory use to an existing cannabis cultivation or manufacturing license, provided that the site holds a valid minor or major use permit. In accordance with Article 27, Section 11(ay) of the Lake County Zoning Ordinance, the parcel designated for distributor transport-only operations must have direct access to a publicly maintained road or an access easement thereto. The permit holder is restricted to transporting only cannabis products that have been cultivated by the permittee. All distribution activities unrelated to transportation must be conducted within a secure, locked structure. The applicant is required to adhere to all guidelines for Distributor Transport-Only Licenses as specified by the California Department of Cannabis Control's Title 4, Division 19, Chapter, particularly those described in §15315.

Water Use

Two 600,000-gallon water storage tanks are proposed southeast of cultivation Area F and west of the existing 300,000-gallon water storage tank on APN 115-004-01. It should be noted that an additional 300,000-gallon water storage tank was previously approved for construction in this area; however, it is not part of the proposed project and has not been constructed yet.

The cannabis cultivation facility currently receives water from the two existing irrigation wells on the project site, Well 1 and Well 2, that are dedicated for cannabis cultivation. Under the proposed project, water from these two existing wells would continue to be used to irrigate the

outdoor cannabis cultivation Areas A and B, the proposed canopy on Areas C through F, and the proposed cultivation within the new nursery building. Additionally, water from the wells would be pumped and stored in the approved 300,000-gallon water storage tanks (one existing) and the two proposed 600,000-gallon water storage tanks.

Irrigation within the proposed nursery building would occur year-round. Typically, immature plant irrigation would begin at 5,000 gallons per week for the first eight weeks of the calendar year. This would increase to 10,000 gallons per week from the week of March 26 through the week of April 30, before peaking at 25,000 gallons per week from the week of May 7 through the week of July 2. The demand would then return to 5,000 gallons per week for the remainder of the year. The purpose of the fully enclosed nursery building is to maintain high internal humidity levels to decrease plant transpiration, thereby requiring reduced irrigation as compared to other cultivation methods.

Water use required for dust control on site would be seasonal and would typically range from 2,000 gallons per week during cooler months to 3,000 gallons per week during the drier summer and fall months. It is estimated that each employee would use 15 gallons of water on site per day, for a total of 2,100 gallons per week throughout the year, assuming a maximum of 20 employees on site at a time. This would be an increase of approximately 525 gallons per week from current conditions.

Based on the values estimated above for water use for cannabis cultivation and non-irrigation purposes, the total annual water use on-site would be 107.37 AFY with approval of the proposed project. This is inclusive of the 58.86 AFY of water used under existing cultivation conditions.

Construction

Construction of the proposed project is anticipated to begin Spring of 2026 and be completed in Fall of 2027, for a total construction time frame of approximately 18 months. Construction of the proposed project would include site preparation, grading, trenching for underground utilities, and building construction. Grading is for the access road, building pads for the accessory structures, and removal of the 362 oak trees to be replaced. All grading and earthwork would be in compliance with Chapter 30, Grading Ordinance, of the Lake County Municipal Code. Per the project engineer, no off-site export of debris, vegetation, or soil would be required. Construction activities would be limited to Monday through Friday, between the hours of 7:00 a.m. and 7:00 p.m. No construction activities on weekends are proposed.

Operations

Operation the proposed project would involve the cultivation of flowering cannabis plants within the six outdoor mature cultivation areas and the new propagation of immature plants within the proposed building. On-site flowering operations would occur in cultivation Areas A-F, while the proposed processing building would be utilized for propagation and vegetation cannabis cultivation. The plants would be moved to one of the garden areas to mature with full sun. Once harvested, the plants would be dried and trimmed in the existing and proposed processing buildings, before being bulk packaged for seasonal transfer to an off-site facility.

The proposed project would increase the maximum number of employees from 15 to 20 workers at any given time. The facility would remain closed to the public, and normal working hours would continue to be Monday through Friday, 7:00 a.m. to 4:00 p.m. The project may also continue to operate on Saturdays and Sundays on occasion during peak season. Deliveries of harvested product to an off-site distribution facility would occur seasonally, and

all deliveries or pickups would take place from Monday through Saturday between the hours of 7:00 a.m. to 7:00 p.m. and Sundays from 12:00 p.m. to 5:00 p.m.

Grading and Tree Removal

The applicant proposes to develop approximately 1.8 acres of their property for the construction of a cannabis nursery building and processing facility. Preparing the proposed site for development will require the conversion of an established oak woodland.

The project site was evaluated and surveyed by Jacobszoon and Associates on September 11, 2024. The project area is occupied by a dense, primarily even-aged stand of California black oak with scattered overstory ponderosa pine. Understory vegetation on site is comprised of annual grasses, manzanita and oak and regeneration. Trees to be removed under the proposed project include oaks ranging in size from 6" to 34" diameter at breast height (DBH), with the average stem being approximately 10" DBH. The average height of oaks on site is approximately 40 feet. A census survey of the site produced a total of three hundred sixty-two (362) black oaks and six (6) ponderosa pines. It is anticipated that all 362 oaks will be removed during the conversion operation to prepare the site for development.

The Oak Woodlands Protection Act and the County of Lake identify mitigation standards for projects that convert oak woodland to another use. Under the Oak Woodlands Protection Act, Lake County shall require one or more oak woodland alternatives "to mitigate the significant effect of the conversion of oak woodlands." Alternatives to mitigate the significant effect of the conversion of oak woodlands include replacing removed trees at a rate of 3:1 and maintaining these trees pursuant to Section 4526 of Senate Bill No. 1334, terminating seven years after the trees are planted. To comply with the California Oak Woodlands Conservation Act, oaks removed from the site will be replaced at a 3:1 ratio. Suitable planting sites exist surrounding the conversion area primarily to the south and west. One thousand eighty-six (1,086) black oaks will be planted, protected and irrigated for seven years to mitigate tree removal within the woodland. The removal of this amount of trees triggers a Complex Grading Permit to be obtained, and all grading and earthwork would be in compliance with Chapter 30, Grading Ordinance, of the Lake County Municipal Code. See Biological Resource Section of this Initial Study for more information.

Figure 3 - Oak Tree Mitigation Site Plan

Source: Jacobszoon & Associates, 2024

Figure 4 - Oak Tree Mitigation Site Plan (Zoomed to Conversion Area)

Source: Jacobszoon & Associates, 2024

Figure 4 – Oaks to be Removed

Source: Staff site visit March 18, 2026

Stormwater and Erosion Control

The site is enrolled in the State Water Board's Order No. WQ 2019-001-DWQ as a Tier 2, Low Risk site. As required in the Cannabis Order's Policy for coming into compliance with Best

Practicable Treatment or Control (BPTC) measures, the applicant had to prepare a Site Management Plan (SMP) and a Nitrogen Management Plan (NMP) within 90 days of enrollment. “The purpose of the Cannabis Policy is to ensure that the diversion of water and discharge of waste associated with cannabis cultivation does not have a negative impact on water quality, aquatic habitat, riparian habitat, wetlands, and springs” (State Water Board, 2019).

BPTC measures have been implemented at the site for erosion control and stormwater pollution. The purpose of the NMP is to identify how nitrogen is stored, used, and applied to crops in a way that is protective to water quality. The applicant is required to complete online Annual Monitoring and Reporting to assess compliance with the Cannabis General Order and Notice of Applicability. This includes BPTC measures for winterization.

17. Environmental Setting and Existing Conditions:

The proposed amendment to use permit for commercial cannabis cultivation project is located at 10750 and 10417 North Seigler Springs Road, as well as 10800 and 10833 Diener Drive (APNs 115-004-05; 115-004-01; 011-069-48; and 115-004-08) is located on partially developed land in an agricultural setting and is surrounded by rural residential properties and undeveloped land. The Study Area is comprised of cropland (37.40 acres), urban areas (1.30 acres), ruderal/disturbed areas (10.21 acres), and montane hardwood-conifer forest (9.72 acres). The proposed project is located in the Cobb Mountain Planning Area. Access to the property is via North Seigler Road, which runs between parcel 115-004-01 and parcels 115-004-05 and 115-004-07. Surrounding land uses include rural residential properties, undeveloped forested land, and vineyards.

Figure 5 Aerial Imagery

Source: Lake County GIS, 2026

18. Surrounding Land Uses and Setting:

    As the parcel for the proposed project is over five (5) acres in size, neighboring parcels that fall within a 725-foot buffer will be notified of the project. These parcels include:

    - North: Zoned Rural Lands, Agriculture Preserve, and Rural Residential developed with some residential uses
    - East : Zoned Agriculture Preserve, and Rural Residential developed with some residential uses
    - South: Zoned Rural Lands and Rural Residential; undeveloped
    - West: Zoned Rural Lands, and Rural Residential developed with some residential uses

    As the parcel to the northeast of the proposed project is publicly owned land managed by the Bureau of Land Management (BLM), it is considered an exclusion zone. The County of Lake applies a 1,000 foot setback for project areas from publicly owned lands that are actively used and/or accessible by the public. The current project proposal does not fall within this setback and is clear from any public land exclusion areas. Other public agencies whose approval is required (e.g., Permits, financing approval, or participation agreement).

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

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

19. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

    Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and

conflict in the environmental review process, per Public Resources Code §21080.3.2. Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3 (c) contains provisions specific to confidentiality.

Notification of the project and offering consultation under AB-52 was sent to twelve Tribes with aboriginal territory in and around Lake County on October 20, 2025. Of the notified Tribes, the Middletown Rancheria responded to the notice stating the project falls within the Tribe's Area of Concern and requested tribal consultation. The consultation resulted in a monitoring agreement between the applicant and Tribe. Consultation was formally closed on March 17, 2026.

ATTACHMENTS:
Attachment 1: Site Plans
Attachment 2: Biological Assessment
Attachment 3: Hydrological Analysis
Attachment 4: Oak Tree Replacement Plan

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

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

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been

adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

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

Initial Study Prepared By:
Mary Claybon, Senior Planner
Community Development Department

Mary Claybon Date: April 7, 2026
SIGNATURE

SECTION 1

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, and then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c) (3) (D). In this case, a brief discussion should identify the following:
   a) Earlier Analysis Used. Identify and state where they are available for review.
   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures, which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:
   a) The significance criteria or threshold, if any, used to evaluate each question; and
   b) The mitigation measure identified, if any, to reduce the impact to less than significance

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

Discussion:

(a) The project site is located in the southwestern region of Lake County within the Cobb Mountain Area Plan. The Cobb Mountain Area contains many panoramic views and scenic highway viewsheds, including mountainous and hillside landscapes, agricultural and pastoral views, and riparian and natural resource areas. Important mountain viewsheds include those of Boggs and Cobb Mountains, Mount Hannah, and Seigler Mountain. Impressive meadow and wetland viewsheds are found in the Salminas and lower Cobb Valley areas. The Mayacamas Mountains provide a backdrop for much of the Cobb Mountain Area, including portions of the northern Geysers geothermal resource area (County 1989).

Scenic vistas are defined as expansive views of highly valued landscapes from publicly accessible viewpoints. The proposed project is located within a rural, primarily undeveloped area of Lake County and is surrounded by wooded areas. The proposed project site is located in a generally mountainous area; however, the northern cultivation areas are relatively flat, while the southern cultivation areas moderately slope downward from northeast to southwest. The project site is traversed by Seigler Springs North Road, which is a public road that provides views of the project site. The proposed project would expand the existing cannabis cultivation facility from 20 acres of outdoor cannabis cultivation canopy to 30.11 acres of canopy. The project would also construct a new processing building, nursery building, water storage tanks, non-cannabis accessory buildings, and associated utilities and infrastructure. The proposed project would introduce new aboveground structures; however, the perimeter of the existing cannabis cultivation facility is currently fenced with 6-foot security fencing. The segments of the 6-foot fencing along Seigler Springs North Road are currently installed with privacy slats to screen views of the project site. The project site is further screened from view by native trees that are maintained along the boundary of the project site along Seigler Springs Road. The trees are currently approximately five feet tall and are anticipated to grow up to 20 feet or more upon maturity. The proposed project components would be screened from view from Seigler Springs North Road by the existing perimeter fencing and trees, in compliance with General Plan Policy OSC-2.7, Landscaping Techniques. The view of the site on Seigler Springs North Road is not a scenic vista. The project site is located at the foot of a hill and is not a main thoroughfare road due to the nature of the road. The location is somewhat in a secluded area and does not contain a significant vantage point. Therefore, the project would not result in a substantial adverse effect to a scenic vista, and the impact would be less than significant.

Less than Significant Impact

b) The California Department of Transportation (Caltrans) manages the Scenic Highway Program and maintains a list of State Scenic Highways, which are codified in the California Streets and Highways Code. The nearest Scenic Highways that are eligible for listing at the State level are SR 29, located approximately 1.6 miles north of the project site; SR 53, located approximately 5.5 miles northeast of the project site; and SR 20, located approximately 9 miles north of the project site (Caltrans 2025).

