

**CEQA ADDENDUM TO THE MITIGATED NEGATIVE DECLARATION
FOR THE GLENDALE CANNABIS FACILITY**

**Glendale Cannabis Facility Conditional Use Permits and Special Permits
Mitigated Negative Declaration
(State Clearinghouse # 2019049021), April 2019**

APN 516-111-064; Glendale Area, County of Humboldt

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Background

Modified Project Description and Project History –

The Glendale Cannabis Facility proposed a facility featuring a wholesale nursery, indoor cultivation, processing, volatile and non-volatile manufacturing, and distribution. The extent of the proposal exceeded the analysis in the CMMLUO, so an Initial Study and Mitigated Negative Declaration (IS/MND) for the facility was developed in order to address potential environmental impacts that could be expected to occur as a result of the development. The MND included mitigations that would bring all potential impacts to a less than significant level or lower. The permits for the Glendale Cannabis Facility were initially approved by the Planning Commission on September 5, 2019 and the IS/MND was adopted by the Planning Commission on the same date. The permits have since expired, but the research and findings within the IS/MND are still valid. The current project is proposed to be developed on the same site as the Glendale Cannabis Facility, and the development's impacts will be the same or less than the impacts contemplated by the MND, so including the same mitigations into the current project will bring all potential environmental impacts of the project to a less than significant level.

The modified project involves a Conditional Use Permit for the construction and operation of a mini-storage center in unincorporated Humboldt County in the Glendale area for Lock Box Storage LLC. The proposed footprint is 30,290 square feet, comprised of two two-story 15,145 square foot buildings, one of which would include a small office space with a restroom. This area would be equivalent to a lot-area coverage of less than 40 percent on the 1.75 acre lot. The building appearance would be typical of other existing mini-storage companies in the Humboldt Bay area. The property is located within the Fieldbrook Community Services District for water and sewer. The parcel has historically been served electricity by PG&E. The proposed operating hours are 7 am to 9 pm.

The modified project is consistent with the adopted MND for the Glendale Cannabis Facility because it will comply with all the MND's mitigations, which were intended to mitigate impacts of development on the property. These include inadvertent discovery protocol to protect cultural resources and limitations on construction-related noise.

Purpose - Section 15164 of the California Environmental Quality Act (CEQA) provides that the lead agency shall prepare an addendum to a previously certified Mitigated Negative Declaration (MND) if some changes or additions are necessary but none of the conditions described in Section 15162 calling for a subsequent EIR or Negative Declaration have occurred. Section 15162 states that when an EIR has been certified for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on

the basis of substantial evidence in the light of the whole record, one or more of the following:

1. Substantial changes are proposed in the project which require major revisions of the previous MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous MND was certified as complete, shows any of the following: A) the project will have one or more significant effects not discussed in the previous MND; B) significant effect previously examined will be substantially more severe than shown in the previous MND; C) mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or D) mitigation measures or alternatives which are considerably different from those analyzed in the previous MND would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Summary of Project Effects

A review of Section 5 impacts:

Aesthetics: The Lock Box Storage, LLC site plan does not indicate the presence of landscaping, but the 26,000 square feet of landscaping indicated on the site plan for the Glendale Cannabis Facility was analyzed as part of the IS/MNDO. In order to retain the same level of estimated impact, the project is conditioned to implement a landscaping plan prior to issuance of occupancy. The landscaping material shall be appropriately placed and shall be equivalent to at least 2% of the total area devoted to off-street parking areas and associated drives or aisles. *Less than significant impact.*

Agriculture and Forestry Resources: No Change. *No impact.*

Air Quality: The Glendale Cannabis Facility required two 24 foot-wide driveways, but the

Lock Box Storage LLC self-storage facility will only require one 24 foot-wide driveway and one 16 foot-wide driveway. These commercial paved driveways would still not generate dust. A self-storage facility is not prone to production of odors, unlike a cultivation and manufacturing facility, so this impact would be reduced. *Less than significant impact.*

Biological Resources: No change. *Less than significant impact.*

Cultural Resources: No change. *Less than significant with mitigation incorporated.*

Energy: No Change. *Less than significant impact.*

Geology and Soils: No change. *Less than significant impact.*

Greenhouse Gas Emissions: The Lock Box LLC self-storage facility will have only one employee, compared to the 22 employees that were proposed for the Glendale Cannabis Facility. The self-storage facility will have customers, however, but is overall still likely to generate less than the 60 daily vehicle trips that were estimated for the cannabis facility, so the estimated impact from greenhouse gas emissions would be reduced. *Less than significant impact.*