There are no officially designated State Scenic Highways immediately adjacent to the project site. The nearest Scenic Highways that are eligible for listing at the State level are SR 29, located approximately 1.6 miles north of the project site; SR 53, located approximately 5.5 miles northeast of the project site; and SR 20, located approximately 9

miles north of the project site (Caltrans 2025). The project does propose tree removal, but due to distance and intervening topography and vegetation, the project site is not visible from SR 29, SR 53, or SR 20. Therefore, the proposed project would not damage scenic resources within the viewshed of a designated State Scenic Highway and the impact would be less than significant.

Less than Significant Impact

c) The project site is located in a generally rural area of the County, and publicly accessible areas with views of the site would include Seigler Springs North Road and Diener Drive. As such, viewer sensitivity to the visual character or quality of the project site would generally consist of motorists along Seigler Springs North Road. The proposed project components may result in a change to the visual character of the project site due to the development of new structures in an area that primarily consists of undeveloped and densely wooded land. However, as discussed in question a), the proposed structures and expanded cannabis cultivation areas would be screened from view from Seigler Springs North Road by the existing perimeter fencing and trees. The area of the project site visible from North Seigler Springs Road would remain largely similar to the existing views along this road, with the existing fencing and trees screening the cultivation areas from view. The expansion of the cultivation site is consistent with existing character of the area. The project currently operates with 20 acres of cannabis canopy and processing facility under the existing major use permit. Therefore, the proposed project would not substantially degrade the character of the site or its surroundings or degrade the quality of views from publicly accessible vantage points, and the impact would be less than significant.

Less than Significant Impact

d) The perimeter of the existing cannabis cultivation facility currently has motion-sensored lights along the fence line for security purposes, which are downcast to prevent light spillover onto adjacent land uses. Other sources of existing light and glare on the project site include interior and exterior lighting in the building on APN 115-004-05, parking lot lighting, and building windows. The interior of the proposed nursery building and processing buildings would contain LED lighting that would be designed to prevent light spillover outside of the property boundary, consistent with General Plan Policy OSC-2.13, Control of Light and Glare, and Policy OSC-2.14, Low Glare Building Materials. Lighting associated with the proposed project would be consistent with the existing light sources at the cannabis cultivation facility; therefore, the proposed project would not create a new source of substantial light or glare.

The project has some potential to create additional light and/or glare through exterior security lighting. The proposed use is an outdoor cultivation operation. The project does not involve cultivation using proposed greenhouses incorporating artificial lighting. The following mitigation measures will be implemented which would reduce the impacts to less than significant:

Less than Significant Impact with Mitigation Measures AES-1 through AES-3 incorporated:

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

AES-2: All indoor lighting shall be fully contained within structures or otherwise shielded to fully contain any light or glare. Artificial light shall be completely shielded between sunset and sunrise.

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

II. AGRICULTURE AND FORESTRY RESOURCES	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☒	☐
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☒	☐
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☒	☐

Discussion:

The Department of Conservation (DOC) Farmland Mapping and Monitoring Program (FMMP) prepares, updates, and maintains Important Farmland Series Maps as defined in subdivision (f) of Section 65560 of the Government Code, and prepares and maintains an automated map and data base system to record and report changes in the use of agricultural lands every two years on even numbered calendar years. Agricultural land is rated according to soil quality and irrigation status. For environmental review purposes under CEQA, the categories of Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Grazing Land constitute 'agricultural land' (Public Resources Code [PRC] Section 21060.1).

According to the DOC's California Important Farmland Finder, the project site is mapped as Unique Farmland and is bordered on all sides by Other Land (DOC 2025a). The project site is zoned Agricultural (A) and Rural Land, B5 District, 5-acre minimum (RL-B5). Prior to current use for cannabis cultivation, the property was historically farmed with walnut trees and grape vines.

(a) According to the FMMP, the project site is mapped as Unique Farmland. The proposed project would include the expansion of an existing cannabis cultivation facility and the construction of two 3,200-sf non-cannabis accessory buildings, a 1,925-sf non-cannabis accessory building, a 40,000-sf nursery building, a 39,900 sf processing building, and two 600,000-gallon water storage tanks. The proposed cannabis cultivation expansion would be consistent with the existing agricultural use of the site. The proposed structures would be required to support the proposed cannabis cultivation. Therefore, the proposed project would not convert Farmland to a non-agricultural use, and the impact would be less than significant.

Less than Significant Impact

(b) The parcels that comprise the overall applicant-owned property are zoned Agriculture (A), Rural Lands 5-Acre Minimum (RL-B5), or a combination of both. According to Article 27 of the Lake County Zoning Ordinance, cannabis cultivation is allowed on lands zoned Agriculture (A) and Rural Lands 5-Acre Minimum (RL-B5) with a Major Use Permit. The Williamson Act is State legislation that preserves agricultural land through a program that permits contracts between landowners and local government that keep contracted land in agricultural use in exchange for a lower property tax assessment. The project site is not enrolled in a Williamson Act contract. Therefore, the project impact would not conflict with zoning for agricultural use or the Williamson Act.

Less than Significant Impact

(c) Public Resources Code §12220(g) defines "forest land" as land that can support 10% native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.

Public Resources Code §4526 defines "timberland" as land, other than land owned by the federal government and land designated by the State Board of Forestry and Fire Protection as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees.

Government Code §51104(g) defines "timberland production zone" as an area that has been zoned pursuant to Government Code Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses.

The project site is located within a rural, primarily undeveloped area of Lake County and is surrounded by wooded areas. The project site is not zoned or otherwise designated as forest land or timberland. The project would not conflict with existing zoning of forest land, timberland, or timberland zoned Timberland Production. Therefore, no impact would occur.

No Impact

(d) The project site is located within a rural, primarily undeveloped area of Lake County and is surrounded by wooded areas. The project site is not zoned or otherwise designated as forest land or timberland. The project would not conflict with existing zoning of forest land, timberland, or timberland zoned Timberland Production. Therefore, no impact would occur.

No Impact

(e) As discussed above under question b), cannabis cultivation is allowed on lands zoned Agriculture (A) and Rural Lands 5-Acre Minimum (RL-B5) with a Major Use Permit. Therefore, proposed expansion of the existing cannabis cultivation facilities would not convert Farmland to non-agricultural use or forest land to non-forest use, and the impact would be less than significant.

Less than Significant Impact

III. AIR QUALITY	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☒	☐	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☒	☐	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐

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

Discussion:

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

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

According to the USDA Soil Survey and the ultramafic, ultrabasic, serpentine rock and soils map of Lake County, serpentine soils have not been found within the project area or project vicinity and would pose no threat of asbestos exposure during either the construction phase or the operational phase.

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

According to the Lake County Zoning Ordinance section on Commercial Cannabis Cultivation (§27.11), Air Quality must be addressed in the Property Management Plan. The intent of addressing this is to ensure that "all cannabis permittees shall not degrade the County's air quality as determined by the Lake County Air Quality Management District" and that "permittees shall identify any equipment or activity that may cause, or potentially cause the issuance of air contaminates including odor and shall identify measures to be taken to reduce, control or eliminate the issuance of air contaminants, including odors". This includes obtaining an Authority to Construct permit pursuant to LCAQMD Rules and Regulations.

The proposed project has the potential to result in short- and long-term air quality impacts from construction and operation of the proposed project.

Implementation of mitigation measures would reduce air quality impacts to less than significant. Dust during site preparation would be limited during periods of high winds (over 15 mph). All visibly dry, disturbed soil and road surfaces would be watered to minimize fugitive dust emissions.

Dust and fumes may be released as a result of vehicular traffic, including small delivery vehicles. Grading would be in compliance with Chapter 30, Grading Ordinance, of the Lake County Municipal Code. Additionally, implementation of mitigation measures below would further reduce air quality impacts to less than significant.

Less than Significant Impact with Mitigation Measures AQ-1 through AQ-6 incorporated:

AQ-1: Prior to obtaining the necessary permits and/or approvals for any phase, applicant shall contact the Lake County Air Quality Management District (LCAQMD) and obtain an Authority to Construct (A/C) permit for all operations and for any diesel-powered equipment and/or other equipment with potential for air emissions. Or provide proof that a permit is not needed.

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

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

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

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

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

(b) By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in the nonattainment of ambient air quality standards. Instead, the potential for a project's individual emissions to contribute to existing cumulatively significant adverse air quality impacts is evaluated.

Lake County is designated as attainment or unclassified with respect to the NAAQS and CAAQS, and therefore, has not adopted specific CEQA thresholds relating to air quality. As the LCAQMD does not have standards for thresholds of significance for criteria air pollutants, Bay Area Air District thresholds have been used in this analysis as the basis to determine if mitigation should be implemented. The Bay Area Air District has adopted thresholds which lead agencies can use to determine the significance of a development project's short-term construction and long-term operational pollutant emissions.

Construction Emissions

CalEEMod version 2022.1 was used to quantify project construction-period emissions. Construction of the proposed project is anticipated to begin April of 2026 and be completed in October 2027. The quantity, duration, and intensity of construction activity influence the amount of construction emissions and related pollutant concentrations that occur at any one time. As such, the emission forecasts reflect a specific set of conservative assumptions based on the expected construction scenario wherein a relatively large

amount of construction activity is occurring in a relatively intensive manner. Because of this conservative assumption, actual emissions could be less than those forecasted.

The project's construction period emissions of ROG, NO_X, PM_{10}, and $PM_{2.5}$ are compared to Bay Area Air District's daily construction thresholds in Table 4, Daily Construction Criteria Pollutant and Precursor Emissions. The Bay Area Air District does not have a recommended threshold for construction-generated CO and SO_X. The emissions estimate assumes the implementation of the Bay Area Air District recommended Basic Construction Mitigation Measures (BCMMs).The Bay Area Air District does not have a recommended threshold for construction-generated CO and SO_X. The emissions estimate assumes the implementation of the Bay Area Air District recommended Basic Construction Mitigation Measures (BCMMs) specifically watering exposed areas a minimum of twice per day and enforcing a 15 miles per hour speed limit on unpaved surfaces.

Operation of the proposed project would involve the continued cultivation of flowering cannabis plants within the six outdoor mature cultivation areas and the new cultivation of immature plants within the proposed nursery building. The proposed project would increase the maximum number of employees from 15 to 20 workers at any given time. However, this increase in employees would be minimal and would not result in a significant increase in vehicle trips related to current facility operations. Operation of the proposed project would not require new backup generators. The total annual water use on site would be 107.37 AFY with approval of the proposed project; however, this is inclusive of the 58.86 AFY of water used under existing cultivation conditions. Water sourced from public utilities results in GHG emissions from the energy required to source, treat, and transport the water over long distances. The existing and proposed annual water supply would be sourced from the two existing wells on the project site. Therefore, the change in water use and electricity used by the proposed project would be minimal in comparison to current facility operations. Changes in project operational emissions would be negligible compared to operational emissions from the existing facility. Therefore, project operational emissions were not quantified.

Less than Significant Impact with Mitigation Measure AQ-7 Incorporated:

AQ-7: Prior to obtaining the necessary permits and/or approvals for any phase of the project, the County shall specify on all grading, building, and other construction permits for the project, implementation of the following Basic Construction Mitigation Measures:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of the California Code of

Regulations). Clear signage shall be provided for construction workers at all access points.

- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator.
- Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The air district's phone number shall also be visible to ensure compliance with applicable regulations.

(c) Sensitive receptors (i.e., children, senior citizens, and acutely or chronically ill people) are more susceptible to the effects of air pollution than the general population. Land uses that are considered sensitive receptors typically include residences, schools, playgrounds, childcare centers, hospitals, convalescent homes, and retirement homes.

There are no schools, parks, childcare centers, convalescent homes, or retirement homes located in proximity to the project site. The closest existing off site residence is located approximately 300 feet west of the project site. This is greater than the required 200-foot setback for off-site residences from commercial cannabis cultivation, as described in Article 27.3 of the Lake County Zoning Ordinance. There are no schools located in the project vicinity.

Less than Significant Impact

d) The closest existing off site residence is located approximately 300 feet west of the project site. This is greater than the required 200-foot setback for off-site residences from commercial cannabis cultivation, as described in Article 27.3 of the Lake County Zoning Ordinance. The existing cannabis cultivation facility currently implements an odor control plan that limits and controls the cannabis odor such that it is undetectable outside of the premises. As part of the Property Management Plan. an Odor Control Program has been prepared. The Odor Control Program would identify equipment or activity that may cause or potentially cause the issuance of air contaminants including odors, and identify measures to be taken to reduce, control, or eliminate the issuance of air contaminants. The project would not result in other emissions adversely affecting a substantial number of people, and the impact would be less than significant

Less than Significant Impact

IV. BIOLOGICAL RESOURCES	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
c) Have a substantial adverse effect on state or federally protected wetlands (including, not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Discussion:

HELIX conducted a Biological Resources Assessment (BRA) in July 2024 for the proposed project, which includes the entire project area evaluated in this IS/MND as well as additional areas no longer included as part of the proposed project. The area referred to as Area C in the BRA is no longer included as part of the proposed project. The approximately 58.63-acre Study Area evaluated in the BRA is located on partially developed land in an agricultural setting and is surrounded by rural residential properties and undeveloped land. The 'Study Area' evaluated in the BRA is comprised of cropland (37.40 acres), urban areas (1.30 acres), ruderal/disturbed areas (10.21 acres), and montane hardwood-conifer forest (9.72 acres).

Montane hardwood-conifer forest habitat consists of a mix of hardwood species such as California black oak (*Quercus kelloggii*), canyon live oak (*Quercus chrysolepis*), Pacific madrone

(*Arbutus menziesii*), and fir (*Abies* spp.), as well as conifer species such as ponderosa pine (*Pinus ponderosa*), Douglas-fir (*Pseudotsuga menziesii*), and incense cedar (*Calocedrus decurrens*).

Approximately 9.72 acres of montane hardwood-conifer forest habitat occurs in the Study Area evaluated in the BRA. This habitat is located in area H, portions of the areas labeled cultivation Areas A, C, E, F, and G in the BRA, and within the buffers surrounding all other areas. The canopy of this habitat within the Study Area is fairly open and is comprised of ponderosa pine, California black oak, and knobcone pine (*Pinus attenuata*), and the understory is relatively bare, with some scattered common manzanita, hoary manzanita (*Arctostaphylos canescens*), and grassy species growing through the leaf litter.

a) "Special-status species" are species that are listed under the federal or California Endangered Species Acts, along with species of concern as designated by State or federal agencies or by organizations such as the California Native Plant Society. According to the database query, 56 listed and/or special-status plants have the potential to occur onsite or in the vicinity of the Study Area evaluated in the BRA. Below includes a summary of findings from the BRA related to impacts on sensitive species.

   Plants. The majority of the regional special-status plants identified in the query occur on serpentine or alluvial soils, within vernal pools or other aquatic habitats, or within other habitats or elevations that do not occur in the Study Area. Botanical Surveys were conducted on biological surveys conducted on April 26, 2024 and May 30, 2024. Based on field observations, published information, and literature review, one special-status plant is known to occur in the Study Area, Napa lomatium (*Lomatium repostum*), and no other special-status plants have potential to occur in the Study Area. Approximately 50 plants of this species were observed in the previously labeled cultivation Area C within the Study Area during the biological surveys conducted by HELIX on April 26, 2024, and May 30, 2024. This species is well documented in the region of the Study Area (CNPS 2024) but is not currently tracked in the CNDDB (CDFW 2024). This species' taxonomy is under review and was changed from a California Rare Plant Ranking (CRPR) 1B.2 to a 4.2 on May 12, 2023 (CNPS 2024). A follow-up survey for special-status plants was conducted on May 30, 2024, that focused on manzanita species and late-blooming species that may not have been identifiable during the initial site survey on April 26, 2024. No special-status plants besides Napa lomatium were observed in the Study Area. CRPR 4 taxa include plants that are of limited distribution or infrequent throughout a broader area in California, and their status should be monitored regularly but they are not listed under State or federal regulation. CRPR 4 taxa do not clearly meet CEQA standards. Impact considerations for Napa lomatium are not required for any CEQA analysis, and no measures are recommended for this species.

   Birds. Migratory birds and raptors protected under federal, State, and local laws/policies have potential to occur within the Study Area. Many migratory birds and raptors were observed in the Study Area during the field survey on April 26, 2024, including red-shouldered hawk (*Buteo lineatus*), black-headed grosbeak (*Pheucticus melanocephalus*), California quail (*Callipepla californica*), orange-crowned warbler (*Leiothlypis celata*), and ash-throated flycatcher (*Myiarchus cinerascens*). However, no active nests were identified during the field surveys. Regardless, suitable nest locations within and adjacent to the Study Area include trees, shrubs, grass, artificial structures, bare ground and ground-disturbing and other development activities including grading, vegetation clearing, tree removal/trimming, and construction could impact nesting birds if

these activities occur within the nesting season. Mitigation Measure BIO-1 recommends ground disturbing activities to take place outside of the nesting season; and requires pre-construction nesting bird surveys if activities occur within the nesting season.

Other Wildlife. According to the database query, 20 listed and/or special-status wildlife species have the potential to occur on site or in the vicinity of the Study Area (CDFW 2024, USFWS 2024a). Appendix B, *Potential for Special-status Species in the Region to Occur in the Study Area for the Pasta Farms Cannabis Expansion Project*, of the BRA provides a list of species, required habitat and an analysis of whether or not the species is likely to occur on-site. Based on field observations, existing habitat and vegetation, published information, and literature review, no special-status wildlife species (insects, amphibians, mammals, etc.) have potential to occur in the Study Area, as further described in the table within Appendix B of the BRA Special-status wildlife species identified in the database query occur in aquatic habitats, riparian habitats, old-growth forests, or in other habitats that do not occur in the Study Area.

The Study Area is in a partially developed area in an agricultural setting and is surrounded by rural residential properties. Although wildlife may disperse through the Study Area on a local level, the Study Area is not considered a wildlife migration or movement corridor.

Less than Significant with Mitigation Measure BIO-1 incorporated:

> BIO-1: To avoid impacts to nesting birds, all ground disturbing activity shall be completed between September 1 and January 31, if feasible. If construction activities occur during the nesting season (generally February 1 to August 31), a qualified biologist shall conduct a nesting bird survey to determine the presence of any active nests within the Study Area. Additionally, the surrounding 500 feet of the Study Area shall be surveyed for active raptor nests, where accessible. The nesting bird survey shall be conducted within 14 days prior to commencement of ground-disturbing or other development activities. If the nesting bird survey shows that there is no evidence of active nests, then a letter report shall be prepared to document the survey and be provided to the project proponent, and no additional measures are recommended. If development does not commence within 14 days of the nesting bird survey, or halts for more than 14 days, then an additional survey is required prior to starting or resuming work within the nesting season.
>
> - If active nests are found, then the qualified biologist shall establish a species-specific buffer to prohibit development activities near the nest to and minimize nest disturbance until the young have successfully fledged or the biologist determines that the nest is no longer active. Nest monitoring may also be warranted during certain phases of construction to ensure nesting birds are not adversely impacted. If active nests are found within any trees slated for removal, then an appropriate buffer shall be established around the tree and all trees within the buffer shall not be removed until a qualified biologist determines that the nest has successfully fledged and/or is no longer active.
>
> - A qualified biologist shall conduct environmental awareness training that is given to all onsite personnel prior to the initiation of work.

- If construction occurs outside of the nesting bird season (September 1 to January 31) a nesting bird survey and environmental training for nesting birds will not be required.

b) Sensitive habitats include those that are of special concern to resource agencies or those that are protected under CEQA; Section 1600 of the California Fish and Game Code, which includes riparian areas; and/or Sections 401 and 404 of the CWA, which include wetlands and other waters of the U.S. No wetlands or aquatic habitats were observed within the project site. Field surveys by qualified professionals confirmed that no wetlands, aquatic habitats, riparian vegetation were observed within the project site. As further discussed in question d), the project site is not considered a wildlife migration or movement corridor. Therefore, the proposed project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community, and the impact would be less than significant.

Less than Significant Impact

c) According to the Biological Resources Assessment (BA), there are no wetlands and vernal pools or other isolated wetlands in the Study Area. Therefore, project implementation would not directly impact any wetlands.

No Impact

d) While the project property may be used by wildlife for movement or migration on a local level, the proposed project would not have a significant impact on this movement, as the project would involve the expansion of an existing cannabis cultivation facility that was historically used as a walnut orchard. The communities within the site do not function as a wildlife migration corridor, however the proposed project has the potential for direct and indirect impacts to nesting raptors, nesting birds, and other migratory birds if these species were to nest on or adjacent to the project site.

Less than Significant impact with BIO-1 incorporated.

e) Article 27 of the County's Zoning Ordinance, Section 27.13, Conditions for Commercial Cannabis Cultivation, tree removal is listed under Prohibited Activities, whereas: "(the) removal of any commercial tree species as defined by the California Code of Regulations section 895.1, Commercial Species for the Coast Forest District and Northern Forest District, and the removal of any true oak species (Quercus species) or Tan Oak (Notholithocarpus species) for the purpose of developing a cannabis cultivation site should be avoided and minimized." Additionally, Policy OSC-1.13 of the County General Plan states the County shall support the conservation and management of oak woodland communities and their habitats. Resolution Number 95-211 was adopted as a Management Policy for Oak Woodlands in Lake County, whereas the County of Lake aims to monitor oak woodland resources, pursue education of the public, federal, State and local agencies on the importance of oak woodlands, promote incentive programs that foster the maintenance and improvement of oak woodlands, and, through federal, State, and local agency land management programs, foster oak woodlands on their respective lands within the County. The Oak Woodlands Protection Act and the County of Lake identify mitigation standards for projects that convert oak woodland to another use. Under

the Oak Woodlands Protection Act, Lake County shall require one or more oak woodland alternatives to mitigate the significant effect of the conversion of oak woodland.

An Oak Mitigation Plan was prepared by Jacobszoon and Associates, Inc. in December 2024 to identify alternatives to mitigate the significant effect of the conversion of oak woodlands. It is anticipated that a total of 362 black oaks would be required to be removed in order to construct the proposed cannabis support structures. As noted in the Oak Mitigation Plan by Seamus Fleming, registered forester, the table below represents the tree size and number of trees to be removed. The Mitigation Plan, drafted in 2024 states that the trees are in good health however a site visit in March of 2026 identified several diseased and downed trees on site (see Figure 4). The applicant is proposing to disturb 1.8 acres of land for the proposed structures and would plant across a potential of 178 acres of oak woodland on the property.

Table 2: Tree Summary by Species and Diameter

DBH	Black Oak	Ponderosa Pine
6	33	
8	129	
10	88	
12	62	
14	26	
16	12	2
18	6	1
20	3	
22	1	1
24	1	
26		
28		
30		1
32		
34	1	
36		
38		
40		1
Total	**362**	**6**

As outlined in the Oak Mitigation Plan, the project applicant would be required to mitigate the conversion of oak woodland to a new use, including replacing removed trees at a rate of 3:1 and maintaining these trees pursuant to Section 4526 of Senate Bill No. 1334, terminating seven years after the trees are planted. This would result in the planting of 1,086 saplings. Therefore, the impact would be less than significant with implementation of Mitigation Measure BIO-2.

BIO-2: To mitigate the removal of oak trees, oaks removed from the project site shall be replaced at a 3:1 ratio at a suitable location elsewhere on the property. Irrigation, maintenance, and protection of the planted oaks shall occur for seven years following the initial planting, as described in the Oak Tree Mitigation Plan prepared by Jacobszoon and Associates, dated December 18, 2024, and shall include the following measures:

- Protected saplings and oak plantings shall be established within and adjacent to existing oak woodland habitat immediately outside of the conversion area, primarily to the south and west of the project site.

    - Acorns shall be planted in basins containing three to five acorns per basin. Planting sites shall utilize existing microclimates to the extent feasible, focusing on interplanting throughout the existing oak woodland on the property and along roads and margins of woods. Acorn basins shall be spaced a minimum of approximately 15 feet apart to allow trees to reach full size at maturity, using the surrounding tree spacing as a model.

    - To minimize competing vegetation, a 3-foot diameter circle around each plant shall be cleared of all vegetation by hand weeding or hoeing. A thick layer of wood chip mulch shall be placed within the 3-foot circle to protect against weeds and help conserve moisture by reducing evaporation from the soil surface. Tree shelters shall be placed over the acorn basins to deter herbivory and encourage growth of saplings.

- Oak seedlings shall be irrigated for seven years following initial planting.

- Maintenance of the plantings is required for seven years. During this period, the area around each basin shall be hand weeded every four to six weeks. Weed growth within the 3-foot diameter circle of mulch shall be regularly removed.

- Annual monitoring shall be conducted in the spring and fall to document the survival of protected saplings and oak plantings. Annual monitoring reports shall include a summary of all relevant data regarding the health and status of the oak seedlings, discuss any necessary replacement planting, invasive plant management efforts or other remedial measures taken, summarize any changes or recommendations for adaptive management for the site, and document conditions with photographs of the site. Annual monitoring reports shall be submitted by a qualified forester or biologist to the Lake County Community Development Department.