Hazards and Hazardous Materials: A self-storage facility does not require the use of as many hazardous materials as a cannabis cultivation and manufacturing facility would, such as fertilizers, pesticides, and solvents. There is potential that customers will store hazardous materials in their units, but they would not have reason to use them onsite. The only potentially hazardous materials a self-storage facility would utilize are cleaning agents. The hazardous materials associated with construction, such as fuels, lubricants, and paints, are still likely to be utilized. The estimated impact from hazards and hazardous materials would be reduced. *Less than significant impact.*

Hydrology and Water Quality: The Glendale Cannabis Facility featured rainwater detention basins that would have suspended sediments and other pollutants prior to allowing water to leave the site. The proposed self-storage facility lacks these detention basins from the proposal but is conditioned to include appropriate drainage in accordance with Public Works standards, so the impact to hydrology and water quality is expected to remain less than significant. *Less than significant impact.*

Land Use and Planning: No change. *Less than significant impact.*

Mineral Resources: No change. *No impact.*

Noise: No change. *Less than significant with mitigation incorporated.*

Population and Housing: The self-storage facility will not require as many employees as the Glendale Cannabis Facility, so there would be less impact because fewer new individuals would need to move to the area in order to support the operation. *Less than significant impact.*

Public Services: Cannabis-related facilities are commonly associated with greater security related demands, which potentially would have resulted in an increase in law enforcement services. Self-service storage facilities lack this association, therefore, the impact to public services would be reduced. *Less than significant impact.*

Recreation: No change. *No impact.*

Transportation: The Lock Box LLC self-storage facility will have only one employee, compared to the 22 employees that were proposed for the Glendale Cannabis Facility. The self-storage facility will have customers, however, but is overall still likely to generate less than the 60 daily vehicle trips that were estimated for the cannabis facility, so the estimated impact from transportation would be reduced. *Less than significant impact.*

Tribal Cultural Resources: No change. *Less than significant with mitigation incorporated.*

Utilities and Service Systems: A self-service storage facility requires significantly less water than a manufacturing and cultivation facility. The only water from utilities required would be for the restroom in the office, compared to the irrigation and solvent needs of a cultivation and manufacturing facility. A self-storage facility would produce significantly less waste than a cultivation and manufacturing facility. The Glendale Cannabis Facility included an onsite wastewater treatment system to treat water prior to being reused for landscaping or going to sewer. Because the Lock Box Storage LLC facility will require less water, the impact on sewer systems from water use would still be less than what the cannabis facility would have produced after that mitigation. Therefore, the impact to utilities and service systems would be reduced. *Less than significant impact.*

Wildfire: No change. *Less than significant impact.*

No changes are proposed for the original MND recommended mitigations. The proposal to authorize the development and operation of a self-storage facility is fully consistent with the impacts identified and adequately mitigated in the original MND. The project as conditioned to implement responsible agency recommendations, results in no

significantly adverse environmental effects beyond those identified in the MND. Compliance with the recommended conditions ensures consistency with the adopted MND and provides for mitigation of all project-related impacts to a less than significant level.

In reviewing the application for consistency with the adopted MND, the County considered the following information and studies, among other documents:

- Site Plan, Elevations Plan, and Floor Plan
- Groundwater Level Test
- County GIS

Other CEQA Considerations

Staff suggests no changes for the revised project.

EXPLANATION OF DECISION NOT TO PREPARE A SUPPLEMENTAL MITIGATED NEGATIVE DECLARATION OR ENVIRONMENTAL IMPACT REPORT

See **Purpose** statement above.

In every impact category analyzed in this review, the projected consequences of the current project proposal are either the same, less than significantly increased, or reduced than the initial project for which the MND was adopted.

Project impact analysis of conformance to the Mitigated Negative Declaration Substituted Mitigation Monitoring and Reporting Program

Mitigation Measure CUL-1: Inadvertent discoveries of Cultural Resources and Human Remains.

- The project is located in the Bear River Band of the Rohnerville Rancheria, Blue Lake Rancheria, and Wiyot Tribe Aboriginal Ancestral Territories. The Bear River Band and Wiyot Tribe referral responses recommended a condition of approval that the project adhere to inadvertent discovery protocol to protect cultural resources. This recommendation has been included as a condition of approval, matching the mitigation CUL-1 from the MND.

Mitigation Measure NOI-1: Construction Related Noise.

- Project approval includes a condition to limit the noise levels of construction activities and to limit the days and time construction equipment may be operated.

Based upon this review, the following findings are supported:

FINDINGS

1. The proposed project will permit a self-storage facility in compliance with county and state requirements and will adequately mitigate environmental impacts.
2. The circumstances under which the project was approved have not changed substantially. There are no new significant environmental effects and no substantial increases in the severity of previously identified effects.
3. For the current proposed project, there has been no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous MND was adopted as complete.

CONCLUSION

Based on these findings it is concluded that an Addendum to the certified MND is appropriate to address the requirements under CEQA for the current project proposal. All of the findings, mitigation requirements, and mitigation and monitoring program of the MND, remain in full force and effect on the original project.