Less Than Significant with Mitigation Measure BIO-2 incorporated.

f) The proposed project is not part of an adopted Habitat Conservation Plan, Native Community Conservation plan, or other approved local, regional, or State habitat conservation plan. Therefore, no impact would occur.

No Impact

V. CULTURAL RESOURCES	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

Discussion:

(a) A Cultural Resources Assessment was conducted for the project by ACME. On September 4, 2024, the Northwest Information Center (NWIC) of the California Historical Resources Information System (CHRIS) completed a cultural resources record search on behalf of ACME. The purpose of the record search was to obtain and review the reports for previous cultural resource studies and previously documented cultural resources within 0.25-mile of the project site, as well as any additional documentation pertaining to listed or eligible historical resources or unique archaeological resources located within 0.25-mile of the proposed cultivation areas.

An intensive-level pedestrian archaeological field survey of the project site was conducted by ACME on October 24, 2024. The surveyor examined the ground surface for evidence of cultural materials and evidence of historic-era artifacts (e.g., surface scatters of agricultural, mining, or domestic type artifacts of glass, ceramic, metal, etc.), features such as alignments of stone or brick, foundation elements from previous structures, minor earthworks, and historic-era plantings (e.g., old fruit, nut or other types of trees, and ornamental plants). A revision to the project's site plan was required and the pedestrian survey of the cultivation areas did not identify any potentially significant cultural resources, historic properties, historical resources, or unique archaeological resources within the project site.

Although the CRS concluded that the project site has a low potential/sensitivity for containing buried archaeological precontact resources, there remains inadvertent discovery potential for cultural resources to be encountered during excavation and construction activities. In the unlikely event that cultural resources are encountered during excavation and construction activities, implementation of Mitigation Measure CUL-2 would

require that all ground disturbing work within 100-feet of the find shall be halted and directed away from the discovery until a qualified archaeologist will ensure proper handling, interment, and adherence to Tribal rituals in accordance with Public Resources Code Section 5097.98 and Health and Safety Code Section 7050.5.

Less than significant impact with Mitigation Measures CUL-1 and CUL-2 incorporated.

CUL-1: If any archaeological, paleontological, or cultural materials are encountered during site development, all work within 100 feet of the find(s) shall be temporarily suspended. A qualified archaeologist certified by the Registry of Professional Archaeologists (RPA) shall be notified to assess the discovery and recommend appropriate mitigation measures, if needed. The findings and proposed mitigation strategies shall be subject to review and approval by the Lake County Community Development Director prior to resuming work.

CUL-2: Should any human remains be encountered, the applicant shall cease work within 100 feet and notify the Sheriff's Department. It should be noted that the Coroner must determine if the remains are modern or Native American. If they are Native American, the Coroner will notify the Native American Heritage Commission (NAHC) to determine the Most Likely Descendant (MLD). Once the MLD is determined, the culturally affiliated Tribe(s), and a qualified archaeologist will ensure proper handling, interment, and adherence to Tribal rituals in accordance with Public Resources Code Section 5097.98 and Health and Safety Code Section 7050.5.

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

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

No human remains are known to exist within the project area nor were there any indications of human remains found during the field survey. However, there is always the possibility that subsurface construction activities associated with the proposed project, such as trenching and grading, could potentially damage or destroy previously undiscovered human remains. This is a potentially significant impact. However, if human

remains are discovered, implementation of Mitigation Measure CUL-2 would reduce this potential significant impact to a less than significant level.

Less than Significant Impact with CUL-2 incorporated

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

Discussion:

(a) Electricity for the proposed project would continue to be provided by the existing PG&E connection to the current cannabis cultivation facility. Energy consumed for proposed project construction would primarily consist of transportation fuels in the form of diesel and gasoline. Fuel consumption would result from the use of on-road and off-highway trucks for the transportation of construction materials, construction worker vehicles traveling to and from the proposed project site, and the use of off-road construction equipment. While construction activities would consume petroleum-based fuels, consumption of such resources would be temporary and would cease upon the completion of construction.

Operation of the proposed project would involve the continued cultivation of flowering cannabis plants within the six outdoor mature cultivation areas and the new cultivation of immature plants within the proposed nursery building. The proposed project would increase the maximum number of employees from 15 to 20 workers on site at any given time. Gasoline and diesel fuels would be consumed by employee vehicles and delivery vans and trucks as part of project operations. However, this increase in employees would be minimal and would not result in a significant increase in vehicle trips related to current facility operations. Operation of the proposed project would not require new backup generators. The total annual water use on site would be 107.37 AFY under the proposed project; however, this is inclusive of the 58.86 AFY of water used under existing cultivation conditions. Water sourced from public utilities results in GHG emissions from the energy required to source, treat, and transport the water over long distances. The existing and proposed annual water supply would be sourced from the two existing wells on the project site, Well 1 and Well 2. One additional well may be constructed on a disturbed portion of the property to increase pumping efficiency, if necessary. Therefore, the change in water use and electricity used by the proposed project would be minimal in comparison to current facility operations.

Further, the project would be required to comply with State idling rules: commercial diesel vehicles- 13 CCR Chapter 10 Section 2485; off road diesel vehicles- 13 CCR Chapter 9 Article 4.8 Section 2449, resulting in reduced transportation fuels. The proposed project would comply with the Bay Area Air District Threshold A performance standards. Additionally, the changes in project operational emissions would be negligible compared to operational emissions from the existing facility. Therefore, the project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project operation and the impact would be less than significant.

Less than Significant Impact

(b) According to the California Department of Cannabis Control's Title 4 Division 19 §15010 on compliance with the CEQA, all cannabis applications must describe their project's anticipated operational energy needs, identify the source of energy supplied for the project and the anticipated amount of energy per day, and explain whether the project will require an increase in energy demand and the need for additional energy resources. To address this, the applicant has included their energy usage in the property management plan, stating that the proposed cultivation operation does have an existing PG&E electrical connection. The proposed project would not result in a substantial new demand for energy resources nor conflict with or obstruct any State or local plan for renewable energy or energy efficiency. Therefore, the impact would be less than significant.

Less than Significant Impact

VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant With Mitigation Measures	Less Than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potentially substantial adverse effects, including the risk of loss, injury, or death involving: i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special. Publication 42. ii) Strong seismic ground shaking? iii) Seismic-related ground failure, including liquefaction? iv) Landslides?	☐	☒	☐	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☒	☐	☐

c)	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-site or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d)	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e)	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☒	☐
f)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

Discussion:

a) The project site is located in a seismically active area of California and is expected to experience moderate to severe ground shaking during the lifetime of the project. That risk is not considered substantially different than that of other similar properties and projects in California. Installation of water tanks and pad preparation will require a grading permit and potential for geotechnical analysis at the time of building permit application.

Earthquake Faults (i)
According to the USGS Earthquake Faults map available on the Lake County GIS Portal, there is a linear earthquake fault two (2) miles southwest of the subject site. The linear faults run parallel to the Clear Lake shoreline. The last estimated rupture for these faults was less than 1,600,000 years ago. Because there are no known faults located on the project site, there is no potential for the project site to rupture during a seismic event. Thus, no rupture of a known earthquake fault is anticipated and the proposed project would not expose people or structures to an adverse effects related rupture of a known earthquake fault as no structures for human occupancy are being proposed.

Seismic Ground Shaking (ii) and Seismic–Related Ground Failure, including liquefaction (iii)
Lake County contains numerous known active faults. Future seismic events in the Northern California region can be expected to produce seismic ground shaking at the site. All proposed construction is required to be built under Current Seismic Safety Construction Standards, and no large structures are proposed on this project site.

Landslides (iv)
The project cultivation site is generally level without significant slopes. There are some risks of landslides on the parcel, however the proposed project's cultivation site is located on a flat area along the top of the ridgeline. According to the Landslide Hazard Identification Map prepared by the California Department of Conservation's Division of Mines and Geology, the area is considered generally stable. As such, the project's cultivation site is considered moderately susceptible to landslides and will not likely expose

people or structures to substantial adverse effects involving landslides, including losses, injuries or death.

GEO-1: a Grading Permit shall be obtained in accordance with Chapter 30, Granding Ordinance, of the Lake County Municipal Code. Grading and Erosion plans in accordance with the Grading Ordinance requirements shall be prepared and submitted prior to any earthwork, tree removal, or grading. The project design shall incorporate Best Management Practices (BMPs) to the maximum extent practicable to prevent or reduce the discharge of all construction or post-construction pollutants into the County storm drainage system. BMPs typically include scheduling of activities, erosion and sediment control, operation and maintenance procedures, and other measures in accordance with Chapters 29 and 30 of the Lake County Code.

Less Than Significant Impact with Mitigation Measure GEO-1 incorporated

b) Grading, discing, tilling, and tree removal is anticipated to be required for the proposed project. Any cut would be balanced on site; therefore, no export of cut off site would be required. The applicant is proposing to add interior access roads to the proposed nursery and processing facility, building pads for the proposed nursery and processing facility, and removal of 362 oak trees to be replaced by 1,086 trees to be replanted elsewhere on the property. The soil types in the areas proposed to be graded are Collayomi-Aiken-Whispering complex which is not a topsoil-rich agricultural soil.

The applicant proposes to develop approximately 1.8 acres of their property for the construction of a cannabis nursery building and processing facility. Preparing the proposed site for development will require the conversion of an established oak woodland.

The project site was evaluated and surveyed by Jacobszoon and Associates on September 11, 2024. The project area is occupied by a dense, primarily even-aged stand of California black oak with scattered overstory ponderosa pine. Understory vegetation on site is comprised of annual grasses, manzanita and oak and regeneration. Trees to be removed under the proposed project include oaks ranging in size from 6” to 34” diameter at breast height (DBH), with the average stem being approximately 10” DBH. The average height of oaks on site is approximately 40 feet. A census survey of the site produced a total of three hundred sixty-two (362) black oaks and six (6) ponderosa pines. It is anticipated that all 362 oaks will be removed during the conversion operation to prepare the site for development.

Due to the number of trees proposed for removal, a Complex Grading Permit is required, in accordance with Chapter 30, Grading Ordinance, of the Lake County Municipal Code. Additionally, as discussed within the Biological Resources Section of this Initial Study, BIO-2.

to comply with the California Oak Woodlands Conservation Act, oaks removed from the site will be replaced at a 3:1 ratio. Additionally, since the proposed project footprint is greater than 1-acre in size, the proposed cannabis cultivation project would be subject to National Pollutant Discharge Elimination System (NPDES) storm water regulations and would be required to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) during construction. Refer to the Hydrology and Water Quality Section of this Initial Study for more information

Less Than Significant Impacts with Mitigation Measures BIO-2 and GEO-1 through GEO-3, incorporated:

GEO-2: Excavation, filling, vegetation clearing, or other disturbance of the soil shall not occur between October 15 and April 15 unless authorized by the Community Development Department Director, in accordance with 'winter grading' procedures in Chapter 30, Grading Ordinance, of the Lake County Municipal Code. The actual dates of this defined grading period may be adjusted according to weather and soil conditions at the discretion of the Community Development Director.

GEO-3: The permit holder shall monitor the site during the rainy season (October 15 – May 15), including post-installation, application of BMPs, erosion control maintenance, and other improvements as needed.

c) The project site would be developed on Collayomi-Aiken-Whispering complex soils which are deep and well-drained, have moderate permeability, medium to high surface runoff, and moderate to high landslide risk depending on slope. Since the proposed project footprint is greater than 1-acre in size, the proposed cannabis cultivation project would be subject to NPDES storm water regulations and would be required to prepare and implement a SWPPP during construction, including implementation of sediment and erosion control BMPs. Liquefaction typically occurs in saturated, loose sandy or silty soils with a shallow water table. However, soils on the project site contain a mix of sand, silt, clay, and rock fragments, which results in soils with generally good drainage that are less prone to liquefaction compared to fine sandy or silty soils. Additionally, since the soils have low to moderate potential for expansibility, any proposed structures requiring a building permit would be subject to the UBC and CBC. Thus, project impacts related to unstable soils would be less than significant.

   Less Than Significant Impact

d) The Uniform Building Code is a set of rules that specify standards for structures. Soils on the project site primarily consist of gravelly loam and are not hydric in nature. Gravelly loam is generally not considered an expansive soil due to its composition consisting mainly of gravel and sand, which do not shrink or swell significantly with moisture changes. Additionally, any soil removed during grading or construction activities would be balanced on site, and construction would comply with any applicable BMPs and with a SWPPP as described in question b) above. The proposed project includes proposed buildings that would require building permits from Lake County Building Safety Division. Any proposed buildings would be designed and constructed by a qualified engineer and require County issuance of building permits following the building plan check review. Thus, since construction and implementation of the proposed cannabis cultivation project would not be located on expansive soil, there would be no impact.

   No Impact

e) The project site does not contain soil with a high risk of liquefaction, or soil with a high risk for erosion. The proposed project would construct an additional restroom in the proposed processing building, which would tie into the existing septic system; no new septic tank would be required. Therefore, impacts would be less than significant.

   Less than Significant Impact

f) No unique geologic features were identified in the Water Availability Analysis prepared for this project, and the Collayomi, Aiken, and Whispering soil types identified on the project site have low potential for containing paleontological resources (USDA 2022). Thus, it is unlikely that development and implementation of the proposed cannabis cultivation project would directly or indirectly destroy a unique paleontological resource or site with unique geologic features. However, the proposed project would be required to comply with applicable policies of the Lake County General Plan, including Policy OSC-8.13, *Discovery of Archaeological/Paleontological Resources*, in the *Open Space, Conservation, and Recreation Element* of the Lake County General Plan.

The requirements of this policy are stipulated in Mitigation Measure GEO-4, below, which would require the suspension of construction activities within 100 feet of a paleontological find in the event of an inadvertent discovery during project construction. With implementation of Mitigation Measure GEO-4, the potential impacts to unique paleontological resources would be reduced to less than significant.

GEO-4: In the event that paleontological resources are discovered during ground disturbing activities, the County shall require that grading and construction work within 100 feet of the find shall be suspended until the significance of the features can be determined by a qualified paleontologist. The County shall require that a qualified professional paleontologist make recommendations for measures necessary to protect the find; or to undertake data recovery, excavation, analysis, and curation of paleontological materials, as appropriate.

Less than Significant Impact with GEO-4 incorporated.

VIII. GREENHOUSE GAS EMISSIONS	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☒	☐	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Discussion:

a) The Construction GHG emission sources include construction equipment exhaust, on-road hauling trucks exhaust, vendor vehicle exhaust, and worker commuting vehicle exhaust. Construction GHG emissions were estimated by HELIX using CalEEMod version 2022.1. The Bay Area Air District has not adopted thresholds of significance for construction-period GHG emissions. The project's estimated total and amortized short-

term construction GHG emissions are shown below, Construction GHG Emissions.

CONSTRUCTION GHG EMISSIONS

Year	Emissions ($MT CO_2e$)
2026	310
2027	294
Total	***604***
Amortized Construction Emissions (30 years)	***20***

Source: CalEEMod

Operational Emissions

Operation of the proposed project would involve the continued cultivation of flowering cannabis plants within the six outdoor mature cultivation areas and the new cultivation of immature plants within the proposed nursery building. The proposed project would increase the maximum number of employees from 15 to 20 workers at any given time. However, this increase in employees would be minimal and would not result in a significant increase in vehicle trips related to current facility operations. Operation of the proposed project would not require new backup generators.

The total annual water use on site would be 107.37 AFY under the proposed project; however, this is inclusive of the 58.86 AFY of water used under existing cultivation conditions. Water sourced from public utilities results in GHG emissions from the energy required to source, treat, and transport the water over long distances. The existing and proposed annual water supply would be sourced from the two existing wells on the project site, Well 1 and Well 2. One additional well may be constructed on a disturbed portion of the property to increase pumping efficiency, if necessary. Therefore, the change in water use and electricity used by the proposed project would be minimal in comparison to current facility operations. Overall, the changes in project operational emissions would be negligible compared to operational emissions from the existing facility and project operational emissions were not quantified.

Bay Area Air District Performance Standard-Based Threshold A

Bay Area Air District has adopted performance standard-based thresholds rather than quantitative GHG emissions thresholds. LCAQMD has not adopted thresholds of significance for GHG emissions; therefore, the significance of the project's GHG emissions is determined using the Bay Area Air District performance standard-based Threshold.

A: A.1.a. No Natural Gas – The project will not include natural gas appliances or natural gas plumbing. The proposed project would not include natural gas appliances or natural gas plumbing. Therefore, the project would comply with A.1.a. No Natural Gas.

A.1.b. Wasteful, Inefficient, Or Unnecessary Energy Usage – The project will not result in wastewater, inefficient, or unnecessary energy usage.

The project would be required to comply with all applicable Couty and State green building measures, including the State Building Energy Efficiency Standards – Title 24, Part 6, and Part 11 (CEC 2022). Additionally, unnecessary consumption of energy resources during

construction would be avoided through restriction of vehicle idling times and proper maintenance of construction equipment, as required in Mitigation Measure AQ-7. Therefore, the project would comply with A.1.b. Wasteful, Inefficient, or Unnecessary Energy Usage, with implementation of Mitigation Measure AQ-7.

A.2.a. VMT Reduction – Achieve a reduction in project-generated VMT below the regional average.

According to the Governor's Office of Land Use and Climate Innovation (LCI), formerly the Office of Planning and Research, Technical Advisory on Evaluating Transportation Impacts in CEQA, small land use projects that would generate or attract fewer than 110 trips per day generally may be assumed to cause a less than significant impact related to VMT (LCI 2018). Construction of the proposed project would involve vehicle trips associated with construction equipment, materials, and workers to and from the project site. Additionally, construction would require heavy construction equipment that would be transported to and from the project site; however, it is expected that the majority of this equipment would remain on-site until construction is completed.

Operation of the proposed project would generate vehicle trips from employees and delivery/pickup vehicles entering and leaving the project site, similar to current operations. The proposed project would increase the maximum number of employees from 15 to 20 workers at any given time. However, this increase in employees would be minimal and would not result in a significant increase in vehicle trips related to facility operations.

As it is anticipated that the number of trips generated by the proposed project during construction and operation of the proposed project would be less than the 110 trips per day threshold established by OPR, the project would comply with A.2.a, VMT Reduction.

A.2.b. Electric Vehicle Parking – Achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2 standards.

No new parking areas or spaces are proposed under the project. Therefore, the project would comply with A.2.b, Electric Vehicle Parking.

The proposed project would comply with the Bay Area Air District Threshold A performance standards with implementation of Mitigation Measure AQ-7

Less than Significant with Mitigation Measure AQ-7 incorporated

b) There are numerous State plans, policies, and regulations adopted for the purpose of reducing GHG emissions. The principal overall State plan and policy is AB 32, the California Global Warming Solutions Act of 2006. The quantitative goal of AB 32 is to reduce GHG emissions to 1990 levels by 2020. SB 32 requires further reductions of 40 percent below 1990 levels by 2030. AB 1279 requires the State to achieve net zero GHG emissions no later than 2045. The mandates of AB 32, SB 32, and AB 1279 are implemented at the State level by the CARB's Scoping Plan. Because the proposed project's operational year is post-2020, the project aims to reach the quantitative goals set by SB 32 and AB 1279. Statewide plans and regulations such as GHG emissions

standards for vehicles and transportation fuels, and regulations requiring an increasing fraction of electricity to be generated from renewable sources are being implemented at the Statewide level; as such, compliance at the project level is not addressed. Therefore, the proposed project would not conflict with those plans and regulations.

Lake County has not adopted any specific GHG reduction strategies or climate action plans. As noted in question a) above, the proposed project would comply with the Bay Area Air District Threshold A performance standards, and therefore would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. As a result, the proposed project would not conflict with the GHG reduction objectives of the State's Scoping Plan, including net zero GHG emissions by 2045, mandated by AB 1279. The impact would be less than significant.

Less than Significant Impact

IX. HAZARDS AND HAZARDOUS MATERIALS	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☒	☐	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒

f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

a) The proposed project would expand the existing cannabis cultivation facility from 20 acres of outdoor cannabis cultivation canopy to 30.11 acres of canopy. The project would also construct a new processing building, nursery building, water storage tanks, non-cannabis accessory buildings, and associated utilities and infrastructure. Cannabis cultivation operations, including immature plant operations, may involve the use of petroleum products, pesticides, fertilizers, and other agricultural chemicals that may be considered hazardous. Under the Cal Cannabis Licensing Program by CDFA, cultivators would be required to store, use, and dispose of hazardous materials in accordance with a broad range of applicable laws and regulations. Additionally, the proposed project would be required to comply with Section 41.7 of the Lake County Zoning Ordinance, which specifies that all uses involving the use or storage of combustible, explosive, caustic, or otherwise hazardous materials shall comply with all applicable local, State, and federal safety standards and shall be provided with adequate safety devices against the hazard of fire and explosion, and adequate firefighting and fire suppression equipment.

All use of pesticide products shall comply with State pesticide laws and regulations, enforced by the County Department of Agricultural and Weights and Measure, the County Department of Environmental Health, and the California Department of Pesticide Regulation (CDPR). For pesticides exempt from registration requirements, licensees shall comply with all pesticide laws and regulations enforced by the CDPR and with additional pesticide application and storage protocols. These protocols include containing any chemical leaks and immediately cleaning up any spills, preventing off-site drift, and not applying pesticides when they may reach surface water or groundwater, among others. Activities during project construction and operation that would transport, use, or store hazardous materials would be required to do so in compliance with applicable local, State, and federal hazardous material regulations. Compliance with these regulations, along with the requirements of CDFA, would reduce impacts regarding the transport, use, and storage of hazardous materials to a level that would be less than significant with mitigation measures incorporated.

Less Than Significant Impact with Mitigation Measures HAZ-1 through HAZ-2 incorporated:

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

HAZ-2: With the storage of hazardous materials equal to or greater than fifty-five (55) gallons of a liquid, 500 pounds of a solid, or 200 cubic feet of compressed gas, a Hazardous Materials Inventory Disclosure Statement and Business Plan shall be submitted and maintained in compliance with requirements of Lake County Environmental

Health Division. Industrial waste shall not be disposed of on site without review or permit from Lake County Environmental Health Division or the California Regional Water Quality Control Board. The permit holder shall comply with petroleum fuel storage tank regulations if fuel is to be stored on site.

b) The storage and use of hazardous materials during cannabis cultivation activities would involve potential for on-site releases of these materials. Employees and other persons could be exposed to hazardous material releases through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. The main concern would be employee exposure; the size of the project site would make it unlikely that any releases of hazardous materials would extend beyond site boundaries.

As discussed in question a) above, project site activities that would transport, use, or store hazardous materials would be required to comply with applicable local, State, and federal regulations. These regulations are designed to ensure that these materials are properly stored and transported, thereby reducing the likelihood of accidental release. In the event of an accidental release of hazardous materials during operations or routine maintenance, steps would immediately be taken in accordance with applicable local, State, and federal regulations to contain the release and clean up any exposed areas. Compliance with these regulations, along with the requirements of the County Code discussed in the response to question a) above, would reduce project impacts related to potential release of hazardous materials to a level that would be less than significant with mitigation measures incorporated.

Less than Significant Impact with Mitigation Measures HAZ-1 through HAZ-3 incorporated:

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

c) The nearest schools to the project site are Riviera Elementary School, located approximately 3.75 miles north of the project site, and Cobb Mountain Elementary School, located approximately 4.5 miles south of the project site. Therefore, the project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, and no impact would occur.

No Impact

d) As noted above, neither the GeoTracker nor the EnviroStor databases have any records of active hazardous material sites on or in the vicinity of the project site. Therefore, the proposed project would not 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 not create a significant hazard to the public or the environment. No impact would occur.

No Impact

e) There are no public or public-use airports within two miles of the project site, and the project site is not located within an airport land use plan. The nearest public airport is the Lampson Field general aviation airport, located over 11 miles northwest of the project site. Given this distance, the project would not expose employees to potential safety hazards from airport operations, and no impact would occur.

No Impact

f) The Lake County Emergency Operations Plan (EOP) establishes multi-agency and multijurisdictional coordination during emergency operations within the County. The EOP serves as a planning reference and provides the legal framework for emergency management in the County. The EOP is updated approximately every two years by the County OES and is currently undergoing the 2025 update process (County 2025a). Construction of the proposed project would occur within the boundary of the project site and would not result in lane closures or otherwise impede traffic along Seigler Springs North Road or other roadways in the project vicinity. During project operation, it is anticipated that up to 20 workers would be present on site. Given the low volume of traffic and population in the area, evacuation of the project site during emergencies is not anticipated to substantially increase traffic or otherwise impact the ability for surrounding areas to evacuate. During project operation, adequate access for emergency vehicles via Seigler Springs North Road and connecting roadways would remain available. The project would not result in a substantial alteration to the design or capacity of any public road that would impair or interfere with the implementation of evacuation procedures. The proposed project would adhere to all federal, State, and local fire requirements and would not conflict with the County EOP. Therefore, the impact would be less than significant.

Less than Significant Impact

g) The project is in a rural area of the County and is primarily surrounded by rural, forested, and undeveloped land. As discussed in Section 6.XX, Wildfire, the project site is mapped by the CAL FIRE as being located within a Very High Fire Hazard Zone within a State Responsibility Area (SRA) (CAL FIRE 2025). The Kelseyville Fire Protection District (KFPD) is primarily responsible for structural fire protection services to the project site and the CAL FIRE Kelsey Cobb Station is primarily responsible for wildland fire suppression. The degree of hazard in wildland areas depends on variables like temperature, wind, and moisture, the amount of dryness and arrangement of vegetation, slope steepness, proximity to human activities, accessibility of firefighting equipment, and fuel clearance around structures.

Construction of the proposed project components would require activities that could result in sparks, such as welding or grinding, which have a greater likelihood of creating a source of ignition than other construction-related activities. Operation of the proposed project is not anticipated to involve activities that would increase the risk of wildland fires. Although the proposed project would be located within an area of Lake County mapped as a Very High Fire Hazard Zone, the project applicant would be required to adhere to all federal, State, and local fire requirements/regulations for setbacks and defensible space, including requirements adherence to the California Building Code (CBC) Chapter 7A, *Fire Hazard Severity Zones and Building Standards and Materials*, and Public Resource Code 4291,

which requires property owners to maintain clearance of flammable vegetation of 100 feet from structures in order to reduce the risk of fire. Therefore, adherence to all federal, State, and local requirements would reduce the impact to a less than significant level.

Less than Significant Impact

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

Discussion:

a) The project site is not located on or near any streams or any surface waters. The nearest water source to the proposed project is Clear Lake, located approximately 4.3 miles north of the project site. Construction of the proposed project could potentially violate water quality standards or waste discharge requirements, as construction equipment and materials have the potential to result in accidental discharge of pollutants into water resources. Operation of the proposed project could potentially introduce contaminants into water resources from stormwater runoff, as pesticides used on the cultivation areas could potentially mix into stormwater runoff. However, since the proposed expansion would be greater than 1-acre, the proposed project

would be required to comply with the NPDES and would be required to create and implement a SWPPP that would help reduce potential construction and operational impacts. The project proponent would also be required to be enrolled under the SWRCB Cannabis General Order WQ 2019-0001-DWQ. One of the requirements is to prepare a Site Management Plan, which includes identifying potential sources of water quality violations or waste discharge requirements, corrective actions including implementing and monitoring BMPs, and documenting water usage and timing to ensure the water use is not impacting water quality objectives and beneficial uses. Coverage under the General Order would require the applicant to prepare a Site Management Plan and Nitrogen Management Plan and provide these documents to the North Coast Regional Water Quality Control Board (RWQCB). The Site Management Plan would be prepared by a storm water professional with a QSP, QSD, and QISP State certifications, and would provide details for waste discharge requirements and post-construction BMPs. The Site Management Plan would also provide compliance with the requirements of Chapter 29 of the Lake County Code, Storm Water Management Ordinance. Thus, any potential violations to water quality standards or waste discharge requirements, including actions that could substantially degrade surface or ground water quality, would be reduced through coverage under the SWRCB General Order which includes a Site Management Plan, Nitrogen Management Plan, and Monitoring and Reporting Program, and there would be a less than significant impact.

Less than Significant Impact

b) Due to the existing exceptional drought conditions, on July 27, 2021, the Lake County Board of Supervisors passed an Urgency Ordinance (Ordinance 3106) requiring land use applicants to provide enhanced water analysis during a declared drought emergency. Ordinance 3106 requires that all project that require a CEQA analysis of water use include the following items in a Hydrology Report prepared by a licensed professional experienced in water resources:

- Approximate amount of water available for the project's identified water source,
- Approximate recharge rate for the project's identified water source, and
- Cumulative impact of water use to surrounding areas due to the project

While the drought conditions have significantly changed in Lake County, and there is no longer a declared drought emergency, the Community Development Department will continue to require Hydrological Assessments (Hydrology Reports) for all land use permits in accordance to the Lake County Zoning Ordinance. The cannabis cultivation facility currently receives water supplies from the two existing irrigation wells on the project site that are dedicated for cannabis cultivation. Under the proposed project, water from the two existing wells on the project site, Well 1 and Well 2, would be used to irrigate the existing and proposed outdoor cannabis cultivation Areas A and B, the proposed canopy on Areas C through F, and the proposed cultivation within the new nursery building. Additionally, water from the wells would be pumped and stored in the existing 300,000-gallon water storage tanks and the two proposed 600,000-gallon water storage tanks. The applicant is proposing one additional well may be constructed on a disturbed portion of the property to increase pumping efficiency, if necessary.

A Water Availability Analysis (WAA) was prepared by EBA Engineering in January 2025 and included the proposed project site within its study area. The project proposes to use groundwater from two existing, permitted on-site wells. The proposed project site use involves groundwater pumping throughout the entire calendar year. Groundwater use steps up throughout the year to provide water supply for the nursery building, the light deprivation cultivation area, and the outdoor cultivation area. Once the outdoor growing season begins, the initial weekly water demands are lower in the first three weeks since approximately 20 acres of outdoor cultivation area is proposed during this time due to overlap with the light deprivation cultivation area of 10 acres. The Oak Tree Mitigation Plan includes watering 1,086 replaced trees approximately 15 gallons of water per week for years one and two with watering frequency reduced to twice monthly for years three and four. Year's five, six, and seven will include watering monthly. Based on the total values provided by the project applicant, the total proposed annual water use was estimated to be approximately 35 million gallons per year, or 107.37 AFY (EBA Engineering 2025).

The total volume of groundwater in storage within the area of the aquifer immediately beneath the project site was estimated to be approximately 6,593 AF. The annual total water demand for the project was estimated to be approximately 1.6 percent of the groundwater in storage underlying the project site. Based on the available data and the distance drawdown evaluation, including the associated assumptions for both the drawdown model and well characteristics implied from a pumping test, the WAA determined that the pumping regimen proposed for the cannabis cultivation project appears to be unlikely to result in appreciable drawdown in off-site water supply wells. The project would have a less than significant impact on water quality.

Less Than Significant Impact with Mitigation Measures HYD-1 incorporated:

HYD-1: The production well shall be equipped with a meter to measure the amount of water pumped. The production wells shall have continuous water level monitors. A monitoring well of equal depth within the cone of influence of the production well may be substituted for the water level monitoring of the production well. The permittee shall maintain a record of all data collected and shall provide a report of the data collected to the County annually and/or upon made upon request.

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

The cultivation operation is enrolled in the State Water Resources Control Board's Order *WQ 2019-0001-DWQ General Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities* (General Order). Compliance with this Order will ensure that cultivation operations will not significantly impact water resources by using a combination of Best Management Practices, buffer zones, sediment and

erosion controls, inspections and reporting, and regulatory oversight. A sediment and erosion control plan is also being implemented as part of the larger Site Management Plan.

No surface water resources occur on the project site. Grading, the addition of impervious surfaces, and earth-moving activities associated with construction of the proposed project have the potential to result in erosion, siltation, temporary changes to drainage patterns, and contamination of stormwater. However, the project site would be covered by the SWRCB General Order which requires preparation of a Site Management Plan, Nitrogen Management Plan, and Monitoring and Reporting Program. These plans would include implementation of BMPs during construction to reduce the potential for impacts associated with erosion and exceeding water quality thresholds. Implementation of BMPs such as fiber rolls, hay bales, and silt fencing, and post-construction performance standards would reduce the potential for sediment and stormwater runoff containing pollutants from entering receiving waters. Furthermore, the proposed project involves installation of infiltration swales within the 100-foot setback along Seigler Springs Road which would absorb and filter any potential water runoff. Impacts related to alterations in drainage patterns and impervious surfaces due to construction of the proposed project would be less than significant.

At full buildout, the proposed project would include a 39,900-sf processing building on a 40,000-sf site, a 40,000-sf nursery building, and two 600,000-gallon water storage tanks adjacent to the existing 300,000-sf water storage tank. The project would also construct two 3,200-sf non-cannabis accessory buildings with power access and a 1,925-sf non-cannabis accessory building on the existing 2,000-sf concrete pad. This would represent a relatively low number of impervious surfaces: 86,300 sf of the approximately 57-acre property, or 3.48 percent. Thus, operation of the proposed project is not expected to increase the rate of surface runoff. Furthermore, as described in Section 6.VII, Geology and Soils, the project site is located on generally well-drained soil, and any runoff is expected to absorb into the cultivation area or be intercepted by proposed swales.

Flooding on- or offsite would not substantially increase due to the proposed project, as surface runoff would mainly recharge into the soils and be managed through site design. Grading associated with the proposed project would require a grading permit as to not significantly alter drainage patterns or result in changes in elevation, not impede or redirect flood flows, and would comply with any applicable Lake County grading permit requirements as required by law. Therefore, the project would have a less than significant impact to drainage patterns and runoff

Less than Significant Impact

d) The project site is not within a Special Flood Hazard Area. It is also not within an SB 5 200-year flood hazard area. The project site is neither near a large body of water nor on the coast, so it would not be subject to any seiche or tsunami hazards. The Allen Dam is a privately owned dam located approximately 8.15 miles northwest of the project site, and the proposed project is not located within its inundation zone (DWR 2025b). In summary, the project site is unlikely to be inundated and therefore it is unlikely to lead to the release of any pollutants due to flooding. The impact would be less than significant.

Less than Significant Impact

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

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

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

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

In addition to water use metering, water level monitoring is also required by Lake County Zoning Ordinance Article 27 Section 27.11 (at) 3, specifically that wells must have a meter to measure the amount of water pumped as well as a water level monitor. Well water level monitoring and reporting will be performed as follows:

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

<u>Water Level Monitoring During Extraction</u>
The purpose of monitoring the water level in a well during extraction is to evaluate the performance of the well and determine the effect of the pumping rate on the water source

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

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

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

Drought Emergency Water Conservation Measures

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

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

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

- Reduce the amount of cultivation and/or length of cultivation season
- Install additional water storage

- If possible, develop an alternative, legal, water source that meets the requirements of Lake County Codes and Ordinances.

Less Than Significant Impact with Mitigation Measure HYD-2 incorporated:

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

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

Discussion:

a) The project site is located within a predominantly rural area surrounded by densely wooded land in the southwestern region of Lake County. There are scattered residences in the immediate project vicinity, including single-family residences to the east and west. A total of three single-family residences are located on the applicant-owned property, located on APNs 011-069-48, 115-004-07, and 115-004-08; however, these single-family residences are located outside of the project footprint. Seigler Springs North Road traverses the project site from northwest to southeast and partially bisects APNs 115-004-01 and 115-004-05. The proposed project would expand upon an existing cannabis facility and would not construct any new roadways or linear features that would divide an established community. Therefore, no impact would occur.

No Impact

b) The project site is located within the Cobb Mountain Area Plan and consists of parcels that are designated Agriculture (A), Rural Lands (RL), or a combination of the two in the General Plan and are zoned Agriculture (A), Rural Lands 5-Acre Minimum (RL-B5), or a combination of both. While commercial cannabis cultivation is not currently written into the existing General Plan, there are several policies for agricultural activities, land use, and economic development. According to Article 27 of the Lake County Zoning Ordinance, cannabis cultivation is allowed on lands zoned Agriculture (A) and Rural Lands 5-Acre Minimum (RL-B5) with a Major Use Permit. While the project proposes tree removal, an

activity generally prohibited under Article 27 of the Lake County Zoning Ordinance, this potential conflict does not result in a significant environmental impact. The project incorporates Mitigation Measure BIO-2, which ensures that the loss of oak trees is compensated through replacement and maintenance of the trees, thereby satisfying the underlying environmental objective of the Ordinance and reducing the impact to a Less than significant level.

Less than Significant Impact

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

Discussion:

a) The Lake County Aggregate Resource Management Plan does not identify the area designated for cultivation within the project parcel as a significant source of aggregate resources. According to the California Department of Conservation's Mineral Land Classification, there are no known mineral resources present on the project site. Additionally, no Mineral Resource Zones have been designated on or near the project site, resulting in no anticipated impact.

No Impact

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

No Impact

XIII. NOISE	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Discussion:

a) The proposed project would construct various support structures including a 39,900-sf processing building on a 40,000-sf site, a 40,000-sf nursery building, and two 600,000-gallon water storage tanks adjacent to the existing 300,000-sf water storage tank. The project would also construct two 3,200-sf non-cannabis accessory buildings with power access and a 1,925-sf non-cannabis accessory building on the existing 2,000-sf concrete pad. Construction is anticipated to begin in Spring of 2026 and would last approximately 18 months. Construction activities would be limited to Monday through Friday, between the hours of 7:00 A.M. and 7:00 P.M. As stated above, per Section 21-41.11(e) of the Lake County Zoning Ordinance, noise sources emanating from construction site sounds that occur between 7:00 A.M. and 7:00 P.M. are exempt from the provisions of the section. However, as several residences are located within 500 feet to the east and west of the project site, noise-reducing mitigation measures would be required to be implemented during project construction per the Noise Element of the County General Plan. Implementation of Mitigation Measure NOI-1 and NOI-2 would reduce construction-related noise levels to less than significant.

   The proposed project would increase the maximum number of employees on site from 15 to 20 workers. Operation of the proposed project would occur within the current hours of business of the cannabis cultivation facility. Operation of the proposed project would involve similar activities including cultivation, processing, packaging, and transporting to an off-site facility. Therefore, operation of the proposed project would not substantially increase noise beyond the existing levels.

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

NOI-1: All construction activities including engine warm-up shall be limited Monday Through Friday, between the hours of 7:00 a.m. and 7:00 p.m., and Saturdays from 12:00 noon to 5:00 p.m. to minimize noise impacts on nearby residents. Back-up beepers shall be adjusted to the lowest allowable levels.

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

b) The proposed project would not include components that would result in excessive ground borne vibration. While equipment in use during construction may result in minimal amounts of ground borne vibration, these effects would be temporary and not excessive. Therefore, a less than significant impact would occur.

Less Than Significant Impact

c) There are no public or public-use airports within two miles of the project site, and the project site is not located within an airport land use plan. The nearest public airport is the Lampson Field general aviation airport, located over 11 miles northwest of the project site. Given this distance, the project would not expose employees to excessive noise levels from airport operations, and no impact would occur.

No Impact

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

Discussion:

a) The proposed project would include the expansion of an existing cannabis cultivation facility and the construction of two 3,200-sf non-cannabis accessory buildings, a 1,925-sf non-cannabis accessory building, a 40,000-sf nursery building, a 39,900-sf processing building, and two 600,000-gallon water storage tanks. As noted in Section 6.XI, Land Use and Planning, the proposed project would be consistent with the existing County General Plan designation and zoning. The project does not propose the construction of any residences; therefore, the project would have no direct impact on population growth. As described in Chapter 3.0, Project Description, it is anticipated that the project would increase employees on-site from 15 to up to 20 workers on the project site at any given time, a delta of five additional employees. While the proposed expansion of the existing cannabis cultivation site is expected to generate employment of up to five additional employees, it is anticipated that most employees would be sourced from existing residents in Lake County. The project would not create new roads off-site, water or wastewater lines, or other infrastructure such that substantial population growth would indirectly occur. Therefore, the project would not result in substantial population growth nor encourage population growth not otherwise planned for in the County General Plan, and the impact would be less than significant.

Less than Significant Impact

b) As noted in the response to question a) above, the project would not result in the removal of any existing homes. Therefore, the project would not displace housing or people, and there would be no impact.

No Impact

XV. PUBLIC SERVICES

	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: 1) Fire Protection? 2) Police Protection? 3) Schools? 4) Parks? 5) Other Public Facilities?	☐	☐	☒	☐

Discussion:

1) Fire Protection

The proposed project would expand the existing 30-acre outdoor cannabis cultivation area on site by 15.16 acres, for a total of 45.16 acres of cultivation area. The proposed project would also construct a 40,000-sf nursery building, a 39,900-sf processing building, and two 600,000-gallon water storage tanks. Development of the proposed project could increase the demand on existing County fire protection resources; however, the potential fire risk associated with cannabis cultivation and processing would not be substantially different from that posed by other agricultural operations that use similar equipment and practices in the area. This minimal increase in fire protection demand would be adequately served by the existing fire personnel and stations in the County. Further, the project would be subject to the provisions of the adopted California Fire Code. Required fire protection systems would be regulated by California Fire Code Chapter 9 and applicable chapters of the CBC and California Electrical Code. Additionally, fire apparatus access roads must be provided pursuant to California Fire Code Section 503, portable fire extinguishers must be provided as required by California Fire Code Section 906, and the proposed Knox Box shall be installed according to the KFPD's instructions as required by California Fire Code Section 506, among other requirements. Therefore, the impact on fire protection would be less than significant.

2) Police Protection

Expansion of the existing cannabis cultivation facility has the potential to increase calls for law enforcement services from the project site due to increased personnel on site during construction and project operation. As discussed in Section 3.3, Project Components, the proposed facility expansion would include site security including fencing, electric gates, Knox Box, alarm system, cameras, and motion sensor lights, which would reduce potential incidents requiring law enforcement services. Further, Article 27 of the Lake County Zoning Ordinance lays out specific guidelines for security measures for commercial cannabis cultivation to prevent access of the site by unauthorized personnel and protect the physical safety of employees. This includes 1) establishing a physical barrier to secure the perimeter access and all points of entry; 2) installing a security alarm system to notify and record incident(s) where physical barriers have been breached; 3) establishing an identification and sign-in/sign-out procedure for authorized personnel, suppliers, and/or visitors; 4) maintaining the premises such that visibility and security monitoring of the premises is possible; and 5) establishing procedures for the investigation of suspicious activities. However, any increase in calls for law enforcement services are anticipated to be infrequent and minor in nature. Adherence to the provisions of the relevant sections of the Lake County Code would further reduce the need for increased police protection during project operation. Therefore, implementation of the proposed project would result in a less than significant impact on police protection.

3) Schools

As discussed in Section 6.XIV, Population and Housing, the project is not expected to induce substantial population growth, which is a main factor in demand for school facilities. Therefore, the proposed expansion of the existing cannabis facility is not expected to generate additional demand for school services, parks, or other public facilities within Lake County, and no impact would occur.

4) Parks

As discussed in Section 6.XIV, Population and Housing, the project is not expected to induce substantial population growth, which is a main factor in demand for parks. Therefore, the proposed expansion of the existing cannabis facility is not expected to generate additional demand for school services, parks, or other public facilities within Lake County, and no impact would occur.

5) Other Public Facilities
As discussed in Section 6.XIV, Population and Housing, the project is not expected to induce substantial population growth, which is a main factor in demand for other public facilities. Therefore, the proposed expansion of the existing cannabis facility is not expected to generate additional demand for school services, parks, or other public facilities within Lake County, and no impact would occur.

Less than Significant Impact

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

Discussion:

a) As discussed in Section 6.XIV, Population and Housing, the proposed expansion of the existing cannabis cultivation facility is not expected to induce substantial population growth, which is a main factor in demand for recreational facilities. Therefore, the proposed project would not generate additional demand for recreational facilities or parks, and no impact would occur

No Impact

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

No Impact

XVII. TRANSPORTATION	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b) For a land use project, would the project conflict with or be inconsistent with CEQA guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to geometric design features (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d) Result in inadequate emergency access?	☐	☐	☐	☒

Discussion:

a) The proposed project would include the expansion of an existing cannabis cultivation facility and the construction of associated support structures. Primary access to the proposed project is available from Seigler Springs North Road, which traverses the center of project site from northwest to southeast. Diener Drive provides access to the proposed southern cultivation areas. Both roadways are unstriped and unpaved/gravel in the vicinity of the proposed project. The proposed project is not located in the immediate vicinity of existing public transit, bikeways, or pedestrian facilities. The applicant is required to adhere to Public Resource Code 4290 Road Standards for emergency vehicle access. The interior roadways will be upgraded to meet width and surface requirements, which will be addressed within the complex grading permit required for this project. Therefore, the proposed project would not conflict with any existing program plan, ordinance, or policy addressing bicycle and/or pedestrian facilities. The impact would be less than significant.

Less than Significant Impact

b) According to the Governor's LCI, formerly the Office of Planning and Research, Technical Advisory on Evaluating Transportation Impacts in CEQA, small land use projects that would generate or attract fewer than 110 trips per day generally may be assumed to cause a less than significant impact related to VMT (LCI 2018). Construction of the proposed project would involve vehicle trips associated with construction equipment, materials, and workers to and from the project site. Only minor grading is anticipated, as the majority of the project site has been previously graded. Any cut would be balanced on site; therefore, no export of cut off site would be required. Proposed project construction would require heavy construction equipment that would be transported to the project site, and it is expected that the majority of this equipment would remain on-site until construction is completed. Operation of the proposed project would generate vehicle trips from employees and delivery/pickup vehicles entering and leaving the project site, similar to current operations. However, the project proposes to increase the number of employees

on site from 15 to 20 employees, which would generate an increase in vehicle trips in comparison to existing conditions. However, this increase would be minimal and would not attract a significant increase in vehicle trips related to facility operations. It is estimated that therefore, because the trips generated by the proposed project during construction and operation of the proposed project would be less than the 110 trips per day threshold established by OPR, the impact related to VMT would be less than significant.

Less than Significant Impact

c) The project site is transected by Seigler Springs North Road, which is an unpaved/gravel and unstriped roadway. Primary access to the project site is provided via four driveways off of Seigler Springs Road. However, no design features associated with the proposed project would increase hazards along Seigler Springs North Road or other roadways in the project vicinity. No changes would be made to existing public roads, and sufficient line of sight would be maintained to safely accommodate vehicles travelling to and from the project site. Therefore, the project would not substantially increase hazards due to a geometric design feature or incompatible use, and the impact would be less than significant.

Less than Significant Impact

d) The Lake County Emergency Operations Plan (EOP) establishes multi-agency and multijurisdictional coordination during emergency operations within the County. The EOP serves as a planning reference and provides the legal framework for emergency management in the County. The EOP is updated approximately every two years by the County OES and is currently undergoing the 2025 update process (County 2025a). As discussed in Section 6.IX, Hazards and Hazardous Materials, construction of the proposed project would occur within the boundary of the project site and would not result in lane closures or otherwise impede traffic along Seigler Springs North Road or other roadways in the project vicinity. During project operation, it is anticipated that up to 20 workers would be present on site. Given the low volume of traffic and population in the area, evacuation of the project site during emergencies is not anticipated to substantially increase traffic or otherwise impact the ability for surrounding areas to evacuate. During project operation, adequate access for emergency vehicles via Seigler Springs North Road and connecting roadways would remain available. The project would not result in a substantial alteration to the design or capacity of any public road that would impair or interfere with the implementation of evacuation procedures. The proposed project would adhere to all federal, State, and local requirements regarding emergency access and would not conflict with the County EOP. Therefore, the impact would be less than significant.

Less than Significant Impact

XVIII. TRIBAL CULTURAL RESOURCES	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
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)?	☐	☒	☐	☐
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1, the lead agency shall consider the significance of the +resource to a California Native American tribe?	☐	☒	☐	☐

Discussion:

(a) On September 4, 2024, the NWIC of the CHRIS completed a cultural resources record search on behalf of ACME. The purpose of the record search was to obtain and review the reports for previous cultural resource studies and previously documented cultural resources within 0.25-mile of the project site, as well as any additional documentation pertaining to listed or eligible historical resources or unique archaeological resources located within 0.25-mile of the proposed cultivation areas.

A Sacred Lands Files (SLF) inventory request was sent to the NAHC on August 29, 2024, to inquire about listed Sacred Sites located within or near the project site and to obtain a list of local Native American tribes who may have additional information about Sacred Sites, Traditional Cultural Resources, or other properties of traditional religious and cultural importance located within or near to the project site.

An intensive-level pedestrian archaeological field survey of the project site was conducted by ACME on October 24, 2024. The surveyor examined the ground surface for evidence of cultural materials and changes in soil color, texture, or composition. This included examining the ground surface for any precontact artifacts (e.g., chipped stone such as obsidian, chert and basalt flakes and tools; projectile points, knives, scrapers; shellfish remains; ground stone; and fire-affected rock); and sediment discolorations that could indicate the presence of precontact-era cultural features (e.g., midden, hearths, cairns and other indicators of prehistoric archaeological resources). Additionally, the field surveyor also inspected the Project Area for evidence of historic-era artifacts (e.g., surface scatters of agricultural, mining, or domestic type artifacts of glass, ceramic, metal, etc.), features

such as alignments of stone or brick, foundation elements from previous structures, minor earthworks, and historic-era plantings (e.g., old fruit, nut or other types of trees, and ornamental plants). A revision to the project's site plans was required and the pedestrian survey of the cultivation areas did not identify any potentially significant cultural resources, historic properties, historical resources, or unique archaeological resources within the project site.

Less than Significant Impact with mitigation measure CUL-1 through CUL-2 incorporated

b) Notification to Tribes in accordance with AB 52 was sent to twelve Tribes/Tribal entities with aboriginal territory in and around Lake County on October 20, 2025. Middletown Rancheria responded to the notification and requested Tribal Consultation. The applicant met with Tribe resulting in a Tribal Monitoring Agreement. Tribal Consultation was formally closed on March 17, 2026.

Although the CRS concluded that the project site has a low potential/sensitivity for containing buried archaeological precontact resources, there remains inadvertent discovery potential for cultural resources to be encountered during excavation and construction activities.. The lead agency has determined that, in its discretion and supported by substantial evidence, no resources pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1 will be affected by the proposed project.

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

TCR-1: All on-site personnel involved in the project shall receive Tribal Cultural Resource Sensitivity Training prior to beginning ground disturbance activities. The training must adhere to the standards established by the NAHC or the culturally affiliated Tribe. It shall cover the potential for uncovering subsurface resources, as well as procedures to follow if a potential resource is identified. The training shall include a process for notifying the culturally affiliated Tribe of any discoveries, as well as protocols for the protection, treatment, and handling of tribal cultural resources that are discovered or impacted during the project's ground disturbance activities.

TCR-2: The permitee shall notify the Culturally Affiliated Tribe at least 45 days prior to commencement of any and all ground disturbance activities on the project site and shall have a tribal monitor present during site disturbance .

TCR-3: All ground-disturbing activities shall cease within 100 feet of any Cultural Resource Discovery. All culturally affiliated tribes shall be notified of the discovery of cultural resources and granted access to the site to facilitate identification and further assessment to determine the significance of the cultural resource and appropriate preservation or disposition action(s).

TCR-4: If previously unidentified Tribal Cultural Resources are encountered during the project, materials and their stratigraphic context shall be avoided, and work shall be halted immediately. Project personnel shall not collect, move, or disturb cultural resources. A representative from the locally affiliated Tribe shall be contacted to assess the resource and develop a Tribal Cultural Resources plan for identification and further evaluation to determine the significance and appropriate treatment or disposition of the resource.

Less than Significant Impact with Mitigation Measures CUL-1 through CUL-2 and TCR-1 through TCR-4 incorporated

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

Discussion:

a) The project proposed to construct a 40,000-sf nursery building, a 39,900-sf processing building, and two 600,000-gallon water storage tanks. The project would also construct two 3,200-sf non-cannabis accessory buildings with power access and a 1,925-sf non-cannabis accessory building on the existing 2,000-sf concrete pad. The new water storage tanks would be used to support the existing and proposed cannabis operations and for potable water and firefighting purposes. The existing and proposed annual water supply would be sourced from the two existing wells on the project site, Wells 1 and Well 2. As discussed in question c) below, the project would construct an additional restroom in the proposed processing building, which would tie into the existing onsite septic system and would not require wastewater treatment. The existing culvert under Seigler Springs North Road would continue to convey stormwater under dirt/gravel entrances to the south and north portions of the facility and does not need to be repaired or replaced. Additionally, a

vegetated swale is currently located between the southern cultivation area and the south side of Seigler Springs North Road. The proposed buildings would receive electricity by the existing PG&E connection.

Less than Significant Impact

b) The existing and proposed annual water supply would be sourced from the two existing wells on the project site, Wells 1 and Well 2. Well 1 is located on APN 115-004-07 and serves as the primary water supply to the cannabis cultivation facility with a pumping yield of 197 gallons per minute. Well 2 is located on APN 115-004-05 and serves as the secondary water supply well with a pumping yield of 275 gallons per minute. As discussed in Section 6.X, Hydrology and Water Quality, the project is not expected to have an adverse impact on groundwater supplies, as water required for project operations would not be a significant fraction of available groundwater in the basin. Project impacts related to water supply would be less than significant with mitigation.

Less than Significant Impact with Mitigation Measure HYD-1 and HYD-2 incorporated.

c) Wastewater generated by the existing cannabis cultivation facility is collected by the on-site septic tank. The proposed project would construct an additional restroom in the proposed processing building, which would tie into the existing septic system. Since wastewater is collected by the existing septic tank on the project site, impacts related to wastewater treatment would be less than significant.

Less than Significant Impact

d) Cannabis operations may generate solid waste from various materials and containers used and household trash from workers and discarded equipment. Cannabis processing typically generates green waste from trimming of unwanted leaves and plant parts. Both CDFA and CDPH regulations require that the cultivator develop a cannabis waste disposal plan, which would require that the waste be disposed of at either a solid waste facility that has a permit to operate from the California Department of Resources Recycling and Recovery (CalRecycle), a composting facility that has a permit to operate from CalRecycle, or a designated composting area.

It is anticipated that weekly waste collection would be required with a three cubic yard bin service through C&S Waste Solutions/Lake County Waste Solutions, which utilizes the Lake County Transfer Station and Recycling Center for disposal. Organic wastes would be composted on site whenever possible and used as soil amendments; therefore, solid waste generated during project operations would not include cannabis vegetative material. The amount of solid waste expected to be generated by the project would be negligible in the context of the capacity of the landfill.

Less than Significant Impact

e) The project would continue to comply with all local, State and regulations regarding solid waste. There is adequate solid waste capacity to accommodate the proposed project, and the project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure.

Less than Significant Impact

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

Discussion:

a) The Lake County EOP establishes multi-agency and multijurisdictional coordination during emergency operations within the County. Construction of the proposed project would occur within the boundary of the project site and would not result in lane closures or otherwise impede traffic along Seigler Springs North Road or other roadways in the project vicinity. During project operation, it is anticipated that up to 20 workers would be employed on site at a given time. Given the low volume of traffic and population in the area, evacuation of the project site during emergencies is not anticipated to substantially increase traffic or otherwise impact the ability for surrounding areas to evacuate. During project operation, adequate access for emergency vehicles via Seigler Springs North Road and connecting roadways would remain available. The project would not result in a substantial alteration to the design or capacity of any public road that would impair or interfere with the implementation of evacuation procedures. The proposed project would adhere to all federal, State, and local fire requirements and would not conflict with the County EOP. Therefore, the impact would be less than significant.

Less than Significant

b) The proposed project is in a rural area of the County that is primarily surrounded by rural, forested, and undeveloped land. The project site is mapped by CAL FIRE as being located within a Very High Fire Hazard Zone within an SRA (CAL FIRE 2025). The degree of hazard in wildland areas depends on variables like temperature, wind, and moisture, the amount of dryness and arrangement of vegetation, slope steepness, proximity to human activities, accessibility of firefighting equipment, and fuel clearance around structures. The proposed project site is located in a generally mountainous area; however, the northern cultivation areas are relatively flat, while the southern cultivation areas moderately slope from northeast to southwest.

Construction of the proposed project would require activities that could result in sparks, such as welding or grinding, which have a greater likelihood of creating a source of ignition than other construction-related activities. Operation of the proposed project is not anticipated to involve activities that would increase the risk of wildfire. Although the proposed project would be located within an area of Lake County mapped as a Very High Fire Hazard Zone, the project applicant would be required to adhere to all federal, State, and local fire requirements/regulations for setbacks and defensible space, including requirements adherence to the CBC Chapter 7A, *Fire Hazard Severity Zones and Building Standards and Materials*, and Public Resource Code Section 4291, which requires property owners to maintain clearance of flammable vegetation of 100 feet from structures in order to reduce the risk of fire. Additionally, 65,000 gallons of water from the existing 300,000-gallon water storage tank have been dedicated to fire suppression for the existing processing building. It is anticipated that the 65,000 gallons of water would also be used for fire suppression of the proposed structures. Therefore, the proposed project would not exacerbate wildfire risks and would not expose project occupants to pollutant concentrations from a wildfire, and the impact would be less than significant.

Less than Significant Impact

c) The proposed project would receive electricity from an existing PG&E connection to the project site and would not require the construction of new roads, off-site electrical distribution lines, or other utilities that may exacerbate fire risks. The installation and/or maintenance of infrastructure associated with the project would not involve any unique elements that would exacerbate fire risk. The applicant is required to adhere to Public Resource Code 4290 Road Standards for emergency vehicle access. The interior roadways will be upgraded to meet width and surface requirements, which will be addressed within the complex grading permit required for this project. Additionally, as discussed above in question b), pursuant to CBC Chapter 7A, *Fire Hazard Severity Zones and Building Standards and Materials*, and Public Resource Code Section 429, the project applicant would be required to maintain defensible space around the proposed structures, which would extend 100 feet from the structure to reduce the risk of structural fires.

Less than Significant Impact with Mitigation Measures WDF-1 and WDF-2 incorporated:

WDF-1: Construction activities will not take place during a red flag warning (per the local fire department and/or national weather service) and wind, temperature and relative humidity will be monitored in order to minimize the risk of wildfire. Grading will not occur on windy days that could increase the risk of wildfire spread should the equipment create a spark.

WDF-2: Any vegetation removal or manipulation will take place in the early morning hours before relative humidity drops below 30 percent

d) As discussed in Section 6.VII, Geology and Soils, the project is not located on an unstable geologic unit or soil and does not have a high risk of landslides or liquefaction. The site is relatively flat, and the grading associated with the project would not significantly alter drainage patterns. . The removal of this amount of trees triggers a Complex Grading Permit to be obtained, and all grading and earthwork would be in compliance with Chapter 30, Grading Ordinance, of the Lake County Municipal Code. Therefore, the impact would be less than significant with implementation of Mitigation Measure GEO-1

Therefore, the proposed project would not 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, and impacts would be less than significant.

Less than Significant Impact

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

Discussion:

a) According to the biological and cultural studies conducted, the cannabis cultivation project does not have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory when mitigation measures are implemented. With the implementation of mitigation measures described throughout this initial study, the potential impact on important biological resources will be reduced to less than significant.

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

b) Potentially significant impacts have been identified related to Aesthetics, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Greenhouse Gasses, Hazards and Hazardous Material, Hydrology, Noise, Tribal Cultural Resources, Utilities and Wildfire. These impacts in combination with the impacts of other past, present, and reasonably foreseeable future projects could cumulatively contribute to significant effects on the environment. Of particular concern would be the cumulative effects on hydrology and water resources. To address this issue, the Lake County Board of Supervisors adopted Ordinance 3106 on July 27, 2021, requiring the applicant to submit a Hydrological Study and Drought Management Plan. Upon review of the Hydrological Study and Drought Management Plan, along with the implementation of hydrological mitigation measures, the project is expected to have a less than significant cumulative impact. There are one pending and two approved projects within a one-mile radius. There are two pending and nine approved projects within a three-mile radius.

   Implementation of and compliance with mitigation measures identified in each section as project conditions of approval would avoid or reduce potential impacts to less than significant levels and would not result in any cumulatively considerable environmental impacts.

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

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

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

Source List

1. Lake County General Plan
2. Lake County GIS Database
3. Lake County Zoning Ordinance
4. Cobb Mountain Area Plan
5. Pasta Farms 3 Cannabis Cultivation Application – Major Use Permit.
6. U.S.G.S. Topographic Maps
7. U.S.D.A. Lake County Soil Survey
8. Lake County Important Farmland Map, California Department of Conservation Farmland Mapping and Monitoring Program
9. Department of Transportation's Scenic Highway Mapping Program, (https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways)
10. Lake County Serpentine Soil Mapping
11. California Natural Diversity Database (https://wildlife.ca.gov/Data/CNDDB)
12. U.S. Fish and Wildlife Service National Wetlands Inventory
13. Biological Resources Assessment for the Cannabis Cultivation prepared by Helix, 2024
14. Cultural Resources Assessment for the Cannabis Cultivation Operation prepared by Acme Archaeological Consultants, 2024
15. California Historical Resource Information Systems (CHRIS); Northwest Information Center, Sonoma State University; Rohnert Park, CA.
16. Water Resources Division, Lake County Department of Public Works Wetlands Mapping.
17. U.S.G.S. Geologic Map and Structure Sections of the Clear Lake Volcanic, Northern California, Miscellaneous Investigation Series, 1995
18. Official Alquist-Priolo Earthquake Fault Zone maps for Lake County
19. Landslide Hazards in the Eastern Clear Lake Area, Lake County, California, Landslide Hazard Identification Map No. 16, California Department of Conservation, Division of Mines and Geology, DMG Open –File Report 89-27, 1990
20. Lake County Emergency Management Plan
21. Lake County Hazardous Waste Management Plan, adopted 1989
22. Lake County Airport Land Use Compatibility Plan, adopted 1992
23. California Department of Forestry and Fire Protection - Fire Hazard Mapping
24. National Pollution Discharge Elimination System (NPDES)
25. FEMA Flood Hazard Maps
26. Lake County Aggregate Resource Management Plan
27. Lake County Bicycle Plan
28. Lake County Transit for Bus Routes
29. Lake County Environmental Health Division
30. Lake County Grading Ordinance
31. Lake County Natural Hazard database
32. Lake County Countywide Integrated Waste Management Plan and Siting Element, 1996
33. Lake County Water Resources
34. Lake County Waste Management Department
35. California Department of Transportation (Caltrans)
36. Lake County Air Quality Management District website
37. Kelseyville Fire Protection District
38. Site Visit – March 18, 2026

39. United States Department of Agriculture – Natural Resources Conservation Service Web Soil Survey
40. Hazardous Waste and Substances Sites List,
41. State Water Resources Control Board (SWRCB) Cannabis Policy and General Order
42. Lake County Groundwater Management Plan, March 31st, 2006.
43. Lake County Rules and Regulations (LCF) for On-Site Sewage Disposal
44. Lake County Municipal Code: Sanitary Disposal of Sewage (Chapter 9: Health and Sanitation, Article III)